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Planning. Design. Economics.

**Gloucester, Cheltenham and
Tewkesbury JCS**

**Employment Land Assessment
Update**

Gloucester City Council, Cheltenham
Borough Council, Tewkesbury Borough
Council
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1.0 Introduction

Background

- 1.1 Policy SP1 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) states that provision would be made to support “*about 28,000 new jobs*” between 2011 and 2031. It also makes provision for the development of 63ha employment land, in addition to 20ha of replacement employment land at the Ashchurch MoD site (strategic allocation A8).
- 1.2 The JCS identified five strategic sites which are expected to contribute to this employment land requirement. In addition, two further sites were safeguarded, both of which were considered to be suitable for significant and strategic employment use, if additional land is required and if identified constraints could be overcome.
- 1.3 The JCS was based upon NLP’s analysis of employment forecasts which was set out in three separate reports:
- a September 2011: initial work setting out growth options and land requirements, drawing upon forecasts prepared by Cambridge Econometrics;
 - b October 2013: update report using data provided by Cambridge Econometrics and Experian; and,
 - c April 2014: further update report using data provided by Cambridge Econometrics, Experian and Oxford Economics.
- 1.4 Rather than considering a single set of employment forecasts, the final report was based upon a review of three independent employment forecasts. This reflects the approach that was advocated by the Inspector into the South Worcestershire Development Plan in his interim conclusions:
- “It is more difficult to indicate clearly how the employment growth stage of the analysis should be conducted, principally because of the large variations in the employment forecasts provided to the examination. As a first step in this stage, therefore, the Councils will need to satisfy themselves that they have up-to-date and realistic employment forecasts to inform the analysis. This is likely to mean examining and comparing forecasts from more than one source to ensure as far as possible that any they rely on are representative of the likely economic situation over the Plan period”.* (Stage 1 of the Examination of the South Worcestershire Development Plan: Inspector’s Interim Conclusions, Paragraph 45)
- 1.5 NLP’s appointment was solely limited to an analysis of econometric projections and an analysis of the employment land implications of the growth anticipated by the various agencies. In so doing, NLP applied assumptions regarding employment floorspace densities and plot ratios. These were based upon research undertaken by NLP Economics, drawing upon the Employment Densities Guide produced by the Homes and Communities Agency and Offpat.

A flexibility margin (equivalent to 5 years' supply) was applied to allow for choice and churn in the market. NLP also tested the implications of a number of alternative scenarios (sensitivities) relating to spaceless growth, the reuse of surplus industrial land for warehousing purposes and alternative plot ratios. This enabled conclusions to be drawn in relation to the range of employment land that would be required over the JCS period.

1.6 Following the Stage 1 examination hearings, the Inspector issued a request for additional information in relation to the JCS housing, retail and employment policies. The specific tasks that were requested in relation to the employment policies include:

- a Analysis of up-to-date economic forecasts;
- b Assessment of "policy-on" approach, taking account of the views of the LEP, local businesses and developers;
- c Sensitivity testing to consider a range of increases in job numbers;
- d Assessment of past trends (employment numbers and employment land delivery), including loss of land to other uses;
- e Preparation of a clear economic strategy; and,
- f Demonstration of how the demand is to be met both qualitatively and quantitatively.

1.7 NLP has been instructed by the JCS authorities to address points (a) to (d) above, whilst the JCS authorities will respond to points (e) and (f) separately. In this respect, the scope of this report is more extensive to that of our previous commission.

Policy Context

1.8 Paragraph 7 of the NPPF emphasises the role of the planning system in *"contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth"*. In respect of this, one of the core planning principles set out in paragraph 17 is to *"identify and then meet the housing, business and other development needs of an area"*. The implication of this is that the JCS authorities should first understand how much employment land is required over the JCS period and then ensure that those needs can be satisfied.

1.9 Paragraph 21 of the NPPF sets out the matters that should be taken into account by local planning authorities when drawing up Local Plans. These include:

- a Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth;
- b Set criteria, or identify strategic sites, for local inward investment to match the strategy and to meet anticipated needs over the plan period;

- c Support existing business sectors, taking account of where they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area;
 - d Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
 - e Identify priority areas for economic regeneration; and,
 - f Facilitate flexible working practices.
- 1.10 In respect of plan-making, the NPPF requires local plans to be “*aspirational but realistic*” (paragraph 154) and to contain assessments of and strategies for housing, employment and other uses that are integrated and take full account of relevant market and economic signals. Paragraph 161 of the NPPF requires local planning authorities to assess:
- a The needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period; and,
 - b The existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs.
- 1.11 This report focuses solely upon the need for land for B Class economic development. Separate evidence is being prepared by the JCS authorities in respect of the need for non-B Class forms of economic activity and the existing and future supply of land available for economic development.
- 1.12 Section 2a of the Planning Practice Guidance (PPG) provides clarity on the approach that should be taken to the assessment of housing and economic development needs. Paragraph 2a-004 emphasises that the assessment of development needs should be objective, based on facts and unbiased evidence. It should not take account of constraints although any limitations imposed by the supply of land, historic under performance, viability or environmental constraints will need to be taken into consideration when bringing the evidence together to identify specific policies within development plans.
- 1.13 The PPG acknowledges that “*there is no one methodological approach or use of a particular dataset that will provide a definitive assessment of development need*” (ID 2a-005-20140306) but it requires the approach to be transparent and thorough but proportionate.
- 1.14 In respect of employment trends, Paragraph 2a-018 states that “*plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate*”, whilst paragraph 2a-031 considers employment land, stating 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”.*

1.15 Paragraph 2a-032 goes on to state that:

“When examining the recent take-up of employment land, it is important to consider projections (based on past trends) and forecasts (based on future scenarios) and identify occurrences where sites have been developed for specialist economic uses. This will help to provide an understanding of the underlying requirements for office, general business and warehousing sites, and (when compared with the overall stock of employment sites) should form the context for appraising individual sites.” (NLP emphasis)

1.16 This approach has informed the analysis set out in this report.

Structure

1.17 The report is structured as follows:

- Section 2 provides a summary of the feedback that was provided through the consultation exercise undertaken by NLP;
- Section 3 considers past trends in respect of employment growth and the development of employment land;
- Section 4 provides an overview of the latest employment forecasts, including an analysis of the “policy-on” approach that was based upon the views of those active within the local economy. It outlines the employment land requirements associated with different growth scenarios; and,
- Section 5 sets out our conclusions and recommendations.

2.0 Consultation

2.1 The PPG emphasises that consultation with a range of agents and local businesses is an important element of understanding the existing and future employment needs for a given area.

2.2 A programme of consultation was undertaken in order to understand the main local economic issues that exist within the Cheltenham, Gloucestershire and Tewkesbury JCS area and the impacts upon the need for employment land in the future. The GFirst LEP has provided valuable assistance to NLP in undertaking consultation with local stakeholders. This included provision of a list of potential interviewees and arranging our attendance at LEP Sector Group Meetings to discuss employment growth and land requirement issues. Appendix 1 contains the full list of potential consultees provided by the LEP whilst Appendix 2 includes a list of those people who were interviewed via telephone or who responded via email. Appendix 3 includes a list of the questions which were used to help guide these discussions.

2.3 This section provides a summary of the key themes emerging from the consultation with individual stakeholders. It then goes on to summarise the comments that were made by attendees at the LEP sector group meetings.

Stakeholder discussions

Company characteristics

Discussions were held with representatives of a wide range of companies. These included advanced engineering & manufacturing, construction companies, retailers, and business / professional service providers. The companies vary substantially in size, ranging from eight to 850 employees. Most serve regional and national markets but six also serve international markets. Most companies interviewed have been located in the JCS area for a considerable time – the longest was quoted as 153 years – and when asked for their main reasons for staying in the area, some highlighted historical reasons due to the company having started in the local area whilst many respondents referred to the strengths of the local employees in terms of their skills and experience.

Expansion needs

2.4 The companies interviewed are currently operating from a wide range of locations including town-centre office accommodation, out-of-centre industrial estates, business parks and an out-of-centre manor house. Nearly all respondents felt their current premises met their business needs, although one identified a flood risk as a problem with their existing site. One respondent felt that the premises no longer met their needs and another stated they would need to expand into new premises very soon.

- 2.5 Approximately half of the respondents indicated that they anticipate expanding over the next 5, 10 and 20 years, half of which expect to expand in the very near future, and the majority of whom would be prepared to move elsewhere if they could not find suitable expansion land locally, even though their strong preference would be to remain in the local area.

Existing employment land in the JCS area

- 2.6 The overall consensus was that the existing employment land supply was insufficient to meet future needs. Some respondents believe that there is already a very severe shortage of employment land and a significant undersupply, whilst others consider that there is an adequate supply of land at present but anticipate a significant need to emerge over the next 3 to 5 years. Only one respondent expressed a view that land supply is not a particular local issue.
- 2.7 Respondents made comments on the quality, as well as the quantity of available employment land. Current space was said to be dated and unattractive for businesses. Some respondents stated that the incorrect type of land was available; for example, some respondents highlighted that there is a lack of space for new offices and a shortage of Grade A business space was identified as a particular problem.
- 2.8 A number of respondents also commented that land was not available in the right places. Some stated that there was no land available in the areas where businesses wanted to locate – near the M5 junction, for example, whilst others believed that more land was needed in town centres. Cheltenham, in particular, was said to have had little employment land growth over recent years and availability was said to be very poor there. Cheltenham was also highlighted as lacking in modern space, even though it is viewed as a prestige business location which is in high demand. This scarcity of high quality business land and premises was considered to be a reason for the high price of land and it is felt that it is being exacerbated by the loss of employment land to other uses.

Barriers to employment land provision

- 2.9 The planning system was identified by several respondents as one of the main barriers to employment land provision. Specific areas of concern include planning committees and politicians, too much red-tape and planning regulations, the slow pace of the process (including plan-making), bias towards large developers and local authorities holding up the provision of land.
- 2.10 A number of respondents also highlighted the physical barrier that the Green Belt presents, claiming that it had contributed to the inability to build office parks and attract investment, whilst the housing shortage was also considered to be a limiting factor in that the area was failing to retain and attract families and workers.

Opportunities

- 2.11 Respondents highlighted some opportunities to increase the supply of employment land. Particular reference was made to:
- a The need to make land available **near motorway junctions**; specific mention was made of the stretch of the M5 between Tewkesbury to Stonehouse.
 - b Given the demand for businesses to located in Cheltenham and the shortage of space within the town, the safeguarded site to the **west of Cheltenham** was identified as a significant opportunity for future business development.
 - c **Brownfield land** was described by some respondents as the “ideal location” for new employment sites, subject to infrastructure improvements being undertaken. It was suggested that provision of better transport infrastructure would help to create an attractive place for people to work and thus attract businesses.
 - d The need for greater availability of **smaller sites for development**. It was considered that this would provide more options and help SMEs in particular.

Economic impacts of employment land undersupply

- 2.12 The perceived undersupply of employment land was considered to have a profound negative impact on the economy of the area, acting as a constraint for businesses and forcing them to move elsewhere. The shortage of employment land was identified as outweighing the area’s key strengths such as a high quality workforce and lower costs than other centres.
- 2.13 The flight of businesses from the area was the key concern identified. It was claimed that there was a long list of businesses that had left in the last 15 years, having been unable to relocate in Gloucestershire. These businesses were thought to have moved to other areas on the M5 corridor, including Bristol, Worcestershire and Birmingham.
- 2.14 In addition to businesses leaving the area, it was also stated that many businesses would not look for land in the area because they knew that there was such limited availability and choice. As such, the undersupply of land was having a double impact in terms of existing businesses being unable to expand, and hence relocating elsewhere, and new investors not being attracted into the area.
- 2.15 Improvements to local infrastructure was identified by one respondent as serving to further increase the relative attractiveness of competing centres. In particular, it was suggested that improvements to the A417 would open up opportunities in Worcestershire and the West Midlands in preference to the JCS area where a shortage of land is failing to provide for business needs.

Views on future employment land

- 2.16 A range of potential solutions were offered in respect of the changes that were considered necessary for the future. The majority of respondents believed that there was a need to allocate more land than is currently allocated by JCS. Some general points were raised, with some respondents highlighting the need for flexibility of sites creating in-built headroom in the plan. It was also stated that provision should be made for sites that can be deliverable within a short time frame of around 6-12 months.
- 2.17 Whilst one respondent stated that more town centre areas were required for commercial activity and that densities should be increased with higher buildings of 4/5/6 floors, others stressed that employment land should not be restricted to sites in town centres and edge of centres. Many respondents also made points regarding transport, stressing that businesses require good road infrastructure, amenities and easy access and that infrastructure improvements are therefore necessary to continue to facilitate businesses' operation.
- 2.18 The restricted access to the M5 at Junction 10 was a common theme, with greater access, allowing traffic to enter and exit in both directions, considered essential. The improvement of Junction 12 was cited as an example of the potential benefits where improvements to infrastructure have facilitated major growth for Waterwells Business Park.
- 2.19 Whilst some respondents also stated that Green Belt land should be released in order to increase the amount of land available, others believed that the Green Belt is necessary to ensure Cheltenham, Gloucester and Tewkesbury remain distinct. The balance between the need for more land and continued protection of the gap between Cheltenham and Gloucester is therefore an important consideration to be taken into account.

GCHQ expansion

- 2.20 GCHQ occupies a prominent role in the knowledge and technology industry in the area and clearly makes a critical contribution to national security. The presence of GCHQ in Cheltenham is of considerable importance to the local economy, both in terms of direct employment and indirectly, through the supply chain.
- 2.21 GCHQ has written to the Inspector (Appendix 4) setting out their objectives for future growth and expected land requirements. The letter states that the availability of suitable land which is well located in relation to the existing site is necessary for its own future operations and the expansion of its supply chain.
- 2.22 Although the quantum of land needed for the supply chain is not known, GCHQ has identified a requirement for an additional 20ha to meet its future operational requirements. It has expressed its support for the early release of the safeguarded site to the west of Cheltenham. This area has the capacity to accommodate the level of growth required by GCHQ together with a business park oriented to serve the cyber security sector and thereby enable

Cheltenham to compete with other areas on the M5 corridor that are actively seeking to attract GCHQ supply chain businesses. This is a critically important sector and provision should be made to accommodate its increasing needs.

Key growth sectors

- 2.23 When questioned on which sectors are likely to grow in the next 5 years, respondents gave very similar answers and identified a variety of key sectors:
- a Aviation;
 - b Engineering;
 - c Nuclear;
 - d Leisure;
 - e Financial businesses;
 - f Information technology; and,
 - g Marketing and Public Relations.

LEP Sector Groups

2.24 NLP was invited by the LEP to attend a series of meetings with its sector groups. These groups relate to each of the main growth sectors identified by the SEP. In cases where the scheduling of the sector group meetings did not accord with the timescales set for the completion of this report, written comments were invited and were received from the energy and ICT sector groups.

2.25 A consistent approach was taken at each meeting with NLP presenting the headline employment growth figures for each sector taken from the forecasts obtained from Experian, Cambridge Econometrics and Oxford Economics, before posing a series of questions regarding the expectations of members regarding future employment growth and the extent to which the baseline forecasts were considered to reflect their views of future prospects. Comments were also invited in relation to the supply of employment land within the JCS area.

Construction and Infrastructure

- 2.26 Key issues raised by members of this group include:
- a The demand for employment space continues to be significant and there are severe shortages across the JCS area.
 - b A considerable amount of employment land has been lost to other uses in recent years and an additional allowance should be made to compensate for this, in addition to the space that is required to meet future needs.

- c Businesses expect a range and choice of good quality sites and the level of employment land set out in the JCS is insufficient to meet this requirement.
- d Concern was expressed about some of the sites that are proposed for allocation within the JCS – both in terms of their deliverability and their ability to be sufficiently attractive to the market.
- e In terms of future growth, it was suggested that existing business parks should be permitted to expand, and that land should be released for development at Junction 10 of the M5 and at North West Cheltenham.
- f It is likely that future growth in employment and land requirements will be driven by a number of key sectors:
 - i Manufacturing, and particularly advanced manufacturing;
 - ii Nuclear energy, which is expected to expand and will create jobs within new power facilities as well as requiring the creation of new office space; and,
 - iii GCHQ, which is a driver of growth within Cheltenham, and the expansion of its supply chain represents a major opportunity for the area.

2.27 Following the Construction and Infrastructure group meeting, a letter providing further comments relating to employment land requirements in the JCS area was prepared by the Chief Executive of the LEP. The letter states that the comments contained within it were initially developed by the Construction and Infrastructure Group but subsequently agreed with the Chairs of the ten sector groups and the Business Membership Group of GFirst LEP. A copy of this letter is set out in Appendix 5.

2.28 The letter refers to the ambitious Strategic Economic Plan (SEP) that has been prepared by the LEP and which seeks to *“produce significant growth in GVA”*. It states that the achievement of this ambition *“requires the County to do significantly better than we have done in previous years which the SEP will achieve by exploiting the opportunities presented by the motorway corridor and doing more to support indigenous businesses growth”*. It goes on to state that *“we are satisfied that there will be strong local growth and that there is confidence within the business community of continued and strong growth during the JCS plan period”*. This view reflects the opinion that we have received through the consultation process.

2.29 The letter from the LEP identifies *“several exciting opportunities for growth within the County including the potential for development of an M5 Growth Zone and business expansion through High Growth Potential Sectors”*. In summary, these include:

- a A strategic business park should be provided at Junction 10 of the M5 which *“has significant potential for development but is effectively sterilised due to the limited access”*.
- b The safeguarded land at North West Cheltenham which *“should be designated for “B” Class uses with the relocation of some of the*

employment designation currently shown in Indicative Site Layout 5 (North West Cheltenham Urban Extension) moved to the safeguarded land. It is considered that the employment allocation at this location should provide between 50 ha of new employment land in addition to the already identified 23 ha within the JCS”;

- c The Fiddlers Green safeguarded land (West Cheltenham) which “*should be utilised for expansion of businesses within this area as well as accommodating associated businesses so that a new “Science Park” can be established for the area that is based on a technology theme. ... In the region of 30 ha of new employment land should be allocated at this location”.*
- d Gloucestershire Airport where the LEP proposes the release of 10ha land to facilitate “*expansion to the non-essential operational area to allow new B class development and associated uses to the east of the airport”;*
- e Staverton where the LEP proposes the release of 20ha of “*strategic employment land at Staverton (north of Gloucestershire Airport), to allow existing businesses to expand at this popular business location”;* and,
- f Up to 20ha extension to the Ashchurch/Fiddington employment area “*to provide for growth in the north of the JCS area as well as allowing existing businesses in the area to expand”.*

2.30 The letter concludes that “*these allocations should be made in addition to the strategic employment land allocations already identified within the JCS taking the strategic employment land provision within the Plan to 194.2 ha” (NLP emphasis). It is recognised that larger business parks will take some time in which to be developed and is recommended that the sites at Gloucestershire Airport, Staverton and Ashchurch/Fiddington, together with the strategic sites already contained within the JCS should be progressed in the shorter term for general employment purposes.*

2.31 The letter also makes comments on the four proposed strategic sites that have been identified in the JCS.

2.32 The identification of land for future employment development is outside the scope of NLP’s commission and is being addressed by the JCS authorities, but these comments are nevertheless helpful in emphasising the views of the LEP regarding the future direction of growth.

Banking and Finance

2.33 Key issues raised by members of this group include:

- a A lack of space is a major issue in Cheltenham which has been the historic heart of the financial sector in Gloucestershire. A large number of employment premises have been lost to other uses and much of the remaining space is no longer fit for purpose.

- b Additional employment land should be identified to make up for past losses and to address the current pent-up demand, as well as accommodating future growth.
- c The attractiveness of Gloucestershire in terms of its environment and quality of life plays a major role in attracting inward movement of investment and workers, although sufficient housing should be provided to ensure that the level of expected net in-migration can be supported.
- d Future growth in the banking and finance sector is expected in Tewkesbury and Gloucester.
- e Although the retail banking sector is shrinking, other elements of the banking and finance sector – in particular online functions – are expanding significantly.
- f As a result, the level of employment growth identified by the forecasters is considered to be appropriate and reasonable.
- g The professional service sector within the JCS area is likely to expand considerably in the future.

Advanced Engineering

2.34

Key issues raised by members of this group include:

- a Significant concern was expressed by the advanced engineering group about the baseline employment forecasts for the sector.
- b The JCS area is a leading area for high technology businesses and this is considered to be a major growth area, such that growth within the JCS area is expected to be higher than the national average.
- c Employment growth in the advanced engineering sector is expected to be driven by new investment and the return of businesses that have previously moved its workforce abroad.
- d Key sub-sectors within advanced engineering include automotive and aerospace. One business within the aerospace sector reported having increased its workforce by between 300 and 500 in the past 5 years.
- e 20,000 new high tech jobs have created in the past 20 years and this is expected to accelerate in the future.
- f The SEED initiative is expected to create 400 jobs in the advanced engineering sector in the next 18 months. Extrapolating this figure across the JCS period would result in the creation of approximately 5,000 new jobs. This figure was considered to represent a better reflection of future growth within the sector – albeit that this is substantially lower than the level of growth shown to have taken place over the past 20 years.
- g The JCS area is considered to represent a good place to do business, comprising a high quality environment with an excellent and highly skilled workforce. However, the availability of land is critical for future expansion of the advanced engineering sector and this is proving to be an

increasing problem which represents a threat to the expansion of this sector.

Retail

2.35

Key issues raised by members of this group include:

- a The employment forecasts for the retail sector were considered to be too low when compared to the national average. The figure should be adjusted upwards and there is no particular local case for a lower figure than the national figure. The sector group has more confidence in the Experian data than the OE or CE data because of the role of Experian in the retail sector.
- b Retailers are keen to be represented in Cheltenham and are waiting for space to become available. A number of new retail developments are coming forward in Cheltenham and will generate between 920 and 1,220 jobs within 4 years. These include:
 - i Brewery II: this was subject to a green book analysis/economic impact assessment which cited 420 direct jobs and 174 indirect/induced jobs;
 - ii Beechwood Arcade: major refurbishment and the creation of space for a new anchor tenant is likely to deliver approximately 400 jobs;
 - iii Other town centre retail, including Regency Place retail starter units and the reuse of previously vacant building on High Street by Top Shop is estimated to create approximately 100 jobs;
 - iv North Place: although the future of this abandoned edge of centre supermarket scheme is unclear, it was suggested that it could provide a minimum of 100 jobs; and,
 - v Former BMW site (out of town): whilst this might be resisted on policy grounds, it was suggested that it has the potential to yield up to 200 jobs.
- c In Gloucester there have historically been some vacancies but less so now that the economy is improving. Gloucester has a strong regeneration agenda with land available for a retail led development at the Kings Quarter, some land at Blackfriars as part of a residential led mixed use development, and land at the docks and quays area. The delivery of development as part of the regeneration agenda is likely to result in a significant increase in retail employment in Gloucester.
- d Although Cheltenham and Gloucester are the main retail centres within the JCS area, the retail sector is also strong in Tewksbury.
- e There is also the additional expenditure available from visitors as the area is a popular national tourist destination.
- f A lot of jobs in the retail sector are part time jobs and so new jobs created in the sector do not necessarily have a direct relationship to the need for new homes.

- g No sector representatives at the meeting expressed a desire for out of town retail space, rather creating additional retail space in the town centre was the main issue of interest.

Energy

- 2.36 RegenSW estimates over 10,000 people are currently employed in the renewable energy sector across the South West. Across Europe offshore wind accounted for the bulk of global employment with 58,000 jobs, and the UK is recognised as the world leader in the wind sector (offshore and onshore), with employment growing from 21,100 jobs in 2010 to 34,400 in 2012/13 (RenewableUK).
- 2.37 The total number of renewable energy projects in Gloucestershire grew by over 1,000 in 2014, from 6,855 to 7,929, providing 66MW of electrical capacity and 44MW of thermal capacity. The national and regional market for community led renewable energy projects over the next 10 years is expected to grow considerably and we anticipate that this will result in a demand for services relating to planning, installation, facilities management and development.
- 2.38 The Marchmont Observatory at the University of Exeter reported in December 2013 that highly-skilled jobs account for 46.6% of Gloucestershire employment, higher than national averages, and over half of these (52%) are employed in Knowledge-Intensive Sectors. Employment in higher-skilled occupations in Gloucestershire is expected to increase by 34,000 (11%) between now and 2025.

ICT

- 2.39 Forecasts developed by the Tech Partnership in association with Experian show the number of people working in the UK as tech specialists will increase from 1.2m in 2014 to 1.6m in 2024. The growth forecast for technology specialists in the South West is 27% with the top 5 tech specialist growth areas to be:
- a Web design/development professionals 57%;
 - b Programmers/software development professionals 49%;
 - c Tech Directors 39%;
 - d IT User Support Technicians 29%; and,
 - e IT Specialist Managers 28%.
- 2.40 It is expected that there would be a substantial further increase in employment in the ICT sector if the proposed “Cyber Park” at West Cheltenham (as referred to in correspondence from GCHQ) is developed and includes provision for the GCHQ supply chain and any expansion of GCHQ itself. Although the precise scale of employment growth is not known, it is expected to be considerable.

Other sector groups

- 2.41 No comments have yet been received in relation to the creative industry, leisure and transport sectors.

Conclusion

- 2.42 NLP has undertaken a wide ranging consultation exercise, in line with requirements of NPPF and PPG. The purpose of this has been to understand local views about the current supply of employment land – in terms of its quantum, quality and location – and future employment growth prospects – in terms of the expected scale of growth and employment land implications.
- 2.43 A clear and common theme from respondents has related to the current shortage of employment land and the implications of this upon the attractiveness of the JCS area as a business location. It was also widely considered that the provision for employment land set out in the JCS is insufficient to meet future needs of the local economy and will not enable the JCS area to reach its full economic potential and would not support the delivery of the LEP’s objectives, as set out in the SEP.
- 2.44 In seeking to quantify the level of employment land that is likely to be required in the future, NLP has taken careful consideration of the views of the stakeholders involved in the consultation process. This exercise has informed our assessment of past trends and our analysis of econometric forecasts, and has been particularly significant in shaping a “policy-on” scenario, as detailed in Section 4. A commonly expressed view was that it is very difficult to anticipate future employment growth given the wide range of economic, political and environmental influences upon this and the time-period over which the JCS is focused. The aim must therefore be to seek to achieve a reasonable indication of future change and to ensure that this is regularly and carefully monitored. However, a shortage of land for employment development should not be permitted to constrain the economy or potential employment growth.
- 2.45 The views that have been expressed regarding the type of employment land that is required and the preferred locations for development have been conveyed to the JCS team and will inform their assessment of the need for any additional employment land to meet the requirements set out in this report.

3.0 **Past Trends**

3.1 The PPG (ID 2a-018-20140306) states that an assessment of the likely growth in job numbers should be based on past trends and/or economic forecasts as appropriate. In order to achieve a comprehensive profile of the current economy within the JCS area, and to inform a robust understanding of future growth, NLP has considered past trends alongside economic forecasts and the views of those active within the local economy.

3.2 Given that none of the alternative methodologies for assessing future employment growth and land requirements are perfect, there is considerable benefit in considering a range of approaches. Past trend based approaches offer the advantage of reflecting local conditions, albeit that there can be no certainty that historic conditions will be repeated in the future. Any trend based assessment is also reliant upon the reliability of the monitoring of trends that has been undertaken and the data that is now available.

3.3 This section considers the historic rate of change in employment levels and in development activity across the JCS area.

3.4 Figures for employment change were obtained from the ONS Jobs Density whilst information on past development rates was provided by the JCS authorities, based on their monitoring records¹. This data relates both to historic development activity and losses from the employment land stock to other uses although it should be noted that the past trend information is not available for a consistent time period.

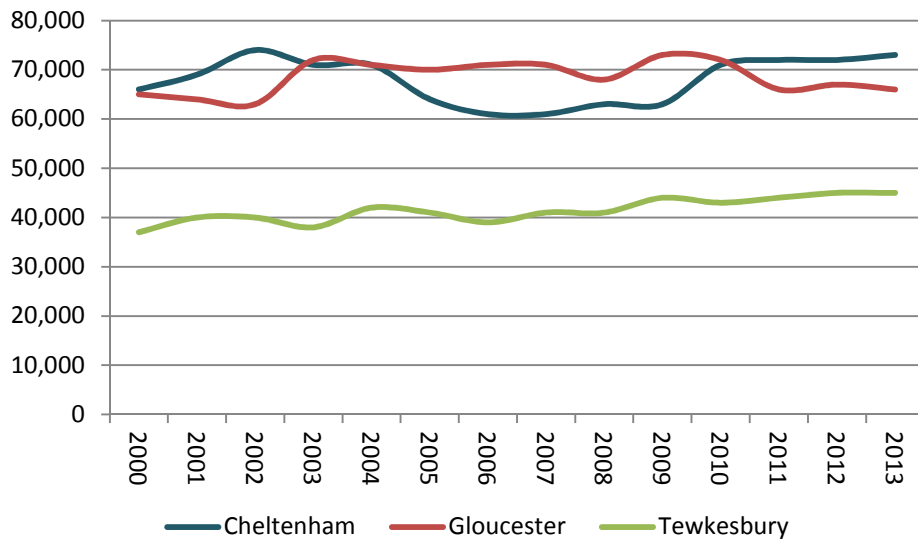
Employment Trends

3.5 Data on employment growth within the JCS area between 2000 and 2013 was obtained by the ONS Jobs Density measure of jobs. This reflects the total number of jobs is a workplace-based measure and comprises employee jobs, self-employed, government-supported trainees and HM Forces.

3.6 This analysis reveals that an additional 16,000 jobs were created in the JCS area between 2000 and 2013. This represents an annual average of 1,231 jobs which, if maintained throughout the JCS period would result in the creation of an additional 24,620 jobs.

¹ Details of the past trends are set out in Appendices 6-9

Figure 3.1 Employment growth in Cheltenham, Gloucester and Tewkesbury, 2000-2013



Source: ONS Jobs Density

3.7

The level of employment growth across the JCS area equates to an 8.7% increase between 2000 and 2013, although as set out in Figure 3.2, there is considerable variation between the constituent authorities, with a 21.6% increase in the number of jobs in Tewkesbury, compared to an increase of just 1.5% in Gloucester.

Figure 3.2 Distribution of employment growth in JCS area, 2000-2013



Source: ONS Jobs Density

3.8

The historic level of employment growth across the JCS area equates to an annual average of 0.7%. This is higher than the annualised averages identified by Cambridge Econometrics (0.48%) and Oxford Economics (0.62%) but lower than the annualised average identified by Experian (1.08%). However, it broadly similar to the annualised average growth associated with the average

of the three forecasts (0.73%). Full details of the econometric forecasts are set out in Section 4.

Employment Land Trends

Employment Land Development

3.9 A total of 16.41 ha employment land was delivered in Cheltenham over the 8 year period between 2006/7 and 2013/14, equivalent to an average of 2.05ha per annum, whilst 43.15ha was delivered in Gloucester over the 10 year period from 2004/5 to 2013/14. This equates to an annual average of 4.32ha. The records for Tewkesbury cover the period from 2004/5 to 2013/14 but is incomplete and does not include 2010/11 and 2011/12. A total of 71.11ha was delivered over the 8 years for which data is available, equivalent to 8.89ha p.a.

3.10 A break-down of employment land delivery by use class is only available for Cheltenham and Gloucester, although Tewkesbury Borough Council's records do provide a breakdown by floorspace for the four year period between 2005/6 and 2008/9. Care should be given when seeking to compare this against figures for the amount of land developed in the other areas as the floorspace data does not relate directly to land requirements which will be determined by factors such as the height of the building and the level of car parking and strategic landscaping. However, the distribution of recent employment developments across the JCS area² by use class is summarised in Table 3.1:

Table 3.1 Breakdown of new employment land/floorspace development by use class

	Cheltenham	Gloucester	Tewkesbury*
B1	45.1%	34.5%	39.3%
B2	32.2%	2.2%	40.2%
B8	23.7%	63.3%	20.5%

* Floorspace data only

Source: Cheltenham and Gloucester monitoring data

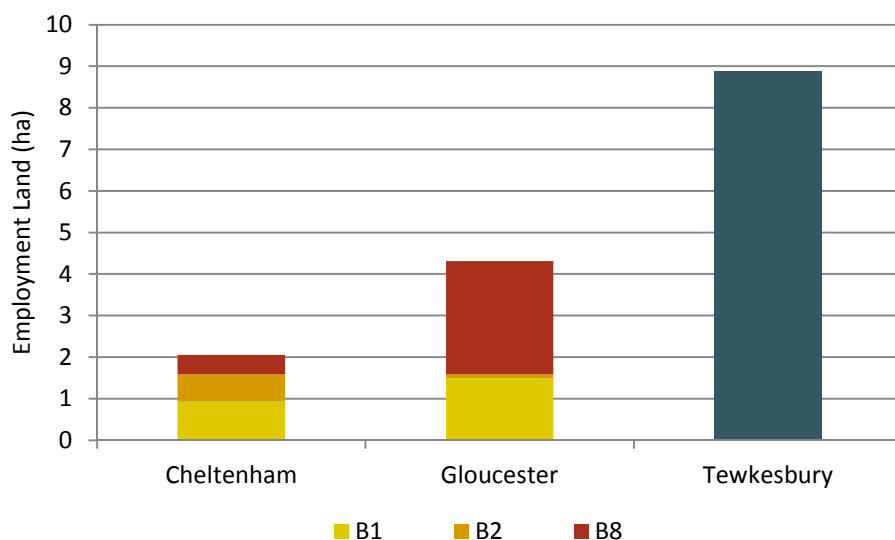
3.11 This distribution is a function of both land availability and the existing economic profile of the constituent JCS authorities. Although more land has been developed for B8 purposes than for any other use, the nature of the business activities within the different use classes, and their specific land and space requirements mean that fewer jobs are likely to have been accommodated in new B8 facilities than in B1 premises.

3.12 The geographical distribution of the employment development is set out in Figure 3.3. Again, this reflects the availability of land within the three local authority areas and the specific focus of the local economy within each area, with Tewkesbury accommodating a proportion of Cheltenham and Gloucester related growth. Because of the difficulties in identifying the land implications of

² Data covers the following periods:
 Cheltenham: 2006/7 – 2013/14, excluding 2010/11
 Gloucester: 2004/5 – 2012/14
 Tewkesbury: 2005/6-2008/9 and 2013/14

the floorspace figures provided for Tewkesbury, and the fact that the breakdown by use class in Tewkesbury is only available for four years, the graph only shows a total figure for Tewkesbury district. The figures are annualised to overcome differences in the periods for which data is available.

Figure 3.3 Distribution of new employment land development (figures ha p.a.)



Source: Cheltenham, Gloucester and Tewkesbury monitoring data

3.13 Across the JCS area, a total of 15.25ha has been developed each year since 2004/5. If continued throughout the JCS period, this would necessitate the identification of 300ha of employment land.

3.14 It is not known exactly how much employment land has been delivered across the JCS area since the start of the JCS period in 2011. This is because data is not available for Tewkesbury in 2011/12 and Gloucester City Council now monitors employment land on a biannual basis, such that it has provided a figure for 2010-2012, rather than 2011-12. Based upon the data that is available, it is estimated that approximately 45.3ha employment land was delivered between 2011 and 2014.

Table 3.2 Employment Land Delivery, 2011-14

	Employment Land Delivered	Time Period	Assumed Delivery 2011-14
Cheltenham	10.62ha	2011-14	10.62ha
Gloucester	17.62ha	2010-14	13.22ha
Tewkesbury	14.3ha	2012-14	21.45ha
JCS Area			45.29ha

Source: Cheltenham, Gloucester and Tewkesbury monitoring data

Loss of Employment Land

- 3.15 According to the figures provided by Gloucester City Council, a total of 85.26ha of B class land in Gloucester was redeveloped for other purposes between 2004/5 and 2013/14. This equates to an average of 8.53ha p.a. However, these figures include 69.82ha at RAF Quedgeley which was redeveloped for residential purposes. This military base was categorised as a loss of B Class land as it provided B class employment in the various buildings on the site before they were demolished, although military facilities are defined as sui generis by the Use Class Order. It is not expected that any similar development will come forward again in the future.
- 3.16 Cheltenham Borough Council's records reveal that the level of employment land losses has been lower at 5.27ha over the 8 year period between 2006/7 and 2013/14. This equates to 0.65ha p.a. However, whilst only a relatively modest amount of employment land has been lost to other uses, evidence provided by Cheltenham Chamber of Commerce has identified a total of 24 employment buildings in Cheltenham, each of more than 1,500 sqft (143 sqm), that have been redeveloped for non-B Class uses. The total amount of floorspace that has been lost amounts to 523,500 sqft (48,633 sqm) and it is understood that there has also been a considerable number of units under 1,500 sqft that have also been redeveloped for non-B Class purposes. Whilst a proportion of this was relatively low quality, it has fuelled the current shortage of space which was identified as a major problem by those active within the local economy.
- 3.17 Tewkesbury Borough Council has not undertaken any monitoring of employment land losses, although it has been indicated that there has not been a substantial amount of non-B class development on employment sites within Tewkesbury.
- 3.18 Excluding the loss of RAF Quedgeley, a total of 12.63ha employment land has been lost to other uses in Gloucester since 2010, whilst 1.3ha employment land has been lost in Cheltenham since 2011.

Implications for the JCS

- 3.19 Although the information that is available is incomplete, a high level of employment land development has taken place across the JCS area over the past 8-10 years. An average of 2.6ha employment land p.a. (60% of total) was developed in Gloucester on non-allocated sites although this is largely due to the age of the Gloucester Local Plan and a substantially larger proportion of employment development in Cheltenham and Tewkesbury has been on allocated sites.
- 3.20 Going forwards, it is expected that the JCS and individual city and district Local Plans will provide the strategic context for development. However, not all new employment development would take place on strategic allocations in the JCS. Instead, the Local Plans will play an important role in allocating smaller, non-strategic sites for development. The JCS should provide a clear steer in this

regard by setting out the overall employment land requirement for the three individual local authority areas and identify how much should be provided by Local Plan allocations.

- 3.21 The amount of employment land that has been lost to other uses in Cheltenham and Gloucester has been substantial. A firm policy position should be established to seek to protect employment land from inappropriate forms of redevelopment, albeit that this should be sufficiently flexible to deal with changing circumstances that might warrant the future redevelopment of existing employment sites where it can be demonstrated that there is no market demand for such sites or where they are no longer suitable for employment purposes. It is likely that employment land will continue to be redeveloped for other purposes in the future, especially following the announced extension of the office to residential permitted development rights. However, the application of a firmer policy position would help to reduce such losses.
- 3.22 In order to prevent any shortage of employment land arising from the future redevelopment of B class land and premises, it is important to express any land requirements associated with the forecasts as net (rather than gross) figures. Whilst the flexibility margin allows for some future loss of employment land, the quantum of losses that have occurred in Cheltenham and Gloucester exceed the likely scale that would be anticipated by any reasonable flexibility allowance.
- 3.23 Given that the JCS period started in 2011, it is appropriate for the JCS to ensure that any losses that have occurred since that time are made up. It is therefore recommended that an additional 10ha employment land should be provided for, in addition to any future needs, in order to mitigate any recent losses.

4.0

Employment Forecasts

4.1

Up-to-date (2015 based) employment forecasts were obtained from Experian, Cambridge Econometrics and Oxford Economics. These set out projected employment growth in each of the three JCS authorities by economic sector between 2011 and 2031.

4.2

Results were divergent in terms of the scale and distribution of anticipated employment growth.

Table 4.1 Forecast employment change in JCS area, 2011-2031

	Experian	OE	CE	Average
Cheltenham	15,760 (20.5%)	14,308 (21.2%)	7,622 (10.8%)	12,563 (17.5%)
Gloucester	15,710 (21.4%)	3,158 (4.6%)	5,252 (8.0%)	8,040 (11.6%)
Tewkesbury	10,000 (24.2%)	5,245 (11.3%)	4,636 (10.3%)	6,627 (15.0%)
JCS Area	41,470 (21.6%)	22,711 (12.4%)	17,510 (9.6%)	27,230 (14.7%)

Source: Experian Business Strategies, Oxford Economics, Cambridge Econometrics (2015) / NLP Analysis

4.3

These sectors relate to the UK Standard Industrial Classification (SIC) codes groups (UK SIC, 2007) and have been categorised into the standard employment use classes (i.e. B1a/b, B1c/B2, B8); those that do not fall into the B class sectors have been defined as “other”. In undertaking this categorisation process, NLP has taken account of the fact that some of the sectors might fall into more than one land use category whilst some jobs in non-B Class sectors utilise industrial or office space

4.4

The space implications of the employment forecasts were ascertained by using typical ratios of jobs to floorspace for the different B Class uses. NLP has applied the ratios as set out below:

Table 4.2 Jobs to Floorspace Ratios

Use	Ratio	Notes
B1(a/b)	1 job per 12.5 sq m	Based upon B1 General and HQ Offices
B2/B1c	1 job per 37 sq m	Based upon B2 General Manufacturing
B8	1 job per 65 sq m	Based upon B8 General Warehousing

Source: NLP Economics, June 2011, based upon the 2010 Employment Densities Guide produced by the Homes and Communities Agency and Offpat.

4.5

Floorspace requirements can be translated into land requirements by applying average plot ratios. In this case, an average plot ratio of 0.4 is used (i.e. so that a 1 ha site would be required to accommodate 4,000 sq m of employment

floorspace) for B2/B1(c) and B8 uses. Given the potential to accommodate new office floorspace at a higher density within existing urban areas, a higher plot ratio has been assumed for B1(a/b) use: 1.0 for one third of the additional space and 0.4 for two thirds of the additional space.

- 4.6 It is usual practice to apply an allowance for additional land to come forward. The purpose of this is to:
- a Provide for a margin of error in the forecasting process;
 - b Provide for deviations from the stated assumptions regarding spaceless growth / contraction;
 - c Allow developers and occupiers a reasonable choice of sites;
 - d Enable normal market movement with relocations and turnover of firms;
 - e Give some flexibility while old premises are redeveloped and new premises are coming forward;
 - f Allow for some limited release of existing employment sites to other uses; and,
 - g Allow for some sites not coming forward.
- 4.7 NLP consider that an allowance of several years of past take-up to be appropriate, which allows for delays in sites coming forward. In this case, we have assumed an allowance equivalent to an additional 5 year supply has been assumed. This approach will ensure a basis for on-going supply throughout the JCS period from 2011 to 2031, such that at any point during this time, there will be a 5 year supply of suitable and deliverable employment land; this is effectively equivalent to a 25% uplift. In so doing, it would allow for a level of flexibility and choice in the future as well as satisfying the present unmet needs of potential occupiers.
- 4.8 The following additional allowances have also been applied by way of uplift to the baseline requirements:
- a Additional 10ha to make up for the loss of employment land that has occurred in Cheltenham and Gloucester since the start of the Plan period (see analysis of past trends in Section 3 for details); and,
 - b An additional 20ha to reflect the identified operational requirements of GCHQ (see letter from GCHQ to Inspector, dated July 2015 in Appendix 4 for details).
- 4.9 Taking account of these considerations, the employment land implications of the baseline forecasts are set out below³:

³ Full details of our analysis of the econometric forecasts are set out in Appendices 10-13

Table 4.3 Baseline employment land requirements

	2011-31 land requirement (ha)	Allowance for losses (ha)	GCHQ additional requirement (ha)	Total land requirement (ha)
Experian	87.3	10	20	117.3
CE	-13.7	10	20	16.3
OE	29.6	10	20	59.6
Average	34.4	10	20	64.4

Source: Experian Business Strategies, Oxford Economics, Cambridge Econometrics (2015) / NLP Analysis

Sensitivity tests

Sensitivity 1: No “netting off” of employment land

4.10 The employment forecasts show a loss of jobs in some sectors⁴. Using the floorspace density and plot ratio a strict calculation indicates that there would be a loss of land for these uses. However, a loss of jobs does not automatically result in the release of premises or land and for this reason, where a negative land requirement value has been calculated, this sensitivity assumes that there will be no loss of employment space. In such circumstances, this scenario applies a land requirement of zero. This approach is based upon the importance of avoiding the (unreliable) assumption that all surplus industrial land would be beneficially reused for other employment purposes (including B1a/b) regardless of whether they are actually suited for such purposes. This scenario reflects the approach applied by NLP in its previous reports (dated September 2011 and April 2014).

4.11 Taking account of flexibility allowance, losses since the start of the plan period and the identified GCHQ requirement, this scenario generates the following employment land requirement:

Table 4.4 Scenario 2 employment land requirements

	2011-31 land requirement (ha)	Allowance for losses (ha)	GCHQ additional requirement (ha)	Total land requirement (ha)
Experian	97.5	10	20	127.5
CE	31.6	10	20	61.6
OE	52.6	10	20	82.6
Average	50.3	10	20	80.3

Source: Experian Business Strategies, Oxford Economics, Cambridge Econometrics (2015) / NLP Analysis

⁴ The Experian forecasts anticipate a loss of B” jobs in Cheltenham; CE anticipate a loss of B2 and B8 jobs in Cheltenham, a loss of B1 and B8 jobs in Gloucester and a loss of B2 and B8 jobs in Tewkesbury. OE anticipate a loss of B2 jobs in all three authority areas.

Sensitivity 2: No “netting off” of jobs

4.12 A second alternative scenario was tested in order to reflect the fact that, in assessing employment land requirements and in seeking to ensure that adequate provision is made for future development, job losses in one sector cannot be offset against gains in other sectors within the same use class. For example, it is not appropriate for job losses in heavier forms of manufacturing to be “netted off” against anticipated growth in advanced manufacturing growth. The implication of this might be a failure to provide sufficient employment land for growth sectors, resulting in existing shortages being exacerbated.

4.13 Possible reasons for this include:

- a Sectors may have different land requirements and so it is not possible to assume that land released as a result of job losses in some sectors would be suitable for other sectors in same use class;
- b Job losses would not necessarily result in release of land; and,
- c Different sectors require specific skills and so different people might be employed in these sectors (even though they are still categorised as Use Class B2);

4.14 Under this scenario, where a negative jobs change has been identified by the forecasters for a particular sector, it is assumed that there will be no loss of jobs and a figure of zero is applied. This increases the level of employment growth across the JCS area for the purposes of assessing future land, albeit that there might be opportunities for surplus workers from one sector to seek alternative employment in another sector.

4.15 The employment implications of this scenario that have been used for the purpose of assessing the employment land set out below:

Table 4.5 Forecast employment change in JCS area, 2011-2031 – No “netting off” of jobs scenario

	Experian	OE	CE	Average
Cheltenham	18,770	17,707	13,241	16,573
Gloucester	17,650	7,654	10,126	11,810
Tewkesbury	11,000	6,872	8,845	8,906
JCS Area	47,420	32,233	32,212	37,289

Source: Experian Business Strategies, Oxford Economics, Cambridge Econometrics (2015) / NLP Analysis

4.16 Taking account of flexibility allowance, losses since the start of the plan period and the identified GCHQ requirement, this scenario generates the following employment land requirement:

Table 4.6 Scenario 3 employment land requirements

	2011-31 land requirement (ha)	Allowance for losses (ha)	GCHQ additional requirement (ha)	Total land requirement (ha)
Experian	118.6	10	20	148.6
CE	80	10	20	110
OE	68.7	10	20	98.7
Average	89.1	10	20	119.1

Source: Experian Business Strategies, Oxford Economics, Cambridge Econometrics (2015) / NLP Analysis

Policy-On Approach

4.17

Having testing these alternative scenarios, NLP then considered the implications of a policy-on approach to employment growth. This applied adjustments to the job forecasts for individual sectors, based on discussions with LEP groups. The following adjustments were applied:

Table 4.7 Policy-on adjustments

Sector	Adjustment	Justification
Advanced manufacturing	+5000 jobs over the JCS period	Level of job growth identified by the LEP advanced manufacturing sector group
Retail	+9.6% over the JCS period	National level of employment growth in retail sector identified by Experian. Based on discussion with LEP retail sector group which considered that growth within the JCS area could reflect that of the national level and that Experian is the most reliable forecast given its work in relation to the retail sector.
Creative sector	+20% over the JCS period	Average of the national level of employment growth in the creative sector identified by Experian and CE. OE does not provide a specific figure for the creative sector. This level of growth is above the local average (-17.05%) and is considered to reflect the ambitions for the local area as set out in the SEP.
Energy	+15.05% over the JCS period	Average of the national level of employment growth in the energy sector identified by Experian and CE. OE predict a 17.5% decline in employment in this sector nationally, a figure that is inconsistent with those identified by Experian (16.6%) and CE (13.5%) and which does not reflect the potential for growth in the JCS area.
ICT	+27.4% over the JCS period	Average of the national level of employment growth in ICT sector identified by Experian, CE and OE.
Tourism	+31.4% over the JCS period	The figure for ICT also reflects the comments made by the sector group relating to the growth forecast for technology specialists in

Sector	Adjustment	Justification
Transport	+16.7% over the JCS period	the South West.

Note that the adjustments for creative, tourism and transport are provisional, pending input from the respective LEP sector groups.

4.18 No adjustment has been made to the financial sector as the LEP sector group considered the forecasts provided by the three agencies to be a reasonable representation of future prospects. Furthermore, no adjustment was made to the business and professional services sector as the forecasts anticipate a level of local growth that exceeds the national average level.

4.19 The rationale for these adjustments is that these are key LEP sectors which are crucial to the local economy. If the economy is to perform in line with expectations, aspirations and local policy (as set out in the SEP), it is considered that these sectors will need to perform at a level that (at least) matches the national average. Not all of these adjustments would have an impact upon B Class land requirements but it is important for the strategy to set a target for employment growth as well as a B Class land requirement

4.20 The employment implications of the policy-on approach (in addition to the no netting off of jobs sensitivity set out in paragraphs 4.12 to 4.15) are set out below:

Table 4.8 Forecast employment change in JCS area, 2011-2031 – Policy on scenario

	Experian	OE	CE	Average
Cheltenham	25,823	21,121	16,235	21,059
Gloucester	20,205	11,920	12,909	15,011
Tewkesbury	12,309	9,238	10,082	10,543
JCS Area	55,337	42,279	39,226	46,613

Source: Experian Business Strategies, Oxford Economics, Cambridge Econometrics (2015) / NLP Analysis

4.21 Taking account of flexibility allowance, losses since the start of the plan period, the identified GCHQ requirement and the assumptions underpinning the no netting off of land and no netting off of jobs sensitivities, this scenario generates the following employment land requirement:

Table 4.9 Policy on scenario employment land requirements

	2011-31 land requirement (ha)	Allowance for losses (ha)	GCHQ additional requirement (ha)	Total land requirement (ha)
Experian	207.8	10	20	237.8
CE	128.8	10	20	158.8
OE	147.9	10	20	177.9
Average	161.5	10	20	191.5

Source: Experian Business Strategies, Oxford Economics, Cambridge Econometrics (2015) / NLP Analysis

Implications

- 4.22 The baseline scenario draws solely upon the econometric forecasts undertaken by the three leading agencies. It does not take account of local policies or objectives and is independent of any views of the LEP or those involved in the local economy. Each of the forecasts anticipate a decline in the number of jobs in some sectors and this has a negative impact upon the overall employment land requirement for the JCS area. For this reason, it is not considered that this baseline provides a robust indication of future employment land requirements within the JCS area.
- 4.23 To overcome this difficulty, NLP has applied two alternative sensitivities which assume that any loss of employment within particular use classes or individual sectors will not be “netted off” against other types of employment activity. This approach reflects the reality that different business sectors have different staff and land requirements and so it is not possible to assume transferability of labour or land across the economy. It is also based on the reality that a loss of jobs from individual businesses or sectors would not necessarily result in the release of land that could be used for other purposes. Even where land might be released, the timing of its availability might not align with that of the demand for new land to serve expanding sectors, and so an approach that does seek to “net off” losses against future growth would not necessarily provide the flexibility and choice that the market expects.
- 4.24 Tables 4.5 and 4.6 show that these sensitivities result in a significant increase in the employment land requirement across the JCS area. It is also apparent that the scenarios and sensitivities result in an increasingly narrow range around the average:

Table 4.10 Deviation of each scenario from average position

	Minimum deviation from average	Maximum deviation from average
Baseline	-74.7%	+82.1%
Sensitivity 1	-23.7%	+24.2%
Sensitivity 2	-24.8%	+24.8%
Policy-on	-24.2%	+24.2%

Source: Experian Business Strategies, Oxford Economics, Cambridge Econometrics (2015) / NLP Analysis

- 4.25 This narrowing of the range of figures provided by the different forecasts highlights the extent to which the baseline figure provided by CE in particular assumed a substantial level of loss of employment across the JCS area, which translated into a loss of employment land in the baseline scenario.
- 4.26 Whilst the two no “netting off” sensitivities provide a more reliable indication of future growth in employment land, they remain reliant upon the baseline econometric forecasts. As set out above, these do not take any account of local factors such as policy initiatives or growth objectives. The implication of

this is that they might fail to reflect the level of growth that is likely to occur as a result of specific policy objectives or changing economic circumstances. This was demonstrated through the consultation with the LEP sector groups, many of which expressed concern that the employment growth figures that had been derived from the forecasts were insufficiently ambitious when set against the expectations held by those working within the JCS area. These views were important in shaping the “policy-on” scenario which applies local intelligence to the forecasts and is thereby considered to provide a more reliable indication of the level of employment growth and the associated employment land requirements over the JCS period.

- 4.27 Given the relatively narrow range in the employment land requirements associated with the policy-on scenario, and following the approach that was endorsed by the Inspector into the South Worcestershire Development Plan, NLP recommend that average of the three individual forecasts should form the basis of the land requirement set out within the JCS. Taking account of losses since 2011 and the additional requirement for GCHQ, this amounts to a total land requirement of 192ha. This figure is very closely aligned with that set out in the letter that was prepared by the LEP following consultation with the Construction and Infrastructure sector group.
- 4.28 The JCS should set out overall requirement and make strategic allocations that will deliver a large proportion of this growth. However, it is important also to recognise the role that the individual Local Plans will play in supporting the economy and in helping to deliver non-strategic (smaller) employment land releases. The JCS should therefore provide a clear indication of the level of employment provision that is expected to be provided for within the Local Plans.
- 4.29 In addition, the employment land requirement set out in the JCS should be a minimum not a maximum and should not be used to prevent additional land coming forward (subject to consideration of individual proposals).
- 4.30 The level of job growth set out in Table 4.8 assumes that there will be no job losses in any sector over the JCS period. Support for existing employment should be an economic objective for the local area and the rationale for this approach is set out in respect of Sensitivity 2 above. It is considered that this is a reasonable position to adopt in respect of the assessment of employment land requirements. A failure to apply this adjustment might result in a shortage of employment land, as illustrated by the fact that the recommended level of employment land provision (which draws upon the no netting of jobs sensitivity and the policy-on approach) aligns with the level of land requirement that has been advocated by the LEP.
- 4.31 However, there is a risk that some sectors might experience contraction in the future and that this will impact upon the overall level of growth within the local economy. Whilst this should not have any impact upon the employment land assessment set out above, it might mean that fewer jobs and workers need to be accommodated within the JCS area. We consider that provision should be made for a minimum of 39,500 new jobs between 2011 and 2031 in order to

accord with the positive growth aspirations for the JCS area and to reflect the ambitions of the LEP. This is based upon the application of the policy-on adjustment to the baseline, but without making any adjustment for “no netting off of jobs” – i.e. allowing for a policy-on uplift to the key sectors as set out in Table 4.7, but also taking account of any job losses within individual sectors anticipated by the forecasts.

- 4.32 In seeking to understand future employment growth, NLP would therefore suggest the application of a range of between 39,500 and 46,600 jobs across the JCS area between 2011 and 2031 (between 1,775 and 2,330 jobs p.a. across the three authority areas).
- 4.33 Page 5 of the SEP sets out the ambitious targets that have been set by the GFirst LEP for the period covered by the plan (2015 to 2021). This includes the objective to create 33,909 new jobs and protect a further 2,125 jobs. Table 6 of the SEP sets out projected employment change by sector between 2012 and 2025 of 34,100 jobs, but it is noted that these figures were derived from the Local Economic Forecasting Model (Cambridge Econometrics) and would therefore have been policy-off. This point is noted on page 43 of the SEP:
- “The LEFM model provides a ‘business as usual’ scenario, effectively a picture of the economy without intervention broadly reflecting the continuation of national and local trends. There will always be considerable uncertainty surrounding the future trajectory of the economy and it is the view of the GFirst LEP that the projections may be conservative in the light of the economic opportunities in the area”.*
- 4.34 Against this context, the figures contained within the introduction to the SEP would appear to respond to specific opportunities and aspirations. Whilst these figures relate to the whole of Gloucestershire, it should be noted that, if the annual rate is extended over the whole of the JCS period, it would equate to a figure of over 113,000 new jobs. It is helpful to consider the recommended range set out above against this context.

5.0 Conclusion

- 5.1 This report has been prepared in response to the request for additional information in relation to the JCS housing, retail and employment policies that was issued to the JCS authorities by the Inspector following the Stage 1 examination hearings. It deals solely with the assessment of the future need for employment land across the JCS area; other matters relating to strategy and the distribution of development are being addressed separately by the JCS authorities.
- 5.2 In responding to the matters raised by the Inspector, a new set of employment forecasts have been obtained from Experian Business Strategies, Oxford Economics and Cambridge Econometrics. In addition, the scope of NLP's commission has been extended to consider a policy-on assessment of employment growth, together with an assessment of past trends in employment growth and employment land take-up. This additional work has involved an extensive programme of consultation with key stakeholders and the GFirst LEP has provided valuable support in respect of this.
- 5.3 The current lack of employment land within the JCS area is recognised by many stakeholders as a major issue which threatens the well-being of the economy as it undermines the ability of existing companies to expand and new firms to invest in the area. It has been exacerbated by recent losses of employment land as a result of redevelopment for non-B Class purposes and has resulted in a pent-up demand for employment land. Based upon this analysis, it is evident that an increase from the level of employment land set out in the JCS is now required.
- 5.4 Drawing upon the "policy-on" analysis set out within this report, which was informed by detailed discussions with a wide range of stakeholders active in the local economy, **it is recommended that provision should be made for the development of 192ha B Class employment land across the JCS area between 2011 and 2031.** This figure is exactly aligned with the figure identified by the LEP in its letter of 9 October 2015 (194.2ha)
- 5.5 This figure should, however, be viewed as a minimum rather than a maximum and any opportunities that emerge for additional employment land development should be encouraged, subject to their compliance with relevant national and local planning policies.
- 5.6 The JCS should include strategic allocations and it is anticipated that these will account for the majority of the employment land requirement. However, the emerging Local Plans that are being prepared for each of the individual local authorities also have an important role to play in supporting business growth and the JCS should set out the level of growth that is to be provided through non-strategic allocations within the Local Plans.
- 5.7 Although consideration of the location of development is beyond the scope of this report, the consultation process has identified a number of locations that

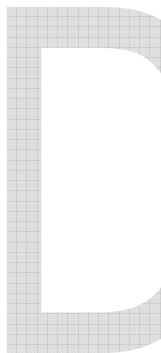
are preferred by the market and careful consideration should be given to these, recognising that some are likely to take a considerable period of time to come forwards, careful attention should be given to delivery in order to ensure that steady supply of land can be maintained for all economic sectors.

5.8

Going forwards, a clear policy position should be established in relation to the protection of employment land. Whilst retaining sufficient flexibility to ensure that sites that are no longer suitable for employment uses or for which there is no employment demand can be redeveloped, it should seek to protect the key employment locations for continued business use. This might comprise a series of criteria relating to the expected marketing requirements and other evidence that would need to be provided to support any proposal for the redevelopment of an existing employment site. It is, however, recognised that some employment land will be released for other purposes, particularly following the announced extension of the office to residential permitted development rights, and this should be carefully monitored by each of the councils.

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Appendix 1 List of potential consultees provided by GFirst LEP



	Company
1	Moog
2	Dowty Propellers
3	Newland Homes
4	Bruton Knowles
5	In2Print
6	Severn Glocon
7	Robert Hitchins
8	St James Place
9	Cotteswold Dairy
10	Sartorius Stedim
11	Crest Nicholson
12	Alder King
13	Formal Investments
14	Richborough Estates
15	Barberry
16	Hunter Page
17	The Old Spot
18	Delphi
19	Triumph Actuation
20	SpiraxSarco
21	Endsleigh
22	Anatwine
23	Crest Nicholson
24	Newbridge Construction Ltd.
25	Robert Hitchins
26	TBS Engineering
27	Peel Properties
28	Nicholas J Upton & Partners
29	Ashville Asset Management
30	Superdry
31	Versarien
32	Spectrum Medical
33	Cotswold Motor Group
34	Blade Group
35	St Modwens
36	Helipebs
37	GE aviation

Appendix 2 List of consultees

NLP contacted 36 local businesses and agents in Gloucestershire and completed telephone interviews or received completed questionnaires from the following companies:

	Company
1	The Old Spot
2	Richborough Estates
3	Barberry
4	Hunter Page
5	Alder King
6	Cotteswold Dairy
7	Newland Homes
8	Robert Hitchins
9	In2Print
10	Dowty Propellers
11	Moog
12	St James Place
13	Bruton Knowles
14	Formal Investments
15	Sartorius Stedim
16	Severn Glocon
17	Crest Nicolson
18	Delphi

Appendix 3 Interview Questions

Your Business

Preliminaries

- 1 How many people does your business employ in Gloucestershire?
- 2 What are the main reasons for it staying here?
- 3 What size of market does your business serve – international, national, regional or local?

Premises/location

- 4 What size of premises and location does your business occupy? E.g. out-of-centre serviced premises, town-centre premises, small industrial park on the edge of town etc.
- 5 How would you rate your current location? Give reasons. Do the premises meet your business requirements?

Expansion needs

- 1 Do you anticipate that your business will grow over the next 5, 10 and 20 years? If so, by how much?
- 2 Will this growth require additional space? How much space would you need?
- 3 Would your business need to / be willing to relocate in order to accommodate this expansion?
- 4 Would you look to move elsewhere if you could not find suitable expansion space locally?

Gloucestershire's Existing Employment Land

- 1 What are your views on the existing supply of employment land in Gloucestershire?
 - a Is there enough available?
 - b Is this the right type?
 - c Is it located in the right locations?
 - d Is the premises/land available at a reasonable price?
- 2 How could the existing employment land supply best be improved?
- 3 What impact is the existing supply of employment land having on businesses in Gloucestershire and upon the local economy?

Future Employment Land

- 1 In your view, what changes are needed to the future supply of employment land in Gloucestershire? Please think about e.g. amount, quality, type and location.

- 2 What sectors do you feel are likely to grow and require new premises/land in Gloucestershire over the next 5, 10 and 20 years?
- 3 What changes may be required to the existing supply of employment land supply to best accommodate these short and long term emerging/growing sectors?
- 4 Do you consider there are any particular opportunities or barriers to providing employment land in Gloucestershire in the future?

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Appendix 4 GCHQ correspondence

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Ciaran Martin
Director General for Cyber Security

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Ref 50459796

Date: 22 July 2015

JCS Inspector Elizabeth Ord LLB (Hons), LL.M, MA, DipTUS
C/O Mr Ian Kemp
Planning Department
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
Gloucestershire

Cc: Cheltenham Borough Council

[Dear Elizabeth]

STAGE 2 MATTERS: FIDDLERS GREEN, CHELTENHAM

Letter to Inspector (Elizabeth Ord LLB (Hons), LL.M, MA, DipTUS) into Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (the JCS). Stage 2 of the Inquiry (7th – 23rd July) will consider Matter 6 (Spatial Strategy), Matter 7 (Green Belt) and Matter 8 (Strategic Allocations).

1. Following receipt of feedback on the progress of the examination in public into the JCS, I am writing to highlight how, as an organisation with an extensive network of industry partners and supply chains, GCHQ can significantly contribute to the growth in the economy of Cheltenham and wider Gloucestershire. As a major employer and investor in the local economy we would welcome the growth opportunities offered by early release from the Green Belt of the safeguarded site west of Cheltenham.

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2. I apologise in advance for not bringing the views contained in this letter to your attention earlier. However, I am sure you will appreciate the number of consultations which need to take place across government departments to ensure a coordinated view. I hope that this letter will assist with your deliberations of the safeguarded land proposed in the Joint Core Strategy (JCS) at west Cheltenham and enable early release of that site.
3. In summary our position (by reference to the JCS Policies) is as follows:
 - GCHQ supports *Policy SA1: Strategic Allocations policy* and, in particular, the allocation of site A5 north west Cheltenham for housing and employment;
 - GCHQ supports the removal of site A5 north west Cheltenham from the existing Green Belt;
 - GCHQ supports the principle within *Policy SD6: Green Belt* of identifying “Safeguarded Areas “. Specifically we support the safeguarding of the area at land west of Cheltenham (shown on inset map 4 in appendix 6 of the JCS) identified at paragraph 7i of *Policy SD6: Green Belt*;
 - GCHQ is supportive, however, of an earlier release of the safeguarded site, without necessarily requiring a review of the JCS.
4. We are currently in active dialogue with Cheltenham Borough Council regarding the medium and longer term business plan of GCHQ and the likely land requirements arising. This engagement has only recently been initiated following internal sign off procedures, hence we have been unable to directly engage with the JCS to date.
5. The Joint Core Strategy defines Cheltenham as a key location for growth along the M5 corridor in support of the *Strategic Economic Plan (SEP)*. The levels of land provision on the strategic site at north west Cheltenham amount to 23.4 hectares whilst additional strategic growth is proposed at Gloucester and Tewkesbury. This level of growth supports the implementation of in

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excess of 12,000 jobs between 2011 and 2031 and forecasts suggest that this will represent an increase of 2.4 per cent 'gross value added' ("GVA").

6. In addition, land is also safeguarded for further development which is currently designated as Green Belt and JCS policies recognise that additional land will be allocated for employment uses through the *Cheltenham Plan*. This includes identifying locations for major office development which will encourage the growth of the economy and provision of high-quality employment in sustainable locations.
 7. The *Strategic Economic Plan*, submitted to Government in March 2014, includes wide ranging ambitions and commitments to deliver 33,900 jobs between 2015 and 2021 and a GVA average annual increase of 4.8 per cent. These ambitions are significantly above both the existing GVA growth in Cheltenham and Gloucestershire and above forecasts used for the analysis in the JCS.
 8. Consultation and views expressed during the SEP consultations highlighted the critical lack of high quality business land and premises and the extent to which large scale sites offer and are seen to be attractive in securing inward investment.
- GCHQ is supportive, therefore, of the settlements of Cheltenham and Gloucester being the focus for the majority of development, making best and efficient use of existing infrastructure and capacity;
 - GCHQ also supports the concept of urban extensions where, as with A5, these are well related to existing urban centres;
 - GCHQ questions, however, whether the strategic allocations, in the absence of early release of the safeguarded land at Hayden, west Cheltenham, are sufficient to meet the need identified in the SEP;

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- GCHQ notes the need identified in the *National Planning Policy Framework* is to plan positively and proactively to encourage sustainable economic growth including the identification of strategic sites for local and inward investment to meet anticipated needs over the planned period – paragraph 21 National Planning Policy Framework;
 - GCHQ notes the *National Planning Policy Framework* also recognises the need for plans to be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. An allowance for early delivery of the safeguarded sites will provide flexibility to accommodate needs and make an allowance for a rapid response to changes in economic circumstances.
9. Cheltenham Borough is currently consulting on the *Cheltenham Plan – Issues and Options*. This consultation aims to establish an economic strategy for the Borough and in doing so identifies an option of driving forward the sector that would deliver economic growth based upon cyber security. GCHQ is well placed to help drive this growth, which together with its supply chain, provide the opportunities to further promote and grow knowledge and a technology based niche within Cheltenham and the wider County.
10. GCHQ and our industry partners provide opportunities to further promote and grow knowledge and a technology based niche within Cheltenham and the wider County. Opportunities for providing suitable sites and premises for new or expanding industry partners to GCHQ are required for the long-term viability of Cheltenham as a leading business services and technology employment location.
11. The pre-condition for this is the availability of suitable sites, well located to GCHQ. This is necessary both in order to support the medium and longer term business plans of GCHQ and/or provide suitable sites and premises for new or expanding industry suppliers. It also has the potential to provide opportunities for existing or new SMEs in this industry sector. As I am sure

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you have heard through the examination sessions to date there is a noted lack of large-scale high grade office and business space in Cheltenham. Through the JCS we have the chance to plan proactively for business and not to miss opportunities as has been the case in the past.

12. Evidence and analysis for the JCS, together with previous work by Cheltenham Borough Council, sets out opportunities for urban extensions to provide a choice of employment sites. Bearing in mind the long lead in time for progress of the strategic allocation at north west Cheltenham, GCHQ's position is that alternative sites should be encouraged and positively considered in response to planning application submissions within the framework of the JCS and the emerging Cheltenham Plan.

13. As a major employer and investor in the local economy we would welcome the growth opportunities offered by early release of safeguarded land at west Cheltenham to be removed from the Green Belt, inter alia, for employment and ancillary uses, which would assist our supply chain partners and technology and innovation ambitions within the JCS Plan Period to 2031. Accordingly we are supportive of representations made in respect of more positive policies for development of safeguarded land at Hayden Cheltenham within the JCS.

[Yours Ever]



Ciaran Martin
GCHQ Director General for Cyber Security

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Appendix 5 Correspondence from LEP
Construction and Infrastructure
Sector Group

DRAFT

9 October 2015



Simon Coop
Nathaniel Lichfield & Partners
Helmont House
Churchill Way
Cardiff
CF10 2HE

Dear Simon

Joint Core Strategy: Employment Land Requirements

Thank you for providing the opportunity to provide additional input into the employment land requirements for the emerging Joint Core Strategy (JCS). These comments have been developed initially by the Construction and Infrastructure Group and subsequently agreed with the Chairs of the ten sector groups and the Business Membership Group of GFirst Local Enterprise Partnership (LEP). These comments are therefore made on behalf of the LEP.

The ten sector groups represent in excess of 75% of the Gloucestershire economy and the Business Membership Group 16,000 Gloucestershire businesses.

We understand that following the employment land sessions of the JCS Examination held on the 18 June 2015, the Inspector has asked that further consultation is undertaken with the LEP and 'Industry' so that local knowledge is included in the economic strategy of the Plan and it is more aligned to the "Policy-on" approach adopted in the SEP.

The LEP's ambition is to drive economic growth in Gloucestershire in partnership with the business community and the public and voluntary sectors. The aim and objective of GFirst LEP is to develop a vision for growing Gloucestershire to ensure that by 2022, the County will have world class companies, a diverse business portfolio and a reputation for starting and growing great businesses. We believe that a strong economy will guarantee that we retain a prosperous and vibrant county.

We agree with the JCS team that, it is paramount to deliver a robust development plan for the area so that each district is capable of delivering an authoritative development strategy beneath this that provides the visions and aspirations of the community. It is apparent at present, that the extant Local Plans covering Cheltenham, Gloucester and Tewkesbury are now time expired and the development strategy contained within each of these is therefore out of date and in urgent need of renewal and replacement. A move to produce new Local

Plans is now underway and therefore it is important that the development strategies in both the JCS and the emerging local plans are consistent and provide sufficient and suitable employment land in the right place and at the right time, to allow our businesses to grow.

In order to provide a robust plan led system it is therefore important that a robust JCS is delivered with speed as it is apparent that it has been a long time in gestation and still has some way to go before adoption.

Compliance with the National Planning Policy Framework

In accordance with the National Planning Policy Framework (the Framework), the JCS should be prepared with the objective of contributing to the achievement of sustainable development and therefore consistent with the policies in the Framework including the presumption in favour of sustainable development. The Plan therefore needs to be aspirational but realistic.

In accordance with the strategic objectives of the Framework, the JCS should have clear policies in order to deliver the homes and jobs needed in the area in conjunction with the provision of retail, leisure and other commercial development.

Fundamentally, the Framework makes it clear that the JCS should plan positively for the development and infrastructure required in the area over the length of the Plan period.

From the outset it is important to set out that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and accordingly planning should operate to *encourage* and not act as an impediment to sustainable growth. The JCS should therefore *take every step* to ensure that significant weight is placed on the need to support economic growth throughout the County. The JCS team should therefore plan proactively to meet the development needs of business and support a robust economy in Gloucestershire.

GFirst LEP is keen to ensure that investment in business is not over-burdened by the requirements of planning policy and it is expected that the forthcoming JCS will be able to address potential barriers to business investment and ensure that there is a sufficient and deliverable supply of employment land to carry the Gloucestershire economy forward.

In accordance with the Framework, GFirst LEP would therefore expect the JCS to provide the following:

- A clear economic vision for the three districts which encourages sustainable economic growth;
- Identify a *range of appropriate and deliverable strategic sites* in accessible locations to provide for growth and inward investment;

- Provide a sensitive rolling back of the Green Belt to facilitate sustainable economic growth;
- Provide positively worded and flexible planning policies to support existing business sectors and plan for emerging sectors that are likely to develop during the plan period; and
- Facilitate flexible working practices such as live/work to nurture new business growth and sustainable working practices.

Using a proportionate evidence base

In order to produce a robust planning strategy for the JCS, it is important that the Local Planning Authority draws upon adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the local area. The production of your development strategies should ensure that strategies for housing, employment and other uses are integrated and take full account of relevant market and economic signals. Paragraph 160 of the Framework also identifies the LEP as a source of information relevant to the development of a robust business strategy in the area. In this case the LEP is in a unique position of talking to businesses across the County and therefore is aware of current market trends and business strategies that will be relevant to the development of the JCS area.

GFirst LEP considers that it will be important to submit a plan which the JCS team considers to be “sound”. To achieve this, the JCS team needs to be confident that their Plan is based on strategies which seek to meet objectively assessed development and infrastructure requirements including unmet requirements from previous plan periods. The strategy of the plan should be able to stand up to scrutiny when considered against reasonably deduced alternatives.

Strategic Economic Plan

GFirst LEP has adopted an ambitious Strategic Economic Plan (SEP) for the County in order to produce significant growth in GVA (*gross value added*). To achieve this ambition requires the County to do significantly better than we have done in previous years which the SEP will achieve by exploiting the opportunities presented by the motorway corridor and doing more to support indigenous businesses growth.

In our discussions with local businesses, we are satisfied that there will be strong local growth and that there is confidence within the business community of continued and strong growth during the JCS plan period.

The SEP will therefore aim to provide the framework to grow the local economy by creating an environment that attracts new high growth potential businesses and promotes the growth of existing businesses already located within the County.

The SEP will specifically aim to ensure that sufficient employment land is available in appropriate locations within the County and with the necessary transport infrastructure demanded by businesses. Within the County there is real potential to exploit some of our strengths, for example:

- High growth potential in some key sectors;
- Our unique asset base in a high quality and well-connected location;
- Our strong knowledge base, providing opportunities for R & D and export; and
- Our resilient and high value employment base.

Some of the barriers to business growth that the Growth Plan hopes to overcome are:

- The need for a planning system that delivers efficiently and consistently for business; and
- To overcome the negative perceptions about the planning process; and
- Ensuring that future development strategies provide high quality employment land where businesses want to be.

There are several exciting opportunities for growth within the County including the potential for development of an M5 Growth Zone and business expansion through High Growth Potential Sectors. Investing in major initiatives along the M5 corridor in Gloucestershire will fuel significant business growth and prosperity throughout the county. New employment land availability will serve latent demand created in the marketplace. The potential of the Growth Zone include:

- Junction 10 has significant potential for development but is effectively sterilised due to the limited access to the M5 – at present traffic can only enter the motorway to travel north and exit to travel south.

Forecasts in the Growth Statement are based on the Local Economic Forecasting Model (LEFM) which predicts the state of the Gloucestershire economy in 2025. The model forecasts that there will be a steady rise in employment across the County between 2012 and 2025. This is also echoed by the businesses that we speak to. Average annual growth of 0.8% will amount to an additional 33,800 jobs over this period. It is predicted that the

highest employment growth sectors will be construction, engineering, finance and insurance, business administration, accommodation and food, and health and care.

The LEFM model has been used to act as a starting point and the Growth Statement acknowledges that the projections may be conservative in the light of the economic development activity already being coordinated. However, the document also notes that the government will aim to achieve economic growth close to the long run trend rate of 2.5% (about 0.7% per quarter). As a consequence LEFM predictions have been taken as a starting point only. They do not reflect planned interventions and further initiatives likely to arise from the Strategic Economic Plan.

It is expected that the overall aims and objectives of the Growth Plan will need to be aligned with the JCS economic strategy now that the SEP is adopted (March 2014).

It is also noted that “Fixing the foundations: Creating a more prosperous nation” (July 2015) produced by HM Treasury sets out that *The UK is set to be the fastest growing G8 economy in both 2014 and 2015, with Gross Domestic Product (GDP) now 4.5% above its pre-crisis peak. Employment is around record levels and has risen by 2 million since the start of the last Parliament, while unemployment is continuing to fall.* The Government also accepts that it needs to increase productivity and aims to do this through encouraging long-term investment and producing a dynamic economy. The LEP believes that long term investment and a dynamic economy can only be encouraged with sufficient land being available to support longer term growth.

GFirst LEP supports the ambition to secure a thriving economy for Gloucestershire. We agree with the need to ensure the right conditions and sufficient land is available in appropriate locations to support existing businesses and attract new ones. However, with regard to Policy SP2: *Distribution of New Development* we are concerned that the provision of 64ha of land to support 28,000 new jobs and 31,040 new homes may be insufficient and will need to be adjusted to support more buoyant growth forecasts.

Historically the county has benefitted significantly from having large, well located employment sites (such as Gloucester Business Park) and there have been many examples of new inward investment as a result of such sites being available. The supply of strategic sites has diminished significantly over recent years to the point where at the key locations within the county, few (if any) opportunities currently exist. The remaining supply of employment land within the JCS area is at an all-time low, with many existing local businesses having no alternative locations to accommodate their expansion requirements. This has been coupled with the loss of older employment land being redeveloped into more valuable uses without any replacement provision being made.

In Tewkesbury (Junction 9) supply is now just 0.75 acre (0.30 ha) being a single plot which is currently under offer. The MOD site at Ashchurch offers potential for commercial, however

the availability and deliverability of this site remains uncertain and accordingly it is considered that it should be removed from the Plan's strategic sites.

Cheltenham has no real employment land supply and historically Cheltenham employers have needed to look outside of the Borough for new build opportunities. This has increased take-up of land in Tewkesbury and in Gloucester. Cheltenham's office supply has also been significantly eroded with land owners and developers utilising permitted development rights to change a large number of office buildings to residential. These have not been replaced. The cumulative loss of employment land needs to be accounted for in the Plan's overall employment land provision.

Whilst there have been well located readily available serviced sites in Gloucester, the take-up in recent years has reduced the number of large plots currently available to the point that this supply could be swallowed with a small number of large developments and within a very short period of time.

In terms of strategic sites for industrial and warehouse use, some 37.8 acres (15.3 ha remain at Gloucester Business Park. A further 13.8 acres (5.6 ha) is available for office use. There are currently three existing buildings within Gloucester Business Park which each sit on operational sites of 13 acres (5.26 ha) and so this remaining land could potentially be developed within a short period of time.

Overall the remaining employment land supply is nearly exhausted and there remains a critical and urgent need to provide new employment land for the JCS area to cater for indigenous expansion, inward investment and the loss of existing employment stock.

Given this introduction and background, the GFirst LEP would like to comment on the following points:

1. The amount of growth required for the JCS area and past trends in employment land provision;
2. The location of future employment allocations and indicative sizes;
3. Comment on the existing strategic allocations within the JCS;
4. The current land supply in the JCS area and its attractiveness to industry; and
5. The Green Belt;

The amount of growth required for the JCS area and past trends in employment land provision

From the outset, the LEP considers that the previous allocations for Gloucester, Cheltenham and Tewkesbury have now been exhausted and in order to provide business confidence there is now a requirement to plan positively to provide for future business growth.

Within the Gloucestershire Structure Plan Second Review provision was made for 267 hectares of new employment land. This comprised of 12 ha within Cheltenham, 95 ha within Gloucestershire and 160 ha within Tewkesbury. The largest part of this employment allocation was the development of Gloucester Business Park which was a planned strategic investment which spent many years in gestation and infrastructure development, and has subsequently proved to be a well-designed and popular business location that is now nearly full.

The LEP consider that a similar amount of employment land should be provided in the JCS area for the next 20 year period (up to 2031) to reflect the growing and robust economy in the area and in order to provide a variety and range of accessible business sites.

The LEP consider that to create further business confidence and investment for the primary county towns, similar planned business parks such as Gloucester Business Park, are required within the JCS area. It is considered that two new business park sites should be established on the safeguarded land at North West Cheltenham as well as land at Hayden Water Reclamation Works or commonly known as '*Fiddlers Green*' (set out in Appendix 6 of the JCS).

The safeguarded land at North West Cheltenham should be designated for "B" Class uses with the relocation of some of the employment designation currently shown in Indicative Site Layout 5 (North West Cheltenham Urban Extension) moved to the safeguarded land. It is considered that the employment allocation at this location should provide between 50 ha of *new* employment land in addition to the already identified 23 ha within the JCS.

The '*Fiddlers Green*' safeguarded land should be utilised for expansion of businesses within this area as well as accommodating associated businesses so that a new "Science Park" can be established for the area that is based on a technology theme. As you know GCHQ are a major employer and investor in the local economy. They have said that they would welcome the growth opportunities offered by early release from the Green Belt of this safeguarded site. In the region of 30 ha of *new* employment land should be allocated at this location.

In addition to this, it is also considered that the following locations are considered for new strategic employment allocations:

1. Gloucestershire Airport - Expansion to the non-essential operational area to allow new B class development and associated uses to the east of the airport. Up to 10 ha;

2. Staverton – identification of new strategic employment land at Staverton (north of Gloucestershire Airport), to allow existing businesses to expand at this popular business location. Up to 20 ha;
3. Extension to the Ashchurch/Fiddington employment area to provide for growth in the north of the JCS area as well as allowing existing businesses in the area to expand. Up to 20 ha.

Gloucestershire Airport is considered to be a valuable asset for the County and the JCS area. The airport operates successfully with regard to a transport hub and has been effective in providing a home for a range of unique aircraft related businesses. Whilst provision has been made for essential airside related businesses, it is considered that the airport offers a unique opportunity for the growth of other businesses that may have a relationship with the airport and its associated businesses but do not necessarily need to be 'air-side'. Aircraft offices and parts suppliers are among the businesses that have expressed an interest at this location. It is therefore considered that a strategic allocation to the east of the airport of up to 10 hectares should be made to promote and encourage the growth of these businesses.

Staverton has evolved into a successful business location serving primarily the Cheltenham and Gloucester area. Many businesses that have not been able to establish business premises in Cheltenham have been drawn to Staverton. The area developed on the back of the aerospace industry but has subsequently evolved into a very popular employment location primarily due to its good access to junction 11 of the motorway. There are a number of high quality business parks at this location such as Ashville Business Park that have been developed during the previous plan period and have been filled immediately. The LEP is aware of numerous business enquiries for additional space in this location from local companies including medical manufacturing companies, car sales and repairs companies, electrical and maintenance businesses. It is considered that a strategic allocation of up to 20 ha should be made in Staverton.

Ashchurch/Fiddington represents an accessible business location around junction 9 of the M5. It is apparent that businesses north of the A46 have thrived and this area is now an established and popular location. There is no further room for business expansion and accordingly further growth at this location is welcomed. It is therefore considered that an additional 20 ha should be provided at Ashchurch/Fiddington to allow for the planned employment growth in the north of the JCS area.

The LEP consider that these allocations should be made in addition to the strategic employment land allocations already identified within the JCS taking the strategic employment land provision within the Plan to 194.2 ha which is 12.8 ha less than the previous plan period.

The growth in employment on these sites reflects the SEP's M5 growth corridor strategy and more closely reflects the past economic trends in the County.

The LEP consider that the addition of the 5 sites above will provide for a more appropriate range and variety of employment sites in more suitable and sustainable locations to meet indigenous business needs. It is also considered that the two primary business locations identified at North West Cheltenham and Fiddlers Green will take a considerable period to develop and accordingly a range of smaller alternative sites, as identified above will allow some flexibility in the market place until the first phases of the larger sites come forward.

The LEP also believe that the JCS team should consider drafting a flexible policy that will allow the expansion of existing established employment sites into adjoining land where this does not create any significant and harmful landscape or other environmental effects.

Comment on the proposed strategic employment sites

There are 4 proposed *strategic* employment sites identified in the JCS. These are:

- 9.1 ha in the Innsworth and Twigworth urban extension;
- 17.4 ha in the south Churchdown urban extension;
- 23.4 ha in the North West Cheltenham urban extension; and
- 14.3 ha in the Ashchurch strategic allocation.

In addition to this there is a further 20 ha proposed in the MOD Ashchurch site, which will be commented on separately.

The actual number of strategic employment sites across the JCS area is currently few and are quite small in size. This is in stark contrast to the previous 20 years where large strategic employment sites such as Gloucester Business Park, Waterwells Business Park and Tewkesbury Business Park were immediately visible, offered significant employment areas and delivered a steady supply of employment land which in turn provided confidence to the business sector.

Innsworth and Twigworth

There are 9.1 ha proposed as part of this urban extension. This allocation represents a logical extension to an existing and established business park and accordingly the allocation is supported. This allocation will help to support a variety and mix of new employment land.

South Churchdown

The location of the South Churchdown site is a good accessible site to serve the employment needs of Gloucester. Overall this location is supported as a business location.

North West Cheltenham

The North West Cheltenham urban extension provides the single largest employment allocation (23.4 ha) within the JCS. While the general location is considered to be appropriate, there remain issues of accessibility with junction 10 of the M5. In addition, it is apparent that the employment land will eventually be surrounded by residential leaving no room for expansion of the site in the future.

It is considered that the employment element of this allocation should be removed from the proposed North West Cheltenham urban extension and moved to the west, into the safeguarded land. This will allow a much larger employment allocation to be accommodated, with the possibility of extending it in the future. A larger quantum of development being proposed in this location (both housing and employment) will also help secure improvements to junction 10 of the M5.

GFirst LEP therefore considers that the 'safeguarded land' to the North West of Cheltenham should be identified and utilised now for employment purposes.

Ashchurch/Fiddington

The Ashchurch strategic allocation comprises of 14.3 ha of employment land. However, we are aware that the landowner of this site is currently promoting the site for a retail development. Whilst the principle of the retail proposal will create good employment, it is considered that additional employment land in Ashchurch/Fiddington should be made to support B class development.

Former MOD Site Ashchurch

The former MOD site is currently in employment use and whilst the regeneration of this site for alternative employment and housing uses would be appropriate, there will always be uncertainty over when this site will be released and therefore over reliance on this site as a strategic allocation for either housing or employment is unwise until the MOD can confirm a definitive timetable.

Existing employment land provision

The LEP has kept a monitor on the existing employment land supply in the JCS area and makes the following observations.

The previous employment land supply has been focused primarily in Tewkesbury Borough. Employment land in Gloucester has been concentrated mainly in Waterwells Business Park

and recycling existing employment land. There has been little new employment development within Cheltenham Borough and conversely, there has been a significant erosion of employment land to housing development.

The Tewkesbury Monitoring Report 2013/14 suggests that there are approximately 53 ha of existing employment land available for development. Following discussions with the Industry and landowners, the following comments can be made on the available supply:

1. Malvern View, Bishops Cleeve – an inefficient back land site of 2.0 ha net with access and constraints;
2. Cleeve Business Park – safeguarded for existing landowners use;
3. Gloucester Business Park – existing supply currently at 20.90 ha;
4. Gloucestershire Airport – supply limited to airside operational users only;
5. Bishops Cleeve/Southam – Safeguarded for existing landowners use.
6. Staverton/Churchdown – Constrained access and deliverability questionable;
7. Tewkesbury/Ashchurch – This site has now been developed to provide a 4,180m² (45,000 ft²) manufacturing facility for an existing Tewkesbury occupier.

This therefore leaves a viable existing supply of 22.90 ha which is considered to be insufficient as part of an ongoing employment land supply. As referred to above the majority of this land could be taken up for development early in the plan period. Accordingly the LEP do not believe that the residual employment land commitments should make up part of the ongoing strategic allocations for the JCS as it is anticipated that the residual supply will be consumed before the Plan is adopted.

Spaceless Growth

It is apparent that the JCS has had some influence from the DCLG's Employment Land Review Guidance Note (December 2004) (ELRGN) (Page 37 of the NLP Report, March 2011). This Note pre-dates the Framework and was written on a now outdated planning policy background. It is considered to be inappropriate to discount employment land supply based on the "Space Implications" raised in the NLP report. In addition the local environment provided in the County and the JCS area has led to the development of many prestigious and headquarters buildings which have adopted high standards of architecture and landscaping. The concept of infilling on these sites would be inappropriate and would serve only to destroy the architectural principles adopted by the companies and the architects they have employed.

Whilst it is accepted that automation has reduced some “shop floor” employment, this investment is associated with growth. The associated growth normally leads to further jobs elsewhere in the company, either in design or managerial positions. The businesses in Gloucestershire have remained entrepreneurial and resilient and the LEP fully anticipates further growth during the plan period.

Whilst Spaceless Growth can absorb some economic growth requirement, it is considered that this type of growth simply provides cramped and undesirable working environments and also creates isolation and demotivation amongst staff. The businesses in the area tend to create working environments that foster greater group working and environments that create communal areas for the amenity of workers.

It is also apparent that the JCS has been in gestation for a period of 7 years, without establishing a clear economic strategy and with former development plans becoming time expired in 2011. In the absence of a development strategy for the last 4 years, most companies have clearly been *forced* to adopt some elements of spaceless growth or have left the area, as the choice and variety of alternative employment sites has not been available.

It is also apparent that with the introduction of the Framework and other permitted development rights, the JCS area has lost a significant amount of employment land and office stock to residential uses in accordance with policy and without the ability to provide more suitable additional employment land to rectify the balance. This has only served to exacerbate the shortage of supply and place additional financial and space pressure on existing employment land and buildings.

It is therefore considered that the spaceless growth discount should be removed and the future employment growth calculated without it.

The Green Belt

The valuable role of the Green Belt is recognised, however it is considered that the review of the Green Belt needs to be updated in order to reflect the growing economy and the need to support business growth at the right time and at the right place. The discounting of potential employment sites because of their location in the Green Belt is considered to be inappropriate as it is apparent that some of the key businesses locations are within the Green Belt and in areas where businesses would like to expand in order to retain staff and consistency of business. These locations are also considered to be more sustainable than some of the strategic allocations in the current JCS.

The LEP therefore consider that a balanced approach needs to be taken with regard to the protection of Green Belt land and the identification of key employment sites. Accordingly, the LEP considers that the rolling back of the Green Belt should be undertaken at Gloucestershire Airport and Staverton to allow expansion and growth of key local businesses.

Summary

GFirst LEP welcomes the opportunity to provide comment on the employment strategy of the JCS. We believe that the comments above reflect what local businesses in the area would like to see in order to promote further business growth and inspire continued confidence during the Plan period.

In summary, it is considered that there is a requirement for:

- The provision of an additional 130 ha of new employment land over and above the 64.2 ha already identified. The suggestions are as follows:

▪ Aschurch/Fiddington	20ha
▪ NW Cheltenham	50ha
▪ Fiddlers Green	30ha
▪ Gloucestershire Airport	10ha
▪ Staverton	20ha

- Two new strategic business park locations at North West Cheltenham and Fiddlers Green.

- It is considered that the Fiddlers Green allocation will provide for a technology based Business Park for businesses in the local area.

- North West Cheltenham will create a centre for new office and commercial development and should stimulate improvements to the junction 10 of the M5.

- It is recognised that larger business parks will take some time in which to be developed and subsequently occupied. Accordingly it is considered that further smaller general purposes employment sites should be provided at Gloucestershire Airport, Staverton and Ashchurch/Fiddington in addition to the already identified strategic sites within the JCS.

- Given the sustainable location of both Gloucestershire airport and Staverton, it is considered that further rolling back of the Green Belt needs to be accommodated at this stage to allow for further sustainable economic growth.

- It is considered that a further policy be added to the JCS that allows for the sympathetic expansion of existing employment sites onto adjoining land where this does not cause harm.
- It should be emphasised that that these sites and allocations have not been agreed with all the relevant stakeholders.

We trust these comments have been of assistance but please do not hesitate to contact us should you need any further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D Owen', with a long horizontal flourish extending to the right.

David Owen

Chief Executive

GFirst Local Enterprise Partnership

Appendix 6 Cheltenham employment monitoring data

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	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	Total
Delivery of B use class land									
B1 Land delivered (ha)	1.3966	0.828	0.673	0.487		3.628	1.76	0.03	7.406
B2 Land delivered (ha)	0.4774	1.21	0.245	0.55		0.005	0.2	3.07	5.28
B8 Land delivered (ha)	0.6707	1.43	0.364	0		1.649	0.23	0.05	3.723
<i>Total B class land delivered (ha)</i>	2.5447	3.468	1.282	1.037	N/A	5.282	2.19	3.15	16.409
Loss of B class land to other uses									
A1 (ha)	0.114	0	0	0		0.002	0.0059	0	0.1219
A2 (ha)	0.026	0	0	0		0.00685	0.0126	0	0.04545
A3 (ha)		0	0	0		0	0.014	0	0.014
A4 (ha)		0	0	0		0	0	0	0
A5 (ha)		0	0	0		0	0	0	0
C1 (ha)	0.2	0	0	0		0	0	0.1056	0.3056
C2 (ha)		0	0.02247	0		0	0	0.2803	0.30277
C2A (ha)		0	0	0		0	0	0	0
C3 (ha)	0.184	1.518	0	0.17965		0.138796	0.246	0.0941	2.360546
C4 (ha)		0	0	0		0.00725	0	0	0.00725
D1 (ha)	0.015	0.515	0.0183	0		0.0267	0.030063	0.0225	0.627563
D2 (ha)	0.037	0	0.51077	0.1895		0.0418	0.1126	0	0.89167
Sui generis (ha)	0.123	0	0.2927	0.01468		0.031	0	0.1323	0.59368
<i>Total loss of B class land (ha)</i>	0.699	2.033	0.84424	0.38383		0.254396	0.421163	0.6348	5.270429
Net take-up of B class land (ha)	1.8457	1.435	0.43776	0.65317	N/A	5.027604	1.768837	2.5152	11.13857

Appendix 7 Loss of employment land in
Cheltenham

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Building	Approx Net Floor Area (sqft)
Chelsea B S, Thirlstaine Road	77,000
Kraft, St. George's Road	57,000
John Dower House	28,000
Westbury House, Lansdown Road	34,000
Echo, Clarence Parade	15,000
Inland Revenue, Parabola Road	17,000
10/11 Bath Street	11,000
Regent House, Rodney Road	15,000
Gov Office, Rivershill House	38,000
Brandon House, Painswick Road	4,000
Oriel Villas, Oriel Road	7,000
Pate Court	27,000
Various Imperial Square	9,000
Parts Eagle Tower	10,000
Clarke Nicholls, Tivoli	3,000
DIS Bath Road	7,000
Ullenwood Court (Cotswold District but Cheltenham Market)	30,000
Cantay South Court	10,000
Victoria House, St James	7,500
Carlton Coach Works	4,000
Premier Products, Bouncers Lane	16,000
Vulcan Works, Leckhampton	30,000
Works Windsor Street	27,000
Spirax Sarco, St. George's Road	40,000
Total	523,500

There are also a considerable number of units under 1,500 which have not been quantified.

Appendix 8 Gloucester employment
monitoring data

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Delivery of B use class land	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/12 ⁵	2012/14	Total
B1 Land delivered (ha)	8.75	2.32	2.00	0.06	0.14	0.85	0.78	0.00	14.90
B2 Land delivered (ha)	0.09	0.33	0.00	0.36	0.07	0.02	0.06	0.00	0.93
B8 Land delivered (ha)	4.52	1.05	0.02	0.00	2.37	2.57	8.60 ⁶	8.18 ⁷	27.31
<i>Total B class land delivered (ha)</i>	13.36	3.70	2.02	0.42	2.59	3.44	9.44	8.18	43.15

Loss of B class land to other uses									
A1 (ha)	0.00	0.64	0.00	0.00	0.02	0.00	0.00	7.61 ⁸	8.27
A2 (ha)	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.02
A3 (ha)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
A4 (ha)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
A5 (ha)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
C1 (ha)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
C2 (ha)	0.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.20
C2A (ha)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
C3 (ha)	0.01	11.29 ⁹	0.05	0.01	0.07	0.16	27.14 ¹⁰	31.39 ¹¹	70.11
C4 (ha)	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01
D1 (ha)	0.32	0.32	0.00	0.00	0.00	0.15	0.00	0.00	0.79
D2 (ha)	0.00	0.00	0.00	0.00	0.06	0.01	0.00	0.00	0.07
Sui generis (ha)	0.00	0.72	0.01	0.00	0.04	0.00	1.30	3.72	5.79
<i>Total loss of B class land (ha)</i>	0.53	13.00	0.06	0.01	0.18	0.32	28.44	42.72	85.26

⁵ Note the change from annual to biannual monitoring

⁶ Includes the 'Walls' fridge storage unit

⁷ Includes large Bristol Road site used for open storage

⁸ Local centre at Kingsway, ASDA and Morrisons

⁹ Includes part of urban extension at RAF Quedgeley Framework plan 1

¹⁰ Includes part of urban extension at RAF Quedgeley Framework plans 2/3/4

¹¹ Includes part of urban extension at RAF Quedgeley Framework plans 2/3/4

Net take-up of B class land (ha)	12.83	-9.30	1.96	0.41	2.41	3.12	-19.00	-34.54	-14.54
Allocated B use class land delivered as B uses (ha)	0.00	1.30	0.00	0.00	0.00	0.00	7.67	8.18	17.15
Allocated B use class land delivered as other non B uses (ha)								7.61	
Remaining allocated B use class land (not delivered) (ha)	51.14	49.84	49.84	49.84	49.84	49.84	42.17	26.38	
B use class land delivered on non-allocated sites (ha)	13.36	2.40	2.02	0.42	2.59	3.44	1.77	0	26

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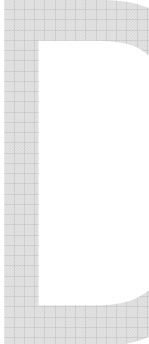
Appendix 9 Tewkesbury employment
monitoring data

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Land developed for employment use by year (ha, 2004 – 2014)

Monitoring year	Land developed for employment (ha)
2004/5	0.55
2005/6	18.87
2006/7	21.15
2007/8	10
2008/9	2.48
2009/10	3.76
2010/11	Data not available
2011/12	Data not available
2012/13	12.3
2013/14	2

Floorspace developed for employment use by year (sqm, 2004 – 2014)



	B1	B2	B8	Total
2004/5	No Data			
2005/6	9,839	7,240	16,039	33,118
2006/7	9,867	9,296	5,006	24,169
2007/8	20,438	11,775	5,121	37,334
2008/9	11,912	22,548	220	34,680
2009/10	No Data			
2010/11	No Data			
2011/12	No Data			
2012/13	No Data			
2013/14	792	3,138	1,184	5,114
Total	52,848	53,997	27,570	134,415

Appendix 10 Analysis of Experian Forecasts

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Experian Baseline

LA Area	Use Class	2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	22.742	32.425	9683	121042	24.2	6.1	30.3
	B2	6.730	5.850	-881	-32582	-8.1	-2	-10.2
	B8	2.593	2.787	195	12670	3.2	0.8	4.0
	Other	44.825	51.848	7022				
	B Class	32.065	41.062	8998	101130	19.2	4.8	24.0
	Total	76.890	92.910	16020				
Gloucester	B1	17.570	21.427	3857	48217	9.6	2.4	12.1
	B2	6.535	7.249	714	26413	6.6	1.7	8.3
	B8	4.101	4.605	504	32734	8.2	2.0	10.2
	Other	45.254	56.159	10905				
	B Class	28.206	33.281	5075	107364	24.4	6.1	30.5
	Total	73.460	89.440	15980				
Tewkesbury	B1	9.834	13.057	3223	40290	8.1	2.0	10.1
	B2	10.061	11.158	1097	40599	10.1	2.5	12.7
	B8	2.947	3.437	490	31871	8.0	2.0	10.0
	Other	18.559	23.868	5309				
	B Class	22.841	27.652	4811	112760	26.2	6.5	32.7
	Total	41.400	51.520	10120				
JCS	B1	50.146	66.909	16764	209548	41.9	10.5	52.4

	B2	23.326	24.257	931	34430	8.6	2.2	10.8
	B8	9.641	10.829	1189	77275	19.3	4.8	24.1
	Other	108.638	131.874	23237				
	B Class	83.112	101.996	18883	321253	69.8	17.5	87.3
	Total	191.750	233.870	42120				

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Experian Sensitivity 1: no netting off of employment land

LA Area	Use Class	2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	22.742	32.425	9683	121042	24.2	6.1	30.3
	B2	6.730	5.850	-881	-32582	0.0	0.0	0.0
	B8	2.593	2.787	195	12670	3.2	0.8	4.0
	Other	44.825	51.848	7022				
	B Class	32.065	41.062	8998	101130	27.4	6.8	34.2
	Total	76.890	92.910	16020				
Gloucester	B1	17.570	21.427	3857	48217	9.6	2.4	12.1
	B2	6.535	7.249	714	26413	6.6	1.7	8.3
	B8	4.101	4.605	504	32734	8.2	2.0	10.2
	Other	45.254	56.159	10905				
	B Class	28.206	33.281	5075	107364	24.4	6.1	30.5
	Total	73.460	89.440	15980				
Tewkesbury	B1	9.834	13.057	3223	40290	8.1	2.0	10.1
	B2	10.061	11.158	1097	40599	10.1	2.5	12.7
	B8	2.947	3.437	490	31871	8.0	2.0	10.0
	Other	18.559	23.868	5309				
	B Class	22.841	27.652	4811	112760	26.2	6.5	32.7
	Total	41.400	51.520	10120				
JCS	B1	50.146	66.909	16764	209548	41.9	10.5	52.4
	B2	23.326	24.257	931	34430	16.8	4.2	20.9

	B8	9.641	10.829	1189
	Other	108.638	131.874	23237
	B Class	83.112	101.996	18883
	Total	191.750	233.870	42120

77275	19.3	4.8	24.1
321253	78.0	19.5	97.5

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Experian Sensitivity 2: No netting off of jobs

LA Area		2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	22.742	32.783	10041	125515	25.1	6.3	31.4
	B2	6.730	7.230	499	18478	4.6	1.2	5.8
	B8	2.593	2.787	195	12670	3.2	0.8	4.0
	Other	44.825	52.860	8034				
	B Class	32.065	42.800	10736	156663	32.9	8.2	41.1
	Total	76.890	95.660	18770				
Gloucester	B1	17.570	21.991	4421	55265	11.1	2.8	13.8
	B2	6.535	7.799	1264	46763	11.7	2.9	14.6
	B8	4.101	4.605	504	32734	8.2	2.0	10.2
	Other	45.254	56.715	11461				
	B Class	28.206	34.395	6189	134763	30.9	7.7	38.7
	Total	73.460	91.110	17650				
Tewkesbury	B1	9.834	13.308	3474	43426	8.7	2.2	10.9
	B2	10.061	11.618	1557	57619	14.4	3.6	18.0
	B8	2.947	3.437	490	31871	8.0	2.0	10.0
	Other	18.559	24.037	5478				
	B Class	22.841	28.363	5522	132916	31.1	7.8	38.8
	Total	41.400	52.400	11000				
JCS	B1	50.146	68.082	17936	224206	44.8	11.2	56.1
	B2	23.326	26.647	3321	122860	30.7	7.7	38.4

	B8	9.641	10.829	1189	77275	19.3	4.8	24.1
	Other	108.638	133.612	24974				
	B Class	83.112	105.558	22446	424341	94.9	23.7	118.6
	Total	191.750	239.170	47420				

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Experian Policy-On Scenario

LA Area		2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	22.742	33.190	10449	130610	26.1	6.5	32.7
	B2	6.730	12.150	5419	200518	50.1	12.5	62.7
	B8	2.593	2.893	300	19507	4.9	1.2	6.1
	Other	44.825	54.480	9654				
	B Class	32.065	48.233	16168	350635	81.1	20.3	101.4
	Total	76.890	102.713	25823				
Gloucester	B1	17.570	22.168	4598	57469	11.5	2.9	14.4
	B2	6.535	8.970	2435	90090	22.5	5.6	28.2
	B8	4.101	4.733	631	41047	10.3	2.6	12.8
	Other	45.254	57.795	12541				
	B Class	28.206	35.870	7664	188606	44.3	11.1	55.3
	Total	73.460	93.665	20205				
Tewkesbury	B1	9.834	13.567	3733	46662	9.3	2.3	11.7
	B2	10.061	12.447	2386	88292	22.1	5.5	27.6
	B8	2.947	3.526	579	37632	9.4	2.4	11.8
	Other	18.559	24.169	5611				
	B Class	22.841	29.540	6698	172586	40.8	10.2	51.0
	Total	41.400	53.709	12309				
JCS	B1	50.146	68.925	18779	234741	46.9	11.7	58.7
	B2	23.326	33.567	10241	378900	94.7	23.7	118.4

	B8	9.641	11.151	1511	98186	24.5	6.1	30.7
	Other	108.638	136.444	27806				
	B Class	83.112	113.643	30530	711827	166.2	41.6	207.8
	Total	191.750	250.087	58337				

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Appendix 11 Analysis of Cambridge
Econometrics Forecasts

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CE Baseline

LA Area	Use Class	2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	18.584	25.286	6702	83773	16.8	4.2	20.9
	B2	6.568	5.360	-1209	-44718	-11.2	-2.8	-14.0
	B8	2.401	1.633	-768	-49951	-12.5	-3.1	-15.6
	Other	43.044	45.947	2903				
	B Class	27.553	32.278	4725	-10897	-6.9	-1.7	-8.6
	Total	70.597	78.225	7628				
Gloucester	B1	16.473	16.065	-409	-5107	-1.0	-0.3	-1.3
	B2	5.680	6.397	718	26555	6.6	1.7	8.3
	B8	3.215	2.998	-217	-14136	-3.5	-0.9	-4.4
	Other	40.594	45.752	5158				
	B Class	25.368	25.460	92	7312	2.1	0.5	2.6
	Total	65.962	71.212	5250				
Tewkesbury	B1	11.188	11.943	756	9445	1.9	0.5	2.4
	B2	10.211	9.562	-649	-24012	-6.0	-1.5	-7.5
	B8	3.089	2.963	-125	-8137	-2.0	-0.5	-2.5
	Other	20.572	25.232	4660				
	B Class	24.488	24.469	-19	-22704	-6.1	-1.5	-7.7
	Total	45.060	49.701	4641				
JCS	B1	46.245	53.293	7049	88111	17.6	4.4	22.0

	B2	22.459	21.319	-1140	-42175	-10.5	-2.6	-13.2
	B8	8.705	7.594	-1111	-72224	-18.1	-4.5	-22.6
	Other	104.210	116.931	12721				
	B Class	77.409	82.207	4798	-26289	-11.0	-2.7	-13.7
	Total	181.619	199.138	17519				

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CE Sensitivity 1: no netting off of employment land

LA Area	Use Class	2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	18.584	25.286	6702	83773	16.8	4.2	20.9
	B2	6.568	5.360	-1209	-44718	0.0	0.0	0.0
	B8	2.401	1.633	-768	-49951	0.0	0.0	0.0
	Other	43.044	45.947	2903				
	B Class	27.553	32.278	4725	-10897	16.8	4.2	20.9
	Total	70.597	78.225	7628				
Gloucester	B1	16.473	16.065	-409	-5107	0.0	0.0	0.0
	B2	5.680	6.397	718	26555	6.6	1.7	8.3
	B8	3.215	2.998	-217	-14136	0.0	0.0	0.0
	Other	40.594	45.752	5158				
	B Class	25.368	25.460	92	7312	6.6	1.7	8.3
	Total	65.962	71.212	5250				
Tewkesbury	B1	11.188	11.943	756	9445	1.9	0.5	2.4
	B2	10.211	9.562	-649	-24012	0.0	0.0	0.0
	B8	3.089	2.963	-125	-8137	0.0	0.0	0.0
	Other	20.572	25.232	4660				
	B Class	24.488	24.469	-19	-22704	1.9	0.5	2.4
	Total	45.060	49.701	4641				
JCS	B1	46.245	53.293	7049	88111	18.6	4.7	23.3
	B2	22.459	21.319	-1140	-42175	0.0	1.7	8.3

	B8	8.705	7.594	-1111	-72224	0.0	0.0	0.0
	Other	104.210	116.931	12721				
	B Class	77.409	82.207	4798	-26289	25.3	6.3	31.6
	Total	181.619	199.138	17519				

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CE Sensitivity 2: No netting off of jobs

LA Area		2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	18.584	26.064	7481	93508	18.7	4.7	23.4
	B2	6.568	6.944	376	13912	3.5	0.9	4.3
	B8	2.401	2.458	57	3675	0.9	0.2	1.1
	Other	43.044	48.372	5328				
	B Class	27.553	35.466	7913	111095	23.1	5.8	28.9
	Total	70.597	83.838	13241				
Gloucester	B1	16.473	17.642	1169	14606	2.9	0.7	3.7
	B2	5.680	7.269	1589	58808	14.7	3.7	18.4
	B8	3.215	3.215	0	0	0.0	0.0	0.0
	Other	40.594	47.962	7368				
	B Class	25.368	28.126	2758	73414	17.6	4.4	22.0
	Total	65.962	76.088	10126				
Tewkesbury	B1	11.188	12.826	1639	20483	4.1	1.0	5.1
	B2	10.211	11.739	1528	56519	14.1	3.5	17.7
	B8	3.089	3.399	311	20203	5.1	1.3	6.3
	Other	20.572	25.940	5368				
	B Class	24.488	27.965	3477	97206	23.3	5.8	29.1
	Total	45.060	53.905	8845				
JCS	B1	46.245	56.532	10288	128597	25.7	6.4	32.1
	B2	22.459	25.952	3493	129239	0.0	8.1	40.4

	B8	8.705	9.072	367	23878	0.0	1.5	7.5
	Other	104.210	122.274	18064				
	B Class	77.409	91.557	14148	281715	64.0	16.0	80.0
	Total	181.619	213.831	32212				

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CE Policy-On Scenario

LA Area		2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	18.584	26.278	7694	96174	19.2	4.8	24.0
	B2	6.568	8.408	1840	68080	17.0	4.3	21.3
	B8	2.401	2.496	95	6201	1.6	0.4	1.9
	Other	43.044	49.650	6606				
	B Class	27.553	37.182	9629	170455	37.8	9.5	47.3
	Total	70.597	86.832	16235				
Gloucester	B1	16.473	17.922	1449	18110	3.6	0.9	4.5
	B2	5.680	8.320	2640	97695	24.4	6.1	30.5
	B8	3.215	3.468	253	16422	4.1	1.0	5.1
	Other	40.594	49.161	8567				
	B Class	25.368	29.710	4342	132226	32.2	8.0	40.2
	Total	65.962	78.871	12909				
Tewkesbury	B1	11.188	12.874	1686	21079	4.2	1.1	5.3
	B2	10.211	12.783	2572	95147	23.8	5.9	29.7
	B8	3.089	3.399	311	20203	5.1	1.3	6.3
	Other	20.572	26.086	5514				
	B Class	24.488	29.056	4569	136429	33.1	8.3	41.3
	Total	45.060	55.142	10082				
JCS	B1	46.245	57.074	10829	135363	27.1	6.8	33.8
	B2	22.459	29.511	7052	260922	0.0	16.3	81.5

	B8	8.705	9.364	659	42826	0.0	2.7	13.4
	Other	104.210	124.897	20687				
	B Class	77.409	95.949	18540	439111	103.0	25.8	128.8
	Total	181.619	220.846	39227				

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Appendix 12 Analysis of Oxford Economics Forecasts

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OE Baseline

LA Area	Use Class	2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	20.031	31.469	11437	142968	28.6	7.1	35.7
	B2	6.221	5.083	-1138	-42110	-10.5	-2.6	-13.2
	B8	3.238	3.293	55	3587	0.9	0.2	1.1
	Other	38.601	42.558	3956				
	B Class	29.490	39.845	10354	104444	19.0	4.7	23.7
	Total	68.092	82.402	14311				
Gloucester	B1	17.437	17.754	317	3968	0.8	0.2	1.0
	B2	5.786	5.302	-484	-17917	-4.5	-1.1	-5.6
	B8	3.860	3.917	57	3674	0.9	0.2	1.1
	Other	40.975	44.242	3268				
	B Class	27.083	26.972	-110	-10275	-2.8	-0.7	-3.5
	Total	68.057	71.215	3158				
Tewkesbury	B1	12.461	13.578	1117	13968	2.8	0.7	3.5
	B2	10.351	9.985	-366	-13538	-3.4	-0.8	-4.2
	B8	2.565	3.064	498	32382	8.1	2.0	10.1
	Other	21.122	25.126	4004				
	B Class	25.377	26.627	1250	32812	7.5	1.9	9.4
	Total	46.499	51.753	5253				
JCS	B1	49.928	62.801	12872	160904	32.2	8.0	40.2

	B2	22.359	20.370	-1988	-73564	-18.4	-4.6	-23.0
	B8	9.663	10.273	610	39642	9.9	2.5	12.4
	Other	100.698	111.926	11228				
	B Class	81.950	93.444	11494	126982	23.7	5.9	29.6
	Total	182.648	205.370	22722				

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OE Sensitivity 1: no netting off of employment land

LA Area	Use Class	2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	20.031	31.469	11437	142968	28.6	7.1	35.7
	B2	6.221	5.083	-1138	-42110	0.0	0.0	0.0
	B8	3.238	3.293	55	3587	0.9	0.2	1.1
	Other	38.601	42.558	3956				
	B Class	29.490	39.845	10354	104444	29.5	7.4	36.9
	Total	68.092	82.402	14311				
Gloucester	B1	17.437	17.754	317	3968	0.8	0.2	1.0
	B2	5.786	5.302	-484	-17917	0.0	0.0	0.0
	B8	3.860	3.917	57	3674	0.9	0.2	1.1
	Other	40.975	44.242	3268				
	B Class	27.083	26.972	-110	-10275	1.7	0.4	2.1
	Total	68.057	71.215	3158				
Tewkesbury	B1	12.461	13.578	1117	13968	2.8	0.7	3.5
	B2	10.351	9.985	-366	-13538	0.0	0.0	0.0
	B8	2.565	3.064	498	32382	8.1	2.0	10.1
	Other	21.122	25.126	4004				
	B Class	25.377	26.627	1250	32812	10.9	2.7	13.6
	Total	46.499	51.753	5253				
JCS	B1	49.928	62.801	12872	160904	32.2	8.0	40.2
	B2	22.359	20.370	-1988	-73564	0.0	0.0	0.0

	B8	9.663	10.273	610
	Other	100.698	111.926	11228
	B Class	81.950	93.444	11494
	Total	182.648	205.370	22722

39642	9.9	2.5	12.4
126982	42.1	10.5	52.6

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OE Sensitivity 2: No netting off of jobs

LA Area		2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	20.031	32.055	12024	150299	30.1	7.5	37.6
	B2	6.221	6.439	218	8062	2.0	0.5	2.5
	B8	3.238	3.310	72	4695	1.2	0.3	1.5
	Other	38.601	43.994	5393				
	B Class	29.490	41.804	12314	163056	33.2	8.3	41.6
	Total	68.092	85.799	17707				
Gloucester	B1	17.437	19.346	1910	23870	4.8	1.2	6.0
	B2	5.786	5.961	175	6484	1.6	0.4	2.0
	B8	3.860	3.917	57	3674	0.9	0.2	1.1
	Other	40.975	46.487	5512				
	B Class	27.083	29.224	2141	34028	7.3	1.8	9.1
	Total	68.057	75.711	7654				
Tewkesbury	B1	12.461	14.002	1541	19267	3.9	1.0	4.8
	B2	10.351	10.612	261	9643	2.4	0.6	3.0
	B8	2.565	3.064	498	32382	8.1	2.0	10.1
	Other	21.122	25.693	4571				
	B Class	25.377	27.677	2300	61292	14.4	3.6	17.9
	Total	46.499	53.371	6872				
JCS	B1	49.928	65.403	15475	193436	38.7	9.7	48.4
	B2	22.359	23.013	654	24190	6.0	1.5	7.6

	B8	9.663	10.290	627	40750	10.2	2.5	12.7
	Other	100.698	116.174	15477				
	B Class	81.950	98.706	16756	258376	54.9	13.7	68.7
	Total	182.648	214.880	32232				

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OE Policy-On Scenario

LA Area		2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	20.031	32.803	12772	159651	31.9	8.0	39.9
	B2	6.221	8.145	1924	71188	17.8	4.4	22.2
	B8	3.238	3.596	358	23296	5.8	1.5	7.3
	Other	38.601	44.668	6066				
	B Class	29.490	44.545	15055	254135	55.6	13.9	69.4
	Total	68.092	89.212	21121				
Gloucester	B1	17.437	19.881	2445	30559	6.1	1.5	7.6
	B2	5.786	7.675	1889	69883	17.5	4.4	21.8
	B8	3.860	4.337	477	31004	7.8	1.9	9.7
	Other	40.975	48.084	7110				
	B Class	27.083	31.893	4810	131446	31.3	7.8	39.2
	Total	68.057	79.977	11920				
Tewkesbury	B1	12.461	14.661	2201	27509	5.5	1.4	6.9
	B2	10.351	12.279	1928	71332	17.8	4.5	22.3
	B8	2.565	3.064	498	32382	8.1	2.0	10.1
	Other	21.122	25.733	4611				
	B Class	25.377	30.004	4627	131222	31.4	7.9	39.3
	Total	46.499	55.737	9238				
JCS	B1	49.928	67.346	17418	217719	43.5	10.9	54.4
	B2	22.359	28.099	5741	212403	53.1	13.3	66.4

	B8	9.663	10.997	1334	86681	21.7	5.4	27.1
	Other	100.698	118.485	17787				
		0.000	0.000					
	B Class	81.950	106.442	24492	516803	118.3	29.6	147.9
	Total	182.648	224.927	42279				

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Appendix 13 Analysis of average of Experian,
CE and OE Forecasts

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Average Baseline

LA Area	Use Class	2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	20.452	29.726	9274	115927	23.2	5.8	29.0
	B2	6.507	5.431	-1076	-39803	-10.0	-2.5	-12.4
	B8	2.744	2.571	-173	-11232	-2.8	-0.7	-3.5
	Other	42.157	46.784	4627				
	B Class	29.703	37.728	8026	64892	10.4	2.6	13.0
	Total	71.860	84.512	12653				
Gloucester	B1	17.160	18.415	1255	15693	3.1	0.8	3.9
	B2	6.000	6.316	316	11684	2.9	0.7	3.7
	B8	3.726	3.840	114	7424	1.9	0.5	2.3
	Other	42.274	48.718	6444				
	B Class	26.886	28.571	1685	34800	7.9	2.0	9.9
	Total	69.160	77.289	8129				
Tewkesbury	B1	11.161	12.860	1699	21234	4.2	1.1	5.3
	B2	10.208	10.235	27	1016	0.3	0.1	0.3
	B8	2.867	3.155	288	18705	4.7	1.2	5.8
	Other	20.084	24.742	4658				
	B Class	24.235	26.249	2014	40956	9.2	2.3	11.5
	Total	44.320	50.991	6671				
JCS	B1	48.773	61.001	12228	152854	30.6	7.6	38.2

	B2	22.715	21.982	-733	-27103	-6.8	-1.7	-8.5
	B8	9.336	9.565	229	14897	3.7	0.9	4.7
	Other	104.515	120.244	15729				
	B Class	80.824	92.549	11725	140649	27.5	6.9	34.4
	Total	185.339	212.793	27454				

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Average Sensitivity 1: no netting off of employment land

LA Area	Use Class	2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	20.452	29.726	9274	115927	23.2	5.8	29.0
	B2	6.507	5.431	-1076	-39803	0.0	0.0	0.0
	B8	2.744	2.571	-173	-11232	0.0	0.0	0.0
	Other	42.157	46.784	4627				
	B Class	29.703	37.728	8026	64892	23.2	5.8	29.0
	Total	71.860	84.512	12653				
Gloucester	B1	17.160	18.415	1255	15693	3.1	0.8	3.9
	B2	6.000	6.316	316	11684	2.9	0.7	3.7
	B8	3.726	3.840	114	7424	1.9	0.5	2.3
	Other	42.274	48.718	6444				
	B Class	26.886	28.571	1685	34800	7.9	2.0	9.9
	Total	69.160	77.289	8129				
Tewkesbury	B1	11.161	12.860	1699	21234	4.2	1.1	5.3
	B2	10.208	10.235	27	1016	0.3	0.1	0.3
	B8	2.867	3.155	288	18705	4.7	1.2	5.8
	Other	20.084	24.742	4658				
	B Class	24.235	26.249	2014	40956	9.2	2.3	11.5
	Total	44.320	50.991	6671				
JCS	B1	48.773	61.001	12228	152854	30.6	7.6	38.2
	B2	22.715	21.982	-733	-27103	3.2	0.8	4.0

	B8	9.336	9.565	229
	Other	104.515	120.244	15729
	B Class	80.824	92.549	11725
	Total	185.339	212.793	27454

14897	6.5	1.6	8.2
140649	40.3	10.1	50.3

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Average Sensitivity 2: No netting off of jobs

LA Area		2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	20.452	30.301	9849	123107	24.6	6.2	30.8
	B2	6.507	6.871	364	13484	3.4	0.8	4.2
	B8	2.744	2.852	108	7013	1.8	0.4	2.2
	Other	42.157	48.409	6252				
	B Class	29.703	40.023	10321	143604	29.7	7.4	37.2
	Total	71.860	88.432	16573				
Gloucester	B1	17.160	19.660	2500	31247	6.2	1.6	7.8
	B2	6.000	7.010	1010	37352	9.3	2.3	11.7
	B8	3.726	3.912	187	12136	3.0	0.8	3.8
	Other	42.274	50.388	8114				
	B Class	26.886	30.582	3696	80735	18.6	4.7	23.3
	Total	69.160	80.970	11810				
Tewkesbury	B1	11.161	13.379	2218	27725	5.5	1.4	6.9
	B2	10.208	11.323	1115	41261	10.3	2.6	12.9
	B8	2.867	3.300	433	28152	7.0	1.8	8.8
	Other	20.084	25.224	5139				
	B Class	24.235	28.002	3766	97138	22.9	5.7	28.6
	Total	44.320	53.225	8906				
JCS	B1	48.773	63.339	14566	182080	36.4	9.1	45.5
	B2	22.715	25.204	2489	92096	23.0	5.8	28.8

	B8	9.336	10.064	728	47301	11.8	3.0	14.8
	Other	104.515	124.020	19505				
	B Class	80.824	98.607	17783	321477	71.3	17.8	89.1
	Total	185.339	222.627	37288				

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Average Policy-On Scenario

LA Area		2011	2031	2011-2031	Floorspace (sqm)	Land Req (ha)	Safety margin (ha)	Total land req (ha)
Cheltenham	B1	20.452	30.757	10305	128812	25.8	6.4	32.2
	B2	6.507	9.568	3061	113262	28.3	7.1	35.4
	B8	2.744	2.995	251	16334	4.1	1.0	5.1
	Other	42.157	49.599	7442				
	B Class	29.703	43.320	13617	258408	58.2	14.5	72.7
	Total	71.860	92.919	21059				
Gloucester	B1	17.160	19.990	2830	35379	7.1	1.8	8.8
	B2	6.000	8.322	2321	85889	21.5	5.4	26.8
	B8	3.726	4.179	454	29491	7.4	1.8	9.2
	Other	42.274	51.680	9406				
	B Class	26.886	32.491	5605	150759	35.9	9.0	44.9
	Total	69.160	84.171	15011				
Tewkesbury	B1	11.161	13.701	2540	31750	6.3	1.6	7.9
	B2	10.208	12.503	2295	84924	21.2	5.3	26.5
	B8	2.867	3.330	463	30072	7.5	1.9	9.4
	Other	20.084	25.329	5245				
	B Class	24.235	29.533	5298	146746	35.1	8.8	43.9
	Total	44.320	54.863	10543				
JCS	B1	48.773	64.448	15675	195941	39.2	9.8	49.0
	B2	22.715	30.392	7678	284075	71.0	17.8	88.8

	B8	9.336	10.504	1168	75897	19.0	4.7	23.7
	Other	104.515	126.609	22093				
	B Class	80.824	105.344	24521	555914	129.2	32.3	161.5
	Total	185.339	231.953	46614				

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