



9 April 2018

Planning Policy Team
Cheltenham Borough Council
Municipal Offices Promenade
Cheltenham
Gloucestershire
GL50 9SA

Dear Sir

Cheltenham Plan - Pre-Submission consultation (Regulation 19)

We write in response to the public consultation of the Cheltenham Plan Pre-Submission Consultation. We have already sent you a response on the 12 February 2018 that raises our primary concerns and the issues raised in that response are not repeated here.

In summary the C&I Group of the LEP do not believe that the Local Plan has provided sufficient employment land within the Local Plan to support the Boroughs needs within the Plan Period. Whilst it is accepted that the Borough will provide two of the largest employment areas within the JCS area (West Cheltenham 45ha and North West Cheltenham 10ha), this needs to be looked at against the backdrop of the entire JCS are where it is proposed to provide **a minimum of** 192ha of new employment land up to 2031.

The new strategic employment sites will take some time to be developed and delivered and therefore it is considered that a pipeline of smaller, more deliverable sites needs to complement the strategic sites in order to ensure that there is a meaningful supply and choice of employment sites within the JCS area. It is quite apparent that new office development is needed **now** as there is currently no choice in the market place and an acute shortage. This has only led to a sharp increase in price per square foot for existing office space and making office accommodation unaffordable for many businesses within the town. Equally, there is also an acute shortage of other B Class land and this also needs to be rectified.

We are aware of many businesses that have left the town as they have been unable to secure suitable premises.

The adopted JCS advocates that the strategic allocations will provide a total of 112.2ha of new employment land. However, this should be discounted to 98.8ha as North West Cheltenham will only be providing 10ha. This leaves a residual of 93.2ha of new employment land to be found through the local plans.

The JCS expressed all figures as a minimum, as during the round table sessions it was agreed that if more new employment land could be found this would be welcomed because all existing supply had been exhausted and there had been considerable losses to other uses especially in Cheltenham where there has been a considerable loss of office buildings to residential through permitted development rights and there has been no new employment sites coming forward. It is quite apparent that the pressure for new housing has led to the loss of many key employment sites and buildings exacerbating the shortage of employment land in the Borough as a whole. The Cheltenham Plan should therefore seek to positively address this problem to ensure that the town has a robust economy over the entire Plan period.

The Cheltenham Plan advocates four new employment sites through Policy EM3. The combined area of these sites provides 8.28ha of employment land which is considered to be insufficient against an outstanding requirement of 93.2ha.

In addition, three of the sites that have been identified and allocated are all pre-existing employment sites (existed as an employment site before 2011) and accordingly should not be utilised to make up a supply of new sites for the Borough. These sites should be safeguarded under Policy EM1 of the Plan as 'Key Existing Employment Land and Buildings'.

Land south of Jessop Avenue was a former employment site and is currently being redeveloped to provide a new office block. Land South of Hatherley Lane is also currently in employment use and part of a larger employment redevelopment proposal. Land North-West of Grovefield Way already benefits from a planning consent for employment use. Part of the site is now occupied by a car showroom (sui-generis use) leaving only 4.15ha in office use. Cheltenham Walk is currently being used as a car park.

The C&I Group of the LEP recommend that the Council allocate new employment land on suitable and accessible sites within the Borough or adjoining its immediate boundary in order to address the shortage of employment land and premises in the Borough and to assist in the overall supply of employment land set out in the JCS. It is accepted that such allocations may comprise of new greenfield allocations adjoining the main artery routes into the town. Such sites should be approximately 0.5-2ha and deliverable through the planning process and within the first part of the Plan period.

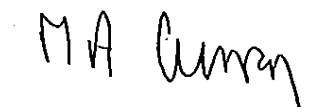
The JCS Inspector provided a broad indication of acceptable locations against the landscape constraints in the area and these should be re-investigated in order to assist in the provision of a meaningful supply of new employment sites to support the Borough.

The C&I Group of the LEP also recommend that the Council take a more practical and flexible approach to the development of new business parks recognising that it is commonplace for new business developments to provide complimentary and ancillary uses on site. Ancillary uses can comprise of hotels, cafes, pubs, restaurants, retail uses to name a few. The addition of these ancillary facilities and uses maintains the attractiveness of the park for end users and improves the viability and delivery of the B class employment. Such uses are also recognised as providing a significantly higher number of jobs than the equivalent floor area or site area of B class uses as well as providing much needed amenity.

It is considered that the Plan should make reference to ancillary uses being acceptable on employment parks provided they do not exceed 20% of the intended employment content.

We hope you find this information of assistance but please do not hesitate to contact me should you have any questions.

Yours faithfully



Mike Curran
Strategic Business Manager
GFirst LEP

Phone: +44 (0) 1242 715 486

Mobile: +44 (0) 7850 182 141

www.gfirstlep.com info@gfirstlep.com 01242 715480

Registered Office: GFirst LEP CIC, Oxstalls Campus, Gloucester, GL2 9HW

Company Number 09353067