

## Response to Inspector's Issues (ED009)

Representor Id: 215

Comment Id: 1338

### M2 - Employment

#### Q2 *Are Policies EM1 and EM2 in accordance with NPPF paragraph 22?*

Para. 22 advises: "... avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose."

Eventually, this advice could be applied to the huge 45ha of Employment land JCS-allocated in the West Cheltenham UE, for which the delivery of business-grade Transport infrastructure is far from assured, but where the 1100 houses component could readily be increased.

The GFirst-LEP (who declined the JCS Inspector's requests to appear at the JCS Examination sessions) and the consultants Nathaniel Lichfield nevertheless achieved a 'high water mark' figure for Employment hectares, occupying much of the West Cheltenham UE; if these "aspirations" for attracting growth into Gloucestershire do not materialise (and every District's plan seems to make that competitive claim but all cannot be successful) then some of that West Cheltenham land should soon become a fall-back for further Housing.

#### Q5 *Should any further provision be made for economic development which falls outside B-class uses?*

Employment land allocation is already over-aspirational at Cheltenham.

Certainly no more Employment land is justified for Retail use, because that would pre-empt and prejudice the already delayed "immediate" Retail Review ordered by the JCS Examination, which is most urgently needed for Cheltenham's distinctive '**retail hierarchy**' of planned shopping centres (a non-common feature which the other two Districts do not share, and which therefore ought to be taken into the CLP).