

GFirst LEP Construction & Infrastructure Business Group Response 5th February 2019

The Cheltenham Plan

Proposed Statement of Common Ground 11 Jan 2019

Introduction

This statement has been prepared between Cheltenham Borough Council and GFirst LEP's Construction and Infrastructure Business Group with regard to the employment strategy of the emerging Cheltenham Plan and identifies the areas of agreement and disagreement between the parties relating to the employment strategy of the Plan.

Background

Policy SP1 of the JCS recognises that provision needs to be made for a *minimum* of 192 ha of B Class employment land to support around 39,500 new jobs between 2011 and 2031 across three neighbouring authorities. This agreed amount of new employment land will help to provide choice and a degree of flexibility to the market during the Plan period. JCS strategic allocations through urban extensions at West Cheltenham and North-West Cheltenham make significant contributions to overall provision both in terms of housing and employment land. West Cheltenham is planned to provide 45ha of new B Class employment land and North-West Cheltenham will provide 10 ha of new employment land.

The GFirst LEP C & I Business Group has made representations to the Cheltenham Plan during the preparation process. This follows on from the cooperative work which took place between the JCS authorities and the LEP during the preparations of the JCS.

An area of contention between CBC and LEP has remained and was the subject of a letter sent by the LEP to the Inspector on 30th November 2018. This reflects a concern that the JCS delivers 84 hectares of a total agreed employment requirement of 192 hectares, with the shortfall to be made up through local plans. In summary "The LEP remains concerned that no *new* employment land is being supplied in the (Cheltenham) Plan and consider that a clear and coherent strategy is required to deliver the employment needs of the town as well as for the wider JCS area." It is undisputed that new employment sites to meet the needs of Cheltenham Borough Council to retain its position as an economic centre within Gloucestershire are required.

Dialogue

Following further meetings between the two parties, CBC and the C&I group, and a detailed analysis of key evidence documents, critically the current (2018/19) SALA (Strategic Assessment of Land Availability) with its consideration of around 140 sites, the Athey Consulting Report [ACR] (January 2015) produced in evidence for the emerging Plan, the Nathaniel Lichfield and Partners [NLP] Employment Land Assessment Update (October 2015), it was considered that there are opportunities to look at additional sites to provide new employment land within the Borough even though there are particular challenges within the Borough boundary.

The Way Forward

All parties agreed that:

1. It is important that there is a pipeline of deliverable new employment sites in Cheltenham, in addition to the strategic (JCS) allocations, within the Borough. This will provide a variety and choice of new sites for both indigenous growth and inward investment.
2. That a holistic approach is taken between the 3 JCS authorities to ensure that the minimum of 192ha is provided across the boroughs to support the identified employment needs in the JCS.
3. It is agreed that there are currently 84ha of new employment land across the JCS identified as strategic allocations with a residual of 108ha to be found during this plan period, within local plans or the JCS review.
4. The Athey Consulting report identifies a structural gap in the employment strategy of the Local Plan and requires a selection of new Business Park sites to come forward quickly. The report suggests that there is a need for smaller deliverable business parks to complement the existing JCS strategic allocations.
5. There is a need to protect existing viable employment sites within the plan.
6. It is important that new sites are identified in the Cheltenham Plan, but it is recognised that Cheltenham Borough has a tight administrative boundary.
7. Both parties agree that it is important to re-assess existing and allocated employment sites when market circumstances have changed.
8. It is agreed that ancillary uses on employment sites may be appropriate where these remain subservient to the primary employment use.
9. All parties will continue working to help deliver an appropriate and agreeable employment strategy for the town.

The parties do not agree on the following matters:

1. The GFirst LEP C & I Business Group consider that there is a need to provide more employment land in Cheltenham now to protect the economy of the town, over and above the current allocations made in policy EM3;
2. The GFirst LEP C & I Business Group considers that in order to support the economy of the town and address the identified structural gap in the current employment strategy, there is a need to provide a pipeline of deliverable modern employment sites within the town;
3. The GFirst LEP C & I Business Group believe that there are suitable and deliverable sites that are available to deliver this pipeline of smaller sites. Some of these sites are on the edge of the settlement boundary and within the Green Belt, but suitable for

modern business purposes. It is considered that these sites should be brought forward now to ensure that there are suitable sites for business users.

4. The GFirst LEP C & I Business Group believe that on the basis of the evidence presented, there is a need to identify further sites now (within the emerging Cheltenham Plan) and also to develop policy to promote these sites.
5. The GFirst LEP C & I Business Group would like to amend wording of EM3 to include these new employment sites that will help provide a range and choice of new sites within the town.
6. The Council do not agree with the principle that incursions into the Green Belt are required, however, all applications will be judged on their individual merits.
7. The Council believe that the Cheltenham Plan is informed by a robust and transparent site identification methodology and that no additional employment land is needed now and any shortfall in the JCS requirement can be assessed through the JCS review.
8. The Council consider that Cheltenham may require cross boundary support for employment sites and that there is a need to utilise the JCS Review as a means of identifying further employment sites.
9. Consequently the Council do not consider an amendment to Policy EM3 is necessary.