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Cheltenham Local Plan Inquiry

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Dear Tracey

**Employment Land Supply Evidence**

During the employment session of the Local Plan, the Inspector requested further evidence regarding the *status* of the proposed new employment sites within Policy EM3 of the Local Plan.

There remained an outstanding concern whether the proposed “new employment allocations” as set out in Policy EM3 constituted new employment land or were in fact commitments that had already been accounted for within the employment land supply calculations?

**Background**

Firstly, it is apparent that the basis for the JCS employment calculations were made from the “Economic Update Note, February 2016 (EUN) [attached].

At that time, the EUN envisaged that there was a *potential* employment land supply in the JCS area that amounted to 238ha. This supply was made up from:

- |  |              |
|--|--------------|
| 1. Strategic allocations:              | 127ha        |
| 2. Existing undeveloped capacity:      | 63ha         |
| 3. Other available and suitable sites: | <u>48ha</u>  |
| <b>Total:</b>                          | <b>238ha</b> |

*(Summary of Table 1 of the EUN)*

Since the EUN was issued the employment land supply position has changed significantly and is summarised below.

**JCS Strategic Allocations:**

The new strategic employment allocations as of today, are made up as follows:

	<b>Strategic Allocation</b>	<b>B-Class employment land - hectares</b>
1	Innsworth and Twigworth	9
2	South Churchdown	17
3	North Brockworth	3
4	North West Cheltenham	10
5	Ashchurch Strategic allocation	0
6	West Cheltenham	45
	<b>Total</b>	<b>84</b>

Strategic allocations therefore make up 84ha of the minimum requirement of 192ha. The remaining allocation of **108ha** is to be provided through the District Plans.

The table above differs from that set out at Table SA1 of the JCS because the nature and deliverability of the employment allocations changed, altering the supply assessed by the EUN. However, the JCS was not able to fully reflect this in the final text which still shows employment allocations at Ashchurch and a greater B Class employment provision at North West Cheltenham.

Some of the primary differences between the current situation and the EUN assessment of 2016 is:

- The loss of the MOD Ashchurch allocation of 20ha;
- The reduction of the NW Cheltenham Allocation by 13ha (provides only 10ha of B Class Employment);
- The loss of 14.2ha of the Ashchurch Allocation (A9) to retail; and
- The increase of the West Cheltenham Allocation to 45ha from 40ha.

The Strategic allocations in the JCS are therefore only expected to deliver 84ha of new employment land during the plan period as opposed to the anticipated 127ha in the EUN or the 112.2ha set out in Table SA1 of the JCS. The residual provision to meet the minimum requirement will therefore need to be made through allocations in the District Plans.

The EUN anticipated that the proposed SALA sites would deliver 48ha of new employment land during the plan period, which would materialise through the emerging District Plans. These sites were not rigorously assessed but were deemed to have the potential for employment use. The assessment of these sites was to be made through the District Plans.

It is apparent that Tewkesbury Borough Council is expected to provide the largest number of new employment sites, as geographically the Borough has a larger area of land within its administrative boundary and also preside over the hinterland of both Gloucester and Cheltenham.

Tewkesbury Borough Council has recently released the Preferred Options of their Local Plan for consultation and within this there is an additional 45ha of new employment land in the form of extensions to existing business parks within the Borough. Whilst the Council has rigorously assessed these sites for their suitability to provide for the employment needs of the Borough and JCS area over the Plan period, they have not been fully tested through consultation or examination. The sites are however supported by a comprehensive analysis provided in their 'Employment Land Background Paper, September 2018'. It is therefore anticipated that these sites are likely to come forward through the evolution of their plan.

The remaining capacity was anticipated to come through the residual land available on existing allocations. All of these allocations are within Tewkesbury Borough and the supply was anticipated to be delivered as follows:

LPA	Policy Ref	Site Name	Available Area	0-5 years	6-10 years	11-15 years
TBC	BI3	Malvern View	2.5	2.5		
TBC	BI4	Cleeve Business Park	5.7		5.7	
TBC	BR2	Gloucester Business Park	20	5	7.5	7.5
TBC	EMP1	Bishops Cleeve/Southam	7.2		3	4
TBC	EMP1	Staverton/Churchdown	4.5	4.4		
<b>Totals</b>			<b>39.9</b>	12	16.2	11.5

An assessment of this supply was provided by Hunter Page Planning (now Ridge) to the JCS Examination. This assessment was undertaken in conjunction with Alder King who provided a marketing opinion on the existing sites available for development. Overall this showed that only 3.4ha were available in Tewkesbury with 7ha being available in Gloucester City, making a total of 10.4ha remaining on existing allocations, in contrast to the potential 39.9ha illustrated in the EUN (Appendix 2, B).

With regard to extant consents the supply position was purported as being 32.291ha. The actual supply available from this source is detailed below:

	Site	Area	Comment	Gain in Employment Land
1	Council Depot, Gravel Pit Lane, Prestbury	0.38	Existing vehicle and machinery depot to be redeveloped into 10 light industrial units. Overall not a new B Class use as the site was already in B8 use.	0
2	Unit C, Staverton Connection	0.16	Creation of a new industrial building on a former Paddock for Injection Mouldings Ltd. Creation of new employment space.	0.16
3	Pennant Court, Staverton Tech Park	0.38	Extension to an existing industrial building in an existing industrial park. Not the creation of new employment land.	0
4	Cotteswold Dairy, Northway	1.69	Erection of single storey canopy to tanker bay area. Re-location of 2 no. silos and installation of 5 no. new silo tanks. This application does not involve the creation of new employment land.	0
5	CSD Business Park, Northway	0.21	Site is already in employment use on an established employment park. Therefore there is no new employment land being created.	0
6	G&R Pollard Engineering, Ashchurch	0.2	Proposal is for a two-storey side extension for G7R Pollard Engineering Limited, to be provided on their existing industrial site. The proposal does not therefore create new employment land.	0
7	Ashville Business Park	2.4	Proposal for Spectrum Medical Limited for new office and R&D accommodation on a greenfield site.	2.4
8	Home Farm, Brockhampton	0.14	Use of the parking area of an indoor riding centre to be used to store caravans (amendment to condition). Not new employment use.	0
9	Messier Services, Meteor Business Park	0.05	The proposal comprises a 2 storey extension to the west elevation of Hangar 4 which would be flanked	0

			either side by single storey lean-to extensions. Not new B Class employment.	
10	DAD Ashchurch	0.5	Extension to an existing warehouse for Domestic Appliance Distribution. Developed on existing car park and not the creation of new employment land.	0
11	GE Aviation, Bishops Cleeve	0.12	Outline application for the temporary stationing of a modular portakabin office building (B1 use) for a period of two years. Not new employment creation.	0
12	Staverton Court, Staverton	0.34	Two storey office extension for Hazelwoods. Not the creation of new employment land.	0
13	Berkeley Court, High Street	0.096	Unit was previously in office use and then changed to D1. The application was to convert the unit back to office use. Therefore not the creation of new employment land.	0
14	GCHQ Benhall, Hubble Road	3.21	Creation of two new office buildings on the GCHQ complex. Development has not been started due to parking restrictions. The application was permitted in March 2010 but has not been renewed or implemented and has therefore expired.	0
15	Cheltenham Film Studios	0.335	This is an application to extend the time limit for the extension to Cheltenham Film studios. This application does not provide the creation of new employment land.	0
16	Reset Health and Fitness, Unit 1 St Georges Place Car Park, St Georges Place	0.13	Change of use of existing building and not the creation of new employment land. Was formerly an office building.	0
17	Triangle Park	1.94	Creation of new business units as part of a mixed use development from the former railway triangle. Part of the development is anchored by a new Morrisons supermarket.	1.94
18	Kingsway Framework	13.42	Redevelopment of the former RAF	0

			Quedgeley for employment uses. Site was however, formerly utilised for B1 and B8 purposes and therefore does not constitute new employment creation.	
19	Gloucester Quays	0.89	Development comprises of residential and retail and not employment.	0
20	Land North of Walls	5.7	Creation of new site for B1, B2, B8 and car showroom.	5.7
		<b>32.291</b>		<b>10.2</b>

The EUN was however only ever intended to provide a summary of the employment sources, with more comprehensive assessments being made through the Council’s own monitoring reports. However, following the EUN, the current Employment Land Supply from the JCS Authorities can be summarised as follows:

- o Strategic Allocations: 84ha
  - o Existing undeveloped capacity (based on previous allocations and extant planning permissions): 20.6ha
  - o Allocations coming forward (Tewkesbury Borough Council): 45ha
- Total: 149.6ha**

There remains 42.4ha of additional employment land to be found within the JCS area in order for the *minimum* requirement of employment land to be met. It was anticipated that the Local Plans would provide sufficient flexibility to provide a ‘pipeline’ of **new** sites to compliment the JCS strategic allocations and make up the residual allocation.

**Cheltenham’s Position**

The Cheltenham Plan purports to provide 8.28ha of ‘new employment land’, however, it is apparent that 3 of these sites have already been represented in the employment land supply calculations provided for the JCS (under the title of previous allocations and extant permissions). The main evidence base for employment land supply that Cheltenham Borough Council presented to the JCS was based on their “Non-Residential Land Use Monitoring Report, August 2014”. This shows that Hatherley Lane (E2) and Govefield Way (E3) have been identified as ‘Employment Commitments’ as of 1<sup>st</sup> April 2014 (Appendix 2 of the Report under the heading Benhall & Reddings – 2<sup>nd</sup> and 5<sup>th</sup> row of the table). The supply therefore represents a ‘double counting’ of sites misrepresenting the amount of employment land available in the Borough and indeed the residual amount of new employment land required for the future.

1. Hatherley Lane – 0.86ha: 12/01488/FUL, Former Woodward International, Hatherley Lane. Erection of 3,384m2 of office headquarters floorspace. Planning permission consented on 20/09/13 (planning permission attached)

2. Land at North Road West/Grovefield Way – 6.4ha: 10/00690/REM, Outline planning permission for B1 industrial uses and the extension to the Arle Court Park and Ride facility. Planning permission originally consented on the 29/07/2010 but subsequently modified. The site is now partially developed with a BMW garage and showroom and a proposal for a new business park on the site currently at appeal after the refusal of the development by the Council.

The Jessop Avenue site is currently under construction for a new office building that is due to be complete in Spring this year (<http://honeybourne-place.uk/>). However, this site has also appeared as an employment commitment within the Council's 'Non-Residential Land Use Monitoring Report, June 2017 (attached, page 31) and is described as a net gain to employment floorspace within Cheltenham:

- Land on the South Side of Jessop Avenue. Erection of a six storey B1 office development with A2/A3 use at ground floor together with roof plant external cycle and bin stores, on-site parking and parking canopy structures. Floor area 3,399m<sup>2</sup>, application reference 16/01417/FUL.

The planning permissions relating to this development are attached from which it can be seen that there has been a considerable history of employment development on this site that has already been accounted for within the employment land supply.

Given that all three of these sites have been classified as employment commitments by the Council, it is therefore respectfully requested that they are moved from Policy EM3 and recognised as commitments and not new employment land and that a 'pipeline of new employment sites are identified by the Borough to support the economy of the town, as had been anticipated by the JCS:

*"Policy SP2: Distribution of New Development*

9. *To support economic growth in the JCS area, the JCS will make provision for at least 192 hectares of B-class employment land. At least 84 hectares of B-Class employment land will be delivered on Strategic Allocation sites as detailed at Policy SA1. **Any further capacity will be identified in District plans.**"* (our emphasis).

and

*"Further investigation into employment allocations and capacity will be undertaken through the District plans."* (Paragraph 3.2.21).

The JCS was quite specific that Gloucester and Cheltenham, together with their immediate wider areas, *remain the primary focus for growth*. This reflects the urban-focused economic vision and support for urban regeneration for the JCS area. (paragraph 3.2.5 of the JCS).

The JCS also sets out that beyond Gloucester, Cheltenham and the strategic allocations, further development will be accommodated within Tewkesbury Borough. (paragraph 3.2.13).

Therefore, if the JCS strategy is to be adhered to, the emerging plans for Cheltenham and Gloucester should be looking to accommodate the majority of the residual employment allocations that amount to 108ha. At present, it would appear that the opposite may occur, with Tewkesbury allocating the majority of this residual amount (45ha), with Cheltenham and Gloucester not providing any further supply.

Please do not hesitate to contact me should you require any further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Fong'.

**Paul Fong MRTPI**  
Partner  
For Ridge and Partners LLP