



RIDGE

TOWN & COUNTRY PLANNING ACT 1990 SECTION 78

UPDATE STATEMENT ON EMPLOYMENT LAND SUPPLY
PAUL FONG MRTPI

APPEAL REFERENCE:APP/B1605/W/18/3200395

TOWN & COUNTRY PLANNING ACT 1990 SECTION 78

UPDATE STATEMENT

APPEAL REFERENCE:APP/B1605/W/18/3200395

23 October 2019

Prepared by

Ridge and Partners LLP
Thornbury House
18 High Street
Cheltenham
Gloucestershire
GL50 1DZ

Tel: 01242 230066

Job No. 5150

Contact

Paul Fong
Email: pfong@ridge.co.uk
Mobile: 07770 268650

Contents

- 1.0 Introduction and background
- 2.0 Tewkesbury Borough Plan
- 3.0 Cheltenham Plan
- 4.0 Conclusions

1.0 INTRODUCTION AND BACKGROUND

- 1.1. This update statement has been provided following the release of:
- a. Pre-submission Tewkesbury Borough Plan (2011-2031) Employment Land Background Paper, October 2019; and
 - b. Cheltenham Plan Main Modifications Report, 14 October 2019.
- 1.2. Both of these Plans aim to provide new employment land within the Joint Core Strategy (JCS) area and thereby providing additional employment land within the JCS area. This report looks at the contribution each plan could potentially make to that employment land supply.
- 1.3. In conjunction with Policy SP1 of the Joint Core Strategy, the three authorities have committed to provide a minimum of 192 hectares of new B-class employment land to support positive business growth aspirations and approximately 39,500 new jobs.
- 1.4. In combination with Policy SP2 (Distribution of Development), at least 84ha of B-Class employment land will be delivered on Strategic Allocations as detailed at Policy SA1 and the residual capacity will be identified in the District Plans.
- 1.5. Paragraph 3.2.20 sets out that:
- “Through the District plans each authority will explore the potential to allocate further local employment sites. This will provide a choice and flexibility to support the delivery of B-class employment growth.”*
- 1.6. In my earlier statement dated 28 August 2019, I set out at paragraph 4.9 that the strategic allocations of the JCS should provide at least 84ha of new employment land. Accordingly, there remains a shortfall of 108ha to be found through the emerging Local Plans.
- 1.7. This update note therefore assesses the progress made on the Tewkesbury Local Plan employment position and the Cheltenham Plan employment position to see whether this shortfall has been met.

2.0 TEWKESBURY BOROUGH PLAN

- 2.1 The Pre-Submission Tewkesbury Borough Plan was approved for public consultation, and subsequent submission to the Government for public examination, at a meeting of the Council on the 30th July 2019.
- 2.2 The consultation will take place for a minimum statutory 6-week period between the 4th October 2019 and 18th November 2019.
- 2.3 The Local Plan was accompanied by an Employment Land Background Paper (October 2019) that now proposes the allocation of 46.498ha of new employment land.
- 2.4 The Tewkesbury Borough Plan Employment Land Background Paper (TBPELBP) recognises that provision will be made for a minimum of 192ha of B-Class employment land in the JCS area, recognising that that Policy SP2 makes provision for at least 84ha on strategic allocation and any further capacity will be identified in District Plans.
- 2.5 In 2016 Tewkesbury Borough Council's Employment Land and Economic Development Strategy Review produced by Bruton Knowles (ELEDSR) suggested there was an existing undeveloped capacity within the Borough of approximately 40ha and potentially a further 40ha from other sites that emerged from the Council's Assessment of Land Availability. This position was however examined last year by Ridge to demonstrate that the existing undeveloped capacity, based on previous allocations and extant planning permissions, only amounted to 20.6ha (Section 3, pages 12-15 of my original proof).
- 2.6 The potential employment land supply emerging from the Council's Assessment of Land Availability (potentially 40ha) has demonstrated that there were potentially suitable sites available for new employment development. The Council has provided further analysis of this potential supply and proposes to allocate these sites in the emerging Plan and thereby making new employment allocations to compliment the JCS strategic allocations.
- 2.7 Paragraph 5.4 of the TBPELBP sets out that:
- "In the interests of planning proactively and in order to provide choice and flexibility to support the delivery of employment growth, the aim of this background paper is to explore all viable and sustainable employment site options for potential allocation in the TBP. As such it is not intended to establish a target or upper limit to the plan's employment land capacity."*
- 2.8 The TBPELBP seeks to allocate the following new employment sites:

	Site	Size (ha)
1	Brockridge Farm Business Centre, Twyning	4
2	Land adjacent to Duddage Manor Business Park, Twyning	0.53
3	Land adjacent Highnam Business Centre, Highnam	5.2
4	Land adjacent to Knightsbridge Business Centre, Coombe Hill	2.1
5	Homelands Farm, Bishops Cleeve	1.678
6	Land adjacent Malvern View Business Park, Bishops Cleeve	13.6
7	Land adjacent to Ashville Business Park, Staverton	3.51
8	Land East of Meteor Business Park	1.6
9	Land south-west of Bamfurlong Industrial Park	3.5
10	Land adjacent Orchard Industrial Estate, Toddington	6.549
11	Land adjacent Isbourne Business Centre, Greet	1.923
12	Park Farm Industrial Estate, Gretton	1.349
13	Withytrees Farm, Greet	0.959
	Total	<u>46.498</u>

2.9 Assuming that all of the proposed new employment allocations survive the scrutiny of the current public consultation as well as the examination of the Local Plan, it is considered that they will assist the JCS in providing a further 46.498ha of new employment land. However, there is insufficient

evidence to support the view that these sites are deliverable as employment allocations. This is particularly the case given that the Council have seen a number of previous employment allocations coming forward for other forms of development.

2.10 However, even assuming that this entire supply is deliverable, the conclusions at paragraph 5.4 of my Updated Hearing Statement, dated 28 August 2019 would only be updated as follows:

The employment land supply for the area can be summarised as follows:

Strategic allocations:	84ha
Existing undeveloped capacity:	20.6ha
Allocations coming forward (Tewkesbury Borough Council)	46.498ha
Total:	151.098ha

2.11 Therefore, even having regard for the Council's new proposed allocations, there continues to remain a serious shortfall in the employment land supply in the JCS area of 40.902ha.

3.0 CHELTENHAM PLAN

- 3.1 The main modifications to the Cheltenham Plan have now been produced by Cheltenham Borough Council that have responded to the Inspector's recommendations and all other matters raised in the examination of the Plan.
- 3.2 The Main Modifications were taken to committee on the 14 October 2019 and it is now intended to take the modifications to public consultation in November 2019. Following the public consultation, the main modifications will be submitted to the Local Plan Inspector for further comment.
- 3.3 Whilst the employment policies in the Plan have been significantly modified, it is apparent that no new employment sites have come forward and accordingly the objections made by the GFirst LEP have not been met.
- 3.4 It is therefore uncertain at this stage whether the employment section of the Local Plan will be found to be suitable to support the economic needs of the town moving forward to 2031.

Primary Changes to the Employment Strategy of the Local Plan

- 3.5 The employment chapter of the Local Plan is still advertised as being designed to meet the ambitious economic aspirations for growth in the JCS area (paragraph 3.1).
- 3.6 Following substantial objections to the employment strategy and policies of the Plan, former policy EM3 has now been deleted and Policy EM1 has now been expanded and retitled "Employment Land and Buildings". This new policy effectively amalgamates the existing safeguarded employment sites within the Plan with the proposed new allocations.
- 3.7 Descriptions of the proposed new employment allocations have now been added to the text of the Policy where it can be seen that sites E1, E2 and E4 are classified as brownfield sites and in most cases have had a pre-existing employment use. In the case of site E1, it is apparent that a multi-storey office building has now been completed on the site and is currently being let.
- 3.8 Equally with site E3, Grovefield Way (the appeal site), the Council have now amended the description to reflect the residual 4.1ha available on the site.
- 3.9 The Council do not identify any additional employment sites to meet the employment land supply for the JCS area.
- 3.10 Accordingly, there remains a shortfall in the employment land supply required for the Borough. The Council's own evidence, namely the Athey report, specifically highlighted a need for a pipeline of smaller business park sites in and around the Borough that would support the business needs of the town until such time as the strategic allocations were delivered.

- 3.11 Unfortunately, the main modifications of the Local Plan still do not attempt to deliver any new employment land within the Borough but instead rely heavily on existing employment land and sites to the detriment of the local economy.
- 3.12 Consequently, the main modifications that have been made to the Cheltenham Plan do not assist in reducing the shortfall in the employment land supply in the JCS area.
- 3.13 There are no other policies within the Plan that add to the employment land supply of the Borough.

4.0 CONCLUSIONS

- 4.1 Since the first inquiry into this site, the Local Plans for the area have advanced and both the Cheltenham Plan and the Tewkesbury Borough Plan purport to provide new employment sites for the JCS area.
- 4.2 With regard to Policies SP1 and SP2 of the JCS, it was anticipated that the residual employment land requirement (a minimum of 192ha of new employment land) would be met through the emerging District Plans. Therefore, the three JCS authorities still need to identify a further 108ha of new employment land.
- 4.3 The emerging Tewkesbury Borough Local Plan has sought to identify further employment land, however they are only proposing to allocate 46.498ha of new land.
- 4.4 The employment evidence and background produced for the emerging Cheltenham Plan shows a desperate need for new sites in and around the Borough. Following the examination of the Plan, it was apparent that the Local Plan Inspector retained concerns over the sites that were being proposed as new employment sites and there remains an outstanding objection from the LEP that there are insufficient new sites to serve the economic needs of the town.
- 4.5 The main modifications to the Plan have done little to rectify this situation. The Council have not produced any additional, new employment sites and continue to rely on existing employment sites to support the economic needs of the town.
- 4.6 Therefore, the employment land supply of the JCS area has moved on marginally but not significantly to support the economic needs of Cheltenham Borough.



RIDGE



www.ridge.co.uk