

24 February 2021

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Dear Inspector Reed

Tewkesbury Borough Local Plan

The GFirst LEP Construction & Infrastructure business group write to you with regard to the employment land provision within the Tewkesbury Borough Local Plan and within the Joint Core Strategy (JCS) administrative area. We note that you raised the question with regard to the latest position of employment land supply within the JCS area, with respect of the 192ha requirement.

Whilst the group fully support the work that Tewkesbury has done to provide additional employment land, we have grave concerns that once the local plans for Cheltenham, Gloucester and Tewkesbury are adopted, collectively, these with the Joint Core Strategy allocations, will not be able to provide the required employment land for the area, up to 2031. The group have already submitted representations to the Plan on the 15 November 2019.

The LEP's ambition is to drive economic growth in Gloucestershire in partnership with the business community and the public and voluntary sectors. The aim and objective of GFirst LEP is to develop a vision for growing Gloucestershire to ensure that by 2022, the county will have world class companies, a diverse business portfolio and a reputation for starting and growing great businesses. We believe that a strong economy will guarantee that we retain a prosperous and vibrant county.

The group agree with the Tewkesbury Local Plan that it is paramount to deliver a robust development plan for the area so that the Borough is capable of delivering an authoritative development strategy that provides a platform to grow the economic visions and aspirations of the local community.

It is apparent that the extant Local Plan covering Tewkesbury is now time expired and the development strategy is therefore out of date and in urgent need of renewal and replacement. A move to produce new Local Plans is welcomed but it is important that the development strategy is consistent with the county's Strategic Economic Plan (SEP) and the JCS to ensure that sufficient and suitable employment land is provided in the right place and at the right time, to allow Gloucestershire businesses to grow.

In order to provide a robust plan led system it is therefore important that a strong Local Plan is delivered with speed as it is apparent that it has been a long time in gestation and still has some way to go before adoption. In the intervening period there has been no new employment land in the Borough for a considerable period, with many office buildings and employment sites in the JCS area turning into residential sites. A clear and robust employment strategy is therefore paramount from the inception of this new Local Plan which quickly delivers the new employment sites that are so desperately needed in the area.

Compliance with the National Planning Policy Framework

In accordance with the National Planning Policy Framework, February 2019 (the Framework), the Local Plan should be prepared in accordance with the Framework (Framework 1 and 2, in accordance with paragraph 214) with the objective of being succinct and up-to-date with a positive vision for the future and addressing the housing needs and other social and environmental priorities. Local Plans should contribute to the achievement of sustainable development and therefore be consistent with the policies in the Framework including the presumption in favour of sustainable development. The Plan therefore needs to be aspirational but realistic.

In accordance with the strategic objectives of the Framework, the Tewkesbury Local Plan should have clear policies in order to deliver the homes and jobs needed in the area in conjunction with the provision of retail, leisure and other commercial development.

Fundamentally, the Framework makes it clear that the development plans for the JCS area should plan positively for the development and infrastructure required in the area over the length of the Plan period (2031).

From the outset it is important to set out that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and accordingly planning should operate to encourage and not act as an impediment to sustainable growth. The Local Plan should therefore take every step to ensure that significant weight is placed on the need to support economic growth throughout the county. The Council should proactively plan to meet the development needs of business and support a robust economy in Gloucestershire.

GFirst LEP Construction & Infrastructure business group is keen to ensure that investment in business is not over-burdened by the requirements of planning policy and it is expected that the forthcoming Local Plan should be able to address potential barriers to business investment, and ensure that there is a sufficient and deliverable supply of employment land to carry the local economy forward.

In accordance with the Framework, the group would therefore expect the Local Plan to provide the following:

- A clear economic vision for the Borough which encourages sustainable economic growth through the provision of new sites for business growth;
- Identify a range of appropriate and deliverable employment sites in accessible locations to provide a variety and choice for local businesses as well as to provide for growth and inward investment, in accordance with “Ambition 1” of the JCS:
 - *Providing the right conditions and sufficient land in appropriate locations to support existing businesses and attract new ones, particularly from the major high-tech and knowledge-based industries, tourism, retail and leisure sector, to rebalance the*

local economy away from its public sector dominance, improve the areas economic resilience, support a highly skilled workforce and continue to provide a focus for economic growth within the county.”

- Provide a range of attractive and accessible NEW employment sites that are suitable for modern businesses.
- Provide business park sites with clusters of new office buildings with ancillary uses on site to improve the vibrancy of such parks for the office users.
- And if necessary, provide a sensitive rolling back of the Green Belt to facilitate sustainable economic growth through the provision of new sites in the right locations;
- Provide positively worded and flexible planning policies to support existing business sectors and plan for emerging sectors that are likely to develop during the plan period; and
- Facilitate flexible working practices such as live/work to nurture new business growth and sustainable working practices, especially in the light of the transformational changes that we are experiencing through the recent pandemic.

Using a proportionate evidence base

In order to produce a robust planning strategy for the Local Plan, it is important that the Local Planning Authority draws upon adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the local area.

Drawing upon the expertise of the LEP’s business community is paramount in this research. The production of the economic strategy should ensure full account is taken of relevant market and economic signals. Paragraph 81 of the Framework also identifies that the economic vision of the Plan should have regard to Local Industrial Strategies and other local policies for economic growth such as the Strategic Economic Plan produced by the LEP. In this case the LEP is in a unique position of talking to businesses across the county and as a result, the LEP’s Construction & Infrastructure business group are aware of current market trends and business strategies that will be relevant to the development of new employment sites within the Borough.

This group believes it will be important to submit a plan which the Local Plan team considers to be “sound”. To achieve this, Tewkesbury and the allied authorities need to be confident that their Plan is based on strategies which seek to meet objectively assessed development and infrastructure requirements including unmet requirements from previous plan periods. The strategy of the plan should be able to stand up to scrutiny when considered against reasonably deduced alternatives.

At this present point in time, this group does not consider that the combined employment land produced by the JCS authorities is sufficient to meet the objectively assessed needs for the JCS area up to 2031 and there are no sufficiently robust mechanisms in place by which to accommodate this unmet need.

Strategic Economic Plan and emerging Local Industrial Strategy

GFirst LEP has adopted an ambitious Strategic Economic Plan (SEP) for the county in order to produce significant growth in GVA (*gross value added*). To achieve this ambition requires the county to do significantly better than it has done in previous years which the SEP will achieve by exploiting the opportunities presented by the motorway corridor and doing more to support indigenous businesses growth.

In our discussions with local businesses, we are satisfied that there will be strong local growth and that there is confidence within the business community of continued and strong growth during the Local Plan period despite the current restrictions and slow down brought about by the COVID pandemic.

The SEP will therefore aim to provide the framework to grow the local economy by creating an environment that attracts new high growth potential businesses and promotes the growth of existing businesses already located within the county. This has become increasingly more important following the COVID pandemic.

The SEP will specifically aim to ensure that sufficient employment land is available in appropriate locations within the county and with the necessary transport infrastructure demanded by businesses. Within the county there is real potential to exploit some of our strengths, for example:

- High growth potential in some key sectors;
- Our unique asset base in a high quality and well-connected location;
- Our strong knowledge base, providing opportunities for R&D and export; and
- Our resilient and high value employment base.

Some of the barriers to business growth that the Growth Plan hopes to overcome are:

- The need for a planning system that delivers efficiently and consistently for business; and
- To overcome the negative perceptions about the planning process;
- Overcoming the lack of suitable premises for high value businesses;
- Ensuring there is a sufficient supply of attractive development sites for all types of businesses; and
- Ensuring that future development strategies provide high quality employment land where businesses want to be.

There are several exciting opportunities for growth within the county including the potential for development of an M5 Growth Zone and business expansion through High Growth Potential Sectors. Investing in major initiatives along the M5 corridor in Gloucestershire will fuel significant business growth and prosperity throughout the county. The potential of the Growth Zone has included significant new strategically important employment allocations at North West Cheltenham and West Cheltenham.

Forecasts in the Growth Statement are based on the Local Economic Forecasting Model (LEFM) which predicts the state of the Gloucestershire economy in 2025. The model forecasts that there will be a steady rise in employment across the county between 2012 and 2025. This is also echoed by the businesses that we speak to. Average annual growth of 0.8% will

amount to an additional 33,800 jobs over this period. It is predicted that the highest employment growth sectors will be construction, engineering, finance and insurance, business administration, accommodation and food, and health and care.

The LEFM model has been used to act as a starting point and the Growth Statement acknowledges that the projections may be conservative in the light of the economic development activity already being coordinated. However, the document also notes that the government will aim to achieve economic growth close to the long run trend rate of 2.5% (about 0.7% per quarter). As a consequence LEFM predictions have been taken as a starting point only. They do not reflect planned interventions and further initiatives likely to arise from the Strategic Economic Plan and the Local Industrial Strategy.

It is expected that the overall aims and objectives of the LEP will need to be aligned with the JCS economic strategy as well as the Tewkesbury’s Local Plan economic vision.

Joint Core Strategy

‘Ambition 1’ of the Joint Core Strategy (JCS) seeks to provide and deliver a thriving economy. Within this it is expected that **sufficient land in appropriate locations** will be needed to support existing businesses and attract new ones and to rebalance the economy away from its public sector dominance, to provide a more resilient economy and to continue to be the focus for economic growth and development in the county.

Of importance to the distribution of new employment is Policy SP2 which sets out that:
*“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)

GFirst LEP construction and infrastructure business group supports the ambition to secure a thriving economy for Gloucestershire. We agree with the need to ensure the right conditions and sufficient land is available in appropriate locations to support existing businesses and attract new ones. However, we are mindful that the JCS currently only allocates 84ha of employment land within their strategic allocations as set out below, leaving a residual area of 108ha to be found in the Local Plans:

	Site	B-Class emp. land: Hectares
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
	Totals	84

The table above differs from that set out at Table SA1 of the JCS (page 97) because there has been a change in the circumstances relating to:

- North West Cheltenham (Policy A4) where it is now accepted that there will only be 10ha of B Class employment land.
- Ashchurch (Policy A5) has recently been granted planning consent for retail development under planning reference 13/01003/OUT and is currently being constructed as a retail outlet centre by the developer, Robert Hitchins Limited.

The JCS Economic Update Note of February 2016 (EUN) followed the round table sessions on Employment Land and provided the basis for the reshaped strategic employment land provision within the JCS area. This concluded that the total potential employment land supply could reach up to 238ha and accordingly would not limit the potential for economic growth. At that time their calculations were based on a land supply emerging from the following:

- Proposed JCS allocations at that time of 84ha (different from the table above);
- An additional employment allocation at Brockworth Strategic Allocation (SA4) of 3ha;
- The proposed inclusion of the strategic allocation at West Cheltenham to include 40ha;
- An existing undeveloped capacity within Tewkesbury, Cheltenham and Gloucester of 63ha; and
- And other potential sites suitable for employment that would amount to approximately 48ha of new employment land.

However, prior to the adoption of the JCS in December 2017, 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 (108ha) was therefore predicted 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.

It is apparent that Tewkesbury Borough Council is expected to provide the largest number of *new* employment sites amounting to approximately 45ha. 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		
Totals			39.9	12	16.2	11.5

An updated assessment of these sites (February 2021) revealed that the supply is now as follows:

1. Malvern View: 2.43ha
 2. Cleeve Business Park: 1.5ha (not available)
 3. Gloucester Business Park: 8.34ha
 4. Bishops Cleeve/Southam: 0.73ha
 5. Staverton/Churchdown: 0ha
- Total: 11.5ha**

Therefore, an updated supply position on existing sites showed that there was only 11.5ha available in Tewkesbury 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 either side by single storey lean-to extensions. Not new B Class employment.	0
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 Quedgeley for employment uses. Site was however, formerly utilised for B1 and B8 purposes and therefore does not constitute new employment creation.	0
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
		32.291		10.2

The current Employment Land Supply from the JCS Authorities can therefore be summarised as follows:

• Strategic Allocations:	84ha
• Existing undeveloped capacity (based on previous allocations and extant planning permissions 11.5ha +10.2ha):	21.7ha
• Allocations coming forward (Tewkesbury Borough Council):	45ha
Total:	150.7ha

There remains 41.3ha of additional employment land to be found within the JCS area in order for the *minimum* requirement of employment land to be met.

Tewkesbury has already provided a large amount of new employment land (approximately 45ha). Gloucester has no capacity for new sites and the Cheltenham Local Plan has provided no new sites.

Historically the county has benefitted significantly from having large, well located employment sites (such as Gloucester Business Park) and there have been many examples of new inward investment as a result of such sites being available. The supply of strategic sites has diminished significantly over recent years to the point where at the key locations within the county, few (if any) opportunities currently exist. The remaining supply of employment land within the JCS area is at an all-time low, with many existing local businesses having no alternative locations to accommodate their expansion requirements. This has been coupled with the loss of older employment land being redeveloped into more valuable uses without any replacement provision being made.

Overall, the remaining employment land in the county is nearly exhausted and there remains a critical and urgent need to provide new employment land for the JCS area to cater for indigenous expansion, inward investment and the loss of existing employment stock.

In addition, further work needs to be undertaken in order to provide for the numerical supply of new employment sites prescribed by the JCS. In light of the above, a deficit of 41ha within the JCS area is a significant amount, within an area that has historically been under provided for.

The group also have grave concerns that this deficit will not be addressed in the current plan period and thereby leaving the economic hub of the county under-provided for, up to 2031. Whilst we recognise that the JCS was meant to go to an immediate review following adoption, it is now 3 years later and there has been little progress towards producing a revised plan to address the shortfalls in the area. This is a matter that was raised by Inspector McDonald, in her appeal decision dated 12 January 2021 (APP/G1630/W/20/3256319) relating to a housing development in Gotherington.

In order to provide clarity and transparency over the supply of employment land, there needs to be collaboration between the three authorities to ensure **that the residual employment land, and other requirements are met** over the plan period.

We trust these comments have been of assistance but please do not hesitate to contact us should you need any further information.

Yours faithfully

GFirst Local Enterprise Partnership's Construction & Infrastructure Business Group.

