

Matter 5: Employment land and policies, including Gloucestershire Airport

Response on behalf of

Longmead Projects Ltd.

MATTER 5

Introduction

1. Harris Lamb Property Consultancy (HLPC) are instructed by Longmead Projects Ltd. (LP) to prepare a response to the Inspector's issues and questions in relation to Matter 5. LP are promoting 12 hectares of land at Twittocks Farm, Twyning for employment development and wish for the land to be considered as an employment allocation in the Plan if there is either a shortfall in provision against the Council's overall requirements or a need for alternative or additional sites should any of the Council's preferred allocations be deemed unsuitable or undeliverable.
 2. We note that in our representations to the Pre-Submission Draft Local Plan we stated that part of the overall site that is being promoted was subject to a specific requirement from a local employer who was looking to relocate. This interest has now fallen away. Notwithstanding this, the site is still considered suitable for employment use to help meet the overall employment needs of the Borough over the Plan Period. Our comments to Matter 5 should be read in this context. We set out our detailed responses to the Inspector's questions below.
- 5.3 *Taking account of the latest position in Gloucester City and Cheltenham, the JCS review, and the subsidiary role of the TBP to allocate non-strategic sites, does the plan provide sufficient employment land to meet the requirement of the JCS for at least 192 ha of B Class employment land during the plan period, 108 ha of this outside the strategic allocations? How are the elements of this provision made up, is there a remaining shortfall and, if so, is this a matter for the TBP?***
3. The Employment Land Background Paper (October 2019) (**EB003**) sets out at Appendix D those sites that it considers available and which form part of the overall supply of employment land. This includes sites that are either existing allocations, have an existing planning permission yet remain undeveloped or are new sites that are proposed for allocation. The Table in Appendix D states that these sites total 95.495 hectares which is less than the 108 hectares that the Tewkesbury Borough Plan (TBP) is expected to accommodate through the identification of sufficient land to meet its employment land requirements against the JCS requirement. There is, therefore, a shortfall of 12.5 hectares.
 4. The shortfall identified above is accentuated when the land at Malvern View Business Park, which extends to 13.6 hectares, is removed from the supply. As the Inspector infers in his question 5.7 this site now has planning permission for residential development for up to 215 dwellings following a successful appeal determined in November 2019 (APP/G1630/W/19/3229581). In light of the appeal decision, it is debatable whether this land is actually available to accommodate future employment development on the site or whether in

reality the site will be developed for housing. If it is developed for housing then the shortfall against the 108 hectare requirement increases from 12.5 hectares to 26.17 hectares.

5. In our view, there is a shortfall in the proposed supply of employment land and it is not clear how or where this is going to be addressed. Clearly, if there is a need to identify additional land then in our view the TBP should be the vehicle by which any shortfall should be addressed and we note the availability of LP's land at Twittocks Farm as being of suitable size and scale that would make a significant contribution to meeting this shortfall if needed.

5.4 *Is the methodology used for identifying employment sites in the TBP, as described in the Employment Land Background Paper (ELBP), appropriate?*

6. The methodology used for identifying employment sites in the TBP as described in the ELBP is sufficient in that it identifies any constraints, both physical and policy, and makes an assessment of a site's suitability based on these. In our view this would be the obvious first step in assessing a range of employment sites that were before the Council as it would provide an easy way to sift out sites that were clearly unsuitable if there was a physical, technical or environmental reasons that would prevent their development. Furthermore, the methodology employed would enable the Council to determine whether there was a policy objection that would prevent the development of a certain site. As such, we have no objection with the assessment methodology as far it goes.

7. However, what the assessment of sites does not do and which we think it falls down on is that no assessment or judgement is made as to how suitable sites would be from an occupier or market perspective. Paragraph 31 of the Framework advises that *"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals"*. Clearly, for an employment site to be developed there has to be demand for that type of accommodation in that location. The methodology and assessment of sites does not adequately address this market demand aspect which in our view is critical to the delivery of new employment land. As such, the methodology is appropriate in that it provides a starting point to sift out inappropriate sites for development, but it then fails to go to the next stage to make a more market driven assessment as to the suitability of certain sites over others where it is considered that there will be a market for the type of accommodation that could be developed on each of the sites. Involving local agents and seeking the views of occupiers or existing employers in the area would in our view help plug this hole in the evidence base and provide a more robust assessment as to what sites are needed and where.

5.6 *According to ELBP Appendix D these sites include 49 ha of existing undeveloped capacity (allocations and unimplemented planning permissions). Are these sites still suitable and deliverable for employment use over the plan period?*

8. LP have not examined each of the sites in detail to arrive at a conclusion that one or more of them are unlikely to come forward as expected and contribute to the supply of employment land going forward. One would expect that the Council have carried out this exercise and are confident that each will come forward as expected. If not, guidance in paragraph 120 of the

Framework advises that *“Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability”*. Clearly, if it does become apparent that one or more of the sites that are currently allocated and identified for development will not come forward, then we would expect that these should be removed from the Plan and replaced with an alternative site. The need to do so is reinforced by the fact that LP contend that there is currently a shortfall in provision against the Council’s requirements i.e. 26.17 hectares and that if any of the identified sites do not deliver as expected the shortfall will become even greater and could undermine the Council’s economic growth and job creation aspirations as a result.

5.7 In several cases, extensions to the sites are proposed in the TBP on adjacent land, not previously allocated. According to ELBP Appendix D, outside the Green Belt, these total 38 ha of new land. In each case:

- **What is the current use of the site and is there any relevant planning history? Are there any current planning applications or appeals?**
- **Is the new employment allocation justified given the site selection criteria, constraints, infrastructure requirements and potential impacts? Is there evidence the site is deliverable during the plan period?**

9. LP note that the Council identify the growth potential that the M5 motorway can provide in looking to deliver economic development within the Borough in Chapter 4 of the Pre-Submission Draft of the Local Plan. Clearly, the proximity of potential employment sites to the major trunk road network is seen as a significant opportunity when looking to identify new sites for development to meet the Borough’s future employment needs.
10. Notwithstanding this objective of looking to maximise the benefit of the M5, the table on page 55 of the Pre-Submission Draft Local Plan only identifies additional allocations at four of the Major Employment Sites, one of which is the Malvern View Business Park that now has outline planning permission for 215 dwellings, leaving only 2.24 hectares of land available for employment development. The additional allocations, which are in effect extensions to existing facilities, total only 11.64 hectares. LP do not agree that sufficient land is being made available at the larger employment sites that would be capable of accommodating more strategic district and/or regional scale development proposals.
11. In addition, a number of new allocations are proposed as extensions to the rural business park sites. Whilst we do not necessarily object to this approach, the provision of these types of sites will go to meet more specific local needs. Furthermore, occupiers that do not need good access to the strategic road network would find sites such as this attractive. However, a large part of the land that is to be allocated for employment development is intended to meet this more localised need. The Plan does not, therefore, cater sufficiently for occupiers that are looking for convenient access on to the motorway network, which is required by larger scale warehouse and distribution operators.
12. LP have submitted details of the land that it is promoting at Twittocks Farm, Twyning for consideration as a potential employment allocation. The site is located close to Junction 1 of the M50 and as such, is very well related to the motorway network and easily accessible to operators wanting to head towards Wales and the south west as well as heading north to the Midlands and the north west. There is an existing roundabout junction at the entrance to

Twittocks Farm that any new development on the site could be served from. The site is not dependent on substantial new road infrastructure having to be implemented in order to serve new development, whilst Junction 1 of the M50 already provides an all movement junction (unlike junction 10 of the M5).

13. Furthermore, the size of the site that is available would be sufficient to nearly address the loss of the Malvern View Business Park extension to residential development, thereby offering a one for one substitution. The Council have already identified two other employment sites in Twyning so it is clearly a location that is attractive to businesses and employers so we consider that there is market demand for the location, particularly when you add in the added benefit of good motorway access.
14. LP, therefore, conclude that whilst a number of the sites that are included in the Plan may well be suitable to meet more localised needs, the Plan does not adequately cater for those occupiers and operators that require good access to the motorway network, by virtue of the fact that only limited additional provision is being made at the existing Major Employment Sites and that the Council is not providing sufficient land in the first place to meet its own needs over the Plan Period. Clearly, if the Inspector is minded to ask the Council to look again other possible sites that could make up the shortfall and to address this deficiency of the Plan, LP contend that the land at Twittocks Farm should be considered as a possible site to accommodate some of these needs.