

North Somerset Council

Hearing Statement April 2017

Reference CS/10

Matter 3 – Employment

3.1 Does the SAP provide for the distribution and delivery of employment land as required in CS Policy CS20?

3.2 Are Policies SA4, SA5 and SA6 in accordance with Government policy and the CS?

i Are there any employment sites within Schedules 2 or 3 which should be excluded or amended in order to make the plan sound?

ii In Policy SA6, what does the term “economic use” cover?

iii Would the policies allow for an extension to an existing employment site such as Stowell Concrete at Yatton?

iv Should more employment land be allocated at Nailsea in order to secure employment led development?

Matter 3.1

1. Policy CS20 seeks to provide ‘at least 10,100 additional employment opportunities 2006-2026 including around 114 hectares of land for B1, B2 and B8 uses and to address the existing imbalance at Weston –super-Mare’. The approach reflects the Core Strategy settlement hierarchy with the focus for growth at Weston-super-Mare primarily through town centre and gateway regeneration and employment-led development at the Weston Villages. At the three towns, new employment development will be supported primarily on allocated land with key objectives of providing local business opportunities, improving self-containment and reducing out-commuting. Elsewhere economic activity appropriate to the scale of the settlement within settlement boundaries where this leads to greater self-containment, is compatible with the character of the area and meets locally identified needs.
2. The indicative distribution of employment land is set out in the table on page 85 of the Core Strategy:

Indicative employment land allocations (hectares)

| | |
|----------------------------|-------|
| Weston urban area | 43.82 |
| Weston Villages – at least | 37.70 |

| | |
|-------------------------------------|--------------|
| <i>Clevedon (West of Kenn Road)</i> | 8.95 |
| <i>Nailsea</i> | 1.40 |
| <i>Portishead</i> | 3.17 |
| <i>Remainder of district</i> | <u>18.87</u> |
| <i>Total (at least)</i> | 113.91 |

3. Paragraph 3.258 states that the areas (except Weston Villages) are based on the remaining Replacement Local Plan allocations 'that are envisaged to be rolled forward subject to a review process'. This review has taken place through the Employment Allocation Review (SD/11).
4. In summary the Employment Allocations Review, assessed the remaining sites allocated for business use in the Replacement Local Plan (2007) considering each site across the following factors:
 - Proximity to urban areas,
 - Site visibility,
 - Market attractiveness,
 - Strategic Access
 - Proximity to train station and/or bus connections,
 - Development and environmental constraints,
 - Compatibility with adjoining land uses.

5. A scoring system was used to indicate the site's suitability for business use, and recommendations were made for either rolling forward a site, revising the allocation, or discounting the site for further allocation. The study confirms that there are sufficient sites to facilitate the distribution and delivery of employment as required by the Core Strategy.

Employment growth in the first half of the plan period

6. Between 2006 and 2016 around 76.5ha of B Class employment land has been completed. This would include completions on some of the allocated sites that are part of the figures in the above table.
7. It is estimated that employment growth in North Somerset between 2006 and 2016 has been around 500 jobs per year. Part of this growth will be linked to the delivery of the employment land previously referred to; a proportion will also be linked to non B Class employment.
8. The plan is therefore considered to provide for the distribution of employment as set out at a strategic level, in the Core Strategy. The sites allocated are considered to be suitable and are considered to have a reasonable prospect of being delivered over the plan period. The delivery of employment land in the first half of the plan period indicates potential to achieve the Core Strategy Policy CS20 employment target and the improved economic conditions now

present may in fact increase prospects for growth. Risks to delivery include further economic downturn and insufficient land available to support business development.

3.2 Are Policies SA4, SA5 and SA6 in accordance with Government policy and the CS?

- 9 National Planning Policy Framework (NPPF) advises that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21st century' (paragraph 20).
- 10 The Core Strategy similarly has a central policy focus on encouraging economic development, a productive economy, and more locally, support the delivery of an employment-led strategy, and provision of employment to meet the needs of the labour force (see for example para 2.3, Priority Objective number 3, and Policy CS20). The Core Strategy provides a context for the allocation of business sites in Policy CS20, subject to a review process to consider the stock of business sites and their ongoing potential for employment development within the plan period.

Policies SA4 and SA5

- 11 Policy SA4 allocates sites for new B Class employment purposes in order to deliver the strategy to support business growth and to direct it to certain areas in line with the wider spatial strategy. The allocation provides them with a degree of protection from development for other uses. Sufficient land is allocated to meet the employment land needs of business growth over the plan period, to provide choice to the commercial market, and to help provide for a sustainable balance of land uses across North Somerset. Similarly Policy SA5 safeguards existing B Class business sites in order to try and retain a stock of functioning business sites.
- 12 Allocations are a recognised means of achieving this, helping to ensure that a selection of sites are retained to meet business needs be it expansion or opportunities for new business development. However it is recognised in line with paragraph 22 of the NPPF that there has to be a reasonable prospect of the site being used for this purpose, and if there isn't, the long term allocation should be avoided.
- 13 It is the Council's view that SA4 and SA5 are in accordance with Government policy and the objectives of supporting the economy. These policies are considered critical to helping facilitate business growth, and more sustainable development generally, in this context.

Policy SA6

- 14 Policy SA6 is a wider reaching policy applying more generally to economic uses, and seeks to retain sites in economic use unless the stated criteria can be met. Again this is considered to be in accordance with the NPPF, specifically as there is a mechanism built into the policy that would allow sites that don't provide a suitable opportunity to meet economic needs to be developed for other uses.
- 3.2 (i) Are there any employment sites within Schedules 2 or 3 which should be excluded or amended in order to make the plan sound?**
- 15 The following paragraphs summarise the objections received to specific employment sites and set out the Council's response.
- 16 **M Stowell** (14828417//1 page 367 of Schedule of Comments Received on Publication Version) objects to the removal of land at Clevedon 5/20 Kenn Road Business Park; specifically the removal of the allocation covering Portbury House. It is suggested there have been no material change in circumstances since the site was previously allocated in the Replacement Local Plan and that in order to make the policy sound, the allocation at Portbury House should be reinstated.
- 17 In response, the Listed Building status of the site is considered sufficient to remove the allocation from this part of the site. It is not considered that the loss of Portbury House from the allocation would be significant in the context of the wider Clevedon 5/20 site and the adjacent west of Kenn Road allocation. In addition Policy DM54 *Employment development on previously developed land in the countryside*¹, allows for the development of previously developed sites in the countryside for economic uses subject to criteria being met and in this case Policy DM4, *Listed Buildings* and possibly others would need to be satisfied. It is therefore considered that the removal of the allocation would not necessarily prohibit the site's development for economic uses.
- 18 **St Modwen Properties PLC** (3568545//4 page 368 of Schedule of Comments Received on Publication Version) object to the allocation of land to the west of Kenn Road in favour of a 'residential-led' scheme for which an application was submitted in July 2016 (ref: 16/P/1901/O). St Modwen explain that this was supported by an economic statement demonstrating why the site has not been delivered, and that this evidence has not been considered in progressing the employment allocation. They also submit that the employment allocation in

¹ North Somerset Council, Development Management Policies, Sites and Policies Part 1 Plan (adopted 2016)

Clevedon is disproportionately high, and that the only way of achieving any form of employment is through a residential led scheme.

- 19 Given the strategic location of the site close to the M5 being located within an identified M5 corridor sub-market area², its previous allocation in the Replacement Local Plan, and the comparable build-out of the Clevedon 5/20 site, it is considered to offer a suitable location and has a realistic prospect of coming forward up to 2026 given the duration of the plan still to take effect.
- 20 In the supporting documents to the residential-led application, the main reason given for the site not having a reasonable prospect of delivery is the viability of employment development taking into account upfront infrastructure works and the lack of a critical mass of business interest to date to support this. Speculative employment development has been scarce for some time since the market for commercial property was adversely impacted by the economic downturn and the resulting appetite for risk and securing of development finance became more constrained. However as further phases of strategic growth are being planned across the sub-region and economic growth is set to continue, it is considered that there would be demand for such sites.
- 21 The West of England Economic Development Needs Assessment (2016) positions Clevedon as a well accessed, centralised location within the functional economic market area stretching from Avonmouth and Portbury to Weston-super-Mare. Moreover, Table 5-12 of the EDNA identifies this site as an element of the Clevedon Business Park, one of four key employment sites for the West of England in North Somerset. A location which continues to see continued interest in new commercial, particularly Use Class B1c & B2 (industrial) premises.
- 22 A visit to Clevedon Business Park and other employment sites at the start of 2017 highlighted diminishing land availability, with only 20,000 ft² available across the totality of Clevedon's business parks for both office and industrial.
- 23 A review of available Bristol Property Agent Association data for 2016 showed that 25% of the total office take up in the Bristol out of town market, related to Clevedon³ indicating a strong demand in this location. This equated to 51% of total take up in North Somerset for the same period.
- 24 A review of available office deals in Clevedon and surrounding area (2010 to present day) shows an upward trend in price from circa £10/square foot to

² West of England (2016) Economic Development Needs Assessment

³ Bristol out of town covers North Somerset, South Gloucestershire and periphery of Bristol City.

£13.50/square foot (in line with wider market). The latter being achieved in early summer 2016 for Building 1, Rivermead Court. This suggests an improving commercial market for business premises, increased demand for premises and potentially a more limited supply.

- 25 Commercial activity in Clevedon can be characterised through several buoyant sectors including: high value manufacturing, technology media and telecoms and service sector. However, its geographic position on the M5 corridor places it well to accommodate strategic opportunities relating particularly to Hinkley Point C (HPC). The Council understands there to be some 34 businesses across varying sectors on the HPC supply chain portal located in Clevedon and surrounding area with work ongoing to increase this number and nuclear related land inward investment opportunities⁴.
- 26 Historically businesses displaced from Clevedon have looked to Portishead, Portbury and neighbouring business locations in the South Bristol fringe for available sites and premises. However, these locations are also seeing similar diminishing availability through lack of supply (new and second hand premises). The supply of B Class sites has reduced as a result of allocated sites being taken for non-business uses.
- 27 A review of prior approval change of use applications over a period of six years for Portishead, Clevedon, Nailsea and Gordano shows approximately 74,400 ft² previously removed or in the process of conversion to residential at the start of 2017. Based on Homes and Communities Agency employment density guidelines this is floor space equivalent to approximately 600 FTEs.
- 28 As further context, a note from Bristol Industrial Agents Association on 2016 take-up is attached, this sets out in brief the restrained supply situation for B1c, B2 and B8 in the West of England including all of North Somerset.
- 29 In summary, the site at Kenn Road is considered to be important in providing an opportunity to meet business needs in the remainder of the plan period, in the context of increasing economic growth, increased demand and only limited supply for specific business sectors. The location occupies a strategic location within an identified economic sub-market area stretching from WSM to Bristol

⁴ Hinkley Point C: As one of the single largest construction projects ever awarded in Europe, West of England and North Somerset will be key beneficiaries due to availability of office accommodation, connectivity and talent pool.

It is estimated that there will be 25,000 jobs directly linked to the construction phase over 10 years. This excludes the sub contracts and tier 4 employment. 900 people will be employed at the power plant upon completion of the construction.

along the M5 where good accessibility to the M5 is recognised as a beneficial feature.

- 30 **Nailsea Action Group** (14823809//10 page 370 of Schedule of Comments Received on Publication Version) state that the North West Nailsea site is inappropriate due to flood risk, and more generally question the suitability of any employment allocation at Nailsea.
- 31 In response, according to the Council's Strategic Flood Risk Assessment, the proposed employment allocation is not located within either the tidal or fluvial flood risk zone. However that is not to say the site is not subject to other forms of flood risk and a Flood Risk Assessment would be required to inform any proposal for development. This may require measures associated with the development to address any flood risk. There is a low (1-in-1000-year) risk of surface water flooding affecting parts of the northern and eastern boundaries of the site but this cannot be considered a significant constraint for a 'less vulnerable' use such as offices or general industry.
- 32 Given the high level of residential development proposed for Nailsea it is entirely appropriate that some employment land is allocated in order to achieve a balanced community and minimise out-commuting.
- 33 **CSJ Planning** (14574657//2 page 372 of Schedule of Comments Received on Publication Version) object to the allocation of the Gordano Gate site at Portishead on the grounds that it is contrary to national policy and the existing circumstances on site.
- 34 In response, the reasons for objection to the proposed allocation are lack of interest in the site for business use. There has been a notable erosion of land in Portishead for business use and a significant expansion of the resident population through the Ashlands development and development around the harbour area. In relation to the site's existing circumstances, the suitability of any proposed employment use in future on the site would be addressed at the planning application stage taking into account neighbouring land uses and the demand for employment premises.
- 35 The EDNA places Portishead as a key location within a functional economic market area from Avonmouth and Portbury to Weston-super-Mare. Table 5-12 of the EDNA identifies the town and its business parks as one of four key employment site for the West of England in North Somerset, particularly for office and B2 premises.
- 36 It is widely accepted the short term market has a fluctuating position of availability both within office and industrial segments. However, in common

with wider West of England market, the long term trend is one of diminishing supply driving rental incomes⁵ and reducing occupation incentives.

- 37 The Council is aware of enquiry levels steadily improving over the last 12-24 months with a number of businesses either located to the town (i.e. Handlesbanken, Cyient and Cook Brown) or expanding existing operations (i.e. Viper Subsea, One Post and Thrive). Agents and Invest Bristol Bath (LEP inward investment body) report the latter part of 2016 and 2017, meaningful enquiries and premises visits remain healthy across all market segments.
- 38 Both elements of this allocation are subject to planning negotiation. NSC are taking a pragmatic approach to the proposed delivery of employment space and associated additional support for the wider economy of Portishead in the longer term.
- 39 Any policy or proposal that would see the total removal of employment space in this element of Gordano Gate will be resisted as undermining the ability of the town to support the market's view of Portishead as a location of increasing standing. "It is a sign of the growing commercial importance of Portishead that Handelsbanken has chosen to open a new branch in the town to service clients along this stretch of the M5 corridor"⁶.
- 40 **Wrington Parish Council** (1019201//9 page 374 of Schedule of Comments Received on Publication Version) suggest altering the allocation for Havyatt Business Park to reflect the existing built structures and the agreed warehouse permission. Further development has implications for flood risk, transport, and countryside setting.
- 41 In response, the proposed allocation has been subject to review and carried forward from the previous allocation in the Replacement Local Plan. In relation to flood risk, mapping shows the edge of the site to be in flood zone 2, a lower risk location where employment development is permissible. There is fluvial flood zone 3b shown just outside the allocation linked to the Congresbury Yeo. At planning application stage it is likely that a Flood Risk Assessment would be required to assess any flooding implications associated with development.
- 42 Located less than a mile from the A38 and following that route some 4 miles from Bristol Airport, Havyatt Business Park and associated commercial premises are regarded as a successful and thriving location for B1c and B2 activities. Beyond this being the centre of operations for Butcombe Brewery

⁵ As an example, Portis Fields (Middle Bridge Business Park), where three deals from August 2010, April 2012 and December 2014 for office accommodation saw rental increase from £12 to £13.50 psf. This increase being largely attributable to lack of supply allowing Grade B stock to maintain position.

⁶ Tom Dugay, senior surveyor at Alder King Press Release, August 2016.

there are also a cluster of long-established specialist hydraulic engineering companies including PJ Hare located here.

- 43 In common with other smaller-scale, similarly highly accessible commercial locations Havyatt Business Park has a continuing role to play in the North Somerset economy, providing much needed premises, in a market with significant supply side issues, suitable for modern commercial activities – particularly engineering. Any policy or action to in anyway undermine the success of Havyatt Business Park would be resisted by NSC as it would create a significant difficulty, in terms of relocation, for several long-established and successful businesses with likely resultant job losses.

Are there any sites which are safeguarded for employment in Schedule 3 which should be removed in order to make the Plan sound?

- 44 **Amethyst** (15152929//1 page 375 of Schedule of Comments Received on Publication Version) object to the safeguarding of 173-175 Kenn Road, north of Tesco, Clevedon, stating that it has not been the subject of detailed assessment to inform its safeguarding.
- 45 In response, a range of sites have been identified as having a significant role in providing existing business use, and the intention is that these should be given an element of protection from development for other uses. This approach seeks to retain a stock of existing B Class land and premises.
- 46 The employment buildings on the site north of Tesco are modern and currently occupied. They have good access to the local and strategic highway network and form an important element of the diminishing range of modern employment buildings in Clevedon. They have never appeared on any register of available buildings which either suggests they have been permanently occupied or have not been vacant for any length of time. There is no record of any complaints from neighbouring residential properties over noise etc.
- 47 Whilst Policy SA5 seeks to safeguard certain sites and premises in existing B Class use, Policy SA6 read in conjunction allows a policy mechanism to secure other, non-economic uses of such sites where certain criteria are met.
- 48 **F1 real estate Management** (16093537//1 page 377 of Schedule of Comments Received on Publication Version) object to the safeguarding of Waverley House, Old Church Road, Clevedon, stating that the Council have not produced any evidence that there is a reasonable prospect for the site being used for employment uses throughout the whole plan period.
- 49 In response, there is currently an application for prior approval to change the site from B1a to 21 residential units. If approved this would negate the need for

the safeguarding designation and consideration would be given to removing site from schedule.

- 50 **Alder King** (14896737//2 page 381 of Schedule of Comments Received on Publication Version) object to the safeguarding of Gordano Gate (Serbert Road).
- 51 The EDNA (2016) places Portishead as a key centralised location within the functional economic market area stretching from Avonmouth and Portbury to Weston-super-Mare. Moreover, Table 5-12 of the EDNA identifies the town and its business parks as one of four key employment site for the West of England in North Somerset, particularly for office and B2 premises.
- 52 It is widely accepted that the short term market has a fluctuating position of availability both within office and industrial segments. However, in common with the wider West of England market, the long term trend is one of diminishing supply driving rental income⁷. The Council is aware of enquiry levels steadily improving over the last 12-24 months with a number of businesses either located to the town (i.e. Handlesbanken/Cyient and Cook Brown) or expanding existing operations (i.e. Viper Subsea, One Post and Thrive). Agents and Invest Bristol Bath (LEP inward investment body) report the latter part of 2016 and 2017, meaningful enquiries and premises visits remain healthy across all market segments.
- 53 The Council is exploring non-property programmes to assist the longer term growth of the town for example the use of local labour agreements, and employment trust funds. It is vital that existing occupied and thriving business parks and commercial locations are maintained. Any policy mechanism which seeks to alter the status of safeguarded sites would not be supported as it will undermine the long-term growth prospects for Portishead.

Response to objections raised in relation to Old Mill Road, Portishead.

- 54 A detailed response is set out at Appendix 1.

Matter 3.2 (ii): In Policy SA6, what does the term ‘economic use’ cover?

- 55 The definition of economic use is intended to cover the range of existing B Class use. To avoid conflict with other policies where there are other

⁷ A single example from the data is Portis Fields (Middle Bridge Business Park), where three deals from August 2010, April 2012 and December 2014 for office accommodation saw rental increase from £12 to £13.50 psf. This increase being largely attributable to lack of supply allowing Grade B stock to maintain position.

safeguarding policies in place e.g. retail, it is suggested that this could be clarified in the policy text.

Matter 3.2 (iii): Would the policies allow for an extension to an existing employment sites such as Stowell concrete at Yatton?

- 56 Policies SA4, SA5 and SA6 relate to specific allocated, safeguarded and existing sites. Extensions of B Class operations onto land allocated would be supported in principle. Extensions outside of these areas would be subject to policies in the Development Plan generally including for example DM53: Employment Development on Greenfield Sites in the Countryside, and DM55: Extensions. Ancillary buildings of the intensification of use for existing businesses located in the countryside. DM53 prioritises the re-use of existing sites and buildings in order to protect the character and appearance of the countryside. Provided the specific criteria are met, new employment development will be permissible. Policy DM55 seeks to support the expansion of rural businesses providing development is in keeping with the rural context. In both policies design considerations are important to ensure the development is sensitive to the rural context.

Matter 3.2 (iv): Should more employment land be allocated at Nailsea in order to secure employment-led development?

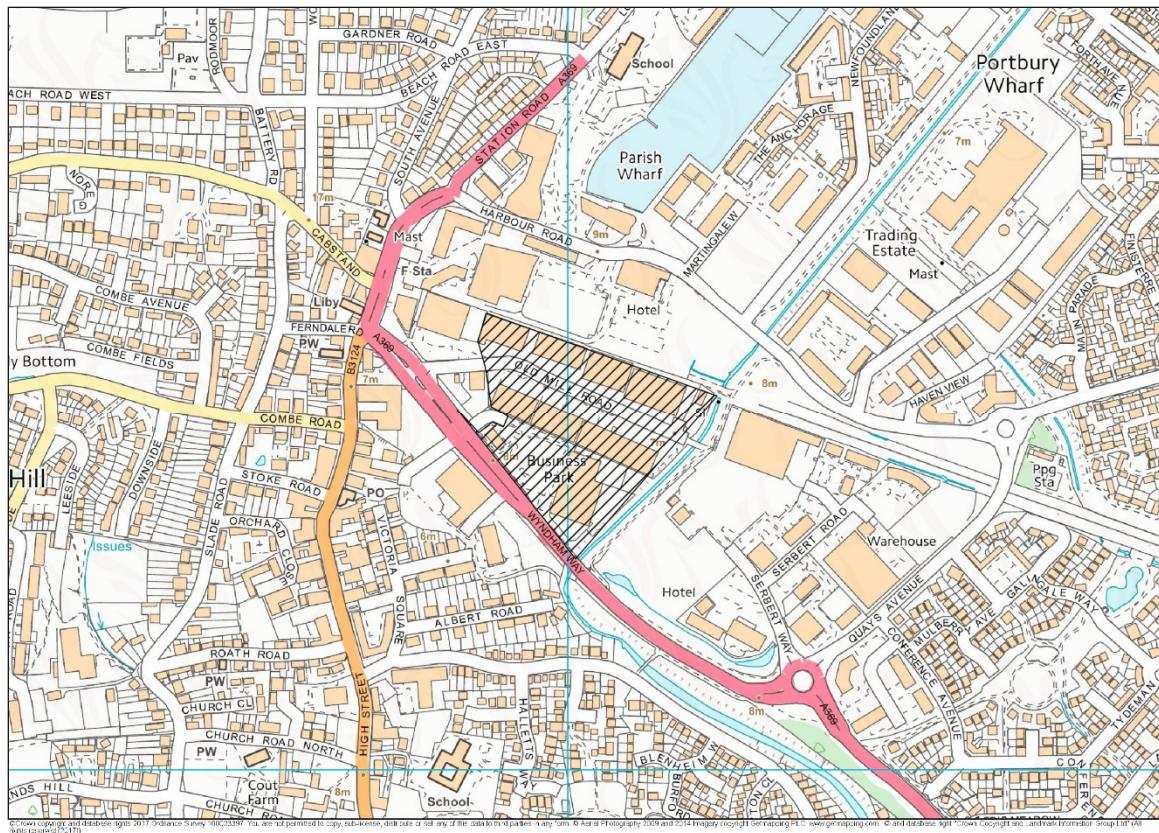
- 57 It is considered that sufficient land is proposed at Nailsea through the Site Allocations Plan. Longer term, additional land would likely be required in relation to further strategic growth and this would require a comprehensive review of employment land in the town.
- 58 The future economic prospects for the Nailsea area and indeed wider North Somerset are currently being considered through the emerging Joint Spatial Plan. It is likely that the requirements for strategic transport interventions and new strategic development will provide an impetus to review and provide a strategy for new economic growth as part of the new Local Plan.

APPENDIX 1

Old Mill Road , Portishead

The Site Allocation Plan allocates the existing employment site at Old Mill Road for redevelopment as a mixed use site. This 4.6 hectare site is currently occupied by 25 employment units, a Homebase/Argos store and is located north east of Wyndham Way Portishead.

The unit sizes range from 2,000 ft² to 35,000 ft².



Background

The site was first allocated for a mixed use in the Sites and Policies Part 1 (Consultation draft Feb 2013) with the suggested uses being a mix of retail, leisure, cafes, bars and restaurants. This generated very limited opposition (4 objections). Work on the Sites and Policies Plan was halted due to uncertainty over Core Strategy housing numbers and only the Development Management Policies were progressed. This resulted in the site along with others in the vicinity being included within the new Town Centre boundary of Portishead where Policy DM60 of the adopted Sites and Policies: Part 1 Development Management Policies applies.

In the March 2016 Site Allocations Plan (Consultation Draft version) the site was again allocated for mixed use with an estimated capacity of 20 residential units. This allocation only generated one response from the landowner who requested that the site boundaries be extended, the residential capacity of 20 to be deleted as the site

may have greater potential and the list of possible uses extended to all town centre uses.

The responses to the March 2016 Site Allocations Plan (Consultation Draft) were reported to the 18th October Executive Committee (SD/16) with a recommendation that in order to reflect developer aspirations and facilitate the comprehensive development of the site the capacity be increased from 20 to 100 residential units with the allocated area extended.

The recommendation relating to the increased capacity was not supported by the 18th October 2016 Executive Committee (SD/17) and the Oct 2016 Publication version of the SAP indicated that the site could accommodate 20 residential units

Following consultation on the October 2016 Publication Version and consideration of objections by the 24th January 2017 Strategic Planning and Economic Development Scrutiny Panel (SD18) and the 7th February 2017 Executive Committee (SD/20 and SD/19), it was resolved that the residential capacity of the site should be unspecified and that no net loss of employment capacity would be supported

The site specific requirements of the site as proposed to be modified (SD/20) and set out in Schedule 1 are now as follows:

"Proposed as a mix of employment uses, retail, leisure, café's, bars and restaurants and potential for a small amount of residential.

Pedestrian/cycleway links to dockside development, adjacent supermarket and proposed rail station required.

Existing businesses to be relocated or incorporated into redevelopment scheme.

No net loss of employment capacity will be supported.

A Flood Risk Assessment, sequential and exception test will need to accompany any planning application"

Objections to allocation of Old Mill Rd, Portishead as a mixed use site.

There were 34 objections to the allocation of this site and these are recorded on Pages 243 to 330 of SD/4 (Schedule of Comments received on Publication Version October 2016 – subject order)

The objections to the allocation can be summarised as;

- Loss of employment units at a time when market demand for such uses and out commuting for work are high;
- The loss of existing and thriving businesses at a location which is very accessible to existing and future residents of Portishead;
- The lack of alternative premises and sites for existing businesses to be relocated to;
- The need for additional residential development and redevelopment does not outweigh the harm caused by the loss of existing businesses and employment units;

- The policy conflict with Policy SA6 which seeks to protect land in existing economic use;
- Loss of local skilled jobs for the resident workforce;
- Old Mill Rd is of such importance that it should be treated as a Safeguarded Employment site (Schedule 3 of SAP)

In addition to the above objections there was a representation from the freeholders (Standard Life Investments 16123553/1) which can be summarised as:

- In the absence of an up to date assessment of the realistic deliverable residential capacity of the site, the reference to 20 units at Schedule 1 should be deleted or, should be qualified as a minimum;
- There is no policy basis or evidence to justify redevelopment proposals having to relocate existing businesses or incorporate existing businesses into a redevelopment scheme;
- Given the site's town centre location there is no explicit requirement for redevelopment of the site to provide all of the stated uses;
- It should be recognised that the ability of the site to provide pedestrian/cycleway links only extends to the edge of the site;
- Policy SA/6 needs to be amended to allow the alternative use of existing employment sites that are allocated in the SAP for alternative use

Justification for allocation of the site for mixed use.

Following recent developments the Old Mill Road site is now effectively surrounded by retail development and this has led to the site being included within the town centre boundary for Portishead.(Policy DM/60 Sites and Policies Part 1 : Development Management Policies).

Policy DM/60 states:

The boundaries of the town centres of Clevedon, Nailsea, Portishead and Weston-super-Mare are defined on the Proposals Map. The vibrancy, vitality and community focus provided by the town centres will be maintained and enhanced. Proposals for main town centre uses within these areas will, in principle, be supported where they:

- *Make a positive contribution to the centre's identity and heritage.*
- *Increase job, education and training opportunities.*
- *Enhance the mix or quality of uses at the centre.*
- *Create additional community benefits and activities.*
- *Increase the activity and footfall in the centre, including supporting the evening economy.*
- *Secure the redevelopment or improvement of buildings, features or areas which detract from the quality or appearance of the centre.*
- *Enhance the built environment and public realm.*
- *Do not adversely impact on the role and function of the centre.*
- *Do not prejudice the delivery of proposed redevelopment schemes.*

- *Retain or increase the amount and quality of public car parking spaces available.*

In addition the supporting text to Policy DM/60 states that “*Residential development within the centres is encouraged especially as part of mixed use schemes using upper floors with other uses on the ground floor.*”

The redevelopment of the Old Mill Road site is therefore compliant with Policy DM 60 and also the NPPF which in Para 23 highlights the need to:

- promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
- allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres
- recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites

The redevelopment of the site will provide an opportunity for an increase in leisure and retail facilities which will help remove the need for residents to travel outside of the town to meet their needs. The town lacks a cinema and major leisure facility and this site could meet this requirement. It is understood that the landowners have assessed the market potential for such uses. Such uses would be in accordance with Policy DM60 and require a central location to take advantage of the good accessibility, linked trips and parking that town centres offer.

The site in its present form represents a barrier to better connectivity between the existing High Street and the marina area. A redevelopment scheme with the provision of direct pedestrian and cycleway links would help to improve this connectivity to the benefit of all surrounding uses.

The site has received little investment in recent years and although this is unsurprising due to the short term leases offered, the visual and environmental improvements that could be obtained through redevelopment are clear. It would be the Council’s intention to replicate the high standard of urban development and public realm that has been achieved to the north of the site around the marina.

The site specific requirement now state that “*No net loss of employment capacity will be supported.*” Although it is accepted that the jobs created by the redevelopment will be different to that on site at the moment the Council have given a commitment to no net loss. All of the premises are on a short lease (with the exception of Homebase/Argos) and it is possible that many of the businesses will relocate to premises/land as and when opportunities arise over the coming year.

The redevelopment of the site will offer opportunities for some of the existing uses that are compatible with a mixed use e.g. gym, nursery although it is accepted that some uses e.g. garage, wood manufacture will need to relocate elsewhere if they are

to continue operating in the area. Staff in the Council's Economic Development section are available to assist businesses for their search for alternative units/land.

To safeguard the site for employment uses would potentially sterilize a site that offers considerable potential and opportunity to upgrade the urban fabric, improve connections and provide a wide range of town centre uses.

Council's response to Standard Life's objections

In the absence of an up to date assessment of the realistic deliverable residential capacity of the site, the reference to 20 units at Schedule 1 should be deleted or, should be qualified as a minimum.

The site specific requirements do not specify a numerical target/capacity for the site but does state that the site has "*potential for a small amount of residential*" development.

If the site is to deliver no net loss of employment and a wide range of uses e.g. leisure, cafes, restaurants, offices etc then the potential for large scale residential development will be limited. It is envisaged that any residential development will be above ground floor and the impact on the urban fabric, parking, amenity etc will need to be addressed at the planning application stage using the policies contained in Sites and Policies Part 1: Development Management Policies

There is no policy basis or evidence to justify redevelopment proposals having to relocate existing businesses or incorporate existing businesses into a redevelopment scheme.

Portishead is a town that has experienced a high level of residential growth with limited commensurate employment development. This is despite the Council allocating larger tracts of land for employment use. It is only recently that demand for employment units and land has picked up.

Although there is no legal requirement for Standard Life to relocate existing businesses or incorporate existing businesses into a redevelopment scheme, the Council's Economic Development section are happy to assist this process. The existing uses in Old Mill Rd provide a valuable local service and the Council would expect Standard Life in conjunction with the Council to take positive action on this aspect

Given the site's town centre location there is no explicit requirement for redevelopment of the site to provide all of the stated uses.

The NPPF defines main town centre uses as: "*Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development*

(including theatres, museums, galleries and concert halls, hotels and conference facilities)."

The council would not object in principle to a mix of any of these uses provided there is no net employment loss. The list in the site specific requirements should not be viewed as being exhaustive.

It should be recognised that the ability of the site to provide pedestrian/cycleway links only extends to the edge of the site.

The potential of the site to improve connectivity between the marina and the High Street is one of the reasons for seeking redevelopment of the site. The need for direct pedestrian/cycleway links through the site are paramount and it is a legitimate stance to insist that these are provided as part of the comprehensive development of the area. Although land bordering the site is in different ownership it is only one new link to the north of the site (into Waitrose Car park) that is required.

Policy SA/6 needs to be amended to allow the alternative use of existing employment sites that are allocated in the SAP for alternative use.

The Council does not see any need for this change It would be perverse to allocate an existing employment site for alternative use and then refuse a proposal because it would involve the loss of employment land. An allocation would overrule any in principle policy objections that may arise. Once the development is completed then Policy SA/6 would become material in protecting employment uses.

Boundary of the site

The Publication Version Oct 2016 failed to include all the minor revisions to the boundary that were requested by the landowners. Although Homebase and Argos were included a small area at the western entrance to the site was omitted.

The agents for the landowner have subsequently clarified the boundary of the site (see plan) and the Council would not have any objection if this boundary was confirmed as part of the allocation.

