



Matter 3 - Employment

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**NORTH SOMERSET
SITE ALLOCATIONS PLAN
EXAMINATION**

North Somerset Site Allocations Plan

Matter 3 – Employment

3.1 Does the SAP provide for the distribution and delivery of employment land as required in CS Policy CS20? Our concern is that the Council does not provide any direct monitoring of the requirements in Policy CS20, which we would expect to find within its Annual Monitoring Report (AMR).

1. Policy CS20 seeks the following:
 - 10,100 additional employment opportunities;
 - 114 hectares of land for B1, B2, B8 uses;
 - 1.5 jobs per home at Weston Villages and on sites over 10 dwellings or more in Weston-super-Mare;
 - It supports new employment in Clevedon, Nailsea and Portishead;
 - It supports '*economic activity*' appropriate to the scale of the settlement elsewhere;
 - It provides at paragraph 3.258 an indicative allocation.
2. In comparison the Annual Monitoring Report monitors the following employment issues:
 - Percentage breakdown of employment structure;
 - Income;
 - Total amount of additional floor space by type;
 - Total amount of large site employment floor space gain on previously developed land by type;
 - It describes the various employment policies (Core Strategy, Junction 21 EA, LDO, Local Economic Development protocol, other initiatives).
3. In addition through the Weston Villages Joint Delivery Review Board (JDRB) there is separate monitoring of employment delivery and jobs in Weston Villages.
4. However, none of the monitoring specifically assesses provision against the policy requirements and other than through the JDRB for Weston Villages there is no monitoring at all of job provision against the overall requirement for 10,100 additional employment opportunities.
5. Also given that an indicative employment allocation is set out in supporting paragraph 3.258 of the Core Strategy, which sets out employment allocations for the Weston Urban Area, Weston Villages, Clevedon, Nailsea, Portishead and the remainder of the district, it is also surprising that direct monitoring against these figures is not provided in the AMR. We have therefore compared the indicative allocations in the CS with the proposed allocations in Schedule 2 of the SAP, set out in Table 1 below.

Table 1 Proposed Employment Distribution

	Proposed	Area (HA)	Percentage	
	CS ¹	SAP ²	CS ¹	SAP ²
Weston Urban Area	42.82	28.9	38%	34%
Weston Villages	37.70	41.6 ³	33%	49%
Clevedon	8.95	10.3	8%	12%
Nailsea	1.40	1.5	1%	2%
Portishead	3.17	1.6	3%	2%
Remainder	18.87	1.61	17%	2%
Total	113.91	85.51		

- Notes
1. From Core Strategy paragraph 3.258
 2. From SAP schedule 2.
 3. Weston Villages 17.6 HA and Haywood Village 24.0 HA.
6. Clearly this analysis does not take account of completions. We note that in paragraph 4.31 of the SAP the Council agree to consider providing additional detail relating to the deliverability of the allocated employment land supply. At the very least it would be helpful to include our Table 1, with an additional column including completions, in the AMR. We also accept that the total 'B' class completion set out in Table 1 of CD1 would indicate that in total these completed sites together with the SAP allocations would in total exceed CS20 requirements but there is no detail to support that on a spatial basis. There are clear differences in a number of areas particularly the increase in allocations in Weston Villages compared with the Core Strategy figure and the substantial reduction for the remainder of the district.
7. Given this lack of monitoring in the AMR the opportunity could have been taken to provide an assessment against the Core Strategy in background document SD11, Employment Allocations background paper. Rather than a quantitative assessment this paper carries out a qualitative assessment of existing employment allocations and assessing an overall score for each site against a range of criteria. As useful as this is it does not add anything to the monitoring of employment provision or assess what has been delivered against Core Strategy requirements to date in order to assess what the SAP needs to deliver in the remaining plan period.
8. Therefore there is no specific monitoring information which demonstrates that the SAP will provide for the distribution and delivery of employment land required in Core Strategy Policy CS20.

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

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

1. The main guidance in NPPF22 says '*planning policies should avoid the long-term protection of sites allocated for employment use where there is no prospect of the site being used for that purpose*' (our emphasis). Schedule 2 of the SAP includes 85.51 hectares of employment allocated land. This includes the following sites carried over from the replacement Local Plan 1996-2011 which was adopted in 2007 but began life with a consultation draft in September 1993. Therefore the following sites have been potential allocations for nearly 25 years and have yet to come forward.

Table 2 Adopted Local Plan Employment Allocations

Ref	Site	Area	Comments
E39	West of Kenn Road	8.2	Call for Sites for alternative use
E26	Clevedon 5/20	2.1	Separate parcels in business park
E28	Estune Park Long Ashton	0.38	Adjoins existing housing, residential application refused
E29	Havyatt BP, Wroughton	0.51	Part of business park, area revised
E32	Park Farm, Yatton	0.42	Deallocated – deal with through development management

2. One site (Park Farm) is deallocated and two, Clevedon 5/20 and Havyatt Business Park, are effectively separate plots within existing business parks. However, in two cases there are indications that existing owners are actually seeking alternative uses where 8.2 hectares West of Kenn has been submitted in a Call for Sites for alternative uses and at Long Ashton Research Station, on 0.3 hectares, there is a refused planning application for residential use on the land which in any event adjoins an existing residential area. On this basis we consider there are clear doubts as to whether these two sites will be used for employment purposes and satisfy NPPF22.
3. There is also a lack of clarity about the list of employment allocations. The list in Schedule 2 of the SAP is different to the table in background document SD11 at paragraph 25 which is entitled '*list of allocations taking into account revised areas and discounted sites*' (emphasis as in original document). Then document CD1 (21st March 2017) included at Table 2 an updated list of Proposed Employment Sites, which slightly amends some site areas from the original SAP schedule but omits the additional '*allocations*' introduced in SD11. The respective allocations are set in table 3 below.

Table 3 Proposed Employment Allocations

	SAP Schedule	Document SD11 Pages 39-41		Doc CD1 Table 2 Allocation
		Allocation	Deallocation	
Weston Villages	17.6			17.6
Haywood Village	24.0	24.0		24.0
West Wick Business Park	4.7	4.7		4.7
Europark	13.6	13.56		13.6
Weston Gateway	1.2	1.2		1.2
Summer Lane	3.6	3.61		3.6
Aisecombe Way	0.5		1.7	0.5
Moor Park A371	5.3	5.3		5.3
West of Kenn Road	8.2	8.2		8.2
Clevedon 5/20	2.1	2.06		2.1
NW Nailsea	1.5			1.5
Gordano Gate	1.6	1.6	5.2	1.6
Elliott Medway, Congresbury	0.3			0.3
Long Ashton Research Station	0.31	0.38		0.38
Havyatt BP, Wrington	0.51	0.51		0.51
Park Farm, Yatton	0.42		0.4	0.42
Portishead Quays		2.91		
West of Winterstoke Road		0.5		
Sunnyside Road		1.2		
Gasworks		1.9		
Herluin Way		8.5		
Bridge Farm		0.5		
Severn Paper Mill		1.5		

4. There are 16 allocated sites in SD1 and CD1, 18 in SD11, of which 11 allocations are common to both. In addition 3 of the SD1 allocations are shown as deallocations in SD11 but for different total areas. This lack of clarity creates a soundness issue because it is not clear that the plan is positively prepared, that it will meet assessed Core Strategy employment requirements and that it is not justified and not based on an appropriate strategy and proportional evidence.

ii) In Policy SA6, what does the term 'economic use' cover?

5. We raised the issue of the meaning of the term 'economic use' in our previous representations on both the Consultation Draft and the Publication Draft plans. This was in the context of the lack of clarity in Policies SA4, SA5 and SA6. We continue to rely on our Publication Draft comments (reference 3361153//11).
6. It is difficult to comment further until the Council provide a definition of land in existing economic use. The other issues we raised in previous comments concerning the relationship between the three policies can then be properly considered.
7. In those responses we set out 4 matters the employment policies need to address – a policy to allocate proposed employment sites, a policy to safeguard existing employment sites, criteria for dealing with non B class uses on both new and existing sites and the definition of 'economic use' if policy SA6 is retained. To that we would now add, in response to question 3.2 (iii), guidance on extensions to safeguarded and non-safeguarded employment sites and sites in existing economic use.