

# **NORTH SOMERSET SITE ALLOCATIONS PLAN EXAMINATION**

**MATTER 3**

**EMPLOYMENT**

**POSITION STATEMENT**

**ON BEHALF OF**

**MOOR PARK (NORTH SOMERSET) LTD**





## Contents

<b>1 Introduction</b>	<b>3</b>
<b>2 Issue 3.1</b>	<b>4</b>
<b>3 Issue 3.2</b>	<b>7</b>

RA Ref: MOOR0001

LPA Ref: -

Office Address: Number One  
Queen Square Place  
Bath  
BA1 2LL

Telephone: +44 (0)1225 433675

Date of Issue: April 2017

## 1. Introduction

1.1 This Position Statement sets out a brief response on behalf of Moor Park (North Somerset) Ltd (MP) to the Inspector's questions in relation to Matter 3 .

1.2 It should be read in conjunction with the MP's submissions to:

- North Somerset Site Allocations Plan Consultation Draft (April 2016) (MP1)
- North Somerset Site Allocations Plan Publication Version (December 2016) (MP2)
- Position Statements relating to other matters identified by the Inspector for consideration at the Examination.

## 2. Issue 3.1

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

- 2.1 Policy CS20 establishes the employment-led approach to development within the district, with a particular focus at Weston-super-Mare where new residential development is to be provided in step with employment development. The objective is:

*... to achieve a more sustainable alignment between jobs and the economically active population across towns and villages in North Somerset. This seeks to increase their sustainability, self-containment, decrease out-commuting, provide for a range of local jobs and reduce carbon emissions from unsustainable car use. Priority will be given to the reuse of previously developed land and the safeguarding of sites in existing economic use (NSCS, Policy CS20, p.82)*

- 2.2 Whilst Policy CS20 will be applied through the development management process to planning applications relating to the mixed use and residential sites that are allocated in the SAP, particularly at Weston-super-Mare, there is little evidence that the policy has influenced the distribution of residential allocations to support the delivery of employment land in conjunction with established employment sites. A key case in point is the employment site which is identified as both a 'proposed employment site' of 5.3 hectares in Schedule 2 (Moor Park, A371), and a 'safeguarded employment site' of 4.5 hectares in Schedule 3 (Weston Business Park (Moor Park)).
- 2.3 The evidence from Schedule 2 confirms that Moor Park is the fourth largest employment allocation at Weston-super-Mare, and accounts for 6.2% of the overall employment land that is proposed to be allocated in the Plan.
- 2.4 Given the intention to bring forward housing in step with employment development to deliver the objectives set out in Policy CS20 as cited in paragraph 2.1 above, it is surprising that a strategic employment site of the size of the Weston Business Park is not accompanied by a housing allocation in the SAP. The site is a good fit with the strategic focus of employment development in CS20 to deliver 'gateway' regeneration, it being at the gateway to Weston-

super-Mare when approaching from the south east via the A371. Although the site is outside the development boundary of Weston-super-Mare, which has yet to be adjusted to incorporate the new villages of Haywood and Locking Parklands, the site is in extremely close proximity to Haywood Village in particular, and very well positioned to take advantage of existing and proposed transport, social and community infrastructure on the south side of Weston-super-Mare. Haywood village has, in effect, extended the urban area of Weston-super-Mare to the doorstep of the Weston Business Park. It is germane that Weston Business Park, and its immediate land to the south, were historically in use as part of the Weston Airfield on which the Haywood Village is now being developed.

- 2.5 The sustainable location of Moor Park is clearly illustrated on the Plan at Annex 4 to MP2. It is further highlighted by the Plan on page 2 of the brochure at Appendix 1 to this Statement which has been prepared in support of the current outline planning application<sup>1</sup> for mixed use development (commercial/residential) relating to the safeguarded/allocated employment site, and land to the south sandwiched between the existing business park and the Oaktree Residential Park.
- 2.6 The schedule below projects the number of households that an employment site the size of Moor Park could generate according to the uses that it supports. The projections are based on a site area of 5.3 hectares, assuming different land uses and percentage site coverage.

### Schedule 2.1

Use Type (Class)	Area per FTE (m <sup>2</sup> ) <sup>2</sup>	No. of Employees (% site coverage of 5.3 hectares)			Dwelling Requirement <sup>3</sup>
		30%	50%	70%	
Light Industry (Business Park) (B1c)	47	338	564	789	225-526
Business Park (B1a)	10	1,590	2,650	3,710	1,060-2,743
Industrial (General) (B2)	36	442	736	1,030	295-687
Warehouse & Distribution (B8)	70	227	379	530	151-353

<sup>1</sup> NSC Application Ref: 16/P/0329/O

<sup>2</sup> DCLG, Employment Densities Guide 2010, Table of Employment Densities, p. 6

<sup>3</sup> Assumes 1.5 economically active per dwelling, as per North Somerset 'Employment-led Delivery at Weston-super-Mare' SPD, November 2014

- 2.7 As is evident from the above, even assuming a low site coverage and a low employment density for a Class B8 use, a 5.3 hectare site could generate a requirement for approximately 151 dwellings based on 1.5 economically active persons per dwelling.
- 2.8 The conclusion from this is that the current employment allocations in the Plan do not provide for the distribution and delivery of employment land as required in Policy CS20. The existing Weston Business Park does not have immediately proximal housing associated with it. Moreover, the SAP is proposing a further substantial employment allocation that exceeds the size of the existing protected employment site, without associated housing development. That is in *prima facie* conflict with Policy CS20 that seeks to deliver employment and residential development in tandem, and to reduce unsustainable travel patterns by ensuring their co-location.
- 2.9 As outlined above, Weston Business Park is one of Weston-super-Mare's principal employment sites. Smurfit Kappa, the largest employer in the town, occupies one of the buildings as a secondary facility to their main factory on the Oldmixon Estate. The existing buildings are reaching the end of their economic life, and regeneration is essential to ensure that the safeguarded employment site continues to provide fit for purpose premises and that additional investment is made on the allocated land. A mixed use allocation, incorporating housing on land immediately to the south, is therefore essential not only to uphold the policy objective to deliver employment and residential development in tandem, but to ensure the future vitality and viability of the safeguarded and allocated employment areas.

### 3. Issue 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?***

3.1 Policy SA 4 is too narrowly focused in restricting the development of employment to new business development within the ‘B’ classes. The definition of ‘economic development’ in the NPPF is much broader in recognition of the broad spectrum of uses that generate jobs in a dynamic, diverse and evolving economy. The range of uses for which the policy provides on land allocated in Schedule 2 should therefore be broadened accordingly. As currently worded it is inconsistent with the NPPF.

3.2 The requirements for non B class uses to be ‘ancillary’ and on a ‘small scale’ are nebulous and do not provide sufficient clarity. The policy should not preclude non B class uses that are stand alone, employment generating enterprises in their own right, rather than ancillary to an existing or proposed user within Class B. Similarly, the notional percentage site area is arbitrary and fails to have regard to the potential contribution any such use might make to sustaining the wider area, including any business uses within the B classes located elsewhere within the vicinity.

3.3 Policy SA 4 is therefore too negatively disposed towards non B class uses which can both make an important contribution to employment in their own right, and contribute to developing and sustaining vital and viable employment locations overall, including supporting the wider business community beyond any particular site and locality.

- 3.4 It is clear from recent development on employment land at Haywood Village that the Council is assuming a very broad definition of employment uses, including educational uses and hotel development. This broad definition has been essential to ensure compliance with Policy CS20. There is a risk that the narrow definition assumed in Policy SA 4 will either preclude compliance with CS20, or alternatively result in a brake on housing delivery since employment development compliant with the definition in SA 4 is not being brought forward in tandem.
- 3.5 For similar reasons set out in relation to Policy SA 4 above relating to employment sites identified in Schedule 2, the provisions of Policy SA 5 are too negatively disposed towards non B class uses associated with existing employment sites identified in Schedule 3. Moreover, Policy SA 5 is even more restrictive in limiting non B class uses to a 'very' small scale. The reason(s) for the more restrictive approach in relation to existing employment sites compared with proposed new developments is unclear.
- 3.6 As with Policy SA 4, amendments are required to bring the policy into line with the NPPF and to allow for appropriate and necessary development to deliver sustainable business locations. Similarly to Policy SA 4, a very restrictive definition of employment development threatens compliance with Policy CS20, or alternatively could result in a brake on housing delivery.
- 3.7 Policy SA 6 is negatively worded and is therefore inconsistent with national policy set out in the NPPF (paragraph 22) that *"planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose"*. As currently worded and constructed, proposals on sites where there is no reasonable prospect of employment use or development could conflict with the policy criteria, and therefore be refused planning permission. Moreover, proposals that potentially deliver wider community benefits that outweigh the loss could also be held up due to *prima facie* conflict with the policy provisions.
- 3.8 The policy should be reworded to permit land in existing economic uses to change to other uses where the benefits outweigh any harm to economic objectives arising from the loss.

