



An **APLEONA** company

Report

St Catherine's Court
Berkeley Place
Bristol
BS8 1BQ

T: +44 (0)8449 02 03 04
F: +44 (0)117 988 5344

North Somerset Site Allocations Examination

Statement on behalf of St Modwen

Matter 3 Employment

April 2017



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Prepared by: Pete Stockall, Director
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For and on behalf of GVA Grimley Limited

1. Introduction & Context

1.1 This statement seeks to build upon the detailed representations submitted by GVA on behalf of St Modwen Developments Ltd in relation to their land interests within North Somerset which include amongst other sites:

- 'land west of Kenn Road', on the edge of Clevedon;
- Locking Parklands (former RAF Locking); and
- 'land west of Locking Parklands' (formerly 'Moss Land').

1.2 **This statement should be read in conjunction with our previous representations dated 28 April 2016 submitted in response to the consultation draft (March 2016) version of the Plan and 19th December 2016 submitted in response to the Publication draft version of the Plan (October 2016).** In summary we are wholly unconvinced that our previous submissions have been robustly assessed and considered. We have reviewed the Council's latest evidence for the Examination and in our opinion the documents do not provide a sound, fully tested and considered evidence base to justify the approach of the Plan. Our concerns focus on two key sites:

- **Land west of Kenn Road, Clevedon:** The evidence base does not justify the retention of the land as an employment allocation rather than a residential led scheme.
- **Locking Parklands and West of Locking Parklands:** In terms of the employment allocations and restrictions regarding employment to residential ratios.

2. Response to Inspector Questions

2.1 We deal with each of the Inspector's question in turn and make comments where considered appropriate.

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

2.2 The SAP allocates 10.3 hectares of land for employment within Clevedon under Policy SA4 which is above the 8.95 hectares within CS20. This level far exceeds the allocations for the other main settlements outside of Weston, noting 1.4 hectares in Nailsea and 3.17 hectares in Portishead despite these settlements being identified for significantly higher residential growth than Clevedon. We would argue that the disproportionate level of employment allocation for

Clevedon should therefore be redistributed to these other settlements in order to meet the key objective within CS20 for these towns of improving self-containment and reducing out commuting. This would not undermine the ability for Clevedon to maintain its self containment given the existing supply of other employment sites as set out within the schedules to SA4 and SA5.

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?

- 2.3 Our representations (April 2016 and December 2016) set out our specific concerns with regards to the continued allocation of **land west of Kenn Road, Clevedon within Schedule 2** for employment purposes. We have also set out in detail within our representations why we disagree with the Council's position on not considering the site for residential led development. As detailed within our representations, the land is owned by St Modwen who have been unable to deliver employment development on the site given the significant costs of opening up the site in terms of access, site levels and drainage, coupled with the lack of demand for commercial space within the town. Therefore given the costs of delivering the site are such, that a large operator (for virtually the whole site) is required to enable up front funding of site servicing. In the absence of such demand from the market, the site cannot be delivered, whereas a residential development on a significant part of the site would generate sufficient value to allow development to proceed.
- 2.4 On the basis of one of the Country's leading commercial developers (who clearly have a vested interest in delivering the site) not being able to make it work then the question has to be asked, who could? The Plan and its evidence base appears to fail to recognise this commercial reality and no justification is provided in terms of continuing to allocate the site for purely B class uses. The summary provided by the Council (Table 2 CD1) underlines the lack of detailed consideration to the reasons for the site not coming forward with their statement '*greenfield site with no known insurmountable constraints*'.
- 2.5 Should the Council be of the view that the Town requires the provision of this level of allocation (and again there is no evidence provided to demonstrate this) then in light of the lack of delivery through the previous Plan of this site, they should have sought to review alternative sites and there is no evidence of this exercise having taken place.
- 2.6 In light of the above identified constraints St Modwen has submitted an application for residential led development which includes 3 acres of employment, commercial or community uses. The application is undetermined but given the previous acceptance of development on this site (in light of the previous employment consents and the allocation)

and comments to date, there are not believed to be any technical or planning constraints which would preclude this site from coming forward for residential led development to make the required contribution to Clevedon in terms of family and affordable housing as set out within our statement for Matter 2 Housing.

- 2.7 Policy CS20 with the Core Strategy includes supporting text (paragraph 3.259) which clearly states that the land areas (except Weston Villages) are based on remaining allocations in the Replacement Local Plan that are envisaged to be rolled forward subject to a review process. We remain of the opinion (as stated within our representations) that despite the Council seeking to demonstrate to the contrary, a robust and commercially informed review for the sites identified under SA4 has not taken place. It is not acceptable in the context of NPPF guidance (notably paragraph 22 as highlighted below) for allocations to be ‘rolled forward’ without due consideration to the reasons for the site not coming forward during the previous plan period. Due regard must be given to market signals or different land uses to support sustainable local communities (noting our concerns raised within Matter 2 regarding the lack of residential allocations in Clevedon). As we have highlighted within our representations the current planning application is supported by detailed market evidence to justify the use of the site for alternative purposes.

NPPF Para 22. 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. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

- 2.8 The proposed allocations within the **Weston Villages** as set out in SA4 also require careful consideration on the basis of emerging concerns regarding the impact of the jobs to homes requirements (policy CS30) on the envisaged housing trajectory. We have also flagged concerns with the proposals map to ensure that it accurately reflects the consents on the ground within the Weston Villages.

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

- 2.9 No further comment.

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

- 2.10 No further comment.

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

2.11 As noted above (Q3.1) we would propose that a portion of the allocated employment provision is reallocated from Clevedon to Nailsea given the current imbalance.