

BATH & NORTH EAST SOMERSET COUNCIL RESPONSE TO ID/7

Issue 2: Is the spatial strategy for the delivery of housing & jobs justified & are there reasonable prospects for delivery consistent with national advice?

Sub Matter: Somer Valley

9.1 The vision is to create greater self-reliance in the area (a closer balance between jobs and housing). Is this closer balance the most appropriate aim and is it likely to be achieved by the proposed strategy in Policy SV1?

Appropriateness of objective

9.1.1 This vision is appropriate because it was developed in close partnership with the local communities reflecting the Government's Localism principles (see Para 25 of the draft NPPF). It responds to the locally identified headline issue which is the vulnerable local economy and recent housing development which has resulted in an imbalance between jobs and homes.

9.1.2 This vision also reflects the existing and emerging national policy objectives of reducing the need to travel (PPG13 para 3 & NPPF paras 83 & 150) . Therefore the Core Strategy, as far as possible, reflects a collective vision and seeks to address the key spatial problem in the area as well as implementing national policy.

Likelihood to be achieved

Policy SV1 seeks to achieve this strategy by;

- Boosting job creation and resisting inappropriate loss of employment land
- Limiting the level of new housing development
- Linking new housing to economic benefit

9.1.3 The Council has set out realistic objectives for the area and developed a clear and effective combination of policies to achieve this. The efficacy of the policy framework is elaborated below.

Economic development

9.2 Are there reasonable prospects of 1,000 net additional jobs? Is the Council setting aside or to review its Economic Strategy (CD4/E8) which seeks 2,500 new jobs (p52)? Would planning for more than 1,000 new jobs be justified and deliverable?

9.2.1 The Smart Growth report (CD4/E10) validates the aims of the Economic Strategy (CD4/E8) and the jobs target for the Somer Valley. The particular initiatives being

undertaken by the Council to help achieve this are set out in the Council's Economic Strategy (CD4/E8) & Topic Paper 2 (CD6/S3) paras 4.17 and 4.34- 4.38.

9.2.2 The Economic Strategy (CD4/E8) has been reviewed in light of the findings of the Smart Growth report. The review focussed on the short and medium term Action Plan and Outcomes and re-confirmed the document's strategic aims. (see Cabinet report 9.Nov.2011 CD4/E15 and CD4/E16). This led to specific initiatives and projects including;

- seeking through the redevelopment of former industrial land, to establish an Enterprise Hub in the area as a focus for small higher value added companies and individuals in the area.
- developing an Economic Development Action Plan for Radstock and Westfield. This will enable businesses to grow through strengthening links to support agencies that can provide match funding and advice and guidance to increase business productivity, encouraging growth and job creation.
- developing 'business to business' networks, strengthening local supply chains and providing a training and recruitment package able to meet employer needs as they experience growth.
- creating the 'Somerset Valley 100' programme a partnership between Midsomer Norton Town Council, local Chamber of Commerce and B&NES to develop a business network.
- taking forward the Masterplan Framework developed for Midsomer Norton town centre which identifies development opportunities with the potential to create up to 500 net new jobs.

9.2.3 There is land available for around 2,500 jobs to come forward in the area as identified in the Business Growth & Employment Land Study (CD4/E1). However as evidenced in the Smart Growth Report, it is unlikely that more than around 1,000 jobs will be created in the plan period due to the particular local economic circumstances (page 31 of CD4/E10). 1,000 jobs are, spread according to Oxford Economic Ltd expectations for job volumes in B&NES industries in 2026 under the Central Scenario, with Somerset Valley maintaining its 2006 share of B&NES industry (para 3.32 CD4/E10). However, the Council is not seeking to cap jobs growth to 1000 and a greater number of jobs would provide employment for the increasing number of people who currently have to out-commute.

9.3 Is the expected scale of change in relation to different types of business use justified by evidence (Policy SV1 3b)? In particular, how do the figures in SV1 relate to the projected oversupply predicted in the Business Growth & Employment Land Study (8.41-8.48 CD4/E1)?

- 9.3.1 The scale of change planned and Policy SV1 3b are informed and justified by the Smart Economic Growth (CD4/E10). In relation to the oversupply issue, please see para 9.2.3 above.
- 9.3.2 The Smart Growth report (CD4/E10) recommends stemming the loss of jobs in manufacturing, transport and communications in the area, and offset the expected loss of older industrial sites, by providing a new strategic employment location at Old Mills which can provide a long term supply of new employment land. This is also in recognition that historically vacancy rates for employment space in the Somer Valley have been low and that there is only limited land still available for development at the Bath Business Park Peasedown and at the Westfield Industrial Estate (para 8.47 of CD4/E1).
- 9.4 Is the protection of existing business use/employment land (Policy SV1 3c) consistent with national policy in relation to economic development? Is it likely to maximise the potential to create jobs in the area? Is it consistent with the expectation in the SHLAA of the loss of some former employment sites to housing (eg Alcan site, MSN 10)?**
- 9.4.1 Policy EC2.1h of PPS 4 states that Development Plans should safeguard land to facilitate a broad range of economic development but allocation should not be retained if there is no reasonable prospect of a site being used for the allocated economic use, and wider economic uses or alternative uses should be considered. Para 75 of the draft NPPF states that 'Planning policies should avoid the long term protection of employment land or floorspace, and applications for alternative uses of designated land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses.
- 9.4.2 Policy SV1(c) does not impose a blanket protection on employment land but seeks to safeguard the successful, modern, estates in business use. It allows for the redevelopment for mixed uses of the older, less suitable factory complexes such as the Alcan site (SHLAA MSN10) and Welton Bag (SHLAA MSN9). The retention of the successful modern industrial estates is justified by the need to resist further erosion of the areas' employment base and depletion of jobs. Already well over 50% of workers have leave the area to work (2001 census).

Housing

9.5 Is the planned increase of 500 dwellings above existing commitments consistent with the intended strategy? Would planning for substantially more dwellings result in increased out commuting from the area for work?

9.5.1 The Core Strategy allows about 500- 600 additional dwellings to come forward above existing commitments only because these are linked very specifically to identified benefits ie for the economy or the implementation of the town park.

9.5.2 The option of limiting new housing only to completing existing commitments was considered (Option 1 in the Spatial Option consultation (CD5/4.) However, the Sustainability Appraisals (CD4/A5) found that the chosen option (Option 2) performed better than Option 1 against many of the social and economic criteria (para 4.3.6).

9.5.3 Planning for higher levels of housing will inevitably lead to increase out commuting, because it will be unrealistic to expect job creation to step up in a similar fashion. This approach would therefore exacerbate the existing unsustainable patterns of development and be contrary to National Policy in PPG13 para 3 & draft NPPF paras 83 & 150.

9.6 Are the major commitments relied on for delivery likely to be achieved, bearing in mind the lack of development since being allocated in the Local Plan? What barriers to implementation remain to be overcome?

9.6.1 See Core Strategy Topic Paper 7 (CD6/S8) paras 37 – 50.

9.7 Are the constraints set out in SV1 4b justified/consistent with national policy?

9.7.1 Not pursuing the approach in Policy SV1 4b would be contrary to national policy in PPG13 para 3 & NPPF paras 83 & 150. Please see also para. 9.5.1 to 9.5.3 above.

9.8 Does the existing Housing Development Boundary exclude potentially sustainable sites, including previously developed land, potential mixed use employment housing sites, or sites included in the SHLAA as part of the housing supply? If so, is policy SV1 4b justified or should the Core Strategy signal the intention to review the Housing Development Boundary? This is proposed in minor change PC62 (introducing new paragraph 4.15a), but would this change then be consistent with SV1 4b?

9.8.1 As set out in proposed changes PC62, the HDB will be reviewed in accordance with the Core Strategy policies through the Placemaking plan. However any such change will need to be in accordance with the overall approach in the Core Strategy of limiting unsustainable patterns of development and mitigating climate change.

9.9 How would the requirement in SV1 3c for an employment benefit work in practice?

9.9.1 See paras 7.2 7.4 of BNES/2. The approach has been in the Paulton Printing factory scheme (SHLAA Pau1) and is being pursued at the Alcan site (SHLAA MSN10)

9.10 In my Further Preliminary Questions (ID/4) I sought clarification of the status of the proposed Town Park and what relationship it had to additional housing development. Council response in BNES/2 7.5-7.6. I remain unclear how delivery of a Town Park could be secured via specific housing developments as the requirements for Section 106 undertakings set out in the CIL Regulations would appear not to be met. Is policy SV1 4b justified in linking some additional housing developments to contributions to a Town Park?

9.10.1 The Town Park is a longstanding objective with strong support in the area and there is currently no such facility in this part of the District. SHLAA plans for the Town Park to come forward after 2016 which is after the anticipated adoption of the CIL (September 2013). The Council and the local community have acknowledged that it is more likely to be implemented if facilitated by new housing. The precise arrangements will be negotiated between the Council and land owners as part of a Placemaking Plan and planning application. The CIL regulation allows 'in-kind payments' where it will be more desirable for a charging authority to receive land instead of monies to satisfy a charge arising from the levy. This will be one of methods to be considered.

Infrastructure

9.11 What sites will the public funding MNR1.1 support? What does the figure of £7.7m represent? (eg total contribution from public funds or that expected from HCA alone)? What funding is currently secure/committed from HCA? What are the implications if HCA funding is substantially less than expected? Similarly, what is the likely scale and certainty of public funding for NMR1.3 (Old Mills II) and the implications if it is not forthcoming?

9.11.1 (IDP Ref:MNRI.1) The 'Single Conversation' Local Investment Plan, agreed between the HCA and the four UA's in the West of England in 2010 allocated £7.7m for preparation, planning and site specific infrastructure to release sites in Midsomer

Norton Town Centre and assist in bringing forward the land allocated for employment uses at Old Mills in the B&NES Local Plan.

9.11.2 The HCA has inherited a £36m Regional Investment Fund to facilitate the delivery of local priorities for housing and employment led regeneration. In addition the West of England LEP has been awarded funding under the government's Regional Growth Fund and Growing Places initiatives. It is proposed to use the monies to create a single £50m Revolving Infrastructure Fund to support priority investment locations and lever in HCA / European Regional Development Fund and other external funding.

9.11.3 A total of £7.7m has been allocated for unlocking opportunities in Midsomer Norton Town Centre as set out in Core Strategy Policy SV2.1(a)/(b) and (d) and SV2.3 (a)/(b) and (f) and for forward funding off-site highways and utilities works to service the employment land at Old Mills. £3m is available 2013 – 2016 with a further £4.7m in 2016- 2021. Release of the funds would be linked to a payback mechanism through Sec 106/CIL and New Home Bonus.

9.11.4 (IDP MNRI.3) HCA Rural Masterplanning Fund £30,000 was granted to prepare a Masterplan for Old Mills.

9.12 When will the bus route corridor improvements relevant to the Somer Valley be completed (MNR1.2)?

9.12.1 The Greater Bristol Bus Network major scheme improvements on the A367 Corridor 10, the A37 Corridor 3 and the A37 Corridor 6 are now largely completed. An official launch date to officially open these works is scheduled for March the 15th 2012.