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Matter 6 / 6350

**Bath and North East Somerset Placemaking Plan
Public Examination**

**Matter 6
A Prosperous Economy**

Submitted by

Sellwood Planning

on behalf of

Hallatrow Business Park Ltd

August 2016

Regulated by RICS

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1.0 **Introduction**

1.1 These responses to the Inspectors Questions on Matter 6 ‘A Prosperous Economy’ have been prepared on behalf of Hallatrow Business Park Ltd (HBPL). HBPL is the freeholder of the Hallatrow Business Park, located at the junction of the A39 and the A37 (see plan).

1.2 This submission solely focusses on Issue 1 of Matter 6 “*whether the development management policies will support economic growth, whilst working towards a low carbon economy as set out in the CS*”. A separate response is made to Matter 24 “Rural Areas – Economic Development”.

2.0 **(Q1) : “Do policies 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”?**

2.1 No comment.

3.0 **(Q2) : “Is the designation of existing industrial premises such as Hallatrow Business Park as ‘non strategic industrial premises’ rather than Strategic or Primary Industrial estates justified and consistent with national policy”?**

3.1 No, the Placemaking Plan approach to the Hallatrow Business Park is not justified by the evidence, it is not effective, it is not a positive approach to economic development and it is not consistent with national policy. As such, it fails all four of the soundness tests in paragraph 182 of the NPPF.

3.2 Whilst aware of the advice not to repeat the contents of the HBPL representation, it is relevant to reiterate the policy context for the Hallatrow site.

- 3.3 The site was identified as a ‘Core Business Area’ in Policy ET.3(a) of the 2007 Local Plan. Paragraph 2.35 refers to the Hallatrow Business Park as one of the significant employment sites in the Rural Area which “*often provide relatively low cost premises and make an important contribution to providing employment in rural areas*”.
- 3.4 The Preferred Options of the Placemaking Plan (November 2014) identified the Hallatrow Business Park as a Strategic Economic Development Site in the Rural Area. Paragraph 2.74 states that “*the Core Employment have been reviewed to assess whether they should be rolled forward as Strategic Employment Sites*”. The criteria were
- (1) The Site is genuinely strategic in the B&NES context
 - (2) whether there are reasonable prospects for churn or redevelopment within the site should current occupiers leave and
 - (3) Paragraph 22 of the NPPF, which advises that there must be a reasonable prospect of a site being used for the allocated employment use. This applies to land currently or last used for employment purposes and new greenfield allocations.
- 3.5 The pre submission Plan Policy ED.2A (Strategic and Other Primary Industrial Sites) is the successor to the Strategic Economic Development sites in the Preferred Options. Whilst this continues to identify Strategic Sites in Bath, Keynsham and the Somer Valley, none are identified in the Rural Areas. Thus, the Hallatrow Business Park is now relegated in status to ‘non strategic’ (Policy ED.2B).
- 3.6 The evidential basis of this change of stance between Preferred Options and pre submission stages appears to be solely based on the Lambert Smith Hampton (LSH) ‘Report on B&NES Industrial Market : November 2015 (Document : CD/PMP/DM18)’. It is, therefore, critical to an assessment of the soundness of the changes to the plan.
- 3.7 The report notes that

- total availability in the District is 1.6% or 1.1 years supply based on average take up rates (Summary page 2)
- just over half of recorded take up has been of Grade C space (Summary page 3)
- the District has four distinct industrial sub areas. These are Bath, Keynsham, Somer Valley and the rural area of Radstock
“Each sub region will develop strategic functions within the B&NES industrial market, which whilst not absolute in nature, do typify the opportunities they offer” (Summary page 4).

3.8 However, having recognised the existence of the rural area as one of the sub regions which ‘will develop a strategic function’, the table on pages four and five of the summary do not deal with the rural area at all.

3.9 The LSH Report undertook a detailed survey of 24 existing industrial sites in the four ‘sub regions’. One of these was the Hallatrow Business Park. Of these 24, four were in the rural area. These were

- Site 21 Cloud Hill
- Site 22 Temple Bridge Business Quarter
- Site 23 Hallatrow Business Park
- Site 24 Farringdon Fields.

3.10 Each of the twenty four sites was assessed by LSH in terms of the quality of the space (A, B or C grade), the suitability of the location for industrial use (score 3, 7 or 10) and an analysis of external property condition (score 3, 7 or 10). The following table sets out the LSH assessment of the eight selected Policy ED.2A sites along with the scores of the four sites in the rural area proposed to be excluded from Policy ED.2A status

Site No	Name	Quality	Suitability /Location	Combined	ED.2A Site
A (1)	Brassmill	B/C	10	B/C-10	Yes
B (14)	Ashmead Road	B/C	12	B/C-12	Yes
C (20)	Westfield	B/C	10	B/C-10	Yes
D (16)	Old Mills IE	B	14	B-14	Yes
E (18)	Mill Road	C	6	C-6	Yes
F (17)	Midsomer EP	B	14	B-14	Yes
G (19)	Haydon IE	C	6	C-6	Yes
L (15)	Bath BP	A	20	A-20	Yes
(24)	Farringdon Fields	C	14	C-14	No
(23)	Hallatrow BP	C	10	C-10	No
(21)	Cloud Hill	C	6	C-6	No
(22)	Temple Bridge	C	6	C-6	No

3.11 It is clear from the LSH scoring that both Farringdon Fields and the Hallatrow Business park score more highly than the selected ED.2A sites at Mill Road and the Heydon Industrial Estate. Two broad conclusions can be drawn from the above

- the LSH Report accepts that each of the four sub regions ‘will develop a strategic function’. As such, it is inconsistent not to identify any ED.2A sites in the rural area
- using the LSH scoring system, the Hallatrow Business Park and Farringdon Fields sites score more highly than the proposed ED.2A sites at Mill Road and the Haydon Industrial Estate.

3.12 On this basis, the selection of the ED.2A sites are not justified by the evidence base and the failure to identify any Strategic / Primary sites in the rural area runs contrary to the acknowledged role of the rural area and conflicts with the statement in the first paragraph of the LSH Executive Summary that

“The overarching aim (of the CS and Economic Strategy Review) is to encourage all areas of the district to achieve their potential in terms of economic growth and productivity, by creating employment opportunities and encouraging a more resilient and stable economy”.

3.13 To make Policy ED.2A consistent with the objectives of the Core Strategy and the NPPF as well as justified by the evidence base, both the Hallatrow Business Park and Farringdon Fields should become Policy ED.2A sites.

4.0 (Q3) : “Is the lesser protection offered to existing employment sites as non strategic premises justified having regard to the CS objective to support economic growth and the need for balanced communities”?

4.1 There is no, in principle, objection to categorising employment areas as strategic or non strategic based on their location, quality and suitability. However, the ED.2A sites need to be distributed across each of the LSH’s ‘sub regions’ to ensure that each area is given its due economic growth support and the opportunity to create balanced communities.

5.0 (Q4) : “In paragraph 494 is it clear to the decision maker that the reference to ‘these locations’ refers to the Strategic Industrial Estates and other Primary Industrial Estates”?


5.1 It would be clearer if paragraph 494 referred to ‘Strategic and Other Primary Industrial Estates’ rather than ‘these locations’.



Station House

103.9m

BANES Placemaking Plan
Land at the Hallatrow Business Park

 **ED.2A Site**

January 2016

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