

# **SOUTH WILTSHIRE CORE STRATEGY EXAMINATION**

**HS/BRIMBLE, LEA & PARTNERS (D STRATTON)/2920/1**

**MATTER 1. CORE POLICY 1. THE AMOUNT OF DEVELOPMENT**

## **HEARING STATEMENT**

**February 2010**

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**QUESTION 1.1                      WEIGHT TO BE GIVEN TO THE EMERGING RSS – NO EVIDENCE TO BE SUBMITTED**

**QUESTION 1.2                      AMOUNT OF DEVELOPMENT AND THE EMERGING RSS – NO EVIDENCE TO BE SUBMITTED**

**QUESTION 1.3                      EMPLOYMENT LAND**

These representations are made with respect to land adjacent to Dead Maid's Quarry, Mere as shown on drawing at [Appendix 1](#). They amplify those made at the publication stage of the Core Strategy as contained in [Appendix 2](#). Brimble, Lea & Partners' "sphere of influence" is primarily limited to the proposed Tisbury and Mere Community Areas. The Draft RSS requirement is for 13,900 jobs for the South Wiltshire area over the period to 2026. The recommendation that only 400 of these jobs be provided beyond the Salisbury Travel To Work Area (TTWA) is unrealistic in relation to the remainder of the district. This will put a severe limitation on the ability of businesses to expand, locate or relocate beyond the TTWA within the Plan period.

Irrespective of the "evidence" gathered which is primarily focused on those areas within the TTWA and appears to be based upon limited research/analysis of employment requirements beyond this area, there is specific evidence, as put forward in earlier representations of the need for additional employment land to be capable of being brought forward to provide the certainty necessary to enable businesses to expand, locate or relocate in the Mere area.

The Core Strategy proposes, despite Mere's identification as the main local service centre within a wider community area, that only the existing 3ha employment allocation (Saved from the Adopted Local Plan under policy E12) as shown in [Appendix 3](#) is required to meet the needs of this settlement and community over the period until 2026.

On the basis of the proposed distribution of growth (Core Policy 1) Mere itself is identified for significant growth of some 270 homes. Representations made elsewhere indicate why this figure should be closer to 500 homes particularly as the proposed neighbouring local service centre of Tisbury is less well suited to the quantum of additional housing proposed (440 new dwellings).

The reality is that the settlement of Mere is likely to grow significantly and that to accommodate the additional housing requirement existing employment land which is poorly located and utilises outdated buildings is likely to be redeveloped for housing.

The Local Planning Authority has recognised that the Hill Brush Company, who Brimble, Lea & Partners represent, is likely to need to relocate to more modern purpose-built premises in the near future.

Redevelopment of the existing Hill Brush site at Woodlands Road, Mere with poor road access through the centre of the settlement is likely to come forward early within the Plan period subject to viability issues being resolved. These viability issues are mainly a consequence of the current housing market and depressed land values and can be anticipated to improve during the life of the Plan leading to the relocation of this business.

The Hill Brush Company has indicated that it will require in the region of 3 hectares of land to provide a purpose-built new factory. Brimble, Lea & Partners has prepared detailed plans and costings in relation to the provision of this factory – see [Appendix 4](#) which demonstrates the Company's commitment to this move. Relocation is likely to take place subject to the viability issues referred to above being addressed.

The Hill Brush Company has been in discussion with the owner of the allocated employment land (TZZ). The plan in [Appendix 4](#) shows how their requirements could be met on the allocated site. TZZ acquired the land as an investment with the benefit of an outline planning permission for employment purposes (S/2006/0270 – see [Appendix 5](#) for a copy of the layout and permission) and this is in the process of being renewed. The outline permission shows how the site could be brought forward with a number of small employment units. TZZ has confirmed that it remains the intention to seek a Reserved Matters approval on the current allocation. The land may therefore be developed and not be available for Hill Brush or Dextra (see below) in the future.

On this basis the Hill Brush Company will need to relocate in the near future to land beyond the existing employment allocation on land owned by our client, Mr Stratton. Discussions have taken place to the point where the relocation of the Company to this location is likely subject to the resolution of the viability issues referred to above.

The LPA has recognised the likelihood of the business needing to relocate and wishes to ensure that the Hill Brush Company remains in Mere as it is an important local employer (see file note of meeting at [Appendix 6](#)). The relocation of the Company to land adjacent to Dead Maid's Quarry would necessitate in the region of an additional 3ha being provided beyond the Local Plan allocation in the near future.

Furthermore, Brimble, Lea & Partners have been in detailed discussion with Dextra Lighting Systems who currently employ 480 fulltime staff at their premises in Gillingham, a short distance from Mere. At present all of their raw materials are delivered via the A303 trunk road directly passing the Dead Maid's Quarry site en route. The Company wishes to have the ability to expand its business to Mere in order that they can provide a purpose-built state of the art production and distribution facility on land adjacent to Dead Maid's Quarry. The Company anticipate that they will require a 3ha site with the ability to expand in the future. The LPA has been involved in meetings regarding the relocation of this Company to this site. Letters at [Appendix 7](#) summarise the discussions held. While the LPA was broadly supportive of such a proposal, its main objection was to allowing a planning permission at this stage (based on existing Local Plan Policies) prior to the initial allocation being brought forward.

It has already been demonstrated that Mr Tizzard is seeking approval to provide a number of smaller units in the existing allocation to reflect the demand and interest that he has received from local small businesses.

Taken overall, there is a demonstrable need for additional employment land beyond the Local Plan allocation to be able to be developed **without delay during the Plan period**.

PPS4 (published 29.12.2009) at EC1.1(a) makes it clear that Regional Planning bodies and Local Planning Authorities (LPA's) should work together in preparing local economic assessments, to prepare and maintain a robust evidence base to understand both the **existing business needs and likely changes in the market** (my emphasis).

At para EC1.3 PPS4 includes the advice that *At a local level, the evidence base should: ... (b) assess the detailed need for land or floor space for economic development, including for all main town centre uses over the Plan period.*

With respect to Plan making policies at para EC2.1(b) it is made clear that LPA's should ensure that their Development Plan: *Supports existing business sectors, taking account of whether they are expanding or contracting and, where possible, identifies and plans for new or emerging sectors likely to locate in the area, such of those producing low carbon goods or services. However, policies should be flexible enough to accommodate sectors not anticipated in the Plan and allow a quick response to change in economic circumstances.*

At sub-section (c) it advises that LPA's should ensure that the Development Plan *positively plans for the location, promotion and expansion of clusters or networks of knowledge, driven or high*

*technology industries and at (d) seeks to make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use and, subject to the specific policy requirements of this PPS for Town Centres, reflects the different location requirements of businesses, such as the size of site required, site quality, access and proximity to markets as well as the **locally available workforce** (my emphasis).*

At (e), LPA's should ensure that their Development Plan *Identifies, protects and promotes key distribution networks, and **locates or co-locates developments which generate substantial transport movements in locations that are accessible** (including by rail and water transport where feasible), avoiding congestion and preserving local amenities as far as possible.*

The existing Hill Brush factory is located in an extremely inaccessible location on the southern side of Mere with all vehicle movements having to make use of a narrow (single lane priority in parts) road: Pettridge Lane. Its vehicles have to negotiate the historic streets running through the centre of the settlement. Relocation to an edge of settlement location would be ideal.

Finally, PPS4 at paragraph EC6.2 clarifies that LPA's should: *(b) identify local service centres (which might be a country town, a single large village or a group of villages) and locate most new development in or on the edge of existing settlements where employment, housing (including affordable housing), services and other facilities can be provided close together.*

The functional role of Mere as a proposed local service centre is not queried. But if it is to fulfil this role and the proposed level of housing growth it is vital that sufficient employment land is identified not solely to allow for the relocation of existing businesses but also to enable small business units to be brought forward as proposed and the relocation of a major local employer (with nearby associated workforce) to provide its new factory in this ideal location.

In recent communication with the Team Leader of the Spatial Planning Unit, he has clarified that the Council is committed to assessing further employment land requirements in Mere at para 10.12 of the Core Strategy. While the Council thinks it unlikely that there would be common ground with respect to allocating a further 10.5ha employment land in Mere beyond the existing allocation (as proposed), at this stage, he does not rule out the possibility of further allocations in the future under the aforementioned review. He also states *We are committed to facilitating economic development in a sustainable manner to support resilient communities* (see copy of e-mail at [Appendix 8](#)).

However, this does not address the main concern of delay and uncertainty.

It is noted in PPS12 (04.06.2008) that one of the requirements of a Core Strategy should be (see para 4.5) that *It is essential that the Core Strategy makes clear spatial choices about where development should go in broad terms. This strong direction will mean that the work involved in the preparation of any subsequent DPDs is reduced. It also means that decisions on planning applications can be given a clear steer immediately.*

While it is acknowledged that the Spatial Planning Unit has been broadly supportive in principle during discussions held with it to date, certainty is required in order that all of the employment that would be generated from the above proposals is capable of being brought forward as soon as required without any further uncertainty or delay.

Despite this, it is considered that the Core Strategy submission document is not sound for the reasons set out above.

It is considered that policy CS1 is not sound with respect to the proposed amount/distribution of employment on the basis that it does not appear to be founded on a robust or credible evidence base (outdated evidence and main concentration on Salisbury TTWA) and that it does not provide the most appropriate strategy when measured against reasonable alternatives i.e. identifying sufficient land adjacent to Dead Maid's Quarry to allow for the employment needs of Mere up until 2026. In the circumstances, it is considered that the Core Strategy in this respect is not justified.

Similarly, it is ineffective being inflexible.

Furthermore, it is not consistent with national policy including advice in recently published PPS4 and PPS12 for the reasons set out above.

### **Proposed Changes**

It is suggested that the wording of Core Policy 1 should be amended to increase the amount of employment land required at Mere to 13.5ha recognising that outside the Salisbury TTWA the vast majority of new jobs are likely to be focused in Mere. The 1.4ha allocation in Tisbury is limited to some 3,800m<sup>2</sup> of only B1 use because of the limitations of very poor access and the allocation being part of a mixed use with nearby houses.

Paragraph 10.10 *The Scale and Distribution of Growth* should be amended to refer to 13.5ha of employment land (including the Saved Local Plan allocation). Para 10.12 should also be revised to make specific reference to the ability for existing large local employers to relocate to the site (Hill Brush and Dextra Lighting Systems). There would be no need for a Site Specific Allocations

Development Plan Document if the whole of the site as put forward was recognised as being ideal for the relocation of these businesses and the provision of other smaller employment units. The release of the land can be phased following the completion of the existing allocation which is anticipated to be brought forward shortly.

## **APPENDICES**

Appendix 1	Plan of site subject to representations
Appendix 2	Representations made at publication stage
Appendix 3	Existing Employment Allocation (E12) from Adopted Local Plan
Appendix 4	Layout plan and elevations for proposed relocation of Hill Brush Company
Appendix 5	Copy of Planning Permission S/2006/0270
Appendix 6	File Note of Meeting with LPA (Hill Brush)
Appendix 7	Letters summarising discussions
Appendix 8	E-mail from Spatial Planning Unit Team Leader