

South Somerset District Council: Local Plan 2006 – 2028

Resumed Independent Examination

South Somerset District Council Hearing Statement

**Issue 5: Delivering New Employment Land
(PMM 4 & PMM 6)**

May 2014

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Question 5.1: Are the revised/additional figures for each settlement listed in Table 1: Employment Land Justifications and set out in Policy SS3, based on sound evidence? Are the figures based on a sufficiently consistent approach to identifying employment land for all the named settlements in the policy? Will they lead to an over-provision of employment land in some settlements?

- 5.1.1 The Inspector's Preliminary Findings Letter (Paragraphs 56-59) raised a significant issue of concern regarding the lack of evidence to support the distribution of employment land in the Primary Market Town of Wincanton, the Local Market Towns and each of the six Rural Centres. The Council consequently reviewed its evidence base, clarifying its methodology and creating greater specificity in the appointment of employment land to those settlements.
- 5.1.2 The strategic approach to identifying employment land remains unchanged and is set out in the Employment Topic Paper [CD 11]. To summarise, the employment land identified in Policy SS3 is based on a quantitative approach which translates jobs into land, rationalised with a qualitative assessment of need by settlement. The employment land identified for the Yeovil Sustainable Urban Extensions and the Rural Settlements is reflective of this direct calculation, where the land identified is derived from the job projections over the plan period. This approach is in line with Paragraph 34 of the National Planning Policy Guidance. The other settlements in Policy SS3 use this quantitative figure as a starting point, but additional evidence has been used to provide more specific figures.
- 5.1.3 Table 1 for Policy SS3 (as revised through PMM4) sets out the settlement-by-settlement justification for the revised employment figures.
- 5.1.4 As noted above, the figures for Yeovil Town (separate from the Sustainable Urban Extensions) has not changed as a result of the Main Modifications. The rationale is the same as was set out in the Employment Topic Paper. This is also true for employment land requirements for Crewkerne and Ilminster.
- 5.1.5 The revision to the employment land figure for Chard, is not a methodological change, but is merely to clarify that the 13 hectares is a confirmation of the strategic employment allocation required to deliver employment growth in the town to support wider regeneration aims. This is confirmed in the supporting text within Table 1, and is also amended through the modifications shown in CD3b, CD3c.
- 5.1.6 In reference to the Inspector's issue of concern for Wincanton, the Local Market Towns and Rural Centres, the Council has prepared additional analysis, this is set out in detail in Employment Policy SS3: Proposed Main Modifications Background and Further Evidence Base [CD167].
- 5.1.7 The Council has sought confirmation that the approach was justified, and takes comfort from correspondence with the Inspector where it was confirmed that the approach was appropriate [see CD 168 and CD169].
- 5.1.8 To summarise, evidence of demand was collected from four separate sources:
- historical land completions;
 - employment land calculated from projected jobs growth;
 - land requirements derived from a survey of local businesses; and

- land requirements derived from a survey of local developers and commercial agents.

This evidence, taken with the Council's overall objective to bring about a high performing economy led to specific figures being identified for employment land in each settlement. The decision was taken to opt for the highest figure identified which reflects the Council's enabling approach towards economic development. The employment land assigned to each settlement is fully set out, and evidence presented in the Employment Policy SS3: Proposed Main Modifications Background and Further Evidence Base [CD167].

- 5.1.9 In summary, the Council believes that the revised figures for each settlement listed in Table 1 are based on sound evidence and a sufficiently consistent approach to identifying employment land.
- 5.1.10 The Council do not believe that the revised figures will lead to an over provision of employment land in any of the settlements as they are based on evidenced need and demand. The identified employment requirements give a clear indication to the market that SSDC is pro-growth and is seeking to maximise its economic potential. The Council advocates that the Directions of Growth / Strategic Employment Sites, along with the permissive approach prior to the Site Allocations DPD provide the certainty for the market to deliver on the identified employment requirements in each settlement.

Question 5.2: Is the Council's permissive approach to the consideration of employment land proposals in Yeovil (via the SUEs), the 'directions of growth' at the market towns and the Rural Centres justified, effective and appropriate in the circumstances?

- 5.2.1 It is considered that PMM6 [CD 159] is justified because it adds clarity and certainty to the emerging Local Plan in accordance with paragraphs 17, 154 and 157 of the NPPF. By providing an interim approach to development proposals within the Directions of Growth at Yeovil (via the SUEs), Market Towns and adjacent to Rural Centres prior to the adoption of the Site Allocations DPD it is effective and appropriate in the circumstances.
- 5.2.2 Paragraph 157 of the NPPF advises that local plans should allocate sites and provide detail on the form, scale and quantum of development. It is the Council's intention to produce a Site Allocations DPD as a matter of urgency and to provide the resources to fast track the production of this document in line with the timescales emanating from the conclusion of the Examination process. The Local Development Scheme 2013 – 2016 [CD 27] identifies that the document will be adopted in 2015.
- 5.2.3 The Sustainability Appraisal Addendum Report (March 2014) [CD 161 d. iii.] concludes that PMM6 does not significantly affect the findings of the Local Plan SA Report (June 2012). This is because PMM6 [CD 159] does not change the substance of the policy, but is intended to clarify the delivery of housing land ahead of allocating sites. The need to consider an appropriate scale of growth, the NPPF and other Local Plan policies, means that appropriate policy measures remain in place to ensure the impacts of new housing development are fully considered and addressed, particularly regarding the overall scale of growth. The modification could potentially deliver more housing land in the short term, but significant positive effects are already predicted for these objectives.

- 5.2.4 PMM6 [CD159] is considered to be effective, appropriate and positive as it provides decision makers with the certainty and flexibility to bring forward development proposals within the Directions of Growth at Yeovil (via the SUEs), Market Towns and adjacent to Rural Centres. This would be subject to consideration against the NPPF, Local Plan Policy SD1, the scale of growth and settlement hierarchy for South Somerset and other Local Plan Development Management Policies. It provides a pragmatic approach to positively enable new employment land development to come forward in the intervening period before such time as the Site Allocations DPD is adopted.
- 5.2.5 Additionally, this permissive approach taken by the Council was accepted by the Inspector as detailed in his letter 25 November 2013 [CD 169].