

Position Statement for Topic 6 Employment Hearing

Consultation North West Leicestershire Local Plan (Responder ref 84)

Introduction

This Position Statement is submitted by Brackley Property Developments Ltd on behalf of the Rosamond Pattinson 1991 Declaration of Trust. With regard to the Employment (Topic area 6) and continues the representations made regarding Policy EC2 and supporting text.

The submitted representations suggested that, in the absence of any sites in the main town Coalville urban area, the proposed 16 Ha employment allocation at Ashby should be split between Ashby and the other key service centre Castle Donington, in order to provide balance and flexibility, rather than concentrating the allocation on just one site. This would offer choice, meet occupiers needs and provide the best opportunity for delivery and job creation for both key service centres rather than leaving one with and one without suitable employment land.

Council Response

The Council's response to our representation was to make no changes to the Consultation draft – with reasoning twofold:

Firstly defending the delivery of the Money Hill allocation:

1. 'It is not clear why the (Money Hill, Ashby) employment development would be considered to be ineffective in terms of deliverability. The plan has been subject to viability testing... This concluded that the development was viable' and 'It is considered that the proposed allocation at Money Hill is appropriate, and of a suitable scale to be deliverable.'

Secondly, arguing that there is plentiful supply of undeveloped employment land already at Castle Donington:

2. 'There are a range of committed employment sites around the District. This includes about 55 hectares of land in the Castle Donington / East Midlands Airport area which is just under 50% of all commitments. In addition, the Strategic Rail Freight Interchange provides additional employment land in this locality. It is considered that there is no need to provide additional land in Castle Donington.'

Responder reply

1. Money Hill, Ashby allocation

A single, large allocation at any location places unnecessary uncertainty of delivery due to ‘placing all eggs in one basket’. Given that Background Paper 6 assumes 45 Hectares of employment land will have been lost to alternative uses, it is entirely logical to minimise that risk going forward by spreading the allocation across two sites in two separate towns with different market conditions – and to omit the town with the best track record of employment land delivery is not sound.

One specific concern with the scale of development proposed for this single site is the likely increase in delivery time across the plan period compared to balancing the 16Ha allocation across separate sites. Reducing the scale of development to 10 Hectares would leave a large enough allocation yet allow a second site to be delivered simultaneously elsewhere.

A key benefit of splitting the allocation is to provide choice for occupiers – even if the Money Hill site were viable what certainty is there that all occupier demand would be satisfied in Ashby? Castle Donington is the better strategically located of the two key service centres being nearer the Airport, and we are aware of specific occupier interest in Castle Donington as opposed to Ashby.

A further concern is that the small to medium warehouse market will not be addressed within a large 16Ha allocation – where, despite the best Policy intentions of EC2 in requiring such, the temptation for developers will be to package up much larger warehouse, office and industrial sites and seek to sell larger plots than the local and regional occupier market can afford.

A second, smaller allocation provides greater certainty that all sectors of the employment market will be catered for, thus ensuring the Plan is effective, positively prepared and justified.

The Plan also needs to be consistent with national policy- and as such the following review of national policy on Local Plans approach to employment land is relevant:

Para 7 of the Framework defines the Economic dimension of sustainable development thus:
...’Ensuring that sufficient land of the right type is available in the right places and at the right time to support growth...’

The proposed single employment allocation at Money Hill deprives Castle Donington (the right location – a key service centre with a track record of employment delivery) of the right type of development (small to medium sized B8 uses to provide for known local and regional occupier demand) at the right time (land at Castle Donington is available early in the Plan period).

Para 9 states that *‘pursuing sustainable development involves... making it easier for jobs to be created’*. One way in which the Plan can do this is to respond to the occupier demand for smaller warehouse plots at Castle Donington rather than focusing entirely on Ashby.

Para 14 requires Plans to ‘*positively seek opportunities to meet the development needs of their area*’. NWDC’s rebuttal of our suggested omission site fails to meet the needs of occupiers requiring small to medium sized warehouse sites in the Castle Donington area.

Para 14 requires Local Plans to provide sufficient flexibility to adapt to rapid change. Placing the entire employment allocation for B1, B2 and B8 in a single location fails to provide choice and flexibility should that site not be able to come forward, or indeed be developed for employment uses other than small to medium warehouses.

Para 17 establishes core planning principles and states that ‘*...Plans should take account of market signals... and set out a clear strategy for allocating sufficient land which is suitable for development in their area taking into account of the needs of business communities*’.

The current single allocation at Ashby fails to take account of the need for a balance of provision across both key service centres in the district, as evidenced by the lack of small to medium warehouse sites in Castle Donington. Occupiers have clear interest in such sites, and there is a real risk that the 16Ha allocation at Money Hill will fail to provide for these needs.

Paragraphs 21, 157 and 160 place further requirements on Plans to support business sectors and meet the anticipated needs over the plan period.

Balancing the employment allocation across the two key service sectors (albeit with the majority 10Ha allocation remaining at Money Hill, with a smaller 6Ha allocation at Castle Donington) is necessary to enable the Plan to be effective, justified, positively prepared and consistent with national policy.

2. Existing provision at Castle Donington

The Council point out that as of November 2015 there were 55 hectares of employment land remaining undeveloped. These are all on sites where development has commenced, thus demonstrating that Castle Donington has a track record of delivery of employment land – none of these sites have been lost to alternative uses – but delivery of large allocations takes time.

The Council are rightly concerned with the loss of such employment land, so have designated the committed employment sites in Castle Donington as Primary Employment Areas, where changes of use to non-employment uses will be discouraged.

We have asked local commercial agents Fisher Hargreaves Proctor to update this situation, which seems to be markedly different when the true availability of land is considered, as follows:

- *Willow Farm Business Park* – Into final phase – only one plot left:
 - Unit 2b – 2.2 acre Warehouse site available for sale / to let with full planning permission at 41,500 sqft. This final plot has a compromised and hidden access with a small service yard that has resulted in low occupier interest.

- *Land adjacent Trent Lane Industrial Estate – c. 17 acres Gordon Ellis land*
 - This land is not being marketed by the landowner as they are reserving it for their own future occupational requirements – either for employment or alternative uses.
- *East Midlands Distribution Centre – over 50% complete (1m sqft remaining) quoting plot sizes 30,000 sqft to 548,000 sqft (Plots 5A and 6B now taken and under construction).*
 - Plots 1, 3A, 3B, and 5B currently available – although planning applications have been submitted for 500,000 sqft + warehouse units on plots 1 and 3 therefore not available to the small, local and regional occupier market.
 - Plot 4 – 7.63Ha site - The developer is only seeking large design and build units which will not cater for the local and regional market.
- *Pegasus Business Park at East Midlands Airport*
 - Building 96 - Semi-detached 22,000 sqft warehouse to let
The preference here is for airport – related uses but the reason why this would not suit our occupier interest is the physical constraints of the unit itself
- *East Midlands Gateway (Strategic Rail Freight Interchange)*
 - Roxhill Developments have planning permission for 6,000,000+sqft and have commenced construction of units – being marketed again at the ‘up to 1.5m sqft’ unit size. Smaller units here are unlikely to be available for 3,000 sqft – 75,000 sqft warehouses.

Thus, there are no current available and suitable opportunities for small to medium warehousing for the local and regional occupier market in the Castle Donington area.

There is also undeveloped employment land at Ashby de la Zouch which, although again not available for smaller units, demonstrates that it is not just Castle Donington that has existing undeveloped employment land seemingly available:

- *Former disposal point at Lount*
 - This has previously been marketed for large scale employment units (although this land is now affected by the HS route thereby making it incapable of development)
- *Ashby Business Park, Nottingham Rd South*
 - This is being marketed for a large single unit of circa 220,000 sq.ft.

As for existing employment sites stated in the Consultation draft Local Plan as yet to be developed under Policy Ec1, as stated in our initial submission none of these sites are suitable for medium sized warehouses serving the local and regional occupier market:

- EC1a remains very expensive – with 400,000 sq ft sheds sought
- EC1b is land-locked
- EC1c is proposed for a waste reclamation site
- EC1d is now under construction
- EC1e is also now under construction

The above serves to paint a very different picture of the current supply of such land for employment development, and indeed supports our contention that Castle Donington's very good track record of delivery should be recognised as an indicator that the best opportunity for job creation exists by balancing the additional employment land between Ashby and Castle Donington.

While it is not for debate as to whether better sites than the Money Hill proposal exist on their individual merits, the Council are duty bound to plan development in the way it is most likely to be delivered, and allocating further employment land at Castle Donington will help ensure the Plan is Sound and presents a balanced response to demands.