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Submissions on behalf of the Aucott Group

LP064

Matter 10 Employment.

Theme 2 – The economy, the town centre and retail, office and cultural development (Policies EC1-7)

10. Employment

10.1 Are the expectations in the Plan for employment growth (including 32 ha of new employment land) soundly based on a coherent framework? Are there any changes in the Plan needed in response to the Government's Growth Agenda?

10.2 The Plan also identifies a significant shortfall (14 ha) of employment land which needs to be identified in neighbouring authorities and then implemented within the plan period. Is this figure justified, and what steps has the Council taken to secure the implementation of this land for employment purposes?

10.3 Are the specific employment sites identified in policy EC6 justified and deliverable within the plan period?

The Land South of the A5 EMP1

This site has been a proposed allocation in the development plan for a considerable period and has also been the subject of outline planning permission granted in 2006. A combination of circumstances has meant that the land has not yet come forward for development as a result of the 2006 outline planning permission. This related principally to the requirement to fund improvements to the road infrastructure at both the Jolly Sailor and Sainsbury roundabouts. By 2011 these road improvements had taken place financed from nearby retail developments at the John Lewis site and in Ventura Park road which were permissions both granted on appeal in 2006

An outline application for employment B1 B2 and B8 was lodged with the LPA on the site in June 2011. Notwithstanding the previous Planning Permission there were protracted discussions with the Highways Agency regarding the Junction off the A5 due to a change in standards. The owners have agreed with the HWA how these issues can be overcome and the current planning application ref 0284/2011 is effectively now signed off by the HA.

Due to the location of the site within a defended flood zone there has also been extensive modelling to demonstrate that the site can be satisfactorily developed and this proposal has now been signed off by the Environment Agency. On this basis the current application is expected to go to a July Planning committee with a resolution to permit the development proposed.

The development proposed in the current submission comprises B1 and B2 and B8 development in accordance with the same principals as the previous planning permission from 2006 but not in compliance with Policy E 1 and E 7 as currently drafted.

Appended to this submission are the following documents

- The July 2006 outline Planning consent
- The current application layout plan
- The HWA letter
- The EA letter
- Aerial Photo
- Committee report for BMW

Based on the latest evidence as part of the current application it is anticipated that an outline consent for the site will be granted in summer 2015.

10.4 Is the protection of strategic employment areas in policy EC7 in accordance with national policy, such as paragraph 22 of the Framework? For example, what would be the parameters of an 'independent assessment', in relation to attractiveness to the market, and over what period of time?

National Planning Policy at para 22 of the NPPF makes it clear that land allocations should be flexible and responsive to changing situations. Our objections to the plan relate to the need for the plan to adopt a broader understanding of what constitutes employment and in what sectors jobs are created which is the ultimate aim to secure employment.

The plan as drafted does not permit for B1a uses on the site despite a previous planning approval. Nor does it allow for other employment generating uses suitable in commercial areas. Our perspective is that the allocation should be a commercial allocation rather than a prescribed B type allocation and this would be appropriate in land use terms with the housing to the south and the retail/ commercial development north of the A5.

There is currently interest in locating on the site from car dealerships and retail warehouses, public houses and allied road services, all of which are significant generators of employment. This type of development would be in accordance with para 22 of the NPPF in so much as they are responding to market signals, supporting local employment and stimulating the economy.

The Employment land review report of December 2013 Document C2 notes the economic profile of the Borough and sets out at para 3.31 that retail trade, transport, wholesaling and construction are strongly represented in absolute and relative terms. It is noted that Tamworth offers some comparative advantage in these sectors and that this is expected to drive growth in the future as indicated in Figure 3.9. The report notes at 11.26

On appropriate sites and where a clear need is demonstrated, marginal areas of the Borough may require allowing a limited amount of higher value 'enabling development' to help fund infrastructure and support provision of speculative employment premises. Mixed-use development may provide one way of enabling the private sector to provide such enabling investment. As well as seeking to retain employment land in any redevelopments of redundant employment sites (where appropriate, depending upon the nature of the employment site itself), there may also be some scope for developers to provide small business units in mainly residential schemes, perhaps secured through s.106 agreements and with delivery linked to the timing of other development. The precise location and layout of such space should be carefully assessed to ensure that it will be attractive to the market; for example, B1a office space and Sui Generis uses such as car showrooms should typically be located at the front of sites to ensure market visibility.

The land south of the A5 is a site where some higher value enabling development would assist in the delivery of the site and assist in the support of the costs of the new junction improvements to access the site from the A5 itself. The Policy E7 as drafted is prohibitive of this approach and on that basis is not in conformity with National Planning Guidance and so should be modified to provide a more flexible framework within which this site can come forward for development.

This site is the largest site in the allocations by a significant degree and remains the single large employment site proposed in the Plan. The other sites being small scale in comparison.

Table 4.3 of the Plan notes that the site would form an extension to the Bitterscote strategic employment area which lies to the north of the A 5. In fact the site lies south of the retail area including the John Lewis store and car park, the Offices within the CIN building, the newly approved and constructed BMW car dealership and the Simpson building supplies. It therefore adjoins a mixed retail and commercial zone, rather than a recognisable pure employment area. It is noted that the BMW dealership has been approved on site Employment site Ref EMP2. So it is now assumed that this allocation will be amended or deleted.

On that basis there should be a more positive policy approach to the development of this site to ensure that it will deliver employment in this central location based on a more extensive range of uses. The policy as drafted does not give any certainty to what the details of the test will be to allow for non B uses and if this involves a marketing exercise. The test also applies a sequential approach which is not supported by the NPPF. This type of Policy approach is sending out a negative signal to potential developers and investors, who rather than go through a series of undefined tests will simply locate elsewhere.

10.5 Does the Plan address the need for a housing/employment balance? What is the current level of self-containment, and are there plans to increase it? Is there a balance between housing provision and maintaining an adequate supply of employment land?

