

Edenfield Community Neighbourhood Forum

Rossendale Local Plan Examination Submission

29th August 2019.

Hope View Market Street Edenfield



Edenfield

Rossendale Local Plan Examination

Hearing Statement

Matter 5:

Employment Need and Supply.

Alan G. Ashworth and Richard W. Lester.

Edenfield

Contents:

Matter 5 – Employment need and supply

Issue - Does the Plan set out a positively prepared strategy for the delivery of employment development and jobs, which is justified, effective and consistent with national policy?

[Policies EMP1 – EMP5]

Questions, Responses and Comments.

Suggested Revisions.

Alan G. Ashworth and Richard W. Lester.

Questions, Responses and Comments.

Employment provision

1) **Question a:** Is the identified Functional Economic Market Area of Rossendale justified?

Response: Rossendale Borough Council (RBC) should respond.

2) **Question b** Is the identified objectively assessed need (OAN) of 22-32 hectares of employment land over the period 2014 - 2034, as set out in the Employment Land Review, soundly based? In particular:

Question b i. Is the allowance for employment land/premises which may be lost to non-employment use (some 26 hectares) justified and supported by the evidence? To what degree could the allowance be affected by an upturn in the local economy?

Response: Land Loss Allowances. The total figure for Land losses over the ten-year period from 2008/9 to 2017/8 was 7.576ha. [Source: document EB017 Lichfields' Employment Land Review Final Report 17th February 2017 (Lichfields' ELR) Table 5.2 page 37 for 2008/9-2009/10 and the Annual/Authority Monitoring Reports (AMR's) from 2010/11 to 2017/18.) The figures cover the losses but there are also gains during this period which have been disregarded. The gains are stated in the AMRs, they equate to 1.41ha since 2010/11 bringing the net land losses down to 6.166ha over the past ten-years. (See Appendix ENCF - ELR 5.) For comparison and in support of this figure it should be noted in Appendix ECNF – ELR 5 that the Gross Employment Completions in Rossendale average 0.39ha per annum over the last ten years, some 0.227ha less than the perceived land losses.

Lichfields' ELR, Page 77, Section 9.67, takes the twenty year period at 1.35ha per year giving a total of 27ha for land losses.

If the average 10-year annual land loss allowance figure from Appendix ECNF – ELR 5 is used for the Plan period (2019-2034) then the total allowance required would be 9.25ha, not 27ha.

3) **Comment:** The above analysis highlights omissions and more appropriate methodologies for calculating land loss allowance. The analysis undertaken by Lichfields' ELR should therefore be revisited, to ensure accuracy and to respond to the observations above. The land requirement from an economic uplift would be relatively minimal; a 10% growth in employment numbers only increases the land requirement by approximately 0.6ha.

4) **Additional comments:** Employment Land that is re-used for retail parks is included within the Employment Land Loss classification, good examples being the Morrison Supermarket in Bacup and the extensive developments at New Hall Hey. Our personal view is that these should not be considered as Land losses; the retail parks in Rossendale follow national shopping trends, reflect nationwide changes in employment and have created significant levels of new/replacement employment.

5) **Overall Comments on Policies EMP 3, 4 & 5:** Assuming these policies are introduced despite the declining trend* in recent years of Employment land being used for other purposes, it is likely that in the future there will be either no need or a much reduced need for a Land Loss Allowance, which is the major provision in the employment land calculations. On this basis the requirement for Employment land would be reduced to a figure close to 1.47ha for the entire fifteen years of the Plan. (See ECNF – ELR 6.)

*The ten year average loss rate has reduced from 1.48ha per annum in 2005/6-2014/5 to 0.76ha in 2008/9-2017/8.

- 6) **Question: b ii) Flexibility Buffer:** Is it reasonable to apply a flexibility buffer (1.99 ha), in the context that an uplift above OAN is also applied in the Plan (see below)?

Response: To calculate the final figure a safety margin of two years has been added but the figure used for this was the 0.99ha from 2005/6 to 2015/16 completions annual average. Note the updated Completions figure is 0.39ha per annum and therefore a more accurate Safety Margin figure would be 0.78ha for two years. **(See Lichfields' ELR , Page 76 Section 9.60 Table 9.15 & Appendix ECNF - ELR 5 for Completions data.)**

- 7) **Comment:** It is a safe to include a Flexibility Buffer figure; however the figure used needs to be accurate. This should be revisited and corrected.

- 8) **Question: b iii) Employment Density:** Are the employment density and plot coverage assumptions used to translate the jobs estimates into land requirements justified and robustly based?

Response: The latest Employment projection in the Employment Land Topic Paper highlights a further reduction in manufacturing jobs of 119. Updated to reflect this change, the Floorspace requirement is reduced from 5,432sqm to 2,755sqm. When this is subjected to the Plot Ratio calculations, the gross land requirement figure is reduced from 1.36ha to 0.69ha. **(See Appendix ECNF - ELR 3 Employment projection figures and Appendix ECNF – ELR 4 Space calculation details.)**

- 9) **Comment:** The assumptions become questionable for the manufacturing area when a contraction is forecast. There is no clear justification for imposing a ratio of only 50% of the individual employees' space being lost. Additionally, the Plot Ratio calculations are questionable when the same ratio is used for Offices, Manufacturing and Warehousing. The plot ratio figure should be increased to 50 or 60% when being applied to the B8 sites

- 10) **Question c.) Paragraph 116** in the Plan confirms that the Council has identified an employment land requirement of 27 hectares. Is this figure justified and supported by robust evidence? If the employment requirement is based on labour supply estimates, are there implications arising from the different Plan periods for the housing and employment requirements in the Plan (2019-34 v. 2014-34)?

Response: The Employment Land requirement calculation consists of four components, increased space due to employment growth, land loss allowance, a safety margin (flexibility buffer) and the Plan period.

The first calculation for employment growth is based on the employment categories involved which for RBC with a projected loss in manufacturing and the trend to service-orientated businesses means the space requirements are relatively small and insignificant. Our calculations differ from RBC / Lichfields and our projection is for 0.69ha over the 15-year plan period.

The second component is the land loss allowance (paragraph 2 above) and our figure again differs from RBC / Lichfields, being 0.617ha per annum rather than 1.35ha per annum. Over the fifteen year period this equates to 9.25ha.

The third component is the safety margin (flexibility buffer)-paragraph 6 above-with our figure being 0.78ha as opposed to their 1.99ha.

The final component is the plan period which should be fifteen years (2019-2034) not the twenty years (2014-2034) used by Lichfields. **(See Appendices ECNF – ELR 1-7.)**

The difference between a fifteen or twenty year plan period is only 3.09ha using our calculations and this would be reduced if the full effect of the population predictions in the SHMA 2019 were taken into consideration.

- 11) **Comment:** The above analysis highlights omissions and more appropriate methodologies for calculating the Employment Land requirement. The analysis in Lichfields' ELR should therefore be revisited, to ensure accuracy and to respond to the observations above. Our total figure is 10.72ha for the Plan period 2019-2034 as opposed to the RBC / Lichfield figure of 27ha for 2014-2034.

In our calculations in **ECNF- ELR 3, 4, 5 & 6** we use the latest employment figures from RBC's Employment Land Topic Paper- Table 1 Section 3.1.4.

The above analysis considers the 27ha figure to be inaccurate and therefore unjustified; the evidence for requiring this amount of land is unsound. Additionally, the Employment Land requirement period should be in line with the plan period. However, even if the period were extended to twenty years the requirement would only be 13.8ha.

- 12) **Question d.** Are there any implications for employment OAN and employment land requirements arising from the updated employment forecasts in the SHMA 2019? (also see Matter 3cii)

Response: The implications from the updated figures in SHMA 2019 are marginal; there will be a small reduction in the requirement of Employment Land reflecting the changes in the working age numbers. **(See ECNF – ELR 4).** In terms of Matter 3cii it is likely the Housing Numbers requirement will be reduced with the negative growth particularly in the two age groupings of 20-40 and 40-60.

- 13) **Question e.** The Council is requested to provide information on all potential sources of employment land supply between 2014 -2034, including completions between 2014 - 2019, outstanding commitments, surplus land within existing employment sites, supply from new employment allocations, and employment supply from mixed use allocations – and to confirm the total estimated supply figure between 2014- 2034. The figures should be gross in order to allow direct comparison with the gross OAN figure and housing requirement figure.

[please note, this information should be placed on the Council's website as soon as possible in order to allow representors an opportunity to digest the document and respond to the question below]

- 14) **Response:** In the Local Plan there are significant inaccuracies in the Employment Site Allocations List (Table 2, pages 51-53). Examples are noted in paragraphs 15-18 below. The comments are based on the Lichfields' ELR and local knowledge:

- 15) **Appendix ECNF – ELR 2 Table A.** Shows 12 examples of sites omitted, some of many years' standing. They constitute over 6ha of Employment Land additional to the totals in Table 2. These examples are drawn from local knowledge; there is little doubt that there are many more.

- 16) **Appendix ECNF – ELR 2 Table B.** Shows two examples of discrepancies in the estimated net developable area. It is therefore likely there is significant developable land on other sites recorded as having zero developable land.

- 17) **Appendix ECNF – ELR 2 Table C.** The omission of a figure for the net developable area at Futures Park means the total net developable area is understated by approximately 2.8ha, (approximately 10% of the total.)

- 18) **Appendix ECNF – ELR 2 Table D.** Provides six examples of Small Employment Sites which are not listed. Presumably, as with Tables A and B above, there are many more, providing valuable employment space.
- 19) **Comments:** The cumulative effect of these inaccuracies-and there may be more- is that there is a minimum additional 6ha which increases the existing employment land total to 160.78ha. Additionally, there are 2.8ha of net developable land not included, taking the total for this category to 30.77ha. The corrected employment land allocation figure should be at least 160.78ha + 23.01ha from the New Employment + 8.23ha from Mixed Sites = 192.02ha. **(See Appendix ECNF – ELR 2.)** The completions recorded for the five years from 2014/5 to 2018/9 total only 0.39ha.
- 20) **Question f.** Taking account of the detailed supply information above, how does the employment land requirement compare to the amount of employment land provided for within the Plan? If the estimated supply figure exceeds the employment requirement, is the uplift justified and soundly based? Does it take account of qualitative issues and the aim to reduce out-commuting? Is the supply figure capable of being delivered, or is it intended to allow choice?
- 21) **Response:** RBC has already allocated 27.97ha of net developable area plus the additional net developable land (2.8ha) highlighted in **Appendix ECNF -ELR 2 Section C** giving a total of 30.77ha. The requirement identified in paragraphs 10 and 11 above is 10.72ha not the 27ha claimed by RBC. With a supply of at least 30.77ha there is a 20ha+ surplus.
- 22) **Comment:** Excessive over-supply of employment land is proposed even when taking into account delivery timing and the provision of choice. The 30.77ha cannot be justified on the basis of evidence as uplift, when the requirement is only 10.72ha. Therefore the Policies based on or derived from it are not soundly based.
- 23) **Question g.** How does the level of estimated provision compare to recent rates of employment land take-up in the district?
- 24) **Response:** The average completion figure for the ten-year period between 2008/9 to 2017/8 was 0.39ha per annum, the average over the five-year period between 2014/5 to 2018/9 was 0.10ha per annum.
This shows a significant downward trend in the most recent years and RBC advise that these figures include new-build as well as conversions and changes of use of existing properties and land. They also state the net gain to employment land is less than this amount. **(See the Employment Land Topic Paper, March 2019 Section 3.5. and Appendix ECNF – ELR 5.)**
To illustrate this trend, if a figure of 0.25ha per annum is used instead, then adjusted for the Plot Ratio of 40% used by Lichfields and the fifteen-year period, the revised requirement would be 9.375ha.
- 25) **Comment:** This is an amount very close to the calculation (paragraph 10 above) of a requirement of 9.94ha (without the safety margin) - a long way from the RBC figure of 25ha (also without the safety margin). Once again this highlights that with a soundly based alternative assessment, a much reduced employment land requirement results. This conclusion again indicates that the current employment evidence base and the Plan policies derived from it must be called into question and calculations reviewed and revisited, to ensure reliability and soundness.

- 26) **Question h.** Is the estimated supply of surplus land on existing employment sites based on a comprehensive assessment of all existing sites?
- 27) **Response:** In our Employment Land Analysis we noted examples of both large and small Sites that were omitted, sites being developed but showing zero land availability and an omission from the net developable area. **(See Appendix ECNF–ELR 2 Tables A-D.)**
- 28) **Comment:** The examples above indicate that there may be many other omissions; there is considerable concern that a comprehensive site assessment ‘on the ground’ was not undertaken and that not all planning decisions were analysed fully. The conclusion must be that it is very likely that there are opportunities for expansion on many of the existing sites and those omitted.
- 29) **Question i.** What assumptions have been made about the proportion of employment development that will be delivered on the mixed-use allocations?
- 30) **Response:** RBC should respond to this.
- 31) **Employment policies:**
j-Is the retention of all existing employment sites and sites last used for employment, as set out in Policy EMP3, justified and deliverable? In particular:
- Question:** j i. Does the policy apply to new and existing employment sites which are allocated in Policy EMP2?
- 32) **Response:** This policy has been introduced to address what is only a perceived issue.
- 33) **Comment:** The land losses in recent years have been dramatically reduced and RBC should be looking to revitalise and regenerate areas of the Borough that are not thriving, by re-using former employment sites and replacing vacant, derelict and underused buildings which are no longer fit for purpose, to enhance the overall quality of life for local communities.
- 34) **Question j ii.** Outside these areas, what are the benefits of the policy?
- 35) **Response:** EMP 3 is designed to restrict the land identified to employment purposes and in light of the excessive supply the policy should be withdrawn.
- 36) **Comments:** There appear to be no benefits, the policy should be withdrawn
- 37) **Question j iii.** Is criterion b deliverable where proposed redevelopment schemes involve housing provision only?
- 38) **Response:** RBC should respond, however see paragraph 45 for our comment.

39) **Question j IV.** Are criteria c and e adequately defined?

40) **Response:** No, and neither is paragraph f. See paragraph 45 for our comment.

41) **Question j v.** Does the policy give sufficient recognition to biodiversity/ecology issues?

42) **Response:** RBC should respond to this.

43) **Question j VI.** Why do the demand/viability/structural assessment requirements in criteria j) to l) only apply to proposals for residential re-use?

44) **Response:** These additional conditions are all based on employment land projections that are grossly inaccurate and not fit for purpose.

45) **Comments:** RBC is attempting to show there is a large demand for employment land to justify the use of Green Belt for Employment and Housing. EMP 3 sections b, c, e and j - l are designed to avoid land becoming available for housing. 'Positive contribution' in criterion l is vague. Criterion k is superfluous, if criterion j remains.

46) **Question k.** What is the definition of 'employment -generating development', as set out under Policy EMP4? Does it relate to B1, B2, B8 development, or is it wider than this? Is the policy intended to apply in the countryside and Green Belt?

47) **Response:** RBC should respond to this.

Suggested Revisions.

Table 2 in Policy EMP 2 should be revised to include all existing employment sites.

In Policy EMP 3 delete paragraphs b, c, e and k, and the words between paragraphs i and j. In paragraph l, define 'positive contribution' and delete 'residential'. Change 'the existing buildings' to 'an existing building'.

The Employment Land requirement should be reassessed. On the basis of well-reasoned, justified alternative inputs to the calculation referred to in the ELR, on which the Plan's policies and text are based, the requirement can be reduced to 10.72ha. In this context, the removal of the land from the Green Belt for employment use should be fully re-examined and employment-related policies revised accordingly. **(See ECNF-SoC.)**

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29.08.19.