

ROSSENDALE LOCAL PLAN HEARINGS

MATTER 5 - EMPLOYMENT LAND AND SUPPLY

SUBMISSIONS IN THE LIGHT OF CHANGES ADVANCED BY RBC DURING THE EXAMINATION

Introduction

On Wednesday 25th September 2019 the Examination reviewed Matter 5, and the Council clarified its position by stating that the requirement of 27 hectares of Employment Land that was previously based on the twenty year period from 2014 to 2034 was now the adopted figure for the fifteen year period 2019 to 2034.

When this basis was put to the Inspector, RBC claimed that in view of the increased Employment Land figure their housing number should be increased from 212 dwellings per annum to 236 dwellings per annum taking the total from 3,180 to 3,540 for the fifteen year period of the plan, an increase of 360 dwellings.

Whilst we were able to make some initial brief comments, the full consequences of the changes took time to assimilate. It was inappropriate for RBC to introduce during the Examination such significant changes to the Submission Version of the Plan.

In view of this, we respectfully request that the following considered response to the changes and their implications be taken into account. All of the information in our comments is already in the Hearing Statements; there are no new data.

Comments

1) Job Growth in B-class Employment. RBC's Matter 5 Hearing Statement includes on page 11 under paragraph 5.41 a Table marked as Table 3 and this covers the various scenarios. The basic job growth figures in the Experian Baseline are significantly different from the original Experian Baseline figures and in fact more than double the land requirement for B-class uses from 1.36ha to 2.78ha.

This goes against all the other employment projections where a reduction in job growth is predicted. (Refer to our document ECNF - ELR 3 which included a Table from RBC's Employment Land Topic Paper, Table 1 Section 3.14, which indicates the B1a jobs growth will remain at 311 agreeing with the original figure, the manufacturing job losses, B1c/B2, are expected to increase to 736 rather than the 617 previously predicted and the Warehousing jobs (B8) are expected to grow by 102 jobs which differs significantly from the original prediction of a gain of 185 jobs).

At the Examination Lichfields aligned RBC's proposals for 27ha of employment land with the CS Jobs Target (Scenario 3 in Table 3 on page 11 of RBC's Matter 5 Hearing Statement) and its net growth of 2,369 jobs to support the proposal for 27ha, despite that Hearing Statement's referring to the CS Jobs Target as an outlier (paragraph 5.33, final bullet) and outdated (paragraph 5.42). The figure of 2,369 related to all jobs, not just B-class jobs. The CS Jobs Target should have no bearing on identifying the employment land requirement.

We show B-class job growth (Table 1 below) and employment land requirements (Table 2 below) as projected in the Employment Land Review, the Employment

Land Topic Paper, Scenarios 1 and 3 in Table 3 of RBC's Matter 5 Hearing Statement and Table 2 in that Hearing Statement. Please refer also to the Appendix here to.

Table 1.

B-Class Job Description	Lichfields ELR. Experian Data Scenario 1 17.02.17	RBC Employment Land Topic Paper. March 2019.	RBC Matter 5 Response Experian Data. Sept 2019. Scenario 1	RBC M.5 Response - Lichfields/CS Target Scenario 3	RBC M.5 Response Table 2. Paragraph 5.47 Experian-Baseline December 2018 data.
B1a/b Office	+311	+311	+304*	+419	+370*
B1/B2 Manufacturing	-617	-736	-560*	-391	-845*
B8 Warehousing	+185	+102	+243*	+325	+156*
TOTALS	-121	-323	-13*	+353	-319*

* We requested these figures from RBC on 23 September 2019 but pending their receipt we have calculated them back from the area requirements - see Appendix below.

Table 1 above highlights the dramatic changes that have been made to job numbers to assist RBC in seeking to justify the 27ha they see as the requirement for employment land. We comment as follows:

- B1a/b Office. In the latest Experian update (December 2018) the job growth is 370 over the fifteen year period. This has been increased by 13% to 419 by RBC/Lichfields in the scenario 3 option, which is the closest to align with 27ha.
- B1c/B2 Manufacturing. In the Experian update (December 2018) job numbers for this sector are predicted to decrease by 845 in the fifteen-year plan period. In the scenario 3 option RBC/Lichfields have reduced the job losses by 454 to 391, *i.e.*, by 53.7%.
- B8 Warehousing. Experian in the December 2018 update predicted an increase of 156 jobs. This was increased in scenario 3 by RBC/Lichfields to 325, more than double.

It should be pointed out that the original prediction from Lichfields' Employment Land Review dated 17th February 2017 (Scenario 1) was that B-class jobs would reduce by 121 over the twenty-year period 2014-2034. Now RBC/Lichfields are predicting job growth of 353, nearly four times as much. This cannot be a reasonable basis.

Our calculations for the Employment Land requirements are covered in ECNF - ELR4 and equate to 0.69ha for the period of the plan, some 2.09ha less than the latest Lichfield prediction.

It is imperative when quoting job growth figures that only those associated with B-class employment are used when relating them to the employment land requirement. This particularly relates to the 2,369 figure quoted by Lichfields in the CS Jobs Target scenario.

2) Land Losses. This is the largest component in calculating employment land requirements, accounting for over 80% of the total. In the discussions on Matter 5 we queried the 1.346ha figure used by Lichfields and highlighted that none of the gains has been included in their calculations and that they have ignored the figures for the last two years up to 2017/8 which were readily available to them. If the last two years figures and the gains made from 2010 were added, the annual land loss figure would be reduced to 1.08ha. Lichfields used the period from 2005/6 to 2015/6 and argued that our figures only covered the ten year period from 2008/9 to 2017/8 and as such were incorrect. In our opinion they are fully justified and valid; the ten year figures from 2008/9 to 2017/8 accurately reflect the recent history which includes stricter control being applied by RBC to avoid employment land losses. RBC's proposals to introduce even more rigorous control on the re-allocation of employment land through Policies EMP 3 to EMP 5 would result in the annual land losses being reduced even further during the plan period. In view of this it is our considered opinion that the average Land Loss figure should be no higher than 0.617ha per annum giving 9.255ha over the plan period.

3) Safety Margin/Flexibility Buffer. Lichfields use the 0.99ha figure per annum which was the completion figure for the period 2005/6 to 2015/6 and we updated this figure to reflect the more recent trends. The ten year period we adopted was the same as for Land Losses, 2008/9 to 2017/8, and the average completion per annum on this basis was 0.39ha. This equates to a two year requirement of 0.78ha, not the 1.98ha calculated by Lichfields. It should be noted that the completion figures include conversions as well as new-builds, and change of use of existing properties and land. (See Employment Land Topic Paper March 2019 Section 3.5 and Appendix ECNF - ELR 5.)

4) Total Employment Land Requirement. RBC/Lichfields have selected 27ha for the Local Plan whilst ECNF can only find justification for 10.72ha - please see breakdown of component parts in Table 2 on the next following page:

Table 2.

Source	Job Growth (ha)	Land Loss (ha)	Safety Margin (ha)	Total (ha)
Lichfields-ELR Experian Data. Scenario 1 17 February 2017.	1.36	23.66 for 20 years* (1.183 per annum.)	1.98	27
RBC Employment Land Topic Paper	-0.91	20.20 for 15 years. (1.346 per annum.)	1.98	21.27
RBC Matter 5 September 2019 Updated Experian Baseline	2.78	20.20 for 15 years (1.346 per annum.)	1.98	24.96
Lichfields CS Target Scenario 3.	5.71	20.20 for 15 years (1.346 per annum.)	1.98	27.89
RBC's Matter 5 Experian Baseline December 2018.	-0.28	20.2 for 15 years. (1.346 per annum.)	1.98	21.9
ECNF ^	0.69	9.255 for 15 years (0.617 per annum.)	0.78	10.72

* Basis 1.346ha per annum and then adjusted to give a 27ha total.

^ Refer to ECNF - ELR 1 - 7 for our Employment Land Calculations.

5) Inaccuracies in the Employment Site Allocation List. All the detail relating to the inaccuracies of which we are aware is recorded in ECNF - ELR 2. We have listed those with which we are familiar through local knowledge, but no doubt there are many more throughout the Borough. It is difficult to understand how large manufacturing facilities such as Lancashire Sock and the three Greenway Units, Chatterton Mill, Valmet, Trussform & Mount Spring Works and the Mill in Hargreaves Street, all of long standing, some probably in excess of 100 years, could be omitted. At the Examination it was claimed by RBC that they had conducted a comprehensive survey, as shown in the Employment Land Review but this is clearly not the case. Scrutiny of the Employment Land Review shows that the omissions in the Local Plan can be traced back to the sites' having been omitted from that survey.

Additionally, and equally important, are the newer smaller units such as Bowness Mill Units 1 to 3 that are omitted some of which are empty and for let. RBC need to be required to carry out a full and comprehensive listing of all the existing employment sites before a final decision is made on the employment land requirements. It is likely the result will reduce the requirement even further.

6) Lichfields Briefing Note, dated 24 September 2019 issued 25 September 2019. It is extremely difficult to understand why RBC would go for 27ha of Employment Land which is way beyond their real requirement and then somehow relate it to increasing their housing requirement from 212 to 236 dwellings per year, or from 3,180 to 3,540 for the fifteen year plan period. It is misleading and inappropriate, as the Planning Advisory Service Technical advice note *Objectively Assessed Need and Housing Targets*, 2nd ed., July 2015 explains, to translate future numbers of workspace jobs into future resident population and then into households and dwellings. The result is a jobs-led housing need figure, which is often invalid because most economic forecasts already include a view of future population. RBC has already demonstrated the local housing need to be 212 dwellings per annum, and it is unacceptable in the course of the Examination suddenly to present a higher flawed figure.

7) It is noted that, perhaps conveniently for RBC, this increase is nearly equal to the 415 homes that we have identified as some of our alternatives to the Green Belt site H72 (270 from extant planning permission, 40 from increased site density and 105 from small sites by increasing the annual figure from 18 to 25) and may be an attempt to justify the retention of site H72. The proposal for the land requirement to be set at 27ha also reduces the possibility for excess sites to be used for housing to regenerate areas that have been neglected in the past.

8) **Conclusions.** RBC and Lichfields appear to be exaggerating the employment land requirement to justify the release of Green Belt and to retain for employment land that could be better used for other purposes such as housing. Additionally, by increasing the employment land requirement they then wrongly attempt to relate it to housing needs and to inflate their existing target from 3,180 to 3,540.

RBC are also introducing Policies (EMP 3 to EMP 5) to restrict the re-use of land unsuitable for employment. The effect of these will be to minimise the annual land loss even further and adds justification to our land loss figure of 0.616ha per annum. Having introduced policies to safeguard employment land, RBC have made no reduction to the annual land loss allowance. This suggests that they have no confidence in the effectiveness of those policies.

A further problem with the 27ha figure is that it will inevitably lead to calls to increase the housing target even further, irrespective of whether or not the housing target should be jobs-led. The Lichfields Briefing Note circulated on 25th September 2019 compounds this problem in that the 27ha aligns most closely with the CS Jobs Target and the highest number of dwellings per annum.

There is no justification for the 27ha figure, or for the inaccuracy of the supporting evidence - (see paragraph 5) above. RBC need to conduct a new and thorough audit of the existing employment sites before a final decision is made on the employment land requirement.

The employment land requirement should be reduced to a maximum of 10.72ha over the plan period and the housing number held at 3,180 as in the Submission Version of the Local Plan.

Alan G. Ashworth and Richard W. Lester

3rd October 2019

APPENDIX

Lichfield-Experian 1 Scenario 17.02.17.												
Sector	Number s	Space Req. Sqm	Sub Tot Sqm	Vacancy Factor	Adj Sub Total	Change	Factor* *	Totals SqM	Plot Ratio	Gross Land Requirement.		Job Change
Office. Jobs 2014	3206	12.5	40075	16%	47708					SqM	Hectare s.	
Office. Jobs 2034	3517	12.5	43963	10%	48847	1139		1139	40%	2847	0.285	311
Manufacturing. 2014	5799	45	260955	N/A	260955							
Manufacturing. 2034	5182	45	233190	N/A	233190	-27765	50%	-13883		-34706	-3.47	-617
Warehouse/Distribution. 2014	2317	69.5	161032	8%	175034							
Warehouse/Distribution. 2034	2502	69.5	173889	10%	193210	18176		18176	40%	45439.4	4.544	185
Nett Employment Floorspace Requirement.								5432		13580	1.36	-121
RBC Employment Land Topic Paper												
Office. Jobs 2014	3206	12.5	40075	16%	47708					SqM	Hectare s.	
Office. Jobs 2034	3517	12.5	43963	10%	48847	1139		1139	40%	2847	0.285	311
Manufacturing. 2014	5799	45	260955	N/A	260955							
Manufacturing. 2034	5063	45	227835	N/A	227835	-33120	50%	-16560		-41400	-4.14	-736
Warehouse/Distribution. 2014	2317	69.5	161032	8%	175034							
Warehouse/Distribution. 2034	2419	69.5	168120.5	10%	186800.6	11766		11766	40%	29415.79	2.942	102
Nett Employment Floorspace Requirement.								-3655		-9137	-0.91	-323
RBC Matter 5 Response September 2019 - Updated Experian Baseline.												
Office. Jobs 2014	3206	12.5	40075	16%	47708					SqM	Hectare s.	
Office. Jobs 2034	3510	12.5	43875	10%	48750	1042		1042	40%	2604	0.260	304
Manufacturing. 2014	5799	45	260955	N/A	260955							
Manufacturing. 2034	5239	45	235755	N/A	235755	-25200	50%	-12600		-31500	-3.15	-560
Warehouse/Distribution. 2014	2317	69.5	161032	8%	175034							
Warehouse/Distribution. 2034	2560	69.5	177920	10%	197688.9	22655		22655	40%	56636.62	5.664	243
Nett Employment Floorspace Requirement.								11096		27741	2.77	-13
RBC Matter 5 Response September 2019 - Lichfield/CS Target Scenario 3 25.09.19.												
Office. Jobs 2014	3206	12.5	40075	16%	47708					SqM	Hectare s.	
Office. Jobs 2034	3625	12.5	45313	10%	50347	2639		2639	40%	6597	0.660	419
Manufacturing. 2014	5799	45	260955	N/A	260955							
Manufacturing. 2034	5408	45	243360	N/A	243360	-17595	50%	-8798		-21994	-2.20	-391
Warehouse/Distribution. 2014	2317	69.5	161032	8%	175034							
Warehouse/Distribution. 2034	2642	69.5	183619	10%	204021.1	28987		28987	40%	72467.18	7.25	325
Nett Employment Floorspace Requirement.								22828		57071	5.71	353
RBC Matter 5 Response September 2019 - Experian Updated December 2018, Table ? page 12.												
Office. Jobs 2014	3206	12.5	40075	16%	47708					SqM	Hectares.	
Office. Jobs 2034	3576	12.5	44700	10%	49667	1958		1958	40%	4896	0.490	370
Manufacturing. 2014	5799	45	260955	N/A	260955							
Manufacturing. 2034	4954	45	222930	N/A	222930	-38025	50%	-19013		-47531	-4.75	-845
Warehouse/Distribution.201	2317	69.5	161032	8%	175034							
Warehouse/Distribution.203	2473	69.5	171873.5	10%	190970.6	15936		15936	40%	39840.79	3.98	156
Nett Employment Floorspace Requirement.								-1118		-2795	-0.28	-319