

North Somerset Local Plan 2038

**Draft Employment Land
Topic Paper**

March 2022

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1.0 Introduction

- 1.1 This paper summarises key evidence for the preparation of employment land policy and allocations within the North Somerset Local Plan 2038 Preferred Options. It considers the requirements for employment land supply and, in the context of the preferred spatial strategy for growth, the investigation of options for meeting the requirements to ensure that the local plan provides land and space of the right scale, location, and type.
- 1.2 It also addresses a range of wider related issues including deliverability of employment land and how the local plan can most effectively provide a sufficiently flexible framework to support business growth within a sustainable plan and an indication of where further evidence may be required to support plan preparation. Key drivers will focus on how green economic growth can be unlocked, and how planned investment in infrastructure, particularly transport infrastructure can act as a catalyst for economic growth.

2.0 Planning Policy Context

National context

- 2.1 Economic development is an integral part of sustainable development as set out in NPPF, paragraph 8. Paragraph 82 of the NPPF reads:

“Planning policies should:

- a) set out a **clear economic vision and strategy which positively and proactively encourages sustainable economic growth**, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- b) **set criteria, or identify strategic sites**, for local and inward investment to match the strategy and to **meet anticipated needs over the plan period**;
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- d) **be flexible enough to accommodate needs not anticipated in the plan**, allow for new and flexible working practices (such as live-work accommodation), and to enable a **rapid response to changes in economic circumstances.**”

Strategic context

- 2.2 North Somerset Council is part of the West of England sub-region, along with South Gloucestershire Council, Bath and Northeast Somerset Council, and Bristol City Council, for which a Functional Economic Market Area (FEMA) is defined¹. NSC jointly commissioned the Employment Land and Spatial Needs Assessment (ELSNA, 2020) with WECA and the other West of England authorities to contribute to the evidence base for employment planning across the West of England. The key outcomes of this study for North Somerset are outlined in this paper so far as they relate to requirements for employment land.
- 2.3 Considering any strategic, cross-boundary issues in relation to employment planning may be required, considering the outcomes of the ELSNA. Not least amongst these issues is how business growth can be best accommodated in the context of competition for land from competing uses, especially residential development, and how business growth can be integrated into a wider growth strategy underpinned by clear low carbon aspirations.

Emerging North Somerset Local Plan

- 2.4 Upon adoption, the North Somerset Local Plan 2038 will supersede employment related policy content from the North Somerset Core Strategy (2017), the Sites and Policies: Development Management Plan (2016), and the Sites and Policies: Site Allocations Plan (2018). The Preferred Options document contains strategic policies for employment (Policy SP9), detailed development management policies (including DP20, DP61, and DP62), and site-specific allocations for new business uses (Schedule 2), the latter proposed in line with the plan's overarching spatial strategy for growth (Policy SP3).

Challenges consultation

- 2.5 The Challenges for the future consultation took place from 22 July to 2 September 2020. This document identified supporting the economy as a key challenge for the new local plan. As part of this, the document set out the need for the local plan to identify the scale of jobs growth to 2038, the need to tackle inequalities through economic growth, whilst noting the uncertainty created by macroeconomic issues relating to BREXIT and the COVID-19 pandemic.

¹ Atkins (2016) for the West of England Authorities - 'Economic Development Needs Assessment'

2.6 Drawing upon the Employment Land and Sites Review (ELR 2018)², the consultation referred to potential jobs' growth of around 13,500 jobs across the plan period and a potential land requirement of 28.5ha, whilst referring to the need for additional work to assess replacement land needs – where employment land and space needs to be re-provided because of losses/upgrading within the existing stock. The consultation also referenced recent policy drivers at Weston-super-Mare including the employment-led strategy, the J21 Enterprise Area, and the need for the new local plan to reflect the changing nature of the economy, sector make-up, current and emerging working patterns, and the resulting implications for land allocation.

Choice's consultation

2.7 Following the Challenges consultation, North Somerset Council consulted upon the Choices for the future from 2 November to 14 December 2020. The Choices document identified the following within a set of Strategic Priorities for the local plan 2038:

- *To increase the number and range of job opportunities across the district, particularly at the towns to give people the opportunity to work close to where they live.*

2.8 The main aim of this consultation was to explore alternative approaches to the broad distribution of growth across North Somerset, illustrated with the four approaches reproduced below.

² Atkins (2018) North Somerset Employment Land Review

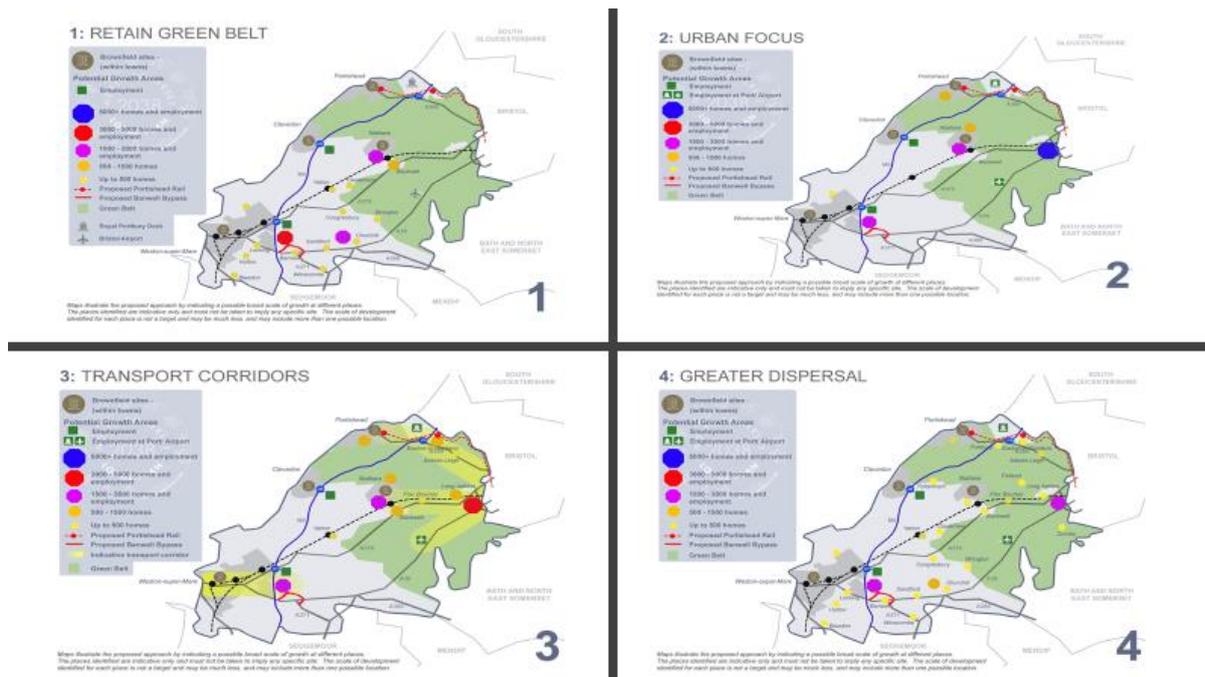


Figure 1: Alternative approaches to distribution of growth – Choice's consultation

2.9 As well as new housing, these approaches included employment as an integral part of the approaches to growth, with employment provision proposed across the following three typologies:

- [Employment development delivered through] urban regeneration and re-using previously developed land, particularly at town centres.
- [Employment development delivered through] mixed use developments including housing and jobs at the larger Potential Growth Areas.
- [Employment development delivered through] new strategic business locations.

2.10 Urban potential and opportunity for new strategic provision well-related to the main towns are common features to be investigated further as they are features that are considered compatible with any selected spatial strategy. The variation across the approaches is particularly focused on the distribution of the larger scale opportunities with a working principle that new employment provision will feature as part of all the larger growth areas, with scale, type, and specific location within the growth area to be considered through further plan preparation and master planning. A general principle of the approach to employment land provision is reflecting existing objectives of aligning homes and jobs across the main areas of population.

Selection of preferred spatial strategy

- 2.11 On 28 April 2021, the North Somerset Council Executive³ agreed the recommendations for a new spatial strategy with the overarching approach as follows (underlining added):

“Priority will be given to locating new residential and mixed use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel, particularly at locations which are currently, or have the potential to be, well served by public transport. Employment opportunities will be encouraged at accessible locations well-related to the urban areas and where sustainable transport opportunities can be maximised. Residential development in areas at risk of flooding will be minimised outside the towns. The amount of development at villages and in the countryside will relate to local community needs.”

- 2.12 Later in the Executive Report when addressing how effective provision can be made for employment needs, the importance of considering existing business needs is addressed:

“It will be essential that the plan addresses the need for grow on and flexible workspaces as well as a positive approach to the expansion in situ of existing businesses.”

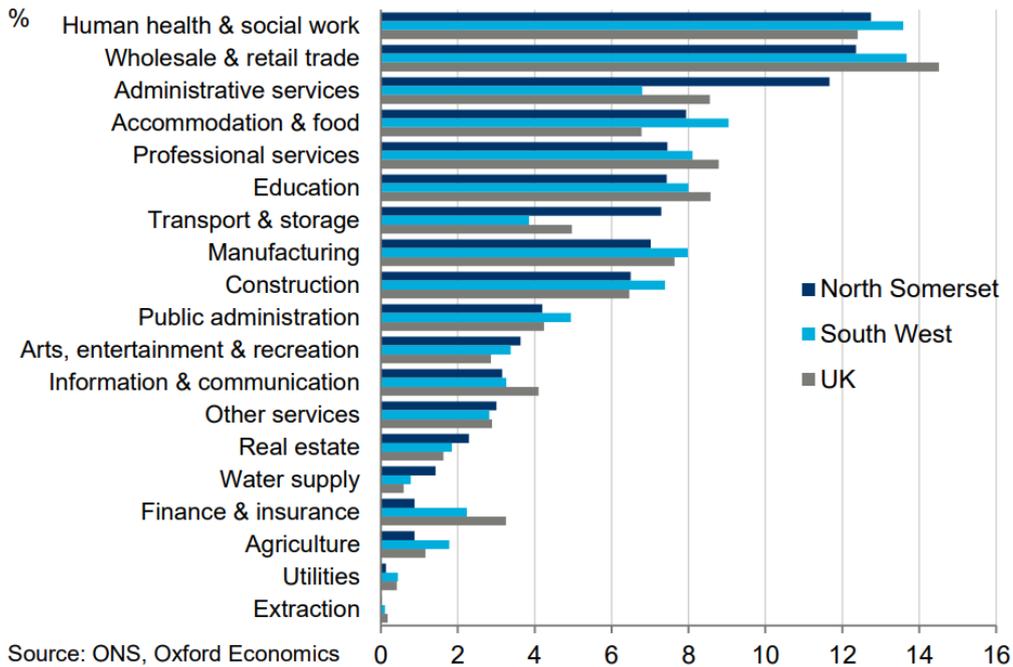
3.0 Employment change over the Local Plan 2023-38 period

2019 economic sector makeup

- 3.1 Forecasts of future economic growth used for planning purposes indicate future employment change across a range of economic sectors. Econometric models are used to model this and provide a starting point for consideration in plan making alongside other objectives and indicators. Forecasts provide a picture of how these sectors are likely to change considering prospects for growth and wider factors that might influence change, although the accuracy of forecasts particularly in the context of major economic uncertainty, needs to be considered and used appropriately.

³ The NSC Executive endorsed a preferred spatial strategy on 28 April 2021, set out in the [Executive Report](#)

3.2 Fig 2 shows the sector make-up of employment in North Somerset in 2019 compared to the southwest and wider UK economy. Notable sector variations include, weaker retail trade, financial and insurance and professional services, and manufacturing, compared to much stronger administrative services, and transportation and storage.



Source: ONS, Oxford Economics 0 2 4 6 8 10 12 14 16
 Figure 2: North Somerset share of jobs by sector – 2019 ONS, Oxford Economics

Estimating future employment change

3.3 For a historic reference point, Figure 3 provides the trend jobs change for the period 2000 to 2019, indicating employment change in North Somerset of +31,853 jobs representing 22% of total jobs change for the West of England over that period. Consultants Atkins advise that retail and healthcare, and professional services are key sectors that have accounted for this growth. Administrative and support services have seen growth compared to the other West of England authorities whilst manufacturing has seen a decrease consistent with the other authorities.

Table 6-7 - Change in Total Employment 2000-2019

Area	2000	2005	2010	2015	2019	Change (2000-19)	% change (2000-19)
Bristol	267,341	259,785	267,002	291,641	311,035	+43,694	16.3%
BANES	87,453	97,828	95,039	99,317	105,381	+17,928	20.5%
South Gloucestershire	126,251	160,902	158,557	163,044	175,039	+48,788	38.6%
WECA total area	481,045	518,515	520,598	554,002	591,455	+110,410	22.9%
North Somerset	75,170	85,624	88,455	98,674	107,024	+31,853	42.4%
West of England	556,214	604,140	609,053	652,677	698,479	+142,264	25.6%

Source: Oxford Economics

Figure 3: Change in total employment 2000-2019

Latest Oxford Economic forecasts (2020)

3.4 The latest economic forecasts drawn upon for plan preparation are those from Oxford Economics in 2020 used for the ELSNA study. The forecasts⁴ provide a baseline, downside, and upside scenario for employment change. Notably, for North Somerset and South Gloucestershire, they indicate a flattening of employment growth following the pandemic following relative sustained strong growth in employment from the early 1990s. By comparison, for Bristol and BANES, net employment change reflects stronger growth indicating an increased share of West of England employment growth for these authorities over the forecast period 2020-40.

3.5 In general, forecast employment change is reflecting regional trends e.g., decline in manufacturing, and growth in real estate and health services. More locally, when comparing employment change over the forecast period between North Somerset and Bristol, the percentage change, either upwards or downwards is similar across some of the sectors. Notable deviations include:

- stronger percentage growth in the construction sector in Bristol perhaps linked to greater development pressure;
- growth in the wholesale retail sector in Bristol compared to decline in North Somerset;
- stronger growth in transportation and storage in Bristol compared to growth in North Somerset;
- Stronger growth in Bristol in accommodation and food service activities;

⁴ Forecasts generated using the Oxford Local Authority District Forecasting Model taking into account national and regional outlooks.

- Stronger percentage growth in Information and Communication in North Somerset with decline in Bristol;
- Greater decline in Financial and insurance activities in Bristol versus decline in North Somerset;
- stronger percentage growth in the real estate sector in Bristol perhaps linked to greater development pressure;
- Stronger growth in Bristol in Professional, scientific, and technical activities;
- Stronger growth in Bristol in Administrative and support service activities;
- Greater decline in public administration in North Somerset,
- Stronger growth in Bristol in education;
- Stronger growth in Bristol in Human health and social work activities;
- Stronger growth in North Somerset in Other service activities.

3.6 Taking the forecast change across the various sectors together, because Bristol is indicated to have stronger percentage growth across most of the sectors, this combines to create an overall increased net growth in jobs over the forecast period of around 45000 jobs between 2020 and 2040. The net position for North Somerset is that of reduced net growth, comprising significant losses in manufacturing, and weaker growth (compared to historic trends) across a range of other sectors. Employment growth sectors include construction; information and communication; real estate activities; professional, scientific, and technical activities; administrative and support service activities; human health and social work activities; and arts, entertainment and recreation with overall net change indicated to be around 7600 jobs 2020 to 2040. This is a notable difference when compared to the preceding 20 years employment change for North Somerset.

3.7 The level of employment growth indicated by the OE forecast has implications for sustainable growth and travel patterns generally in North Somerset, particularly long-standing objectives of balancing jobs and homes across North Somerset, increasing self-containment and reducing out-commuting. For North Somerset, the level of jobs growth implied by the forecasts is below that required to meet the employment needs of the growing labour force. This suggests that there may be greater pressure to commute to jobs outside of North Somerset although greater remote working practices may provide some counterbalance. For comparison, the ELSNA provides a housing/population-led scenario that indicates that around 10,000 jobs would be required over the local plan period taking into account the dwelling requirement, in order to maintain the current balance between jobs and homes.

Comparing a wider range of forecast scenarios

3.8 The analysis above is for the baseline 2020 Oxford Economic forecast. A variety of employment change forecasts have been reviewed mainly from the following sources and this evidence will be subject to ongoing review throughout the local plan preparation:

- Experian economic forecasts that were used as part of the North Somerset Employment Land Review carried out in 2018
- Oxford Economic forecasts used as part of the more recent West of England Employment Land Spatial Needs Assessment in 2020

Forecast scenario	Employment change	Annual average employment change (FTE) implied
Current Core Strategy (based upon economic forecasts prepared prior to 2012)	10,100 ⁵ 2006 to 2026	505
Roger Tym (2008) for SWRA – North Somerset district 'higher growth'	15,700 2006 to 2026	785
Oxford Economics (2010) central trend scenario for North Somerset	17,000 2006 to 2026	850
Atkins, ELR 2018: Scenario 1: Labour demand Experian	15,400 2016 to 2036	770
Atkins, ELR 2018:	17,200 2016 to 2036	860

⁵ This was viewed as being a somewhat pessimistic forecast by some respondents to the Core Strategy influenced by the economic downturn in 2008.

Scenario 2 – Labour demand: Experian forecast uplift		
Trend forecast (using Experian historical data)	18,000 2016 to 2036	900
West of England (2020) Employment Land and Spatial Needs Assessment		
Historic data (using Oxford Economics model data)	31,853 2000 to 2019	1676
Oxford Economics Short-term COVID-19 impact base	3000 2019 to 2025	500
Oxford Economics Short-term COVID-19 impact 'downside'	900 2019 to 2025	150
Oxford Economics Baseline	7750 <u>2020</u> to 2040	388
Oxford Economics Downside	5750 <u>2020</u> to 2040	288
Dwelling/population-led forecast based upon Standard Methodology	13,800 2019 to 2040	657
Table 1: Comparing economic forecasts		

3.9 Table 1 presents a wider range of forecasts comparable by the annual average. This indicates a major difference between trend employment change to that forecast, particularly when considering the latest Oxford forecasts used for the ELSNA study. Given the current uncertainty compounding the usual variation across forecasts, it isn't considered prudent to align the local plan to a single forecast but to ensure sufficient land is provided to support the most likely range, and for the benefit for ensuring

sufficient land is present in line with national policy, to err on the side of caution.

- 3.10 On this basis it is considered reasonable to plan for at least 10,000 jobs over the plan period that would average around 670 jobs per year. This is below the level indicated by pre-pandemic economic forecasts, and based on historic trends, but exceeds the numbers indicated by the baseline and downside OE forecasts. Evidence on economic forecasts should be kept under review. However actual employment land supply should be based upon consideration of factors beyond purely quantitative forecasts e.g., considering opportunities in the local area for growth and the requirements of sustainable development.

4.0 Employment land requirement for the new Local Plan 2023-38

North Somerset Employment Land Review (2018)

- 4.1 In 2018 Atkins prepared an Employment Land Review to support the preparation of the local plan. This local plan was not progressed following the withdrawal of the Joint Spatial Plan however the ELR 2018 still provides a useful evidence base for the new local plan 2038. Importantly it predates the COVID-19 pandemic thereby presenting a more stable set of economic forecasts, albeit for the period 2016 to 2036. However, the forecasts will not reflect any impacts on economic sectors as a result of the pandemic and this needs to be considered.
- 4.2 The ELR 2018 recommended an additional employment land requirement of 39ha for the period 2016 to 2036 to meet the forecast needs of new business growth. This was based upon industry standard econometric modelling and translation into land requirements, providing an indication of land requirements for new employment growth across the traditional employment land typologies: B1a/b, B1c/B2, and B8. This requirement did not factor in any replacement needs for existing business space being lost to other uses or becoming obsolete.
- 4.3 The 39ha was split as follows:

B1a/b	B1c/B2	B8
17ha	7ha	15ha

Table 2: B Class land requirements for North Somerset: 2016 – 2036. ELR 2018

Application to new local plan

- 4.4 The ELR 2018 provides an indication of an annual requirement for 1.95ha of employment land per year based upon an even spread of the requirement over the forecast period. If this is used as a multiplier for the period 2023 to 2038 the requirement would be 29.25ha, although doesn't allow for replacement needs.

West of England context

West of England Employment Land and Spatial Needs Assessment (2021)

- 4.5 The ELSNA study has been prepared for the West of England area to provide evidence for the West of England Combined Authority - Sustainable Development Strategy, the WECA authorities respective local plans, and the North Somerset Local Plan 2038. Given this range of plan making, the ELSNA study relates to the period 2020 to 2040.
- 4.6 The ELSNA follows a typical methodology for the identification of quantitative and qualitative employment land requirements but has taken an innovative approach to focusing the analysis around specific market sectors set out below, and their translation into employment land needs. These market sectors have been mapped from the underlying SIC sectors.

Table 0-1 - Key Market Sectors

Broader Manufacturing (including Aerospace and Advanced Engineering)	Housing, Construction and Development
Creative and Digital	Transport and Logistics
Professional Services	Health and Life Sciences
Retail, Culture and Leisure	Tourism
Food and Rural Enterprise	Circular Economy (Waste)
Public Administration	Education

Source: WECA (2020)

Figure 4: ELSNA Key Market Sectors

Employment land requirements for the West of England

- 4.7 The ELSNA indicates an overall West of England requirement for 1,700,500sqm of floorspace⁶, translating to 274ha. This demand includes both demand derived from future economic forecasts of growth, and demand related to the need to replace existing stock. The broad distribution of this need across

⁶ See Table 6-19 of ELSNA Final Report.

unitary authorities is as follows: Bristol: 155ha (58%), BANES:30ha (11%), North Somerset: 18ha (6%), and South Gloucestershire: 71ha (24%). The relatively low percentage of land to North Somerset is reflecting the underlying reduced share of employment growth.

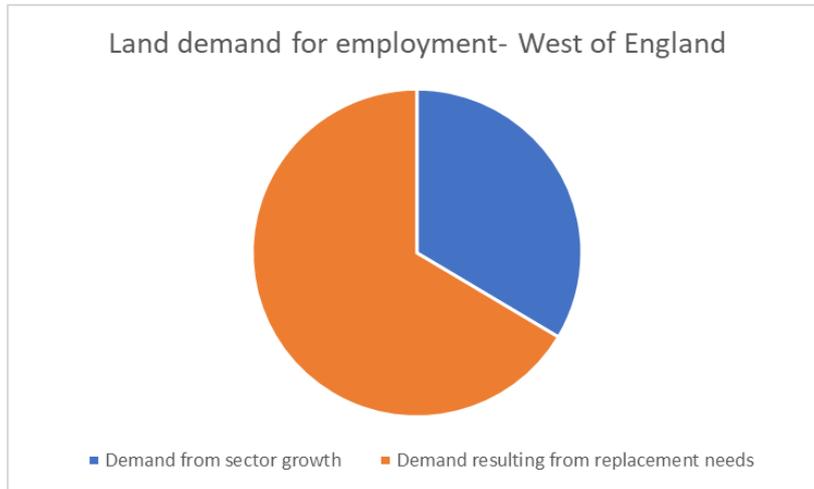


Figure 5: Land demand components – sector growth vs replacement demand

Unpacking the 274ha

4.8 Based upon the Baseline quantitative scenario for growth⁷, the ELSNA recommends that up to the period to 2040 the West of England should accommodate 631,000sqm through additional demand (growth across the sectors). This comprises 303,000 sqm office, 155,500 sqm research and development, -9,000 sqm industrial, 135,000 sqm storage and distribution and 46,500 sqm retail. Expressed in terms of land (in hectares), additional demand driven by anticipated employment growth amounts to approximately 92ha in total, made up of: 34ha for offices; 27 ha for research and development; -2 ha for industrial; 27 ha for storage and distribution; and 7 ha for retail.

4.9 A separate assessment of the needs for replacement land (land provided to offset loss of employment land and space due to loss to other uses or no longer fit for purpose) has been identified and is anticipated to be greater for industrial and storage premises (ELSNA; page 10). Total replacement need was estimated at 1,069,000 sqm. This will need to be provided for either in-situ through re-build and upgrade or as additional provision elsewhere. Total replacement demand amounts to approximately 182ha of total employment land

⁷ Oxford Economics 2019

need across the West of England. Together these combine to generate the 274ha overall.

Employment land requirements for North Somerset – quantitative forecasts

4.10 Paragraphs 4.7 to 4.9 set out the initial ELSNA findings for the West of England. This section draws out the findings for North Somerset as a component part.

4.11 Table 3 presents the North Somerset component of the ELSNA baseline forecasts and indicates a total of 18ha for the period 2020 to 2040.

	Office	Research and development	Industrial	Storage and distribution	Retail	Total net
Requirement in floorspace (sqm)						
Forecast driven demand	26,500sqm	13000	-31,500	-4500	3500	7000
Replacement demand	13,500	35	41,500	28000	16000	99,000
Total demand	40000	13000	-10750	16500	19500	106000
Requirement in land (ha)						
Forecast driven demand	4	3	-7	-1	1	0
Replacement demand	2		8	6	2	18
Total demand	6	3	1	5	3	18
Table 3: North Somerset component of baseline land forecasts						

Employment land requirements – qualitative adjustment

4.12 Atkins carried out market engagement through the ELSNA preparation and considered a series of ‘drivers of change’ considered to have an influence on future demand. As a result, Atkins identified that the forecast need summarised above (not including the replacement requirement), was likely to underestimate demand, particularly in relation to industrial space needs. Atkins draw attention to the considerable uncertainty in future economic prospects because of the COVID pandemic, BREXIT, and future recovery and this needs to be borne in mind when planning for economic growth taking into account point (d) of national policy as set out in paragraph 2.1 above. As a result, the ELSNA includes a qualitative adjustment to the demand forecasts.

4.13 Table 4 reflects the qualitative adjustment across the use types, in most cases leading to an upwards adjustment across the typologies, most significantly in the industrial uses:

Demand scenario (not including replacement need)	Office	Research and development	Industrial	Storage and distribution	Retail
Oxford forecasts (total ha over ELSNA period)	34	27	-2	27	7
Qualitative adjustment (total ha over ELSNA period)	36 (+2)	35 (+8)	66 (+68)	46 (+19)	7
Table 4: Qualitative adjustment to West of England demand requirements					

4.14 This adjustment, once added to the replacement requirement, indicates a total demand for 372ha for 2020 to 2040 for the West of England as a whole, adding a further 98ha to the overall requirement. This is indicative of the weakness in the underlying economic forecasts and the requirement for a wider evidence base including qualitative analysis. The summary below explains how this adjustment, identified through the qualitative scenario, relates to forecasts for North Somerset.

Employment land requirements for North Somerset – qualitative scenario

4.15 This qualitative adjusted scenario determines a different split of total employment land need by authority – Bristol: 46%, BANES: 11%, South

Gloucestershire: 33%, and North Somerset: 10%, - indicating a greater provision of land to the authority areas surrounding Bristol compared to the quantitative demand assessment. Table 5 provides the qualitatively adjusted figures for North Somerset.

	Office	Research and development	Industrial	Storage and distribution	Retail	Total net
Requirement in land (ha)						
Forecast driven demand	5	4	7	3	1	20
Replacement demand	2		8	6	2	18
Total demand	7	4	16	9	3	38
Table 5: North Somerset requirement, qualitative adjustment – (ha)						

4.16 Table 5 indicates a total demand of **38ha** for the period 2020 to 2040 including both forecast demand and supply to meet replacement needs. The qualitative analysis indicating an additional requirement for 20ha compared to the baseline figure of 18ha set out in Table 3.

4.17 For the 20-year period this averages at 1.9ha per annum. If this is used as a multiplier for the period 2023 to 2038 the requirement would be 28.5ha.

Employment land requirements for North Somerset – housing-led (labour supply) scenario

4.18 For comparison, the ELSNA assessed the scale of land required assuming the current ratio of jobs and homes is maintained and applying the level of new homes growth identified by the standard methodology at that time (1365 new homes per year). This indicated a requirement for **40ha** for North Somerset 2020-2040 (not including any component of replacement need). In theory, this is the broad scale of land demand required to ensure new jobs match the growth in the new working age population, whilst maintaining the current job density (number of jobs per worker). For North Somerset this inherently assumes the current degree of commuting where in North

Somerset, there are fewer jobs than workers, will be maintained, indicating a continuation of the current level of self-containment. This is important in relation to minimising or not exacerbating car-based commuting into Bristol.

4.19 By comparison, the future demand scenarios presented in the ELSNA indicate a significant shift in future job share to Bristol with significant implications for sustainability, and potentially a worsening of self-containment, and increase in out-commuting. This places emphasis on:

- Maximising sustainable travel choices to the main current and future economic hubs including at Bristol,
- A spatial strategy that includes new growth closer to main economic centres
- Seeking to balance jobs and homes in key urban areas to seek to support sustainable patterns of growth and commuting patterns.

4.20 Based upon an average annual rate, the 40ha can be attributed to the local plan 15-year period at 2ha per year equating to an overall requirement of 30ha.

Business space and land enquiries

4.21 Consideration of forecasts needs to be balanced with wider indicators of future demand. North Somerset Council receives regular enquiries for business land. Since October 2021, enquiries for business space in excess of around 18,000sqm has been received with interest for within the next few years. This interest links to sectors including manufacturing, including food manufacturing, financial and professional services, and creative industries. This reflects some of the forecast growth in sectors such as professional services and the creative industries, but also indicates potential for stronger manufacturing growth contrary to the Oxford forecasts.

4.22 Geographically this interest is linked to the main towns and close to Bristol which would support the approach taken in the local plan to focusing growth in these areas.

Summary of land requirement for new Local Plan

4.23 Comparing the ELR 2018 and the ELSNA, both of those studies indicate a similar annual average land requirement of 1.9ha, albeit being based on different components of demand with ELSNA drawing in replacement needs in addition. Applying this to the new North Somerset local plan period, (which falls within the wider ELSNA forecast period) a land requirement of 28.5ha is indicated.

- 4.24 By comparison, the housing-led scenario indicates that around 30ha would be required to maintain the current jobs density and to avoid future worsening commuting pressures and maintain a similar balance between jobs and working age population in North Somerset. If the identified replacement need of 18ha is added to this figure, a total requirement of **48ha** is required.
- 4.25 It is therefore proposed that as a minimum, the new local plan makes provision for **48ha** of employment land but also to consider further allocations to offer choice to the market; encourage sustainable patterns of growth; meet local business needs; meet any unforeseen opportunities arising; and offer some contingency in case of non-delivery of other supply opportunities. This is considered a reasonable approach in the context of national policy and considerable uncertainty in the underlying economic forecasts. It would support the delivery of jobs at the current forecast level, seek to avoid any further worsening in self-containment across North Somerset and facilitate replacement needs over the plan period. Any additional provision should be based upon allocation of deliverable sites, meeting opportunities for economic growth in the local area.

5.0 Delivering the North Somerset employment land requirement

Overarching spatial strategy for growth and further investigation of employment opportunity

- 5.1 Section 2 outlined the current stage of preparation of the North Somerset Local Plan and set out the overarching spatial strategy. This provides a guide to the identification of land supply opportunities to meet employment land requirements, emphasising the importance of locating development within or well-connected to the main urban areas. Opportunities for employment land provision in the emerging local plan has included consideration of:
- a review of extant business allocations from the Site Allocations Plan (2018); and,
 - provision of employment within the strategic growth areas proposed in the draft local plan including Wolverhill (Draft Policy LP1), Yanley Lane (Draft Policy LP2), and at Nailsea and Backwell (Draft Policy LP3).

Review of extant allocations

- 5.2 North Somerset currently has around 60ha of land allocated for employment use under Policy SA4 of the Site Allocations Plan. The ELR 2018 provided an

assessment of each of the extant employment land allocations and the extent to which they provide a suitable opportunity for future business land supply, and this forms a key part of the evidence base for the inclusion of these sites in the new local plan. In some cases, the assessment has indicated the extant allocation to be of poorer quality (see North Somerset Employment Land Review, (2018) for further detail).

- 5.3 The extant allocations have been reviewed in the context of the emerging spatial strategy. Most of the sites are compatible in principle with the new local plan preferred spatial strategy due to them being largely either within or close to a main town.

Estimating the scale or employment land requirement at the strategic growth areas

- 5.4 In line with the selected spatial strategy, opportunities for growth have been investigated through a series of Broad Locations that relate to land surrounding the main urban areas. From this work, large-scale growth opportunities have been identified at Wolverhill, Yanley Lane, and at Nailsea and Backwell. In line with the spatial strategy, the Strategic Priority identified in paragraph 2.7, employment is being considered as an integral element of this potential growth. At this stage, for these strategic locations the Draft Local Plan has not identified specific sites for employment allocation as this will be subject to more detailed investigation including master planning. However, the draft plan does provide an overall indication of the scale of employment required in these areas based upon the following methodology.

Methodology for identifying employment land at strategic growth areas

- 5.5 The following analysis is used to provide a benchmark employment land provision based on an assumption of planning for one job per home at the larger development sites. This recognises the importance of local provision of employment close to populations to support self-containment and local accessibility to a range of employment opportunities. Applying this as a method for generating indicative employment land supply figures is considered to offer a reasonable starting point. There may be a case to either increase or decrease the supply based on the circumstances of each location. For example, the location may have more of a strategic role where the provision of employment could be serving a wider need in which case increasing supply to meet this opportunity may be an option, or employment allocations may be reduced because employment provision is being increased in a nearby urban location.
- 5.6 Based upon the evidence of the ELSNA and the split of employment in North Somerset across key market sectors, an overall estimation is made of the number of B class jobs across those sectors, and this can be compared to the

overall jobs in North Somerset. This can be used as a proxy for each strategic location, identifying a total jobs provision based upon the number of new homes, and a B class subset. Using standard assumptions for plot ratio and employment density, an average hectare per job can be calculated. This can be used as a multiplier for each site to provide a broad indication of the scale of land that would be required to facilitate that scale of jobs based upon an identified number of homes. The inherent uncertainty of future take up should be kept in mind however and this is recognised as a theoretical method and needs to be subject to further investigation. However, it is considered useful in providing one scenario for supply that can be compared with specific land/masterplan opportunities.

5.7 This method calculates the following supply figures:

- **Wolvershill Strategic Site: 11.3ha @ 2800 units**
- **Nailsea and Backwell: 8.1ha @ 2150 units**
Nb. The Nailsea and Backwell provision is calculated on the following sites: Land south of Nailsea, 600 units; Youngwood Lane, 450; Grove Farm, 600; Land east of Backwell, 500.
- **Yanley Lane Strategic Site: 9.8ha @ 2500 units**

Other locations well-related to urban areas with motorway access

5.8 Large-scale opportunities have been promoted at M5 J21 and J20 indicating land availability. These would be anticipated to be attractive business locations due to the access to the M5 and may support logistics and distribution sectors, however they are located within the flood zone and do not necessarily contribute to the creation of sustainable communities. The transport implications of these locations would also need to be tested cumulatively with wider proposals.

Review of call for sites submissions

5.9 A range of sites submitted to the local plan call for sites⁸ related to employment uses. The vast majority of these were also submitted for residential use. A schedule of these sites is set out in Appendix 1, and these will be subject to ongoing review to identify the potential for them to contribute to land supply. However, at this stage, sufficient provision has already been identified through the draft Local Plan.

⁸ summer 2020

Summary of supply opportunities

- 5.10 Across the sources of supply, a wide range of sites are identified with sufficient potential to meet the scale of demand over the plan period.
- 5.11 Appendix 2 sets out a schedule of proposed employment allocations to consider through the Preferred Options consultation. This totals some 70ha of land. Whilst this exceeds the scale of land indicated through latest forecasts, it is considered to offer the flexibility and choice in line with national policy and to provide land in the event of additional demand arising.

6.0 Conclusions

6.1 The following conclusions are drawn:

- Planning for economic growth is inherently uncertain, especially in the current climate, and therefore caution needs to be applied when interpreting economic evidence. A range of factors should be considered when developing policy approaches in the local plan. To ensure sustainable business growth is supported, the local plan should provide a flexible framework within an overarching strategy for growth.
- This paper summaries key evidence available at present. Any further evidence submitted to the local plan consultation should be considered, and if necessary, a further review of the findings of the ELSNA should be carried out, particularly review the underlying economic forecasts.
- The draft local plan proposes around 70ha of land allocation for business use (set out in Appendix 1). This is based upon a review of extant allocations, and provision at the new growth areas. Whilst this exceeds the minimum requirement indicated through the evidence, it would provide a choice to the market, allow some flexibility to accommodate any needs not anticipated through the plan in line with NPPF para 82(d), allow any unmet needs to be catered for from elsewhere across the FEMA, and provide opportunity to support sustainable patterns of growth and movement across North Somerset and the wider market area.
- Opportunities to support sustainable economic growth should be maximised including supporting growth in sectors that encourage a low carbon economy, and in terms of providing employment close to centres of population to maximise active/sustainable travel and modern working patterns.

- Further work investigating how investment in planned infrastructure particularly transport infrastructure at the main urban areas, can support new and enhanced economic growth, providing opportunities for existing businesses and unlocking new growth.
- The proposed employment land supply would support the delivery of at least 10,000 new jobs over the plan period - a level required to help ensure that the existing balance between jobs and homes and levels of commuting is not worsened.

Appendix 1: Proposed employment land schedule

Site location	Site area (hectares)	Comments
Edge of Bristol		
Yanley Lane (Woodspring golf course)	9.8	Proposed new allocation
Total	9.8	
Weston-super-Mare		
Haywood Village Business Quarter	17.7	Carried forward from Site Allocations Plan, with adjusted boundary
Parklands Village site A	0.30	Carried forward from Site Allocations Plan, with adjusted boundary
Parklands Village site B	3.0	Carried forward from Site Allocations Plan, with adjusted boundary
Parklands Village site C	0.37	Carried forward from Site Allocations Plan, with adjusted boundary
Parklands Village site D	1.67	Carried forward from Site Allocations Plan, with adjusted boundary
Parklands Village site E	1.82	Carried forward from Site Allocations Plan, with adjusted boundary
Parklands Village site F	0.47	Carried forward from Site Allocations Plan, with adjusted boundary
Parklands Village site G	0.31	Carried forward from Site Allocations Plan, with adjusted boundary

Site location	Site area (hectares)	Comments
Parklands Village site H	0.57	Carried forward from Site Allocations Plan, with adjusted boundary
Parklands Village site I	0.12	Carried forward from Site Allocations Plan, with adjusted boundary
Wolvershill (north of Banwell)	11.3	Proposed new allocation
West Wick Business Park	5.3	Carried forward from Site Allocations Plan
Summer Lane, North of A370	2.54	Carried forward from Site Allocations Plan, with adjusted boundary
Moor Park, A371	1.23	Carried forward from Site Allocations Plan, with adjusted boundary
Aisecombe Way	0.5	Carried forward from Site Allocations Plan
Total	47.2	
Other towns		
Clevedon 5/20 Kenn Road Business Park	2.1	Carried forward from Site Allocations Plan, with adjusted boundary
Land at Nailsea and Backwell	8.1	Proposed new allocation (See Policy LP3)
Gordano Gate Portishead	1.1	Carried forward from Site Allocations Plan
Total	11.3	
Villages		
Park Farm, Yatton	0.42	Carried forward from Site Allocations Plan

Site location	Site area (hectares)	Comments
Estune Business Park, Long Ashton	0.38	Carried forward from Site Allocations Plan
Total	0.8	
GRAND TOTAL	69.1	

Appendix 2: Sites submitted for employment consideration

Around 52 sites that were submitted to the summer 2020 call for sites were put forward for employment (amongst other) uses. These form potential alternatives to the draft allocations set out within the Regulation 18 Consultation Draft. These sites can be viewed from the SHLAA documents or the Broad Location templates.

Associated SHLAA site reference	Site/ location	Area (ha)	Broad Location/ Village area of search
HE208	Land south of Moor Park, A371	9.0	WSM
HE2010	Backwell Hill Road B	0.2	Nailsea and Backwell
HE2018	Parsonage Farm, Church Lane, Long Ashton	7.3	Edge of Bristol
HE2021	Land at Bridge Farm, Yanley Lane, Long Ashton	13.9	Edge of Bristol
HE2036	Land to the west of Kenn Road	9.5	Clevedon
HE2055	Heathgate Farm, Hewish	13.0	Outside any area of search
HE2076	West of Hill Road, Winscombe	0.9	Winscombe
HE2077	Hill Road, Sandford	2.5	Winscombe
HE2083	Purn House Farm industrial estate	2.4	Bleadon
HE2085	Langford Court Farm, near Burrington	0.66	Outside any area of search
HE2091	Between River Yeo and Weston Road, Congresbury	7.0	Outside any area of search
HE20110	The Vale, southwest Bristol	290.4	Edge of Bristol
HE20125	Land east of Clevedon	199.7	Clevedon
HE20136	Land to the north of Nailsea	25.1	Nailsea and Backwell
HE20195	East of Riverside, Banwell	4.8	Banwell
HE20222	Moor Farm, Portishead	36.1	Portishead
HE20303	East of Brinsea Road, Congresbury	6.9	Congresbury
HE20331	Old mushroom farm, Gatcombe Farm, Wrington	3.1	Outside any area of search

HE20471	Rose Tree Farm, North of Lower Norton Lane/Lyefield Road, Weston super Mare	3.6	WSM
HE20549	Old Mill Road Portishead urban area	5.2	Outside any area of search
HE20603	East of Wolvershill Road, Banwell	13.3	East of WSM
HE20496	Land east of J21	154.5	East of WSM
HE20500	Land adjacent to M5 and Summer Lane	41.4	East of WSM
HE202011	Land south of Nailsea (site overlaps with much larger HE20492)	14.48	Nailsea and Backwell
HE201013	Land off Says Lane	2.9	Churchill Langford
HE201020	Downs Farm, Dundry	21.9	Outside any area of search
HE201021	Land off Bridge Road	6.2	Bleadon
HE201023	Land off Stock Lane, Langford	7.2	Outside any area of search
HE201030	Leighton Crescent	2.7	WSM
HE201041	Land at Downside Road, near Bristol Airport	0.5	Outside any area of search
HE201043	Birds farm, land south of Winford	2.3	Outside any area of search
HE201071	Moor Lane	2.2	Nailsea and Backwell
HE201072	North of Brockley Way	6.8	Yatton
HE201073	Tyntesfield Springs	4.1	Outside any area of search
HE201074	North of Pudding Pie Lane	2.4	Churchill Langford
HE201076	Dunsters Road	1.7	Yatton
HE201077	North of Wrington Mead	1.9	Congresbury
HE201078	North of Youngwood Lane	3.6	Nailsea and Backwell
HE201081	North of New Road, A38 near Bristol Airport	20.1	Outside any area of search
HE201082	East of Lye Cross Farm, A38 near Bristol Airport	13.9	Outside any area of search
HE201083	Bakers Lane, near Stock Lane, north of Langford	11.1	Outside any area of search
HE201049	North of Eastermead Lane, east of J21, M5	16.2	Outside any area of search
HE201050	Western Trade Centre	1.2	Banwell

HE201053	Woodview Terrace, WSM urban area	0.2	Outside any area of search
HE201056	Goding Lane	1.6	Banwell
HE201057	East of Riverside, north of Banwell	5.5	Outside any area of search
HE201055	Eastermead Lane	10.7	Banwell
HE201067	North of Locking	2.9	WSM
HE201098	Chapel Pill, Easton-in-Gordano	188.5	Outside any area of search
HE2010107	Land around Failand	39.8	Outside any area of search
HE2010111	Sites at Parklands Village	13.2	WSM
HE202012	Land east of Backwell	46.1	Nailsea and Backwell

Appendix 3: ELSNA recommendations and translation into local plan policy

ELSNA Recommendation	North Somerset Reg 18 Local Plan policy response
Protection of Existing Employment Stock	<ul style="list-style-type: none"> • Designation of key sites/areas • Blanket proposed policy (DP20) equivalent to existing Site Allocations Plan (2018) SA4 that has presumption against loss of all existing business sites across E(g), B2, and B8 use.
Identify Additional Land Supply	<ul style="list-style-type: none"> • New sites identified in line with spatial strategy – see draft local plan Schedule 2 • Extant allocations proposed retention
Maximising Use of Existing Stock	<ul style="list-style-type: none"> • Policies to support intensification/ redevelopment/ repurposing especially to meet emerging and priority sectors
Meeting Emerging Premises Requirements	<ul style="list-style-type: none"> • Tailor land allocation to meet emerging requirements • Target specific sectors with type-specific allocations allowing the minimum forecast land requirements to be met
Locational Principles to Prioritise	<ul style="list-style-type: none"> • Identify allocations where there is likely to be greatest demand, maximising scope for delivery, reflecting evidence in ELSNA and ELR 2018 • The draft local plan considered these areas to be well-related to main urban areas, the strategic road network and public transport infrastructure. • There are locations being promoted for commercial growth that are close to the M5 e.g., land east of J20, however in many cases these are greenfield sites within the flood zone and at this stage

	are not included within the plan.
Flexibility in Policy Development	<ul style="list-style-type: none"> • Provide a flexible policy framework that reflects the way business operate and use land and space. • Consider some flexible allocations • Potential for LDO, SPD and other policy/ guidance tools to assist flexibility. • Ensure a range of sites are provided to meet a range of business opportunities.
Ongoing Monitoring of Supply and Demand	<ul style="list-style-type: none"> • Embed existing monitoring arrangements and review evidence over time particularly across the following indicators: <ul style="list-style-type: none"> • Number of jobs provided and sector change, • Locational distribution of commercial development • Self-containment and levels of out-commuting