



POSITION STATEMENT of the South Downs National Park Authority

Matter 5 – Employment Land

DATE: October 2018

Are the numerical provision of Policy SD35 for a total of 10.3 hectares of new employment land adequate and supported by robust evidence?

KEY DOCUMENTS for cross-reference

- National Planning Policy Framework (2012) (Nat 01)
 - South Downs National Park Housing and Economic Development Needs Assessment (HEDNA) (2017) (TSF 08)
 - Employment Background Paper (2017) (TSF 28)
 - Employment Land Review (ELR) (2015) (TSF 29)
 - Employment Land Review Update (2017) (TSF 30)
 - Representation on the Pre-Submission South Downs Local Plan by GVA instructed by Whitehill and Bordon Regeneration Company (WBRC) on behalf of the Defence Infrastructure Organisation (DIO) (Representation can be read in full [here](#) and the comment ID is 1972)
-

1. Introduction

1.1 This Position Statement has been prepared by the South Downs National Park Authority (SDNPA) on draft Policy SD35: Employment Land in order to address the representation on the Pre-Submission South Downs Local Plan submitted by GVA instructed by Whitehill and Bordon Regeneration Company (WBRC) on behalf of the Defence Infrastructure Organisation (DIO). The purpose of this Position Statement is to confirm that the numerical provision of draft Policy SD35 for a total of 10.3 hectares of new employment land is adequate and supported by robust evidence.

2. Is the numerical provision of Policy SD35 for a total of 10.3 hectares of new employment land adequate and supported by robust evidence?

2.1 The employment land provision figure set out in draft Policy SD35: Employment Land is supported by robust evidence that is 'adequate, up-to-date and relevant' in line with paragraph 158 of the NPPF and consistent with the previous Planning Practice Guidance¹ (PPG) on Housing and Economic Development Needs Assessment. The evidence on employment land in the National Park is set out in three evidence based studies and summarised in the Employment Background Paper.

2.2 The Employment Land Review (ELR) was prepared by GL Hearn on behalf of the SDNPA to support the Preferred Options Local Plan published for Regulation 18 consultation in 2015. Section 7 of the report considers and quantifies the future demand for employment land in the National Park in three separate ways. All three approaches demonstrate a relatively consistent level of employment land demand in the National Park.

2.3 Firstly, the ELR labour demand/ economic forecasts calculated future growth in employment taking account of past growth in employment by sector and expected future performance of different sectors. The demand figure for additional employment land was calculated to be 2.3 hectares (Table 10). As the necessary datasets are not available for the actual National Park boundary the forecasting was done for the Wider South Downs Area best fitted to Mid Super Output Areas (MSOA). Paragraph 7.34 of the ELR explains that the employment need figure was then disaggregated based on the known number of people resident in the National Park against the known number of people resident in the Wider South Downs Area.

2.4 This contrasts with the approach taken by GVA set out in paragraph 3.7 of their representation, which states that their growth figure has been disaggregated from the proportion of each local authority area within the National Park. As most of the National Park is actually countryside with a low population density outside the towns and villages it is entirely erroneous to use the same standard disaggregation for employment demand that would be used in densely populated towns and cities.

¹ This now relates only to housing needs with no economic need guidance currently in place

- 2.5 This can be illustrated by the example of Brighton & Hove where 44% of the local authority area is covered by the National Park, but only 0.26 % of the local authority's population live in the National Park². It is clear that a disaggregation of need based on land area would see a much greater level of need to the National Park than one based on population. This is an entirely unreasonable position to take and assumes that the green fields of the National Park generate the same level of demand for employment land as the densely populated city of Brighton & Hove.
- 2.6 Secondly, the ELR calculated an alternative projection for future employment land requirements based on historic trends in employment floorspace delivery using five and ten year trends. This is based on development sites within the National Park and not the wider area. The likely additional demand for net additional employment was estimated to be between 2.1 and 11.9 hectares (paragraph 7.55).
- 2.7 Thirdly, the ELR drew upon a number of detailed and localised employment studies produced by local authorities covered by the National Park. Drawing these studies together identified a requirement for between 8 and 12 hectares of new employment land centred on Petersfield, Midhurst, Petworth and Lewes (paragraph 7.91).
- 2.8 Paragraph 7.93 of the ELR draws upon all three approaches to calculate employment land need and concludes that the requirement is for between 8 and 12 hectares. Draft Policy SD28: Employment Land of the Local Plan: Preferred Options set out a requirement of 7 to 8 hectares, which was at the lower end of the range need calculated in the ELR.
- 2.9 An ELR Update was prepared by the SDNPA and published in 2017. The purpose of this study was to provide updated, detailed information on the supply of existing and potential employment sites within the National Park and did not seek to update the employment need calculations. The ELR Update concluded that there was a core supply of 11.8 hectares of employment land, which was towards the upper range (12 hectares) for employment land need set out in the 2015 ELR.
- 2.10 The Housing and Economic Development Needs Assessment (HEDNA) was prepared by GL Hearn on behalf of the SDNPA to support the Pre-Submission Local Plan published for Regulation 19 consultation in 2018. The core element of the HEDNA was to update the calculation of housing and employment land need across the National Park. Section 10 of the report considers and quantifies the future demand for employment land.
- 2.11 The HEDNA updates the labour demand/economic forecasts from the original ELR and concludes there is a net need of 5.7 hectares of new employment land within the National Park (paragraph 10.23).
- 2.12 The HEDNA used a bespoke model which more accurately reflected the need for the National Park area than the 2015 ELR. It used smaller geographies and thus a more accurate match to establish the baseline position from which to apply

² Calculated using Census 2011 Output Area (OA) Population statistics (KS101EW), with OA inclusion based on a population weighted centroid method

the wider forecast growth. As a result the identified need figure of 7 to 8 hectares was identified.

- 2.13 The HEDNA also updated the trend based projections to provide a need figure of between 10.4 and 13.8 hectares (table 44). This is again relatively consistent with the range projected in the ELR. The HEDNA concludes that it would therefore be appropriate to plan for 10.4 ha of employment land over the period 2014-35 based on both the forecast methods (paragraph 10.43).
- 2.14 Draft Policy SD35: Employment Land of the Pre-Submission Local Plan states that the SDNPA will make overall provision for 10.3 hectares of new employment land between 2014 and 2033. This is based on the evidence provided in the ELR and the HEDNA. Paragraph 7.144 of the Local Plan explains that a sufficient supply of employment sites is available to meet the provision figures set in draft policy SD35 and table 7.7 sets out the three sources of supply.
- 2.15 Paragraph 7.143 of the Local Plan and paragraph iii of the ELR state that due to the difficulties of undertaking economic forecasts in a National Park, the employment need figures should be treated with caution and should be kept under review.
- 2.16 In contrast the representation from GVA forecast a need figure of 61.78 hectares, which is 56.88 hectares higher than the provision figure of 10.4 hectares in Policy SD35. This level of discrepancy is not within the margin of error highlighted in the Plan.

3. Longmoor Depot

- 3.1 GVA's initial approach to the SDNPA about Longmoor Depot was during the Pre-Submission consultation on the Local Plan in 2017. As it was part of a wider MoD Estate programme neither the SDNPA nor GL Hearn were aware of its imminent disposal. This made it impossible, to assess the site in the ELR or consider it for allocation in the emerging Local Plan.
- 3.2 On receipt of the representation, the SDNPA contacted GVA and requested a meeting. This took place in April 2018 and was attended by Margaret Paren (Chair of the SDNPA) and representatives from GVA, the Whitehill and Bordon Regeneration Company (WBRC) and the Defence Infrastructure Organisation (DIO). The DIO stated that the MOD intended to withdraw from the site totally by the end of 2018 in accordance with the document 'A Better Defence Estate, November 2016' and submit a planning application by the end of 2018. The SDNPA explained that it was too late to allocate the site in the Local Plan as it had not been submitted until Pre-Submission when major changes could not be made without a further round of consultation. All parties agreed to prepare as a matter of urgency a Statement of Common Ground (SCG) supported by a Vision Document/ Illustrative Masterplan. The SDNPA drafted the heads of terms for the SCG in May and an advanced draft of the document is currently with GVA for consideration.

3.3 The SDNPA recognises that Longmoor Depot comprises a significant brownfield resource and welcomes the opportunity to work with WBRG and the DIO to enable development to come forward on the site. Criterion 2(d) of draft Local Plan Policy SD25: Development Strategy is particularly relevant and relates positively to the redevelopment of Longmoor Depot:

‘Exceptionally, development will be permitted outside of settlement boundaries, where it complies with relevant policies in this Local Plan, responds to the context of the relevant broad area or river corridor, and: ... It is an appropriate reuse of a previously developed site, excepting residential gardens, and conserves and enhances the special qualities of the National Park.’

3.4 A key conclusion set out in the GVA representation is that the site is located within the ICT Triangle, which stretches between West London, Newbury and Portsmouth (paragraph 3.14). It should be noted that the socio-economic duty of national park authorities relates to the economic and social wellbeing of local communities within the National Park and not to the wider economy. There are a number of other available employment sites outside the National Park and within the ICT Triangle that could help deliver regeneration in neighboring communities, for example, the Enterprise Zone at Louisburg Barracks and the Enterprise Park at Budds Lane, which are both in Whitehill and Bordon.

4. Summary

- 4.1 This Position Statement confirms that the numerical provision of Policy SD35 for a total of 10.3 hectares of new employment land is adequate and supported by robust evidence set out in the ELR, the ELR Update and the HEDNA.
- 4.2 The GVA method of disaggregating employment need is erroneous as it is based on land area rather than population. It assumes that a green field in a National Park with the same area as an urban location also has the same need for employment land.