

**Gladman Developments Ltd**

**North Somerset Core Strategy Remitted Policies  
Examination Hearing Statement**

**Matter 6 – Employment-Led Strategy  
May 2016**



# **1 IS THERE ANY SIGNIFICANT RISK THAT THE CONSEQUENTIAL CHANGES TO THE POLICIES WOULD PRESENT ANY IDENTIFIABLE AND UNRESOLVED CONFLICT WITH ANY OF THE CORE STRATEGY'S EXTANT POLICIES?**

## **1.1 Context**

1.1.1 This statement addresses Matter 6 'Policies' in arguing that there is a significant risk that the consequential changes to the policies would present an identifiable and unresolvable conflict with the Core Strategy's extant policies, having regard in particular to the employment-led strategy of Policy CS20.

1.1.2 Policy CS20 sets out the employment-led strategy and seeks to provide at least 10,100 jobs over the plan period and requires 1.5 on-site Class B jobs to be provided per new dwelling both at Weston Villages and elsewhere across Weston-super-Mare on sites of 10 or more dwellings. Outside of the Weston Villages and on allocated sites, if on-site provision is not suitable, financial contributions will be sought towards economic development through the use of planning obligations.

1.1.3 The objective of the policy is explained as aiming to:

*achieve a more sustainable alignment between jobs and the economically active population across towns and villages in North Somerset. This seeks to increase their sustainability, self-containment, decrease out-commuting, provide for a range of local jobs and reduce carbon emissions from unsustainable car use. Priority will be given to the reuse of previously developed land and the safeguarding of sites in existing economic use.*

1.1.4 The reason for the employment-led strategy is a very good one, because as explained at §3.248 of the Core Strategy, North Somerset

*has suffered from low levels of economic activity in recent years compared to high levels of residential development. This has led to high levels of out-commuting, and unsustainable development and a key objective of the Core Strategy is to address this trend.*

1.1.5 Accordingly, it is a priority objective of the Plan to

*Prioritise employment growth throughout North Somerset to support greater self-containment, in particular by ensuring that in Weston-super-Mare housing development is delivered in step with employment growth, brownfield opportunities in Clevedon, Nailsea and Portishead are maximised, and that small and medium enterprises are supported. Support and promote major employers in North Somerset, such as Bristol Airport and Royal Portbury Dock, to ensure continued employment security and economic prosperity.<sup>1</sup>*

---

<sup>1</sup> Core Strategy, page 20

- 1.1.6 The “suitable alignment” referred to in Policy CS20 was between 14,000 homes and 10,100 jobs, although regard should be had to the explanatory text at 3.251 that explains the level of planned jobs would create a synergy between new homes and jobs, but would not itself address the existing imbalance, and that the backlog of approximately 4,000 jobs was also to be provided over the plan period:

*3.251 The report into the new North Somerset-wide housing requirement addressed the issue of the interrelationship between jobs and housing and recommended a target of 10,100 jobs 2006 – 2026. This does not address the existing imbalance between homes (or the economically active population) and employment opportunities which is a fundamental policy objective. Evidence indicates that there is an existing backlog of jobs in relation to housing which needs to be addressed over and above the 10,100 jobs target for the district as a whole if self-containment is to be improved. In the 2001 Census figures indicate that for Weston the shortfall between out-commuting and in-commuting was 3,388 jobs. Since then the situation has deteriorated given the amount of housing delivered and the weakness of the local economy. In addition, at Weston the employment opportunities are poor in respect of B class jobs (particularly offices and general industrial). The overall jobs target for North Somerset is therefore a minimum of 10,100 plus backlog at Weston which equates to about 14,000 jobs.*

- 1.1.7 It is obvious that an additional 7,000 homes will have a significant impact on the number of jobs that are required to be delivered, if the balance that the Core Strategy sought to secure is to be maintained. As a matter of logic, and having regard to the emphasis of the Core Strategy, 10,100 jobs cannot be an appropriate requirement for 14,000 homes, **and** 21,000 homes. In fact, the jobs required would be more like 15,000 on a simple factoring up, and adding the backlog, would be around 19,000.

- 1.1.8 Interestingly, the Council shared similar concerns and initially argued before the examination into Policy CS13:

*“16...that a housing requirement significantly greater than the 17,130 dwellings specified in the MM1 version of Policy CS13 could be inconsistent with the employment-led approach which underlies the spatial strategy of the adopted part of the Core Strategy...”<sup>2</sup>*

- 1.1.9 It’s later modified position (accepted by the Inspector) was that<sup>3</sup>

*“7. The Council has concluded that a higher dwelling requirement than the 17,130 remains broadly consistent with the extant employment-led approach, although higher figures will increasingly dilute the effectiveness of the approach.”*

- 1.1.10 The Council regarded the “tipping point” at which the Core Strategy’s approach would become ineffective as 26,800 homes. However, just because 26,800 homes represent the tipping point where the policy would become completely ineffective, does not mean that anything up to 26,799

---

<sup>2</sup> North Somerset Council Core Strategy Development Plan Document, Inspector’s Report March 2015

<sup>3</sup> Appendix A of the Council’s Response to Inspector’s letter of 22 April 2014

---

homes is effective or appropriate, particularly when synergy between homes and jobs is a key plank of the Plan's Strategy, effectiveness, and its sustainability.

- 1.1.11 Interestingly, despite the synergy between homes and jobs being a crucial element of the development strategy, the Inspector reporting on the Examination into Policy CS13 found that "there are sound planning reasons for not seeking to equally match housing provision to the provision of employment in this case" despite considering that "the Council's general approach in respect of balancing jobs and housing to secure greater 'self-containment' is justified."<sup>4</sup>
- 1.1.12 Nonetheless, the inspector also made clear that he was considering Policy CS13 in isolation and that
- "if the plan provisions which I am considering are unsound, and if changes to make them sound cannot be accommodated within the adopted parts of the Core Strategy, then that inconsistency would be for the Council to resolve."*<sup>5</sup>
- 1.1.13 The Sustainability Appraisal in respect of the Core Strategy identified congestion on the strategic transport routes arising from the homes/jobs imbalance, particularly at Weston-super-Mare as a key/issue problem (page 6). Further, the SA was unequivocal that the employment-led strategy was a fundamental objective of the Plan, and crucial to its sustainability. However, it is clear that the greater the level of housing, the less effective the Core Strategy and Policy CS20 becomes at delivering the balance between jobs and homes, with implications for self-containment, out-commuting, and inevitably, the sustainability of the plan as a whole.
- 1.1.14 By the Council's own admission, the aims of Policy CS20 are 'diluted' by increasing housing to the level now planned for, and we contend, that is significant. However, the full impact cannot be known, because no further sustainability appraisal has been carried out, and no re-appraisal of the planned jobs growth as against the anticipated housing growth has been undertaken.
- 1.1.15 It might be said that policy CS20 is unconstrained by the housing figure, because it will continue to generate for example, 1.5 jobs per home over the plan period both at Weston Villages and elsewhere on sites of 10 or more dwellings in Weston-super-Mare. Accordingly, as the number of houses rise, so will the jobs that come forward.
- 1.1.16 However, there is no evidence currently before the Examination to demonstrate that the additional jobs can be delivered or accommodated over the Plan period. The impact being that the very issues the Core Strategy was designed to address will continue to effect North Somerset, and may lead to a worsening economic situation throughout the Plan period.

---

<sup>4</sup> North Somerset Council Core Strategy Development Plan Document, Inspector's Report March 2015 - para 49

<sup>5</sup> *ibid* at para 16

---