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SALEHURST & ROBERTSBRIDGE NEIGHBOURHOOD DEVELOPMENT PLAN December 2016

Examination by Mr Slater held at a Public Hearing on 28th September 2017

Question 5:

The Local Planning Authority has stated in its representations that is anxious to see some element of employment space within the Mill Site allocation. The Qualifying Body has stated that it is minded to agree to that? Is such a requirement necessary, and desirable? Are the provisions of paragraph 22 of the NPPF applicable to this site? This presumes against the long-term protection of sites allocated for employment uses unless there is no reasonable prospect of the site being used for that purpose” Is there a reasonable prospect of an employment use being provided if required by the plan policy?

Responses prepared by Courtley Planning Consultants Ltd on behalf of Devine Homes. September 2017

Question 5

5.1 Policy EC3: *“Employment retention”* of the SRNP proposes the retention of land and buildings in employment use unless the premises or land can demonstrate the ongoing use isn't viable. No Viability Appraisal has been submitted to this examination. Anecdotal evidence is suggested in Employment Land Report (Feb 2016) submitted on the Mill Site application RR/2017/382/P under para 5.4 *“No realistic prospect of Employment”*. The Montagu Evans report referred to in the report concludes that. *“The site was too remote from other centres of commercial activity to appeal to majority of potential occupiers in the industrial and office sectors.... Local commercial demand was demonstrated to be intermittent and generally from small business, operating out of low cost accommodation”* (page15)

5.2 The Mill Site proposes 1200sq m which is likely to be expensive employment space as evidenced in the Employment Land Report (ELR). This proposed employment space is 1000sq m less than was required by the RDC in their Pre-application stage i.e. 2000sq m. The ELR relies heavily upon the fact that the rural employment needs appear to have been met i.e.10,000 sq m across the rural area. Whilst they consider this employment target has therefore been achieved for the plan period it makes no assessment of current or future demand or the loss of employment space locally since 2006 and is therefore contrary to para 18 and 19 of the NPPF. The fact that they identify the target of 10,000 sq m as being met in only first 5 to 6 years of the plan period is more likely to suggest that a greater need isn't being met in rural areas over the remaining period of the plan.

5.3 We do however question the retention of the Mill Site as a suitable and sustainable location for employment especially when that provision is proposed in Flood Zones 2 and 3. Given the sites *“topographical challenges”* (par 5.3 ELR), the possible viability issues and the application of para 22 of the NPPF; the retention and delivery of employment space on this site is not justified, is ineffective and inconsistent with Government policy and should be deleted. No market evidence has been provided to show demand for employment space in Flood Zones 2 and 3. We understand the delivery of the employment space will require cross subsidy from the housing element which has already led to a complete lack of affordable housing provision. It is therefore reasonable to assume any reduction in housing numbers on site will inevitably lead to a reduction of employment provision, if not its complete removal.(see RDC Letter 20th June 2017 response to application RR/2017/382)

5.4 If the Mill Site has its employment provision removed this would still leave around 2000sq m of space required in the SRNP as requested by RDC pre application response. Policy EC7 *“Encourage employment”* (SRNP) offers no real means of addressing the future employment needs of the Parish or the wider rural area as it has made no SEA of potential alternative employment sites in the plan. If para 22 is appropriately applied then the delivery of employment on the Mill Site is unlikely. This would require an alternative employment site(s) to be identified. One that maybe suitable is the land south of Heathfield Gardens, Robertsbridge which has good connections to the A21 an important criteria identified in the Hasting & Rother Employment Strategic Review.

5.5 NPPF Para 17 bullet point 3 states that *“Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth”*. Policy EC3 and EC7 do not *“help achieve economic growth”* (NPPF para 20) and don't give *“significant weight on the need to support economic growth through the planning system”* (NPPF para 19).