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Dear Ms Watkins,

**PLANNING APPLICATION 65448: LAND NORTH OF A361, WESTACOTT, BARNSTAPLE
ROCKSPRING BARWOOD BARNSTAPLE LTD**

Savills write on behalf of Rockspring Barwood Barnstaple Ltd in relation to the pending planning application for a new community on the above site. This letter provides our comprehensive response in regard to the delivery of employment land on the application site.

The proposals for the application site have been considered in light of the allocation policy (BAR01), with regard to the subsequent detailed site assessments, and are underpinned by the vision for the new neighbourhood:

“The development at Westacott will deliver a new community with a distinctive sense of place and character within a network of multi-functional green and blue infrastructure. It will be an accessible place with a neighbourhood hub at its heart, forming a new gateway to Barnstaple.”

The application site is delivering the vast majority of the allocation policy – alongside land for economic development, it is delivering the new primary vehicular access from the A361, the 420-place primary school, a community centre, neighbourhood hub, open space, land for park and change facilities, and residential development.

The submitted planning application includes the delivery of 2.18ha of land for economic development; in addition to a 1.7ha site for a new primary school. The development will result in the creation of between 488-546 operational full time equivalent (FTE) jobs on the site; in addition to between 116-128 FTE jobs in the local economy.

Application Site: Employment Land Opportunities

The original rationale for the allocation of land for economic development at Westacott was to enable an extension to the Whiddon Valley Industrial Estate. Indeed, the decision to allocate 5ha of employment land to the Westacott allocation can be traced back to the Northern Devon Employment Land Review (ELR) by GL Hearn (December 2013). The ELR, a key component of the Local Plan evidence base, assessed the existing employment locations and potential opportunities for delivering additional employment floorspace in order to meet the projected need.

The review of existing employment sites in North Devon (within the table on page 35 of the ELR) explains the positive merits of the existing Whiddon Valley Estate. Based upon this it concludes that “*expansion*

opportunities were evident to the east, and this has been recognised in the emerging Local Plan, with employment proposed as part of a new urban extension to Barnstable“.

The ELR then moves on to assess the employment allocations proposed in the draft Local Plan where, on pages 45-46, it reviews the proposed 10ha employment land allocation within the Westacott Strategic Extension. Here it reiterates that *“it is proposed to site the employment/business area next to the Whiddon Valley Estate as an extension to that area. Access from Castle Park Road, via existing industrial estate or direct from Westacott Road itself“.* The assessment goes on to state that *“we would question the level of employment land to be provided in this location within the Plan period“.*

Section 6 of the ELR contains the conclusions. The overall conclusion for Barnstable at paragraph 6.16 is that the draft Local Plan had over allocated land for employment purposes with the report stating that *“it is difficult to see delivery of 48 ha of employment land taking place over the plan period to 2031 in Barnstable“.* In commenting upon each of the proposed employment allocations in turn, it is clearly evident from the report that employment growth should be focused at those locations where there is an opportunity to expand an existing employment area.

Specifically in relation to Westacott, paragraph 6.20 of the ELR states that *“based on the demand evidence, we are also concerned about the deliverability of additional proposed employment allocations elsewhere in the town which are less well located in regard to existing employment floorspace and the strategic road network. There may be a case for a modest extension to the Whiddon Valley Industrial Estate as part of the delivery of the Westacott Urban Extension, but if this is taken forward it would be appropriate to review the scale of land allocation along the A39 (focusing towards the lower end of the range set out in the paragraph above)“.* The employment allocation within the Westacott Strategic Urban Extension was consequently reduced to 5ha, however it was clearly evident throughout the various references within the ELR that this scale of employment land was predicated upon it forming an extension to the existing Whiddon Valley Industrial Estate.

At the time the plan was prepared there was no reason to believe that this would not be achievable. The environmental and technical assessment work undertaken to inform the preparation of the Local Plan did not enter into such a level of detailed assessment that it would have been able to establish whether an extension to the Industrial Area would be possible, nor would it have been expected to as part of the plan-making process.

However, the detailed environmental assessments undertaken as part of the planning application process have subsequently revealed that it was not possible to deliver an extension to the existing Industrial Estate without causing significant environmental harm.

The masterplanning process therefore considered alternative locations for the delivery of employment land within the allocation area. Based upon a detailed understanding of the environmental constraints of the site and, equally importantly, the commercial requirements of future occupiers, it was decided that the on-site employment could best be achieved by combining a high quality ‘gateway’ employment area with mixed employment floorspace along the spine Road adjacent to the Neighbourhood Hub. The design rationale for this is explained in the DAS addendum (see page 35).

Whilst an extension to the Whiddon Valley Industrial Estate would logically have comprised similar uses to the existing single-storey industrial and trade counter occupiers, such a form of employment would not produce an attractive and desirable gateway to the new community and to the town as a whole. This is crucial

to the success of the development and an aspiration shared with the Council. Instead, an alternative form of employment is required; one which is appropriate to the 'gateway' location. The employment proposed within the application is not only more suitable to the environment and location than single-storey industrial and trade-counter uses but because the employment density is higher, it will provide more jobs than the equivalent area of single storey employment. The extent and type of employment proposed within the application complements the employment provision elsewhere within the authority area and, very importantly, will achieve a high quality 'gateway' to the town.

Consideration has been given to whether the 'gateway' employment area could be expanded to cover the 5ha sort through the policy. The reasons it has not are both qualitative and quantitative. These are explained below:

First, the proposals include a range of land for economic uses, as part of the business park, neighbourhood hub and as part of the mixed use area along the spine road. It is not considered that there are any further locations within the application site for the delivery of land for economic development without significantly comprising the delivery of a high quality new community.

The expansion of the proposed employment area to the west at the 'gateway' to the application site has been referenced, however this is not considered to be an appropriate response to the site and would be detrimental to the residential environment and design quality. There is a clear logic to the current distribution of uses at the eastern edge; with the employment to the east of an existing hedgerow which has been identified as a Dark Corridor in the submitted planning application, and will be sensitively retained as a 'Wildlife Hop Over' (see Framework LEMP). This green infrastructure link provides the mitigation for the provision of the vehicular access through the Coney Gut at the proposed site entrance. This provides a natural barrier with the residential uses proposed to the west, and a clear, distinctive and legible gateway to the residential area to be delivered in this location. The expansion of the employment area into this field, would result in the new community's entrance being an extended business park which wouldn't deliver a high quality, distinctive and legible community gateway.

In response to this, and through discussions at the Design Review Panel, the application proposals include areas of mixed-use employment and residential, both within the Neighbourhood Hub and alongside the spine road, which are jointly located within the central element of the development – reflecting the intention to create a focal area for the community. This reflects Policy DM13b)ii) which requires consideration to be given to opportunities to deliver mixed-use on a site.

Second, the allocation area was reduced in size during the Local Plan examination process to remove land between the eastern boundary and Acland Road. Had this land been retained, as was envisaged in the submitted Local Plan, it would have been feasible to extend the 'gateway' employment area to the north. Should this land be made available in the future, it would be entirely possible to expand the employment area accordingly and in the manner which would not compromise the high quality of the development.

Third, for the reasons explained in detail at paragraphs 3.28-3.55 of the Planning Statement Addendum (April 2019), the assumptions used in converting the floorspace need to land area in the Employment Land Review are predicated on the employment being delivered in the form of single storey buildings. Whilst this may be appropriate for some B-class employment uses, it is not the case for the form of employment proposed as part of the planning application; the form of employment considered appropriate to the application site for the reasons set out above.

Whilst a smaller land area is envisaged than is in the policy, this will not dramatically reduce the overall floorspace. With the employment buildings in the 'gateway' area at 2-3 storeys it stands to reason that less land is required to accommodate a similar quantum of floorspace.

Fourth, and a crucial consideration, is the impact that additional employment land would have on the viability of the development as a whole. The conclusions of the Viability Assessment (September 2019) produced by Turner Morum on behalf of Barwood Land concludes that, even with 0% affordable housing, the proposed development is considered non-viable. Whilst my client is prepared to proceed with a proposal for 10% affordable housing despite the c. £8.75m deficit and reduced developer profit that would result against industry accepted parameters in this instance to see the development proceed, any further increase in development costs or loss of developer profit could not be reasonably justified.

The current development proposals maximise the extent of the net developable land within the allocation area and any increase in the employment land would only be achievable if there was a commensurate reduction in the land for residential development.

Planning Balance

The application proposals fully address the vast majority of the allocation policy requirements. Alongside land for economic development, the proposals deliver the new vehicular access from the A361, the primary school, community centre, neighbourhood hub, substantial open space, land for park & change facilities and residential development.

The 'deficit' against the Allocation Policy's "*approximately 5ha*" of land for economic development must be weighed in the planning balance. In so doing, the following are important considerations:

- The Allocation Site was reduced by 12.5ha through the Examination process, with no associated change to the overall allocation policy requirements. The land to the east whilst removed from the Allocation Site is retained within the Development Boundary, and as such, could come forward for employment development under Policy DM11. The application site secures safeguarded vehicular, cycle and pedestrian links to this area to support its future delivery;
- The original intention of the allocation of land for economic development was the expansion of the Whiddon Valley Industrial Estate. Further technical assessment has demonstrated that this is not achievable;
- The application site delivers B1a and B1b Use Classes within a high quality, modern scheme which responds to the Local Plan aspirations to deliver high value employment for a range of users, including medium and start-ups, and establishes a new gateway to the new community and Barnstaple;
- The employment proposals for the site are delivered across a range of facilities including the Neighbourhood Hub, business park and within a distinctive mixed-use area along the spine road;
- The application site is not an appropriate location for the delivery of Use Class B2 and B8 – reflecting the objective to create a high quality, distinctive and legible new community, and to ensure an appropriate relationship between the various uses;
- The shortfall of land for economic development would not compromise the delivery of the strategic economic aspirations for Barnstaple, and northern Devon. The requirements for sq m for B1a and B1b have been met through recent committed development, and there is an appropriate policy mechanism available to deliver further employment land for other uses in more appropriate locations within the town; and

- The loss of residential development from the planning application proposals would further undermine the viability of the submitted scheme, and would significantly compromise its deliverability. A Viability Assessment (VA) has already prepared which identifies the substantive viability issues affecting the application proposals.

The 'deficit' of land for economic development should be read against the above material considerations and, within the planning balance, is in our view outweighed by the wider benefits associated with the delivery of the application site as set out in the Planning Statement and associated Addendum. The application proposals will deliver the substantive elements of the new community, including the primary vehicle access, community building, neighbourhood hub, new primary school and the park and change facilities, alongside significant open space and residential development. These will be delivered within a high quality, distinct new community.

Should you have any queries regarding the above please do not hesitate to contact me.

Yours sincerely,



Nick Matthews
Director