

## Policy CS13 – Employment Land Requirement

Summary of Comments Received	Recommended Response
It is unclear whether paragraph 19.8 is equivalent to the "very special circumstances" that must be applied to applications for inappropriate development in the Green Belt under national policy.	Accepted. It is recommended to amend the reasoned justification by deleting paragraph 19.8 which currently states "The Council has resolved that only a redevelopment opportunity of exceptional economic and employment significance would be considered in the Green Belt, because of the potential to accommodate significant levels of higher density development in and around Wirral Waters and Birkenhead Town Centre."
Development of 'exceptional economic and employment significance' should be better defined as this will allow the Green Belt to be allocated for development without defining precisely in what circumstances this might happen.	Accepted. It is recommended to amend the reasoned justification by deleting paragraph 19.8 which currently states "The Council has resolved that only a redevelopment opportunity of exceptional economic and employment significance would be considered in the Green Belt, because of the potential to accommodate significant levels of higher density development in and around Wirral Waters and Birkenhead Town Centre."
The Wirral Employment Land and Premises Study (ELR) considers a range of methodologies for predicting economic growth and land requirements over the plan period. The ELR however does not identify a preferred approach and Policy CS13 appears to take a position at the top end of the range presented without sufficient justification or analysis, calculated to reflect the policy on position of the 2007 Wirral Investment Strategy. The ELR does not reflect the latest Investment Strategy dated 2011. The 2007-based figures pre-date the current economic climate and do not take into account the impact of the recession. The additional 55ha associated with delivering the Investment Strategy, cannot be found within the Investment Strategy and the methodology for reaching this number is not set out within the original ELR or the 2012 Update. The 2007-based requirements are added to historic take-up rates to form the top end of the range of requirements within the ELR. It is inappropriate to assume that future employment land requirements will follow the scale and pattern of historic development within Wirral and do not reflect the current requirements of businesses or market constraints including access to finance. The ELR presents no analysis of these historic take-up rates before identifying it as the appropriate basis for policy. The 2012 Investment Strategy notes the need to address quality and quantity issues in the employment land supply and prioritises key sites which do not include Moreton.	The Wirral Employment Land and Premises Study recognised that historic take-up rates are a better reflection of the actual demand for land in Wirral and recommended that a further allowance was made to account for the needs of the Council's Investment Strategy. The use of historic take-up rates is considered to be a robust and flexible approach as data for the last 15 years takes account of the full economic cycle. Work to update the allowance for the needs of the Investment Strategy, reported to Cabinet on 27 September 2012, is now complete and indicates a revised additional requirement of 36ha, compared to the 53ha previously applied, based on the earlier analysis contained within the Wirral Enterprise Strategy 2007. It is therefore recommended to amend Policy CS13 to read: "A minimum of <u>200</u> ha of land will be required to accommodate new employment development for B1, B2 and B8 uses..." It is also recommended to amend paragraph 19.2 to read: "The Council's Enterprise Strategy originally estimated that raising the Borough's economic activity and business stock towards the regional average would require an additional 55 hectares of land to be developed by 2016. The latest calculation indicates that this figure should now be approximately <u>36</u> hectares."

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<p>Paragraph 19.6 refers to “High scoring sites, close to main roads and in high profile locations...at Moreton...” The allocated site immediately adjacent to the Burtons Foods site scored 4/10 for M53 road proximity, prominence and market availability. Tarran Industrial Estate scored 6/10 for M53 road proximity and 3/10 for prominence and market availability. There is therefore no evidence to support the conclusion that Moreton contains high scoring and high profile sites and the specific references to Moreton need to be revised.</p>	<p>No change is recommended as Policy CS13 is not site-specific and states that the allocation of individual sites will be considered in a future site-specific Local Plan. References to Moreton refer to the employment area as a whole. The Moreton employment area is identified in the Employment Land and Premises Study as a Key Employment Area, “of a size to create presence and able to accommodate a range of uses”. Other factors than “M53 road proximity”, “site prominence” and “market availability” contribute to the overall market-led site score. In Wirral, market-led scores are generally poor, with only 20 sites (17%) achieving a score of 50% or more. Of these sites, 3 are located within the Moreton employment area (Site 8, Premier Brands – Reeds Lane, site 65, Premier Brands – Pasture Road, and site 251, Nextdom – Reeds Lane) and the Study recommends that all existing employment land in west Wirral (including Moreton) is retained (recommendation 7 refers). Policy CS17 – Protection of Employment Land provides for site specific assessments where evidence relating to need, marketing, land supply, land use and the character of the surrounding area can be taken into account.</p>
<p>The Core Strategy fails to recognise that investment and job creation needs to be adequately served by new homes in sustainable locations; not simply in Birkenhead.</p>	<p>No change is recommended because Policy CS13 is simply about quantifying the amount of land required for employment purposes over the lifetime of the Core Strategy. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need.</p>
<p>Object that only “redevelopment opportunities of exceptional economic and employment significance would be considered in the Green Belt” which should be amended to recognise the need to adopt a flexible approach to economic growth which does not seek to restrict employment uses and is more responsive to changing needs and demands and economic circumstances. Policy CS13 should reflect 'Strategic Objective 3 - Transport Accessibility' and promote new development in locations with easiest access to existing centres, high frequency public transport corridors, pedestrian and cycle routes.</p>	<p>No change is recommended to Policy CS13. It is recommended to delete paragraph 19.8 which states "The Council has resolved that only a redevelopment opportunity of exceptional economic and employment significance would be considered in the Green Belt, because of the potential to accommodate significant levels of higher density development in and around Wirral Waters and Birkenhead Town Centre." in response to other representations. The promotion of new employment development in sustainable locations is already covered in Policy CS2 – Broad Spatial Strategy, Policy CS15 – Criteria for Employment Development, Policy CS40 – Transport Requirements and Policy CS42 – Development Management and transport requirements will be considered when sites are allocated in a future site-specific Local Plan.</p>

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<p>Support the need to deliver 217 hectares of employment land but concerned at the potential to deliver this quantity of land from the existing employment land supply. The Wirral Employment Land and Premises Study shows that: 84 hectares of employment space is envisaged at Wirral Waters; 141 hectares is constrained for at least the medium term by a lack of servicing; only 5.14 hectares is immediately available for development; current commitments amount to only 3.46 hectares; 100.17 hectares may not come forward for new employment development, and there is very little property or land available to the west of the M53 Motorway. There is therefore a need for additional land to be identified in the Green Belt, without which the Core Strategy cannot be “positively prepared” or “justified” as the most appropriate strategy when considered against the reasonable alternatives.</p>	<p>No change is recommended. Although it is recommended that the latest figures for April 2013 should be included in the final Core Strategy, the reduction in the land required to meet the aspirations of the Wirral Investment Strategy, the overall amount of land currently available for employment uses, as shown in Table 19.1, and current market conditions are unlikely to justify the release of land from the Green Belt for additional employment development.</p>
<p>New employment development, especially on ‘green’ land, cannot be ‘sustainable’ when so many office/industrial units built in recent years are not occupied. A better assessment of need is required.</p>	<p>No change is recommended, as Policy CS13 seeks to define the minimum land required to provide a flexible range and choice of sites and to raise the Borough's business stock and economic activity towards the regional average, which will be allocated in a future site-specific Local Plan and the amount of existing vacant property has been taken into account in the calculation of the additional land requirement associated with the delivery of the Investment Strategy.</p>
<p>It is not clear how the overall scale of provision identified in Policy CS13 will be distributed across the different Settlement Areas.</p>	<p>No change is recommended, as detailed development scenarios have already been provided to the respondent, to allow the consideration of appropriate infrastructure requirements and the respondent does not currently have any concern regarding the soundness of the Core Strategy.</p>
<p>Further clarification is needed on the level and type of employment development expected within the Dock Estates. Un-related employment uses should not be supported and operational port land within the Dock Estates should not form part of the Council’s overall general employment land supply, to ensure that this land is retained in port and port related use as a specialised area of the sub-regional economy and as a driver of growth.</p>	<p>It is recommended that Policy CS14 is amended to delete the text “including land within the Dock Estates” from the first paragraph. It is, however, for port operators to restrict un-related employment uses within the designated Dock Estates. Operational port sites will continue to be included within the Borough’s employment land supply because the calculation of future employment needs has included future port-related employment; port sites represent 26% of the current land supply (67.58 ha) and 10% of sites numerically; and the Wirral Employment Land and Premises Study Update (2012) recommended that they should continue to be included as part of the Borough’s employment land supply.</p>

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<b>Summary of Comments Received</b>	<b>Recommended Response</b>
Table 19.1 should be amended to refer to 'Dock Estate Sites' rather than 'Port Sites'.	Accepted. It is recommended that Table 19.1 is amended to refer to 'Dock Estate Sites'.