

Area North Committee – 22 February 2012

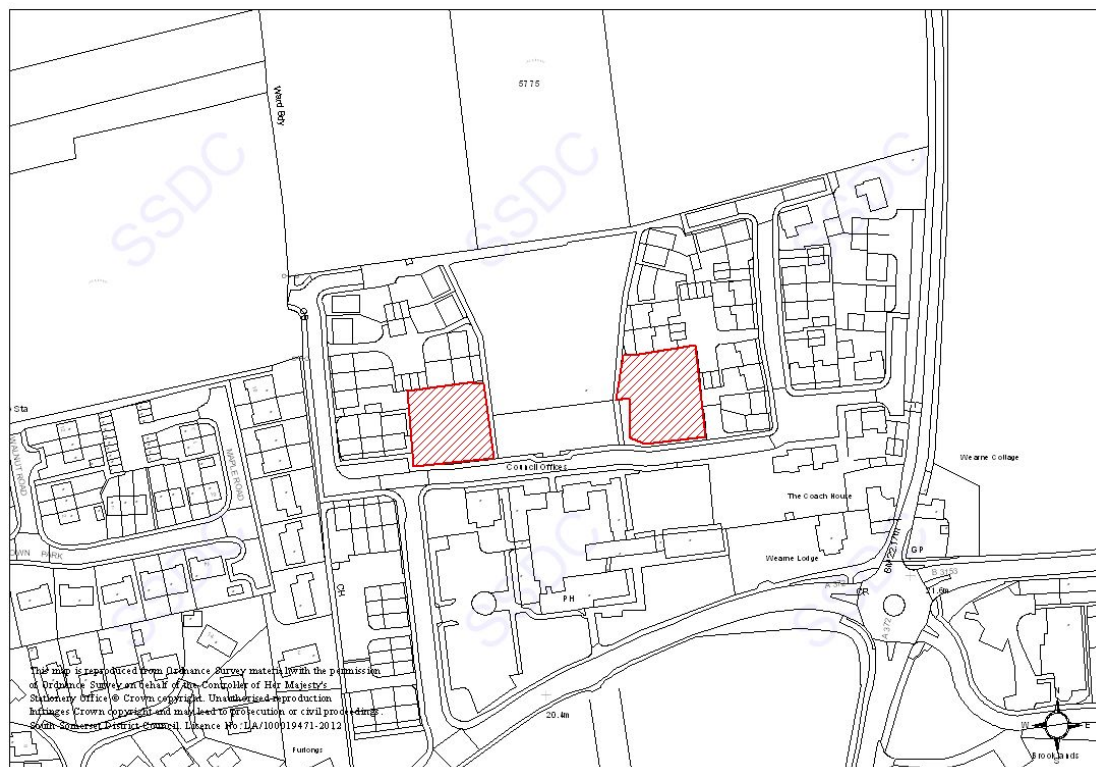
Officer Report On Planning Application: 11/03832/FUL

Proposal:	Erection of 9 dwellings (Plots 53-61) in lieu of approved Employment Units B and C (Revised Scheme) (GR: 342562/127643)
Site Address:	Land At Old Kelways, Somerton Road, Langport
Parish:	Huish Episcopi
TURN HILL Ward (SSDC Member)	Mr S Pledger (Cllr)
Recommending Case Officer:	Adrian Noon Tel: 01935 462370 Email: adrian.noon@southsomerset.gov.uk
Target date:	17th November 2011
Applicant:	C G Fry & Son Ltd
Agent: (no agent if blank)	
Application Type:	Minor Dwellings 1-9 site less than 1ha

REASON FOR REFERRAL TO COMMITTEE

This application is referred to the Committee with the agreement of the ward member and Chairman to enable the issues raised by the town council and Economic Development/Area Development officers to be fully debated.

SITE DESCRIPTION AND PROPOSAL



These 0.19 hectare sites forms part of a wider 3.6 hectare site approximately 1 kilometre to the east of the centre of Langport, on the A372. This comprises the walled curtilage of

Kelways, a Grade II Listed Building and former plant nursery, which used to provide the Council's Area North offices (now vacant) as well as an adjacent public house with hotel and other independent office/retail facilities. The whole site is outside the settlement boundary.

There are residential properties to the west, separated by a well-established hedge, comprising a two storey house fronting on to Somerton Road and the rear gardens of bungalows fronting Maple Road. The northern section of that boundary adjoins land allocated for residential development in the Local Plan (HG/HUEP/2), which is currently subject to an application (11/03541/FUL) by the same applicant.

The northern boundary comprises a high stone wall with tile capping, beyond which is farmland. Attached to the wall is a listed water tower. The eastern boundary is also marked by a high stone wall with an opening to the north - east corner. The southern boundary is open, facing onto the existing buildings at Old Kelways.

There is an approval (09/02917/FUL), now substantially implemented, for a mixed used development of:-

- 52 storey dwellings
- 996m² of B1 office space to the rear of the existing building group (E2 and E3);
- 202m² of retail space to east of existing shop (E1);
- additional hotel space (10 rooms) to rear of existing accommodation;
- associated parking
- access improvements to A372, including widening of entrance and provision of turn right lane;
- cycle/pedestrian access to Wearne Lane
- central area of public open space (POS), including a LEAP, to the rear of the former council offices

The employment element was included at the specific request of Area North Committee. An associated section 106 agreement delivers:-

- affordable housing
- contributions to the provision of open space, landscaping and play areas
- contributions towards off-site highway works, including the provision of a right-turn lane into the site on the A372, contributions towards "Safe Routes to School" and towards junction improvements at the A372/B3153 junction
- contributions towards improvements to Huish Episcopi secondary school

This application seeks to substitute 9 two-storey dwellings for two of the previously approved employment areas (E2 and E3). These would be located either side of the central area of POS and comprise on the eastern side:-

- 2 pairs of semi-detached dwellings (3 bedrooms)
- A 3-bedroom house.
- A single storey car port
- 10 parking spaces

and on the western side:-

- A pair of semi-detached dwellings (2 bedrooms)
- A 3-bedroom house.
- A 2-bedroom house
- 7 parking spaces

The proposal is supported by a Design and Access Statement and a Planning Statement that includes a marketing report and an appraisal of the availability of employment space in the area. Heads of terms are provided for a S106 agreement to cover affordable housing and sports, arts and leisure contributions.

HISTORY

07/03534/FUL	Erection of 52 dwellings, B1 office space and extension to hotel. Approved 18/09/08
09/02917/FUL	Erection of 52 dwellings, B1 office space and extension to hotel (alternative scheme). Approved 27/08/10, now implemented.
09/02935/LBC	Consent granted for alterations to water tower and boundary wall.
10/03641/S73	Application approved to vary conditions 14 (timing of delivery of play area) and 18 (timing of works to water tower).

POLICY

Section 38(6) of the Planning and Compulsory Purchase Act 2004 repeats the duty imposed under S54A of the Town and Country Planning Act 1990 and requires that decision must be made in accordance with relevant Development Plan Documents unless material considerations indicate otherwise.

For the purposes of determining current applications the local planning authority considers that the relevant development plan comprises the saved policies of the Somerset and Exmoor National Park Joint Structure Plan Review, and the saved policies of the South Somerset Local Plan.

Somerset and Exmoor National Park Joint Structure Plan

STR1 - Sustainable Development
 Policy 9 – The Built Historic Environment
 Policy 39 - Transport and Development
 Policy 48 - Access and Parking
 Policy 49 - Transport requirements of new development

South Somerset Local Plan (Adopted April 2006)

ST1 - Rural Centres
 ST3 - Development Areas
 ST5 - The Quality of Development
 ST6 - Landscape and Architectural Design
 ST10 - Planning obligations
 HG1 - Provision for New Housing Development
 HG6 - Affordable Housing Target
 HG7 - Site Targets and Thresholds
 EH5 – Development Affecting the Setting of Listed Buildings
 EH12 – Archaeology
 EC3 - Landscape Character
 CR2 - On site Outdoor Play and Amenity Space
 CR3 - Off site provision of Outdoor Play and Amenity Space

TP1 - Pedestrian Provision
 TP4 - Road Design
 TP7 - Car Parking
 ME6 - Retention of Employment Land
 ME7 - Retention of Employment Land in the countryside
 Policy EU4 - Drainage
 EP5 – Contaminated Land

Policy-related Material Considerations

Employment Land Review 2009 -2010:-

“It is arguable that the Langport/Huish area is similar in respect to Somerton, with an active local business community and a range of employment premises. However, it is on the “cusp” in terms of size, as demonstrated by the presence of a Tesco foodstore on the outskirts of the town centre. From our perspective there appears to be limited substantial commercial demand for new employment land. However, accepting the intermediate size of the area and its strategic significance within the north west of the District, it may still be appropriate to allocate some additional land within the area for future employment purposes. To this end, we consider that a nominal allocation, providing a rolling supply in the order of 0.125 to 0.25 hectare at any point should suffice to meet this need.”

National Guidance

PPS4 – Planning for Sustainable Economic Growth - Policy EC12 advises that when considering planning applications involving the loss of economic activity, the impact on the supply of employment sites and premises and the economic, social and environmental sustainability of the area, should be taken into account.

CONSULTATIONS

Huish Episcopi Parish Council – recommends refusal. It is noted that the original residential application was rejected by the District Council as it was considered essential to retain some commercial interest on the brownfield site. The subsequent high quality schemes was supported. The PC note a large number of unoccupied houses currently on site, however the also consider the amount of light industrial development in the area to be extremely limited. At least one of these sites should be developed as small industrial units.

Langport Town Council – recommend refusal on the grounds of loss of potential employment space and a concerns over the marketing of the facility before it has been completed – *“while the area is still a building site [it] is never likely to be very successful and the applicant must have assessed the potential for this area of the development when submitting the original plans”*.

No concerns are raised over the style of the houses subject to review of parking and hardstanding provision is approved.

Wessex Water – not objection subject to agreement of surface water drainage which should not enter the foul system.

County Highway Authority – no objection subject to safeguarding conditions.

Policy Officer – advises that the impact on the supply of employment sites/premises and the economic, social and environmental sustainability of the area should be

considered. Some questions about the marketing are raised with regard to price and comparisons with other sites in Langport are raised and in this respect it is suggested that the advice of Economic Development and Area Development is sought. If it is deemed that the marketing has not been undertaken correctly, then the application should be refused.

Economic Development Manager – objects, noting that this site has enjoyed sustained employment use and remains an excellent site for employment in Langport. It is considered that:-

“...in the current economic climate it is not difficult to demonstrate marginal viability by using high development costs and low income projections. This only offers a short-term view of this site and a short-term view of economic appraisal that should not over-ride a prudent longer term strategic planning view. Our Core Strategy projects a 15 year view of the District, and historically South Somerset has done well over longer economic cycles (with around 20,000 jobs created in the District 1988-2008). This request to change the employment allocation to dwellings is based on the here and by accepting the applicant’s request we would weaken our ability to defend the workspace allocation in the Core Strategy.”

A full copy of these comments are attached at Appendix A.

Area Development Manager (North) – objects on the grounds that:-

- *The applicant has not justified that the employment units as part of the approved plan, are no longer relevant to the long-term sustainability of the local area.*
- *The applicant has not demonstrated sufficient marketing which would act as evidence of nil or low demand, to justify the loss of employment land to be replaced with residential.*

A full copy of these comments are attached at Appendix A.

Community Health and Leisure Manager – requests a contribution of £3,966.31/dwelling towards mitigating the impact of the development on sports, arts and leisure facilities.

Technical Services – no further comments.

Landscape Officer – no objection.

Open Spaces Officer – no objection.

Contaminated Land Officer – No objection.

REPRESENTATIONS

One objection received from a new resident of the development:-

- No objection to the approved single storey employment buildings (subject to normal controls), however 2-storey dwellings would obscure view;
- Affect of social houses on property value.

CONSIDERATIONS

The principle of the development of this site has been accepted. The design, layout and landscaping of the 9 proposed dwellings is considered acceptable and the scheme would not adversely affect the setting of the listed buildings or harm ecology. No objection has been received from technical officers with regard to drainage, land contamination, archaeology or highways safety and previously agreed access and drainage arrangements are considered suitable to meet the need of both the approved scheme and the additional residential units now sought.

Accordingly the proposal complies with policies ST1, ST3, ST5, ST6, HG1, EH5, EH12, EC3, TP1, TP4, EU4 and EP5.

The key issues therefore are the loss of employment land, the implications for residential amenity due to the introduction of 2-storey dwellings on this part of the site and planning obligations.

Loss of Employment Land

Historically this site has generated local employment opportunities. When its redevelopment was proposed it was considered important to retain an element of employment land as required by policies ME6 and ME7. This proposal to now lose these two employment sites (E2 and E3), retaining just the small E1 site (adjacent to the café) is considered to constitute the substantial loss of the employment potential of this site for a satisfactory justification must be provided as required by policies ME6 and ME7.

The applicant has provided details of the marketing of these sites, which they contend demonstrates that there is no commercial interest in developing this employment opportunity. This submission is challenged by the Council's economic and area development officers who consider that the promotion of this site, as an undeveloped site, to be built out speculatively or by an end user, has been flawed. In particular the vigour of marketing and the price have been challenged.

The Area Development Manager cites the success of other employment sites in the Langport area as evidence of demand and points to the coming of super-fast broad band and other factors that suggest to an up-turn in the market of the period of the Council's Core Strategy. The position is summed up by the Economic Development Officer who observes that:-

"in the current economic climate it is not difficult to demonstrate marginal viability by using high development costs and low income projections. This only offers a short-term view of this site and a short-term view of economic appraisal that should not over-ride a prudent longer term strategic planning view. Our Core Strategy projects a 15 year view of the District, and historically South Somerset has done well over longer economic cycles (with around 20,000 jobs created in the District 1988-2008). This request to change the employment allocation to dwellings is based on the here and by accepting the applicant's request we would weaken our ability to defend the workspace allocation in the Core Strategy."

Accordingly, and notwithstanding the evidence submitted with the application it is not considered that sufficient justification has been put forward to justify the loss of this employment site at this time. As such the proposal is contrary to policies ME6 and ME7.

Residential Amenity

The layout and orientation of the proposed dwellings would closely follow that of the approved commercial buildings. These included predominantly two storey structures in a very similar position relative to the surrounding dwellings. Accordingly it is considered that the physical relationship, in terms of light provision, outlook and dominance, is acceptable and the introduction of residential use is not considered problematic.

On this basis it is not considered that the proposal would be detrimental to residential amenity and would comply with policy ST6.

Planning Obligations

This site is clearly part of the development of a wider site and policy ST10 advises against piecemeal development to circumvent reasonable planning obligations. Accordingly, whilst the threshold for affordable housing is not technically reached it has been considered reasonable to seek 35% affordable housing as expected by policy HG7 and to request sports, art and leisure obligations as justified by policies CR2 and CR3.

The applicant is willing to provide for these obligations on the same basis as there are being sought on the adjoining allocated site (Newtown Park). This is considered reasonable and would comply with policies ST10, HG7, CR2 and CR3.

Conclusion

It is accepted that the applicant is willing to make provision for the necessary planning obligations and, in respect of design, amenity, landscaping, highways, relationship with listed buildings and impact on ecology and drainage, the proposal raises no issues that could not be addressed by condition. However these factors are not considered to outweigh the failure to demonstrate that the all reasonable efforts have been made to continue a substantial employment opportunity on this site. As such the proposal does not comply with policies ME6 and ME7 of the south Somerset Local Plan and the advice of PPS4.

RECOMMENDATION

Refuse planning permission

Reason

It has not been satisfactorily demonstrated that there is no demand for the approved employment units or that their loss would have no detriment impact on employment opportunities in the area. In the absence of such justification the loss of this employment opportunity would be detrimental to the economic sustainability of the locality contrary to saved policies ME6 and ME7 of the South Somerset local plan and the advice of PPS4.

Appendix A

Consultation responses of Area Development Manager and Economic Development Manager

Application No: 11/00894/FUL

Erection of 9 dwellings (plots 53-61) in lieu of approved employment units B & C

Consultation response from SSDC Area Development.

Dear Adrian,

I object to this application for the following reasons:

- The applicant has not justified that the employment units as part of the approved plan, are no longer relevant to the long-term sustainability of the local area.
- The applicant has not demonstrated sufficient marketing which would act as evidence of nil or low demand, to justify the loss of employment land to be replaced with residential.

I am unaware of submitted evidence to fully justify lack of commercial viability, which is referred to in the applicants planning statement. For example the actual prices offered and returns required, on which the DV could comment.

My observations are in three parts – 1) general observations on the loss of employment within the context of the Langport area as a sustainable community. 2) comments which refer to the planning statement submitted as part of the re-submitted application. 3) comments on the evidence of marketing provided, and compliance with the SSDC Commercial Marketing of Property (2008) – this is largely based on my previous comments to the similar application.

In summary, without an open-book viability assessment, and / or an improved and sustained marketing strategy, the applicant has not proved its case, this application would not contribute to local well-being, is not in keeping with local socio-economic plans and its impact is not mitigated in other ways.

1) Sustainability

With regard to the long term sustainability of the area, residents, businesses and local councillors taking part in a range of community consultations and engagement activity over many years have always regarded housing development at Old Kelways to represent a loss of employment for the area. New dwellings at Old Kelways, Newtown and Bartletts Elm, incremental infill on former employment sites in other areas within the town, together with the indicative planned growth to 2026 are of concern if not coupled with a strong Development Management focus for regeneration directed towards enabling inward investment for employment – including the protection of areas for jobs.

Further local evidence of support for increased employment in the area can be provided. From a community perspective, the decision to approve a mixed use site development, was far more than a 'councillor aspiration' without background evidence to support this.

As a small market town, Langport is seeking to develop its sustainability, encouraging visitors, maintaining local facilities and strengthening its economy as a hub for the surrounding rural area. There is an immediate population of the town itself and nearby

rural parishes of at least 7500 residents. Langport has a newly opened 6th form, and the surgery has recently expanded. Employment opportunities need to be encouraged within this context. Based on statistics there is around a 60% self-containment.

Within the next very few years, it is expected that Superfast Broadband will reach most rural areas in Somerset. The current Somerset and Devon Broadband delivery programme is live, not an aspiration. Langport is well located within easy reach of the M5 and A303, and is fortunate to possess a reasonable bus service and a range of community and private transport options.

The ability of Langport to grow is very much constrained by its spatial / landscape characteristics, the employment site at Old Kelways is well appointed within the future residential growth area, providing a truly sustainable opportunity for clean and green office space within easy reach of an outstanding environment, modern services – and high quality housing for example that provided and anticipated by CG Fry.

I fully acknowledge that the application for nine dwellings, would provide additional benefits to the area, contributing Langport & Huish's sustainability namely the 3 units of affordable housing, and the planning obligations towards strategic and local facilities. However taking wider factors into account, for example the relatively significant level of additional affordable homes provided within the numerous additional housing developments of recent years and planned for future years, three units or facilities contributions from nine dwellings do not outweigh the potential benefits from employment.

The letter from Chesterton Humbert cites location as the key driver for the commercial letting industry, and yet the merits of Langport and this sites location are unremarked upon in the advertising used (see also comments on marketing). My points above seek to illustrate there is are opportunities for this area to grow sustainably, there are demographic, economic and technological drivers also to the commercial market, which should be taken into account in reaching a decision.

2) Response to the Planning statement

I refer in the main to the response by the applicant to my previous observations.

I do not consider the difficulties as expressed in the letter from Chesterton Humberts relating to the adjoining B1 space at Old Kelways to be sufficiently relevant to support this application based on the following: -

- I am unclear of the precise meaning of statements relating to the occupancy / vacancy of Old Kelways. The letter (p.2 para 4) seems to imply that 7350 sq' has been available for years, although as far as I am aware the vast majority of this space was only vacated by SSDC in December 2010, and by SCC around that time. I believe there is a B1 office which has been vacant for some time, on a first floor of approx 887 sq'. If this is the case, then I consider it premature to be citing Old Kelways as proof of a weak market. Lack of an 'inward investment' type marketing approach is required for both sites not merely advertising of offices to let. Vacancies in the relatively short term do not – in my view – act as evidence of a 'surplus' of office accommodation.
- If Chesterton Humberts are referring to other space, possibly on the upper floors of the pub, then a) I cannot find any on-line marketing for these and b) there is no lift and would not comply with equalities regulations.
- The B1 offices D&C have been recently let to a company relocating from Mendip district. Further details could probably be provided, however I believe to be

- technology based – seemingly an excellent example of what could be achieved.
- A small ground office is now let to the MEP Graham Watson.
- The recently vacant offices at Old Kelways form part of a listed building, with a complex array of spaces, with limited flexibility, and on four floors. I would expect the market (and therefore price sensitivity) for the different types of space to be different, albeit B1. I would imagine the current owner and SSDC to be collaborating on proactive marketing once final refitting is complete.

I am unaware of significant office vacancies within the town – if so they are for very much smaller premises and a different business market; in general Langport has retained much of its vitality through the recession due to its distinctiveness and lack of national brands. This is something to build on. There is likely to be an office development in the Westover area, this will all help re-balance Langports jobs:housing mix, and a sign of business confidence in the area. I understand there is commercial interest in taking offices at the Yeovil Innovation Centre, and likely business expansion in the South Petherton area.

I am aware of numerous large businesses – albeit not just for B1 - who clearly consider 'rural locations' to have economies of scale for a workforce. If you would like further details of larger employers in similar areas, please let me know. The cited poor opportunities for company expansion into the Langport area is arguable.

3) Marketing strategy

My key question here, is whether the LPA required the applicant to comply with the 'Commercial Marketing of Property' and if so, where is the complete evidence of compliance with this?

My comments made previously stand, I accept many of the points made in reply. My points were not made in ignorance of the current financial environment. Without sufficient and quality marketing, over a reasonable period I still consider there is insufficient credible evidence to support the position of an inadequate or failing market for *these* premises in the *current, local* circumstances over a sufficient period of time to warrant irrevocable loss to the community.

Whilst the applicant states that the application was withdrawn to review the marketing evidence, I have not seen any further evidence submitted. Para 5.2 of the planning statement refers to a discussion of ways to make the marketing evidence more robust, but this does not appear to have included further marketing.

I also cannot find a reference to the value actually used to market the employment spaces, has this been provided to the ED service with other information relating to commercial viability, which could be considered by the District Valuer? This is clearly set out in the SSDC protocol.

Has the site been offered to the commercial development market, or only direct to the business market?

If it is not necessary to highlight the particular aspects of this particular area, and site and the benefits of relocation to it, then why do other developers do this? The advertised details

<http://www.findaproperty.com/displayprop.aspx?edid=04&salerent=1&pid=10062850>

imply an approach to marketing which was not as focused as others I reviewed towards a successful sale for commercial development.

The commercial details on-line have not been updated in the light of previous comments made by myself and the SSDC economic development service.

Summary

I fully accept that business confidence / ability to invest is not high at present, but there are signs of local business confidence which we can evidence. Given the insufficiency of marketing, I feel there is insufficient evidence that the applicant has complied with the expectations under our planning policies and the existing planning consent – which was based upon a mixed use site.

If not done before now, the marketing strategy should be agreed prior to further commencement with SSDC, I would be happy to work with the ED team and the applicant to find ways to pursue further marketing for inward investment to secure the outcome the community and economy will benefit from.

The applicant frequently cites issues related to viability rather than local need / demand per se, if this is the case, perhaps an open book review is appropriate by the LPA?

Finally, my comments have been made without consideration of the continuing financial interest held at Old Kelways by SSDC.

I hope this is helpful to you. Please contact me with any further queries.

Charlotte Jones
Area Development Manager (North)
SSDC

For reference I attach my previous comments on marketing from the perspective of the marketing mix – product, place, price and promotion.

Attachment – comments on marketing of business units previously submitted.

1. Place As the sale particulars note, the site is a good location for business. Lifestyle choice and quality of working environment are both positive aspects to encourage businesses to move to the Langport area. The availability of broadband has offered companies choice on where to do business from, and this site offers the chance to avoid the congestion (and prices) of the local conurbations of Taunton and Yeovil.

- Comparing properties marketed by the same and other commercial agents, it would seem that when marketing Old Kelways, the location of Langport has been simply used to note its position on the tourist map, rather than a business location.
- Whilst Langport's significance as the 'heart of the levels' is referred to there is no explanation as to what this might mean for an incoming business – or the lifestyle its staff might expect. Langport is locally referred to as being '14 miles from anywhere' – underlining its location between Taunton, Yeovil and Bridgwater, the A303 and M5.
- Agents selling 'off-plan' on other locations (eg Gillingham, Glastonbury) have made far more of the location in their attempts to market. For example for offices, the proximity of a hotel may be relevant for visiting customers or staff. There is lodge style accommodation on site as part of the Old Kelways complex, not referred to in the sale particulars.
- For larger premises – as these are – a potential customer may need to consider the relocation of staff and their families – there is a new 6th form in Langport, and the town is often quoted as being '14 miles from anywhere' – for shopping and leisure, plus easy road access to Salisbury, Exeter, Bristol and Bath. Rail from Yeovil, Castle Cary and Taunton. All not mentioned.

2. Product The offer is set out in the sale particulars is to let the units by leasehold, noting flexibility of space, a modern working environment, and the historic context of the town.

- There is no mention of **dedicated parking** – which is available – this seems unusual, as many business places in nearby town centres do not benefit from this. A number of comparable sales particulars found from an on-line search highlight onsite & free parking as an added attraction.
- By contrast with the marketing of the Old Kelways units – the marketing of other similar sized 'off-plan' units, have fully highlighted the various features to be included - for example: DDA compliance, energy efficiency, broadband – indicating an understanding of likely customer needs.
- Whilst the close proximity to the District Council offices may be a bonus to some, the marketing appears to have missed highlighting the potential for the Old Kelways complex to develop as a mixed **business environment**, and being well related to other small scale business environments in Somerton, Langport and Hambridge, or indeed the wider area.
- The **tenure** has been limited to leasehold sales. The Old Kelways site is primarily, or will be, freehold through residential sales. The business units are physically independent units, which does not explain the requirement for the business units to be leasehold. Sites in Glastonbury and Gillingham, both

marketed 'off plan' with a mix of units available are currently offering freehold or leasehold. The Lufton 2000 phase 3 currently marketed includes freehold, design and build, and leasehold. I feel that there are no apparent physical limitations nor business limitations (from the information supplied), which explain why freehold, or even serviced accommodation were not part of the site's marketing.

- The site has been offered off-plan, no units have been built, and has been surrounded by a residential building site for much of the marketing period. Whilst appreciating the risk involved, this has probably restricted market demand for this property.
- Whilst the approved plans appear to be for two leasehold businesses, I would have thought that market testing for smaller units or even a serviced business model, may have been productive. This would have underlined the commitment of the applicant to maintain employment use at this site.
- As the units have not been built, there would have been flexibility for the build, bespoke to a customers needs. One reason for vacancies in older buildings, is likely to be the physical limitations for a modern environment – in particular access. The vacant premises referred to in the applicants statement (those at Old Kelways & Bridge Barns) include upper floor units with no lift – continued vacancy may not be evidence of lack of market for the units in question.

3. Price The price quoted seems comparable with alternatives, although the units are larger than the comparisons made – which tends to reduce the market price. There is no information from the applicant as to whether the price was negotiable – or indeed whether any lower offers were made. The sale particulars says price is 'on application'.

4. Promotion My main point is that the content of the marketing, and the context of the current site has limited the success of the promotional activity.

The applicant states:

- marketing particulars including plans prepared (comments made above)
 - Web promotion via www.chestertonhumberts.com
 - Use of Egi Property Link
 - Marketing boards at entrance
 - Direct mailing to 'all our commercial agents on our data base'
 - Local newspaper adverts on 3 occasions during 2010
- The site is on the website as stated. As at May 2011, the marketing boards at the site are not displayed. I can only assume the others to be true, all of which seems reasonable.
 - If there are additional plans other than the approved plans of the original application, it would be useful to see these.

Attached - Contrasting marketing statements for office accommodation (May 2011)

Contrasting marketing statements for office accommodation (May 2011)

Old Kelways	Old Kelways is situated on the Somerton Road out of Langport, on the edge of the town. Langport, known as the heart of the Somerset Levels, claims to be the smallest town in England and is at the heart of the rural community that makes up the Somerset Levels. Formerly a port on the River Parrett the ancient market town provides a typical range of services.
Bridge Barns (CH)	The property is located in a small rural development on the outskirts of the popular village of Long Sutton, which provides a village shop/post office, a School and several Public Houses. The nearby towns of Langport and Somerton have a good range of local facilities. It is located only 9 miles northwest of the regional commercial centre of Yeovil and to the west Taunton is approximately 15 miles. Access to the A303 is only a short distance away.
Wirral Park, Glastonbury (GTH)	<p>Glastonbury is one of Somerset's ancient market towns located 6 miles from the cathedral city of Wells, 2 miles from Street. The M5 (Junction 23) and A303 are within 30 minutes drive providing good road communications regionally and nationally. The mainline railways are located at Castle Cary (15 miles) and Taunton (23 miles) accessing London Paddington. Bristol International airport is within 30 minutes drive.</p> <p>Glastonbury with its Abbey, Tor and annual music festival is world famous and the renown of the local area is enhanced by nearby prestigious Millfield School and the increasingly popular retail park, Clarks Village at Street.</p> <p>Landmark House is prominently located adjoining the A39 Street / Bath road and is accessed via Wirral Park, Glastonbury's Premier Business Park close to the new Travel Lodge Hotel with nearby occupiers including The Orchard Veterinary Practice, CarpetRight and Wollens Building Merchants.</p>
Bowdens (GHT)	<p>Bowdens Business Centre is situated in an elevated position with views overlooking the Somerset levels adjacent to the B3168 approximately 2 miles from Curry Rivel on the outskirts of Hambridge.</p> <p>The county towns of Taunton and Yeovil are within 12 miles and the A303 and M5 motorway are within 10 and 20 minutes drive respectively.</p> <p>Bowdens is a vibrant business centre providing in total some 17,000 sq ft of commercial business accommodation in one of Somerset's most attractive rural settings. The centre primarily caters for office based companies but there is a small retailing sector and Bowdens is also home to the nationally renowned Brown and Forrest restaurant/smokery which is available for the use of the business centre's occupiers.</p>

ECONOMIC DEVELOPMENT SERVICE

To: Adrian Noon
Date: 30th Jan 2012
Your Ref: 11/00894/FUL

From: David Julian
Our Ref:

ECONOMIC DEVELOPMENT – PLANNING CONSULTATION RESPONSE

Ref: 11/00894/FUL

Location: Old Kelways

Dear Adrian

After much consideration I still have a number of basic points of objection to this application.

1) The original planning application was for housing and workspace i.e. a mixed development. I would contend that the original planning permission was influenced by the inclusion of the workspace units. Members and officers would have made their original decisions with the workspace inclusion in mind, and I believe that for this now to be withdrawn presents a material consideration to refuse the change of use to dwellings. I do feel that the developer should have included the costs of developing the workspace in their overall development appraisal for this project and should have developed the workspace along with the housing as part of the initial development. Workspace development is always likely to be the least viable part of a mixed development and to raise its cost as an issue at this stage is quite unfair. Put simply, if the applicant never intended to develop the workspace, then it should not have been part of the original application.

2) It can be argued that any analysis of demand of demand for workspace will be selective and debatable. We are able to contest the applicants market appraisal on a number of levels. Our records show evidence of demand for workspace in the area. The applicant cites a flat market that I would prefer to describe as a 'buyer's market'. It can be argued (and evidenced) that it is actually a good time to negotiate favourable terms for employment space.

The applicant's market appraisal has taken a snapshot of the market position and several of their chosen examples have now progressed successfully through the rental market.

We also know that there is still confidence in speculative build - with applications expected to come forward in other parts of Langport. Our most recent planning application analysis does show planning applications moving to site delivery in the area, and more generally we are able to prove that market demand, although weak, remains active both in Area North and other areas of the District.

3) The applicant's argument for COU would appear to rest on an equally quiet housing market, indeed the developers have themselves stated that the site sales are very slow. The applicant would appear to be taking a longer term view of the overall development and may possibly 'bank' the COU until the housing market picks up. Such a prudent mid-term view of the market should be mirrored by our insistence on the existing use remaining until there is a favourable turn in the economic climate. If we accept short-term

arguments then we lose a valuable and well-located employment site, and more importantly set a precedent where short-term conditions are seen to dictate our planning policy.

At our meeting the developers offered a cogent argument against workspace costs. But in the current economic climate it is not difficult to demonstrate marginal viability by using high development costs and low income projections. This only offers a short-term view of this site and a short-term view of economic appraisal that should not over-ride a prudent longer term strategic planning view. Our Core Strategy projects a 15 year view of the District, and historically South Somerset has done well over longer economic cycles (with around 20,000 jobs created in the District 1988-2008). This request to change the employment allocation to dwellings is based on the here and by accepting the applicant's request we would weaken our ability to defend the workspace allocation in the Core Strategy.

Historically the site has enjoyed sustained employment use and remains an excellent site for employment in Langport.

For these reasons I object to the application.

David Julian
Economic Development Manager