

Bootle Area Action Plan Employment Topic Paper

1. Introduction and Purpose

1.1 This is the Employment Topic Paper and is one of a number of topic papers produced to support the examination of the Bootle Area Action Plan (AAP).

1.2 The topic paper sets out the national, regional and local planning context and then for each of the four employment policies included in the Bootle AAP the topic paper details how comments received during consultation and relevant evidence have helped to shape the policy approach.

1.3 The topic paper is intended to help the Inspector and other parties understand the Council's approach to the employment related policies and to demonstrate that they are 'sound'.

1.4 The Bootle Area Action Plan includes four policies:

- BAAP12 Employment Land Provision
- BAAP13 Protection of Employment Land
- BAAP14 Limiting the Impact of Industry on Residents
- BAAP15 Securing Opportunities for Employment and Skills from New Development

1.5 This paper is intended to set out why those policies have been drawn up and the evidence that inform them.

1.6 The evidence comes from a number of sources

- Public and stakeholder engagement
- Studies undertaken by the Sefton Council
- Studies undertaken by the Liverpool City Region
- Published national evidence

1.7 The policies are also informed by other planning documents. These include:

- The Sefton Local Plan (2017)
- Merseyside and Halton Waste Local Plan (2013)
- The National Planning Policy Framework (NPPF) (2023)
- The National Planning Practice Guidance (NPPG)
- Draft Liverpool City Region Spatial Development Strategy (SDS)

National Context

1.8 This section sets out the key national planning policies that relate to employment and which have informed the policy approach taken.

National Planning Policy Framework (NPPF) (December 2023)

1.9 Paragraph 8 of the NPPF sets out the three overarching objectives for achieving sustainable development. These include am economic objective which seeks to provide the right amount of land for the rights types of employment land.

1.10 To deliver sustainable development in a positive way paragraph 11 sets out a presumption in favour of sustainable development, which in terms of plan-making means that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and strategic policies should, as a minimum, provide for objectively assessed needs for employment, housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

- i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.

1.11 Section 6 of the NPPF is dedicated to the economy and deals with providing sufficient, appropriate and flexible enough employment land.

Local Context

1.12 The Bootle Area features a significant proportion of Sefton's employment land. This is featured both near to the docks and on the A5036 road that runs from the docks at Seaforth past the northern edge of the BAAP area up to the M57 and M58 motorways at Switch island.

1.13 The Sefton Local Plan (2015) sets out a series of employment related policies. These included policiesMN1 Housing and Employment Requirements MN2 Housing and employment allocations and MN4 Mixed Use Areas.

1.14 Policy HC1 set an employment land requirement of 81.5ha between 2012 and 2030. Policy MN2 allocated the strategic employment sites that are in the BAAP.

1.15 In addition, there a number of other relevant policies including:

- EQ4 Pollution and Hazards
- EQ5 Air Quality
- EQ6 Contaminated Land

2. Employment and the Bootle Area Action Plan

BAAP12 Employment Land Provision

Policy overview

2.1 The policy sets out the designations for employment land. These are in three groups:

2.2 The first group is for general industry where six sites are designated, as follows:

Site Ref	Site	Total Size	Available Land
BE1	Canal Street/Berry Street	17.2ha	1.14
BE2	Maritime Enterprise Park	12.7ha	0.413
BE3	Hawthorne Road/Aintree Road	5.1ha	0.329
BE4	Kingfisher/Orrell Mount	9.2ha	1.207
BE5	Land Between Regent Road and A565	20.7ha	0.978
BE6	Bridle Road	51.9ha	0

2.3 The second group is for offices, which is solely for the Bootle office quarter.

2.4 The third group is for strategic employment sites. This included two large designations.

Site Ref	Site	Size	Available
BE8	Atlantic Park	19ha	17.7
BE9	Senate Business Park	13.3ha	8.98

2.5 The designations are mostly those found in the Sefton Local Plan but there are some changes and some more detail is added, appropriate to local and changed circumstances.

Issues relating to the policies

2.6 Sefton as a borough has a low supply of employment land that reflect the borough's status as a commuter area for other places (mainly Liverpool). Bootle differs from the borough as a whole in that it has some relatively large areas dedicated to employment provision and a long history of various types of industry and in particular, heavy industry.

2.7 The policy seeks to provide sufficient employment land for the Bootle area whilst staying in conformity with the Sefton Local Plan. A different approach has been taken to in relation to what sites are being allocated for.

2.8 For example, offices, except where they are ancillary to the main use, are seen as most appropriate in the town centre or the Bootle Office Quarter and not on the large employment allocations, which will focus on B2, B8 and other core employment uses which are needed in the area.

2.9 The differences between the specific uses within the Sefton local Plan and the uses within the Bootle AAP are down to the regeneration focus of the BAAP. The Area Action Plan focus is on regenerating sites and areas which are part of Bootle's industrial legacy. Many of these are derelict, under-used or have no active uses. The BAAP is looking to get these sites used for employment.

2.10 The tighter focus for the strategic employment sites reflects that lack of other realistic opportunities to find suitable sites for strategic employment. This is reflected in the site selection methodology of the Bootle Area Action Plan. The site selection methodology confirmed that there were no other suitable sites.

<u>Offices</u>

2.11 In the 1960s the Bootle office quarter was built. This has provided a large number of office-based jobs over the years but in recent years has seen some decline with lots of empty office spaces. Traditionally we have allowed offices on wider employment sites. However, due to the large amount of vacant office spaces in the Bootle office quarter and the sequentially preferable position of being on the edge of the town centre, the policy seeks to make the Bootle Office Quarter the focus for offices in the BAAP area.

2.12 A different approach has been taken to in relation to what sites are being allocated for.

2.13 For example, offices, except where they are ancillary to the main use, are seen as most appropriate in the town centre or the office core and not on the large employment allocations, which will focus on B2, B8 and other core employment uses.

2.14 The Liverpool City Region SDS produced a Strategic Housing and Economic Needs Assessment, (HEDNA)ⁱ which identified needs.

2.15 These identified the following needs:

- General employment land 42.3ha
- Office 0.29ha
- Research and development 0.38ha

2.16 It is considered that offices need to be consolidated into Bootle Town centre and the office quarter and only ancillary offices should be located on the employment sites. This is supported by the <u>Liverpool City region HEDNA</u> where para 9.42 says:

New office development can be expected to be focused in higher quality locations, in particular Liverpool City Centre, but also potentially other town centres and selected high quality business parks such as Sci-Tech Daresbury.

2.17 Changes in office demand, specifically with working from home is likely to see a drop in demand overall, with this again supported by the HEDNA.

Office floorspace scenario	Net floorspace
Labour Demand – Core Scenario	6,700
10 Yr Net Floorspace Trend	-47,500
Labour Demand – Home Working	-69,900
Sensitivity	
5 Yr Net Floorspace Trend	-95,000

Scenarios for Net Change in Office/ R&D Floorspace, sq. m 2021-40

Strategic employment sites

2.18 Policy BAAP12 para 8 identifies that on the two strategic employment sites, the Council will not accept many units of less than 2,500m². The reason for this is that there are no realistic alternative options for the large allocations as evidenced by the BAAP site selection methodology. Whilst smaller units of less than 2,500m² can be accommodated on other sites, there are very few site options for large units.

2.19 Atlantic Park strategic employment site has planning permission and is in the process of being developed. It includes some smaller units but are mostly focused on larger units, as envisaged in the policy (see AAP, para 5.136). The Council have a current application on Senate Business Park (DC/2024/01893) for four larger employment units between 4,330m² and 11,984m² and five smaller units between 1,448m² and 2,049m².

BAAP13 Protection of Employment Land

Policy overview

2.20 This policy is designed to protect valuable employment land being developed for other uses. It does allow for small scale and ancillary uses. For example, it may allow a coffee shop that may serve employees on a site that consists of predominantly B1 and B8 uses.

2.21 This policy is similar in scope to Sefton Local Plan policy ED3, which looks to protect employment land. A key difference is that this policy proposes that land or premises must be vacant for at least 2 years (5 for Strategic Employment Sites) rather

than just 1 in the Sefton Local Plan. However, the policy will allow a period prior to the site or premises becoming vacant if it can be demonstrated that the occupants have given advanced notice of their intent to vacate. This will have to be clearly demonstrated as part of a justification for an alternative use and will only apply if it is the occupant who has decided to vacant the premises (rather than being asked to leave by the owner).

<u>Justification</u>

2.22 The justification for this policy and in particular to the approach of extending the marketing period from 12 months in the Local Plan to 2 -5 years in the BAAP is that the Council face severe challenges finding alternative suitable sites.

2.23 The Council have been flexible on some sites and have allocated them as regeneration opportunity sites (see the BAAP), accepting the fact that it may prove to be a challenge to find uses. However, the main employment sites that are designated in the BAAP cannot easily be replaced.

2.24 Short-term vacancy periods may not take into account normal economic cycles, when sites could be hard to let in one year and sought after the next.

2.25 It will be, in practice, very difficult to find new sites for employment in the borough. This would make our employment land inflexible for changes to economic circumstances and would be contrary to para 86 (d) in the NPPF.

2.26 It should be noted that both strategic employment sites currently have either permission or a current application, demonstrating both the need for the employment sites and that they are appropriate designations, and their loss to other uses would have been a significant issue for Sefton.

BAAP14 Limiting the Impact of Industry on Residents

2.27 This policy is covered in the Environment topic paper.

BAAP15 Securing Opportunities for Employment and Skills from New Development

Policy Overview

2.28 The policy was drawn up to help ensure that major schemes provide employment and training opportunities locally. The policy sets out how large scheme should include plans for how they will provide employment and training opportunities for local people.

2.29 This is achieved through the developer submitting and employment and skills plan with their application. It would normally include an agreement for what measures they will take to ensure some local opportunities through both the construct phase and the end use phase, where appropriate. For commercial uses, this would include the end users. This is not normally possible for residential schemes where it would be only through the construction phase.

Use	Development	Threshold for	Scope of
Class		Employment and	Employment and
		Skills Plan	Skills Plan
C1, C2	Hotels, Residential Institution	Buildings of	Construction
		1,000m ² or site	phase and end use
		area of 1 hectare of	occupation
		more	
C3	Residential	30+ dwellings	Construction
			phase
B, E, Sui	General Industrial; Storage or	Buildings of	Construction
generis	Distribution; Commercial,	1,000m ² or site	phase and end use
	Business and Service; Sui	area of 1 hectare of	occupation
	generis uses	more	

2.30 The criteria that the policy will be applied at is for larger schemes only and is as follows:

2.31 The policy follows the Council's Social Value SPD and some Liverpool City Region Combined Authority work and is consistent with those pieces of work.

2.32 The Liverpool City Region Combined Authority have produced a Local Skills Action Plan 2022-23. This has a range of areas of focus in relation to improving skills, training and improving employment opportunities. These include:

- Continuing to seek reduction in unemployment and countering the concerning increase in economic inactivity;
- Tackling significant employment, unemployment and economic inactivity gaps remaining for women, those from an ethnic minority, those with a disability, young people and older people;
- Promoting and opportunities for people to progress in work;
- Promote opportunities for future growth to young people and broader communities;

2.33 The Social Value SPD (2013) sets out priorities for the whole borough recognising the wider Sefton issues and therefore applies to the borough as a whole.

Policy Justification

2.34 Whist the Social Value SPD is important for the whole borough, it is important to consider the context for Bootle. Bootle scores very highly in the Indices of Multiple Deprivation. Much of the Bootle AAP area scores highly for being in some of the bottom 5% of the country in terms of deprivation by numerous measurements. This includes low education levels, low skills, high levels of worklessness and poor health are amongst the issues affecting the area.

2.35 For example, for Derby ward, 11%ⁱⁱ of 16+ year olds of working age were claiming out of work benefits and in Linacre ward the figure was higher at 14.5%. This compares to 6.3% for both the Sefton average and the northwest average and 6.3% for England as a whole.

2.36 The area as a whole scores poorly in the Indices of multiple deprivation with most of the BAAP area being in the top 20% in terms of the Indices and much of it in the top $5\%^{iii}$.

2.37 The policy helps ensure that development in the Bootle area delivers much needed opportunities for local people. Therefore, major development over a certain threshold will be intended to demonstrate how they will provide some local employment opportunities and where applicable, some training opportunities.

2.38 This should mean that the town's residents benefit directly from development.

2.39 The policy does not provide a significant extra burden to any developer either at the application stage or at the development stage and is not prescriptive on how a developer must provide the skills and opportunities.

ⁱ LCR-SDS-Housing-and-Economic-Development-Needs-Assessment-June-2023-1.pdf

^{II} Borough & Ward Profiles

^{III} English indices of deprivation 2019 - GOV.UK