



Gravity

Smart Campus

Gravity
Local Development Order
Consultation DRAFT

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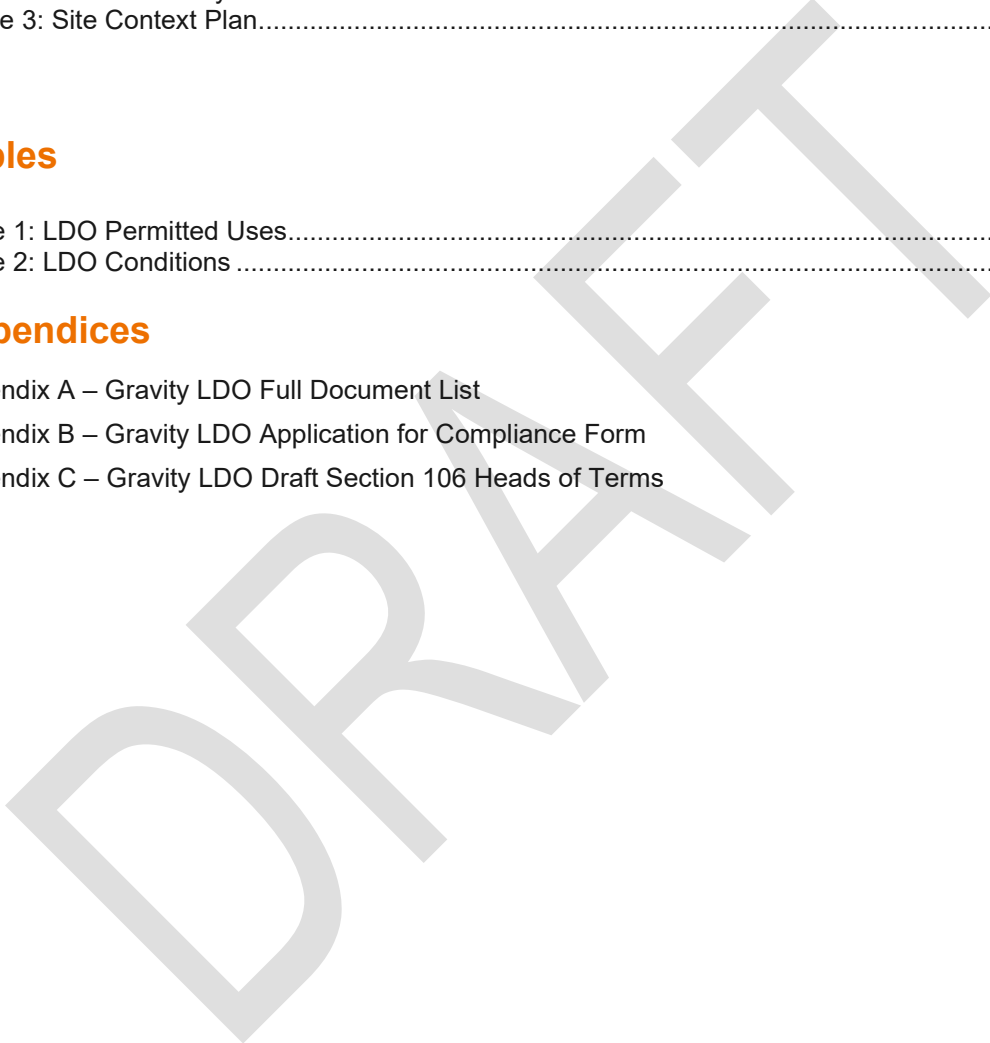
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1 Introduction to the Gravity LDO

1.1 Introduction

- 1.1.1 The draft Gravity Local Development Order 2021 (Gravity LDO) will, when adopted, grant planning permission for the Gravity – Smart Campus (Gravity) and by doing so, remove the need for a planning application to be made by the This is Gravity Limited (the developer and / or successor land owners or occupiers).
- 1.1.2 The use of LDOs is supported by Central Government as an effective means of simplifying and streamlining the planning process for certain sites and types of development specified by the Local Planning Authority (LPA). LDOs are considered to be a useful tool which can attract investment and stimulate regeneration and are therefore particularly relevant to Enterprise Zones, such as Gravity.
- 1.1.3 The Gravity LDO is the planning delivery tool to provide a proactive market led response to economic renewal, facilitating a destination for inward investment in the UK, located in the heart of the South West in Bridgwater, Somerset.
- 1.1.4 The Gravity LDO is separated into two Parts for ease of use in implementing the Gravity LDO through the compliance process:
- a. **Part 1** – sets out what the Gravity LDO consents, the conditions associated with that consent and the process which must be followed to achieve a Certificate of Compliance and subsequent implementation.
 - b. **Part 2** – sets out the context for the Gravity LDO, the Statement of Reasons, the strategy and policy considerations and other items required by the legislation and the LDO regulations.
- 1.1.5 In developing the Gravity LDO, This is Gravity Ltd, and Sedgemoor District Council (SDC) have worked collaboratively to deliver an LDO which meets the shared objectives for the Site, and which delivers on the transformational opportunity it represents for the economy of Sedgemoor, the region, and the UK as a whole. Stantec have been engaged by the developer as lead consultant in preparing the LDO, the associated documentation (listed in Appendix A) and the Environmental Statement (ES).

2 Gravity LDO: Part 1

2.1 Site

- 2.1.1 This Order is adopted by SDC under the powers conferred on the SDC as local planning authority by sections 61A-61D of and Schedule 4A to the Town and Country Planning Act 1990 (as amended) ("the Act") and pursuant to the Town and Country Planning (Development Management Procedure) (England) Order 2015 and shall be known as the "Gravity Local Development Order 2021".

2.2 Description of Development

- 2.2.1 The description of development (Proposed Development as set out in the ES) is as follows:

Any operations or engineering works necessary to enable the development of the Site, including demolition, excavation and earthworks, the formation of compounds for the stockpiling, sorting and treatment of excavated materials, import of material to create development platforms, piling, and any other operations or engineering necessary for site mobilisation, office and worker accommodation, communications, drainage, utilities and associated environmental, construction and traffic management.

The development of a smart campus including;

- **Commercial building or buildings with a total Gross External Area of up to 1,000,000m² which would sit within current Use Classes E(a) - (g), B2, B8 and sui generis floorspace uses and**
- **A range of buildings up to 100,000m² within use classes C1, C2, E (a) – (g), F, B8, including restaurants / cafes, shops, leisure, education, and sui generis uses and**
- **Up to 750 homes in use class C3,**

Together with associated infrastructure including restoration of the railway line for passenger and freight services, rail infrastructure including terminals, sidings and operational infrastructure and change of use of land to operational rail land, multi-modal transport interchange, energy generation, energy distribution and management infrastructure, utilities and associated buildings and infrastructure, digital infrastructure, car parking, a site wide sustainable water management system and associated green infrastructure, access roads and landscaping.

2.3 LDO Parameters

- 2.3.1 The Proposed Development is defined by a series of Parameter Plans which are used as the basis of assessment for the ES and included in the Design Guide. These parameter plans set the 'envelope' within which future development must fit and cover the following parameters:

- Land Uses;
- Transport and Movement: Strategic Infrastructure;
- Transport and Movement: Micro-mobility;
- Building Heights;

- Strategic Landscape;
- Infrastructure and Utilities; and
- Existing buildings to be demolished.

2.4 Development Permitted by the LDO

- 2.4.1 The Gravity LDO specifically grants planning permission for development as described at 2.2 above including the erection, extension, alteration, or demolition of a building within the particular use classes set out in Table 1 below and subject to the conditions and limitations described below.
- 2.4.2 It should also be noted that development and implementation of the LDO may take place on a phased basis and that where a material operation has been initiated in respect of any development permitted by the LDO at the time it expires, is revoked, or is revised that said development may be lawfully completed.
- 2.4.3 Table 1 below sets out the permitted uses as prescribed by The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (or any order revoking and /or re-enacting that order with or without modification).
- 2.4.4 The development of buildings, including the erection, extension, alteration, or demolition and total floorspaces in the use classes defined in Table 1 permitted at Gravity, in line with the limitations specified, is as follows.

Table 1: LDO Permitted Uses

Use Class	Definition	Limitations	Indicative Use Relating to Gravity
Advanced Manufacturing			
B2 / B8 / E(a – g) / Sui Generis	General Industrial Use	Total Gross External Area (GEA) of up to 1,000,000m ²	Advanced manufacturing (AM)
Supporting Employment Uses			
B2	General Industrial Use	Total GEA of up to 65,000m ²	Supply chain
B8	Storage or Distribution		Data Centre / AM Supply Chain
E (a) to (g)	Commercial, Business and Service		Research and development
Sui Generis	Uses which do not fall within the specified use classes above.		Electric Vehicle charging station

Supporting Uses			
C1	Hotels, boarding and guest houses where no significant element of care is provided	Total GEA of up to 35,000m ²	Hotel <i>Temporary workforce accommodation for contractors*</i>
C2	Residential Institutions		Campus training centre
E (a) to (g)	Commercial, Business and Service		Day nursery, sport and leisure indoor facilities, gym, retail, café, health centre
F	Local Community and Learning		Community building - replacement 37 Club
Dwelling Houses			
C3	Dwelling houses	Up to 750 dwellings	Homes to meet commercial operator requirements

**Not included within the GEA limitations*

2.4.5 The development permitted by the LDO also includes any operations or engineering works necessary to enable the development of the Site, including:

- demolition, excavation, and earthworks,
- the formation of compounds for the stockpiling, sorting and treatment of excavated materials,
- import of material to create development platforms,
- piling, and any other operations or engineering necessary for site mobilisation,
- office and worker accommodation,
- communications, drainage, utilities and associated environmental, construction and traffic management.

2.4.6 In addition, the development permitted by the LDO also includes associated infrastructure including:

- restoration of the railway line for passenger and freight services,
- rail infrastructure including terminals, sidings and operational infrastructure and change of use of land to operational rail land,

- multi-modal transport interchange,
- energy generation, energy distribution and management infrastructure,
- utilities and associated buildings and infrastructure,
- digital infrastructure,
- car parking,
- a site wide sustainable water management system, and
- associated green infrastructure, access roads and landscaping.

2.4.7 The LDO comes into force on the date on which it is made and, subject to SDC's power to revoke this Order under s.61A(6) of the Act, will remain in force for a period of 15 years from that date.

2.5 Minor Operations

2.5.1 In addition to the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015, or its successor, the Gravity LDO permits minor operational developments where it amounts to development under planning legislation and takes effect on completion of the permitted development under the terms outlined in para 2.4 above. Once that development is completed under those terms' pre-notification is not required for these works.

2.5.2 Minor operational development permitted by the LDO is:

- Changes to external appearance of existing buildings, including recladding, alterations to doors and windows
- Changes to access to buildings
- Installation of plant or small-scale micro renewable energy development
- Reorganisation of vehicle parking
- Provision of cycle parking
- Provision of covered bin stores

2.6 Other Consents

2.6.1 The LDO removes the requirement to obtain express planning permission but does not remove the need to obtain other statutory consents such as Building Regulations approval, consents under Highway's legislation, environmental licensing and permitting and Health and Safety Executive consents etc. It remains the responsibility of the developer to ensure that all other statutory requirements are followed.

3 Conditions

3.1 Introduction

- 3.1.1 The conditions imposed on the Gravity LDO are necessary to ensure that development is acceptable in planning and procedural terms. The conditions complement and sit alongside a Mitigation Checklist which is integral to the compliance process, and which is directly informed by the ES. Furthermore, the Design Guide assists occupiers in shaping development proposals for the local planning authority to consider during the compliance process. In parallel a Section 106 Agreement maintains key existing commitments, establishes the monitoring and management measures and links to the Locality Investment Plan (LIP) to manage business rate income to deliver investment to ensure positive outcomes can be achieved.

Table 2: LDO Conditions

	Condition	Reason
1.	<p>The LDO and the terms within it will be active for a period of 15 years following the day of its adoption and will expire following this period. The Local Planning Authority (LPA) will review progress with the LDO on the 5th anniversary of its adoption to be able to fully reflect on the continued suitability of the LDO in the light if any changes to planning policy. The review will be completed with 28 days of the 5th anniversary and at the end of the review the LPA will determine whether to:</p> <p>a) Retain the LDO as it stands for the remaining 10 years of its life; b) Retain but revise some elements; or c) Revoke and cancel the LDO</p> <p>Development which has commenced under the provisions of the LDO can be completed in the event that the LDO is revoked or revised or expires. This is subject to the LPA's confirmation of compliance issued under the Pre-Development process.</p>	In order that the regeneration benefits of the LDO can be secured.
2.	No development shall commence in relation to a particular part of the Site until an Application for Compliance Form for that part of the Site has been completed, submitted to and approved by the LPA.	To enable the impacts of the proposals to be fully assessed in line with the aims of the LDO.
3.	The development permitted by this Order shall not be carried out other than in complete accordance with the criteria and conditions set out within this LDO, the Compliance Form and the accompanying Design Guide, with the exception of material amendments submitted to and approved in writing by the LPA.	To ensure high quality sustainable development, in line with the aspirations for the LDO.
4.	No development shall commence on any part of the Site until a Notice of Compliance for that part of the site has been issued by the LPA.	In order that progress and compliance can be monitored.

5.	Development shall be carried out in accordance with the information provided and to which the Notice of Compliance has been granted, and to any additional conditions imposed by the LPA forming part of the Notice of Compliance.	To ensure compliance with the LDO.
6.	Not less than 14 days prior to the commencement of development on that part of the site an LDO Commencement Notice shall be submitted to the LPA.	To enable the monitoring of development and the effective implementation of the Order.

3.2 Alignment with the Environmental Statement and Mitigation Measures in the Mitigation Checklist

- 3.2.1 Through a detailed assessment process, the ES has identified that the demolition and construction, design and implementation phases must include mitigation which positively responds to the local environment and, where highlighted, it should, where possible, mitigate the effects, where they are identified, of delivering Gravity Smart Campus.
- 3.2.2 The Mitigation Checklist which must be completed as part of any subsequent compliance application is set out in the Compliance Form.

3.3 Section 106 Draft Heads of Terms

- 3.3.1 The Gravity LDO will be subject to an associated Section 106 Agreement. At this Consultation Draft stage, the LDO is supported by Draft Heads of Terms (HoTs). These HoTs are at Appendix C and are referenced in the Compliance Form.
- 3.3.2 The Draft HoTs set out a variety of obligations linked to governance arrangements associated with delivery of the LDO, general obligations, mitigation control measures, relevant obligations carried across from the Extant Consent Section 106 Agreement and obligations on SDC and County Council. Some of these obligations are relevant to the compliance process, particularly general obligations, and certain mitigation control measures, and in accordance with the Application for Compliance process these will need to be considered as compliance submissions are made.
- 3.3.3 Once the HoTs are agreed and the Section 106 Agreement is in place this section will be updated to reflect that final agreement.

4 Next Steps

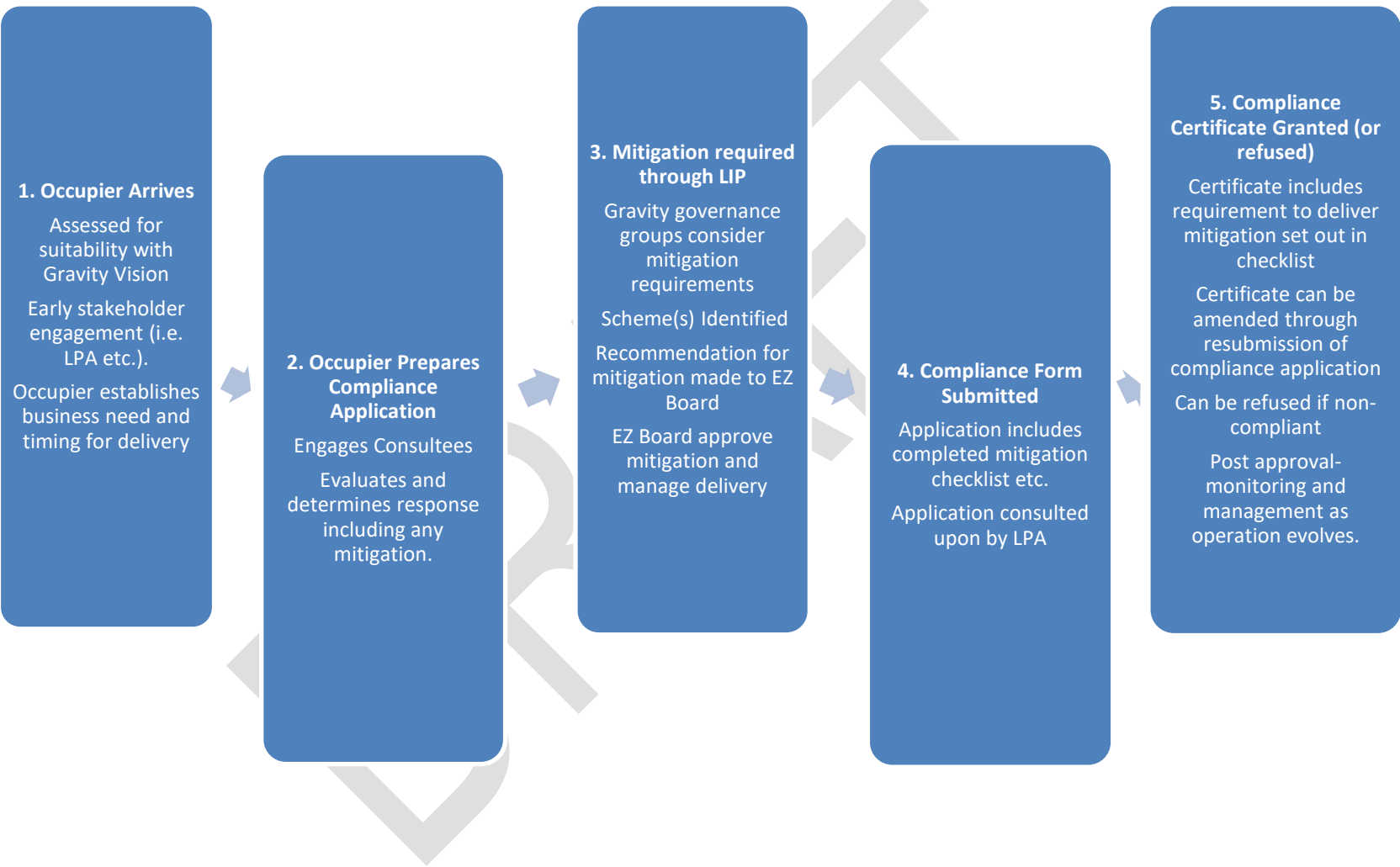
4.1 Introduction

- 4.1.1 This section has been prepared for the benefit of occupiers wishing to carry out Gravity LDO permitted development. It identifies the steps that need to be undertaken by occupiers to ensure their proposals are suitable for the Site, can be processed smoothly and determined quickly.
- 4.1.2 Works consented under previous applications such as the remediation consent (42/11/0017) can continue prior to commencement of development subsequently approved pursuant to the LDO. As per the Extant Consent (42/13/00010), some site preparatory works on Site can continue and these are set out in the Section 106 Agreement.
- 4.1.3 The Gravity LDO is not a permission to start work on the plots consented by the LDO. The Gravity LDO states matters which have been reserved for later approval. When all the reserved matters have been approved and where appropriate, conditions discharged, work may begin on the buildings consented by the LDO.

4.2 LDO Conformity Process

- 4.2.1 Prior to the commencement of development, the Compliance Form (Appendix B) shall be completed by the Applicant and submitted to the LPA, along with the necessary accompanying documents and fee payment.
- 4.2.2 Within 4-8 weeks of the submission of a compliance application, the LPA shall issue a Certificate of Compliance as to whether or not the proposed development is permitted under the Order, or whether further information is required to determine if the proposed development is in accordance with the Order.
- 4.2.3 If further information is required to make an assessment, and a decision cannot be reached within the initial 4 weeks, the LPA will seek to agree a reasonable extension of time with the Applicant up to a further 4 weeks. Should minor changes be required to ensure compliance with this Order, where feasible, the LPA will endeavour to seek amendments with the Applicant rather than issue a response of non-conformity. Again, this may require an extension of time to be agreed with the Applicant within the overall 4–8-week decision period.
- 4.2.4 If the proposal is not considered to be permitted under this Order, a planning application will be required.
- 4.2.5 Any development determined to comply with this Order, but which is later found to not accord with its terms and conditions, including the standard conditions set out in this Order, shall be liable to planning enforcement proceedings.
- 4.2.6 A simple flow chart setting out an indicative process for the preparation and submission of a compliance application is set out below in **Figure 1** to support applicants in the preparation of compliance applications.

Figure 1: Gravity LDO Compliance Process Flow Diagram



5 Gravity LDO: Part 2

5.1 Gravity LDO

- 5.1.1 The LDO is a milestone in the consenting process to re-imagine the Site within a new era of clean and inclusive growth. This will facilitate the delivery of Gravity – Smart Campus, establishing a planning regime for fast-track responses and implementation to be highly responsive to national and international business needs.
- 5.1.2 The Proposed Development is framed to attract large scale advanced manufacturing facilities to accelerate progress towards achieving a net zero carbon economy, hosting new business to ensure transport decarbonisation and the shift to electrification. Gravity - Smart Campus will be a key driver in the UK and regional economy to take positive action to address climate change.

5.2 LDO Purpose and Principles

- 5.2.1 The draft Gravity LDO must be considered alongside the accompanying Gravity LDO Design Guide which addresses design and related issues and mitigation identified through the Environmental Statement. A Section 106 Agreement will also be completed to ensure that there are respective obligations between the key parties to manage and deliver the Gravity LDO which is located within the Heart of the South West Enterprise Zone (EZ) including the use of retained business rates for investment in the locality. This is an important element to ensure capacity to enable delivery, as well as investment in skills and training to create social value, linking local communities to the new opportunities.
- 5.2.2 SDC has taken a proactive approach to encouraging investment through supporting the production of the Gravity LDO. There is a clear rationale for this project in that an LDO should create certainty and introduce flexibility for occupiers and to generate retained finance which provides locally controlled resources for local investment. This, in parallel, to maintaining strategic checks and controls through a multi-agency delivery team, providing an oversight of high levels of development management service to achieve the transformational outcomes centred on Gravity, shown in **Figure 2** below.

5.3 Legislative Context Governing the LDO Process

- 5.3.1 LDOs were introduced by the Planning and Compulsory Purchase Act 2004 and grant planning permission for the specific type of development detailed in the LDO. These primary powers were amended by the commencement of section 188 of the Planning Act 2008 in June 2009 and more detailed legislative provisions on LDOs are contained in sections 61A to 61D and Schedule 4A of the Town and Country Planning Act 1990 (as amended) and articles 38 and 41 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended (DMPO).

5.4 LDO Informal Consultation

- 5.4.1 Open and ongoing engagement with the local community, businesses and other stakeholders has taken place in advance of and during the LDO process. Such engagement has been multi-faceted using different tools, methods, and channels to involve as many people as possible (see Section 7.4 for further details).

5.5 LDO Delivery Group

- 5.5.1 The Gravity LDO Delivery Group has met regularly since October 2020. It was set up to facilitate the delivery of the Gravity LDO and organisations from across a number of sectors signed a Memorandum of Understanding and Project Charter which sets out project aims and methods of working collaboratively.
- 5.5.2 The role of the Delivery Group has been valuable as the preparation of Gravity LDO has progressed, ensuring co-operation around meeting market needs (commercial), planning, highways, and environmental matters. Each has been responsible for providing guidance, technical input, and support and to assist in delivering specific activities as appropriate and within the agreed areas of work.

5.6 LDO Statutory Consultation

- 5.6.1 It is a requirement that LDOs are the subject of statutory consultation by the LPA. LDO consultation procedures are set out in article 38 of the Town and Country Planning (Development Management Procedure) Order 2015.
- 5.6.2 Consultation must include statutory consultees whose interests would be affected by the LDO and any person with whom the LPA would have been required to consult on an application for planning permission for the development proposed to be permitted by the LDO. The Gravity LDO Full Document List is at **Appendix A**.
- 5.6.3 This Statutory Consultation is from 9th November to 9th December (30 days). The Gravity LDO and accompanying Design Guide and Environmental Statement (ES) are available on the SDC website and available for inspection at the Council's Offices and The 37 Club. The documents are also available on the Gravity website.

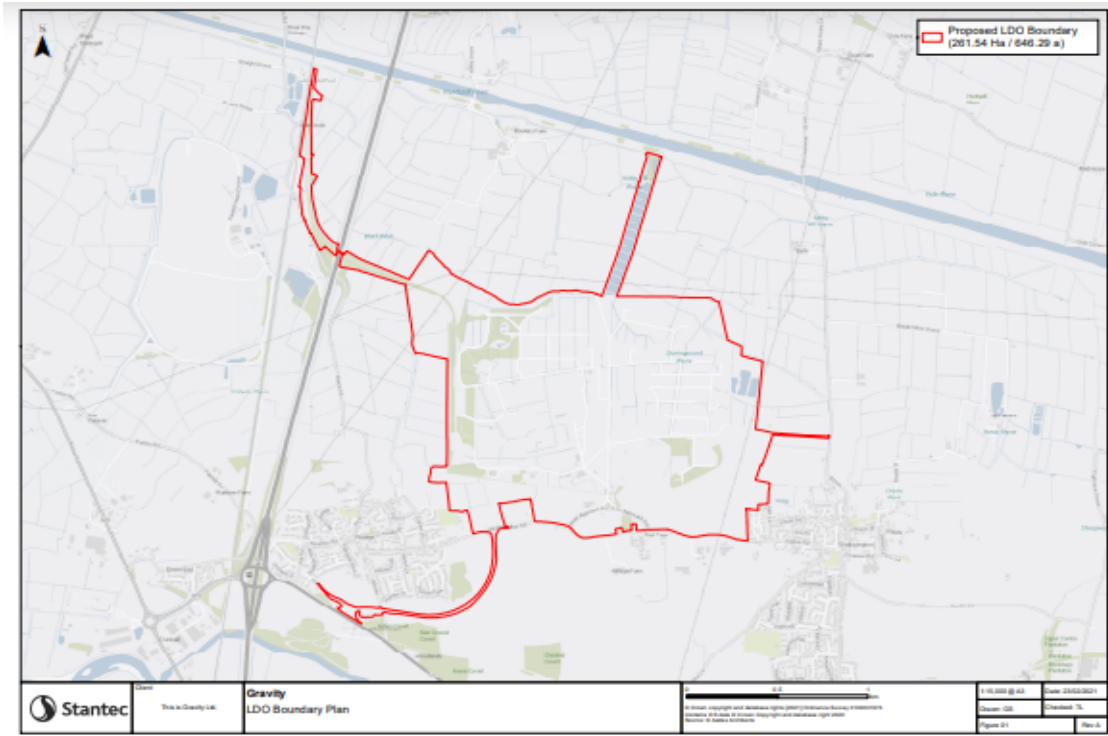
6 Proposed Gravity - Smart Campus Site

6.1 Site

- 6.1.1 The Site boundary for the Gravity LDO comprises 261.54 hectares (646.29 acres) of land, of which approximately 250 hectares (616 acres) was part of the former Royal Ordnance Factory (ROF) which closed in 2008. The majority of the Site, associated with the former ROF, is brownfield land hosting a primary industrial manufacturing use over the past 70 years. Land on the edges of the Site, in particular to the south and east, is currently greenfield agricultural land.
- 6.1.2 The Site is formally designated by Government as an Enterprise Zone (EZ) which came into force in 2017 and remains in force until 2042. The primary purpose of the EZ is to attract investment and create jobs. The agreement with Government, the Councils and the Heart of the South West Local Enterprise Partnership is for the LDO to establish a simplified planning regime in order to retain business rates locally. The Gravity LDO represents the tool to establish this regime, attract occupiers and accelerate delivery.
- 6.1.3 The main area of the Site within the ROF fence has been remediated to ensure that any residual contamination does not pose an unacceptable risk to the health of future occupants or the environment. Planning consent is also in place to create 4000 jobs through the Huntspill Energy Park hybrid planning permission (Reference 42/13/00010, consented November 2017 - the Extant Consent), which included detailed consent for the Gravity Link Road which is now constructed.
- 6.1.4 The Gravity LDO re-imagines the strategy for the Site, prioritising the need to create high-value work, in conjunction with climate action aligned with the United Nations Sustainable Development Goals - clean and inclusive growth.

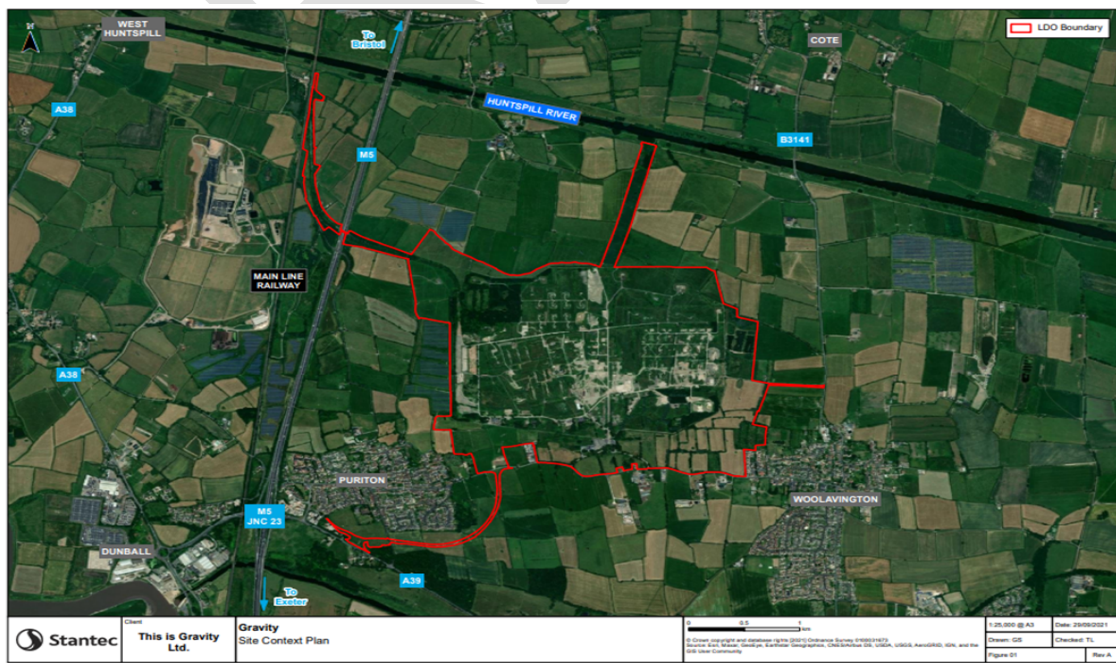
6.2 LDO Site Boundary

Figure 2: LDO Boundary Plan



6.3 Site Context

Figure 3: Site Context Plan



6.4 Surrounding Context

- 6.4.1 The village of Puriton lies immediately to the south west of the Site and the village of Woolavington lies immediately to the south east. Beyond Puriton, approximately 2km west of the Site, lies junction 23 of the M5 motorway, which runs in a north-south orientation.
- 6.4.2 As well as the M5 motorway, the closest roads are Woolavington Road which runs in an east-west direction between the villages of Woolavington and Puriton to the south of the Site and the B3141 Causeway which runs in a north south direction between the villages of East Huntspill and Woolavington to the east of the Site.
- 6.4.3 The Huntspill River lies immediately to the north of the Site. It is essentially a large reservoir constructed to provide a water supply to the former ROF.

6.5 Site Description

- 6.5.1 The Site is brownfield, low lying and flat with areas of grasslands, woodland, scrub, hedgerows, tall ruderal, and ephemeral vegetation along with standing water, reed bed, wet and dry ditches, as well as buildings and hardstanding. There are also areas of disturbed / bare ground.
- 6.5.2 In terms of access, the Site benefits from the Gravity Link Road and the link to the B3141 Causeway. There is also an established access onto Woolavington Road in the form of a Y-shaped priority junction where the western and eastern approach roads link to form a single point of entry to the Site. Former access by rail (now disused and rail lines removed) was gained by the railway spur to the west of the site.
- 6.5.3 The Gravity Link Road includes a landscape bund which has been included to provide visual and noise screening of the road to nearby residential properties. A 'green' bridge has also been installed to the south of Puriton to carry a public bridleway over the Gravity Link Road.
- 6.5.4 The local area is known as Puriton Level and is crossed by rhyes (drainage ditches). These provide the existing surface water drainage on Site, eventually discharging into the Huntspill River to the north or River Parrett to the west.
- 6.5.5 Fishing ponds are located in the east of the Site, within the Puriton Rhyes and Ponds Local Wildlife Site, and these form part of the Gravity ownership, but do not fall within the EZ designation or the Site. In the south of the Site, in the area where the Gravity Link Road joins the former ROF Site, balancing ponds have been installed for the road.
- 6.5.6 The Site is well served by utilities (gas, electricity, and water) and on the west edge also benefits from a (currently disused) link into the rail network, reinstatement of which is an important opportunity identified within the Gravity LDO. This will see the rail link reopened for both passengers and freight, as shown on the Parameter Plans.

6.6 Environmental Context

- 6.6.1 Gravity is located within a high-quality natural environment providing a framework and context to host a new era of clean growth and to retain and attract a workforce to meet business needs.
- 6.6.2 Within 5km of the Site there are a number of internationally and nationally designated nature conservation sites. These are:

- **Huntspill River National Nature Reserve (NNR)** - located immediately to the north of the Site, with a small section (c.0.7ha) overlapping with the Site. This NNR consists of open water, lowland grassland, and small areas of woodland.
- **Bridgwater Bay Site of Special Scientific Interest (SSSI) and NNR** - situated approximately 2.4km to the west of the Site at its closest point. The SSSI forms part of the Severn Estuary Special Protection Area (SPA) and Ramsar Site. Part of the Bridgwater Bay SSSI also forms part of the Severn Estuary Special Area of Conservation (SAC).
- **Catcott, Edington and Chilton Moors SSSI** is situated 3.1km to the east of the Site. This SSSI forms part of the Somerset Levels SPA and Ramsar Site.

6.6.3 The Environment Agency flood maps (which do not take account of flood defences) indicate that the majority of the Site is in Flood Zone 3 (defined as land with a 1 in 100 or greater annual probability of fluvial flooding or with a 1 in 200 or greater annual probability of tidal flooding). Some small areas are located in Flood Zone 2 and 1, with medium and low respectively probability of flooding. The tidal reaches of the River Parrett pass within 5km west of the Site and tidal flood defences have been constructed along the Parrett Estuary which are effective in this location and will be supplemented by the Bridgwater Tidal Barrier and integral flood defence embankment works, due for delivery by 2025, as a comprehensive, long-term solution.

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7 Statement of Reasons

7.1 Purpose of the LDO

- 7.1.1 Gravity aims to become the UK's leading Smart Campus for some of the World's most innovative Clean and Inclusive Growth companies. It will be the South West's and potentially the UK's largest single commercial development bringing forward a substantial amount of new employment floorspace to meet a new era of market needs in response to climate change. Its delivery will be a clear and substantive example of SDC's long-term commitment to securing higher level economic-led growth and the district's leading role in the Somerset and the wider South West economy, showcasing delivery as part of the UK's Industrial Strategy and transport decarbonisation plans.
- 7.1.2 The purpose of adopting the Gravity LDO is to deliver economic transformation in attracting new sectors and businesses, advancing clean growth through a simplified planning regime, and securing locally retained business rates. The Gravity LDO is an alternative approach to a planning application submission.
- 7.1.3 Creating a route to accelerate the delivery of the EZ to enable Gravity as a destination to host international investment in the UK is priority. Gravity is promoted by the Department of International Trade, marketed through the Global Investment Summit, and is receiving international enquiries relating to transport decarbonisation in the UK.
- 7.1.4 Shaping a market led LDO to ensure delivery and working with Government to attract occupiers, retaining local control of income to secure and deliver mitigation through local partners provides the optimum solution to generating a new generation of jobs and opportunities for local communities and businesses.
- 7.1.5 Gravity has the potential to establish the foundations for accelerating and transforming growth whilst simultaneously cutting greenhouse gas emissions, creating good jobs, low carbon homes and realising positive social outcomes for local communities.
- 7.1.6 Gravity will become the engine room of the Heart of the South West Local Enterprise Partnership Local Industrial Strategy. It will deliver transformational investment opportunities, unlock connectivity through infrastructure, and bring new higher value employment and skills opportunities to the South West. The site is geographically well related to Bristol airport and port and the wider academic and industrial partners in the Bristol City region. These are essential elements to attract international investment.
- 7.1.7 It is intended that the Gravity LDO will facilitate local, regional and national aims through the delivery of the EZ, along with meeting other strategic planning and economic objectives to deliver transformational change to the local economy. The Gravity LDO will deliver a long-term legacy of high-value job opportunities, reprofiling the economy to create opportunities for good quality training and employment in Sedgemoor, across the region and as part of the 'UK plc' offering to address the challenges of levelling-up, Brexit and Climate Change.
- 7.1.8 Gravity – Smart Campus will provide significant additional growth space for existing businesses and broaden the Council's offer to inward investors on an international level. The focus on Clean and Inclusive Growth sectors also offers a higher value capability than currently available for manufacturers and other users in this part of the South West, with the Gravity LDO offering a strong location for such activity given its brownfield status.
- 7.1.9 The scale of Gravity also offers opportunities to create and capture a positive legacy from Hinkley Point C (HPC) for some businesses to remain locally as well as leverage new inward

investment centred on energy and clean growth. HPC business consortia are already adapting and providing services to the Site to support enquiry management. HPC facilities and legacy opportunities for re-use and pre-purposing of facilities are also in discussion within the wider locality. For local individuals who are employed in temporary construction related jobs at HPC, Gravity provides a key new opportunity to transition and secure permanent employment and benefit from new training and development. Bridgwater and Taunton College (BTC) are leading the workforce development strategy and engaging with potential occupiers to ensure strong links between the community and new opportunities.

- 7.1.10 The HPC legacy also creates opportunities to assist and enable the Gravity development with dark fibre connectivity provided for HPC through the Gravity Site, with the agreement its services Gravity. The 400 kV National Grid distribution of electricity from HPC, and its routes through and close to the Gravity site, creates opportunities for Gravity to connect to national scale energy to achieve its ambitions.
- 7.1.11 The Gravity Site was designated as an EZ by Central Government following a successful application made by the Heart of the South West LEP in partnership with Sedgemoor District and Somerset County Councils. This provides a focus to attract international investment and create jobs and for the local area to retain business rates generated from the new business. Normally an employment site would generate business rates and the Council would collect them and return them to government. In this case rates that are generated over the EZ lifetime, that is a 25-year period from 1 April 2017 to 2042, will be retained by the collecting authority and reinvested locally.
- 7.1.12 A Locality Investment Plan (LIP) is in preparation, collaboratively between Gravity, SDC and EZ partners which will inform the Enterprise Zone Implementation Plan and establishes a list of candidate schemes for investment of those funds, including actions and schemes necessary to foster the purpose of the EZ on Site, other schemes strategically important to support the wider needs of the development and the locality, and works in the immediately vicinity of the Site in local communities.

7.2 Gravity - Smart Campus Development Goals

- 7.2.1 Delivery of the Gravity - Smart Campus should achieve the following:

Realising the benefits of excellent transport connections

- 7.2.2 The developer will establish a new advanced manufacturing business, forming part of a cluster in the South West, connected to the M5 corridor, port infrastructure, airports, and related clusters of enterprise, innovation and education in the Bristol City region.
- 7.2.3 Gravity already benefits from these excellent connections but will build upon this through investment in restoring rail infrastructure into the Site, complimenting the Gravity Link Road leading to the M5, and the approved Village Enhancement Scheme improving linkages between Puriton to Woolavington and delivering traffic calming in both villages.

Building upon a cluster of innovation

- 7.2.4 Gravity will create a centre of excellence in the UK for transport decarbonisation and innovation. The Site already benefits from being located at the heart of a South West innovation cluster comprising Bristol University's Smart Lab, the Bristol Robotics Lab, the National Composites Centre, the Institution of Advanced Automotive Propulsion (IAPPS) and the National Composite Centre.
- 7.2.5 Locally there are opportunities to re-purpose innovation space to support supply chain development through the Somerset Energy Innovation Centre, post HPC construction with this

facility becoming available from 2026. It is also possible that sector / business specific bespoke training facilities will be required, with a range of training from apprenticeships to PhD's to drive product development. Depending on occupiers and their manufacturing process, it is possible there may be wider links into the further South West and Cornwall for example in relation to lithium.

- 7.2.6 Gravity also has highly advantageous access to a talent pool including four top-tier universities and the nearby high performing BTC to help meet workforce needs. Bristol University, the University of the West of England and Bath University have all worked with the developer and BTC as part of the enquiry management process and have confirmed a collaborative approach to ensuring workforce development requirements can be met.

Skills and Training

- 7.2.7 Gravity is well positioned to provide work and training opportunities for the existing workforce, in terms of the skilled workers already present, and the future workforce, in the form of graduates, apprentices and talent that Gravity can bring into the region from elsewhere.

- 7.2.8 The Gravity Skills Charter represents the commitment previously reached on the importance of a local labour agreement. The Skills Charter forms part of the suite of documents supporting the Gravity LDO, which requires potential occupiers to produce a Workforce Development Strategy as well as Employment and Skills Plans (ESPs) which form part of the compliance process, with monitoring and management to track and review progress secured through the Section 106 Agreement. The Charter maintains the training commitments throughout the construction and operational phases of Gravity through the delivery of the Gravity LDO, covering the entire Site and on an occupier-by-occupier basis.

Creating jobs and homes, investing in the community

- 7.2.9 Gravity will establish the foundations for accelerating and transforming the economy while cutting greenhouse gas emissions, creating good jobs, integrating low carbon homes for Gravity employees, and realising positive social outcomes for local communities.
- 7.2.10 Gravity will create up to 7,500 permanent operational jobs to help transition Sedgemoor from a low value, low wage economy, anticipating and responding proactively to economic and structural change resulting from the pandemic and resulting recession, Brexit, and climate change.
- 7.2.11 Crafting and shaping an innovative housing offer is vital to attract occupiers who will need to commit to very significant levels of corporate investment. Low carbon homes and new accommodation choices can reduce the need to travel, incentivise young people to stay and live in the South West, and draw new investment and housing products to the UK. Up to 750 dwellings will be provided specifically to serve Gravity subject to operator demand and to provide additional capacity in the housing market to support the jobs on site.

Clean Growth

- 7.2.12 Gravity will be a pioneer in responding to the Clean Growth challenge, striving to accelerate the transition to a net zero carbon model fit for the future. The developer's approach to clean growth is underpinned by a Clean and Inclusive Growth Strategy and an Environmental and Social Governance (ESG) Policy. The developer's ambition and policies shape and drive the re-imagining of the Site and the direction of the Gravity LDO.

Digital connectivity

- 7.2.13 Digital connectivity and technology will be pervasive and ubiquitous across the Site, enabling and enhancing every activity, service, and function. Digital infrastructure will underpin future energy, mobility and building management systems, and will be integral to the delivery of a seamless and engaging user experience. It has the potential to enable a range of operational efficiency, resource conservation and cost reduction benefits, and can open up a diverse set of new revenue streams.
- 7.2.14 Detailed information on the developer's plans for digital connectivity are presented in Gravity's Digital Vision document (Arup, 2020) which has informed the development of the Gravity LDO.
- 7.2.15 The commitment to digital connectivity is marked by the provision of dark fibre which is already available to occupiers, and the Department for Culture Media and Sport (DCMS) 5G trial to research connectivity and logistics movements between the port and the Site to test systems development. Cellnex and Bristol University's Smart Lab team, together with wider partners are supporting the research and development and the provision of facilities on site to further the research.

7.3 On Site Housing

- 7.3.1 The inclusion of a quantum of housing on the Site is tied to the delivery of the commercial floorspace and will be designed and implemented in such a way as to minimise any negative impact upon the local housing market whilst supporting occupiers needs on site. The opportunity to provide on-site housing is an important aspect of the Gravity LDO to make it more attractive to investors.
- 7.3.2 The 750 homes will house a proportion of the potential workforce. The housing on site will be legally tied and controlled by the final occupiers and will not be available as traditional market housing to anyone not employed at the Gravity Smart Campus. This is to ensure that the homes are utilised to meet the scheme's economic objectives in terms of labour and skills requirements.
- 7.3.3 The delivery of any units will be driven by the occupier. Should they consider homes are not needed or justified to directly accommodate a share of their workforce then the homes will not be built.
- 7.3.4 The Gravity LDO housing element will be flexible enabling companies to respond to business and workforce needs, for example, to address the needs of those who have the greatest difficulty in getting into the housing market (those early in their careers) and so creating the ideal environment for them to stay within the area by locating at Gravity and be trained in the skills required on site. This model not only supports and delivers on the local and regional economic objectives, it also addresses matters of sustainability through locating some homes immediately adjacent to jobs, reducing commuting, creating opportunities for active travel and mitigating wider effects of climate change whilst supporting the key principles for clean and inclusive growth.
- 7.3.5 The mix of housing is a matter for the operator(s) – it is important at the moment to retain flexibility on site and the competitive advantage to use the homes on site for the best operational outcome. The following are all factors which will inform the mix:
- 7.3.6 **Homes for Younger People:** A lack of economic opportunity in the area has resulted in a net drain of younger age workers at the start of their economically active careers. This is coupled with insufficient affordable housing in the local area making it harder for some young people to remain (or return to) the area. Gravity provides the economic catalyst and pathway to a high-

quality career – but without (some) homes the positive economic impact risks being diluted because many young people cannot afford to stay and live the area.

- 7.3.7 **Homes to mitigate a possible housing market impact:** With a scheme of up to 7,500 workers some housing market impact may be expected. While there is a need to support younger workers, learning from HPC, there may be demand for a range of housing options on the Site itself including a hotel, potentially serviced apartments, and some family homes.
- 7.3.8 **A commercial attractive inward investment offer:** The Site needs to be commercially competitive and as part of this competitive positioning a supply of homes may help an inward investor, particularly an international investor, mobilise their new site. It is quite likely that the Site will either replicate (in whole or part) a facility based overseas or simply involve a new international supply chain. It is reasonable to expect that a share of the workers are seconded or contracted to work on site for a period of time while the site ramps up and local skills and experience acquired. These workers need high quality short / medium term housing to avoid the need to secure property off site and in the general market.
- 7.3.9 **Accommodating the construction workforce:** There may be a need to have some temporary accommodation for some construction workers on Site. The developer anticipates that some of the local HPC construction workforce may wish to transition to the Gravity Site and we acknowledge that there are also some temporary, non-local HPC workers already in local accommodation, who may wish to stay longer locally to assist Gravity's construction. The local provision of accommodation has already been uplifted to provide for HPC and these bed spaces will remain in place.
- 7.3.10 Potential occupiers have expressed an interest in the re-use HPC worker accommodation at the Sedgemoor campus for operational workforce. If this is required, it will be subject to a separate planning application.
- 7.3.11 The flexibility to some of the host permanent homes on site for the operational workforce; coupled with temporary accommodation for construction workers, and the existing housing capacity in place for HPC should help mitigate some of the impact of additional workers in the local housing market.

7.4 Response to Informal Consultation

Non-statutory Consultation

- 7.4.1 The developer has undertaken a significant amount of early engagement and informal consultation throughout the development of the Gravity LDO proposals which has extended across the existing residential and business community as well as statutory consultees who have been an integral part of the process through the Gravity Smart Campus LDO Delivery Group (Delivery Group). The developer's team has been clear on the clean growth ambitions and the opportunity to achieve economic transformation through hosting large scale advanced manufacturing as a significant market opportunity.
- 7.4.2 SDC Officers and representatives have been part of the Delivery Group, involved in the community webinars and public exhibitions as part of the collaborative approach to the LDO. All of the Delivery Group presentations and summaries of meetings are included on the developer's website and the community has been updated through newsletters. Key points of clarification, for example on job numbers, have been communicated with press releases in conjunction with SDC.

Purpose

- 7.4.3 It has been an important part of the Gravity LDO strategy to ensure that the local community (both residents and businesses) have been kept informed of the purpose of the Gravity LDO, along with its vision and ambition to achieve a new era of clean and inclusive growth centred on creating a smart campus to host large scale manufacturing and related uses.
- 7.4.4 As the process evolved, emerging parameters were developed, and an illustrative concept created. An informal consultation exercise enabled the developer to provide the community with the opportunity to feedback and most importantly influence the parameters and local considerations. The Gravity LDO being brought forward on an EZ is by its nature market led and needs to be responsive to those requirements, but the developer and SDC have wanted to make sure the local community has been given the opportunity to engage throughout the LDO process. The community feedback has provided reassurance and a sense of urgency to ensure the proposals are market facing, deliverable and create jobs for the community. The overwhelming sentiment expressed has been the length of time since SDC and the former landowner have discussed the regeneration of the Site and that action was now needed to make things happen.

What consultation has taken place?

- 7.4.5 The developer has worked closely with the local community since acquiring the Site in 2017. Since January 2021 this has comprised:
- Regular updates in a specially designed community section on the developer's website, including launching an online interactive map as well as a feedback form for people to say what they think about the local area: thisisgravity.co.uk/community/
 - Hosting five webinars including presentations by the developer team followed by question-and-answer sessions on a variety of themes including smart and sustainable transport, the green economy, creating a smart community, and a virtual community drop in event which gave the local community the opportunity to ask any questions and engage with the project team.
 - Preparing and distributing regular e-newsletters updating the community on progress.
 - Speaking at a significant number of conferences and events including presentations on Gravity LDO, namely RTPI events, Bristol and West of England Initiative, SW Business Inside Round Table, SW Business Insider in partnership with HotSW LEP, Bridgwater Chamber of Commerce, Western Gateway Economic Development Conference, and the South West Business Council.
 - Setting up a business leaders' group.
 - Exploring new ways of working with partners and industry experts. Engaging schools, the college, and young people.
 - Updating and engaging with parish councils and individuals.
 - Posting updates on Twitter, Facebook, and LinkedIn.
 - Progressing technical work with partners to inform plans.
- 7.4.6 Every household and business (2,100) in the area was contacted at least once by direct postal mail and the June 2021 electronic newsletter went to 644 people and was opened by 251

recipients. Consultation and community pages on the developer's website have been viewed around 13,000 times to date.

- 7.4.7 In addition to the above, an in-person exhibition was held on site in the 37 Club on 19th and 23rd June 2021, providing information as to how the proposals were emerging, a concept as to how development might be delivered on the Site and inviting comments on the information presented. The exhibition material was also posted on the developer's website in a virtual consultation room so the same information could be seen and commented on via different forms of media and as a result reach as many people as possible. A total of 87 survey responses were received with a further 103 people providing comments during the exhibitions.

Key themes & how they have helped shape the LDO

- 7.4.8 The feedback from all aspects of the consultation set out above was analysed and a number of key themes emerged, namely:

- Quality of Employment Opportunities for Local People
- Gravity Vision for Clean Growth
- Sustainable Smart Mobility & Connectivity
- Protection of Homes for Local People
- Community Facilities
- An Enhanced Natural Environment
- Local Road Safety

Quality of Employment Opportunities for Local People

- 7.4.9 Achieving employment on this site was a high priority for the significant majority of consultees. The emphasis in response was on the need to create long term employment opportunities through long term investment including a variety of jobs for local people. An overriding comment was the desire to see those employment opportunities delivered quickly.
- 7.4.10 Respondents recognised that a number of the jobs are likely to be highly skilled and wanted to ensure that local people would not be ruled out as a result. They welcomed the partnership with BTC and relationships with universities and saw a priority being the need to have in place a programme for employment and training opportunities for local people. 92% of survey respondents wanted to see workforce development as a key part of any development.
- 7.4.11 It was always proposed that the Gravity LDO would provide for at least 4,000 jobs in high value industries such as advanced manufacturing, smart technology, robotics, data, and other highly skilled sectors. Since the consultation the developer team have undertaken further research to identify the number, type, and nature of the jobs likely to be required by these types of operators to ensure those numbers can be achieved. This research has shown that between 4,000 and 7,500 jobs can be accommodated on site when operating 3 shift patterns in line with the operational requirements of such industries. We have therefore revised our assessments to take account of this higher overall number.
- 7.4.12 The Skills Charter which is secured through the compliance processes and monitored through the Section 106 Agreement obligations, forms an integral part of the LDO and sets out the developer's commitment for local people to benefit from these opportunities.

- 7.4.13 The Skills Charter sets out the commitment to continue the focus on clean and inclusive growth. SDC and the developer have previously agreed a Framework Local Labour Agreement on the existing Huntspill Energy Park permission. The Skills Charter translates that agreement into a new Skills Charter for the Gravity LDO. The Charter maintains the commitment to require employment and skills plans from occupiers which then forms part of the monitoring regime. It relates to skills and training commitments throughout the construction and operational phases of Gravity through the delivery of the Gravity LDO, covering the entire Site.
- 7.4.14 Workforce development and talent acquisition is a fundamental part of the proposition to attract international investment into the UK and to the South West, creating high value, permanent jobs.
- 7.4.15 Given the extensive nature of this Site, individual Employment and Skills Plans (ESPs) will be developed for each occupier, site or parcel, as appropriate, in addition to the Skills Charter. The shared overriding objectives are to:
- (a) meet occupier needs and provide strategic linkages into local schools to raise ambition of young people.
 - (b) provide strategic linkages into Bridgwater and Taunton College (BTC) and the wider training and academic network, to ensure support and training for the new workforce.
 - (c) to provide an interface with the local community and businesses to ensure accessibility to new opportunities to enhance skills and training.
- 7.4.16 BTC will have a direct interface through the Skills Charter and subsequent ESPs, to closely align students to work experience, placements, and apprenticeships, geared to creating additional social value for the local community. BTC will work closely with the Owner and the occupiers to focus on individuals and improving life chances and wellbeing. BTC will also work to lead and shape a package of training and workforce development linked to wider universities and institutes of technology to meet occupier needs.
- 7.4.17 Investment in skills and training curricula development and potentially new bespoke training facilities to meet occupier needs are candidate initiatives in the LIP. Given the long lead in time for skills development, it is quite possible educational and training infrastructure may be an early requirement for financial consideration through business rates and potentially funds in advance to ensure positive outcomes for local people can be achieved

Gravity Vision for Clean Growth

- 7.4.18 The need to respond to the climate emergency was high on the agenda of many respondents and there was an overriding acknowledgement of the opportunity Gravity and Sedgemoor have to help deliver transformational change required to make a difference with 96% of survey respondents supporting the developer's focus on Clean Growth.
- 7.4.19 The Gravity Business Charter is part of the suite of Gravity LDO documents and occupiers will be asked to set out their response to the Charter through the compliance process. This will be monitored through the governance arrangements secured through the Section 106 Agreement. The commitment by the developer and its partners along with future occupiers of the UK's premier smart campus is to take action within their own organisations and sectors to contribute to clean and inclusive growth as well as optimise the use of local businesses.
- 7.4.20 The development of the Gravity Business Charter is a key step in ensuring the site delivers on its Environmental, Social and Corporate Governance objectives and partners and occupiers

are clear on the expectations and commitments which being part of the Gravity community entails.

Sustainable, Smart Mobility & Connectivity

- 7.4.21 Improved pedestrian and cycle accessibility between the existing villages and to the surrounding areas, including Bridgwater and Highbridge as well as to the surrounding open countryside, was a re-occurring theme to emerge from all aspects of the consultation and consistent with the support for Clean Growth. 96% of survey respondents were in support of improving and increasing the number of pedestrian and cycle routes, including support for the Village Enhancement Scheme, which provides traffic calming in the villages of Puriton and Woolavington and walking and cycling infrastructure within and between the two villages, linking the Site with the villages. Improved and safer links between the existing villages was important to all respondents when directly asked.
- 7.4.22 There was also a high level of support – 92% of survey respondents – for re-instated rail services to and from the Site, both passenger and freight, and the possibility of Gravity being able to facilitate that was seen as a positive. The passenger service was seen as being an attractor for occupiers, but also for local people as it would possibly open up other job opportunities in the wider area. 73% of survey respondents considered rail freight accessibility would make the site more attractive to operators and investors.
- 7.4.23 The developer is already committed to creating a car-free, cycle and pedestrian path between Puriton and Woolavington, including traffic calming measures within each of the villages, having already gained planning permission for the Village Enhancement Scheme. This is secured in the Section 106 Agreement.
- 7.4.24 It is notable that transport infrastructure requirements for the majority of large projects would not normally be implemented until a later stage in the project controlled through appropriate triggers. In this case, partnership funding from the HotSW LEP has enabled the Gravity Link Road to connect Gravity to the M5 via the A39 to be completed. This minimises the impact on local villages and will enable the early delivery of the Village Enhancement Scheme which has already been designed and has planning consent.
- 7.4.25 The Gravity LDO is also making provision for improved bus services, new walking and cycling connections and potential new passenger and freight links which, as recognised by consultees will benefit Puriton, Woolavington and the wider area. The LIP will include a range of transport interventions for consideration and funding through business rates income.

Protection of Homes for Local People

- 7.4.26 Local residents were keen to ensure that the influx of workers to the area would not have a negative impact on the local housing market by reducing supply, driving house prices up and local people out. Some concern was also raised regarding the coalescence of Puriton and Woolavington with Gravity joining the two as well as the overall impact on the residential amenity of existing residents.
- 7.4.27 Up to 750 homes for workers will be provided through the Gravity LDO. The requirement for these homes will be occupier led and not for sale on the open market. This will be controlled through the Compliance Form which requests that any application for residential development is accompanied by a report which clearly identifies occupier need, the number, type and tenure of residential development to be provided at any one time and will be controlled through an appropriate occupancy condition on any certificate of compliance provided in respect of that occupier need.

Community Facilities

- 7.4.28 Existing commitments to the community will be maintained directly through the Section 106 Agreement and LIP.
- 7.4.29 The inclusion of community facilities in the Gravity LDO was recognised and supported with particular emphasis on the desire to ensure that the 37 Club will be replaced in advance of the existing building being demolished, to ensure continuity in availability of this important community facility. Local residents would like to be involved in the design of any new 37 Club to ensure a suitable range of uses and activities are included.
- 7.4.30 The Section 106 Agreement will make provision for the preparation of a Replacement 37 Club Feasibility Study which will be undertaken in consultation with the local community comprising the 37 Club members, and Puriton and Woolavington parish councils. The study will examine the type of uses and facilities to be included and consider the viability of the facility to ensure its sustainability, as well as the overall design and location of the new facility. The study will also include the consideration of interim facilities. The Section 106 Agreement makes provision for the developer to fund a replacement facility. Further funds to support leisure and community facilities are identified in the LIP for consideration in respect of business rates finance.

An Enhanced Natural Environment

- 7.4.31 Preserving and enhancing the existing natural environment (flora and fauna) is a key theme. The Green Bridge drew much favourable comment in the context of wider comments regarding the need for enhanced biodiversity which was seen by many as an overriding requirement for any new development on this site, especially in the context of a potentially large footprint of development. SCC (Ecology) confirmed through EIA Scoping that 10% Biodiversity Net Gain would be required.
- 7.4.32 A Strategic Landscape Parameter Plan has been prepared and must be adhered to by any occupier wanting to develop on the Site, as set out in the Compliance Form. This has been prepared in discussion with SDC, Natural England and the Environment Agency to ensure all opportunities to retain and improve the ecology and natural habitats through new and existing blue and green infrastructure on site have been identified. Further opportunities for landscaping within individual building plots as they emerge are identified in the Design Guide with clear guidance as to how such opportunities should be approached and maximised. Additionally, given the nature of the Gravity LDO proposals, the use of materials, building design and roof detail will be utilised to minimise landscape impacts from the scheme.
- 7.4.33 Opportunities for strategic environmental improvement, biodiversity net gain and natural capital development are addressed in the LIP. This proposition seeks to collaborate with Natural England and wider partners to extend and link national nature reserves as a 'Super Reserve' in the South West to respond to climate change through nature-based recovery and enhancement.

Local Road Safety

- 7.4.34 Construction traffic was moving through Puriton at the time of the public exhibition, some associated with the building of the Gravity Link Road, but some also related to the Hinkley C Connection Project powerline being erected to the east of the Gravity Site at the same time. A number of local residents raised concerns regarding the speed and nature of the way such vehicles were driving through the village.

7.4.35 A Framework Demolition and Construction Environment Management Plan has been prepared and is submitted with the Gravity LDO. This provides a comprehensive framework of management controls within which the development must work

7.5 Environmental Impact Assessment (EIA)

EIA Screening

7.5.1 SDC issued a Screening Opinion on 23rd June 2021 which confirmed that the Gravity Smart Campus proposal is an EIA development with the requirement for an ES to be prepared.

EIA Scoping

7.5.2 The EIA Scoping Report was consulted on between 6th July and 3rd August 2021.

7.5.3 The consultation bodies consulted by SDC were as follows: Natural England, the Environment Agency, Somerset County Council, Highways England, Network Rail, National Grid, Historic England, Wessex Water, Somerset Wildlife Trust, Quantock Hills AONB unit, Mendip Hills AONB unit and a number of internal consultees at SDC.

7.5.4 The environmental topics that are included in the ES scope are: Economics; Health, Social and Wellbeing; Transport and Access; Noise and Vibration; Air Quality; Biodiversity; Water Environment; Landscape and Visual; Climate Change; and Cultural Heritage.

7.5.5 Following the consultation period, SDC issued a Scoping Opinion, planning reference 42/21/00021 on 27th September 2021.

7.6 Environmental Statement

7.6.1 The ES presents the findings of the EIA undertaken in accordance with the EIA Regulations. Running concurrently with the formulation of the Gravity LDO, the ES has sought to identify any likely significant environmental effects through the assessment of the development Parameter Plans. This has typically entailed, to ensure a robust approach, conservative assessment of the maximum development allowed within those parameters in accordance with the Rochdale envelope approach. This is not to say that the development will be implemented to these maximum parameters (the level of development could be lower as long as it is within the parameters) and therefore the ES is considered to represent a conservative assessment.

7.6.2 The EIA process then identifies appropriate design and construction measures and good practice both to mitigate, where possible, likely significant adverse environmental effects and to maximise the environmental opportunities that might arise as a consequence of the construction and operation of the proposed development.

7.6.3 The ES has also determined the residual significant beneficial and adverse environmental effects remaining after mitigation has been incorporated.

7.6.4 The ES comprises the following volumes:

- **Volume 1:** Main Report;
- **Volume 2:** Appendices; and
- **Non-Technical Summary.**

7.7 Planning Policy Context

- 7.7.1 The Gravity Site has a long contextual history. The Site was shut by BAE Systems in 2008, following sole occupation and operation as a manufacturing facility of national importance. SDC took the opportunity to ensure that the Site would deliver maximum benefit on its redevelopment, in accordance with an economic development led strategy to transform the local economy. This was necessary due to a number of industrial closures at the time, resulting in significant employment loss. Economic evaluation at the time, and indeed since, has illustrated the low value – low wage nature of the Sedgemoor economy and the employment reliance on sectors which are at risk in the future from decline and employment loss due to economic restructuring as well as advances in automation and robotics. It is therefore vital to consider the Site as part of a wider local, regional and national policy and delivery context.

7.8 National Planning Policy Framework

- 7.8.1 At a National Level planning policy is set out within the National Planning Policy Framework, revised in July 2021 (the Framework). The Framework explains that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 7.8.2 The Framework states, at paragraph 81, that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. This is particularly important where Britain can be a global leader in driving innovation, namely in the Grand Challenge areas set out within the Industrial Strategy (including artificial intelligence and big data; clean growth; future mobility), and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.
- 7.8.3 At paragraph 83 the Framework also states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative, or high technology industries, and for storage and distribution operations at a variety of scales and in suitably accessible locations.
- 7.8.4 It explains that these objectives should be delivered through the preparation and implementation of plans and the application of the policies in the Framework and that planning policies and decisions should play an active role in guiding development towards sustainable solutions.
- 7.8.5 Under the heading of 'tailoring planning controls to local circumstances' at paragraph 51, the Framework explains that LPAs are encouraged to use Local Development Orders to set the planning framework for particular areas or categories of development where the impacts would be acceptable, and in particular where this would promote economic, social or environmental gains for the area.

7.9 National Strategy

Build Back Better: Our Plan for Growth

- 7.9.1 The plan to build back better takes a transformational approach, tackling long-term problems to deliver growth that creates high-quality jobs across the UK. The plan states that we must retain our guiding focus on achieving the people's priorities: levelling up the whole of the UK, supporting our transition to net zero, and supporting our vision for Global Britain. Sedgemoor is itself identified as a Tier 1 priority area for levelling up.

COP26

- 7.9.2 In November 2021, the UK is the host of the UN's annual climate change conference, COP26, in Glasgow, where the UK's leadership in tackling climate change, including in transport, will be showcased on a global stage. The Government has committed that the UK will continue to work with all to increase climate action, build resilience and cut emissions.

Clean Growth Strategy

- 7.9.3 Sitting beneath the Build Back Better Plan are 4 Grand Challenges focused on the global trends which will transform our future, of which Clean Growth is one. Clean growth means growing our national income while cutting greenhouse gas emissions. Achieving clean growth, while ensuring an affordable energy supply for businesses and consumers, is at the heart of the UK's Industrial Strategy.
- 7.9.4 The Gravity Vision and various associated Strategies, including the Clean and Inclusive Growth Strategy, are focused on addressing this Clean Growth Grand Challenge whilst delivering an exemplar project and template for future development to support the UK in addressing the core elements of the Strategy whilst delivering transformational growth and supporting levelling up objectives.

Decarbonising Transport: A Better Greener Future

- 7.9.5 "Decarbonising Transport: Setting the Challenge", published in March 2020, brought together existing work to reduce emissions across all forms of transport, and for the first time laid out the scale of the additional reductions needed to deliver transport's contribution to legally binding carbon budgets and delivering net zero by 2050. Sixteen months on, Decarbonising Transport sets out how the UK will deliver those emissions reductions and the associated benefits that will be realised from it across the UK.
- 7.9.6 The government has committed to stretching carbon reduction targets up to the end of the Sixth Carbon Budget in 2037 and by 2050. As the largest emitting sector, transport will need to make a sizeable contribution if these targets are to be met. The plan states that the Government will regularly review progress against targets, continue to adapt and take further action if needed to decarbonise transport. They will publish reports on progress and review the pathway at least every five years.

Planning for the Future White Paper

- 7.9.7 The Planning for the Future White Paper, published in August 2020 recognises that the planning system needs to be better at unlocking growth and opportunity in all parts of the country, at encouraging beautiful new places, at supporting the careful stewardship and rebirth of town and city centres, and at supporting the revitalisation of existing buildings as well as supporting new development. Part of the response to these challenges is to consolidate other existing routes to permission including simplified planning zones and enterprise zones to ensure efficiency in the delivery of important development, such as Gravity.

7.10 Local Policy

Sedgemoor Local Plan 2019

- 7.10.1 The current Sedgemoor Local Plan was adopted in February 2019 and does not contain any specific allocation at the Site as it was considered to be a commitment, given the Extant Consent was granted at the Site. The Site is however still referenced positively within the Local Plan, in a number of places and many of the policies are directly relevant to the Site.

7.10.2 In particular Policy B1 supports and protects the transformational projects set out within the Bridgwater Vision with the Gravity Site specifically mentioned as one of those projects under the 'Local Projects' banner. Policy B16 identifies the transport projects which are required to support the delivery of the Local Plan objectives and priorities for Bridgwater. Included within the list of priority transport schemes is the Gravity Link Road and reinstatement of the rail head at Gravity.

Core Strategy

7.10.3 The Sedgemoor Core Strategy was adopted in September 2011 and, although now superseded by the new Local Plan and of limited weight in terms of the planning considerations of the Gravity LDO, included an allocation for an 'Energy Park' on the Gravity Site (Policy P1 Bridgwater), with priority given to industrial uses including renewable or low carbon energy generation and other energy-related or complementary uses, including green technologies, supply components and support services. This allocation was based upon assumptions made at the time regarding the opportunity the Site presented and identified approximately 90 hectares of developable employment land for a range and mix of employment uses.

Puriton Energy Park SPD

7.10.4 In order to provide greater detail on policies within the Core Strategy relating to the 'Energy Park', SDC adopted the Puriton Energy Park SPD in March 2012. The SPD provided a framework for assessing planning applications for the Site and focused on the main development objectives required to deliver the Energy Park. The SPD was informed by technical studies to gain an understanding of the Site constraints and opportunities.

7.10.5 The SPD has been used at the Gravity Site to date in order to inform the Strategic Design Code already approved for the Extant Consent at the Site under Condition 29 attached pursuant to that consent.

7.10.6 Notwithstanding this, since 2012, much has changed in terms of the national policy and political context, with a new Framework, a stronger focus on EZ delivery, Industrial Strategy and Clean Growth. The SPD has therefore been superseded in places but does provide some valuable input in terms of design principles.

7.11 Local Strategy

Bridgwater Vision

7.11.1 In 2009 SDC, working alongside a range of partners, published the first iteration of the Bridgwater Vision to develop a 'spatial' vision for Bridgwater. This first iteration of the Bridgwater Vision describes the Gravity Site as one of the key character areas to deliver that Vision and one of the key transformational projects within the area, also reflected within the Local Plan.

7.11.2 In 2015 the Bridgwater Vision was refreshed to provide an update on the successes delivered over the intervening 6-year period. The Gravity Site continued to be identified as a priority, maintaining detail on SDC's ambitions for the Site. The refreshed Vision explained that the then owner, BAE Systems, was considering initial ideas for potential energy uses, but that the Site could also provide a unique opportunity to the support services and industries related to a new generation of nuclear investment, possibly to accommodate foreign direct investment to supply components.

- 7.11.3 Both iterations of the Bridgwater Vision were adopted as a material consideration in the planning process and the transformational / priority schemes identified within it (including Gravity) are directly referenced in the Local Plan as a result.

Other Relevant Local Strategy

- 7.11.4 **SDC's Corporate Strategy 2020 – 2021** identifies Growth & Infrastructure as one of the three priority themes to deliver all their corporate objectives. In particular, the priority to grow the economy of Sedgemoor will be achieved by ensuring the supply of employment land, encouraging businesses to locate to Sedgemoor and working to increase the skill level of the workforce.
- 7.11.5 **SDC's Economic Development Strategy 2020 – 2050** explains that by 2050 Sedgemoor will be a clean growth and energy link on the M5 "Innovation Highway" which connects an environmental, health and marine digital hub to the south and a high-tech transport, cybersecurity, health, and data-driven hub to the north. The Economic Development Strategy identifies the prominence of Gravity as the key project within the District and states that it offers further long-term opportunity for the transformation of Sedgemoor's economy.
- 7.11.6 **Somerset's Climate Emergency Strategy**, developed jointly by the five Somerset local authorities, sector experts and external partners, was formally adopted by all five Somerset Councils in November 2020. The aim of the strategy is to reduce carbon emissions in the county and make Somerset a county resilient to the effects of climate change. The Strategy describes many objectives which are aligned with Gravity and describes a number of benefits linked to delivering development in this way across economic, social, and environmental areas.

Appendix A – Gravity LDO Full Document List

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Gravity LDO

Full Document List

LDO Document
<ul style="list-style-type: none">• Statement of Reasons• Red Line Plan• Schedule of Uses Permitted• Confirmation of Statutory Consultation• LDO Conditions• Gravity LDO Documentation List (<i>this list</i>)• S106 Draft HoTs
Compliance Form
<ul style="list-style-type: none">• Parameter Plans Compliance Statements• Land Use and Limitations Confirmation• Compliance Submission Checklist• Mitigation Checklist• Design Principles Checklist• LDO Conditions Checklist• S106 Obligations Checklist
Design Guide
<ul style="list-style-type: none">• Design Principles
Environmental Statement - Chapters
<ul style="list-style-type: none">• Chapters 1 Introduction• Chapter 2 Site Description• Chapter 3 The Proposed Development• Chapter 4 Demolition Construction and Site Management• Chapter 5 Assessment Methods• Chapter 6 Planning Policy Context• Chapter 7 Economics• Chapter 8 Health Social and Wellbeing• Chapter 9 Transport and Access• Chapter 10 Noise and Vibration• Chapter 11 Air Quality• Chapter 12 Biodiversity• Chapter 13 Water Environment• Chapter 14 Landscape and Visual• Chapter 15 Climate Change• Chapter 16 Cultural Heritage• Chapter 17 Impact Interactions• Chapter 18 Schedule of Mitigation and Monitoring
Environmental Statement - Appendices
<ul style="list-style-type: none">• Chapter 1-3: Site Context Appendices• Parameter Plans• EIA Scoping Report and Appendices• EIA Scoping Opinion• Flood Risk Assessment• Surface Water Drainage Strategy• Landscape and Visual Impact Assessment appendices: LCAs, Photo viewpoints, photomontages, Impact tables.• Lighting Impact Assessment (inc. Lighting Strategy)• Arboricultural Survey & Arboricultural Impact Assessment• Transport Assessment• Habitat Survey Report• Bat Activity Survey Report• Bat Roost Survey Report• Badger Survey Report• Bird Survey Report• Great Crested Newt Survey Report• Reptile Survey Report• Water Vole Survey Report• Invertebrate Survey Report

- SSSI unit condition summary
- Biodiversity Impact Assessment Calculations
- Shadow Habitats Regulations Assessment & Apps
- Framework Demolition Construction Environmental Management Plan
- Framework Travel Plan
- Nutrient Neutrality Statement
- Archaeology Baseline Report and planning policy summary
- Historic Environment Desk-based Assessment (DBA)
- Geophysical survey undertaken Outside ROF fence
- Operational Waste Management Strategy
- Site Waste Management Plan
- Local Labour Market Study
- Housing Market Study Area
- Community Infrastructure Note
- Climate Change Policy, Figures and Data
- Acoustic Terms, Figures, Instrumentation, Data and Sound Levels
- Air Quality Guidance, Dust Guidance, Model detail and Human Health and Ecological Receptor Detail
- ES Non-technical summary (NTS)

S106 Draft Heads of Terms (HoTs)

- S106 draft HoTs
- Gravity Monitoring and Management Plan
- Gravity Skills Charter
- Gravity Business Charter

Other Documents for Consultation

- Phase 1 Contaminated Land Assessment
- Utilities Report
- Energy Strategy

Evidence Base Documents (*not included with Consultation*)

- Baseline Economics Study
- Housing Study
- Digital Vision
- Clean and Inclusive Growth Strategy
- Environmental and Social Governance Policy

**Appendix B – Gravity LDO Application for
Compliance Form**

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APPLICATION FOR COMPLIANCE FORM
GRAVITY LOCAL DEVELOPMENT ORDER

Request for confirmation that a development is compliant with the Local Development Order

To benefit from the Gravity Local Development Order (LDO)(adopted tbc) applicants must demonstrate that proposals are in compliance with the specifications set out within the adopted LDO documents. This LDO is split into two parts which should be read in conjunction with this form:

- The **Local Development Order** document which provides the legal conditions for the implementation of LDO development; and
- The **Design Guide** document which sets the acceptable parameters and requirements for development and incorporates key Design Principles for Compliance.

This form is a checklist tool which allows both the prospective applicant and the Local Planning Authority (LPA) to assess whether a proposal is compliant with the specifications of the LDO. The content of the submission and assessment undertaken will be reasonable and proportionate to the scale and complexity of the proposal. This form includes signposting to key elements within the LDO documents for applicants to cross reference when completing their submissions.

In all circumstances it is recommended that compliance submissions should be co-designed collaboratively with the LPA from the outset. This will ensure submissions deliver outcomes aligned to the vision and objectives of the LDO and that the submission can be dealt with quickly and efficiently by the LPA when formally received.

Applicant Details

Please insert your personal details in the boxes below. If you are being represented by a third party or agent, their details may also be inputted, and they will be the delegated primary contact for future correspondence.

<i>Applicant's Name and Address</i>		<i>Agent's Name and Address</i>	
<i>Applicant's Telephone Number</i>		<i>Agent's Telephone Number</i>	
<i>Applicant's Email</i>		<i>Agent's Email</i>	

Compliance Check

This initial compliance check confirms whether your proposal is eligible for further consideration. It is important to note that your proposal cannot be compliant with the LDO if it fails these basic parameters.

Description of the proposal
Relevant part of the site – Site address or grid reference

Confirm Compliance with Parameters

The proposals must align with the Parameters which are presented in the Environmental Statement (Chapter 3.1) and replicated in the Design Guide.

Parameter Plan	Compliance Question	Applicant Compliance Response	LPA Compliance Confirmation Yes / No
Existing Buildings to be Demolished	Does the proposal include any existing buildings to be demolished?		
Building Heights	Do the proposals fit within the heights set out?		
Infrastructure and Utilities	Does the proposal set out infrastructure requirements?		
Land Uses	Does the proposal fit with the Land Uses and broad location of these uses set out in the Land Use Parameter Plan?		
Strategic Landscape	Does the proposal include strategic landscaping?		
Transport and Movement Micromobility	Does the proposal include accessibility and micro mobility details?		
Transport and Movement Strategic Infrastructure	Does the proposal include strategic transport and movement infrastructure?		

Confirm Compliance with Use Classes and Limitations

Please complete the final column in the table below to provide details of the proposals set against the LDO parameters set out in the LDO (and replicated in the Design Guide).

Use Class	Definition	Limitations	Indicative Use Relating to Gravity	This Proposal
Advanced Manufacturing				
B2 / B8 / E(a – g) / Sui Generis	General Industrial Use	Total GEA of up to 1,000,000m2	Advanced manufacturing (AM)	
Supporting Employment Uses				
B2	General Industrial Use	Total GEA of up to 65,000m2	AM Supply chain	
B8	Storage or Distribution		Data Centre / AM Supply Chain	
E (a) to (g)	Commercial, Business and Service		Research and development	
Sui Generis	Uses which do not fall within the		EV charging station	

	specified use classes above.			
Supporting Uses				
C1	Hotels, boarding and guest houses where no significant element of care is provided	Total GEA of up to 35,000m2	On site hotel. <i>Temporary workforce accommodation for contractors*</i>	
C2	Residential Institutions		Campus training centre.	
E (a) to (g)	Commercial, Business and Service		Day nursery, sport and leisure indoor facilities, gym, retail, café, health centre.	
F	Local Community and Learning.		Community building - replacement 37 Club.	
Dwelling Houses				
C3	Dwelling houses	Up to 750 dwellings	Homes to meet commercial operator requirements.	

Compliance Submission Checklist

The submission checklist allows you to check and confirm you are submitting the correct documents for your compliance application to be considered valid.

Have you included the following information within your application?

Plans	Provided (tick)	Reference (please insert)
Proposed Site Plan (1:200)		
Proposed Building Plan (1:50/ 1:100)		
Proposed Elevations and Roofscape (1:50/ 1:100)		
Landscaping Plans and External Details Plan		
Layout of access for pedestrian, cycle, vehicular and other modes of transport		
Surface Water and Foul Drainage Plan		
Proposed Materials		
Supporting Information	Provided (tick)	Reference (please insert)
Compliance Statement (setting out the proposals and compliance with the LDO and Design Guide)		
If any B8 Uses Proposed – Supporting Statement to detail the requirements including transport impact (scope to be agreed with the LPA)		

If any C3 Dwelling Houses Proposed – Supporting Statement setting out occupier requirements including type and tenure and management of properties in perpetuity (scope to be agreed with the LPA)		
Occupier Environmental and Social Governance Policy		

Mitigation Checklist

The Mitigation Checklist in the table below is derived from mitigation identified within the Gravity LDO Environmental Statement. Compliance applications must confirm each item of mitigation has been considered in preparing the application. This should be set out in the table below.

Item	Mitigation Requirement	Reference	Proposed Mitigation <i>(developer to demonstrate how proposed mitigation meets the requirements)</i>	Proposed Trigger Point for Mitigation <i>(commencement / occupation / other)</i>
Demolition and Construction				
MC1	Each Compliance Application must include a Demolition and Construction Environmental Management (DCEMP) to meet the requirements of the Framework Demolition and Construction Environmental Management Plan (FDCEMP).	ES Appendix 4.1: FDCEMP		
MC2	Each Compliance Application must demonstrate how it complies with the Site Waste Management Plan (SWMP) during demolition and construction.	ES Appendix 3.3: Site Waste Management Plan.		
Operation				
MC3	Each Compliance Application must be supported by a statement setting out proposed shift patterns, to include provision of flexible working patterns linked to employment and skills planning.	ES Appendix 9.1: Transport Assessment ES Appendix 9.2: Framework Travel Plan		
MC4	Any Compliance Application where supporting uses (e.g., retail, leisure, health) are proposed must set out details of proposed access to those uses in line with existing arrangements.	ES Appendix 9.1: Transport Assessment ES Appendix 9.2: Framework Travel Plan		
MC5	Each Compliance Application must be supported by details of on-site pedestrian and cycle links and facilities, Micro Mobility connections, mobility hubs and vehicle share schemes.	ES Appendix 9.1: Transport Assessment ES Appendix 9.2: Framework Travel Plan		

MC6	Each Compliance Application must include a Car Parking Management Note to detail the parking arrangements, type of parking (e.g., car share, disabled access, EV charging and visitor provision) and location of parking, access to parking and any potential parking charges for use of parking on site.	ES Appendix 9.1: Transport Assessment ES Appendix 9.2: Framework Travel Plan		
MC7	Each Compliance Application must include the preparation and implementation of an occupier specific Travel Plan, building upon the site wide Framework Travel Plan, with a monitoring regime to achieve preliminary modal shift targets and supporting mechanisms for securing additional sustainable transport measures.	ES Appendix 9.1: Transport Assessment ES Appendix 9.2: Framework Travel Plan		
MC8	Each Compliance Application must detail the need for improved bus service(s) to the site, incorporating enhanced main A38 corridor bus services and/or dedicated Demand responsive Transit (DRT) minibus / e-bus services for employees to align with shift patterns.	ES Appendix 9.1: Transport Assessment		
MC9	Each Compliance Application must consider the need to support delivery of SCC/SDC led off-site pedestrian/cycle improvements deliverable within SCC, National Highways (NH) and/or SDC land improving access to/from the Gravity site to Bridgwater Town Centre and/or Bridgwater Train Station.	ES Appendix 9.1: Transport Assessment		
MC10	Each Compliance Application must consider the need to support delivery of SCC/SDC led off-site highway capacity and/or safety improvements deliverable within SCC, NH and/or SDC land improving access to/from the Gravity site and commensurate with the scale of peak period development impacts.	ES Appendix 9.1: Transport Assessment		
MC11	An Ecological Mitigation and Management Strategy (EMMS) must be prepared for the Site prior to the approval of the first	ES Appendices 12.1 – 12.9: Ecology Baseline Reports		

	Compliance Application. The EMMS must include consideration of the maintenance / management measures associated with onsite ecological networks and features that are to be retained, enhanced and created within the Proposed Development.			
MC12	Each Compliance Application must confirm (in accordance with the NPPF) that all built development is located in a compatible flood zone defined by flood risk vulnerability.	ES Appendix 13.1: Flood Risk Assessment		
MC13	Each Compliance Application must confirm that it meets the requirements of the Surface Water Drainage Strategy to control outflows to receiving systems and manage surface water sustainably within the Site.	ES Appendix 13.2: Surface Water Drainage Strategy		
MC14	An Environmental Colour Assessment (ECA) must be undertaken in consideration of the whole Site in accordance with Landscape Institute Guidance Note: Environmental Colour Assessment 04/18 by the first occupier. Each subsequent Compliance Application must reference and consider the original ECA.	ES Chapter 14: Landscape and Visual		
MC15	Each Compliance Application must consider archaeological mitigation set out within the Written Scheme of Investigation (WSI) and confirm how the requirements have been satisfied.	ES Chapter 16: Cultural Heritage Appendix 16.1: Geophysical Survey Written Scheme of Investigation		
MC16	Each Compliance Application must set out any mitigation for the Grade II listed Manor Farmhouse, Puriton. This should comprise design measures for the south-west part of the Site to accommodate the built structures in a way that could mitigate, as much as possible, the alteration of the rural landscape which forms part of the wider setting of the asset.	ES Chapter 16: Cultural Heritage ES Appendix 3.1a: Land Use Parameter Plan		
MC17	Each Compliance Application must demonstrate how it complies with the Operational Waste	ES Appendix 3.2 Operational Waste Management Strategy.		

	Management Strategy (OWMS) during operation.			
MC18	Where publicly accessible facilities are proposed, the management procedures for those facilities should be specified to ensure that facilities are maintained appropriately.	ES Health, Social and Wellbeing Chapter		
C3 Dwelling Houses				
MC19	Any Compliance Application which includes Dwelling Houses must include a report setting out how the recommendations outlined in the Phase 1 Land Condition Report (including further assessment and agreeing building radon protection with Building Control) will be implemented.	Phase 1 Land Condition Report		
MC20	Any Compliance Application which includes Dwelling Houses must include details of the provision of play space, open space, physical recreation and local food growing in accordance with locally adopted standards.	ES Health, Social and Wellbeing Chapter		
MC21	Any Compliance Application which includes Dwelling Houses must comply with Building Regulations (M4), wheelchair accessibility and energy efficiency standards.	ES Health, Social and Wellbeing Chapter		
MC22	Any Compliance Application which includes Dwelling Houses must include a Noise Strategy that seeks to deliver the optimum acoustic outcome for the Site, in accordance with locally adopted standards.	ES Chapter 10: Noise and Vibration		

Design Principles

The Design Principles are set out in the Design Guide. The proposals must identify how these principles have been met. Set out the response to each Design Principle in the table below.

Parameter	Design Principle Reference from the Design Guide	Applicant Response
Land Use	LU1 – Locate the largest scale uses to the northern and central parts of the site.	

	LU2 – Locate the smaller scale and lower uses in the southern part of the site.	
	LU3 – Make efficient use of land.	
	LU4 – Locate plant, storage yards and servicing out of sight from the main entrances, streets, spaces, and amenity areas.	
	LU5 – Plan the layout of the site to put people first creating a campus to attract and retain a workforce.	
	LU6 – Ensure uses at the south-west and south-east corners of the site create a positive relationship with Woolavington and Puriton.	
Transport – Strategic Infrastructure	ST1 – Manage HGV's to operate safely with pedestrians, cyclists, and micro mobility.	
	ST2 – Prioritise pedestrian / cycle / micro mobility users.	
	ST3 – Adopt a strategic approach to parking provision.	
	ST4 – Provide accessible mobility hubs.	
	ST5 – Accommodate high levels of public transport provision.	
Transport – Micro Mobility	TM1 – Micro mobility should be designed as an integral part of site layout.	
	TM2 – Streets must be designed for everyone.	
	TM3 – Design to create safe micro mobility routes and connections.	
Building Heights	BH1 – Locate taller buildings towards the middle and northern part of the site.	
	BH2 – Design to mitigate, where possible, the landscape and visual impacts as identified in the ES	
	BH3 – Use building heights to increase the legibility of the development.	
	BH4 – Locate lowest buildings along Woolavington Road and adjacent to Puriton / Woolavington.	
Strategic Landscapes	SL1 – Create a strong strategic landscape mitigation at the edges of the site.	
	SL2 – Create edges to Puriton, Woolavington and Woolavington Road that integrate the Smart Campus with its surrounding community through the use of planting and open space provision.	
	SL3 – Ensure that internal streets and spaces have a landscape structure which makes them attractive to occupiers and their workforce.	
	SL4 – Consider opportunities to integrate the biodiversity potential of the site with its operational requirements.	
	SL5 – Ensure drainage features and waterbodies are integrated into the Smart Campus.	
	SL6 – Recognise key arrival points within the site and areas where routes	

	come together as “placemaking nodes”.	
Infrastructure and Utilities	IU1 – Leverage the value of national infrastructure.	
	IU2 – Infrastructure and utilities designed to support the clean growth and smart campus vision for the site.	
	IU3 – Integration of Multi-Use Service Trenches within streets.	

LDO Conditions

The following Conditions set out within the LDO need to be satisfied. Please provide details in the table below.

Condition	Item	Applicant Response
Condition 1	<p>The LDO and the terms within it will be active for a period of 15 years following the day of its adoption and will expire following this period. The Local Planning Authority (LPA) will review progress with the LDO on the 5th anniversary of its adoption to be able to fully reflect on the continued suitability of the LDO in the light of any changes to planning policy. The review will be completed with 28 days of the 5th anniversary and at the end of the review the LPA will determine whether to:</p> <p>a) Retain the LDO as it stands for the remaining 10 years of its life; b) Retain but revise some elements; or c) Revoke and cancel the LDO</p> <p>Development which has commenced under the provisions of the LDO can be completed in the event that the LDO is revoked or revised or expires. This is subject to the LPA's confirmation of compliance issued under the Pre-Development process.</p>	N/A
Condition 2	The development permitted by this Order shall not be carried out other than in complete accordance with the criteria and conditions set out within this LDO and the accompanying Design Guide, with the exception of material amendments submitted to and approved in writing by the LPA.	
Condition 3	No development shall commence in relation to a particular part of the site until an Application for Compliance Form for that part of the site has been completed, submitted to and approved by the LPA.	
Condition 4	No development shall commence on any part of the site until a Notice of Compliance for that part of the site has been issued by the LPA.	N/A
Condition 5	Development shall be carried out in accordance with the information provided and to which the Notice of Compliance has been granted, and to any additional conditions imposed by the LPA forming part of the Notice of Compliance.	
Condition 6	Not less than 14 days prior to the commencement of development on that part of the site an LDO Commencement Notice shall be submitted to the LPA.	

Section 106

The following relevant Planning Obligations set out within the Gravity LDO Section 106 Agreement must be satisfied by the developer as part of the compliance process. Please provide details in the table below.

Section 106 Clause	Obligation Summary	Applicant Detail
General Obligations	Skills Charter – initial workforce development strategy, with employment and skills plans for construction and operation.	
	Business Charter – monitoring reports on progress against charter objectives.	
	Environmental and Social Governance Reporting – annually.	
Mitigation Control	Locality Investment Plan Candidate Scheme – identify required candidate schemes for mitigation delivery and to achieve positive outcomes.	

Other obligations are set out within the Gravity LDO s106 Agreement which are incumbent upon Gravity (or successor in title) and which must be met in accordance with the requirements of the Agreement.

Fees and Submission

Please submit your application electronically to development.management@sedgemoor.gov.uk

All applications are charged at a fee TBC

Confirmation

The information I have given in this form and accompanying plans is correct and complete to the best my knowledge and belief.	
Name:	Position (agent/applicant):
Signature:	Date:
LPA Confirmation of Compliance	
Name:	Position
Signature:	Date:

Post Submission Information and Amendments

Upon receipt of this form, accompanying material and the correct payment your application documents will be duly considered within the prescribed 4 - 8-week determination period. Following this period, you will be issued a Certificate of Compliance if your application is determined to be compliant with the parameters of the LDO. Otherwise, you will receive written advice on how to proceed. If you wish to make minor amendments to your proposal, either during the determination period for your compliance application, or following a successful compliance application, please resubmit all of your documents including a re-completed copy of this form with a cover note explaining the extent of such alterations; including clear direction to where such changes are demonstrated within your submission. A fee will not be charged for amendments on such applications; however, this may affect the length of the determination period.

Appendix C – Gravity LDO Draft Section 106 Heads of Terms

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CONSULTATION DRAFT

DRAFT HEADS OF TERMS FOR GRAVITY LOCAL DEVELOPMENT ORDER SECTION 106 AGREEMENT

1. PARTIES

- 1.1 Sedgemoor District Council (including any successor in function) (the **Council**) as local planning authority, Somerset County Council as local highway authority (the **County Council**) and This is Gravity Limited (the **Developer**).

2. POWERS

- 2.1 S106 of the Town and Country Planning Act 1990, S111 and 120 of the Local Government Act 1972, Sections 1 and 2 of the Localism Act 2011 and all other powers enabling and enactments relating to the Site.

3. SITE

- 3.1 Land at Gravity, the former Royal Ordnance Factory (BAE Systems) at Woolavington Road, Puriton, Bridgwater, Somerset registered under title numbers ST36689, ST37824, ST802, ST83200, ST184392 and ST289157, together with [●].

4. BACKGROUND

- 4.1 A s106 Agreement was entered into between Sedgemoor District Council, Somerset County Council and Salamanca Group Topaz Limited (being the previous company name of This is Gravity Limited) dated 28 November 2017 (the **Extant S106 Agreement**) to set out certain planning obligations which were necessary to make the proposed development which was the subject of that agreement acceptable in planning terms. Planning permission associated with that S106 Agreement was granted on 28 November 2017 and allocated reference 42/13/00010.
- 4.2 The Council is making an LDO over Site and this Agreement provides the terms under which the development is brought forward under the LDO.
- 4.3 For the avoidance of doubt, the Extant S106 Agreement will, as of the date of the Commencement of Development in pursuance of the LDO be cancelled and of no further effect and will in all respects be superseded by the provisions of this Agreement.
- 4.4 Carry across definitions from Extant S106 Agreement to include, Development, Commencement of Development, Early Works etc and boilerplate clauses. Also include definition of the Occupier.
- 4.5 Recognising the Enterprise Zone designation and agreement to retain business rates locally, carry across obligations, where still relevant and appropriate, will be transferred into the new agreement to ensure transparency and continuity or transferred into the Locality Investment Plan which is the mechanism to manage business rates income to deliver solutions. This includes the A38/ A39 Dunball Roundabout and travel plan solutions including bus serves and other local transport investment schemes.
- 4.6 The Enterprise zone board continues to provide the primary governance and oversight mechanism.

5. DEVELOPER'S OBLIGATIONS

Governance Obligations

- 5.1 Prior to Commencement of Development to set up and manage the Gravity Strategic Management and Delivery Team (GSMT), the Gravity Transport and Infrastructure Management Group (TIMG) and the Environmental and Social Value Group (ESG) for an initial period of [5 years, to be reviewed annually] (**Groups**). The GSMT to report to the Gravity EZ Board as appropriate and as explained in the attached Gravity Monitoring and Management Plan (GMMP).
- 5.2 The GSMT will provide strategic oversight and take specific responsibility for liaison with Occupier(s), understanding the business needs, workforce development/ skills charter, innovation, supply chain/ business charter to ensure economic transformation.
- 5.3 GSMT shall adopt and monitor the Locality Investment Plan (LIP) to deliver the objectives in the EZ Implementation Plan (EZIP) setting out the approach to managing the use of business rates income derived from the EZ status including the identification of candidate schemes to support the delivery and mitigate the impacts of the Proposed Development.
- 5.4 The GSMT shall on a quarterly basis
- 5.4.1 make recommendations for expenditure ("Contributions") for the delivery in a timely manner of priority projects including but not limited to site wide and off-site infrastructure, structural landscaping, bespoke transport services, workforce development, training, biodiversity and staff resources and candidate schemes within the LIP;
- 5.4.2 monitor and manage the discharge of obligations agreed by the Council and the Occupier in accordance with the signed Mitigation Checklist provided for in 5.19 below
- 5.5 The GSMT shall comprise:
- (a) a representative of the District Council*
 - (b) a representative of the County Council*
 - (c) two representatives of the Developer/landowner
 - (d) two representatives of the Occupier (s)
 - (e) a representative of the local enterprise partnership
 - (f) Other advisors as required relevant to delivery e.g., National Highways, Environment Agency, Natural England, Bridgwater, and Taunton College

*on transition to a new unitary council, the Council shall have 2 representatives

- 5.6 The GSMT will establish a multi-agency Gravity delivery team that forms an agile core group of technical support to service the TIMG and ESG, aligned to expedite delivery and can effectively respond to work programme and critical path issues.
- 5.7 The TIMG will report to the GSMT and will take specific responsibility for the transport decarbonisation agenda, working with the Developer and/or the Occupier(s) on obligations within the Mitigation Checklist, rail restoration, traffic management, site travel planning, freight management, workforce transport strategy, and infrastructure investment required to implement the EZ, funding and delivery of mitigation through the LIP. Further functions and activities of the TIMG are be outlined in the GMMP.

- 5.8 The TIMG shall comprise:
- i. a Transport Co-ordinator appointed by the group;
 - ii. one representative to be nominated by the County Council and District Council;
 - iii. one representative to be nominated by the National Highways/ Department of Transport;
 - iv. one representative from Network Rail, and
 - v. up to two representatives to be nominated by the Developer or subsequent landowner/ Occupier,
 - vi. a transport Operator in the supply chain
 - vii. or such alternates as may be nominated by those representatives.
- 5.9 Additional attendees to be considered on a task and finish or observing basis, aligned with a focus and priority on implementation and delivery [for example, Bristol Port, Bristol Airport, Cellnex, National Grid, Western Power, Eon, Wessex Water / Albion].
- 5.10 The TIMG shall meet at least every six months with effect from 30 days from the adoption of the LDO and as required in response to enterprise zone delivery and Occupier priorities. Attendance will be driven by agenda and delivery priorities.
- 5.11 The ESG will report to the GSMT and will take specific responsibility for environmental and social value related matters in any Mitigation Checklist for the Proposed Development or any phase thereof and particularly in respect of the collaborative partnership effort to shape and secure positive outcomes and capture these through monitoring and management of the social value achievements, informed by the Clean and Inclusive Growth Strategy, related environmental and social governance policies of Occupiers, and the delivery of objectives of the Skills and Business Charters, specifically in respect of employment and skills plans as a mechanism to ensure workforce development.
- 5.12 The ESG shall comprise one representative nominated from;
- i. The District Council and County Council;
 - ii. Natural England;
 - iii. Environment Agency;
 - iv. up to three representatives nominated by the Developer/ landowner/ Occupier,
 - v. Bridgwater and Taunton College
 - vi. or such alternates as may be nominated by those representatives from time to time.
- 5.13 The ESG shall meet at least every six months with effect from adoption of the LDO and the confirmation of an Occupier, and from that point shall produce a report setting out approach to implementing the Skills and Business Charters aligned with the compliance process, with subsequent reports on progress, as well as stimulating and engaging in opportunities to achieve wider legacy opportunities with further functions and activities outlined in the GMMP.
- 5.14 In addition, each Group to
- (a) adopt constitutional arrangements to provide for chairing, quorate numbers and decisions taken on a majority basis.

- (b) to receive monitoring information from the Developer / Occupier on programme and issues to address to be provided by the Developer and/or Occupiers as appropriate.
- (c) in monitoring the project and its implementation the Groups are to take account of the GMMP.
- (d) employ representatives to facilitate consultancy support as required.
- (e) facilitate activity and make decisions so as to achieve the prescribed objectives of the site.

Appropriate Council and statutory consultee and key delivery partner resource costs incurred by each Group to be considered for funding through the LIP and business rates income as approved by the Gravity EZ Board.

General Obligations

- 5.15 To comply with the Gravity Skills Charter and ensure that each Occupier shall adhere to the charter and the Gravity Business Charter, and that compliance is reported on within the ESG reporting as described in the GMMP. (Note: This includes the requirement for a workforce development strategy at project initiation to set out the approach to talent acquisition, training and recruitment and this is integrated into the compliance process.)
- 5.16 To take responsibility for the implementation of site wide infrastructure in accordance with the recommendations made by the GSMT and as provided for in any approved Compliance Form or Mitigation Checklist.
- 5.17 Within 6 months of the date of this S106 agreement to supply a feasibility report for the replacement of the 37 Club facilities for the approval of the Council and provide for a replacement 37 Club facilities including interim and permanent solutions, in accordance with plans approved by the Council on the site prior to the demolition of the existing 37 Club, or on/ at an alternative site if that is considered viable/ feasible.
- 5.18 Prior to Commencement of Development obtain the necessary licences from Natural England to ensure ecological management and mitigation.

Mitigation Control Obligations

- 5.19 All items set out in the Mitigation Checklist must be complied with within the timescales relevant to the individual item.

Village Enhancement Schemes

- 5.20 To enter into the requisite highways agreement with the County Council and complete the Village Enhancement Scheme no later than 12 months after the completion of the Link Road or within 6 months of commencement of the Village Enhancement Scheme if earlier, or such other period agreed between the Parties.

Community Fund Contribution

Noise Mitigation in respect of Link Road

- 5.21 Prior to the first Occupation of the Development the Owner covenants to pay to the Council the Community Fund Contribution (see Extant s 106 Agreement for details).
- 5.22 The Developer covenants to provide for the formation of the Community Fund Panel and Community Fund Scheme as set out in the Extant S106 Agreement to deliver the aims of the Community Fund Scheme.

Village Project Fund

Community projects for Woolavington & Puriton Parish Councils

- 5.23 Prior to the first Occupation of the Development the Developer shall pay to the Council the Village Project Fund (see Extant 106 Agreement for details).

Recreation and Community Fund

- 5.24 The Developer covenants to pay to the Council the Recreation and Community Fund (see Extant s 106 Agreement for details) in the following manner:

- 5.24.1 £90,000.00 (NINETY THOUSAND POUNDS) of the Recreation and Community Fund shall be paid to the Council upon the first Occupation of any building within the Development in respect of contributing to providing recreational and community facilities nominated by Puriton and Woolavington Parish Councils (Note: previous contribution to the 37 Club now replaced by new feasibility study on replacement facilities);

6. THE COUNCIL AND THE COUNTY COUNCIL OBLIGATIONS

- 6.1 The Council and the County Council agree to

- 6.1.1 provide officers with the relevant delegated powers for membership of Groups and comply with constitution requirements of each Group including input to and securing binding decisions to inform the LIP and commission mitigation and services to implement the approved development in accordance with the clean and inclusive growth objectives of the site.
- 6.1.2 establish an interest-bearing account for receipt of business rates income paid by the Occupiers or the Developer as appropriate (**the Gravity Account**).
- 6.1.3 subject to (i) sanctioning by the County Council's section 151 officer overseeing the proper administration of financial affairs of the HOSWLEP (ii) a sufficient level of funds in the Gravity Account and (iii) approval by the Gravity EZ Board, then to apply funds for the payment of the Contributions approved by GSMT.
- 6.1.4 in the interim to agree in principle to provide initial seed funding to be paid into the Gravity Account raised from prudential borrowing or otherwise to facilitate mobilisation, of the Proposed Development and to be charged against and repaid through business rates income paid by the Occupiers.
- 6.1.5 provide input to the Mitigation Checklist and commission and deliver its mitigation obligations in a timely manner as provided for in the Mitigation Checklist and the agreed trigger / time limit set out therein.

- 6.2 Within 28 days of the fifth anniversary of the adoption of the LDO The Council will review the LDO and changes to planning policy to determine whether to:

- 6.2.1 retain the LDO as it stands for the remaining 10 years of its life;
- 6.2.2 retain but revise some elements; or
- 6.2.3 revoke and cancel the LDO.

- 6.3 Within 28 days of the fifth anniversary of the adoption of the LDO the Council will review the need for any restriction on the occupancy of any dwelling to a person who is principally employed, or was last employed, by an Occupier or the Developer to determine whether to:

- 6.3.1 retain the Occupier/Developer-led restriction on housing occupation;

- 6.3.2 adjust the ratio of Occupier/Developer-led restrictions to open market housing; or,
- 6.3.3 revoke and cancel the requirement of Occupier/Developer-led housing restrictions.

Provide that any change to the LDO in 6.2 and 6.3 above shall be approved by the GSMT

- 6.4 Development which has commenced under the provisions of the LDO can be completed in the event that the LDO is revoked or revised or expires. This is subject to the Council's confirmation of compliance issued under the Pre-Development process.



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