

**PSM10**

**South Gloucestershire  
Core Strategy  
Examination**

**Position Statement  
for  
Matter 10: - Distribution of  
Economic Development Land,  
Safeguarded and Non-Safeguarded  
Employment Sites**

**May 2012**

## **Matter 10 - Distribution of Economic Development Land, Safeguarded and Non-Safeguarded Employment Sites**

### **Q1 Is the amount of employment land provision sufficient to support the economic growth of the sub-region over the plan period?**

Council response – The employment land provision which will be delivered through Policies CS11, CS12 and CS13 of the Core Strategy is sufficient to support South Gloucestershire's economic growth and make an appropriate contribution to the economic growth of the Sub-Region.

- 1.1 The planning system is a positive mechanism for promoting economic growth and managing change to deliver the objective of a prosperous economy. A key role of the Core Strategy is to make provision for sufficient land, suitable for employment use, in the right locations, to meet the business development needs of the area. The Core Strategy approach is based on a clear understanding of business needs which have been established in the Employment Land Review (Examination Library EB23-EB25). This was prepared in the context of PPS4 but is also in conformity with paragraphs 160 and 161 of the NPPF. The approach is also in conformity with paragraphs 18 – 22 of the NPPF; as future opportunities for growth and redevelopment have been identified, a clear vision set and land allocations have been recently reviewed.
- 1.2 The South Gloucestershire Employment Land Review (ELR) was undertaken during 2009-2010 to inform the Core Strategy approach to employment land. The ELR was undertaken in three stages in line with national guidance (Employment Land Reviews Guidance Note – Office of the Deputy Prime Minister 2004). The first two stages of the report were prepared by GVA Grimley and Stage 3 by the Council.
- 1.3 The first two stages of the ELR (Examination Library Ref: EB23 &24) examined the supply and forecast demand for employment land in the district to 2026. These reports established that, on the basis of economic growth scenarios of 2.5, 2.8 and 3.2% GVA growth per annum, the supply of economic development land in the District would be significantly greater than the demand. These conclusions are summarised in Appendix 1. However, this overall picture hides locational in-balances between jobs and resident workers across the district e.g. large commitment at Severnside for distribution and warehouse uses whilst in the East Fringe workers outnumber jobs by 2:1.
- 1.4 In the ELR Stage 3 (Examination Library Ref: EB25) the Council carefully considered the results of the demand and supply side reports and made recommendations for safeguarding land for employment uses based on:
  - Site-by-site survey to review the suitability of each site for employment safeguarding in terms of a range of criteria covering economic, social and environmental issues in line with national guidance.
  - The identified needs of businesses; from the key sectors to smaller and starter businesses to provide for and encourage further economic growth.
  - The strategic objective to balance our communities and encourage sustainable lifestyles by providing opportunities to work locally and reduce car based commuting (this is further examined in response to Matter 10 Q2).

- 1.5 A portfolio of sites was then safeguarded with criteria for their development as set out in Policies CS11, CS12. It should be noted that the level of safeguarded land set out in these policies is greater than the forecast need identified in the ELR Stage 2 (Examination Library Ref: B24). This is to ensure that there is a supply of land for a range of business types including our key sectors, in a variety of locations and a range of jobs available across all our communities, allowing for churn, choice and flexibility. In addition CS13 set out an approach to non-safeguarded employment sites (see response to Matter 10 Q3). The Core Strategy employment land policies represent a considered response to an evidence based assessment of the needs of our businesses in the context of ambitious levels of economic growth and the needs of our communities to access jobs.
- 1.6 The Core Strategy therefore clearly provides for the employment land needs of the District, in doing so it has also had regard to the sub-regional context. This is set out in the Strategic Objectives – Maintaining Economic Prosperity (Para 4.2) which acknowledges the role of South Gloucestershire in the sub-region as a key driver for economic growth. South Gloucestershire has experienced high levels of growth over the last two decades and now provides in the order of 30% of jobs in the sub-region. Notwithstanding this, the further economic growth in the District must also be put in the context of the need for other parts of the sub-region in particular Weston- super Mare, Bristol city centre and south Bristol, to meet their economic aspirations. The Core Strategy achieves this.
- 1.7 As one of the changes initiated by the coalition government, a Local Economic Partnership (LEP) has been formed to promote economic growth and prosperity in the West of England. The LEP has identified the employment areas of most strategic significance to the West of England. One of these at Temple Quay in Bristol has been formally designated an Enterprise Zone. In addition the LEP has identified five further 5 Enterprise Areas where economic development will be encouraged and promoted. Of the 5 Enterprise Areas in the West of England three are in South Gloucestershire; the Science Park at Emersons Green, the advanced engineering and aerospace cluster at Filton/Patchway and Severnside for warehousing, distribution and industrial uses. In making full provision for the continued development of these three strategic employment areas in its Core Strategy South Gloucestershire's policies are in alignment with the expressed priorities of the LEP in terms of employment land.
- 1.8 Further the West of England LEP Business Plan published in December 2011. (Examination Reference: EB72) aspires to creating 95,000 additional jobs in the sub-region by 2030. This would translate to 76,000 jobs pro rata by 2026. This is not disaggregated in the Business Plan but South Gloucestershire could be expected to contribute around a third of the West of England's potential job growth over the plan period, around 25,000 jobs. While this figure would be slightly higher than the evidence based estimate of job growth set out in South Gloucestershire's Supplementary Housing Paper para 4.1-4.13 (Examination Library Ref: PS8), it should be noted that the LEP job target is aspirational rather than evidence based. Notwithstanding this, as set out in para 1.5 above the employment land portfolio identified in the Core Strategy would be sufficient to meet these levels of job growth if these are achieved in practice.
- 1.9 In summary, the Council considers that the employment land provision which will be delivered through Policies CS11, CS12 and CS13 of the Core Strategy will amply support South Gloucestershire's economic growth and make an appropriate contribution to the economic growth of the Sub-Region.

## **Q2 Will the proposed distribution of employment land help to encourage more sustainable lifestyles?**

Council response – Yes this aim has informed the selection of the areas to safeguard for employment use and the policy criteria for development on these sites

- 2.1 The Council's overarching objective to deliver sustainable communities includes objectives relating to directing new development to locations with higher levels of accessibility and to improving self-containment by enabling all communities to access local jobs (Core Strategy para 4.1). The Council has used information about the ratio of jobs to resident workers in each community, as well as consultation responses from business and residents, to inform its employment land policies. The need to address local economic and social issues has informed decisions on what land to safeguard in each area including the approach to employment land in the new neighbourhoods. The approach can be summarised as follows.
- 2.2 In the **North Fringe of Bristol** the strategy is to provide for the long term needs of businesses including the regionally important advanced engineering and aerospace business now designated an Enterprise Area at Filton/Patchway, by safeguarding significant areas of land for employment use. In addition the Core Strategy makes provision for additional housing to improve the balance between workers and jobs and addresses the need for improved transport infrastructure to support planned growth and reduce problems of congestion
- 2.3 The strategy for the communities of the **East Fringe of Bristol** is to deliver major employment development at the Emersons Green Enterprise Area and protect, and make efficient use of existing economic development land in the urban areas to improve the current imbalance between jobs and workers and reduce out-commuting.
- 2.4 In **Yate** the strategy is to improve the range and number of jobs for existing and future residents, to increase the self-containment of the town, by making more efficient use of existing and planned new employment land. Priority will be given to the regeneration/remodelling of the existing employment areas at the Western approach to the town and this will be complemented by up to 9ha of new employment land within the planned new neighbourhood and encouragement of home working in all new development (see response to Matter 21 Q6).
- 2.5 The strategy for **Thornbury** is to increase and diversify employment opportunities to improve self-containment by making better use of existing employment sites and premises.
- 2.6 At **Sevenside** the strategy is to safeguard and develop land for distribution and other extensive employment uses broadly in line with existing planning permissions. This strategy is a response to the particular circumstances in relation to extant planning permissions and flooding issues which affect this area (see response to Matter 23).
- 2.7 The strategy for the **Rural Areas** is to protect rural employment sites and support farm diversification to provide local employment opportunities (see response to Matter 25)
- 2.8 The employment land distribution has therefore been informed by the need to encourage sustainable lifestyles based on the particular needs and characteristics of each area.

- 2.9 Further, in managing development through policy CS12 the contribution of the proposed use to sustainable development is specifically addressed through CS12 (2). The aim of this criterion is to ensure that the contribution of the proposed development to the sustainability of the local area has been fully considered and addressed.
- 2.10 In summary the approach to employment development in the Core Strategy has been designed to enable and encourage more sustainable lifestyles by providing opportunities to live and work in all our communities, selecting sites for employment in sustainable locations and through development management policy guidance.

**Q3 The distinction between safeguarded and non-safeguarded sites appears to reduce the flexibility within the CS to allow for changing circumstances. Is this distinction necessary or desirable?**

Council response – The approach to employment land set out in Policies CS12 and 13 provides long term protection for the key employment sites and allows more flexibility on remaining employment sites.

- 3.1 In developing its employment land policies the Council needed to address concerns raised in engagement about the loss of employment land to housing and the need for flexibility to respond to changing business needs to encourage the regeneration and better use of employment land. The intention in developing policies CS12 and 13 was to provide a policy framework to protect the employment sites which meet the objectively assessed needs of our businesses in suitable locations whilst allowing flexibility to reflect individual circumstances and respond to changing conditions. In combination this approach meets the needs of all our businesses, working proactively with the market and contributes towards achieving balanced and sustainable communities across the District.
- 3.2 Policy CS12 makes provision for the amount and location of land to be safeguarded for economic development use and sets out criteria for assessing proposals for change from B uses to other employment or non employment uses. It is based on evidence and analysis set out in the ELR Stage 3 (Examination Library Ref: EB25). The policy supersedes policy E4 of the SGLP but SGLP Policy E3 – Criteria for Assessing Proposals for Employment Development within the Urban Area Defined Settlement Boundaries and/or Permitted by Policies E4/E6/E7 is saved as the adopted development management policy for employment development.
- 3.3 The intention behind CS12 is to provide certainty for business about the long term supply of employment land. Thus the policy will not allow uses on these areas that will erode employment character for short term market reasons without being so restrictive about the types of uses that sites stagnate and decline through lack of investment as the economy and markets change. The policy will provide flexibility for business needs whilst ensuring that; a range of employment is provided in the local area, the employment is in the right location for the proposed use and is not catered for in more appropriate locations elsewhere in the plan.
- 3.4 Various objectors have made representations to the Core Strategy requesting removal of sites from the list of safeguarded sites or changes to the boundaries of safeguarded sites. It is the Council's view that evidence has not been provided which justifies the removal of any sites from safeguarding in CS12 or the proposed boundary changes.

The portfolio of safeguarded sites meets the objectively assessed needs for employment land and there is no justification for further Green Belt allocations. Further the Council considers that the merits of any development proposals on safeguarded sites can be considered through the development management process.

- 3.5 There are a number of sites where strategic change is envisaged and the long-term use or boundaries could reasonably come under review. These have been designated as interim safeguarded sites to allow for a formal process of review through preparation of a concept statement or review of policy in the Policies, Sites & Places DPD. It is anticipated that some sites may stay in predominantly employment use but with some extra flexibility and others, in or around new neighbourhoods, may be allowed to meet other needs such as housing. The approach seeks to avoid incremental change on key sites or change to housing in advance of a strategic view being taken. This approach is a practical response to the challenges presented by the significant changes taking place in parts of the area and provides a clear policy process for managing this change
- 3.6 Policy CS 13 provides guidance on the development of non-safeguarded economic development sites. Existing employment sites many of less than 0.4 hectares are numerous and although often important in their local context are considered separate to the overall strategic employment land supply position. Consultation revealed considerable concern about the loss of such sites to housing and the resulting impact on communities. Evidence demonstrated that the loss of employment land to housing was significant in some parts of the district. Between April 1996- April 2009 about 35 ha of 'employment land' (broadly 'B' uses) within settlement boundaries was lost to residential development (includes both large and small sites). About half this land (17.4 ha) was within the Bristol East Fringe.
- 3.7 The inclusion of a policy to protect un-safeguarded employment land within development boundaries is a change from existing SGLP policy which allows such sites to be released for other uses. This strategy cannot be justified by quantitative evidence for an overall need for employment land in the District. The justification is therefore based on the core strategy objective of creating and maintaining sustainable local communities as follows:
- Retaining a supply of employment premises especially starter premises on small sites, promotes economic prosperity and flexibility for small business development (which is especially important in the current economic climate).
  - The rural economy has lost out as housing has replaced employment uses within villages due to market forces as housing land supply in villages is limited.
  - Sustainable development involves maintaining and encouraging a mix of uses near to town centres and in villages in order to meet the need for jobs in local areas; to achieve a balance in the ratio of jobs to workers; to increase range of jobs available and reduce the level of out commuting. The ratio of jobs to workers is poor in the communities of the East Fringe of Bristol, Yate & Chipping Sodbury and many villages.
- 3.8 Where employment sites are promoted for redevelopment, this policy will provide appropriate criteria to assess whether the site should continue in employment use; be released for housing or some other use; or be redeveloped for a mixed use. The aim

is to secure a managed and sustainable way forward. These sites are often too small and too numerous to show on the proposals map and so a generic policy will apply.

- 3.9 In summary the Council considers that the approach to economic development land set out in these policies is justified and appropriate. It represents a coherent expression of the District's strategic and local priorities set in the context of economic, social and environmental objectives and will enable it to plan positively and flexibly for economic development.

#### **Q4 Should there be more encouragement for small-scale employment uses in rural areas?**

Council response – The Core Strategy policy approach to employment in Rural Areas as set out in Policies CS13 and CS34, in combination with guidance in the NPPF and provisions for Neighbourhood Planning, provides sufficient encouragement for small scale employment in rural areas.

- 4.1 The Core Strategy sets out an integrated approach to rural areas, balancing the conservation of the countryside (much of which is within the Green Belt) and rural settlements with promoting thriving local communities and the rural economy. Within this context, policies, CS13 and CS34 provide a positive policy approach to small scale employment in the rural areas in line with NPPF para 81.
- 4.2 As set out in para 3.8 above, Policy CS13 will encourage small scale rural employment uses by limiting the loss of employment land resulting from higher residential land values. In addition Policy CS34 (7, 8 & 9) and paras 16.9 -10 address and support rural employment, new communication technologies and renewable energy proposals.
- 4.3 The South Gloucestershire Local Plan also contains saved policies which relate to rural employment uses. Development within settlement boundaries is enabled through E3 and Policies E6-11 enable development in the open countryside involving: conversion or reuse of existing buildings, intensification of existing uses in the Green Belt, farm diversification, agricultural development, horse related development and tourism. These SGLP policies will be reviewed and where appropriate replaced through the Policies, Sites and Places DPD in the light of national guidance, evidence and consultation.
- 4.4 Further, the Council is committed to supporting Neighbourhood Planning which provides new powers for communities to shape the future of their own areas and address local issues; including the local economy and the needs of small businesses. The Core Strategy provides a policy framework which will enable communities to include planning policies or allocations for employment uses, including appropriate changes to settlement boundaries, through Neighbourhood Planning.
- 4.5 In addition to the above the NPPF provides policy support and opportunities for rural development. In particular para 145 would enable Neighbourhood Planning to bring forward development which would otherwise be inappropriate the Green Belt through Community Right to Build Orders where it meets conditions relating to the openness and purposes of the Green Belt.

4.6 The Council considers that the Core Strategy, South Gloucestershire Local Plan and NPPF provide a policy context which encourages small scale businesses in rural areas in the context of local and national policies relating to the conservation of the open countryside and Green Belt.

## **5.0 Conclusion**

5.1 In conclusion:

- The Core Strategy employment land portfolio meets the needs of the District set within the context of South Gloucestershire's role as a key economic driver in the sub-region.
- The Core Strategy is a positive mechanism to support the ambitions of the LEP and is consistent with its wider objectives.
- The approach to employment land provision supports the Core Strategy higher level objectives for sustainable lifestyles and expresses in policy framework terms the development strategy set out in Chapter 4.
- Policies CS11-13 represent a responsive, coherent and flexible approach to the provision of employment land.

The Council respectfully asks the Inspector to take these matters into consideration.

## Appendix 1 – South Gloucestershire – Supply of and Demand for Employment Land

The following tables summarise key findings of the Council's Employment Land Review Stage 1 (Supply) and 2 (Demand).

**Table 1 – South Gloucestershire employment land supply by area and character at 2008 (in hectares)**

Main Character of Sites	South Gos. Total	Bristol North Fringe	Emersons Green	Kingswood and East Fringe	Sevenside	Yate & Chipping Sodbury	Rural Areas & Thornbury
Office location	66.6	57.1	0	1.1	0	1.5	6.9
High Quality Business Park	59.7	29.4	30.3	0	0	0	0
Research/Science Park	0	0	0	0	0	0	0
Warehouse/Distribution	146.5	45.0	0	0	77.1	7.5	16.9
General Industrial/Business	292.8	103.6	0	48.8	0	91.8	48.6
Heavy/Specialist Site	57.5	0	0	0.4	47.8	9.3	0
Incubator/SME Cluster	1.9	0	0	1.9	0	0	0
Freight Terminal	0	0	0	0	0	0	0
Site for Specific Occupier	230.5	172.9	0	5.9	0	15	36.7
Recycling Facility	1.7	1.7	0	0	0	0	0
<b>Currently Unoccupied</b>	<b>627</b>	<b>56.8</b>	<b>45.4</b>	<b>8.4</b>	<b>509</b>	<b>2.6</b>	<b>4.8</b>
Other	19.9	12.2	0	7.65	0	0	0

(Source Employment Land Review - Stage 1)

### Footnotes:

1. The analysis is for the character of a whole site and did not address changes in general character or vacancies within sites.
2. The 172.9 hectares recorded as being in use by site specific occupiers excluded the runway at Filton. This was made clear in a note within the ELR Stage 1 report to the effect: "It is worth noting that a key factor within the North Fringe is the Airbus Runway which equates to 80.8 ha. For the purposes of this study the runway has been excluded from calculations. While it is key to many employment opportunities its inclusion would misrepresent the land directly available for employment purposes as continued operations mean that it is unlikely to become available (at least to 2026) for employment development."

**Table 2 – South Gloucestershire - Projected demand for employment floorspace and land at 2009 based on alternative growth Scenarios.**

	Low growth 2.5%	Base Case 2.8%	High Growth 3.2%
<b>Office B1</b>	295,442 sq m	297,108 sq m	297,108 sq m
<b>Other Business Space B2</b>	- 75,340 sq m	- 74,723 sq m	-32,707 sq m
<b>Warehousing B8</b>	98,232 sq m	98,747 sq m	115,192 sq m
<b>Office</b>	36.8 ha	37 ha	37 ha
<b>Industrial</b>	5.7 ha	6.0 ha	20.6 ha
<b>Total</b>	42.5 ha	43 ha	57.6 ha

(Source – Employment Land Review – Stage 2)