

**SOUTH GLOUCESTERSHIRE CORE STRATEGY DPD EXAMINATION
MATTER 10 – DISTRIBUTION OF ECONOMIC DEVELOPMENT LAND,
SAFEGUARDED AND NON-SAFEGUARDED EMPLOYMENT SITES
(CS11, 12 AND 13)
THURSDAY, 21ST JUNE 2012**

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- 1. *Is the amount of employment land provision sufficient to support the economic growth of the sub-region over the plan period?***
- 1.1 Para. 19 of the NPPF identifies that the Government is committed to ensuring that the planning system does everything it can to support economic growth, with a considerable weight being placed on the need to support economic growth through the planning system.
- 1.2 In the context of plan making, para. 161 of the NPPF outlines that Local Planning Authorities should use their evidence base to assess:
 - The need for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period; and
 - The existing and future supply of land available for economic development and its sufficiency and suitability to meet identified needs.
- 1.3 The South Gloucestershire Employment Land Study (EB25, June 2010) identifies a supply of employment land of around 630ha consisting of unimplemented planning permissions, the majority of which is located at Severnside. This supply is further increased by existing vacant stock.
- 1.4 This compares with a forecast demand for approximately 40-60ha between 2006 and 2026 (EM25).
- 1.5 This would suggest that there is a theoretical over provision of at least 570ha of employment land (para. 2.25 of the 2010 Employment Study refers). Prima facie,

employment land supply provision within the Core Strategy could be considered as adequate to support the economic growth of the sub-region over the plan period.

- 1.6 However, and importantly, this quantitative approach masks a number of qualitative issues that exist with this supply. Firstly, a small number of strategic employment sites with unimplemented planning permissions (e.g. Severnside) account for a significant amount of the identified supply. In addition there is an established need to diversify the economic base of some settlements outside of strategic employment locations in response to the continued decline of manufacturing and the forecast growth in the business and financial services sectors in these locations.
- 1.7 Therefore, in order to address these qualitative issues and to acknowledge the important role that new planned economic development activity can make to the achievement of policy objectives for individual settlements, it is wholly appropriate for the Core Strategy to identify a level of provision that would exceed forecast estimates of demand. The benefits of such an approach are identified using the example of Yate.
- 1.8 Historically employment at Yate has focused on the industrial estates to the west of the town. These primarily provide employment space for the industrial and warehousing sectors, with traditionally little office accommodation. Whilst this is a successful employment location, the majority of units are becoming dated and do not match the requirements of the forecast growth employment sectors, which require modern B1 / B2 facilities (see Section 4 of Appendix 15.4 to HLD's North Yate Environmental Statement).
- 1.9 It is right therefore for the Core Strategy to promote employment land provision at the North Yate New Neighbourhood (hereafter NYNN) together with the redevelopment of the Stover Road Industrial Estate / North Road / Badminton Road employment areas, as required by Policies CS30 and CS31 of the Core Strategy. This is a wholly appropriate planned response to addressing the sectoral imbalance of employment opportunities at Yate (a focus on industrial units and warehousing) and the need to provide modern premises to meet future employment land requirements.

- 1.10 Policy CS31 of the Core Strategy identifies that up to 9ha of employment land should be provided at the NYNN. HLD propose a c.5ha business park incorporating B1 and B2 uses, as well as a mix of wider service sector employment generating uses within the proposed local centre, hotel, health and education facilities. This employment generating mix has been informed by specialist economic development advice undertaken by DTZ (see Appendix 15.4 of HLD's North Yate Environmental Statement). This accords with the approach outlined in para. 17 of the NPPF.
- 1.11 This represents a significant quantum of modern employment space which, together with the redevelopment of the Stover Road Industrial Estate, will provide both a direct response to para. 14.2 of the Core Strategy and will, in qualitative terms, address the employment land supply issues at Yate. Such an approach is consistent with para. 161 of the NPPF.
- 1.12 Therefore, the provision of a greater quantum of employment land than demand evidence would suggest is necessary and justified.

2. *Will the proposed distribution of employment land help to encourage more sustainable lifestyles?*

- 2.1 Our written comments on this matter reflect our position in relation to Matter 7 (Question 1 and 2).
- 2.2 Para. 7 of the NPPF identifies that there are three dimensions to sustainable development, which gives rise to the need for the planning system to perform a number of roles – an economic role, a social role and an environmental role. Paras. 8 to 10 indicate that these should not be taken in isolation and are in fact mutually dependant. Therefore to achieve sustainable development; economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

- 2.3 Plans and decisions should also respond to local circumstances, so that they reflect different opportunities for achieving sustainable development in different areas.
- 2.4 HLD support the strategy for the location of development as set out in Policy CS5 of the Core Strategy, which provides a bespoke policy response for each area of South Gloucestershire, which is influenced by their local characteristics. The policy objectives outlined in Policy CS5 are articulated in more detail in specific policies for each area. These locationally specific policies consider the economic, social and environmental characteristics of each area and how gains to each can be achieved.
- 2.5 In the context of Yate, a significant quantum of future employment land supply at the settlement will be located within the NYNN, which will form part of a strategic, mixed-use development. Such an approach is consistent with the NPPF, which outlines that to ensure that large-scale residential development contributes to the achievement of sustainable development, planning policy should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including working on site (para. 38 refers).
- 2.6 The independent Household Survey of Yate (RD27) identifies that the majority of existing residents work locally (56%), with a further 32% of residents prepared to consider switching to more local employment opportunities. Thus the provision of new employment land within the NYNN, referred to in para 1.10, will broaden the economic base of the town, will assist in encouraging more residents to seek local employment opportunities, and will *ipso facto* encourage more sustainable lifestyles.
- 2.7 The central sustainability merits of the NYNN are identified in HLD's response to Matter 21.
3. ***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?***

- 3.1 As currently drafted, Policy CS12 would only permit employment generating uses on safeguarded sites where no suitable alternative provision has been made in the Core Strategy.
- 3.2 National planning policy outlines that that planning policies should avoid the long term protection of sites for allocated employment use where there is no reasonable prospect of a site being used for that purpose. In such a circumstance, applications for alternative uses should be treated on their own merits, having regard to the market signals and the relative need for different land uses to support sustainable local communities (para. 22 refers).
- 3.3 Accordingly there should be no distinction between safeguarded and non-safeguarded sites within the Core Strategy, with applications for alternative uses being considered through the development management process, at which point the applicant will have to provide the necessary justification. Such an approach would provide flexibility within the Core Strategy to respond to changing market conditions.

4. *Should there be more encouragement for small-scale employment uses in the rural area?*

- 4.1 Para. 28 of the NPPF outlines that planning policies should support economic growth in rural areas in order to create jobs and prosperity. Specifically emerging plans should:
 - Support the sustainable growth and expansion of all types of businesses and enterprise in the rural area, both through the conversion of existing buildings and well-designed new buildings;
 - Promote the development and diversification of agriculture and other land-based rural businesses;
 - Support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside; and
 - Promotes the retention and development of local services and community facilities in villages.

4.2 Accordingly, the Core Strategy should support economic growth in rural areas at a level commensurate with the role and function of each rural settlement and relative to other higher order settlements in the plan area. Such a policy should not distract from the strategy contained within the emerging Core Strategy, which has been found to be the most appropriate when considered against others.

Boyer Planning Limited
May 2012