

Matter 10: Distribution of Economic  
Development Land, Safeguarded and Non  
Safeguarded Employment sites  
Representation No: 4604897

POSITION STATEMENT

MATTER 10

ON BEHALF OF, ENGINEERING AND ALLIED  
HOLDINGS

MAY 2012

127 Hampton Road, Redland  
Bristol  
BS6 6JE

## CONTENTS

Introduction	1
Matter 10 - Question 1	2
Matter 10 - Question 2	2
Matter 10 - Question 3	3

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## Introduction

- 1.1 Origin3 is instructed by Engineering and Allied Holdings to submit this Written Statement in respect of its land interests to the South of Badminton Road, Yate.
- 1.2 South of Badminton Road, Yate is identified for redevelopment and regeneration through Table 2 of Policy CS12 of the Core Strategy (CS).
- 1.3 This statement addresses the relevant questions set out to guide the Matter 10 hearing session. In answering them, this statement also has regard to the recently published National Planning Policy Framework and its relevance to our objections. Question 3 is the most relevant to our submissions, although there is a correlation with Questions 1 and 2.
- 1.4 Our objection relates to the manner in which Policy CS12 continues to safeguard employment sites which are identified as needing change, but only through an SPD or Concept Statement route. Such bureaucratic hurdles make the policy an ineffective tool for securing timely site regeneration which runs contrary to the thrust of Government Planning and Treasury Policy.
- 1.5 Initially the most appropriate modification would appear to be the removal of the Table 2 sites from Policy CS12. However, this would leave the sites subject to Policy CS13 and the overriding test of whether there is an economic need. Such a test is not the main driver for change in relation to the sites listed in Table 2. For example the driver for change at South of Badminton Road is the need to regenerate the western gateway to Yate (Policy CS30) and a recognition that this may only be achieved through a mixture of uses, some of which will not fall within Use Class B.
- 1.6 The modification therefore sought is the removal of the following wording from policy CS12:

*“Sites identified in Table 2 will be safeguarded by this policy until their future use is resolved through endorsed Concept Statements or the Sites and Policies DPD”*

1.7 And its replacement with:

*“The redevelopment of sites identified in Table 2, for non-B class uses will be supported where it fulfils specific objectives of the Core Strategy, or Sites and Policies DPD or endorsed Concept Statement.”*

This amendment allows for consequential changes to sites referred to in paragraph 9.13 of the CS where clear regeneration objectives already exist and removes the unjustified bureaucratic barrier to their development.

**Question 1: Is the amount of employment land provision sufficient to support the economic growth of the sub region over the plan period?**

1.8 Origin3 has not critically assessed the overall level of employment provision across South Gloucestershire. However, it is noted that the land quantum figures in Policy CS11 have been modified to exclude those sites listed in Table 2 of Policy CS12 from the overall provision of employment land.

1.9 These sites are not expected to contribute to the identified land-bank of employment sites in order to fulfil stated economic growth aspirations of the sub-region.

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

1.10 The Core Strategy distributes the greatest levels of employment provision towards the North Bristol Fringe (442 ha), East Bristol Fringe (147 ha) and Severnside (635 ha) with noticeable contributions also at Emerson’s Green, Kingswood and Yate.

1.11 With reference specifically to Yate, the Council’s Stage 1 Employment Land Review (2010) indicates that the town has an unusually high level

(127.7 ha) of employment land for the size of the settlement (paragraph 5.8). This is dominated by general/ industrial sites predominantly to the west of the town.

1.12 The Employment Land Survey (Stage 2) indicates that to the west of Yate many of the existing employment areas are falling short of modern business requirements suggesting that the area's uses may not be sustained through the current and forthcoming planning period due to the presence of larger, higher-quality and more accessible facilities available elsewhere (at Severnside and Emersons Green which have available land (paragraph 6.15)).

1.13 In terms of future employment projections, the Stage 2 Employment Land Survey reports that non B-Class uses are projected to increase substantially up to 2026 whilst warehousing and B-class uses other than offices are estimated to stagnate (paragraph 4.4). When translated into demand for land, the Stage 2 Employment Land Survey indicates (Table 7) that only 6ha of industrial land is predicted to be required for industrial uses across the whole District in the period to 2026. The Stage 3 Report suggests the Council's future employment land policies should remain consistent with this scenario and for Yate recommends widening the employment base and maximising diversity in types of jobs (paragraph 3.24). In the context of the NPPF and the Treasury policy document, Plan for Growth (March 2011), economic growth in its widest sense should be encouraged and not limited simply to protecting sites for B class uses.

1.14 In light of the above findings of the Employment Land Survey, the proposed distribution of employment land at Yate within the initial versions of the Core Strategy was considered to be too restrictive. As such, the Council accepted major change was required on some sites to the west of the town and through amendments to Policy CS12 has sought to plan for alternative forms of economic development on these, including land to the south of Badminton Road. This approach to planning for wider economic development and regeneration is

supported by NPPF, but the restrictive mechanisms for achieving this are not.

1.15 With reference to sustainable lifestyles, the golden thread running through the NPPF is the presumption in favour of sustainable development whereby economic, social and environmental gains are sought jointly through the planning system (paragraph 8). This involves making it easier for jobs to be created in towns (paragraph 9), responding positively to wider opportunities for growth (paragraph 17), actively managing patterns of growth to make the fullest possible use public transport (paragraph 17) and taking account of whether existing business sectors are expanding or contracting and planning for emerging industries locally (paragraph 21). Regeneration of the sites contained within Table 2 of Policy CS12 could assist in diversifying local employment bases, for a mixture of B-class and non B-class uses, allowing a greater range of employment opportunities for a wider cross section of local people. This would improve the opportunity for employees to live closer to their workplace and thus encouraging sustainable lifestyles. The recommended modification to the wording of Policy CS12 will allow greater flexibility in the Core Strategy to facilitate economic growth and sustainable lifestyles without delay.

**Question 3: The distinction between safeguarded and non-safeguarded sites appears to reduce flexibility within the CS to allow for changing circumstances. Is this distinction necessary or desirable?**

1.16 Policy CS12 of the Core Strategy identifies specific sites safeguarded for economic development. This Policy within the Proposed Changes document and subsequent versions of the Core Strategy thereafter recognise the need for major change on land to the south of Badminton Road (amongst other locations) allowing opportunities for alternative uses to improve and diversify the range and amount of jobs at this location. The Policy, along with Policy CS30 which included the site within the 'Regeneration Opportunity' area for Yate, sought to facilitate positive economic regeneration at this location. The objectives of these

policies are to create a more attractive western gateway to Yate whilst extending the town outwards and making better use of the railway station. Whilst this type of approach is supported by the NPPF the mechanism for achieving it is inappropriate and not justified or effective. This interim employment land safeguarding approach introduces significant uncertainty and presents an unnecessary tier of bureaucracy to new economic development and regeneration which the Coalition Government has actively sought to reduce through the NPPF.

- 1.17 The NPPF states at paragraph 14 that local planning authorities should positively seek to meet the development needs of their area allowing sufficient flexibility to adapt to rapid change in economic circumstances. This cannot be achieved through Policy CS12 as submitted.
- 1.18 According to the Council's Local Development Scheme (2012), the Sites and Policies DPD is not scheduled to be adopted until 2015. Whereas the Concept Statement process contained within the Council's Statement of Community Involvement is time consuming and the same outcomes could equally be achieved through the preparation stages of a planning application, as encouraged in paragraph 188 of the NPPF. Neither of the processes endorsed within Policy CS12 provide sufficient flexibility to allow for changes in market or site specific circumstances. For example, the policy will not flexibly or speedily react to the realistic future trend that heavy industrial employment in Yate will stagnate over the plan period as potential occupiers prefer to locate at more suitable facilities available elsewhere in the South Gloucestershire, (as described in the Employment Land Survey (2010)).
- 1.19 The interim safeguarding policy approach towards employment sites listed within Table 2 of Policy CS12 creates an unnecessary, additional tier of control and, is not in conformity with the provisions of the NPPF which requires local plans to be flexible enough to react to rapid market change. The adaptation of the pre-text to Table 2 will ensure that the Council's own proposals for major change, such as that described in

Policy CS30 for land south of Badminton Road can be facilitated without delay.

1.20 Whilst NPPF supports the Council's aspiration to facilitate economic regeneration on land to the south of Badminton Road, Policy CS12 does not efficiently or positively achieve this objective. Therefore, with reference to the tests of soundness set out within paragraph 182 of the NPPF, Policy CS12 is not sound on the grounds that:

- It is not positively prepared as it delays the regeneration of sites for alternative and diverse economic uses through a restrictive and enduring interim safeguarding approach.
- By including accepted regeneration sites with a restrictive secondary list of interim protected employment sites, the most appropriate strategy for delivering sustainable development is not being achieved. It is therefore not justified.
- The potential unnecessary delays concerned with waiting for the endorsement of Concept Statements or adoption of the distant Sites and Policies DPD is an uncertain and possibly undeliverable policy approach. It is therefore not effective.
- The delay of economic growth does not accord with the NPPF's presumption in favour of sustainable development and is therefore not consistent with national policy.

1.21 The following modification to the wording contained within Policy CS12 relating to sites listed in Table 2 is proposed:

***"The redevelopment of sites identified in Table 2, for non-B class uses will be supported where it fulfils specific objectives of the Core Strategy, or Sites and Policies DPD or endorsed Concept Statement."***

1.22 This modification allows the identified sites within Table 2 to come forward for development through the planning application process whilst still continuing to meet the objectives of the Core Strategy. This modification provides the Core Strategy with the flexibility to respond to

changing circumstances rapidly as it is intended to do. Identified regeneration sites can come forward more speedily whilst continuing to achieve the same level of detail that the Concept Statement process would through extensive pre application consultation. This modification responds positively to wider opportunities for sustainable growth in South Gloucestershire.