

PPG3 para 42a Consideration of Redundant Employment Land; Interim Interpretation Statement by South Bucks District Council

1. The Government has published a short statement that is now incorporated into PPG3 Housing, as paragraph 42a. The paragraph sets out guidance to Councils when considering planning applications to redevelop any undeveloped (surplus) allocated industrial / commercial land, or other possibly redundant land or buildings in industrial / commercial use, for housing. To provide the evidence base to reach these conclusions, the Government expects Councils to carry out Employment Land Reviews. The Government's intention in a national context is to avoid land that is unlikely to be used or reused for industrial / commercial purposes remaining idle, when it may be suited to help meet housing land requirements.

2. South Bucks District Council's current strategy (as set out in its adopted Local Plan) is to maintain the stock of employment sites in the District, whilst not adding to them. This is intended to maintain the strength of the local economy. Sites may be able to be redeveloped for continuing employment use, but no new sites are to be developed for Green Belt reasons - which require a firm restraint on development. The strategy applies both to allocated sites (shown on the Local Plan Proposals Map) and to other existing sites in industrial / commercial use. The District has a broad jobs / workforce balance, although a high percentage of residents commute out of the District to work, whilst a similar percentage of those working in the District commute in from homes elsewhere.

3. The Council's Local Development Scheme under the new Planning and Compulsory Purchase Act 2004 sets out the Council's intention to prepare a Core Strategy Local Development Document (LDD), to replace its present Local Plan, over the period 2005-08. In the short term the Council is improving its evidence base on various aspects of the local economy. This will serve to cover essential Employment Land Review work, taken together with the findings of recent consultancy studies at either the regional or local level, including any updating of findings that may be undertaken. The Bucks Economic Prospects Study published in 2003 projected a shortfall of industrial land by 2016 but a small surplus of commercial land - this assumed that all outstanding permissions would be implemented, including the redevelopment of the former Sandersons' premises at New Denham for B1 purposes. Another study advised that a very small release of industrial land could be supported (though this has now occurred).

4. The Council is also preparing an Urban Capacity Potential Study which is scoped to include consideration of the housing development potential of particular industrial / commercial sites within the settlement areas excluded from the Green Belt, in the event of relevant policy change being incorporated into the Core Strategy LDD.

5. New Regional guidance will be contained in the draft South East Plan (Regional Spatial Strategy). A support paper considering the Economy of the Western Corridor / Blackwater Valley sub-region of the South East, and the implications of growth, is in preparation and may include conclusions relating to the broad need for land. The initial paper submitted to SEERA concludes that there will be no need to identify further employment land in the sub-region as a whole - due to changing patterns both in economic investment and the more effective use of existing land, and in the approach to work. Increasingly sophisticated information technology underlies both trends including the potential for the successful running of home-based businesses.

6. The Council needs also to be mindful of the Bucks Economic Prospects Study which indicates a shortfall in industrial space within the District during the coming decade, including in particular starter ("incubator") units. The Council is now to commission, with other adjacent local authorities, a new study looking at employment needs for the Core Strategy period to 2021. It will be important that this has regard to the sub regional context provided by the work being undertaken in the sub regional context mentioned earlier.

7. As a Green Belt area in the country's most prosperous region, sites in South Bucks once lost from industrial / commercial use would be very difficult to replace, and available premises of the type sought may be difficult to find. Few available premises in the District

remain available for more than two years. It is important for sustainability to retain a broad range and balance between jobs and workforce for the future, including the opportunity for individuals to take a more local job to reduce commuting distances and to have consumer industrial services locally available.

8. In interpreting paragraph 42a prior to completion of its new Core Strategy LDD (and any Employment Land Review), therefore, the Council will consider the question of redundancy of land or premises in terms of whether a site may be likely to be usable by another industrial / commercial company either in its present form or with any redevelopment that may be acceptable to be permitted. Since many existing sites are in the Green Belt it will also give very careful regard to the tests of paragraphs 31/32 in PPG3 and continue to apply the other usual tests that relate to proposed development in the Green Belt.

9. Regard will continue to be had to regional and local strategies for economic development. Allocated and other strategic areas in particular are unlikely to become regarded as surplus to requirements, having regard to projections of future need, and there are no allocated areas awaiting first development.

10. Within urban areas, underused industrial / commercial sites within residential areas, or conservation areas, can result in amenity or environmental impacts that may not be resolvable by redevelopment for another industrial / commercial use. Unless the impacts are unresolvable or so severe as to require a more immediate determination, in such instances a **marketing test would be appropriate to see whether a satisfactory alternative occupier is able to be found**, at least prior to any new policy provisions being published for the Core Strategy LDD.

11. The Council considers a marketing period of 12 months to be appropriate to test whether a property is evidentially redundant to the wider employment market, prior to the consideration of any application for a different use. Applicants should submit a marketing report with their application, to include evidence relating to the content, terms and dates of marketing, a summary of enquiries and of any reasons given why the enquiries did not proceed to contract.

12. In other respects, it may be appropriate under the Guidance to release a very small amount of non-strategic, freestanding and poorly viable sites in urban areas, whose loss would not undermine the commercial ambience of an area or the quantum of supply likely to be required to 2021, and where other equivalent property may be available in that same area, perhaps more centrally. However, it would be unwise to allow the redevelopment of anything other than a very small amount of employment land in the interim period prior to the completion of the Core Strategy LDD - since if the forthcoming study or the final adopted Core Strategy (following Public Examination) indicate a need for significant floorspace growth over the period to 2021 which could not be met by the more intensive redevelopment of existing sites, then this would probably result in the Council having to consider further employment development in Green belt locations.

13. In Green Belt areas, residential redevelopment will continue to be unlikely to be appropriate. However, although the Council does not currently operate a policy to exceptionally permit affordable housing on sites where market housing would not be permitted, all Councils are now expected under replacement paragraph 18 to PPG3 to operate such a policy. There may or may not be a very limited number of sites in or adjoining smaller rural settlements in designated rural areas, where such an approach may have benefits for both the owner or occupier, in meeting particular and identified local needs for affordable housing on an exception basis. This is likely to be another matter also for consideration during the preparation of the District's Core Strategy LDD.

14. It may become appropriate to review this statement when technical studies including Employment Land Review have been advanced, and/or when preparation of the Core Strategy LDD has reached the stage of preferred options being published for public consultation and consideration of responses.