

Council response to JVH Statement on Matter 10 Employment, Theme 2, Policy EC7

Offices are included in the NPPF definition of “main town centre uses” (Annex 2: Glossary). The NPPF states that local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date development plan (paragraph 24). Furthermore, applications for retail, leisure and office development over a locally set threshold outside town centres should be subject to an impact assessment (paragraph 26).

Policy EC1 of the Submission Local Plan sets out the main town centre uses hierarchy and locally set floorspace thresholds. In accordance with the NPPF, a town centre first approach is taken, followed by local and then neighbourhood centres. The Council’s commitment to the town centre as a priority location for uses which include offices (B1a and A2) is clear from this policy.

In terms of uses in the strategic employment areas, Policy EC7 aims to protect existing and proposed employment land for employment generating uses in use classes B1 (b, c), B2 and B8. As set out in the Council’s hearing statement (HS.05, paragraph 10.4.3) the local economy remains vulnerable and the supply of available employment land is limited. As a result, further loss to other uses over the plan period will limit the ability of businesses to expand. Furthermore, if the uses are main town centre uses including offices (A2 and B1a), this is likely to impact on the town centre, local and neighbourhood centres. It is therefore important to give priority to B1 (b, c), B2 and B8 uses in the strategic employment areas.

The Council considers that Policy EC7 provides sufficient flexibility to consider applications for non-B1 (b, c), B2 and B8 uses in strategic employment areas on the satisfaction of criteria a) to d). When an application is received for non-B1 (b, c), B2 and B8 uses in strategic employment areas the applicant will be expected to undertake the following steps:

1. Comply with the sequential test where town centre uses are involved (Policy EC1).
2. Undertake an impact assessment where development falls into the appropriate size threshold (Policy EC1).
3. Satisfy criteria a) – d) in Policy EC7. In particular, applications will be required to demonstrate that the site is no longer attractive to the market having been marketed for a minimum of 12 months (as proposed in the Council’s proposed main modification MOD076), and that there will be no negative impact on the vitality, viability and function of the strategic employment area or centres (including the town centre).

The Council does not consider that it is necessary or appropriate to include the additional criterion suggested by JVH because the Council’s position on town centre uses and protecting the strategic employment areas is clear. The town centre is the preferred location for main town centre uses which include

offices (B1a and A2) and the strategic employment areas should be protected for B1 (b, c), B2 and B8.

JVH makes the point that non-B1 (b, c), B2 and B8 may be capable of generating more jobs than those uses, however, it would be difficult to estimate job numbers on a speculative build and outline applications.