Borough of Redditch

Supplementary Planning Guidance
Employment Land Monitoring

Approved May 2003

REDDITCH BOROUGH COUNCIL

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1.0 INTRODUCTION

1.1 On the 17th June 2002 Officers from Worcestershire County Council prepared a document entitled "WORCESTERSHIRE EMPLOYMENT LAND DATABASE - Guidance Notes for use in Monitoring the County Structure Plan Employment policies" (see appendix A). The purpose of this document was to respond to requests for clarification from Worcestershire's district councils about identifying exactly what types of sites/buildings contribute to meeting the employment land provisions set out in Worcestershire County Structure Plan Policy D.19. The guidance notes were distributed to all districts at the County-wide employment land monitoring working group at a meeting of this working group held at County Hall on 25th June 2002. This document has to date been used by districts when preparing their Local Plans and has been used at the Worcester City Local Plan inquiry.

1.2 After the Worcestershire County Council guidance notes had been received it was clear that Redditch Borough Council's method of calculating which sites/buildings may or may not be used to off-set the Structure Plan target, was not in full accordance. Indeed, after informal discussions, Worcestershire County Council wrote to Redditch Borough Council stating that the current methodology was "…clearly erroneous." (see appendix B). In response to the guidance and the letter received from the County Council and as part of the Local Plan review, it was considered appropriate for Redditch Borough Council to set out clear notes about meeting the Structure Plan employment target in accordance with Structure Plan Policy D20 (see appendix C).

1.3 Redditch Borough Council (Officers) considered it appropriate to further supplement/interpret the Worcestershire County Council Guidance Notes. This is in order to provide more detail at the local level with regard to identifying employment sites that contribute to meeting the Structure Plan employment target for Redditch consistent with County-wide methodology. It was considered that Redditch Borough Council comments should be incorporated into the Worcestershire County Council Guidance Notes rather than producing a separate document. This allows for local interpretation and analysis to be presented in the context of County guidance. However, to make the origin of each part clear Worcestershire County Council text is printed in black and the supplementary information provided by Redditch Borough Council is in blue.

2.0 Guidance Notes on implementing the County Structure Plan Employment policies in Borough of Redditch Local Plan No.3

2.1 Definitions

Gross site area
The total area of the planning application, planning permission, or local plan allocation. This is the area that counts towards meeting the structure plan employment land allocations and may include car parking, estate roads and incidental landscaping. It does not include large spaces, for example significant landscape buffer strips.

2.2 Zoned land
Land identified in a district local plan where B class employment uses are suitable. It may be occupied, or vacant; be greenfield or brownfield; have planning permission or be a local plan allocation for employment.

2.3 Local plan allocation
An area of land identified in a district local plan review for Class B employment uses that contributes towards meeting the structure plan employment requirements of the district. It may be part of an existing industrial estate or it may be a new allocation. It may be a greenfield site or a previously developed site.

2.4 Vacant employment land
Land or buildings that were formerly occupied by B Class employment uses and are now redundant.

2.5 Such sites may be suitable for re-use as employment land and contribute to meeting the structure plan employment land allocations and employment land portfolio, provided they meet the provisions of County Structure Plan Policies SD6 and SD7. The land may have been vacant at the beginning of the structure plan period (1996) or become vacant during the structure plan period. Where appropriate, vacant land, whether formerly in employment use or not, may be recycled for employment.

2.6 Note: Buildings occupied by B class uses at the time of the review of the local plan should not be included for the purposes of County Structure Plan Policy D23 (review of existing employment commitments) unless the local planning authority are satisfied that the land and buildings will *become vacant* and is not expected to be reoccupied during the local plan period. (Structure Plan EM para 6.75).

2.7 To be included as a contribution towards the structure plan target sites need to constitute a "new" employment opportunity i.e. being "brought back" into employment use in accordance with Structure Plan Policy D.21. Consequently, in some cases, the re-development of an employment site for employment purposes does not represent a "new" employment opportunity and therefore should not be used to offset the Structure Plan Target for the period 1996-2011.

2.8 This obviously raises the issue of when is a "new" employment use created that can be used to meet the Structure Plan target. The Borough Council has identified the following two categories of vacant employment land to make this distinction.

2.9 Unoccupied employment land and buildings
Land or buildings with existing B Class use rights which are not in full productive use but for which there is a reasonable expectation of reoccupation for B Class use (of existing or new buildings). Such sites are not yet considered to be redundant (see definition of 'redundant' given below) (regardless of state of buildings/land).

2.10 Redundant employment land

Land or buildings that meet all of the following criteria (regardless of state of buildings/land);

- formerly occupied by B Class employment uses; and
- totally unoccupied for a minimum of 2 years and 3 months (For information - the figure of a minimum of 2 years and 3 months was decided upon because it seemed to be a reasonable length of time for a site to lie vacant in order for it to truly reflect a genuine new employment opportunity. Information from the Borough Council's Economic Development Unit suggests that it takes approximately 407 days to market and find a new owner for an employment site (see Appendix D). The Development Plans team considers it appropriate to double this figure to ensure that only genuine new employment opportunities are counted).

2.11 Unoccupied employment land and buildings / Redundant employment land – offsetting the Structure Plan target

Redditch Borough Council holds the view that unoccupied employment land and buildings as defined above does not count towards the Structure Plan target whilst redundant employment land can be used as a contribution towards the Structure Plan target.

2.12 Employment element of Mixed use sites

The Borough Council considers it reasonable that employment elements of mixed use sites be used to offset the Structure Plan target. This will be conducted in accordance with the following two categories of mixed use sites.

Windfall Mixed use sites

Where a B Class use is located within a mixed use site the gross site area within the curtilage of the B Class use will be counted.

Allocated Mixed use sites

Where a local plan allocation is made for a mixed use site a minimum area to be developed for employment purposes will be identified (where applicable) and included in the Local Plan list of allocations to offset the Structure Plan target.

2.13 Previously developed land

Land which is or was occupied by a permanent (non agricultural) structure, and associated fixed surface infrastructure.

2.14 Clarification of whether or not land would count towards meeting structure plan employment land provisions – some examples.

A company vacates a site. It becomes vacant employment land and is redeveloped for B class employment uses. Does the site count towards the structure plan allocations?
Answer – yes. The site is previously developed land and would contribute to meeting Structure plan policies D19 and 20.

2.15 A site is in use by a company who temporarily vacates the site whilst it is redeveloped and the same company reoccupies the site. Does the site count towards the structure plan allocations?
Answer – no. The site was never redundant.
Would it count if a different company occupies the site following its redevelopment?
Answer – no. The site was never redundant.

2.16 A company occupies a 1 ha site which is part of a larger parcel of land of 5ha with planning permission for B class uses (it may be allocated land) where the remaining 4ha are unoccupied either because it has never been developed or is currently occupied by vacant buildings. The whole area is redeveloped for employment and the company re-occupies its re-developed site as part of the total redevelopment.
Does the whole 5ha count towards the structure plan district total?
Answer – no. Only the 4ha part of the site counts towards the structure plan total. The 1ha site was never redundant and therefore is not recycled vacant employment land.

2.17 Employment land is 'lost' to other land uses during the plan period through company closure and subsequent re-use/redevelopment for other and uses. Should the amount of land lost to other uses be replaced over and above the structure plan employment land allocations?
Answer – no.

2.18 Redditch Borough Council will apply the following criteria in assessing whether employment land would count towards its employment land target as set out in the Worcestershire Structure Plan. The following will apply to all lands whether zoned purple (Proposals Map representation of land zoned for primarily employment uses, cross-referenced to relevant Local Plan Policy) or not;

(i) Redundant employment land (as defined above) – treated as new site (allocation) and gross site area (as defined above) counted towards target

N.B. Development of employment land that is merely unoccupied (and not 'redundant') is **not** counted as new development and therefore does not count towards the target.

(ii) New development on greenfield site – treated as new site (allocation/windfall) and gross site area (as defined above) counted towards target

(iii) New development on previously developed land (as defined above) not used by B Class uses previously – treated as new site and gross site area (as defined above) counted towards target

(iv) Change of Use from non B Class uses to B Class use to be counted as new development and gross site area (as defined above) counted towards target

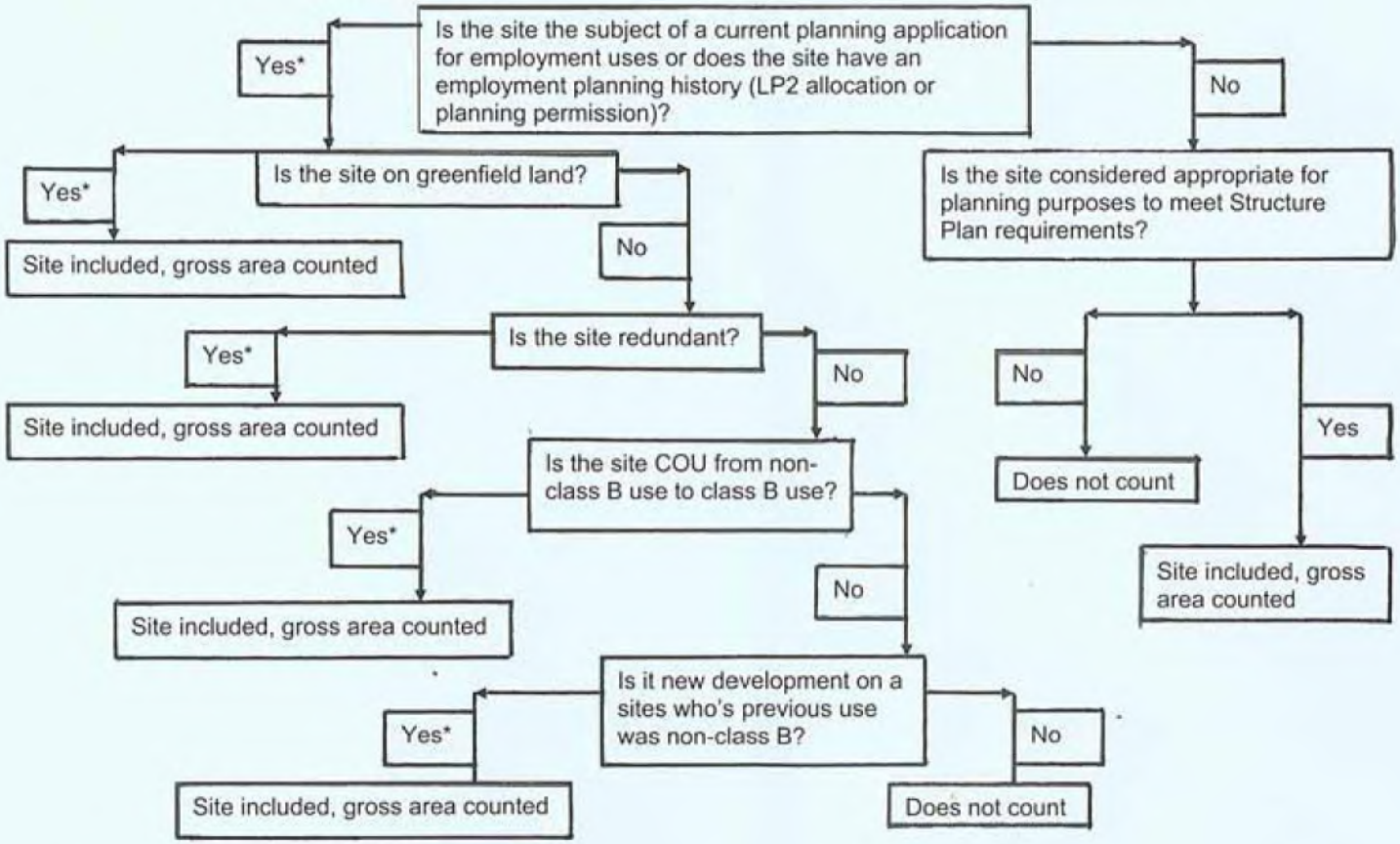
2.19 Losses

(i) Zoned land and other piecemeal employment land lost will be monitored for the purposes of implementing employment land protection policy

(ii) Losses to zoned land that is an allocation will be monitored. All such losses will need to be replaced within the Plan Period (via review/partial review of LP).

2.20 The following diagram entitled 'BORLP No.3 flow chart for showing how sites will be assessed' has been produced by Redditch Borough Council in order to clearly identify the criteria to be used in assessing whether employment land would count towards its employment land target as set out in the Worcestershire Structure Plan.

BORLP No.3 flow chart for showing how sites will be assessed



*In order to be counted each site will have to satisfy the following question - Is the site considered appropriate for planning purposes to meet Structure Plan requirements? This will be assessed in accordance with Structure Plan Policy D.23.

Appendix A

WORCESTERSHIRE EMPLOYMENT LAND DATABASE

Guidance Notes for use in Monitoring the County Structure Plan Employment policies

Definitions

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Local plan allocation
An area of land identified in a district local plan review for Class B employment uses that contributes towards meeting the structure plan employment requirements of the district. It may be part of an existing industrial estate or it may be a new allocation. It may be a greenfield site or a previously developed site.

Vacant employment land
Land or buildings that were formerly occupied by B Class employment uses and are now redundant.

Such sites may be suitable for re-use as employment land and contribute to meeting the structure plan employment land allocations and employment land portfolio, provided they meet the provisions of County Structure Plan Policies SD6 and SD7. The land may have been vacant at the beginning of the structure plan period (1996) or become vacant during the structure plan period. Where appropriate, vacant land, whether formerly in employment use or not, may be recycled for employment.

Note: Buildings occupied by B class uses at the time of the review of the local plan should not be included for the purposes of County Structure Plan Policy D23 (review of existing employment commitments) unless the local planning authority are satisfied that the land and buildings will *become vacant* and is not expected to be reoccupied during the local plan period. (Structure Plan EM para 6.75).

Previously developed land
Land which is or was occupied by a permanent (non agricultural) structure, and associated fixed surface infrastructure.

Clarification of whether or not land would count towards meeting structure plan employment land provisions - some examples.

A company vacates a site. It becomes vacant employment land and is redeveloped for B class employment uses. Does the site count towards the structure plan allocations?

Answer - yes. The site is previously developed land and would contribute to meeting Structure plan policies D19 and 20.

A site is in use by a company which temporarily vacates the site whilst it is redeveloped and the same company reoccupies the site. Does the site count towards the structure plan allocations?
Answer - no. The site was never redundant.
Would it count if a *different* company occupies the site following its redevelopment?
Answer - no. The site was never redundant.

A company occupies a 1 ha site which is part of a larger parcel of land of 5ha with planning permission for B class uses (it may be allocated land) where the remaining 4ha are unoccupied either because it has never been developed or is currently occupied by vacant buildings. The whole area is redeveloped for employment and the company re-occupies its re-developed site as part of the total redevelopment. Does the whole 5ha count towards the structure plan district total?
Answer - no. Only the 4ha part of the site counts towards the structure plan total. The 1ha site was never redundant and therefore is not recycled vacant employment land.

Employment land is 'lost' to other land uses during the plan period through company closure and subsequent re-use/redevelopment for other land uses. Should the amount of land lost to other uses be replaced over and above the structure plan employment land allocations?
Answer - no.

Stewart Maxwell

17 June 2002

Appendix B

worcestershire

Mrs R Bamford
Development Plans Section
Redditch Borough Council
Town Hall
Alcester Street
REDDITCH, B98 8AH

1 October 2002

Our ref: SP.6013/JSM/JB
Ask for: Stewart Maxwell

Dear Ruth

WORCESTERSHIRE COUNTY STRUCTURE PLAN 1996-2011
INTERPRETATION OF ECONOMIC DEVELOPMENT POLICIES

Further to my letter to Alison Grimmett on 20 September 2002, you asked by telephone for additional clarification as to whether all redevelopment sites, where suitable, should count towards meeting the provisions of Worcestershire County Structure Plan Policies D19 and D20 as historically Redditch Borough Council have included redevelopment sites over 200 sq. metres irrespective of whether they were occupied or vacant at the time of redevelopment.

Paragraph 6.67 of the Explanatory Memorandum to Policy D20 states "The policy seeks to ensure that previously developed land in urban areas is brought back into productive use for employment, where this is a suitable use of the site, in order to encourage urban regeneration, help reduce the need to travel and make the best use of existing infrastructure." (my emphasis). It follows from this explanation of the purpose of the policy that the redevelopment of previously developed land actually in productive use (i.e. occupied) should not count towards meeting the provisions of the policy. Only vacant previously developed land which is redundant, where suitable, should be included to meet the Structure Plan employment land requirements.

In this regard it should be noted that the equivalent policy to Policy D20 in the now superseded Hereford and Worcester County Structure Plan 1986-2001 is Policy E.2. This states:

"Policy E.2 – To ensure that there is sufficient land available to meet the needs of Class B employment uses in the County. This will require the provision of a

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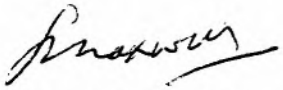
range of sites in terms of size, location and quality including the redevelopment or re-use, where appropriate, of vacant industrial sites." (my emphasis)

The inclusion by the Borough Council of previously developed sites which were not vacant at the time of redevelopment to meet the provisions of this policy was clearly erroneous.

Yours sincerely



Stewart Maxwell

Appendix C

Worcestershire County Structure Plan 1996-2011

CHAPTER SIX - DEVELOPMENT

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Employment Land Portfolio
Policy D.20

The employment land to be provided in each District under Policy D.19 will comprise a portfolio of sites in terms of size, location and quality, including the redevelopment and reuse, where appropriate, of previously developed land.

Explanatory Memorandum

6.67 Regional Planning Guidance (RPG11) indicates that strategic authorities should develop a portfolio of sites as part of the Structure Plan process. Policy D.20 accords with this by making provision for a range of sites in each District in order to meet the differing requirements of new and existing businesses, both local and potential inward investors. The policy seeks to ensure that previously developed land in urban areas is brought back (Redditch Borough Council emphasis) into productive use for employment, where this is a suitable use of the site, in order to encourage urban regeneration, help reduce the need to travel and make the best use of existing infrastructure. There should be a reasonable expectation that land identified in accordance with this policy will be readily capable of being developed during the plan period in order that a genuine contribution is made to the achievement of the economic strategy.

6.68 In determining the appropriate portfolio of sites, local planning authorities may consider the need for quality greenfield sites. Reference should be made to the Explanatory Memorandum to Policy SD.7 which makes provision for their consideration. In assessing the appropriate employment land portfolio, District Councils should have regard to local employment needs, particularly in rural areas.

Appendix D

REDDITCH BOROUGH COUNCIL

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Memorandum

To: Lucinda Carter

Rachel Underwood

07/02/03

Re: Employment Land Policy

Between 01/01/97 and 31/01/03, 75% ofcommercial properties on our database were let within 407 days. The shortest time that a property has been on our database is 5 days with the longest period of time being 1900 days.

Regards,

Rachel Underwood

Appendix E

worcestershire
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Lucinda Carter
Planning Officer
Development Plans
Redditch Borough Council
Town Hall, Alcester Street
REDDITCH
Worcs. B98 8AH

18 February 2003

Our ref: SP.6013/JSM/JB
Your ref: P360 LP(2)
Ask for: Stewart Maxwell

Dear Lucinda

BORLP NO. 3 BACKGROUND PAPER EMPLOYMENT GUIDANCE NOTES

I refer to your letter of 11 February 2003 inviting the County Council's approval/ support for the above document.

It is the view of County Council officers that the interpretation and clarifications of the County Council's Worcestershire Employment Land Database Guidance Notes included as blue text in the background paper are generally reasonable.

With respect to the time period that employment land/buildings remain unoccupied before a site can be considered vacant, and therefore could count towards meeting the County Structure Plan employment allocations, County Council officers do not consider that it would be appropriate to have a view. The County Council's guidance notes are for use throughout the County. No time period is included in them because this would prevent flexibility at district level to reflect local circumstances. Indeed as you indicate in your letter, the background paper is intended to provide clarification at the local level about which sites should be identified in the Local Plan to help meet the Structure Plan target. Consequently it will be for the Borough Council to justify its position on this matter as set out in the background paper, should objections be made to it.

Yours sincerely

Stewart Maxwell

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Principal Planner - Strategy
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