

## ECONOMIC STATEMENT

### Revision 1 (November 2023)

- 1.1 This statement should be read in conjunction with the Planning Statement by Rapleys and the Economic Benefits Statement by Ekosgen.

#### **Existing Site & Jobs**

- 1.2 The application site measures approximately 0.83ha. It contains two industrial / warehouse buildings which have a combined GIA of 2,615sq.m, along with associated yard space. The existing buildings are in Class B8 (warehousing and distribution) use and provide approximately 20-25 full time equivalent (FTE) jobs. As such, the current arrangement offers a low density of employment uses.

#### **Proposed Development & Job Creation**

- 1.3 The proposed development will provide 1,919 sqm (GIA) of employment, commercial and community floorspace, comprising:

- Light Industrial Maker Spaces – 1,015 sqm (Class E(g)(iii))
- Flexible Industrial Space – Class E(g)(iii) / Class B8 / Sui Generis
- Local food store – 450 sqm (Use Class E(a) / Class E(g)(iii))
- Flexible commercial space – 135 sqm (Use Class E(b-g))
- Flexible community space – 175 sqm (Sui Generis)

- 1.4 The proposed student development is estimated to provide up to 10 FTE jobs (reception staff, maintenance and housekeeping), while the proposed ground floor uses identified above will create circa 65-75 FTE jobs. Overall, this will result in total job creation of circa 75 – 85 FTE jobs and a net gain of 50-60 FTE jobs<sup>1</sup>. In addition, the proposed development will indirectly support local employment through supply chain purchases. Ekosgen estimates that the proposed development could support a further 40 FTE jobs in the South West region, compared with 15 FTE jobs supported in this region by the current site uses.

#### **Planning Policy**

- 1.5 Policy BCS8 of the Core Strategy states that Principal Industrial and Warehousing Areas (PIWAs) will be identified and retained for industrial and warehousing uses.
- 1.6 Policy BCAP7 seeks to retain employment sites in Old Market & The Dings for employment use unless it can be demonstrated that:

*i. There is no demand for employment uses; or*

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<sup>1</sup> Please refer to the Economic Benefits Statement for further details & calculations.

*ii. Continued employment use would have an unacceptable impact on the environmental quality of the surrounding area; or*

*iii. A net reduction in floorspace is necessary to improve the existing premises; or*

*iv. It is to be used for industrial or commercial training purposes.*

1.7 It is notable that the policy does not specifically refer to PIWA land.

1.8 Policy DM13 of the Development Management Policies provides more detailed criteria for development on PIWA land. It states:

*In addition to industry and warehousing (Use Classes B1b-B8 and sui generis uses of a similar nature), the following uses are also likely to be acceptable on Principal Industrial and Warehousing Areas shown on the Policies Map subject to other relevant development plan policies being satisfied:*

*Industrial or commercial training facilities;*

*Community facilities;*

*Specialised leisure uses which cannot be accommodated in centres because of their scale and / or operational impacts;*

*Essential public utilities development; and*

*Ancillary facilities and services which support the functioning of the Principal Industrial and Warehousing Area including child care facilities, small-scale retail uses, sandwich shops and cafés.*

*Development involving the loss of industrial and warehousing floorspace within the Principal Industrial and Warehousing Areas shown on the Policies Map will not be permitted unless the development is for a use referred to above, or:*

*i. It is demonstrated that there is no demand for:*

*a. The use of the existing site / premises for industry or warehousing; or*

*b. The redevelopment of the site for new industrial or warehousing premises; and*

*ii. The proposal will not prejudice the function or viability of the rest of the Principal Industrial and Warehousing Area.*

1.9 The Old Market Quarter Neighbourhood Development Plan adopts a more flexible approach to the redevelopment of PIWA land, particularly on the Midland Road / Kingsland Road edge of the PIWA. Policy B5 of Neighbourhood Plan states:

*Policy B5: Within the Principal Industrial and Warehousing Areas defined on Map 5: Policies, proposals for development involving the provision of residential or other non-industrial uses will only be permitted where the site is located on the perimeter of the area so designated,*

*where the use remains predominantly commercial, and where it can be shown that a satisfactory standard of amenity would be provided for any residential occupiers.*

- 1.10 The application site is designated as a Long Term Development Site within the PIWA, as shown on the Neighbourhood Plan map extract below.



Figure 1: Extract from Map 5 of the Old Market Quarter Neighbourhood Development Plan

## Policy Assessment

- 1.11 As set out in Chapter 7 of the Planning Statement, there is potential conflict between the aims of the Old Market Quarter Neighbourhood Development Plan and the older Development Plan documents. In this regard S38 (5) of the Planning and Compulsory Purchase Act 2004, is relevant. It states if, to any extent, a policy contained in a development plan for an area conflict with another policy in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan – in this case, the Old Market Quarter Neighbourhood Development Plan.
- 1.12 As such, the key policy test is considered to be against Policy B5 of the Neighbourhood Plan, the primary elements of which are explored in detail below:

### Perimeter of the PIWA

- 1.13 The application site is located on the edge of the PIWA and is designated as a Long Term Development Site where residential uses will be considered.

### Proposed commercial offer

- 1.14 The proposed development includes 1,919 sqm of commercial floorspace. 1,016 sq.m of this will comprise “maker spaces” including workshops that fall within Class E(g)(iii), 114 sqm will be for a retained tenant (Use Class E(g)(iii)/B8/Sui generis) and 175 sq.m will comprise community space, both of which are compatible with the PIWA as set out in DM13.

1.15 It should be noted that the proposed arrangement of uses has been chosen based on the needs and preferences of local residents and feedback from the community engagement process. The community engagement process identified a significant desire to see workshop spaces (advocated strongly by the Old Market Community Association), as well as a local supermarket and a community space. The site's potential enables the delivery of high-quality student accommodation situated above improved employment and commercial floorspace.

1.16 As explored in the Economic Benefits Statement by Ekosgen, and referenced above, the proposal will result in a net increase of circa 50-60 FTE jobs onsite, alongside other economic benefits and indirect employment opportunities in the wider region. As such, the proposal will boost employment and the local economy, which is ultimately a key objective of PIWA land and the Old Market Neighbourhood Plan. This is a principle which has been accepted in Bristol, notably the approved development at Dalby Avenue and Whitehouse Lane (ref. 20/05811/F), explored further in para 1.22 of this statement.

#### Satisfactory standard of amenity

1.17 The planning application is accompanied by Air Quality and Noise Assessments which demonstrate that, subject to suitable design and construction specifications, the proposed accommodation and its neighbours will enjoy a suitable standard of residential amenity.

#### Other Considerations

1.18 As set out in the accompanying Planning Statement, Bristol City Council is currently unable to demonstrate a five year supply of housing land and has failed to meet recent housing delivery targets (HDT 2021). As such, the "tilted balance" set out at paragraph 11(d) of the NPPF is applicable and planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. As set out in the Economic Benefits Statement by Ekosgen and summarised in the Planning Statement, the benefits of the development are substantial and include:

- 75-85 FTE jobs provided on site (an uplift of 50-60 FTE jobs) and 40 FTE jobs supported offsite.
- Improved public realm, including active frontage to Kingsland Road.
- Improved landscaping and biodiversity.
- Contribution to housing targets and to meeting unmet demand for student accommodation.
- Significant GVA impact during construction and operation of the development.
- £5m annual student spending + £0.4m – 0.6m wider visitor spending.

1.19 If the Tilted Balance is engaged – and it has been on similar applications on PIWA land (see below Stockwood Road example) – it is considered that the loss of a relatively small amount of PIWA floorspace is more-than compensated for by the uplift in jobs and the other economic, social and environmental benefits.

- 1.20 This leads back to the explanatory text for Policy B5 of the Old Market Quarter Neighbourhood Development Plan, which states at para 7.2.5:

*The Neighbourhood Plan supports the principal function of the PIWA's (see Map 5: Policies) and recognises their positive impact on the area through provision of local employment. However, the community also recognises the negative impact that warehousing can have on the vibrancy and attractiveness of the area. The plan therefore supports and augments the approach set out by Bristol City Council in policy DM13 of the Site Allocation's and Development Management Policies document for a more flexible approach to the PIWAs.*

*In Old Market Quarter, this means creating the opportunity for changes on the edges of PIWAs, particularly on Midland Road/Kingsland Road and possibly on Clarence Road, Stapleton Road, Little Ann Street and Little George Street where re-development may be appropriate if it can deliver certain benefits. The plan therefore supports the approach set out by Bristol City Council in the Central Area Plan for development along Midland Road.*

- 1.21 As above, the proposal is considered to deliver “certain benefits” sufficient to justify change on the edge of the PIWA.

### **Relevant Case Studies**

Application ref. 20/05811/F – PIWA site at Dalby Avenue and Whitehouse Lane

- 1.22 This application concerned a site comprising a pay and display car park and two motor trade businesses. The proposal was to redevelop the site to provide mixed use development comprising student accommodation (84 cluster units and amenity spaces) and ground floor business space. There was a loss of PIWA land and a net loss of employment floorspace, however, the LPA determined that the proposal was acceptable and attributed weight to the increased number of jobs offered by the new (albeit reduced) GF business space and diversification of the business offer. In this case the application proposed 628 sqm of flexible employment uses, while resulting in a loss of 1,452 sqm of existing employment uses (a 824 sqm net loss).

Application ref. 21/04414/P - PIWA Land at Stockwood Road

- 1.23 This application concerned a PIWA site used as a car sales business. Outline planning permission was sought for a care complex (Use Class C2) with associated works. Although the proposed use is not typically suitable on PIWA land, the LPA determined that it was acceptable and granted permission. Weight was attributed to:

- The employment opportunities associated with the care home.
- The contribution the care home would make towards addressing the housing crisis.
- The tilted balance was engaged, and the harm did not significantly and demonstrably outweigh the benefits.

1.24 These matters are particularly relevant to the current application at Premier Business Park, which would also provide / satisfy each of the above points.

Application ref. 21/06761/F – North Side of Gas Lane

1.25 Although this site is not located in a PIWA, it is located in the Bristol Central Area and covered by Policy BCAP7 (Loss of Employment Space), which affords protection to employment sites.

1.26 This PBSA-led development would also result in the net loss of 1,355 sqm of industrial floorspace (Class B2), however the officer's report states that the reduction is balanced against other policy aims of the area and that the proposed Class E commercial space 'could be used for a range of uses including retail or workspaces'.

Application ref. 21/06878/F – York Road

1.27 The scheme comprises 221 residential units and 651 sqm of commercial floorspace in the PIWA. The approved development includes no replacement industrial uses on site and no marketing was undertaken for ongoing industrial uses. The report states that these considerations are weighed against policy aspirations and the results of the housing delivery test.

1.28 The officer's report notes that the site is potentially earmarked for release from the PIWA in the Local Plan review, however this can only be afforded very limited weight at this time.

## Conclusions

- Premier Business Park is designated in the Old Market Quarter Neighbourhood Development Plan as a Long Term Development Site in the PIWA, where residential uses will be considered.
- The current site is low density and supports a relatively small number of jobs (20-25 FTE).
- The proposed development will provide focussed, high density employment space delivering circa 75 - 85 FTE jobs onsite.
- The proposed ground floor uses have been selected based on the needs of local residents as per the extensive community engagement exercise. The supermarket and community space are specifically provided with this in mind.
- Although the proposed development will result in a net loss of employment floorspace, it will provide a net gain in FTE jobs of 50-60 onsite, the majority of which will be industrial in nature. This translates to an uplift in GVA of £2.4m compared to the existing site.
- Case Studies are provided where BCC has previously allowed the loss of PIWA floorspace or other protected employment floorspace, with particular weight given to the net gain in FTE jobs offered by the alternative use.
- The proposed development is considered to accord with policy B5 and the aims of the Old Market Quarter Neighbourhood Development Plan. The site is on the edge of the PIWA and the proposed

development will provide a significant increase in jobs. The design has been carefully considered to ensure that suitable amenity for future residents will be provided.

- The proposal will deliver significant economic, social and environmental benefits as discussed in the application pack and summarised above. Any perceived harm from the relatively small loss of employment floorspace is considered to be more-than compensated for by the uplift in jobs and these other benefits.
- With the tilted balance engaged, it is considered that the proposed provision of industrial uses and other employment generating uses at ground floor, which result in a much higher job creation and activation of the surround streets, would significantly and demonstrably outweigh any perceived harm.