LP/Ev/3g

knell Council

# Bracknell Forest Local Plan (Pre-Submission/Regulation 19 Publication)

# Economic Background Paper

# Version for Executive/ Council March 2021

This background paper supports the Pre-Submission Bracknell Forest Local Plan and provides background information on economic needs and supply of floorspace in the Borough over the plan period.

This document is not on deposit for consultation and is background evidence.

Any queries regarding the document should be sent to:

Email: <u>development.plan@bracknell-forest.gov.uk</u>

Website: <u>https://www.bracknell-forest.gov.uk/planning-and-building-</u> control/planning/planning-policy/development-plan/draft-bracknell-forest-localplan/background

# Contents

1.	Introduction	1
2.	Background	2
Ν	ational policy	2
L	ocal policy	3
С	ther Plans and strategies	4
3.	Economic needs	8
L	ocal employment needs	8
Ν	eighbouring areas employment needs	11
L	ocal retail and commercial needs	12
Ν	eighbouring areas retail and commercial needs	14
4.	Economic supply	15
E	xisting employment areas	15
Ir	npact of Use Class Order changes on employment areas	19
E	xisting retail areas	19
Е	mployment Commitments	20
5.	Strategy to meet employment and economic needs	21
S	trategic Housing and Economic Land Availability Assessment	21
С	verall employment and economic strategy	22
E	mployment	22
E	conomic	30
6.	Duty to Cooperate	37
7.	Regulation 18 consultation responses	38
8.	Development management policies	39
9.	Conclusions	41
10.	Appendix 1 Changes to the Employment Areas	43

# 1. Introduction

- 1.1 This paper sets out the Council's approach to economic policies in the Bracknell Forest Local Plan (BFLP). It sets out the relevant national policies and guidance relating to BFLP economic policies, summarises the evidence that has been gathered to respond to this, and explains how this has informed the development of policies.
- 1.2 The paper has been written to aid the examination of the Local Plan for Bracknell Forest and the issues raised in relation to employment and economic matters. It is intended to demonstrate that the Council has a taken a comprehensive, robust and sound approach to this issue.
- 1.3 This Paper forms part of a suite of documents, produced to support the examination of the Local Plan.
- 1.4 The paper is split into the following themes:
  - Background
  - Economic needs
  - Economic supply
  - How the remaining requirement is to be met
  - Duty to Cooperate
  - Development management policies
- 1.5 There are several key pieces of evidence relating to economic uses:
  - Functional Economic Market Area (FEMA) (2016)
  - Central Berkshire Economic Development Needs Assessment (EDNA) (2016)
  - Employment Land Needs Study (2020)
  - Western Berkshire Retail and Commercial Leisure Assessment (2017)
  - Bracknell Town Centre Retail Needs Technical Review (Sept 2020)
- 1.6 For the purpose of the BFLP, *employment* development is defined as offices, general industrial, and storage or warehousing and distribution together with any sui generis uses that share a significant number of characteristics with those uses. However, *economic* development covers a broader range of uses including employment development and 'Main Town Centre' uses. For clarity, 'economic development' is therefore taken as including office, industrial and storage (warehousing & distribution), retail, leisure, entertainment and more intensive sport and recreation uses, arts, culture and tourism development.
- 1.7 The BFLP vision states that by 2037 the Borough will have positively and sustainably embraced the need to build new homes and create new jobs and improve and develop new infrastructure, services and facilities. Existing key employment areas will have been protected and supported to adapt to changes in how people work and new business models. The Borough's economy will be dynamic and thriving with specialised sectors contributing to the wider area. The Borough will benefit from a well-educated, skilled and flexible labour force with high levels of employment.

# 2. Background

#### National policy

- 2.1 The National Planning Policy Framework (NPPF) states that a Local Planning Authority (LPA) should ensure that its Local Plan provides a positive vision for the future of each area. It states that this should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area (para. 31).
- 2.2 With regard to employment, planning policies should help to create the conditions in which businesses can invest, expand and adapt, and should support economic growth and productivity (para. 80). The NPPF is clear that LPAs should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. The strategy should be flexible enough to accommodate needs not anticipated in the plan, including being flexible enough to enable a rapid response to changes in economic circumstances (para. 81).
- 2.3 The NPPF is also clear that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation (para. 85).
- 2.4 The NPPF makes it clear that 'main town centre uses' (defined in the Annex 2 Glossary), should be located in town centres. Along with the Planning Practice Guidance (PPG), it sets out that the sequential test should be used as a tool to guide main town centre uses towards town centre locations first. This approach is seen as a means of supporting the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking. The House of Commons Housing, Communities and Local Government Committee has published a document titled 'High streets and town centres in 2030' (February 2019). This states that town centres should be seen as activity-based community gathering places where retail is a smaller part of a wider range of uses and activities and where green space, leisure, arts and culture and health and social care services combine with housing to create a space based on social and community interactions.
- 2.5 The NPPF states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development (para. 23).
- 2.6 LPAs should use their evidence base to assess the needs for land or floorspace for economic development. To achieve this, they should work together with Neighbouring Authorities and Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market.
- 2.7 The Planning Practice Guidance (PPG) advice on 'Housing and Economic Land Availability Assessments' provides further detail about how economic need should be calculated. It advises that national economic trends may not translate to areas with a distinct employment base. Whilst it is clear that there is no one methodological approach or use of a particular dataset that will provide a definitive assessment of

development needs, it does advise that the evidence base for business needs should include an assessment of the following factors<sup>1</sup>:

- Best fit functional economic market area;
- the existing stock of land for employment uses within the area;
- the recent pattern of employment land supply and loss;
- evidence of market demand sourced from local data and market intelligence;
- wider market signals relating to economic growth, diversification and innovation; and
- any evidence of market failure such as physical or ownership constraints that prevent the employment site being used effectively.
- 2.8 Additionally, the PPG is clear that specific requirements of specialist sectors, including clustering of certain industries, can play an important role in supporting collaboration, innovation, productivity and sustainability, as well as enhancing the economic prospects of the areas in which they locate. It goes on to clarify that these needs are often more qualitative in nature and will have to be informed by engagement with businesses and occupiers within relevant sectors.<sup>2</sup>
- 2.9 The PPG is clear that for town centres and retail, strategies should be based on evidence of the current state of town centres and the opportunities that exist to accommodate a range of suitable development and support their vitality and viability.<sup>3</sup>
- 2.10 In September 2020, the Government substantially amended the Use Class Order (UCO), creating several new use classes, moving some previous retail uses to sui generis use and removing some use classes completely. Some uses are no longer able to change use without permission (e.g. pubs, takeaways). However, many former retail uses and business (formerly A1, A2, A3 and B1) now fall into 'Class E' whereby there is greater flexibility for changing between uses to meet commercial needs without needing planning permission. Policies in the BFLP have been amended to reflect these changes, but the evidence base underpinning the Local Plan refers to the 1987 UCO as amended, including B-classes for employment and A-class for retail. While the UCO has been altered the PPG has not been updated to reflect this change in flexibility to meet commercial needs.
- 2.11 The results and impacts of the Government consultation<sup>4</sup> undertaken in December 2020
   January 2021 on changes to permitted development rights is not yet known.

#### Local policy

2.12 One of the six main themes in the Council's Plan<sup>5</sup> is economic resilience, including the aim that Bracknell Forest should continue to thrive, even with the challenges ahead for all sectors of the economy and to help retain businesses and attract new companies to the area.

https://www.gov.uk/government/consultations/supporting-housing-delivery-and-public-service-

Bracknell Forest Council Pre-Submission Economic Background Paper (Version for Executive/Council March 2021)

<sup>&</sup>lt;sup>1</sup> Reference ID: 2a-026-20190220

<sup>&</sup>lt;sup>2</sup> Reference ID: 2a-032-20190722

<sup>&</sup>lt;sup>3</sup> Reference ID: 2b-004-20190722

<sup>&</sup>lt;sup>4</sup> Supporting housing delivery and public service infrastructure consultation:

infrastructure/supporting-housing-delivery-and-public-service-infrastructure <sup>5</sup> Bracknell Forest Council Plan 2019 - 2023

- 2.13 The BFLP will replace the Core Strategy (2008), 'Saved' Policies in the Bracknell Forest Borough Local Plan (BFBLP, 2002) and some policies in the Site Allocations Local Plan (SALP, 2013). Therefore, this background paper does not summarise these Plans.
- 2.14 The SALP made no major new allocations of employment land due to the existing stock of floorspace and commitments for future development. A significant proportion of committed floorspace related to the Bracknell Town Centre regeneration scheme, although the majority of this involved the replacement of existing older floorspace. The SALP notes that there is also provision in the major locations for growth identified in the Core Strategy, for some limited employment floorspace as part of mixed-use schemes (namely at Amen Corner (South) and Warfield). The SALP includes two retail policies; one relating to Bracknell Town Centre and one allocating the Peel Centre as an edge-of-centre retail warehouse park. The SALP also deleted the designation covering the former 'Crowthorne Business Estate' and added a Policy designation to the Sandhurst Royal Military Academy (Policy SA10)
- 2.15 The Binfield Neighbourhood Plan was made in 2016 following a successful community referendum. It has a suite of policies covering transport and connectivity, community facilities, the environment, communications and built form. Policies CF1 and CF2 set out support for new healthcare facilities and a community shop at Blue Mountain respectively.

# Other Plans and strategies

# Industrial Strategy: the Grand Challenges

- 2.16 Four 'Grand Challenges' are identified to put the UK at the forefront of industries of the future. Two of these challenges involve maximising the advantages for UK industry from the global shift to clean growth (which includes high efficiency agriculture) and putting the UK at the forefront of the artificial intelligence (AI) and data revolution (which includes working with industry to develop innovative uses of AI and advanced analytic technologies).
- 2.17 Each 'Grand Challenge' has associated missions. As part of the Clean Growth challenge<sup>6</sup>, there is a mission to "Establish the world's first net-zero carbon industrial cluster by 2040 and at least one low-carbon cluster by 2030". The Government sets out that to achieve the mission includes "positioning UK clusters as top areas for global inward investment and driving demand for low carbon products and technologies by harnessing the power of markets, the public sector, universities and local communities".

# BEIS Small and Medium Enterprises (SME) Action Plan (March 2019)

2.18 The government wants to ensure it gets full value from small and medium-sized enterprises (SMEs) and is working to help them gain a greater share of central government business. The SME Action Plan<sup>7</sup> covers BEIS Group<sup>8</sup>, and sets out a number of priority and further actions to help increase the BEIS Group procurement

<sup>&</sup>lt;sup>6</sup> The Grand Challenge missions

<sup>&</sup>lt;sup>7</sup> BEIS Small and Medium Enterprises Action Plan

<sup>&</sup>lt;sup>8</sup> BEIS is the government department which brings together responsibilities for business, industrial strategy, science, innovation, energy, and climate change. The department is responsible for ensuring the country has secure energy supplies that are reliable, affordable and clean and ensuring the UK remains at the leading edge of science, research and innovation.

spend to more SMEs. It has a target for 33% of procurement spend to be for SMEs by 2022.

# Industrial Strategy: Artificial Intelligence Sector Deal

2.19 Artificial Intelligence (AI) presents a huge global opportunity, and this is why the Industrial Strategy White Paper identified AI and data as one of four Grand Challenges – in which the UK can lead the world for years to come. A key ambition of the industrial strategy is for the UK to be the world's most innovative economy. The AI Sector Deal<sup>9</sup> aims to attract and retain both domestic and global AI talent; deliver major upgrades to our digital and data infrastructure; ensure that the UK is the best place to start and grow an AI business; and contribute to communities' prosperity by spreading the benefits of AI across the country. To grow the UK's AI and data-drive economy, a broader opportunity/ challenge includes making the UK a global centre for AI and data-driven innovation by investing in R&D, skills and regulatory innovation. A further Government action to support AI is to work closely with key clusters to provide the support needed for AI businesses to thrive, and to invest in AI-related research and development to boost productivity. This will include funding for AI solutions across key sectors; Services, life sciences, agriculture and the public sector.

Thames Valley Berkshire (TVB): Strategic Economic Plan (SEP) (2015/16 – 2020/21)<sup>10</sup>

- 2.20 Thames Valley Berkshire (TVB) is an economic powerhouse of enormous importance to the UK; providing 2% of national GVA. The SEP aims to see national growth locally, through the overarching priority of securing better access to talented people and bright ideas, and by using both more effectively. All six unitary authority areas within TVB featured in the top 15 nationally of tech-based employment (mainly linked to the IT sector).
- 2.21 It is considered essential that Reading, Slough, Wokingham, Newbury, Thatcham, Bracknell, Maidenhead and Windsor all function well as towns. They need to have clear and distinctive roles that allow them to complement, rather than compete with, each other. This can be achieved through collaboration. In all cases, they need also to be vibrant centres.

# Draft Berkshire Local Industrial Strategy (BLIS)

2.22 The Berkshire Local Enterprise Partnership (LEP) published its Draft Berkshire Local Industrial Strategy<sup>11</sup> (BLIS) in March 2019. This highlights the importance of the Life Sciences and IT Sectors to Berkshire. The BLIS identifies 'priorities' that are to be developed in order to help accelerate growth in Berkshire as there is concern that levels of investment have decreased due to a cautious approach being taken by the business community due to the level of uncertainty. One priority identified is to look at ways of enhancing productivity within Berkshire's enterprises. A further priority is to foster relationships and interdependencies linked to economic life which are considered to be weaker than in some areas outside Berkshire. The potential of certain organisations and sites to act as institutional anchors is to be investigated. Specific reference is made to

<sup>&</sup>lt;sup>9</sup> Artificial Intelligence Sector Deal (Industrial Strategy)

<sup>&</sup>lt;sup>10</sup> TVB Strategic Economic Plan (2015/16 – 2020/21)

<sup>&</sup>lt;sup>11</sup> Berkshire Local Industrial Strategy – consultation document (March 2019)

the global research and development centre for agro-chemical research operated by Syngenta at Jealott's Hill.

2.23 The Business in Berkshire Report from 2019<sup>12</sup> identifies Syngenta as a centre of excellence and a company with a significant operation in Berkshire, and a firm that undertakes significant research and development activity within Berkshire. The report provides links to Government data showing Syngenta has been involved in several 'collaborative research and development (R&D), feasibility, smart and innovation voucher grants, and Knowledge Transfer Partnerships' between 2004 and 1 December 2020<sup>13</sup>

#### Bracknell Forest Council – Council Plan 2019-23

2.24 The Council Plan is based on various themes, one being 'Economic Resilience'. This includes a commitment from the Council to work hard at helping the Borough to continue to thrive and recognises that there will be many challenges ahead for all sectors of the economy. Key objectives are identified. Whilst one of these is adopting a Local Plan, others involve securing the delivery of the next phase in the regeneration of Bracknell town centre, retaining existing businesses and helping to attract new companies to the Borough, together with, actively engaging with employers and supporting local businesses to drive local growth.

# Bracknell Forest Council - Bracknell Town Centre Vision 2032

- 2.25 The Bracknell Town Centre 2032 Vision document<sup>14</sup> is intended to help stimulate future discussion and broaden public awareness in advance of any formal consideration of place shaping policy, strategy and development proposals in the Town Centre over the next 15 years. The Vision takes account of the town's historical context, recent and anticipated investment and the potential demand for space and land use over the next 5 to 15 years. The Vision identifies the impact of investment to date which has brought about a positive reinvention and change in public perception. In essence the Vision seeks to unlock growth building on the success and ambition demonstrated by the Council and its partners.
- 2.26 The Vision sets out short, medium- and longer-term aspirations. It aims to identify opportunities and possible ways in which the next stages of redevelopment could take place, and to inform strategies such as the Local Plan and future development proposals for the various sites. The document does not have any formal planning status.

#### Other data<sup>15</sup>

2.27 In 2020, 87.3% of residents were economically active (aged 16-64) with the majority of residents employed in the private sector (82.5%). The majority were employees (73.2%) rather than self-employed (10.7%). This is slightly different to the regional and national picture which sees slightly higher levels of self-employment (11.8% and 11% respectively).

<sup>&</sup>lt;sup>12</sup> Business in Berkshire 2019

<sup>&</sup>lt;sup>13</sup> Innovate UK funded projects 2004 – December 2020

<sup>&</sup>lt;sup>14</sup> Bracknell Town Centre Vision 2032

<sup>&</sup>lt;sup>15</sup> Berkshire Observatory

Bracknell Forest Council Pre-Submission Economic Background Paper (Version for Executive/Council March 2021)

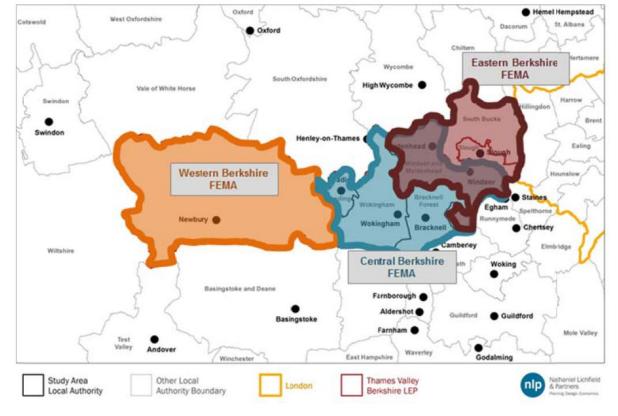
- 2.28 Business count data shows that Bracknell Forest had 5,200 active businesses in 2018. e There were 595 business births and 575 deaths. The main businesses by industry in Bracknell Forest are construction (16.1%), Information and communications (16.1%), Professional, Scientific and Technical (20.4%) and Business administration and support services (11.1%).
- 2.29 In 2017, the Information and communication sector provided the largest GVA to the Borough at £1,270m, with wholesale and retail coming in second at £1,046m GVA. Overall, the GVA from services in Bracknell Forest was £4,738m with production accounting for £167m. This equated to a GVA of 42,076 per head; considerably above regional (28,961) and national (27,676).

# 3. Economic needs

#### Local employment needs

# Functional Economic Market Area (FEMA) (2016)<sup>16</sup>

- 3.1 In 2016, along with the other Berkshire local authorities, work was undertaken on understanding the various economic relationships, linkages and flows which characterise the sub-regional economy in the Thames Valley. Based upon an assessment of the various functional economic markets that operate in Berkshire, it concluded that the spatial extent of functional economic markets does not extend far beyond the Thames Valley Berkshire Local Economic Partnership (TVBLEP). Three core FEMAs were identified which represent a 'best fit' with Local Authority boundaries.
- 3.2 Bracknell Forest was found to fit best within the 'Central Berkshire FEMA' along with Reading, Wokingham and Windsor and Maidenhead (see figure 1). This aligns with the ONS defined Reading Travel to Work Area (TTWA) and also the Upper M4 commercial property market area which is focused around the key M4 markets of Reading, Maidenhead, Bracknell and Wokingham, with strong economic relationships between these towns in terms of value, accessibility and labour force.



#### Figure 1: Findings of FEMA Study

Source: NLP analysis, drawing upon a range of sources (Figure taken from the Central Berkshire FEMA Study)

<sup>16</sup> Berkshire Functional Economic Market Assessment

# Economic Development Needs Assessment (EDNA) (2016)<sup>17</sup>

- 3.3 The Central Berkshire EDNA considered the objectively assessed economic development needs of Bracknell Forest, Reading, Windsor and Maidenhead and Wokingham within the Central Berkshire Core FEMA over the period 2013-2036. The study considered the future quantitative land and floorspace requirements alongside related qualitative factors for individual sectors and employment uses. In accommodating growth needs, the EDNA notes the competing pressures on land within authorities and the footloose nature of some needs (strategic logistics and distribution) that means they can be accommodated across individual boundaries.
- 3.4 The study looked at three scenarios: labour demand, past trends in completions of employment space and local labour supply. For Bracknell Forest, this resulted in a wide range of net employment floorspace requirements (gross external area m<sup>2</sup>) and land requirements (in hectares) (see table 1).

Uses	1. Baseline Labour Demand	2. Past Completion Rates	3. Labour Supply
Offices (B1a/B1b)	106,215	-215,165	85,410
	(36.4ha)	(-25.5ha)	(32.5ha)
Industrial	324,395	6,785	263,110
(B1c/B2/B8)	(85.7ha)	(6.3ha)	(70.3ha)
Total B Class	430,610	-208,380	348,520
Floorspace (sqm)	(122.1ha)	(-19.2ha)	(102.8ha)

Table 1: Net employment floorspace and land requirements (sqm and ha) for Bracknell Forest in the EDNA

3.5 The study recommended as a minimum using scenario 3 - labour supply as the basis for Local Plan spatial planning.

Employment Land Need Study (ELNS) (2020)<sup>18</sup>

- 3.6 Following the publication of the EDNA in 2016, a joint ELNS was undertaken in 2020 along with Wokingham BC and West Berkshire. This work was undertaken because there had been significant changes since the EDNA base date of 2016, not least the population and labour supply assumptions due to the new Standard Method that must be used to calculate the Local Housing Need (LHN). Additionally, there were concerns about the method and reality of the outputs in the EDNA. This was because the recommendations failed a 'sense check' and were promoting a scale and mix of employment need in excess of what the Councils across Berkshire consider could be supported by local market trends. The ELNS changed the approach by testing a number of the key assumptions with local evidence and updated the need where necessary.
- 3.7 A key difference was the approach applied to identifying how many jobs were in the various employment land uses in the Borough. For this the ELNS used the 'fine grain' Inter-Departmental Business Register (IDBR) data. The ELNS found that the EDNA had erred in key assumptions, particularly about how local firms use their space. Firms

<sup>&</sup>lt;sup>17</sup> Central Berkshire Economic Development Needs Assessment

<sup>&</sup>lt;sup>18</sup> BFC Employment Land Needs Study (2020)

thought to use their space for warehousing/industrial activity were in fact operating offices, and this resulted in an over-estimate of the number of industrial jobs (especially warehousing) and an over-estimate of the floorspace and land needed.

- 3.8 Additional testing was also undertaken on the EDNA's approach to the inclusion of a 'margin' which builds in an allowance for future losses and safety margin. The ELNS review of the existing stock indicated it was hard to justify that losses in the past would be repeated in the future and therefore such a margin. The ELNS took a different approach, calculating gross demand from known commitments in the planning pipeline. This provides a good indication of gains and losses in floorspace over the short term (Plan years 1-5) and ties in with the plan review cycle.
  - 3.9 The projections for future employment land and floorspace requirements in the ELNS are based on job forecasts, and specifically a bespoke variant on this that is based on the standard method and the data sources needed to calculate the LHNd. Thus the forecast of future jobs and employment land is aligned with the population generated by the LHN and housing need.

	Office (B1a/b) m² NIA	ha	Industrial (B1c, B2 & B8) m² GIA	ha
a. Net demand	57,192		88,921	
b. Gross demand	93,830		99,742	
c. Gross supply	76,086		54,057	
d. Requirement balance (rounded) (b-c)	18,000		46,000	
e. Annualised requirement (d / 16 years)	1,125		2,875	
f. Plan period requirement (rounded) (d+e)	19,125	3	48,875	12
g. Combined requirement (rounded)	68,000			

Table 2: Summary demand supply balance for Bracknell Forest 2020-2037 (derived from the ELNS)

- 3.10 The net demand (row a) is the translation of jobs into floorspace, as set out in the ELNS<sup>19</sup>.
- 3.11 The gross demand (row b) is calculated by adding hard commitments (losses/gains with planning permission), an allowance to replace future losses resulting from PDR approvals, an allowance for adopted plan allocation losses to non-office/industrial uses and an allowance to increase vacant stock to the frictional vacancy rate (7.5%)<sup>20</sup>.

<sup>&</sup>lt;sup>19</sup> See Tables 6.2, 6.3 and 6.4 of the ELNS (April 2020)

<sup>&</sup>lt;sup>20</sup> See Tables 6.5 and 6.6 of the ENLS (April 2020)

- 3.12 The gross supply (row c) is calculated by taking into account the supply of floorspace available for future employment (including planning permissions yet to be implemented). Gross demand minus gross supply generates the balance (row d). For both offices and industrial the available planned supply is less than the gross demand, generating employment land requirements in the plan period.
- 3.13 The ELNS calculated need to 2036, but the plan period runs to 2037, so an annualised requirement (dividing the requirement in 'row d' by 16 years) has been produced and then added to the total. Based on the results of this study, there is a need for a further 19,000m<sup>2</sup> of office floorspace (~3ha) and 49,000m<sup>2</sup> of general industrial and storage/warehousing floorspace (~12ha) during the plan period.
- 3.14 To ensure sufficient flexibility surrounding provision of employment land for the plan period, the Local Plan combines the need for office and industrial floorspace to create a total floorspace requirement. Since a rounded requirement has been used and an extra year added, the Local Plan floorspace requirement is slightly higher than set out in the ELNS. This is in accordance with NPPF paragraph 35 which requires Local Plans to be positively prepared.

#### Neighbouring areas employment needs

#### Employment needs in Central Berkshire

- 3.15 In responding to consultations on other Berkshire Local Plans and through ongoing duty to cooperate discussions with other LPAs in the Central Berkshire FEMA, and joint preparation of some employment studies, BFC has not been asked to meet the employment needs of any other LPA.
- 3.16 In its Local Plan, Reading Borough Council (RBC) states that "Reading is also therefore likely to meet a greater proportion of Central Berkshire's need for offices than anticipated in the EDNA, and the overprovision of up to 60,000 sq m can be seen as a contribution to the wider needs of the functional economic market area which may have implications for other Local Plans within the Central Berkshire area." RBC is proposing to meet its industrial floorspace needs.
- 3.17 Joint work was undertaken on the ELNS as part of the employment evidence base along with Wokingham Borough Council (WBC). However, WBC is not as far advanced in its plan preparation process as BFC. Consequently, it is not yet fully understood as to whether or not WBC can meet its employment needs.
- 3.18 At the time of writing, the Royal Borough of Windsor and Maidenhead's Local Plan is at examination. The submission Local Plan employment policies set out how the availability of employment land and premises will be managed flexibly, to ensure the efficient future use of sites and encourage and enable the provision of a sufficient supply to meet identified needs. The economic development policy seeks to make provision for 11,200 jobs across a range of B-class floorspace comprising at least 130,700m<sup>2</sup>, which is based on the forecast Labour Supply Scenario. The jobs are across all sectors and the floorspace just for the B-class uses. The strategic policies are complemented by a suite of development management policies linked to different aspects of the local economy.

#### Employment needs in other areas

- 3.19 Hart District Council is located within the Enterprise M3 LEP, along with Rushmoor and Surrey Heath. The Hart Local Plan was adopted in 2019. The Economic Development Strategy for the district has three principal priorities: to have a dynamic business base; competitive advantage; and desirable business location. The evidence base underpinning employment policy included an Employment Land Review (2016) which showed there to be strong economic links between Hart, Surrey Heath and Rushmoor (a FEMA). The ELR found an over-supply of lower grade stock, strong demand from rural enterprises/SMEs and concluded employment floorspace and commitments were likely to be sufficient to meet employment needs and job growth up to 2032. The Local Plan Policy SS3 Area of Search for new settlement provides an opportunity to allocate land for employment use.
- 3.20 Surrey Heath Borough Council is not as far advanced in its plan preparation as neighbouring Hart District Council. In September 2020, it published a Technical Update Paper to the ELR. This found the area has a need for between -4.3ha and 15.9ha depending on the model used. The area is likely to see strong growth in office and Research and Development with a long-term decline in manufacturing. Recent completions suggest a need for warehousing. The Technical Update advises that a framework is needed that enables intensification, upgrading and refurbishment of employment sites for more efficient use of land.

#### Local retail and commercial needs

# Western Berkshire Retail and Commercial Leisure Assessment (2016)<sup>21</sup>

- 3.21 The joint study undertaken on behalf of BFC, WBC, RBC and West Berkshire Council in 2016 sets out the need for comparison and convenience floorspace for the period 2016 to 2036. It concluded that town centre strategies which support the continued evolution of the high street are now vital. It recommended that this should involve providing a high-quality shopping 'experience', maximising the benefits of tourist trade, and improving the mix of retail and non-retail outlets to increase length of stay and spend.
- 3.22 The study states that as the nature of retail and high-street shopping continues to change over time, the commercial leisure sector is becoming an increasingly important contributor to the vitality and viability of town centres. The ongoing regeneration of Bracknell Town Centre involves a significant commercial leisure element.
- 3.23 The study identified the quantitative 'need' for each LPA over the course of the period to 2036, based on the findings of the household telephone survey and planned future development such as the opening of Lexicon Bracknell. It identified a requirement for Bracknell Forest of 27,900m<sup>2</sup> net comparison floorspace and 5,000m<sup>2</sup> net convenience floorspace. It concluded there were no additional requirements for commercial and leisure floorspace.
- 3.24 Although the study had regard to planned future development, the Lexicon was not open when the assessment was completed. At the time it was assumed that Bracknell's attractiveness as a comparison goods shopping destination would increase as a

<sup>&</sup>lt;sup>21</sup> Western Berkshire Retail and Commercial Leisure Assessment (Main Report)

consequence of the opening of the Lexicon and that Bracknell's 'market share' would increase, generating a greater 'need' for new comparison goods floorspace in Bracknell.

Bracknell Town Centre Retail Needs Technical Review (Sept 2020)<sup>22</sup>

- 3.25 The opening of the Lexicon in Bracknell Town Centre has been recognised as a successful regeneration project. The Lexicon opened in September 2017. Bracknell Town Centre rose in the retail rankings (Trevor Wood Associates) to 29th in 2019 (from 255th before the redevelopment). Due to apparent changes, it was decided to undertake a technical review of the assumptions and resulting requirements set out in the 2016 Western Berkshire Retail and Commercial Leisure Assessment, to determine whether they were still appropriate.
- 3.26 The Technical Review of the original study concluded that there have been significant changes in circumstance since the earlier report. Due to Covid-19 it was not possible to carry out a new household survey, but visitor postcodes indicate that Bracknell town centre now draws shoppers from a wider area. A much lower proportion of the Lexicon has been delivered as comparison goods floorspace than expected, so the uplift in comparison goods market share predicted may have overstated the need for comparison floorspace set out in the original report.
- 3.27 Special Forms of Trading (i.e. online) have been revised upwards significantly, (irrespective of the impact of Covid-19) and retailer efficiency growth assumptions (i.e. assuming that retailers use their space more efficiently every year) have increased. The Review included the latest projection of online spending from Experian which indicates that the market share achieved by online retailers is growing at a much faster rate than predicted within the 2016 Assessment. As a consequence, the Review estimated that the total amount of comparison goods expenditure available to Bracknell and other centres in the study area could be more than 10% lower by 2031 than predicted in 2016. The latest population projections also indicate that a slower rate of population growth may occur over the next 20 years, potentially reducing the pool of future expenditure further.
- The Review undertook a series of sensitivity tests to estimate the impact of revised 3.28 assumptions on the need for additional comparison and convenience goods floorspace within Bracknell Forest. The Review considered it prudent to plan for the needs arising from the updated 'increased retention scenario', which indicates a need for up to 9,100m<sup>2</sup> of comparison floorspace, and the 'updated baseline scenario' which indicates a need of 1,900m<sup>2</sup> convenience floorspace by 2031. The sensitivity scenarios in the Review indicate that need may be lower than this and there is little evidence to suggest that need is likely to be higher. The Review also identified that there was 11,688m<sup>2</sup> of vacant floorspace in Bracknell Town Centre (21%). It is recognised that Bracknell has experienced a step change in its role as a centre (its position in the retail rankings has increased significantly enhancing its position within the local retail hierarchy). However, the Study concludes that there is no residual need for new retail floorspace when taking into account vacant floorspace although a proportion of this will be consumed by the delivery of 'The Deck') and proposed allocations for economic /mixed-use in the emerging BFLP. The Review also highlights the importance of keeping the situation under review, ensuring that any market signals of rising demand for retail floorspace can be responded to in a timely manner. Although the impact of Covid-19 on the High Street

<sup>&</sup>lt;sup>22</sup> Town Centre Retail Needs Technical Review

is as yet unknown, it is likely that this will have exacerbated the position in terms of a decrease in footfall, and closure of stores<sup>23</sup>.

3.29 The net loss of floorspace at the Peel Centre and The Point was not assessed through the Review. It is considered difficult to predict the impact of losing this floorspace at this stage, given the number of other variables which have changed since the 2016 household survey. It is likely that a sizeable proportion of the spend which was being captured by the Peel Centre in 2016 will already have diverted to Bracknell Town Centre.

#### Neighbouring areas retail and commercial needs

- 3.30 The joint Western Berkshire Retail and Commercial Leisure Assessment concluded that RBC had a need for up to 57,400m<sup>2</sup> comparison and would be likely to see a net loss of convenience floorspace up to 2036. There was a need for an additional cinema and entertainment venues.
- 3.31 The Assessment concluded that Wokingham Borough had a need for 5,000m<sup>2</sup> of comparison and 12,000m<sup>2</sup> of convenience floorspace, with no additional requirement for leisure floorspace. For West Berkshire it found a need for 25,600m<sup>2</sup> comparison and a net loss of convenience floorspace up to 2036. It stated that there was potential for a small boutique cinema to meet commercial leisure needs.
- 3.32 The Royal Borough of Windsor and Maidenhead's (RMWM) Retail and Town Centre Study Update (2019) identified a need for 2,900m<sup>2</sup> of convenience floorspace and 3,000m<sup>2</sup> of comparison floorspace by 2036. The RBWM Borough Local Plan (submission version, 2019) provides for a slightly lower need (2,350m<sup>2</sup> convenience and 2,700m<sup>2</sup> comparison floorspace) than that identified in the study. This was due to the assumption that none of the new floorspace would be provided at the relatively low sales densities for 'non-central' retail warehouses.
- 3.33 Slough Borough Council is at an early stage in producing a new Local Plan and has not yet identified its retail needs.
- 3.34 Hart District Council's Retail, Leisure and Town Centres Study (2015) identified a need for 7,306 9,074m<sup>2</sup> of convenience floorspace and 4,449 5,868m<sup>2</sup> gross of comparison floorspace by 2032. The Hart Local Plan (2020) included provision for approximately 5,900m<sup>2</sup> (net) of additional convenience retail floorspace and 3,960m<sup>2</sup> (net) of additional comparison floorspace in the District up to 2032.
- 3.35 Surrey Heath Borough Council is at an early stage in producing a new local plan and has not yet identified its retail needs in an up to date study.

<sup>&</sup>lt;sup>23</sup> The future of towns and cities post Covid-19

# 4. Economic supply

# Existing employment areas

# Background

- 4.1 Designated Employment Areas fulfil an important role within Bracknell Forest, containing established concentrations of business, industry, distribution and storage development (BIDS) with supporting infrastructure. There are several benefits of defining employment areas including availability of infrastructure and support facilities, focus on business, economies of scale, inter-relatedness as well as providing protection and identifying where intensification or expansion would best meet employment land needs.
- 4.2 Bracknell Forest currently has five designated Employment Areas identified through its adopted Development Plan:
  - Western Employment Area
  - Eastern Employment Area
  - Southern Employment Area
  - Vulcan Way
  - Broadmoor
- 4.3 The Employment Areas in Bracknell Town (Western, Eastern and Southern) are home to many multi-national companies and thousands of smaller ones that contribute to the buoyant local economy. Indeed, several of the biggest office leases in the past 12 months in Berkshire were in Bracknell Forest, with recent data suggesting that business parks remain popular with investors. Amen Corner in the Western Employment Area was sold to a joint venture in late 2019, with a proposal for speculative redevelopment of the site for logistics and data centre use<sup>24</sup>.
- 4.4 As set out in Chapter 3 of this background paper, the ELNS found the need for 68,000m<sup>2</sup> floorspace up to 2037. It is therefore important to consider whether the extent and location of existing Employment Areas could help facilitate sustainable economic growth, and whether there are any additional areas that can be allocated for employment use. Safeguarding their employment generating role can help to achieve sustainable communities.

# Article 4 direction

- 4.5 As a result of Prior Approval Consents (PACs) and other applications, the integrity of some employment areas has been damaged, or their character altered. The Council was aware of concerns raised by a number of local employers in Bracknell Town that the change of use of neighbouring office buildings within established Employment Areas to residential uses undermines the quality of the environment as an attractive business location.
- 4.6 In response to rising concerns about losses of office floorspace, the Western, Southern and Eastern Employment Areas have been covered by an Article 4(1) direction since 27 February 2018.<sup>25</sup> This removed the permitted development right to change offices to

<sup>&</sup>lt;sup>24</sup> Office Market Report Berkshire and North Hampshire (CoStar, June 2020)

<sup>&</sup>lt;sup>25</sup> Article 4 Direction – Defined Bracknell Business Areas

residential use without the need for planning permission. As a result, prior approval consents (PAC) are not acceptable in these areas. This was undertaken for several reasons, including to preserve and control the character of the Borough's key business areas as attractive locations for occupiers of office space, and help reduce the loss of employment floorspace.

# Proposed changes to employment areas

- 4.7 Through the BFLP, the Council is proposing:
  - to safeguard four of its designated Employment Areas
  - make minor changes to the boundary and extent of the Western Employment Area
  - designate Wellington Business Park as an Employment Area
  - remove the designation from the Broadmoor Employment Area.
- 4.8 Prior to the Article 4 Direction coming into effect, the use of some buildings had already changed and in certain cases the new land use no longer fits a suitable purpose within a designated Employment Area. Where such changes have happened on the edge of designated Employment Areas, it is considered pragmatic to amend the boundary where it can create a new defensible boundary through the local plan process.
- 4.9 A comprehensive review of existing employment area boundaries was undertaken in the 'Employment Areas Assessment' (Document ref: LP/Ev/3d), which is summarised below.

#### Western Employment Area

- 4.10 The largest of all the designated Employment Areas is the Western Employment Area, which includes a number of distinct areas within it, such as Arlington Square and Amen Corner. There are also several large out-of-town retail stores located towards the eastern end, such as Wickes and Homebase.
- 4.11 There are three areas on the edge of the Western Employment Area where, since the last plan review, land uses have changed, and it is considered pragmatic to de-designate the associated land without compromising the integrity of the remaining Employment Area:
  - Removal of Beneficial House this was converted to residential and a gym in 2014/15. There is no business use remaining on the site (see Appendix 1).
  - Removal of land occupied by Aspect 1-3 (Trinity Court) and OTV House prior approval was granted for the change of use from office to residential use and the development has been completed. No business use remains on the site (see Appendix 1).
  - Removal of Land between Cain Road and Turnpike Road (3M recreational land) the land is proposed for allocation for residential use through Policy LP4 of the BFLP (site ref: BIN16). The site is considered suitable for residential development and is not in employment use (it was previously in recreational use); it adjoins residential areas to the north and east (see Appendix 1).
- 4.12 There is an area adjacent to the Western Employment Area known as 'Phoenix Business Park'. The buildings in this area comprise Octagon House and Jubilee House offices along with car sales and a repair centre. The collection of buildings are a long established Employment Area, adjoining but not currently within the Western Employment Area, and should be offered policy protection by being included within the Employment Area (see Appendix 1). The Article 4 direction covering the Western

Employment Area would need to be cancelled and replaced by a new one to reflect new boundaries.

# Eastern Employment Area

- 4.13 Parts of the Eastern Employment Area were de-designated through the Site Allocations Local Plan (SALP), and subsequently allocated for housing. The remaining area is a mix of larger office units in Brants Bridge, an NHS walk-in centre, a former car showroom and associated garage, and a mix of offices, light industrial and warehousing units along Eastern Road, including 'the Courtyard'.
- 4.14 A Prior Approval was approved in Brants Bridge for the conversion of 3 large offices (Tamar House, Forth House and Clifton House) into residential units. At the time of writing the scheme is under construction. However, due to their location in the centre of the Employment Area it would not be logical to remove the land from the designated Employment Area. No change to the extent of this Employment Area is proposed through the BFLP.

#### Southern Employment Area

4.15 This area is dominated by buildings used as headquarters by Waitrose, although in recent years there has also been some redevelopment of buildings in the south-eastern part of the Employment Area. The Employment Area does not have the potential for expansion, by virtue of the proximity of the A329 to the north, A3095 to the east and surrounding land uses. Accordingly, no change to the extent of this Employment Area is proposed through the BFLP.

### Vulcan Way Employment Area

4.16 The area comprises mainly light industrial and small warehousing units; its boundaries are constrained by the railway line and surrounding land uses. At the time of writing, the area has not been subject to any Prior Approval Consents. Whilst it has seen one recent change of use to non-BIDS use<sup>26</sup>, this was in the centre of the employment area and its removal would affect the integrity of the employment area. Accordingly, no change to the extent of this Employment Area is proposed through the BFLP.

#### Wellington Business Park

- 4.17 The area contains around 40 small and medium sized units, most of which are occupied and in office use. Units 32 and 35 38 have been converted into residential use under Prior Approval. Units 35-38 are self-contained in the eastern part of the Business Park, and their exclusion from any employment area designation would not prejudice the primary operation of the area. Unit 28 has been granted PAC to convert to residential in both November 2020 and February 2021, but at the time of writing it was unknown whether this is likely to be implemented. Units 28 and 32 are located towards the centre of the Business Park and it would not be logical to exclude these isolated units from any employment area designation.
- 4.18 The ELNS states that there has been strong take up across all bands, but particularly smaller units of less than 10,000 sq ft such as those units at Wellington Business Park.

<sup>&</sup>lt;sup>26</sup> 18/00801/FUL approved August 2018

The high occupancy rates of Wellington Business Park also suggests there is strong demand for units of this size and type – flexible space that could operate as light industrial or office.

- 4.19 There is continued pressure for more units to be converted to residential and it is important that businesses in this location do not find the function of the area compromised by virtue of changes in land use surrounding them. The introduction of residential uses in business areas brings compatibility issues and can detract from the area's attraction as a business location.
- 4.20 The Council has routinely collected data for Wellington Business Park for some years through its annual employment commitments exercise. Any further proposals for non-employment uses will need to be carefully assessed. Policy LP10 therefore designates Wellington Business Park as an Employment Area (see Appendix 1).

#### Broadmoor

- 4.21 Broadmoor Hospital is currently undergoing substantial redevelopment. A new hospital has been built and patients have been moved from the old buildings. In addition to making provision for various forms of residential development on the site, SALP Policy SA4 includes a small research park. As a result, the Employment Area designation was retained at the time.
- 4.22 However, the site is primarily a hospital facility that will ultimately accommodate a significant amount of housing. Whilst it is anticipated that there will be a small research park the site is now predominantly a mixed-use site with mainly non-BIDS uses. The Council is not proposing to direct further BIDS development to this site owing to difficulties with access routes. Therefore, the current employment designation is no longer consistent with the approach taken in other Employment Areas in the Borough. For these reasons, it is proposed to remove the Employment Area designation for Broadmoor through the BFLP (see Appendix 1).

#### Bracknell Town Centre

4.23 Employment development (such as offices) is also focussed in Bracknell Town Centre where it is proposed to take a more flexible approach to facilitate a broad range of economic development. Main town centre uses, as defined by the NPPF, include offices. It is anticipated that redevelopments within the town centre will generate some windfall supply over the plan period, particularly given recent changes to the Use Classes Order (UCO) which now puts offices in the same use class as several other uses notably retail.

#### Conclusions

4.24 The Council considers existing designated Employment Areas to be valuable locations for BIDS employment development in the borough, the location and extent of those around Bracknell having been derived from masterplanning undertaken when Bracknell was designated as a New Town. Protecting the existing stock can help to achieve sustainable communities, and in accordance with national policy, create the conditions in which businesses can invest, expand and adapt, and support economic growth and productivity. Adding a designation to Wellington Business Park is considered a necessary additional measure to help protect existing small business units which are an

important component of employment land supply; an Article 4 direction may also be necessary.

# Impact of Use Class Order changes on employment areas

- 4.25 Following changes to the UCO in September 2020, offices and light industry (Class E) are in a different use class to general industry, storage and distribution (B2 and B8). Class E now brings together the former A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes) and B1 (business) as well as parts of Classes D1 (non-residential institutions) and D2 (assembly and leisure). Changes of use between the different types of uses listed in Class E will not constitute development, and so will not require planning permission. The Government consultation (closed January 2021) on further changes to Permitted Development Rights<sup>27</sup> that would allow Change of Use from Class E to Class C3, and the impact of this could be very significant for employment uses within Class E. The Council will need to monitor this very closely.
- 4.26 The BFLP is not prescriptive about where particular employment use classes will be provided either in Policy LP11 'Sites allocated for economic development/ mixed use' or in the development management policies relating to employment areas (which refer to the collective term 'BIDS'). This provides flexibility for employment land to come forward on the allocated sites and in designated Employment Areas to meet market needs.
- 4.27 While the UCO change allows businesses greater freedom to adapt to changing circumstances and to respond more quickly to their needs, the impact that the change from office floorspace being classified as B1 to Class E in the UCO is yet to be fully understood. The ability for an office to change to other uses within the broad 'Commercial Business and Service' use class such as retail or assembly and leisure in designated Employment Areas, may lead to conflicting land uses. The Council will need to monitor how the market responds to the new Class E Use Class and any future changes to the PDR regulations, through employment commitments monitoring, analysis of planning decisions and land use changes.
- 4.28 As stated earlier, the UCO changes have not resulted in changes to the PPG. It may in due course be necessary to plan further office provision to offset losses to other uses in Class E. Once the impact of the new changes is understood and the evidence base updated, the Council will seek to address any issues through the next Local Plan.

#### Existing retail areas

- 4.29 Bracknell Forest has a well-established network of retail centres, ranging in size and function from local centres meeting day-to-day retail needs to larger district and town centres that provide a broader range of goods and services and serve a wider area.
- 4.30 Bracknell Town Centre is the main shopping destination for residents in the Borough and plays a very important role in creating a sense of place and identity for the Borough. It provides Bracknell Forest's main focus for retailing and is also a focus for leisure and business activity given its highly accessible location at the centre of the Borough's public transport network. The Lexicon opened in September 2017 which has created a new

<sup>&</sup>lt;sup>27</sup> Supporting housing delivery and public service infrastructure consultation: <u>https://www.gov.uk/government/consultations/supporting-housing-delivery-and-public-service-infrastructure/supporting-housing-delivery-and-public-service-infrastructure</u>

social and cultural heart for the town, bringing a high-quality mix of shopping, leisure and vibrant public spaces. The town centre has become an attractive retail destination, drawing from a wider catchment area as a result. The regeneration is ongoing, with further elements due to come forward in the short and medium term. Princess Square has recently been revamped and construction on 'The Deck' is due to commence in the near future.

- 4.31 The Borough's District and Local Centres play an essential role in serving the everyday retail needs of the local community, providing such uses as convenience stores and pharmacies. They are particularly important to residents with limited mobility since they reduce the need to travel by car to shop and are important in creating a sense of community and identity. Such is their importance in creating sustainable communities, centres will continue to be provided as part of new residential developments, e.g. at Jealott's Hill in Warfield.
- 4.32 All the identified centres in the BFLP perform an important function for their local communities, and in some cases for wider communities. Further retail facilities are planned as part of certain strategic developments, for example, land north of Warfield. However, at the time of compiling the BFLP, these had not been completed and are not therefore included in the hierarchy set out in Policy LP12.

# Employment Commitments<sup>28</sup>

- 4.33 The Council undertakes annual monitoring of planning permissions for employment uses through the Planning Commitments for Employment Uses. The monitoring includes both hard and soft commitments relating to permissions where the net change in floorspace is 100m<sup>2</sup> or greater, or where 500m<sup>2</sup> or more of gross floorspace is proposed. The monitoring is for most use classes except self-contained residential accommodation, open sided structures or agricultural buildings (N.B. equestrian uses which are for a commercial purpose are included). In addition to collecting information on the floorspace in different use classes, sites are visited annually and a 'build status' record is kept (i.e. to determine if the permission has been implemented). Data collected also groups permissions into Employment Areas, Bracknell Town Centre and parishes to enable finer grained analysis.
- 4.34 Employment commitments data has been collected for many years, by both the former Berkshire County and more recently by BFC, enabling trends to be identified. It can also be used as the basis for further analysis, including for example the impact of Prior Approval Consents (PAC) and losses to other land uses. The raw data fed into much of the Council's economic evidence base.

<sup>&</sup>lt;sup>28</sup> Economy and employment monitoring

# 5. Strategy to meet employment and economic needs

#### Strategic Housing and Economic Land Availability Assessment

- 5.1 The NPPF (para. 67) requires local planning authorities to prepare a Strategic Housing and Economic Land Availability Assessment (SHELAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing and economic land over the plan period. The SHELAA takes a 'policy off' approach, which is why it includes sites in the countryside and the Green Belt. Whilst it includes information on availability, suitability and likely economic viability, it does not allocate sites/broad locations (or clusters) for future development this is the role of a Local Plan.
- 5.2 The SHELAA is part of the evidence base used to identify sites and locations suitable to meet future development needs set out in the local plan. The Council prepared a SHELAA following a 'call for sites' exercise in 2016. The SHELAA methodology was prepared in accordance with the advice contained in the PPG. Bracknell Forest Strategic Housing and Economic Land Availability Assessment (SHELAA): Part 1 (Methodology) and Part 2 (results) are available to view on the Council's website<sup>29</sup>.
- The Part 2 SHELAA (October 2020)<sup>30</sup> has been updated, since at each consultation 5.3 stage additional sites have been promoted. It contains 91 potential sites for development. A broad assessment of capacity was undertaken (which uses a 'policy-off' approach). This found employment uses (the former 'B' uses and main town centre uses) had a potential yield of 96,665m<sup>2</sup> of gross floorspace. This comprises 52,600m<sup>2</sup> on Bracknell Town Centre sites, 20,800m<sup>2</sup> at Jealott's Hill, 2,800m<sup>2</sup> on BRA1 and 465m<sup>2</sup> on BIN10. A further 20,000m<sup>2</sup> represents an alternative for housing on sites WINK6 and BIN4. Some of these sites are not considered suitable for allocation, and the floorspace capacity of suitable sites has been amended following further assessment through the Housing Background Paper<sup>31</sup>. This includes BRA18 (The Peel Centre and the Point) which the SHELAA estimates has a capacity of 21,800m<sup>2</sup> floorspace in the plan period (approximately 22% of the potential yield), however the site has been allocated for 3,500m<sup>2</sup> floorspace (only 3.6% of the total potential yield) because much of the site will be residential. Therefore, not all the 96,665m<sup>2</sup> floorspace promoted through the SHLEAA is available to meet employment land needs; appropriate sites have been allocated through the BFLP in Policy LP11.
- 5.4 The majority of the sites promoted for development in Bracknell Town were for mixed use. This is in-keeping with the Government's aim of making town centres activity-based community gathering places where retail is a smaller part of a wider range of uses and activities.
- 5.5 The Syngenta site at Jealott's Hill (WAR3) was promoted to the Council in 2016. The proposals comprise a new Science and Innovation Park as part of a sustainable mixeduse development based on Garden Community principles. It was promoted to include, among other uses, new and improved Agri-tech research facilities for the existing occupant (Syngenta) as well as new floorspace for other similar and complementary industries.

<sup>&</sup>lt;sup>29</sup> Local Plan evidence base

<sup>&</sup>lt;sup>30</sup> SHELAA Part 2 results, covering a plan period to 2037 (Oct 2020)

<sup>&</sup>lt;sup>31</sup> Local Plan evidence base

#### Overall employment and economic strategy

- 5.6 One of the six strategic themes of the Council's Plan<sup>32</sup> is economic resilience (as enlarged upon above), including the aim that Bracknell Forest should continue to thrive, even with the challenges ahead for all sectors of the economy and to help retain businesses and attract new companies to the area.
- 5.7 A key component of the BFLP strategy is therefore to stimulate economic growth, particularly in light of the impact Covid-19 is projected to have on the Borough. Recent analysis suggests this could cause a greater fall in Bracknell Forest's economic output (GVA) than the national average<sup>33</sup>.
- 5.8 Whilst the population of Bracknell Forest increased by around 12% over the period 2004-2019, the number of jobs declined by 1.4%. Levels of unemployment have however also fallen over the same period from 3.1% in 2004 to 2.5% in 2019.<sup>34</sup> This suggests that there is an increasing number of residents travelling to jobs outside the Borough.
- 5.9 Bracknell Forest is in the Central Berkshire Functional Economic Market Area (FEMA) since it has strong economic relationships with the Boroughs of Reading, Wokingham and parts of Windsor and Maidenhead. Some movement to jobs outside the Borough is therefore to be expected. Data drawn from the 2011 Census suggested that a significant number of residents travel to the neighbouring Boroughs of Windsor and Maidenhead and Wokingham. This reflects the role of Maidenhead as a popular office location and the inclusion of a large part of the Reading urban area (including parts of the University and business parks) within the Borough of Wokingham. More recently, Central Reading has benefitted from the tendency of occupiers to favour vibrant town centre locations with good connectivity and transport links and it is likely that this is having a further impact on commuting flows from Bracknell Forest.
- 5.10 The main challenges associated with this gradual loss of self-containment are the pressure that it places on transport infrastructure especially at peak times and the loss of a mix of uses which adds to the vibrancy of communities. The Council is therefore keen to support existing businesses and wishes to encourage the area to grow in a sustainable way. This factor has therefore shaped the economic strategy.

#### Employment

5.11 The ELNS (2020) was prepared just before the Covid-19 pandemic, which may result in changes in the working patterns of many people. In many cases employers now recognise that more agile working practices can provide benefits. Recent analysis identifies that 28.5% of residents in the Borough are able to work from home<sup>35</sup>. However, there is a general acceptance that there is still a need to spend time in an office for social interaction, the generation of ideas and learning from colleagues. Although employers may see this as an opportunity to save on property costs, space represents a relatively small proportion of overall costs. Occupiers are likely to be reviewing their space needs particularly in light of the financial struggles businesses now face to get through Covid-19 and BREXIT. Some will inevitably conclude that they

Bracknell Forest Council Pre-Submission Economic Background Paper (Version for Executive/Council March 2021)

<sup>&</sup>lt;sup>32</sup> Council Plan 2019 - 2023

<sup>&</sup>lt;sup>33</sup> Recovering from Covid-19 (Updated Aug 2020)

<sup>&</sup>lt;sup>34</sup> Nomis Official Labour Market Statistics

<sup>&</sup>lt;sup>35</sup> <u>Recovering from Covid-19 (Updated Aug 2020)</u>

simply do not need the amount of floorspace which they currently occupy or require a different form of provision. Data at July 2020 suggests that whilst office vacancy rates have increased (by 7.4%), industrial vacancy rates have reduced since the start of the year (7.1% in July, compared to 7.4% in Q1).<sup>36</sup> This demonstrates that the effects of the pandemic are not altogether clear as yet and need to be monitored.

- 5.12 The focus of the Government's economic and fiscal strategy is on ensuring that it continues to support workers and businesses as the UK recovers from the Covid-19 pandemic. Whilst it would be premature to quantify the impact on future need, the Thames Valley Berkshire LEP suggests that knowledge-based sectors are likely to be more resilient and recover faster from the impact of the pandemic. In Bracknell Forest, these industries generate a larger proportion of jobs than the national average, and so are more important to the Borough than nationally. They include ICT & Digital (5.4 times more important), Advanced Manufacturing (1.3 times more important), Life Sciences (4.2 times more important) and Business Services (1.5 times more important).
- 5.13 However, there are sectors in the Borough that have been severely impacted by Covid-19 that employ thousands of people, including hospitality and tourism; arts, entertainment and recreation; admin and support; aviation; non-food retail and wholesale; manufacturing; and construction. Of these, non-food retail and warehousing is 1.7 times more important locally than nationally and employs approximately 8,500 people<sup>37</sup>.
- 5.14 This highlights the need for flexibility to enable businesses to adapt to meeting changing market conditions and achieve innovations. National policy is also clear that local plans should be flexible enough to accommodate needs not anticipated in the plan and enable a rapid response to changing economic circumstances (NPPF paragraph 81d). For this reason, the BFLP combines the office and industrial figures into a single requirement covering the need for employment floorspace which equates to 68,000m<sup>2</sup> (see Chapter 3 of this paper for how this need was calculated).
- 5.15 The Council wishes to support businesses involved in economic sectors with potential to grow (especially those wishing to co-locate in clusters) by assisting in the provision of new and refurbished floorspace designed to meet future needs. It is hoped that this will encourage growth in jobs and opportunities, together with the ability for people to live and work locally, reducing out-commuting.
- 5.16 To meet identified employment needs and achieve economic resilience the Council is proposing an overall strategy that includes:
  - safeguarding existing Employment Areas
  - safeguarding small business units, including adding a new Employment Area designation to an existing area of small business units (Wellington Business Park)
  - continued regeneration of Bracknell Town Centre
  - allocating sites for mixed-use/economic development
  - creation of a new Science and Innovation Park at Jealott's Hill, Warfield.

<sup>&</sup>lt;sup>36</sup> Recovering from Covid-19 (Updated Aug 2020)

<sup>37</sup> ibid

#### Safeguarding existing Employment Areas

- 5.17 An important component of the BFLP strategy for meeting employment needs is to safeguard existing employment areas from a proliferation of non-BIDS uses. This is done through strategic Policy LP10 'Designated Employment Areas' and associated Development Management Policies LP26 'Development in designated Employment Areas' and LP27 'Employment development outside designated Employment Areas'. As set out in Chapter 4 of this paper, the Borough's existing designated Employment Areas are an important location of business focus and opportunity. The Employment Areas around Bracknell in particular provide space for more extensive industrial, storage and distribution uses. They are accessible from both the strategic road network and local residential neighbourhoods whilst being sufficiently segregated from them to minimise the possibility of conflict between uses. Policy LP10 will safeguard existing Employment Areas, except for of Broadmoor which is proposed for deallocation (see Chapter 4 above).
- 5.18 Whilst it is recognised that some diversification of uses is required in terms of those uses that directly benefit or serve the people working in these locations, it is important to safeguard their employment generating role and maintain an appropriate supply of employment land. Due to the dated nature of some of the buildings, it is likely that there will be opportunities to intensify the use of these areas, which already include some clusters of similar activities. This may include redevelopment of existing sites and premises to make more efficient use of land to provide modern premises, and range of units in terms of size, type and configuration. Retaining their integrity and not compromising businesses to go about their lawful operations, is an important factor in meeting employment needs over the plan period.
- 5.19 The introduction of three Article 4 directions has provided businesses with some security that land-uses around them will not change from offices to residential uses in an uncontrolled manner. Amendments to the extent of the Western Employment Area would require the Article 4 direction to be cancelled and replaced by a new one to reflect new boundaries. Ongoing monitoring of Vulcan Way and Wellington Business Park will aid consideration as to whether these two areas would benefit from an Article 4 direction.
- 5.20 Complementary to this are several development management policies (covered in Chapter 6 of this paper) including LP25 'Designated Employment Areas', LP26 'Employment development outside Designated Employment Areas' and Policy 51 'Pollution and hazards'. This recognises that it is important that existing lawful uses do not become unable to continue their operations due to subsequent new development near them.
- 5.21 The BFLP therefore seeks to concentrate employment development in the designated Employment Areas and the town centre, supporting existing and new businesses through the encouragement of schemes to redevelop sites or extend premises and use land more efficiently. Office development will be encouraged in Bracknell Town Centre and this in turn could make office sites in the Employment Areas available for redevelopment. Policy LP26 'Development within designated Employment Areas' also sets out that office development within the designated Employment Areas is also considered acceptable since it may facilitate clusters or networks of knowledge and data-driven, creative or high technology businesses.

- 5.22 There is a requirement for substantial industrial and distribution floorspace. However, their requirements for access to good strategic infrastructure and a large amount of land, limits the locations where this floorspace could be provided in the Borough. The existing Employment Areas are the most suitable locations, particularly the ones around Bracknell Town. Redevelopment of existing land in these areas is likely to be the best source of meeting these needs over the plan period.
- 5.23 Safeguarding Employment Areas also has a complementary role in protecting residential areas from intensive BIDS development. This will help to ensure that the Borough achieves the BFLP vision to protect and support existing key Employment Areas, enabling them to adapt to changes in how people work and new business models, and for the Borough's economy to be dynamic, responsive and thriving with specialised sectors contributing to the wider area.

# Small businesses units

- 5.24 An important component of employment provision in the Borough is small business units of less than 500m<sup>2</sup>. These provide opportunities for start-up businesses, and also for ancillary businesses needed to support larger businesses. Data shows that the Borough is home to many successful business 'births' each year, with nearly 60% surviving over three years<sup>38</sup>. Given their smaller size, such business units are particularly vulnerable to changes of use to seek higher land values, such as residential. Data from employment commitment monitoring in recent years has shown that several small business units have been lost from BIDS use to residential<sup>39</sup>.
- 5.25 An assessment undertaken in 2019 by the Thames Valley Berkshire LEP<sup>40</sup>, recommended that Berkshire should create more small 'affordable' innovation spaces within main town centres, as was done with the Bracknell Enterprise and Innovation hub located in Ocean House. It stated that there is a gap in the market for this affordable provision, and it was important to recognise that most small and/or new enterprises are not particularly profitable and property costs can be significant.
- 5.26 Through Policy LP10 the Council is designating Wellington Business Park as an Employment Area, to recognise the importance of such areas in providing smaller scale premises that can lead to diverse business opportunities. Some of Wellington Business Park has already been subject to changes of uses to residential, and so maintaining the integrity of the remaining area is of high importance. Development management Policy LP28 'Smaller businesses' has a complementary role in the BFLP economic strategy by recognising the importance of, and seeking to safeguard, small business units both in Employment Areas and more widely in the Borough.

# Bracknell Town Centre

5.27 A further focus of economic development is Bracknell Town Centre, where a more flexible approach will be taken to facilitate a broad range of economic development, which is vital for the future. However, although the NPPF directs offices to town centres, given the wide range of uses suitable for a town centre location, there may not be sufficient capacity to meet the full forecast need for offices in these locations. This will,

<sup>&</sup>lt;sup>38</sup> Business in Berkshire 2019

<sup>&</sup>lt;sup>39</sup> Economy and employment monitoring

<sup>&</sup>lt;sup>40</sup> An assessment of the availability and role of innovation spaces in Berkshire (June 2019)

depend in part on the demand from retail and other operators of town centre uses. As such, office development within the designated Employment Areas will be considered acceptable. There may also be opportunities for economic development which has not been specifically identified and is not located in existing established employment locations.

# Mixed-use allocations

- 5.28 Although employment practices and markets are continually evolving and have resulted in less demand for land, in recent years there have been more houses delivered in the Borough than jobs. This has partly been through strategic plan making based on the best available evidence at the time. However, more recent pressures have seen employment land converted to higher land values, which have been largely outside the Council's control. This includes a raft of changes made through permitted development rights, such as enabling the conversion of offices to residential through the prior approval process. This has added to the recent trend whereby more homes than jobs have been provided. To help ensure that the Borough does not become a dormitory town for commuters (with associated infrastructure pressures), and in line with the Government aim to build a strong and competitive economy, the BFLP seeks to address the situation and allocate land which will generate new economic floorspace, providing employment opportunities in the future. This includes a significant allocation at Jealott's Hill, Warfield which will see the creation of a new Science and Innovation Park. This will also help to provide employment opportunities in the north of the Borough and improve levels of selfcontainment and counter the low level of economic growth seen in recent years.
- 5.29 Most of the sites proposed for allocation are in/around Bracknell Town Centre, and are for mixed-use development for both residential and economic uses. The total amount of net floorspace allocated through Policy LP11 is 91,524m<sup>2</sup> (of which 57,382m<sup>2</sup> is to be delivered in the current plan period). This comprises the sites in Table 3 below as well as 'the Peel Centre and the Point' (-12,139m<sup>2</sup>) and the local centre floorspace proposed at Jealott's Hill Warfield (1,528m<sup>2</sup>, of which 836m<sup>2</sup> is to be delivered plan period). Accordingly, the Policy LP11 figure is made up of component parts which include a mix of employment, Agri-tech floorspace and retail uses. The latter sees a net loss due to the allocation of the Peel Centre and The Point. As this is considered to distort the potential supply of land for employment, the Peel Centre and The Point site is not shown in Table 3 below and is discussed separately. Similarly, the local centre element of the Syngenta site is also not counted in Table 3 since it relates to retail uses. This is why Policy LP11 and Table 3 do not fully align.
- 5.30 Whilst it is acknowledged that the floorspace at Jealott's Hill will have an Agri-tech focus, it is unclear at this stage how much displacement from other parts of Bracknell Forest to Jealott's Hill will occur (see paragraph 5.42 below). Whilst some of the sites allocated through Policy LP11 are currently in commercial uses, overall redevelopment of the sites will result in net gains of economic floorspace (see Table 3 below). Although the aim of Policy LP11 is to generate an increase in jobs in the Borough, the Policy allocates sites with estimated floorspace net capacity since the Council has a degree of control over floorspace provided as part of the mixed-use developments, but not job generation (which is an indirect measure of the amount of economic land developed).

Table 3: Gross and net floorspace based on Policy LP11 mixed-use allocations

Site reference (as used in SHELAA)	Address	Approximate Gross Capacity (m <sup>2</sup> )	Existing floorspace to be demolished (m <sup>2</sup> )	Approximate Net Capacity (m <sup>2</sup> )
BRA7	Town Square, The Ring	7,100	-3,940	3,160
BRA12	Former Bus Depot, Market Street	4,700	0	4,700
BRA14	Jubilee Gardens, The Ring	5,100	0	5,100
BRA15	Land east of Station Way and north of Church Road (Southern Gateway)	9,400	0	9,400
BRA17	Bus Station, The Ring	7,800	-225	7,575
WAR3*	Jealott's Hill, Warfield	86,500 (*53,050 in plan period)	-14,300 (Research and Development; this amount to be re- provided)	72,200 (*38,750 in plan period) and
Totals		120,600	-18,465	102,135 (*68,685 in plan period)

- 5.31 Given there is a positive need for office floorspace identified in the ELNS, it is not unrealistic that the sites in Bracknell Town Centre allocated through Policy LP11 will deliver additional office space. There is considerable uncertainty over the full impacts of the Covid-19 pandemic, Brexit and Use Class E. Therefore the Council is taking a flexible approach enabling the market to decide the most suitable economic elements for these sites. A prescriptive approach would not enable a rapid response to changes in economic circumstances as required by national policy (NPPF paragraph 81d).
- 5.32 Although included in Policy LP11, the Peel Centre and the Point is not shown in Table 3 above since it relates to a loss of retail rather than employment floorspace and therefore distorts the supply available to meet identified needs. The site is located on the periphery of Bracknell Town Centre and is a previously developed site in a highly sustainable location. Whilst the majority of the site comprises retail warehousing, there is also a supermarket, restaurants and leisure facilities, which together total 24,138m<sup>2</sup>. Policy LP8 'The Peel Centre and The Point' allocates the site for mixed use, with a predominantly residential-led scheme but retaining supermarket provision (approximately 3,000m<sup>2</sup>), and also other economic uses of around 500m<sup>2</sup> floorspace. This policy is consistent with NPPF Chapter 11 in making effective use of land.

- 5.33 Policy LP11 sets out that overall there will be a net loss of just over 12,000m<sup>2</sup> economic floorspace compared to existing<sup>41</sup>. Although the housing trajectory considers the residential element is likely to be delivered beyond the plan period, it is being assumed the loss of retail and gain in the replacement supermarket and new commercial floorspace will occur within the plan period.
- 5.34 The regeneration of Bracknell Town Centre, particularly the opening of the Lexicon, together with the difficult retail market has resulted in some duplication of tenants. Hollywood Bowl has confirmed that it will be relocating to the new bowling alley at the 'The Deck' once it's built (the next phase of planned regeneration in Bracknell Town Centre).<sup>42</sup> The design of the units is dated and does not meet the needs of increasingly discerning occupiers and consumers making its current format unlikely to be viable in the longer term. A recent report by KPMG suggests town centres could be relatively hard hit by the Covid-19 pandemic; the impact this will have on demand for retail floorspace is as yet unknown.
- 5.35 The Housing Secretary Robert Jenrick has also stated that the Covid-19 pandemic has created a generational opportunity of the repurposing of offices and retail as housing for urban renewal.<sup>43</sup> It is considered that the redevelopment of the Peel Centre and The Point in accordance with Policy LP8 would fulfil such an opportunity as outlined by the Government. Indeed, a December 2020 consultation<sup>44</sup> set out the potential for Class E (including retail) to be able to convert to residential development via permitted development.
- 5.36 All the factors set out above could result in piecemeal redevelopment of the site over the plan period and land being underutilised or potentially left vacant. The NPPF is clear that Councils should be proactive in making effective use of land, and that good design is integral to good planning. A comprehensive, well-designed, mixed-use redevelopment of the Peel Centre and The Point site is therefore proposed, retaining a supermarket and providing some smaller retail units that meet current expectations and serve the increasing number of people living in the wider area.

New Science and Innovation Park, Jealott's Hill

- 5.37 The Jealott's Hill site includes approximately 18ha of built envelope/ previously developed land and has been used for agricultural research and development for over 90 years. The employment proposals for the site take the form of refurbished and replacement facilities for the current occupier (Syngenta), along with a new Science and Innovation Park. This would develop modern flexible employment floorspace for both collaboration and wider business space. New occupiers are considered likely to have a research and development focus, but could include sectors as diverse as digital technology, engineering and waste management for example. The target market for future occupiers has a wider sector focus and is therefore more diverse than the existing use of the site.
- 5.38 Syngenta currently has 60,600m<sup>2</sup> of floorspace at Jealott's Hill; it will retain 46,300m<sup>2</sup> (refurbishing some of this) of this floorspace and demolish 14,300m<sup>2</sup>. The proposals for

<sup>&</sup>lt;sup>41</sup> The loss of leisure uses at The Point is counted separately. See Table 5 of this Paper.

<sup>&</sup>lt;sup>42</sup> The Deck development

<sup>&</sup>lt;sup>43</sup> LocalGov press statement

<sup>&</sup>lt;sup>44</sup> Supporting housing delivery and public service infrastructure

the site include redeveloping 14,300m<sup>2</sup> of new modern floorspace for its own expanded Agri-tech research function, which will be funded by Syngenta. This will be provided within the plan period. Overall Syngenta will therefore continue to occupy 60,600m<sup>2</sup>. Whilst this results in no net change of floorspace being occupied by Syngenta, this is because improved facilities and changing towards open innovation will enable increased productivity. There is the possibility that Syngenta may take up more floorspace in the future. This element of the site development will retain the existing 850 FTE jobs.

- 5.39 The new Science and Innovation Park is proposed to have 72,200m<sup>2</sup> floorspace available to businesses in the Agri-tech market. It is anticipated that development of the Science and Innovation Park will be in five phases, resulting in 38,750 m<sup>2</sup> net floorspace being delivered within the plan period to 2036/37.
  - Phase 1 (2025/26-2027/28) 5,000 m<sup>2</sup>
  - Phase 2 (2028/29 2031/32) 15,000 m<sup>2</sup>
  - Phase 3 (2032/33 2035/36) 15,000 m<sup>2</sup>
  - Phase 4 (2036/37 2039/40) 15,000 m<sup>2</sup> (of which 3,750 m<sup>2</sup> will be delivered in the plan period by 2036/37)
  - Phase 5 (2040/41 2043/44) 22,200 m<sup>2</sup>
- 5.40 It is anticipated that the new Science and Innovation Park once completed would generate approximately 2,000 additional on-site jobs. It is considered that there is sufficient talent in target sectors to support the creation of this number of jobs. The limited provision of science and innovation space in the Thames Valley and lack of direct competition for the scheme nationally suggests strong market interest is likely.
- 5.41 In total 86,500m<sup>2</sup> gross floorspace (72,200m<sup>2</sup> net increase compared to existing) will be built in the form of improved Syngenta facilities and a new Science and Innovation Park. Overall this will be a significant net gain in employment floorspace for Bracknell Forest. On completion, the total amount of employment floorspace at Jealott's Hill will be 132,800m<sup>2</sup>. It will also result in continued and enhanced inward investment in the Borough and Thames Valley region, supported by the Draft BLIS (consistent with NPPF paragraph 81).
- 5.42 Due to uncertainties about how many local firms will move to the new Agri-tech campus at Jealott's Hill, it is unclear how much displacement from Bracknell/ the rest of the Borough will occur, thereby providing supply to meet needs identified in the ELNS. Although the Syngenta proposal may not fully address normal employment needs, the net figures for the Science and Innovation Park have been counted in Policy LP11. This is due to the number of additional job opportunities anticipated from the campus at Jealott's Hill and the uncertainty over the impacts this will have on increasing employment land supply in the rest of the Borough.
- 5.43 Policy LP7 'Land at Jealott's Hill, Warfield' requires the whole Jealott's Hill site to be covered by a masterplan which will be agreed with the Council. In order not to prejudice this process, it has not been possible to define the exact extent of the Employment Area (and therefore draw a boundary on the Policies Map) at Jealott's Hill.
- 5.44 In addition to the Science and Innovation Park, development of the site will generate a range of other jobs post-construction as shown in Table 4. This includes teachers for the school and nursery, staff for the supermarket, retail and food/ beverage, health centre and veterinary clinic. There will be some associated supporting/ supply chain jobs for

the Science and Innovation Park and new facilities i.e. cleaners, deliveries, maintenance etc which cannot be quantified at this point. It is estimated that in the region of 229 jobs could be generated from these associated uses at Jealott's Hill. The jobs that will be created that are additional to the Syngenta facilities and Science and Innovation Park, and all contribute to the aim of national planning policy to create a strong, competitive economy and inclusive communities.

Use	Net Floorspace (m2) / Units/ Forms of Entry (FE)	Of which floorspace in the plan period to 2037	Direct FTE Jobs (overall)	Of which direct FTE Jobs (in plan period to 2037)
Supermarket	760 sq.m	373	43	21
Retail	480 sq.m – 5 units	283	27	16
Food and	288 sq.m – 3 units	180	16	10
Beverage				
Health Centre	1 Unit		62	-
Veterinary Clinic	1 Unit		11	-
Nursery	4 Units		40	20
Primary School	3 FE		30	20
Total	1,528	836	229	87

Table 4: Estimated additional floorspace and jobs to be created at Jealott's Hill (excluding Syngenta and new Science and Innovation Park)

- 5.45 Although there will be a local centre at Jealott's Hill to meet day-to-day needs, this will not detract from the objective to support the ongoing regeneration of Bracknell Town Centre, since it will provide sustainable, complementary facilities for new residents and the workforce.
- 5.46 Policy LP7 'Land at Jealott's Hill, Warfield' sets out the requirements for this comprehensive mixed-use development. The exceptional circumstances justifying its allocation are set out in the 'Jealott's Hill Background Paper'.<sup>45</sup>

#### Economic

- 5.47 An objective of the BFLP is to plan for the continued regeneration of Bracknell Town Centre to accommodate a range of uses to support and expand its role as the main retail, leisure and cultural centre for the Borough, whilst maintaining the vitality and viability of all other identified retail centres within the Borough.
- 5.48 To meet wider economic needs the Council is proposing an overall strategy that includes:
  - Continued regeneration of Bracknell Town Centre
  - Safeguarding of existing centres
  - Mixed-use allocations in Bracknell Town and Warfield through Policy LP11.

<sup>&</sup>lt;sup>45</sup> Jealott's Hill Background Paper (LP/Ev/5h)

### Continued regeneration of Bracknell Town Centre

- 5.49 Bracknell Town Centre and its adjacent area is an important employment and commercial centre and as the most accessible location in the Borough, offers the widest range of services and facilities. Until the opening of the Lexicon, there had been little development in Bracknell Town Centre since the 1980s, when Princess Square opened. The mix of uses, urban environment and floorspace did not meet modern requirements and aspirations.
- 5.50 The redevelopment of large parts of Bracknell Town Centre to create The Lexicon has resulted in substantial improvements in the overall shopping and leisure experience and has stimulated the evening economy. There has also been a significant increase in the amount of residential accommodation in the Town Centre as a result of the redevelopment and conversion of lower quality office buildings. These developments have been supported by improvements to the public realm and transport infrastructure including the enhancement of footpaths, cycleways and car parks together with major highway improvements to roads such as Millennium Way.
- 5.51 To date, phases 1 and 2 of the Bracknell Town Centre regeneration have been completed.
  - Phase 1 was completed in 2011 with the opening of the Waitrose store on Bond Way.
  - Phase 2 was completed in September 2017 when the Lexicon opened. The development included:
    - 70 new retail and food and beverage outlets, including two 80,000 sq ft stores housing Fenwick and Marks and Spencer, and a 12-screen cinema
    - o 3,800 spaces were provided in new or upgraded car parks
    - Eight core buildings and six place making squares for events and activities
    - $\circ~$  £6.5 million extra investment in the highway infrastructure from Bracknell Forest Council
- 5.52 Phase 3 is ongoing and includes plans for Easthampstead House (site BRA7), Market Square and the Southern Gateway (BRA15) (two of which are allocated through Policy LP11). In addition, internal works to improve Princess Square have recently been completed, and there are two extant permissions<sup>46</sup> for large flexible uses at first floor level for leisure uses (gym and children's nursery/ gym the latter will be able to be accessed outside of operating hours of Princess Square). There are also plans to redevelop the area around the old Bentalls store, called 'The Deck' which will provide new retail, food, drink and leisure facilities<sup>47</sup>. Redevelopment of 'The Deck' will help Bracknell to complete its town centre retail and leisure offering, improve connectivity from Princess Square to the rest of the town centre and safeguard the town centre and provide jobs (following the impact of Covid-19 and Brexit) whilst improving the Western Town Centre Gateway<sup>48</sup>.
- 5.53 In terms of the evening and night-time economy, Bracknell Town Centre is considered to perform poorly against the UK average with an undersupply of culture and entertainment

<sup>&</sup>lt;sup>46</sup> Permissions 19/00935/FUL and 20/00004/FUL

<sup>&</sup>lt;sup>47</sup> Permissions 16/01252/FUL and S73 20/00457/FUL

<sup>&</sup>lt;sup>48</sup> <u>The Deck – Full Business Case (October 2020)</u>

venues, bars, clubs and pubs. It has been cited<sup>49</sup> that demographic shifts and an emergence of the "millennial" generation has led to an increasing trend for people to want to be close to local amenities and working environments, which successful towns have embraced. The focus needs to be not just on providing places to work and live, but also the provision of a high quality mixed-use urban environment, where residential, retail, leisure and office property are located side-by-side. Schemes such as the Deck, and the other proposed mixed-use allocations through Policy LP11 seek to adopt this approach and improve the competitive advantage of the Town Centre.

- 5.54 To ensure that town centres remain viable they must offer experiences that cannot be matched by online shopping. This means that they need to be given scope to diversify and evolve. The Council therefore wishes to encourage proposals for complementary town centre uses of an appropriate scale to support the role of town centres as social spaces, increase customer dwell time, and have the potential to make them more interesting places to visit. This requires a flexible planning approach that encourages investment, not just through economic policies but also by ensuring that local infrastructure and the Borough's environment are of a high quality. The position will be assisted by changes in planning legislation aimed at simplifying processes and allowing greater flexibility of use. These include the introduction of Use Class E which incorporates former use classes A1-3 (shops, financial services and restaurants) as well as Class B1 (business primarily office space).
- 5.55 By directing further economic growth to the allocations identified in Policy LP11, the BFLP will help support the continuing regeneration and ongoing viability of the centre, including harnessing improvements to the night-time economy. It also reflects the strategy of focusing a significant proportion of residential development in Bracknell Town Centre, encouraging it to become an activity-based community gathering place with a high quality mixed-use urban environment, where residential, retail, leisure and office property are located side-by-side.
- 5.56 It is likely that some of these schemes will include offices to help meet the need for flexible small to medium sized units in a town centre environment. This will provide opportunities for occupiers of sites in defined Employment Areas to re-locate and for those sites to be redeveloped for other employment uses if the market indicates a need. It will bring more people into the town centre, with associated additional spending potential. Active uses, such as retail uses, cafes and restaurants will be encouraged on the ground floor of appropriate buildings to assist with ongoing viability and vitality of the area.
- 5.57 The Local Plan strategy also accords with the Bracknell Town Centre Vision 2032 in which the Council confirms its commitment to unlock growth and for further regeneration of the town centre.
- 5.58 It is set out in BFLP Policy LP15 'Design Principles' that Masterplans and Design Codes will be required for larger, complex or more sensitive developments to agree an overall vision and strategy for a development that demonstrates a high quality, comprehensive approach to design. A masterplan will be required to be agreed with the Council, ideally prior to the submission of any planning applications for such a site. Design Codes will be required as part of any Full or Reserved Matters applications for sites with a masterplan and similarly these ideally agreed with the Council prior to submission.

<sup>&</sup>lt;sup>49</sup> The Deck – Full Business Case (October 2020)

Policy LP15 requires an update of the Bracknell Town Centre 2002 masterplan, and also lists The Southern Gateway (BRA15), Easthampstead House (BRA7) and the Peel Centre and The Point (BRA18) as allocations requiring a comprehensive approach to design.

5.59 SALP Policy SA12 designates the Peel Centre as an edge of centre retail warehouse park. In accordance with the NPPF which defines an edge of centre as being within 300m of the town centre boundary, the BFLP removes this designation from the Peel Centre and The Point, since the NPPF definition now covers a wider area than this policy. Whilst it is intended to retain a supermarket and some commercial uses at the site, these are not considered to need a separate designation.

# Safeguarding district and local centres

- 5.60 Bracknell Forest has a well-established network of centres, ranging in size and function from local centres meeting day-to-day retail needs to larger district and town centres that provide a broader range of goods and services and serve a wider area. These are established in strategic Policy LP12 'Hierarchy and extent of centres' and defined on the Polices Map.
- 5.61 In spite of the development that has taken place over the last few years, the layout of Bracknell still follows the principles that guided its development as a New Town in that it comprises a series of residential neighbourhoods. These are arranged around a network of local centres that contain valued community facilities and shops together with good access to extensive greenspaces. Responses to consultations during the preparation of the BFLP highlighted the importance of retaining these features.
- 5.62 The district centres of Crowthorne and Sandhurst are vibrant centres with a focus on smaller retail units, restaurants and coffee shops. These settlements do not have as wide a range of services and facilities as Bracknell Town Centre, but, are still sustainable locations. They provide a varied retail and leisure range that helps meet local convenience and day-to-day shopping needs. Their comparison goods offer is limited compared to primary town centres, and therefore they serve a more local catchment. It is important that the viability and vitality of the district centres of Crowthorne and Sandhurst are supported to help maintain the functionality of the area. Whilst options for growth in these centres are limited, there may be small scale opportunities for intensification and extensions where appropriate. This would assist in ensuring that suitable floorspace is available to allow centres to adapt and meet the changing needs of local communities.
- 5.63 Other Local Centres are also important in helping to meet the day to day needs of local residents, providing uses such as convenience stores and pharmacies. Some include valued community facilities. They are particularly important to residents with limited mobility, as they reduce the need to travel by car to shop and are also a focus for creating a sense of community and identity. Such is their importance in creating sustainable communities, local centres will continue to be provided as part of new residential development, i.e. at Jealott's Hill, Warfield.
- 5.64 The importance of local convenience stores, post offices and chemists outside defined centres in providing essential services to the community they serve is recognised in the BFLP. Such uses can be hubs of the community, important for community cohesion and

have a valuable role to play in social inclusion. These uses are protected by development management Policy LP 32 'Protection of community facilities and services'.

5.65 Since all identified centres perform an important function for their local communities, the BFLP seeks to safeguard them through Policy LP12 and also ensure that development proposals are consistent with their role and function. Policy LP12 sets out that proposals 'will be supported where they are consistent with the role and function of that centre, having regard to their place in the hierarchy'. This is supplemented with criteria-based development management policies, including one which specifies the proportion of non-E Class uses that should be within primary shopping area in each centre (all centres and their primary shopping area extent can be found in Appendix 3 of the BFLP).

### Mixed-use allocations

- 5.66 As has already been discussed as part of the employment strategy, further developments including the potential for economic floorspace are planned on sites allocated for residential/mixed use development through Policy LP11. Most involve previously developed land and provide opportunities to improve linkages and supplement the current offer of Bracknell Town Centre with complementary and innovative forms of floorspace. They will help Bracknell Town Centre to respond to continuous changes and the need to have a character and offer that distinguishes it from other competing centres.
- 5.67 Policy LP11 is deliberately flexible with regard to the type of commercial floorspace that could be provided on the site allocations; with future uses potentially helping to meet identified employment or wider economic needs. This is to enable the sites to respond to changing market conditions over the course of the plan period. This is consistent with the aims of the NPPF to "help create the conditions in which businesses can invest, expand and adapt" (paragraph 80), and specifically paragraph 81(d) to "be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."
- 5.68 Such an approach accords with the aims of the new Use Class E, with flexibility also supported by commercial agents.<sup>50</sup> Whilst physical stores will remain vital for retailers for customer interaction and branding purposes, retailers will also be shifting to supporting the rise of the multichannel consumer. This is a consumer who buys through e-commerce, via mobile commerce and social media as well as in physical stores. A recent independent report by KPMG<sup>51</sup> suggests town centres could be relatively hard hit by the Covid-19 pandemic which has accelerated shifts to online shopping and home working (with associated reduced trips to town centres).
- 5.69 The Retail Technical Review identified some floorspace needs (see Chapter 3 of this paper), and asserted that actual capacity needs for additional floorspace could be much lower. It recommended that a new household survey is needed once shopping patterns are no longer directly affected by Covid-19 (in order to fully understand and evidence changing shopping patterns within the wider sub-region). For these reasons, and due to the amount of vacant and pipeline floorspace available, the BFLP has not carried this forward into a floorspace requirement. When combined with the points above, the

<sup>&</sup>lt;sup>50</sup> Article from a property agent

<sup>&</sup>lt;sup>51</sup> The future of towns and cities post Covid-19 (January 2021)

evidence indicates that specific retail allocations would be premature at this time, and it is likely the amount of retail floorspace needed will decline. The flexible approach of not specifying the types of commercial floorspace anticipated on the mixed-use site allocations in Policy LP11, will enable the centre to respond as appropriate to market changes. Development management policies LP29 'Development in Bracknell Town Centre' and LP30 'Development proposals in centres' complement this flexible approach and will further enable opportunities for economic growth.

- 5.70 It is envisaged that mixed-use development will include some office floorspace in accordance with national policy which treats offices as a main town centre use. Whilst the appeal of Bracknell Town Centre as a location for office development has declined in recent years, this has been primarily due to the poor environment which has now been addressed through the regeneration scheme.
- 5.71 The BFLP encourages active ground floor frontages of appropriate buildings in town centre locations. This was recently demonstrated by the redevelopment of Winchester House, which is a primarily residential-led scheme, but with some retail units at ground level. This approach accords with the Bracknell Town Centre Vision 2032 which also seeks mixed uses, including housing, along with other complementary town centre uses animating the ground floor frontages.
- 5.72 As set out under the 'new Science and Innovation Park, Jealott's Hill' the redevelopment of this mixed-use allocation will include the creation of a local centre, which will include retail, supermarket, and food and beverages. This will create 1,528m<sup>2</sup> of additional economic floorspace (836m<sup>2</sup> within the plan period). The local centre will include a nursery, vet, and a primary school and is anticipated to deliver approximately 229 jobs (approximately 87 during the plan period) (see Table 4).

### Additional floorspace losses

- 5.73 Policy LP11 proposes several mixed-use allocations which overall see a net gain in economic floorspace. However, two sites result in loss of leisure floorspace which does not typically generate a high number of associated jobs. Similarly, Policy LP4 proposes two sites for housing which will not see any replacement of economic floorspace on site. Additionally, the existing uses seen on these sites have not been included within the evidence base behind Policy LP11, and so the floorspace in Table 5 below has not been included as part of the table within that policy.
- 5.74 Site BRA13 is part of a Joint Venture project with Bracknell Forest Council and Countryside Properties<sup>52</sup>. The existing uses on the site will be accommodated in other buildings in Bracknell Town Centre.

<sup>52</sup> Coopers Hill website

 Table 5: Other losses of floorspace

Site reference (as used in SHELAA)	Address	Use	Approximate Gross Capacity (m²)	Existing floorspace to be demolished (m <sup>2</sup> )	Approximate Net Capacity (m <sup>2</sup> )
BIN16	Land between Cain Road and Turnpike Road (3M Recreational Land)	Private Leisure	0	-300	-300
BRA7*	Town Square, The Ring	Library		-1,407	-1,407
BRA18*	The Point, Skimped Hill Lane	Leisure	0	-8,449	-8,449
BRA13	Coopers Hill Youth and Community Centre, Crowthorne Road North	Mixed-use including community centre, Leisure, Nursery and ancillary offices	0	-1,244	-1,244
Total			0	-11,400	-11,400

\*Other losses and the gain at these sites are counted under Policy LP11.

## 6. Duty to Cooperate

- 6.1 The Duty to Cooperate puts the onus on individual Councils to work collaboratively to resolve wider needs within housing and economic market areas.
- 6.2 The starting point in working collaboratively has been for each authority to try to meet its own need.
- 6.3 Joint work was undertaken on producing the Berkshire FEMA Study (2016) with other Berkshire authorities so there is a consistent approach across the area. Hart and Surrey Heath which adjoin BFC are in Hampshire and Surrey respectively and used different consultants. In producing the Berkshire FEMA study, consultation took place on both the methodology and the emerging findings with a large number of stakeholders (including neighbouring Hart and Surrey Heath) as part of the ongoing duty to cooperate.
- 6.4 Surrounding authorities and other key stakeholders were consulted on the FEMA and EDNA during their preparation as part of the ongoing duty to cooperate (see Appendices 3 7 Central Berks FEMA/EDNA). The Council also responded to consultation requests from other authorities when their FEMA/ EDNAs were being prepared.
- 6.5 Joint work was also undertaken on the ELNS with Wokingham and West Berkshire Councils. In producing the study, a technical briefing was held for Duty to Cooperate bodies which was attended by a number of district councils from the surrounding area and a presentation was made available to those who couldn't attend.
- 6.6 The Western Berkshire Retail and Commercial Leisure Assessment (2016) was a joint study comissioned by BFC, Wokingham Borough Council, Reading Borough Council and West Berkshire Council to ensure a consistent approach across western Berkshire.
- 6.7 The approach in the Reading Borough Local Plan (2019) means that it is likely to meet a greater proportion of Central Berkshire's need for offices than identified in the EDNA, as it has an overprovision of up to 60,000m<sup>2</sup> up to 2036 which could contribute to the wider needs of the FEMA.
- 6.8 Through ongoing Duty to Cooperate discussions, responses to other Local Authorities consultations and regular Berkshire meetings, BFC raised on an ongoing basis that evidence was suggesting a need that was considerably greater than the supply that had been promoted through the SHELAA, and that it was unlikely Bracknell Forest would be able to meet employment needs in full.

## 7. Regulation 18 consultation responses

- 7.1 The BFLP has been published for five consultations and the main issues raised are summarised in the BFLP Interim Consultation Statement. The consultations included two Regulation 18 consultations on the full draft plan (Draft BFLP 2018 and Draft BFLP Revised Growth Strategy (2019)) and the main issues raised with regard to strategic economic matters were:
  - The FEMA is not supported
  - There is a need for more economic floorspace to meet the projected need
  - The figures in the EDNA don't reflect the market
  - The Retail Study needs updating
  - The Peel Centre/The Point should be redeveloped
  - The Employment Land Needs Summary does not take account of opportunities to boost growth and Jealott's Hill provides such an opportunity
  - Concerns surrounding the economic justification for development at Jealott's Hill
- 7.2 In response to these concerns the EDNA<sup>53</sup> has been updated by the Bracknell Forest Employment Land Study (2020)<sup>54</sup> which identifies a lower need for office, industrial and warehousing floorspace than the EDNA. The Council has also commissioned further evidence in The Town Centre Retail Needs: Technical Review (2020)<sup>55</sup> which updates the 2016 Western Berkshire Retail and Commercial Leisure Assessment. Based upon an assessment of the various functional economic markets that operate in Berkshire, the FEMA<sup>56</sup> concluded that the Central Berkshire FEMA was appropriate for Bracknell Forest. In terms of allocations 'The Peel Centre and The Point' and Jealott's Hill are allocated for mix-used development in the Pre-Submission BFLP (2021). The economic justification for Jealott's Hill is set out in the 'Jealott's Hill Background Paper'<sup>57</sup>.

<sup>&</sup>lt;sup>53</sup> <u>Central Berkshire Economic Development Needs Assessment (CLP/Ev/3b)</u>

<sup>&</sup>lt;sup>54</sup> BFC Employment Land Needs Study (2020) (LP/Ev/3e)

<sup>&</sup>lt;sup>55</sup> Town Centre Retail Needs Technical Review (LP/Ev/3e)

<sup>&</sup>lt;sup>56</sup> Berkshire Functional Economic Market Assessment (CLP/Ev/3a)

<sup>&</sup>lt;sup>57</sup> Jealott's Hill Background Paper (LP/Ev/5h)

### 8. Development management policies

- 8.1 An important complementary role to meeting identified needs through allocations, is the ability to ensure that the integrity of existing employment areas is protected from redevelopment to non-BIDS uses. Development in retail centres should enable vitality and viability and these areas should be protected from development that might divert trade away from them. The development management policies in the BFLP were developed in consultation with other teams across the Council including, business, regeneration team, development management etc.
- 8.2 Policy LP26 'Development within designated Employment Areas' seeks to focus business, industry, distribution and storage uses to Employment Areas and to resist non-BIDS uses (except ancillary uses). This policy complements strategic Policy LP10 'Designated Employment Areas' by seeking to safeguard existing employment uses, since they are key areas in the Borough that contribute significantly to the employment land supply and provide areas for businesses to flourish.
- 8.3 Policy LP27 'Employment development outside designated Employment Areas' acknowledges that these areas are valued for the job opportunities they provide, but seeks to ensure they do not have unacceptable adverse impacts on residents, other businesses or uses. The policy also sets out that large scale proposals will need to be accompanied by an Employment Impact Statement, which includes a sequential test. This policy complements strategic Policy LP10 and development management Policy LP26 by ensuring that large scale employment development is located in appropriate places.
- 8.4 Policy LP28 'Smaller businesses' seeks to assist smaller and start-up businesses to enable their expansion, subject to highway and residential amenity considerations. It also sets out that ancillary uses within designated Employment Areas are appropriate and seeks to safeguard existing smaller business units from being lost by setting out criteria to ensure they have been actively marketed on reasonable terms. The policy acknowledges small businesses and emerging economic sectors fulfil an important role in the Borough's economy and can help achieve a sustainable approach to development by providing jobs across the Borough. It also complements strategic Policy LP10 which designates Wellington Business Park as an Employment Area.
- 8.5 Policy LP29 'Development in Bracknell Town Centre' seeks to attract a range of main town centre uses, including offices, leisure and cultural uses that support the day-time and evening economy. It encourages further residential development and a mix of appropriate supporting facilities and services, to enable the continued regeneration of further parts of Bracknell Town Centre. It's main aim is to ensure that development contributes to the diversity, vitality, viability and environmental quality of the town centre, and sets out the extent of the defined Primary Shopping Area. The Policy complements strategic Policy LP12 'Hierarchy and extent of centres' which establishes the retail hierarchy in the Borough.
- 8.6 Policy LP30 'Development proposals in centres' seeks to maintain and enhance the vitality and viability of centres listed in strategic Policy LP12 to ensure that they continue to perform their intended function effectively, and to prevent development that would undermine this. The policy sets out that non-Class E floorspace within primary shopping areas should not comprise more than 20%. The Policy seeks to safeguard centres and

ensure they continue to offer the provide for the needs of the local communities they serve.

8.7 Policy LP31 'Development of main town centre uses outside of designated centres' sets out that proposals for main town centre uses will be subject to the sequential test, and where relevant, also the impact assessment which sets a locally specific threshold of 1,000m<sup>2</sup>. This threshold reflects the modest size of centres across the Borough; the national threshold of 2,500m2 has the potential to cause harm either individually or cumulatively by diverting trade away from centres in the Borough. This policy complements policies LP12, LP29 and LP30 by resisting development outside of centres.

# 9. Conclusions

- 9.1 The Council has established that the need for the plan period 2020/21 to 2036/37 is 68,000m<sup>2</sup> of employment floorspace.
- 9.2 The strategy comprises several different strands to ensure a comprehensive approach to employment planning in the Borough:
  - safeguarding existing Employment Areas,
  - safeguarding small business units, including adding a new employment area designation to an existing area of small business units (Wellington Business Park)
  - continued regeneration of Bracknell Town Centre
  - allocating sites for mixed-use/economic development
  - creation of a new Science and Innovation Park at Jealott's Hill, Warfield.
- 9.3 The strategy for meeting wider economic needs is:
  - Continued regeneration of Bracknell Town Centre
  - Safeguarding of existing centres
  - Mixed-use allocations in Bracknell Town and Warfield through Policy LP11.
- 9.4 The above strategy will help ensure a sustainable approach. It will also help achieve the aims and objectives of national policy and more local strategies. For example, the objectives of the Council Plan which refer to the desire to retain existing businesses and attract new companies to the Borough. This is exemplified by the proposal for a new Garden Village at Jealotts Hill which will help retain a long established company that employs a significant number of staff and create opportunities for other companies to co-locate.
- 9.5 The overall strategy will be implemented through several mechanisms. The strategic policies (set out in Chapter 5 of this paper) are complemented with a suite of development management policies (set out in Chapter 8 of this paper). Monitoring of floorspace will assist in understanding the impact of policies and the results of the annual monitoring will feed into the 5 year reviews required by the NPPF to establish whether or not the policies are effective which might influence any decision to review. They will also provide an opportunity to assess the impacts of other influences such as recovery from Covid-19 and Brexit.

# Positively prepared

9.6 The pre submission version of the Local Plan allocates 91,524m<sup>2</sup> mixed-use economic floorspace (of which 57,382m<sup>2</sup> is to be delivered in the current plan period). If the retail component is removed, the BFLP is providing 102,135m<sup>2</sup> floorspace (of which 68,685 m<sup>2</sup> is in the plan period). In order for the needs of businesses to be met and to adapt throughout the plan period, the BFLP has taken a flexible approach by generally not specifying the types of economic uses anticipated on the sites. This will enable the market to respond to changing demands over the plan period. This is consistent with the aims of the NPPF to "help create the conditions in which businesses can invest, expand and adapt" (paragraph 80), and specifically paragraph 81(d) to "be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances." It also reflects the recent approach being set out by the

Government, such as through the amended UCO. The BFLP will help ensure economic recovery from the Covid-19 pandemic and any impacts of Brexit.

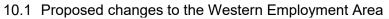
### **Justified**

- 9.7 The Council considers the employment and economic strategy (set out in Chapter 5) to be the most appropriate strategy for the Borough, being based upon proportionate evidence (set out in Chapter 3 of this paper) and better than the reasonable alternatives (see the Sustainability Appraisal for detailed consideration of alternatives). <u>Effective</u>
- 9.8 The paper has shown that mixed-use land allocations are deliverable over the plan period and are flexible enough to meet the needs of the market and businesses in the future.

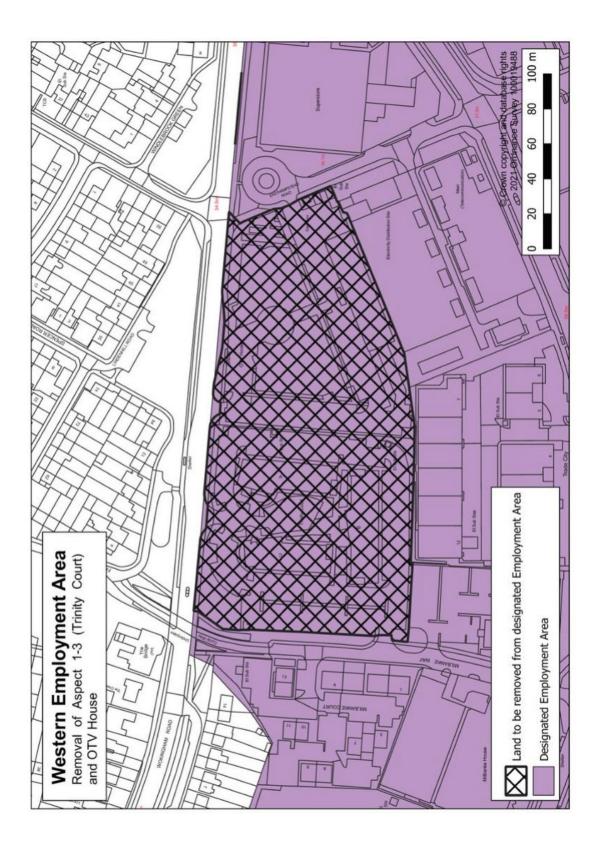
### Consistent with national policy

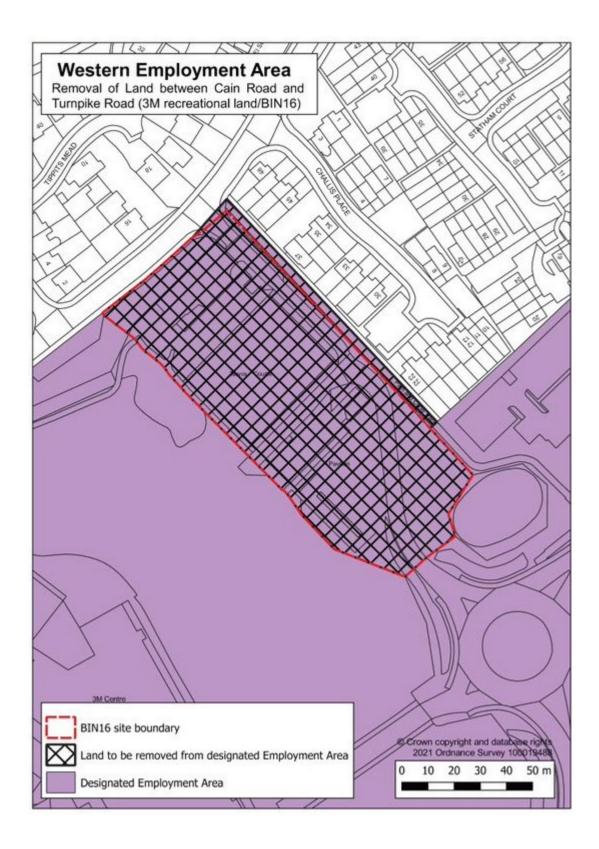
9.9 The BFLP and this paper have referred to the NPPF throughout and have demonstrated that the approach taken is clearly consistent with National Policy and guidance and enables the delivery of sustainable development.

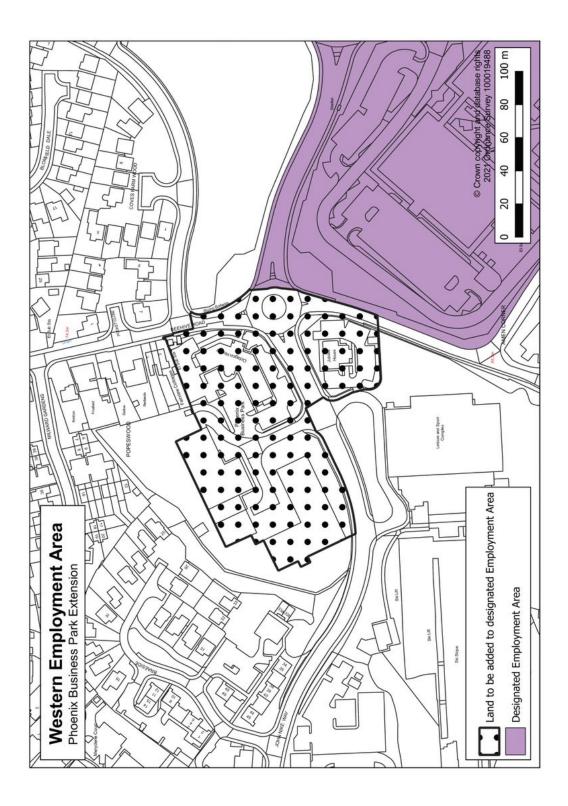
# 10. Appendix 1 Changes to the Employment Areas

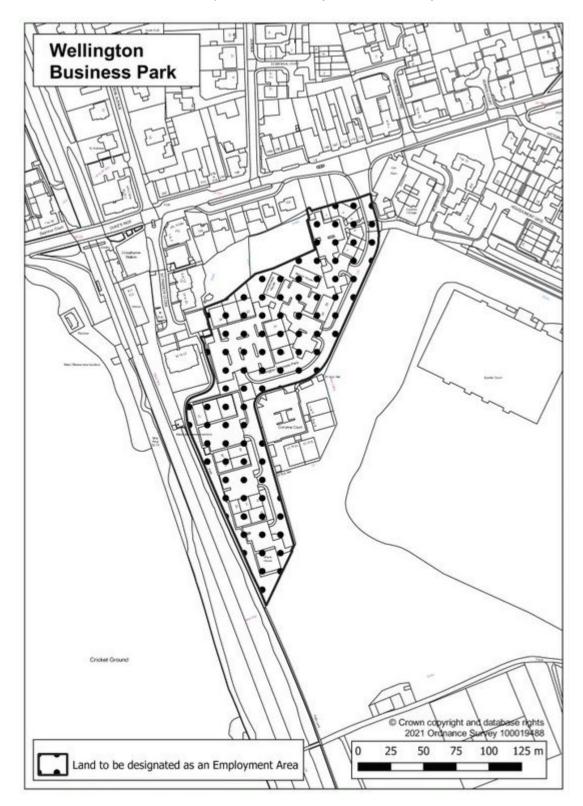




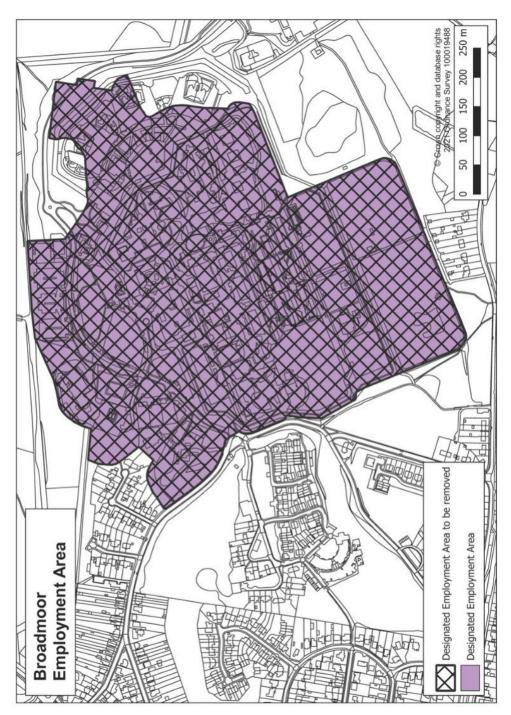








10.2 Proposed extent of new Employment Area designation at Wellington Business Park



10.3 Proposed removal of Employment Area designation at Broadmoor