

## **Development and Allocations Plan (DAP) M02-01 Day 2, Further Action 30**

At the DAP Examination hearing session on M02-1 Economic prosperity the Inspector asked if the Council had considered fully the ramifications of PPG: Paragraph: 009 Reference ID: 2b-009-20140306 with regards to CSUCP Policy CS6, in relation to DAP Policies DM1.

### **Position regarding DAP policy DM1**

The NPPF and PPG are clear that a sequential approach must be applied to plan making. This includes for the decision to allocate land for main town centre uses, such as offices.

The Council, in preparing the CSUCP and Policy CS6 carried out such a sequential approach in terms of the demand for, and availability of land to support the proposed allocations set out within the CSUCP for offices.

This process is discussed in the CSUCP Compliance Statement (EL09, pages 172-173). The assessment identified a range of office market types which cater for different operational requirements of businesses (City Centre, town centre, city fringe, business park, office park and Solus).

The Office Bridging Paper (EL32, Tables 6 & 7) reviewed available office sites and undertook a sequential assessment having regard to quantitative and qualitative office requirements.

The Office Needs Assessment 2012 (50 (SD) Table 9.4 identified 2,072 sq m of potential office floorspace available within the Industrial Estate/ Business Park segment of the office market. This was a small proportion of the overall 651,4709 sq m identified as being available city wide.

The Office Needs Assessment (50 (SD), pages 115-117) recommended that a mixed portfolio of office sites across different locations should be considered to meet these different business requirements. It considered that there was a strong case for some provision in out of town centre business parks and Solus. This was reflected in Policy CS6 point 2i, and 2ii.

Only a small proportion of office development was deemed necessary in other locations outside of the Urban Core and those sites identified in Policy CS6 2i, and 2ii.

Policy CS6 part 3 requires a sequential test for office applications outside of locations identified in CS6 part 2, which are above 200sq m (net internal area).

The justification for the point is set out in the CSUCP Compliance Paper (EL09, p173), which explains that the requirement reflected the findings of the Office Needs Assessment (2012) (paragraph 10.2.9, p88-116), and the policy criteria:

*“will minimise the extent to which office activity is displaced from town centres.”*

Development of offices of less than 200 sqm was considered to allow enough flexibility to ensure that offices with operational requirements requiring proximity to

the industrial sector as identified in table 10.1 of (50(SD) could still be developed while ensuring that developments with potential to undermine the strategic goal of focusing office development into the Urban Core was subject to an appropriate sequential test.

The Council consider that this approach is still justified and B1 Use Classes should continue to be allocated through DAP Policy DM1, and that a size threshold is still appropriate.

There have been several recent developments within the planning system which took place after the DAP evidence base was compiled, and which are of relevance.

Firstly the permitted development rights regarding B2 and B8 units have been amended (25 May 2019<sup>1</sup>). Permitted development rights now permit changes from B2 to B1 and B8 to B1 up to 500sq m. Secondly the NPPF no-longer requires that an impact test be applied to office development outside town centres.

Given these changes and considering the guidance in the PPG, the Council consider that it would be justified to include a requirement in policy DM1 for a sequential test to be carried out in support of applications proposing development of B1 office space for any development of more than 500sq m. This would align with the scale of offices that can now be developed through permitted development. As the DAP will be the more recent document the criteria in DM1 will supersede that of CS6 in terms of point 3.

With the above matters in mind the Council proposes the following further major modification:

1. Introduce a criterion to policy DM1 requiring a sequential test for office developments over 500sqm on allocated sites.

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<sup>1</sup> [https://www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use/2](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use/2)