

FURTHER COMMENT ON CONSULTATION REFERENCE DM27 OPTION FOR ED2B

I am sufficiently concerned by the proposed change to ED2B to comment further:

The whole country is experiencing high demand for industrial and warehouse property and rents have risen accordingly. Bath is not an exception.

Policy ED2A protects Bath's strategic industrial properties. That should continue and any erosion of the policy resisted.

Since 2011 planning policy has been to promote high tech, high value employment which is mainly office based, over traditional industry. This has been successful. It has also promoted residential development on brownfield sites. Stothert and Pitt, the gas works, the recycling centre are all turned to residential. The plan makes no provision for new industrial building except in Somer Valley. The managed loss of 40,000 sq m in Bath was a guesstimate, not a finite unbreakable line.

We are where we are because the local plan has brought us here.

Economic Development propose stopping economic development by effectively banning any change of use or loss of industrial within BANES but targeting Bath. They refer to significant losses of industrial land, chronic shortage of industrial space within the Bath City area, and 'a critical issue making the protection of existing industrial sites essential'. This is based on the findings of the Employment Growth and Employment Land Review 2020.

This report compares the rate of industrial employment growth in the World Heritage Site of Bath, (a steep sided valley surrounded by green belt) which is largely built out, with the South West and UK as a whole. The inevitable but erroneous conclusion is that Bath needs about 45,000 square metres of new warehouse and industrial space and 50% increase in office floorspace.

45,000 sq m of new build at 50% site cover will require 9 ha or 22.5 acres. That is half of the Western Riverside site including land fronting the Lower Bristol Road and land on the north side of the river. It is a nonsensical conclusion and as such it is not a report on which to base a ban on change of use of non-strategic industrial sites.

The City's new economic development opportunities come from redevelopment of non-strategic industrial and warehouse sites. Without them the annual flow of tens of millions of pounds that are poured into the economic redevelopment of old and underutilised sites will cease.

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