

My name is Derek Walker and I am a Chartered Surveyor dealing with commercial property agency and valuation in BANES since 1974. A substantial part of my work is with industrial and warehouse properties.

The consultation draft new policy for ED.2B – non-strategic industrial sites - will turn policy on its head by making the applicant prove that such property should not be retained for industrial use.

I object on the following grounds:

1. The proposed policy is intrinsically weak as it assumes that every single industrial/storage property throughout BANES is worth protecting which is patently not the case.

2. It mentions industrial property. Is it not intended to cover warehouse premises as well?

3. National planning policy is to free up changes of use to encourage housing and flexibility/reuse of commercial property. The new draft policy is diametrically opposed to this national policy and therefore open to criticism.

4. It demands of each applicant that they prove a negative, something that it is very difficult to do. As such it is effectively a blanket ban on change from industrial/warehouse. This is a poor tool in planning. Bath's shortage of modern offices is the result partly of a moratorium on new office development in the late 1980's boom.

5. Investment in new building in the city in the last 20 years has been huge. We owe this almost entirely to reuse of outdated and redundant industrial and warehouse premises. Hundreds of millions of pounds have been invested to improve the economy of Bath and BANES. Is this being overlooked? If they had all been "saved" the city would be stuck in a time warp and resemble a backward outpost of civilisation.

6. Bath is not suited to new large industrial sites or buildings. Its attractions of historic core, tight boundaries and green belt surround mean it has to concentrate on high value uses. Employment comes from retail, tourism, office jobs and teaching in two good universities. It is not going to come from an outside firm moving into a new factory or warehouse or from the retention of outdated factories or warehouses.

7. Throughout the consultation reference is made to a chronic or critical shortage of industrial space. The draft policy states that there is a critical shortage of industrial space in Bath and other areas. This is not the case in much of BANES and is a subjective assessment. There is no evidence of the economy suffering from this perceived shortage. There are several industrial and warehouse properties in Bath that have been on the market in a genuine attempt to find tenants for over a year.

8. I consider the present policy to be sufficient. The protected strategic sites allow Bath's warehousing, trade counter and manufacturing to function. The non-strategic sites are tomorrow's potential development sites.

9. The policy wording is woolly and hard to understand. Applicants for change of use should not have to spend thousands of pounds on employing professional planners, surveyors and economists to prove the subjective parameters to justify change of use.

Consultation ref:

Paragraph 2.98 proposes council-led research into the important role of industrial sites of strong neighbourhood importance. In its use of words it pre-judges the situation. Money can be better spent.

At 2.100 the assertion is made that there is a chronic shortage of industrial space in the Bath City area. This is not surprising in a world heritage site that relies on other sectors for its employment and on old industrial sites for its continuing development. The ongoing presence of industrial space within the city, described as essential to a functioning ecosystem, is adequately supported by the already well protected strategic sites.

My view of the background to, and possible explanation for the proposed policy:

In the late 1990's and early 2000's a realisation grew among agents and the Economic Development department of BANES (Econ Dev.) that large industrial properties were being lost to residential use as they became redundant. We joined with Econ Dev. officers to object to purely residential schemes and had success with the Clarks shoe factory at Odd Down which was refused residential development on appeal, resulting in a mixed scheme including offices. The approach was followed up on other similar applications with Econ Dev. objecting to each purely residential scheme.

The new Local Plan of 2011 introduced the policy of a planned reduction in industrial and warehouse accommodation in BANES, recognising the shift from blue collar to office based working. Bath was more suited to office employment and had seen new office businesses making the city home, attracted by the beautiful environment.

This planned reduction put paid to any effective Econ Dev. objections to loss of industrial/warehouse space and over the past ten years they have become frustrated at this impotency, leading to calls for surveys and reports supporting a rethink of the economic development policies.

The report "Employment Growth and Employment Land Review" March 2020 is the latest. It asks what growth there should be in office and industrial space over the plan period and arrives at these figures by reference to growth in the South West and UK as a whole. After allowances for churn, renewal by occupiers and other factors it concluded that Bath needs about 45,000 sq m of new warehouse and industrial (this will take 9ha or 22.5acres of land) and 50% increase in office floor space.

Bath is a historic city and World Heritage Site. Apart from the green spaces that are needed to maintain its environment and WH status it is largely built out. What space that does lend itself to development is designated in the Placemaking plan for housing or offices. While the plan says that it provides space for new employment in Bath it does not provide for industrial employment. It just preserves the Strategic Industrial Estates and marks some riverside parts out for mixed development. Huge areas of derelict or underutilized land on Western Riverside are shown for residential.

This is not surprising as the council has a shortfall of 7,000 residential units and is being pressed by central government to make adequate provision for their delivery.

In Bath the Placemaking Plan proposes 60,000 sq m of new offices. With North and South Quays developments it is well on its way to achieving this. It does not propose any new industrial that I can see. This is because, after allowing for housing and offices there is no space left. The Employment Land Review proposes 34,000 – 56,000 square metres of industrial is needed in Bath. This is not possible and as such cannot be taken seriously.

The Core Strategy and Placemaking plan say “B&NES will aim to build on its considerable strengths and pursue a smart growth agenda, i.e. promotion of a higher value added economy rather than relying only on volume growth.” And:

*Whilst there are significant development opportunities within the city, there is not enough land in the city to meet the land use demands that have been identified by the evidence. This is because Bath is a small city with relatively few development sites. ... The Council has therefore had to prioritise land uses for the limited land available. It has agreed that it will plan to meet its housing numbers and employment floor space in full; as well as the growth in hotel demand projected in evidence supporting the Core Strategy; and will accept that there is a shortfall in meeting the retail capacity identified for the whole plan period.*

The employment floor space in the Placemaking Plan 2017 has been designated as office space of 60,000 square metres, in line with policy to grow high value jobs in preference to low density or lower value industry or warehousing.

This is in contrast to the later Employment Land Review 2020 approach and conclusions which demand huge increase in industrial provision. I say this only to make the point that the Review makes this dubious recommendation as well as bemoaning the ‘chronic’ and ‘critical’ lack of industrial space that is apparently leading to problems with Bath remaining a fully functioning economy. The perceived threats from shortage are, in my opinion, not demonstrated and are sufficiently safeguarded by the Strategic Employment sites identified in Policy ED.2A.

The present policies of ED.2A and ED.2B are sufficient to secure Bath’s future. The established industrial estates and best offices are protected from change of use. For the remainder, the “non-strategic” sites/buildings, there is a presumption in favour of development with residential use provided it will not lead to a strong economic loss to the area.

For an economic loss to BANES to be strong the case has to be obvious, or it is not strong. My examples would include the MOD moving from the city. As it turns out the city has survived this event and others have filled the employment gaps. There are no industrial or warehouse examples that come to mind. No manufacturing business is large enough to provoke a strong economic loss. We have nothing like Westland Helicopters in Yeovil or a Honda factory in Swindon to worry about.

Econ Dev. are concerned with the constant drip of losses. These are the result of our local and national planning policies, a move to new clean employment and of warehousing moving to purpose built estates with first class communications. The Core Strategy prioritises the redevelopment of brownfield sites for housing within the urban areas, and especially within Bath. Brownfield sites have been identified capable of delivering around 1,000 dwellings during the plan period. No wonder there is less industrial space.

They propose strengthening Local Plan policy with a blanket ban on change of use of non-strategic industrial and warehouse premises as each represents a strong economic loss to the area. This is patently not true.

New industrial and warehouse provision in Bath would be assisted by the Council offering sites for development. It has a few unused or underutilised sites, some within the protected areas and these should be marketed on long lease. Some Council owned sites currently marked for residential could be re-designated for business use if the new Local Plan concludes that a shortage of industrial and warehouse units is truly critical to the City's future economic wellbeing. Furthermore, if it is considered truly critical then it may represent sufficient extraordinary circumstances to warrant change to the green belt boundary to the west of the city or retention of industrial in Western Riverside, where it belongs.

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