

Edenfield Community Neighbourhood Forum

Employment Land Review

29th August 2019.

Hope View Market Street Edenfield



Edenfield Community Neighbourhood Forum

Employment Land Review

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Appendix ECNF – ELR 1

Overview

1) Inaccuracy in the Employment Site Allocations List.

In the Local Plan Submission Version Written Statement, March 2019, (“the Local Plan”) there are significant inaccuracies in the Employment Site Allocations List (Table 2, pages 51-53).

Appendix ECNF – ELR 2 Table A. Shows 12 examples of sites omitted, some of many years’ standing. They constitute over 6ha of Employment Land in addition to the totals in Table 2. These examples are drawn from local knowledge; it is very likely there are many more.

Appendix ECNF – ELR 2 Table B. Shows two examples of discrepancies in the estimated net developable areas. It is therefore likely there is a significant amount of developable land on other sites recorded as having zero developable land.

Appendix ECNF – ELR 2 Table C. The omission of a figure for the net developable area at Futures Park means the total net developable area is understated by approximately 2.8ha (approximately 10% of the total.)

Appendix ECNF – ELR 2 Table D. Provides six examples of Small Employment Sites which are not listed. Presumably, as with Tables A and B above, there are many more, providing valuable employment space.

The cumulative effect is that there is a minimum of 6ha, increasing the existing employment land total to 160.78ha. Additionally, there are 2.8ha of net developable land not included, taking the total for this to 30.77ha. The new employment land allocation figure should be at least $160.78 + 23.01$ from New Employment + 8.23 from Mixed Sites = 192.02 ha. **(See data in RBC SD001 Policy EMP 2 Table 2 pages 51-53 and Appendix ECNF – ELR 2.)**

2) Rossendale Employment Projections 2014-2034.

The latest Employment projections in the Employment Land Topic Paper highlight a further reduction in manufacturing jobs of 119. Updated to reflect this change, the Floorspace requirement is reduced from 5,432sqm to 2,755sqm. When this is then subjected to the Plot Ratio calculations, the gross land requirement figure is reduced from 1.36ha to 0.69ha. **Refer to Appendix ECNF - ELR 3 for the Employment projection figures and Appendix ECNF – ELR 4 for the space calculation details.**

3) Comments on Calculation Methodology. (See Litchfields Employment Land Review Final Report, 17.02.17.)

- a) **Employment Projections:** Due to the contraction projected for manufacturing and the trend to service-orientated businesses the space requirements from the employment projection itself will be 0.69ha over the plan period. It should be noted that increases in job growth would make no significant difference to the employment land requirement. **(See Appendices ECNF - ELR 3 & 4.)**
- b) **Safety Margin:** There is no reason to change the 2-year safety margin assumption; however, the area involved should be based on the average from the ten-year completion figures. (These equate to 0.39ha per annum giving a total requirement of 0.78ha.) **(See the Completions Calculations in Appendix ECNF - ELR 5.)**
- c) **Land Loss Allowance:** The background is fully reviewed in **Appendix ECNF - ELR 6** point 4.0. On this basis the average 10 year loss figure should be multiplied by the number of years of the Local Plan. (0.617ha x 15 = 9.25ha.)
- d) **Corrected Employment Land Requirement.** The final Employment Land requirement is made up from points 3a, 3b and 3c above: $0.69 + 0.78 + 9.25\text{ha} = 10.72\text{ha}$, not the 27ha in the Local Plan.
- e) **Employment Land Allocated.** The Local Plan identified 27.97ha of developable land. With the 2.8ha of additional developable land highlighted in **Appendix ECNF - ELR 2, section C**, the total increases to 30.77ha. When this is compared with the recalculated requirement figure in paragraph 3d above, there is a surplus of employment land available of 20.05ha.
- f) **RBC's Policies. See Appendix ECNF - ELR 7** These policies will significantly reduce the employment land requirement by reducing the annual land losses which in turn should allow for more of the previously developed land to be allocated for housing. This eliminates the need to take any land from the Green Belt for housing.

Conclusion.

RBC has a wonderful opportunity to regenerate the less developed areas by planning to replace old factories with better-located modern units.

With the recalculation of the requirements based on the most recent figures and the proposed policies EMP3, EMP4 and EMP5, the surplus of employment land will enable the sites that are less suited to employment use to be used for housing. If 50% of the surplus Employment Land were to be used for housing this would provide 439 dwellings based on the current density figures being achieved on Brownfield sites. This will also enable RBC to eliminate the use of Green Belt for Housing and Employment in the present proposals and in the future.

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Appendix ECNF - ELR 2

Employment Site Analysis.

A) Source: Examination of Updated Brownfield and Mixed Sites in the SHLAA (2018 update not yet published) 26.06.18 and Local Knowledge.

SHLAA/ Local Knowledge	Address	Land Type	G/N ha	Comments
16009	Rear of 303-321 Market Street, Whitworth.	U.B.	0.3/0.3	Owner applied for change of use from garage and haulage to the manufacture of timber fencing products. Not on Employment Site Allocation List. March 2019.
16082	Anvil Street, Bacup.	U.B.	0.19/0.19	Owner expressed interest to maintain it for Employment. Not on Employment Site Allocation List. March 2019.
16130 EMP 30	Mill End Mill, Waterfoot.	U.B.	1.28/0.9	Not deemed to be suitable for Residential, but not on Employment Site Allocation List. March 2019.
16154	Vacant Haulage Yard, Burnley Road East, Water.	Br. In C.	0.2/0.19	Not suitable for housing, was previously an Employment Site, should be retained for employment. Needs to be added to Employment Site Allocation List.
16275	Adj Hardsough Lane, Edenfield.	Br. in G.B.	1.93/0.92	Housing rejected. Used for Caravan Storage. Needs to be added to Employment Site Allocation List.
Local Knowledge	New Bowness Mills- North & South sides of Shaw Clough Rd + Bowness Mill Units 1-3 + Shaw Clough Mill + Garage.	U.B.	Estimate 0.2	All of these need to be made into one Site and added to Employment Site Allocation List.
Local Knowledge	Truss Form Site. Hollin Bridge, Burnley Road East, Waterfoot + Mount Spring Works, Hollin Bridge, Waterfoot.	U.B.	Estimate 0.8	Needs to be added to Employment Site Allocation List.
Local Knowledge	Chatterton Mill, Chatterton Road, Stubbins.	In G.B.	Estimate 0.45	Owned by Tunstead Needlefelt Company. Needs to be added to Employment Site Allocation List.

Local Knowledge	Lancashire Sock & Greenway Units 1-3, New Line, Bacup.	U.B.	Estimate 0.9	Needs to be added to Employment Site Allocation List.
Local Knowledge	LCC Highways Depot. Futures Park. Bacup.	U.B.	Estimate 0.4	Needs to be added to Employment Site Allocation List.
Local Knowledge	Valmet. Manchester Road, Haslingden.	U.B.	Estimate 0.7	Needs to be added to Employment Site Allocation List.
Local Knowledge	Hargreaves Street, Elm Close, Chapel Street, Haslingden.	U.B.	Estimate 0.5	Needs to be added to Employment Site Allocation List.
Total	Twelve Sites.		Est. 6.45ha	The additional total employment area involved is in excess of 6ha.
B) Examples of New Employment Units built on existing sites showing zero net development. Source Planning Approval records.				
2018/0543 EE14	Warton Metals, Grove Mill, Commerce St, Haslingden	U.B.	.626/.626	Erection of new unit for B1, B2 & B8 use.
2019/0064 EE31	Brandwood Road, Stacksteads	U.B.	.113/.113	Erection of two Commercial Buildings for B8 storage.
Total	Expansion on two existing sites recorded to have no net developable area available.		0.739ha	There is a very strong possibility that there is a significant amount of developable land on other sites recorded with zero developable land.
C) Example of New Employment Units to be built on existing sites with an asterisk rather than a figure for net developable area. Source: Planning Approval records.				
2019/0102 M4	Futures Park, Bacup	U.B.	2.8ha	Two development sites one of which is already approved.
TOTAL	Plans approved provide for two business opportunities.		2.8ha	This would be considered to be land available for new development; however RBC failed to put a figure in the appropriate column.
D) Examples of Small Sites which appear to have been ignored. Source: Local Knowledge.				
Local Knowledge	New Line Bodies. New Line, Bacup.	U.B.	Estimate 0.06	Needs to be added to Employment Site Allocation List.
Local Knowledge	Angels in Stone. Bolton Road North, Stubbins.	U.B.	Estimate 0.02	Needs to be added to Employment Site Allocation List.

Local Knowledge	Height Barn Mill, Height Barn Lane, New Line. Bacup.	U.B.	Estimate 0.05	Needs to be added to Employment Site Allocation List.
Local Knowledge	T. C. Components. Hall Street / Back Lee Street, Haslingden	U.B.	0.01	Needs to be added to Employment Site Allocation List.
Local Knowledge	Worthington Joinery Workshop. Bamford Road, Ramsbottom.	G.B.	0.03	Needs to be added to Employment Site Allocation List.
Local Knowledge	Mainland Catering Equipment. Rakefoot, Haslingden.	U.B.	0.12	Needs to be added to Employment Site Allocation List.
Total	Six Small Sites Ignored.		Estimate 0.29ha	These are examples of small sites; it is considered there are many more such sites throughout the Borough, including numerous motor repair workshops.

Key: U.B. – Urban Boundary; Br. - Brownfield; G.B. – Green Belt; & C. – Countryside.

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Appendix ECNF - ELR 3

Rossendale Employment Projections for 2014-2034.

Table 3a. Source: Rossendale Employment Land review. Final Report prepared by Lichfields dated 17.02.17, Page 65. Table reference 9.3 Title Forecast Workforce Change in Rossendale 2014-2034.

Table 3a Reference 9.3	Rossendale Workforce Jobs		Change 2014-2034
	2014	2034	
Offices (B1a/b)	3206	3517	+311
Manufacturing (B1/B2)	5799	5182	-617
Distribution (B8)	2317	2502	+185
Total B Class Jobs	11322	11200	-121
Other Non B Class Jobs	13478	15400	+1921
Jobs in all Sectors.	24800	26600	+1800

Table 3b Source: RBC's Employment Land Topic Paper dated March 2019. Table 1 from Section 3.14.

Sector	Employment Space	1997	2015	2034	Change
		Number of Jobs			
Construction	N/A	1564	1670	1760	+90
Education	D1	1042	2490	2795	+305
Health & Social Care	D1/C2	2189	3230	4140	+910
ICT	B1(a)/B8/Sui Generis	313	311	311	0
Leisure & Recreation	A3/C1/D2/Sui Generis	1042	1763	2174	+411
Manufacturing	B1(c)/B2	9278	5083	4347	-736
Public Sector Admin	B1(a)/A1	417	311	311	0
Retail & Wholesale	A1/B8/Sui Generis	4483	4357	4761	+404
Services	B1 (a)/A2	5108	4564	4761	+197
Transport	B8	1355	830	932	+102
RBC's Total		27000	25000	26600	1600
Correct Totals		26791	24609	26292	1683

Comments: The latest data in table 3b indicates the manufacturing job losses will increase to 736 from the 617 in table 3a resulting in a loss of 119 additional jobs. Owing to the different groupings of the individual classifications between the two tables we have assumed that the increase in Office jobs (B1a/b) will remain at 311 and the Distribution jobs(B8) will remain at 185. The effect of the manufacturing job losses is a reduction in terms of land requirement of 2677.5sqm. **(Refer to Appendix ECNF – ELR 4 for calculation data.)**

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Appendix ECNF - ELR 4

Lichfield Land Calculations. Refer to the Rossendale Employment Land Review by Lichfields dated 17.02.17 Table 9.4 page 67.

<u>Sector</u>	<u>Numbers</u>	<u>Space Req.</u> <u>Sqm</u>	<u>Sub Tot</u> <u>Sqm</u>	<u>Vacancy</u> <u>Factor</u>	<u>Adj Sub</u> <u>Total</u>	<u>Change</u>	<u>Factor**</u>	<u>Totals SqM</u>	<u>Gross Land Requirement.</u>	
									SqM	Hectares.
Office. Jobs 2014	3206	12.5	40075	16%	47708					
Office. Jobs 2034	3517	12.5	43962.5	10%	48847	1139		1139		
Manufacturing. 2014	5799	45	260955	N/A	260955					
Manufacturing. 2034	5182	45	233190	N/A	233190	-27765	50%	-13883		
Warehouse/Distribution.2014	2317	69.5	161031.5	8%	175034					
Warehouse/Distribution.2034	2502	69.5	173889	10%	193210	18176		18176		
Nett Employment Floorspace Requirement.								<u>5432.5</u>		

Calculation to determine reduction in space requirement based on further reduction in manufacturing jobs. Refer to Appendix ECNF - ELR 3 for data.

119	45	5355	5355	-5355	50%	-2677.5
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Updated Nett Employment Floorspace Requirement.

2755

Factor** This was the factor used by Lichfield to relate Factory space losses to job losses.

Plot Ratio* To calculate the Gross Land requirement Lichfields have used a PR Factor of 40%.

Original Lichfield Calculation above of 5432.5 SqM.

<u>5432.5</u>	40%	13581	<u>1.36</u>
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Area figure adjusted for increased job losses

<u>2755</u>	40%	6888	<u>0.69</u>
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(*Refer to Lichfields' ELR Final Report dated 17.02.17, Page 73 Section 9.45.)

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Appendix ECNF - ELR 5

Employment land development completion data in Hectares.

<u>Period</u>	<u>Office (B1a)</u>	<u>Industrial (B1c +B2)</u>	<u>Warehouse (B8)</u>	<u>Total</u>
2008/9	0.18	0.04	0.68	0.9
2009/10	0.12	0.03	0.42	0.57
2010/11	0.76	0	0	0.76
2011/12	0	0.27	0	0.27
2012/13	0.15	0.35	0.39	0.89
2013/4	0.063	0.198	0.0596	0.3206
2014/15	0	0	0.024	0.024
2015/16	0.006	0	0	0.006
2016/17	0	0.0264	0	0.0264
2017/18	0.0524	0.0761	0	0.1285
Totals (10 years.)	1.3314	0.9905	1.5736	3.8955
Percentage	34%	25%	40%	
Annual Average	0.133	0.099	0.157	0.390

Source: 2008/9 -2012/13.

(Lichfields' ELR, Final Report dated 17.02.17. Page 36 Table 5.1.)

Source : 2013/14 - 2017/18.

(Employment Land Topic Paper. March 2019. Section 3.5.1 Table 3.)

Source: 2018/9 Completions Table in MIQ's From RBC Matter 5 dated 07.08.19.

Refer to ECNF - ELR 5B for updated calculations giving 0.33 ha per annum over 10 years.

Updated Completions Figures from 2009/10 to 2018/9.

<u>Period</u>	<u>Office B1a.</u>	<u>Industrial (B1c +B2)</u>	<u>Warehousing B8.</u>	<u>Totals</u>	<u>Source.</u>
2009/10	0.12	0.03	0.42	0.57	Litchfield 17.02.17
2010/11	0.76	0	0	0.76	Ditto.
2011/12	0	0.27	0	0.27	Ditto.
2012/13	0.15	0.35	0.39	0.89	Ditto.
2013/4	0.063	0.198	0.0596	0.3206	Employment Land Topic Paper.
2014/15	0	0	0.024	0.024	Ditto.
2015/16	0.006	0	0	0.006	Ditto.
2016/17	0	0.0264	0	0.0264	Ditto.
2017/18	0.0524	0.0761	0	0.1285	Ditto.
2018/9		0.207	0.1246	0.3316	RBC Response to Matter 5 - 07.08.19.
Ten Yr. Total	1.1514	1.1575	1.0182	3.3271	

Losses of Employment Space in Rossendale from 2008/9 to 2017/18 in ha.

<u>Period</u>	<u>Office (B1a)</u>	<u>Industrial (B1c +B2)</u>	<u>Warehouse (B8)</u>	<u>Total</u>	<u>Gains</u>	<u>Net Loss</u>
2008/9	0	0	0.1	0.1		
2009/10	0.1	0.1	0.8	1		
2010/11	0	0	0	0	0.31	
2011/12	0.002	0.002	0.002	0.005		
2012/13	0.867	0.867	0.867	2.6		
2013/4	0	0	0	0	1.07	
2014/15	1.626	0	1.545	3.171		
2015/16	0	0	0	0.1		
2016/17	0	0	0		0.03	
2017/18	0	0	0	0.6		
Totals (10 years.)	2.595	0.969	3.314	7.576	1.41	6.166

Net loss for ten years = 6.166ha, equates to 0.617ha per year.

For a twenty year Plan this should be 12.33 ha and for the Local Plan period of fifteen years 9.25ha.

Ten year period selected as data covering any gains in the 3 years prior to 2008/9 is not available.

Source:2008/9-2009/10.

(Lichfields' ELR Final Report dated 17.02.17. Page 37 Table 5.2.)

Source: 2010/11-2017/8.

(RBC's Annual/Authority Monitoring Reports From 2010/11-2017/18.)

Percentage 34.6 34.8 30.6

Ten Year Annual Completion is 0.33ha.

Period	Total
2014/5	0.024
2015/6	0.006
2016/7	0.0264
2017/8	0.1285
2018/9	0.3316
Total	0.5165

Five Year Annual Completion is 0.1033ha

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Appendix ECNF - ELR 6

Comments on Land Requirement Calculation Methodology Used by Lichfields.

- 1) **Number of Jobs.** The Land requirement calculation for the plan period is based on the projected employment level changes; therefore it is important that we use the most up-to-date figures available. **(See Appendix ECNF - ELR 3 for the projected Employment figures.)** If this figure is adopted the net land requirements reduce from 5,456sqm to 2,755sqm. The same applies to the gross land requirement which reduces from 1.36ha to 0.69ha. **(See Appendix ECNF - ELR 4 for the calculations.)**
- 2) **Period.** The figures are based on a twenty year period from 2014 to 2034 not the 15 years of the Local Plan.
- 3) **Plot Ratio.** The calculation method used to arrive at a Gross Land requirement from the adjusted net figure in paragraph 1 above is based on a Plot Ratio of 40% for all categories. This takes the original figure 5,456sqm to 13,640sqm and the adjusted requirement from 2,755sqm to 6,888sqm for the twenty year period. (Note: the Plot Ratio figure of 40% is acceptable for Office and Manufacturing categories but for the larger buildings for Warehousing/Distribution a lower figure should be used.) **(See Appendix ECNF - ELR 4 for calculations and item 1 in Appendix ECNF - ELR 6.)**
- 4) **Land Loss Allowances.** The total figure for land losses over the ten-year period from 2008/9 to 2017/8 was 7.576ha. **(Source: Table 5.2 on page 37 in the Lichfields ELR dated 17.02.17 for 2008/9-2009/10 and the Annual/Authority Monitoring Reports from 2010/11 to 2017/18.)** The figures cover the losses but there are also gains during this period which have been ignored. The details of the gains are clearly stated in the AMRs, they equate to 1.41ha since 2010/11 bringing the net land losses down to 6.166ha over the past ten years. **(See Appendix ECNF - ELR 5 for the relevant figures.)** For comparison and in support of this figure it should be noted in **Appendix ECNF – ELR 5** that the Gross Employment Completions in Rossendale average 0.39ha per annum, some 0.227ha less than the perceived land losses.

Lichfields' ELR Final Report, 17.02.17 (Page 77, Section 9.67) takes 20 years using the 1.35ha figure, giving a total of 27ha for land losses.

If the ten-year average annual land loss allowance figure is used for the Local Plan period of 2019-2034 then the total allowance required would be 9.25ha, not 27ha.

Additional comment: Employment Land that is re-used for retail parks is included within the Employment Land Loss classification, good examples being the Morrison Supermarket in Bacup and the extensive developments at New Hall Hey. Our view is that these should not be considered as Land losses; they are following predicted job growth patterns and creating significant levels of employment.

- 5) **Safety Margin.** To calculate the final figure a safety margin of two years has then been added, but the figure used for this was the 0.99ha from the 2005/6 to 2015/16 completions annual average. Note the updated Completions figure is 0.39ha per annum and therefore a more accurate Safety Margin figure would be 0.78ha for two years. **(See Lichfields' ELR Final Report, 17.02.17. Page 76 Section 9.60 Table 9.15 and Appendix ECNF - ELR 5 for up-to-date Completions data.)**
- 6) **Past Performance.** In **Tables 9.13 and 9.14** on page 74 of Lichfields' ELR Final Report, the past completion rate for the eleven-year period from 2005/6 to 2015/6 averages 0.99ha per annum for Classes B1/B2/B8. The ten year average land loss rate has reduced from 1.48ha per annum in 2005/6–2014/5 to 0.76 in 2008/9-2017/8 without including any gains. If we examine the more up-to-date information and take the last ten years as our range (2008/9-2017/8.) then the average annual completion rate is 0.39ha. **(See the Completions Table 3 in Appendix ECNF - ELR 5.)**
- 7) **Multiple Site Operators.** Lichfields' Report refers to the existing multiple site operators, primarily JJ Ormerod's and Solomon's and their aspiration to exit their smaller sites and move to larger ones to reap the benefits of scale. Whilst this will be an extremely challenging target for RBC it should be noted that if they are successful their existing employment areas will become available for future employment use.
- 8) **Overall Comments:**
- a) **Employment Projections:** Due to the contraction projected for manufacturing and the trend to service-orientated businesses the space requirements from the employment projection itself will be 0.69ha over the plan period. **(See point 1 above.)**
 - b) **Safety Margin:** There is no reason to change the safety margin assumption from the original two-year period; however, the area involved should be based on the average from the ten-year completion figures. (This equates to 0.39ha per annum giving a total requirement of 0.78ha.) **(See point 5 above.)**
 - c) **Land Loss Allowance:** We should take the annual average ten-year loss figure and multiply it by the number of years of the plan. (This equates to 0.617ha by 15 years resulting in a figure of 9.25ha: **see point 4 above.**)
 - d) The final Employment Land requirement figure includes the totals from points a - 0.69ha, b - 0.78ha and c - 9.25ha giving 10.72ha, not the 27ha in Lichfields' Report and RBC's Employment Site Allocations in the Local Plan.
 - e) RBC has already allocated 27.97ha in their plan plus the additional developable land (2.8ha) highlighted in **Appendix ECNF -ELR 2 section C** giving a total of 30.77ha - resulting in a surplus of 20.05ha of developable employment land.

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Appendix ECNF - ELR 7

RBC Policies

The Local Plan introduces new policies to enable land not specifically identified for Employment to be used for this purpose and to protect employment land from being used for other purposes.

These are principally policies EMP 3, EMP4 and EMP5.

EMP 3 Pages 54-56. Intended to safeguard employment land from use for other purposes. (Will reduce future employment land losses even further.)

EMP 4 Pages 56-57. Provides support for new employment-generating development, including extensions to existing premises, which provides for or assists with the creation of new employment opportunities, inward investment and/or secures the retention of existing employment within the Borough. (Will enable additional land not identified for employment purposes to be used.)

EMP 5 Pages 57-58. New small scale employment development (Use Classes B1, B2, B8, and A2 (A2 limited to under 100m² of new floorspace)), will be permitted in areas where employment is not the principal land use provided there would be no detriment to the amenity of the area in terms of scale, character, noise, nuisance, disturbance, environment and car parking. (Will enable additional land not identified for employment purposes to be used.)

Comments:

Assuming these policies are introduced despite the declining trend in recent years of Employment land being used for other purposes, it is likely that there will be no need, or a much reduced need, for a Land Loss Allowance, which is the major provision in the employment land calculations. On this basis the requirement for Employment land, inclusive of safety margin, would be reduced to a figure close to 1.47ha (0.69ha + 0.78ha, **see Appendix ECNF - ELR 6, points 3a & 3b**) for the entire plan period.

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