

Previous Representations/Comment ID references:

- Regulation 19 Representations: - Comment ID pslp171/1159: Proposed Submission Local Plan: Strategy and sites 2017 - Part 1: Policies > 4.0 Policies > Policy E2: Locations of new employment floorspace > Policy E2
- Regulation 19 Representations: - Comment ID pslp171/1160: Proposed Submission Local Plan: strategy and sites 2017 - Part 1: Policies > 4.0 Policies > Policy E4: Surrey Research Park > Policy E4

Brief Examination Statement in Response to Matter 7. Meeting Employment Needs (12th June) on behalf of BOC

Response to Inspector's questions:

7.1 Does the plan provide for an appropriate amount of land and floorspace for business purposes, and is the plan effective in its approach to new employment development? (See also Item 28 of my Initial Questions.)

7.2 Is the plan justified in the extent to which it protects employment land and floorspace?

Introduction

Our written representations concerned the soundness of the plan with respect to policies E2 and E4. Specifically BOC's concerns, as a current and long term occupier at the Surrey Research Park (SRP), were that these policies were not positively prepared, justified, effective or consistent with National Policy.

Policy E2

Policy E2: locations of new employment floorspace, as currently worded, would require any site-wide employment redevelopment proposals for existing Sites within the SRP, or their extension, to meet the sequential test requiring the consideration of town centre and transport interchange sites.

BOC is concerned that this policy could unnecessarily restrict the expansion and investment plans of those businesses already located on the SRP. Such sites benefit from an allocation within the proposed Strategic Employment Site under draft policy E2 so should not be required to justify expansion/redevelopment through a sequential assessment. This would be contrary to the NPPF, notably the following objectives:

1. *'Building a strong, competitive economy'* is a key policy objective as the commitment to *'securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths'* (para 18);
2. *'Planning should operate to encourage and not act as an impediment to sustainable growth'*. (Para. 19);

Respondent: BOC Limited (Glen Jenkins)

Agent: Savills (Andrew Fido)

3. *Investment in business should not be ‘over-burdened by the combined requirements of planning policy expectations’ (para. 21); and,*

4. *Local planning authorities are expected to: ‘support existing business sectors, taking account of whether they are expanding or contracting’, whilst ensuring that policies are ‘flexible enough to accommodate needs not anticipated in the plan and to allow for a rapid response to changes in economic circumstances’ (para. 21, bullet point 3).*

Policy E4

Part 1 of policy E4 seeks to restrict the existing SRP and the proposed extension detailed in Policy A26 to: *‘business use comprising offices, research, development, design and innovation activities, in any science, including social science, falling within Use Classes B1 (a), (b) and (c) of the Town and Country Planning (use Classes) Order 1987 (as amended), that is complementary to the activities of the University of Surrey’*. Whilst BOC is supportive of the overall policy objectives and broad thrust of this policy, there is concern that the restriction of business uses to those *‘in any science...that is complementary to the activities of the University of Surrey’* is potentially overly restrictive and inflexible and would again be contrary to the NPPF objectives outlined above.

This is considered to particularly be the case for those businesses operating in the existing SRP, some of which have been in place for a number of years and which require the flexibility to amend or expand their operations in response to particular corporate or industry requirements.

Whilst the flexibility provided by criterion (3) is supported, it is considered that the policy would benefit from some further amendment to be more reflective of the differences between the needs of existing established businesses operating from the SRP, and the new businesses which would be attracted to the SRP extension.

BOC therefore requested that Policy E4 is simplified and amended such that the policy deals solely with the extension to SRP as shown in policy A26, with restrictive provisions on new businesses uses within this area as appropriate. This would allow the existing businesses on the existing SRP to be governed by policies E1 and E2, with a less onerous restriction to general B1 uses, particularly head office functions.

Inspector’s questions and comments

BOC note that the Inspector’s questions and comments (No.1) dated 23 March 2018 has responded as follows at paragraphs 28 and 29:

28. Policy E2(1): having established these locations as key office and R&D sites, it is not appropriate to differentiate sequentially between them. If a requirement for additional floorspace arose from an operator at a strategic employment site, it would not be appropriate to “direct” the requirement to Guildford Town Centre or a transport interchange. This is not an effective policy and this element should be deleted. In addition, E2(3) places an unacceptable impediment to the expansion of business and enterprise. The resistance to changes of use of employment floorspace is not adequately justified in the light of housing need (see Key Question XXX above).

Examination of the Guildford Local Plan: Strategy and Sites

Respondent: BOC Limited (Glen Jenkins)

Agent: Savills (Andrew Fido)

29. Policy E4(1): "complementary to the activities of the University of Surrey" is too vague to allow an assessment of a scheme and too restrictive of business and should be deleted.

BOC supports the Inspector's comments, although still seeks an additional change comprising the removal of the existing text in Policy E4(1) *'in any science, including social science'* for the soundness reasons set out above.

However, as at the date that Examination Statements are required, Guildford BC has not responded to the Inspector's comments or indicated any revised wording, although these are expected in due course.

BOC therefore wishes to reserve its right to appear at the Examination, though may remove its objection in light of Guildford Borough Council's expected further response.

Contact Details:

Andrew Fido

Savills

01202 856800

afido@savills.com