

# **BPF Employment Land Manifesto**

**July 2021**



BRITISH  
PROPERTY  
FEDERATION

## Introduction

Sustainable communities need jobs and therefore planning for employment is an important function of the planning system. The recent Planning for the Future White Paper was focused on housing and made no meaningful reference to the need to plan effectively for employment land, something which we want to remedy constructively. As we emerge from the pandemic, the planning system should be doing everything it can to secure employment growth and therefore support economic recovery.

The need to tackle the nation's housing crisis is irrefutable but planning places without jobs and leisure opportunities is simply storing up problems for the future. Such places will not be desirable places to live, nor sustainable - economically, socially or environmentally. Any new planning system must therefore reflect the clear relationship there is between housing and employment land.

## Supporting growth

This manifesto sets out to suggest positively how planning for employment land can be improved. Much of the focus is on industrial and logistic uses, which are seeing tremendous growth in demand for space. The pandemic has certainly accelerated demand for more online shopping, but there are many other longer-term factors driving a race for industrial space: from the growth of biotech and other high-tech manufacturing to supply-chain changes coming from our new trading relationship with the EU and the world.

Our top three priorities for a planning system that better plans for industrial and logistics are:

1. Recognising the needs of the industrial and logistics sector both as part of a green economic recovery but also its contribution to the other objectives of sustainable development;
2. Enshrining this in national policy so that sufficient land is identified in the right locations for logistics requirements through the plan-making process;
3. Ensuring appropriate and responsive policy mechanisms are in place to ensure a sufficient pipeline of employment land to meet modern societal needs.

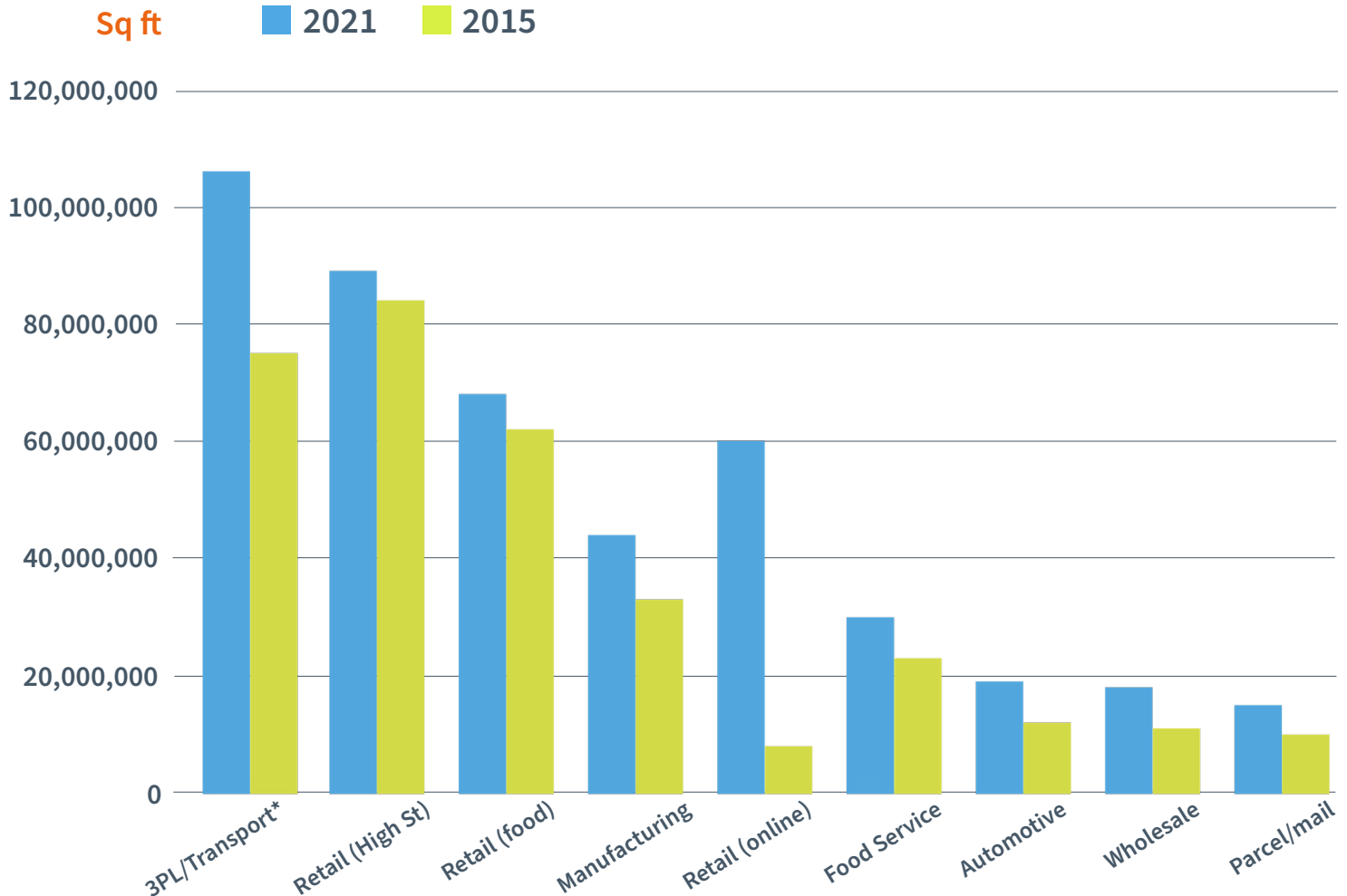
We set out below several further suggestions on ways in which a future planning system can support the provision of employment land.

### 1. Introduce a Presumption in Favour of Logistics Development

When a precise set of logistics criteria are met a presumption in favour of logistics development should apply. At present, the Local Plan process is too slow to respond to significant market shifts, such as the COVID-induced acceleration in the growth of e-commerce. This resulted in record levels of take-up of logistics space in 2020 and, going forward, with very low vacancy rates nationally, there will be pressure to identify more employment land in suitable locations to satisfy future demand within this highly resilient growth sector. However, the issue is that it takes years for Local Plans to be adopted and this timescale is completely out of kilter with the pace of market changes.

## Who occupies warehouse space?

Floor space by sector (million square feet)



Source: Savills, 2021

**Government should therefore amend the NPPF at the next opportunity. The criteria for a logistics presumption may include:**

- Easy access and proximity to the strategic highway network.
- Ability to provide effective access by non-private car to suit shift working patterns.
- Located away from residential development/where there is no unacceptable impact on residential amenity to allow for uninterrupted 24 hour working.
- Capable of accommodating large scale buildings in terms of both footprint and height.
- Sites which suit the future occupier's needs.

North West Leicestershire District Council Policy EC2 and North Northamptonshire Joint Core Strategy Policy 24 are good examples of how this can operate at a local level and we would encourage more local authorities to adopt a similar approach.

## 2. Improve Cross-Boundary Planning to Deliver Strategic Employment Sites

The recent Planning White Paper proposed the abolition of the Duty to Cooperate, which is the only statutory arrangement for strategic planning and the exporting of unmet local need to adjacent authorities. The BPF's Report 'What Warehousing Where?' highlights the inextricable link/interdependency between housing and employment space such that if there are binding housing targets, there should also be binding targets for employment land to ensure new homes have access to the services they would expect. This should include a standalone logistics requirement to accord with the PPG.

The National Infrastructure Commission warned recently that *'an absolute focus on delivering homes without consideration of how freight will service growth will be of detriment to both housing and freight. Without better recognition of the value of freight in planning, the freight system will encounter more pinch points, restricting its capacity to operate efficiently and deliver goods in the most sustainable way possible'*.<sup>1</sup>

The BPF sees a role for Mayoral Combined Authorities and/or LEPS in delivering strategic employment site allocations through new spatial planning powers that could assist in greater co-ordination of cross-boundary issues and the imposition of such targets.

## 3. Logistics and Local Plans

The requirement set out in the PPG for logistics to be assessed and planned for separately from more traditional industrial uses needs to be enforced more robustly. There is a role for Local Plan Inspectors to ensure this is complied with and a need to ensure that proposed allocations are in the right locations to respond to a broad range of market needs.

Where the intensification of existing employment sites is proposed this should be critically reviewed to ensure this is feasible and results in market-facing outcomes.

## 4. Industrial/logistics-friendly Design Codes

The National Model Design Code and Building Better Building Beautiful agenda are fundamental aspects of residential development but must not prejudice important industrial and logistics development that play a fundamental and growing role in meeting societal needs. It is important that policy makers understand the requirements of the market and that the market is fully engaged in formulating any design codes.

## 5. Ensure the industrial and logistics sector is recognised for its focus on ESG: making a valuable contribution to the Government's Green Industrial Revolution and generating social value

Reducing carbon emissions is at the very heart of decisions made around the construction and operational phases of development with net zero carbon and biodiversity net gain key considerations. Furthermore, developments are embedding themselves in the communities they serve providing a diversity of jobs for local people, including more well-paid positions; upskilling and apprenticeships; localised supply chain opportunities and plugging into community initiatives. The BPF have commissioned a research piece that will consider these aspects in greater detail that will be published later in the year.

<sup>1</sup> National Infrastructure Commission (December 2018) Future of Freight Interim Report, Page 4.

## 6. Modernise Employment Land Reviews

Employment Land Reviews are the bedrock of planning for employment use. As currently constructed, however, they are too static and often out of date by the time of adoption. There are opportunities with the Planning White Paper to allow for the utilisation of ‘real time’ information so that Employment Land Reviews can be kept up to date and responsive to changes in local market conditions. There is also a need for Employment Land Reviews (as part of feeding into the wider local plan adoption process) to be more detailed in terms of providing a view on what specific employment uses are needed locally.

## 7. Introduce an ‘Employment Land Delivery Test’

An Employment Land Delivery Test, similar to the Housing Delivery Test or Five-Year Housing Land requirement, would ensure that a commensurate amount of employment land is brought forward to counterbalance housing and that any employment land lost to other uses is delivered in the right locations. If a local planning authority failed to meet the delivery test, a presumption in favour of sustainable logistics development could be engaged.

## 8. Introduce Zoning (and add a fourth Zone)

We broadly support the Planning White Paper proposals to deliver a system that provides greater certainty for developers and communities, by zoning land according to whether it is designated for growth, renewal or protection. In most circumstances, we think this works well. However, the proposed approach will not work for large scale regeneration sites or urban extensions, where the long-term delivery of ‘place’ requires continuing dialogue with communities. We had therefore suggested a sub-set of ‘growth’, what we call ‘long-term growth’. It might have some of the following facets:

### Box 1 – Long-Term Growth Zone

The following table sets out some of the parameters of a long-term growth zone and the possible options that might help define it.

<b>Name</b>	Long-term growth	
<b>Definition</b>	Define in terms of number of homes	1000+ or 1500+ homes
<b>And/or</b>	Define in terms of delivery timeframe	30+ or 60+ months
<b>Consenting regime</b>	Key is exception to other growth areas and does not have an outline permission at start	
	Could have a prescribed framework of phases and timescales	1. Working up an outline 2. Define phases 3. Reserved Matters
	Alternatively, could have a prescribed consenting regime, such as LDO or DCO	
<b>Other issues</b>	Infrastructure – much of it will be early in the process and provided by the developer	Must be in lieu of charge
	Consultation – heavy consultation builds trust upfront	A behavioral covenant
	Design – broad parameters, must be able to accommodate change	National design code sufficient at start

## 9. Town Centres and the greater use of Local Development Orders

The Covid-19 pandemic has only accelerated change on our high streets over the past year. Coupled with the recently announced commercial to residential PDR, high street employment uses will increasingly become more under threat to permanent conversion to housing. The BPF believe there is a more effective approach to revitalise our high streets - the NPPF could give clearer direction that local authorities must plan for town centre renewal, and greater support for local authorities seeking to adopt Local Development Orders.

We find there is certainly the will and enthusiasm at a local level to do this. What is often lacking is resource. With resource, local planning authorities could put in place Local Development Orders that are more attuned to what planning flexibilities are needed at a local level to stimulate town centre renewal.

## 10. Town Centre Investment Zones

The BPF have been advocating the introduction of Town Centre Investment Zones. These are designated areas within which a broad range of local stakeholders gain enhanced powers and tax incentives that support town centre adaption, on the condition that they together have put forward a clear, coherent local plan for high street renewal. Town Centre Investment Zones would be powerful tools through which to align local incentives towards regeneration, and as a consequence, would ensure a plan for and the means of delivering the necessary employment space that supports successful high-streets.

**For more information on this manifesto please contact:**

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