



Memo

Our ref 30819/GW/SC
Date August 2012
Subject Brecon Beacons LDP Examination: Employment

1.0 Introduction

- 1.1 In order to ensure that all relevant points are taken into account, this note provides a response to the Inspector’s Preliminary Note (2) in relation to the raised employment issues.
- 1.2 This note provides a written response to individual issues raised and, where appropriate, refers to the specific paragraphs of the Brecon Beacon National Park’s (BBNPA’s) Employment Land Review (ELR).

Preliminary Note 2 Paragraph Number	Task/Query	BBNPA Response
3 (& 88)	Assess the current employment and future expansion needs of existing businesses or those seeking to invest in the area. This assessment should be informed by liaison with key stakeholders.	<p>The Employment Land Review provides a comprehensive response to the Inspector’s noted requirements.</p> <p>Chapter 4 of the Employment Land Review (ELR) considers the current stock of employment space in BBNP.</p> <p>Chapter 7 of the ELR considers the future need for employment space in BBNP.</p> <p>The findings of the ELR were also informed by consultation with local businesses, agents and other stakeholders (see Chapter 5 for findings).</p> <p>Chapter 10 includes the ELR conclusions and recommendations. Specifically recommendations 2, 3 and 4 confirm the resultant employment requirements for the BBNPA (up to 2022).</p>

5	Inspector states that the existing employment rate in the BBNPA (10%) appears low.	<p>The Inspector makes reference to the Employment Issues Paper Addendum (July 2011) (see footnote 6 in Inspector’s Note Number 2) although we consider this comment relates to Table 5.1.1.1 of the Employment Issues Paper (September 2010). This table calculates that 12 units were vacant out of a total of 108 units. This equates to 11.1% of units in the BBNP. A vacancy rates based on floorspace is not available.</p> <p>Bullet point 6 of ELR paragraph 7.32 considers the adequacy of this vacancy rate and its suitability for future needs. It states that:</p> <p><i>“11% is only very slightly above the level that is typically “required” for the effective operation of the market. As such, it is not considered that there is any significant scope to reuse existing vacant premises in order to meet future employment requirements. In addition, when considering the possible reuse of vacant premises, regard should be given to its suitability for future needs. The views raised by consultees to this study suggested that many of the vacant premises are not best suited to meet the needs of current and potential future operators”.</i></p>
7	Consideration of the suitability of the existing employment land and property supply in terms of geographical and development requirements.	<p>Chapter 4 of the ELR outlines the current stock of employment space in terms of unit size, type, geographical spread, vacancy rate and planning applications.</p> <p>The suitability of the existing employment land and property was discussed with stakeholders (see chapter 5 of ELR).</p> <p>Stakeholder discussions indicated that BBNP required mostly smaller-scale, start-up employment units (see paragraph 5.11) within property hot-spots such as Brecon and Hay-on-Wye (see paragraph 5.12).</p>
8	Consider whether the supply of available employment land identified is sufficient to keep pace with the projected level of growth throughout the life of the LDP	<p>Chapter 7 of the ELR considers the future need for employment in BBNP. ELR paragraph 7.19 confirms that the overall employment forecasts for Brecon Beacons reveal a projected 8% reduction in employment levels between 2007 and 2022, although it should be recognised that this overall reduction masks some projected job growth within certain sectors.</p> <p>With this in mind the ‘key sector scenario’ (policy-on scenario) (see ELR</p>

		<p>paragraphs 7.57 to 7.64 for further details) was considered the most appropriate. This scenario considers the implications of a strategy that seeks to promote growth within the key economic sectors in the Brecon Beacons. As such, it adopts a more positive approach than the baseline, without simply rolling forward past trends or assuming that growth within the National Park will be proportionately the same as for Wales as a whole.</p> <p>Taking into account (composite) sensitivity testing which considers the effects of some spaceless growth (i.e. people working from home) and differences in the density of employment development (see ELR paragraphs 7.85 - 7.86 for further details) and a flexibility allowance of 0.5 hectares, provision of 1.5 hectares of land was considered appropriate between 2012 and 2022.</p> <p>This amount of land is considered to be sufficient to keep pace with growth during the LDP period.</p>
9	Will the employment allocations provide sufficient employment opportunities in the Primary and Key Settlements?	<p>The site specific allocation policy choices should essentially be determined by the BBNPA, in line with the Plan's spatial strategy, however consultation undertaken as part of the ELR suggests that Brecon and Hay-on-Wye are key property hotspots.</p> <p>The ELR also considers the future employment needs for the BBNP and concluded that 1.5 hectares of B use class uses are required between 2012 and 2022. Recommendation 4 in chapter 10 provides a breakdown of this overall figure into 0.9 hectares (B1 office use) and 0.6 hectares (B8 storage use). It states this should largely consistent of smaller sites to provide to start-up units.</p> <p>The ELR states that this employment land level should be viewed as a minimum rather than a maximum and that LDP policies should still seek to allow for B use class employment development on windfall sites provided the site is located in an appropriate location and subject to specific criteria relating to its scope and potential importance (see recommendation number 5 in Chapter 10.</p>
10	Consider the adequacy of the 2ha threshold as set out in Policy SP12 (Economic Wellbeing) and whether this	Following the completion of the ELR, the 2 hectare threshold included in SP12 (Economic Wellbeing) is recommended to be reduced to 0.5 hectares (see

	threshold will provide adequate flexibility and sufficient opportunities.	recommendation 2 of the ELR). This better reflects the smaller scale units which are evidenced to be prevalent within the BBNPA context (see paragraphs 4.13-4.16 in ELR Chapter 4).
12	With reference to the Brecon Economic Development and Regeneration Strategy which identifies a need for small-scale flexible business units to meet the requirements of Small/Medium Enterprises (SMEs), is sufficient provision made for smaller scale premises?	The ELR recommends provision of 1.5ha as a minimum rather than a maximum. The ELR also recognises the reported requirement for smaller scale, start-up units and this is reflected in the recommended smaller site threshold of 0.5 hectares (to be outlined in Policy SP12).
14 & 93	What contribution do the allocated mixed-use sites make to the supply of employment land? Will sufficient employment land be secured to ensure these are developed as planned? Is there likely to be significant pressure to develop a higher proportion of these sites for housing?	<p>The contributions made by the mixed use sites are as follows:-</p> <ul style="list-style-type: none"> - UDP allocation B17 opposite High School, Brecon 137 dwellings and 0.5 employment - DBR-HOW-E Land adjacent to Football Field, Hay-on-Wye 0.6 employment - Hay Road, Talgarth 23 dwellings and 0.16 employment <p>*Please note the above contributions comprise focussed changes to the LDP and needs to be subject to member scrutiny and public consultation in due course.</p> <p>The forthcoming revised LDP is proposing to allocate some 2.06 hectares of employment land (although this will be subject to member scrutiny and public consultation), which is well above the 1.5 hectares recommended in the ELR. This will allow for a range and choice of sites (above and beyond the flexibility margin built into the NLP analysis).</p>
15 & 89	<p>What is the likelihood of the former UDP employment allocations coming forward for development?</p> <p>Why have some UDP allocations been carried forward?</p> <p>Are Sites carried forward from the UDP likely to be deliverable?</p>	<p>The following proposed LDP employment or mixed use sites were formerly UDP allocations:</p> <ol style="list-style-type: none"> 1. Hirwaun Industrial Estate (formerly UDP Policy HW1 for General Industrial B2 uses) 2. Health Centre, Hay-on-Wye (formerly UDP Policy H6 for residential/offices/leisure uses)

		<p>3. Hay Road, Talgarth (formerly UDP Policy T6 for unspecified mixed uses)</p> <p>4. Land Opp. High School, Brecon (formerly UDP Policy B17 as a Regional Employment Site [B1])</p> <p>The purpose of the ELR was to consider the Site's appropriateness for B use class employment uses only.</p>
16	Will the employment allocations provide a better link between the provision of employment and housing in line with the objectives of the LDP and National Park Management Plan?	See table 1 below which sets out the spatial alignment between the LDP housing and employment allocations. The table clearly shows the vast proportion the LDP employment sites be allocated within Brecon (identified Primary Key Settlement) or the other identified Key Settlements such as Hay-on-Wye and Talgarth. This approach respects the LDP's Spatial Strategy, as set out in Chapter 4 of the LDP.
17 & 90	How does the availability of employment land and premises in areas outside the National Park help meet employment needs?	<p>Paragraphs 8.2-8.10 of the ELR considers the availability and suitability of employment sites outside the National Park in meeting the NPA employment needs.</p> <p>The ELR paragraphs conclude that on review it is evident that the sites identified are not suitable to support any needs of the National Park. Their location or function are not favourable to that of the National Park and can therefore not accommodate any of the need identified. For this reason, the identified employment land requirements should be provided for in full within the National Park.</p>
18	What are the implications of a failure to deliver the required amount of employment land and premises? Has the flexibility of the Strategy to response to this scenario been explored?	<p>The ELR undertook some sensitivity analysis to establish the impacts of spaceless growth (i.e. working at home) and also differing densities of employment development on the preferred 'policy-on' employment scenario.</p> <p>ELR paragraphs 7.72 to 7.86 contain the results of this sensitivity testing in terms of job generation and employment land requirement.</p> <p>The forthcoming revised LDP is proposing to allocate some 2.06 hectares of employment land (although this will be subject to member scrutiny and public consultation). This allocation level is well above the 1.5 hectares recommended in</p>

		the ELR and will allow for a range and choice of sites (above and beyond the flexibility margin built into the NLP analysis).
19	Would locating a residential use here prejudice the development of the adjacent strategic employment site?	Consultation with some stakeholders did raise a concern with regard to the location of the gypsy and traveller site adjacent to the Brecon Enterprise Park however it is considered that this use will not prejudice the development of the adjacent strategic employment site. The Enterprise Park remains a major employment area which is located in the Key Primary settlement of Brecon and benefits from excellent strategic access linkages to the A470. In addition, due to the scale of the boundary between the sites and the absence of a direct link between the proposed gypsy and traveller site and the adjacent Brecon Enterprise Park this is not considered to prejudice future development.
20	How does the proposed allocation in Hirwaun accord with the Strategy set out in Policy SP12 and Policy 17?	<p>The findings of the ELR confirm that the BBNP requires small scale sites (approximately 0.5 hectares in size) totalling 1.5 hectares over the Plan Period.</p> <p>The Hirwaun site already benefits from planning permission for a sustainable waste resource recovery and energy production park including some B1/B2 uses (LPA Ref: 08/02488/FUL approved on 21st December 2010). Reflecting this commitment the Site is included as an employment allocation in the BBNPA Plan.</p> <p>However despite the Site's location within the BBNPA, due to the Site's physical relationship with Hirwaun and its large-scale it operates in reality to serve the needs of the need arising from the Rhondda Cynon Taff market rather than the BBNPA.</p> <p>As a result, the Site is not considered to contribute towards the identified employment land requirement for BBNP.</p>
21 & 91	<p>Consider whether there is scope to allow for flexibility in the LDP for the expansion or modernisation of the Industrial Estate located in Gilwern to meet future needs?</p> <p>Are there other vacant plots within existing Industrial</p>	<p>Consider this comment is no longer relevant considering the new evidence presented in the ELR which identifies a requirement for 1.5 hectares.</p> <p>Nevertheless recommendation 7 of the ELR seeks to ensure that LDP policies provides a positive criteria based approach which seeks to allow for appropriate conversions/changes of use for B use class employment proposals, as well as</p>

	Estates which could be considered for employment allocations?	employment generating non B uses.
22	Questions how Policy 18 (as amended) can permit the change of use of existing employment sites and premises in circumstances where it can be demonstrated that there is an adequate provision of alternative employment in the area, in the absence of an evaluation of the current and future employment needs of businesses.	The ELR provides an assessment of current and future employment needs of business (see ELR Chapters 4, 5 and 7). Recommendation 9 of the ELR states that <i>“the LDP should contain a policy which seeks to protect existing B class employment facilities unless there are clear reasons to justify any such loss”</i> . BBNPA is scheduled to consider this ELR recommendation as part of forthcoming focussed changes to the LDP.

Table 1: Spatial Alignment of Employment and Housing

Hierarchy	Settlement	Allocated Housing (LDP) No of Dwellings	Allocated New B use class Employment (Ha)
1.Primary Key Settlement	Brecon	443	1.3
2.Key Settlement	Talgarth	59	0.16
	Crickhowell	40	0
	Hay-on-Wye	79	0.6
	Sennybridge & Defynnog	79	0
3. Settlements	Bwlch	24	0

	Cefn Bryn Brain	0	0
	Crai	15	0
	Gilwern	112	0
	Govilon	93	0
	Libanus	3	0
	Llanbedr	9	0
	Llanfihangel Crucorney	30	0
	Llangorse	8	0
	Llanigon	10	0
	Llanspyddid	10	0
	Pencelli	12	0
	Pennorth	6	0
	Ponsticill	28	0
	Pontneddfechan	5	0
	Talybont on Usk	57	0
4. Limited Growth Settlements	Llanelly Hill	0	0
	Llangynidr	18	0
	Trecastle	0	0
	Ynyswen	0	0
Other	Abergavenny	27	0

	Rhosaman	15	0
	TOTAL	1174	2.06¹
Hirwaun commitment			5.8 hectares

¹ This proposed allocation level will be subject to member scrutiny and public consultation.