

Cardiff Replacement LDP Examination

Economic

Action Point HS6.6

Council to review Policy EC6

- *Address tension between need to demonstrate no need for office accommodation (i) with requirement to provide it (ii).*
- *Consider whether phrasing ‘current format’ can be more clearly explained*
- *Clarify reference to residential in (ii) to make clearer what is intended*
- *Test re-drafted policy to ensure it provides the intended protection to office accommodation. As drafted it would potentially not require an element of office use to be provided.*

Redraft to remove ‘and/or’ introducing additional clauses if required

Council Response

In response to the Action Point it is proposed that Policy EC56 and the supporting text be amended as follows:

EC6: PROTECTING OFFICES IN THE CENTRAL AND BAY BUSINESS AREAS

The loss of office accommodation within the Central and Bay Business Areas will not be permitted unless it can be demonstrated that:

- i. the loss would not undermine the economic role and function of the Central and Bay Business Areas through an unacceptable reduction in the supply, range and choice of office accommodation;**
- ii. there is no reasonable prospect of the premises being retained or reused for office purposes, having regard to the demand for office accommodation and the need to maintain an appropriate supply, range and choice of office premises; and**
- iii. opportunities for refurbishment, adaptation, subdivision, reconfiguration or redevelopment to retain or provide office accommodation have been fully considered, and evidence has been provided as to why such opportunities are not viable or deliverable.**

Where the requirements of criteria i to iii have been satisfied, proposals involving the change of use of office accommodation to non-employment (residential) uses, will be expected to retain or provide an element of office floorspace where this can reasonably be achieved as part of a mixed-use development.

7.122 Policy EC6 seeks to protect the supply, range and choice of office accommodation within the Central and Bay Business Areas identified on the Proposals Map, supporting

the needs of existing and future occupiers. This applies to office accommodation whether occupied, vacant or subject to planning permission.

7.123 The Central and Bay Business Areas contain a wide range of office premises, including modern Grade A accommodation (e.g. Central Square), high-rise accommodation built in the 1960s and 1970s (e.g. Newport Road), office accommodation above commercial premises (e.g. St Mary Street and Greyfriars Road), and historic villas in the north of the Central Business Area (e.g. Park Place and Windsor Place). This range provides accommodation for businesses with different requirements and supports the continued economic role and function of the Central and Bay Business Areas.

7.124 To ensure that Cardiff continues to attract and retain businesses, the Central and Bay Business Areas should maintain a sufficient supply and range of office accommodation to meet the requirements of existing and future occupiers. This includes large Grade A offices, accommodation for small and medium-sized enterprises, incubator units and flexible workspace. The loss of individual premises may appear limited, but the cumulative effect of successive changes of use can reduce the range, choice and availability of office accommodation and undermine the employment function of the CBBA

7.125 Applicants will be expected to provide evidence to demonstrate that there is no reasonable and demonstrable prospect of the premises being retained or reused for office purposes. This should include evidence that the premises have been genuinely and effectively marketed for continued office use, normally for a continuous period of at least 24 months, at a realistic asking price or rent having regard to prevailing market conditions and the characteristics, condition, location and size of the premises.

7.126 The Council will have regard to the length and nature of the marketing exercise, the asking price or rent in relation to prevailing market conditions, the condition and suitability of the premises, the levels of interest and enquiries received, and any offers made. The absence of a successful letting or sale will not, in itself, demonstrate that there is no reasonable prospect of continued office use. The evidence will be considered as a whole, having regard to the suitability of the premises and demand for office accommodation of the type, size and location concerned.

7.127 Some office vacancy is necessary to allow for the normal turnover of businesses and for the renovation, adaptation or modernisation of premises to meet changing business requirements. However, prolonged vacancy can adversely affect the attractiveness, vibrancy and viability of the CBBA. Vacancy will therefore be considered in the context of prevailing market conditions, the length and nature of the vacancy, the condition and suitability of the premises, and the level and nature of demand for office accommodation.

7.128 It is recognised however that over time, some office premises can become outdated in their current format (for example through floorplate layout or supporting data infrastructure) and no longer meet the needs of modern working practices. In such

circumstances applicants will also be expected to demonstrate that reasonable opportunities to retain all or part of the office use have been properly considered. This may include refurbishment, modernisation, adaptation, subdivision, reconfiguration or redevelopment of the premises.

7.129 Where non- employment (residential) uses are proposed, applicants will be expected to demonstrate how opportunities to retain or re-provide office floorspace as part of a mixed-use development have been addressed. Mixed-use redevelopment of office premises within the Central and Bay Business Areas can create opportunities to provide a greater range and choice of new and upgraded office floorspace, particularly regarding small and medium-size enterprises. Uses can include, for example, flexible workspace for enterprise startups and early-stage growth, hot desking and co-working spaces. Such provision can help lead to the intensification and diversification of employment uses in an area and, where retained at the ground floor, can contribute towards the attractiveness and viability of streets and public spaces by providing active commercial frontages.

7.130 The intention is not to require a fixed proportion or quantum of office accommodation in every development. The amount and type of office floorspace that may reasonably be retained or provided will depend upon the characteristics, location, condition and suitability of the premises, demand for office accommodation and the contribution that the premises make to the employment function of the Central and Bay Business Areas.

7.131 Where an element of office floorspace can reasonably be incorporated, it should be designed and located so that it can function effectively for office purposes and contributes to the supply, range and choice of office accommodation. Where the applicant considers that office provision cannot reasonably be achieved, the applicant should provide evidence explaining why this is not feasible or appropriate.

7.132 Where the Council is satisfied that office provision cannot reasonably be achieved, an appropriate contribution towards compensatory employment opportunities elsewhere in the County may be sought in accordance with Policy SP6 Planning Obligations.

7.133 The policy does not seek to retain office premises irrespective of their suitability or market demand. Rather, it seeks to ensure that the loss of office floorspace is properly justified, that reasonable opportunities for its continued or partial retention have been considered, and that loss of office floorspace does not undermine the Plan's economic strategy and the role and function of the Central and Bay Business Areas.