

CARDIFF COUNCIL REPLACEMENT LOCAL DEVELOPMENT PLAN EXAMINATION

Further Written Statement – Hearing Session 6 – Employment

Representor: Allied Bakeries Limited

Representor Number: 67

1. Introduction

- 1.1. This Statement has been prepared on behalf of Allied Bakeries in respect of Hearing Session 6 on Employment.
- 1.2. Allied Bakeries currently operates from the site (extending to circa 2.7ha) at Maes-Y-Coed in Heath, located immediately to the south of Ty Glas Station. It forms part of Allied Bakeries' operation as a distribution depot for the business. The existing buildings on site are several decades old, and are therefore likely to reach the end of their life within the plan period of the Replacement Local Development Plan (LDP). As such, Allied Bakeries seeks the Replacement LDP to respond positively to the needs of the business as well as the site's renewal/redevelopment opportunity during the plan period, should the site come forward for renewal.
- 1.3. It is designated as Existing Employment Land (Site Ref: EC1.7) in the adopted Local Development Plan (LDP). It was identified as a Candidate Site for Allocation (ref: 85). Our representations supported this, as the site is highly sustainable previously developed land and a suitable urban site for a higher density development with potential to accommodate a wide range of uses, should the existing site come forward for renewal during the plan period. However, it has not been selected for development allocation as the Council considers that it is not appropriate to remove the site from the Existing Employment Land designation, with regard to the existing employment uses on the site, and that should the site become vacant during the plan period, any alternative use of the site will be considered against Policy EC5A: Alternative Use of Employment Land and Premises.
- 1.4. Therefore, this Statement provides our representations on Policies EC5A and EC5B which are relevant to the consideration of alternative use of protected employment land and premises in response to Hearing Agenda 4.2 and 4.3.

2. Representations

4.2 How realistically can the criteria in Policy EC5A be satisfied in practice if sites have been identified as suitable for ongoing employment use?

- 2.1. Supporting paragraph 7.111 states that consideration will only be given to alternative uses where an applicant is able to clearly demonstrate that there is no demand for the site and that it is unviable to retain the site in employment uses. Criterion i) of Policy EC5A requires evidence to demonstrate that there is no need to retain the land for employment use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use.
- 2.2. Supporting paragraph 7.112 provides clarification on evidence required. The set of criteria to be included in the evidence in respect of Criterion i) of Policy EC5A disregards marketing evidence which may robustly demonstrate that there is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaption/ refurbishment or redevelopment, which would satisfy Criterion ii) of Policy EC5A. If it is demonstrated that there is no realistic prospect of employment use on site, having regard to marketing evidence and viability, it is unreasonable for the applicant to also satisfy Criterion i), as this criterion goes beyond the requirement to demonstrate that there is no demand for the site and it is unviable to retain the site in employment uses.
- 2.3. For example, if there is no marketing demand for the site for employment use, it will not come forward for employment use regardless of whether there is the site offers particular benefits not generally available within the overall land bank, which is one of the criteria for robust marketing evidence. In that case, Criterion i) of Policy EC5A could have the effect of protecting designated sites from being reused or redeveloped in perpetuity.
- 2.4. It is therefore considered that Policy EC5A and supporting paragraph 7.112 should be amended for the soundness of the plan so that alternative use will be permitted if Criterion i) or Criterion ii) (and Criterion (iii)) is satisfied.

4.3 The land-use benefits of mixed-use development, and the potential for new higher value development to cross subsidise employment development, are understood. Where a site has no realistic prospect of continued employment use, is there an inherent tension in requiring new employment workspace within mixed-use redevelopment under Policy EC5B at that site?

- 2.5. If Criterion i) or ii) of Policy EC5A has been satisfied, and it would not be viable to provide new employment workspace or community facilities as part of a mixed use-residential development and it will result in creating accommodation that fails to secure an occupier and/or affect the overall financial viability of the development. Therefore, Policy EC5A is not considered to be sound.