

LOCATION OF LARGE OFFICE DEVELOPMENTS AND PUBLIC TRANSPORT ACCESSIBILITY

Government Policy

PPG13 – location of high trip-generating uses

PPS4 – town centre first – retail, offices, leisure, etc

Offices – in town centres and within 500m of a major public transport interchange:

Office proposals are subject to:

- **assessment of need**
- **sequential approach – town centres & PT interchanges first**
- **impact**

London Plan

UDP

Highly-accessible locations – locations outside town centres/major public transport interchanges – within 400m (crowsflight)/500m walk of major public transport interchange/station – very similar to PTAL 5 boundary.

Employment Zones: to concentrate small-scale business development in the Employment Zones (E25)

Council's Track Record

The Council did not understand or has wilfully misunderstood national, London and its own policy for the location of large-scale office development.

Almost all planning consents for major office developments in last 10 years were outside town centres and further than 400m from major public transport interchanges.

A large amount of office development went to Employment Zones – contrary to the Council's own policy

Freston Road Area

The Freston Road area epitomises this misunderstanding.

The most extreme example is the Monsoon HQ – 28,000sqm (over 300,000sqft) in an area with a PTAL of 2/3.

Since then several other developments have come forward, including one of 6,650sqm.

The proposal was refused in March, on the grounds:

The proposed development would provide a large-scale office development within the Freston Road Employment Zone, contrary to Policy CF5 of the Proposed Submission Core Strategy and its associated evidence base, and no material considerations, including the extant permissions on the site, were considered to be of sufficient weight to justify a grant of planning permission in this instance.

The decision was appealed using written representations to get a fast decision, but this appeal has now “lapsed”.

Last month a new application was received for a scheme consisting of:

Ground floor: 8 small units – each between 84sqm and 133sqm (gross)

First Floor: 2 units – 727sqm and 686sqm

Second Floor: 2 units – 727sqm and 627sqm

Third Floor: 1 unit - 1,093sqm

The ground floor is as before, only the first and second floors have changed into two units each.

And now – surprisingly – the Council has proposed a change in policy from:

Employment Zones

CF5 (k) Large scale offices will be resisted To

CF5(k) Permit large office developments where consisting entirely of very small, small or medium units. Large scale offices will be resisted.

The effect of this change would be to allow any amount of offices on a site in an Employment Zone as long as none of the units were more than 1,000sqm

This is a complete nonsense and contrary to national, London and local policy for large-scale office developments.

Conflict with Policy

The purpose of the policy is to put high trip-generating uses in town centres or close to major public transport interchanges – to get the right business in the right place.

What is being proposed is a large quantity of office jobs in the wrong place.

The “justification” being presented is that “small business units” employ a high proportion of local people so asking for “very small, small and medium units” ensures this.

The facts – according to the 2001 Census travel to work data – shows that only for businesses with 9 or fewer employees is this true – probably concentrated in businesses with less than 5 employees. For firms with 10 or more employees this was not so – less than 20% of staff were local.

This would mean that the units with 10 or fewer jobs/under 150sqm (gross) might have a higher proportion of local people. Any businesses larger than this would have the same proportion – less than 20% local people.

For units of more than 150sqm (gross) the trip generation would be the same as for a large-scale office.

The current proposal would set no limit.

Proposal:

Retain original proposed policy OR

Change policy to:

Permit large office developments only where they consist entirely of very small and small business units subject a maximum of 2,000sqm. Large-scale offices will be resisted

Council's New Proposed Changes

Para 31.3.37

The Council recognises that business centres make an important contribution to the function of the Employment Zones, as they assist in providing the flexible workspace which is in particular demand from the Borough's creative and cultural industry. New business centres, or other large office developments with a total floor area greater than 1,000 sq m may, therefore, be supported, where these are made up entirely of very small, small or medium-sized units. The Council does, however, recognise that any large-scale business developments may have the potential to cause a material increase in traffic congestion and, therefore, will be carefully assessed against the requirements of Policy CT1.

The Society **strongly objects** to the proposed change because:

- it would be in direct conflict with its policy of resisting large-scale business developments in areas that are not highly accessible by public transport;
- "medium-sized units" (300sqm - 1,000sqm) are too large for small businesses

Proposed alternative wording:

New business centres catering for small businesses (less than 10 employees) with a total floor area no greater than 2,000 sq m may, therefore, be supported, where these are made up entirely of units less than 200 sqm. The Council does, however, recognise that any such developments, taken cumulatively with any existing developments, may have the potential to cause a material increase in traffic congestion and, therefore, will be carefully assessed against the requirements of Policy CT1.