Dear Sir/Madam

RE: GREATER MANCHESTER SPATIAL FRAMEWORK REVISED DRAFT - JANUARY 2019 - CONSULTATION RESPONSE

Rapleys LLP has been instructed by our client, Bizspace, to prepare representations to the Revised Draft Greater Manchester Spatial Framework (GMSF), currently out to consultation until 18 March 2019. These representations follow previous representations made on behalf of Bizspace, submitted in January 2017 to the Draft GMSF, and a Call for Sites exercise, in winter 2015/2016, when the Combined Authority invited landowners and developers to identify sites deemed suitable for employment or housing development.

Accordingly, this representation provides commentary on the Revised Draft GMSF with regard to our client’s aspirations for the ongoing management and future use of the following sites within the Greater Manchester area:

- Saddleworth Business Centre, Huddersfield Road, Oldham, OL3 5DF (GMSF ID: 1452693315386);
- Fieldhouse Industrial Estate, Whitworth Road, Rochdale, OL12 0AA (GMSF ID: 1452769656892);
- Grosvenor Mill Business Centre, Grosvenor Street, Ashton Under Lyne, OL7 0RG (GMSF ID: 1452695506547);
- Empress Business Centre, Chester Road, Stretford, M16 9EB;
- Astra Business Park, Guinness Road, M17 1SD, and
- Atlantic Business Centre, Atlantic Street, Altrincham WA14 5NG.

The Bizspace sites all represent urban brownfield sites. As such, the primary objective of Bizspace’s involvement in the GMSF process is to ensure that an appropriate policy framework is put forward which allows for sufficient flexibility so that some existing industrial and employment sites, when appropriate, can be released for alternative uses. This is important since the GMSF, which will constitute a strategic development plan document, will effectively shape the policy agenda at the local level as the 10 local planning authorities prepare their Local Plans, and which will provide the basis for the determination of any applications.

This letter of representation responds to questions within the consultation document; firstly, responding to the 10 general questions with one of the standardised responses as set out within Chapter 1 of the GMSF, and secondly, responding to selected questions included within the wider document deemed relevant to my client’s interests.
Question 1 - What type of respondent are you?

_I am an agent responding on behalf of an organisation_- Rapleys LLP is a firm of Property and Planning Consultants.

Bizspace is one of the UK’s leading providers of flexible employment accommodation and manages a portfolio of approximately 100 sites throughout England, Scotland and Wales comprising a mixture of business centres, industrial estates and business parks. Bizspace’s business model is based on supporting small and start-up businesses, and therefore plays an important role in the local and regional economy in terms of not only providing office, industrial and warehousing facilities on a flexible basis, but also in terms of job creation, employing approximately 180 in-house staff, based in various location across the country including Greater Manchester.

Bizspace is an experienced asset management company, continually reviewing their sites and seeking to maximise the value of the portfolio, through ongoing improvement and investment within existing sites, acquisitions of new opportunities and disposals of those sites which, for a variety of reasons, are failing to meet the Bizspace model.

As such, Bizspace is keen to ensure that the emerging GMSF (and any subsequent Local Plans) provides the flexibility necessary to allow Bizspace to continue to operate and manage its property portfolio in a way that can respond to changing circumstances, including the ability to promote sites for alternative non employment uses where appropriate.

Question 2 - Contact Details

Name: Andrea Herrick - Senior Associate - Rapleys LLP
Address: Rapleys LLP, 55 Spring Gardens, Manchester, Greater Manchester, M2 2BY
Email: andrea.herrick@rapleys.com

Question 3 - Are you over the age of 13?

Yes

Question 4 - If you’re submitting a response on behalf of an organisation or group, please also give us their details

Organisation: Bizspace
Address: 3rd Floor, Winston House, 2 Dollis Park, London, N3 1HF
Email: richard.stivaros@bizspace.co.uk

Question 5 - We would like to be able to publish responses after this consultation closes. Are you happy for us to do this?

Yes - publish my response in full
Question 6 - Do you agree that we need a plan for jobs and homes in Greater Manchester?

*Strongly agree*

Question 7 - Do you agree that to plan for jobs and homes, we need to make the most effective use of our land?

*Strongly agree*

Question 8 - Do you agree that in planning for jobs and homes, we also need to protect green spaces that are valued by our communities?

*Agree*

Question 9 - Do you agree that to protect green spaces, we need to consider how all land in Greater Manchester is used?

*Agree* - it is appropriate to consider how land is used so that it can be put to best use in meeting the development needs of Greater Manchester.

Question 10 - Is the approach that we have outlined in the plan reasonable?

*Agree* - the encouragement given to making more efficient use of land (paragraphs 1.11-1.13 and 4.8-4.14) and the ‘brownfield preference’ policy (paragraphs 1.16-1.17), which aims to ensure that brownfield sites come forward in the early part of the plan period, is supported. This represents a clear change to the Draft GMSF 2016, which failed to maximise the opportunities offered by brownfield sites and which we identified in our previous representations as a concern. However, the plan as a whole must ensure that the development needs for Greater Manchester can be met and exceeded to secure the economic growth needed, and should not simply seek to deliver the minimum level of development required.

Policy GM-P 2

Question 37 - Do you agree with the proposed policy on Employment Sites and Premises?

*Mostly agree* - the policy advises that a diverse range of employment sites and premises are needed and will be made available across Greater Manchester in terms of location, scale, type and cost, to cater for the broad range and types of businesses, from start ups to large scale inward investment. This is strongly supported.

The policy also advises that existing employment areas, including local employment areas that are important to maintaining a strong and diverse supply of sites, will be protected from redevelopment to other uses and nurtured to ensure they remain competitive. This is also supported, in principle, as much of the Bizspace portfolio comprises property within these local - as opposed to strategic - employment areas. The key, however, is in identifying which existing employment sites and premises are ‘important to maintaining a strong and diverse supply of sites’ and which are not.
In this respect, if the commitment within the Revised Draft GMSF to making the most efficient use of land and directing new development to brownfield land in urban locations is to be realised (paragraph 1.2, 1.17, Objective 2, paragraphs 4.8-4.14) the alternative use of these brownfield sites, in particular employment sites, will also be relevant and necessary. As such, it is important to ensure that Policy GM-P 2 does not represent, or become interpreted as, a blanket protection of all existing employment sites.

My client’s site, Fieldhouse Industrial Estate, in Rochdale, represents a clear case for securing a more efficient use of this employment site, which extends to 5.3Ha and supports mostly poor quality, dated buildings which attract low occupancy levels (in addition to long term vacant floorspace owing to its dilapidated condition). Significantly, the site has a confirmed market interest from a national house builder. It is anticipated a planning application will be progressed during 2019 with homes capable of being delivered within the next 5 years. Bizspace has therefore promoted the allocation of this site, for housing, through both Rochdale’s Call for Sites (August 2017) and draft Local Plan consultation (October 2018). A copy of the latter is appended to this letter for information.

Bizspace will continue to promote this site (and others) through the relevant local authority’s emerging Local Plan, but it is nonetheless imperative that Policy GM-P 2 does not have the effect of removing any flexibility, in seeking to protect this site, or other such sites, for employment uses only. This would be in direct conflict with the GMSF strategy of promoting the efficient use of land and the brownfield preference approach.

Policy GM-P 2 should therefore specifically acknowledge that some existing employment sites, particularly those that are poorly located, and offer poor quality, dated accommodation, may be capable of being offered for alternative uses, such as housing, in order to maximise the efficient use of land.

Policy GM-P 3
Question 38 - Do you agree with the proposed policy on Office Development?

Mostly agree - the policy seeks to direct office development to sustainable locations, with a focus on the City Centre, The Quays, Manchester Airport Enterprise Zone and Town Centres. The policy also encourages the refurbishment of existing office accommodation, which is supported. The refurbishment of existing accommodation represents a key option for Bizspace in maintaining and improving its portfolio to remain attractive to the market.

The policy also encourages local planning authorities to consider the need to protect existing office accommodation from changes of use to non-employment uses, such as housing, where this would compromise the continued supply of a diverse range of office floorspace. However, as pointed out above, any such protection afforded must be applied carefully to ensure that this would not prejudice the ability to secure the more efficient use of premises, or a site, in accordance with the GMSF strategy, which confirms that an essential aspect of the efficient and effective use of land will be to prioritise the re-use of brownfield land when meeting development needs (paragraph 1.2 and 4.10).

Policy GM-P 3 and its supporting text should therefore recognise that in some cases, it will be appropriate, in fact desirable, for sites to come forward for alternative uses, where this will secure the more efficient and effective use of the site.

Question 39 - Do you agree with the proposed policy on Industry and Warehousing Development?

Mostly agree - the policy outlines the requirement for industrial and warehousing floorspace within Greater Manchester, with a recognition that a range of opportunities are needed across Greater
Manchester, but with a focus on increasing the supply of new high quality floorspace in order to compete for investment and achieve long term growth.

Supporting text highlights the importance of retaining existing industrial and warehousing accommodation, particularly to support start-ups and smaller businesses seeking more local and cheaper options. It also recognises that new sites will be important to free up some poorer quality current employment sites for redevelopment for uses such as housing. Whilst this is supported, in principle, it is essential that the policy also recognises that there are instances where existing employment floorspace is historical, often poorly located, dated and of poor quality and where there is no market demand and/or where reinvestment for employment is not viable. Furthermore, the release of such sites must not be dependent on new employment floorspace coming forward, as implied in the supporting text, but should be assessed according to the merits of each case.

Policy GM-H 1
Question 41 - Do you agree with the proposed policy on the Scale of New Housing Development?

Disagree - The NPPF identifies that the requirement to provide for objectively assessed needs for housing is a minimum and therefore, it is clear that Policy GM-H 1 only seeks to provide a minimum level of housing and does not seek to plan for additional homes over and above this minimum position.

At the outset, the GMSF confirms that Greater Manchester is striving to become a top global city, with higher levels of international trade, investment, visitors, academic research and students as well as investing in strengthening existing, and creating new, employment locations so that all parts of Greater Manchester are able to contribute to, and benefit from, growth as part of a thriving Northern Powerhouse (paragraph 1.3). However, if this is to be achieved it is considered additional homes will need to planned for, over and above the Government’s minimum requirements. In this regard, the proposed policy is a direct contradiction to the overall spatial vision of the Framework.

Housing Land Supply

The Revised Draft GMSF provides a clear focus and support for directing new housing towards previously-developed sites within the existing urban area, following the brownfield preference approach, which will help to address existing dereliction and poorly used sites and reduce the need to release greenfield and Green Belt land for development (paragraph 7.28). This is strongly supported.

Summary

Rapleys LLP has been instructed by our Bizspace, to prepare representations to the Greater Manchester Spatial Framework Revised Draft, published in January 2019. Bizspace is one of the UK’s leading providers of flexible employment accommodation, of office and industrial floorspace, and manages a portfolio of approximately 100 sites throughout the county, including a number of sites within Greater Manchester. Bizspace is also continually reviewing its portfolio to maximise value, through ongoing improvement and investment, including acquisitions of new opportunities, as well as disposals of those sites which are failing to meet the Bizspace model.

As such, Bizspace is keen to ensure that the emerging GMSF (and any subsequent Local Plans) provides the flexibility necessary to allow Bizspace to continue to operate and manage its property portfolio in a way that can respond to changing circumstances, including the ability to promote sites for alternative non employment uses where appropriate.
Overall, the strategy and policies set out within the Revised Draft GMSF area supported, in particular, the priority now given to making the most efficient and effective use of available land, by adopting a ‘brownfield preference’ in bringing forward new development.

However, for the reasons set out above, policies in respect of employment land must ensure that these fully embrace the brownfield preference approach and do not preclude the alternative use of existing employment sites that do not offer the most efficient and effective use of the land now, and have no prospect of doing so in the future. As currently drafted, it is not considered the policies achieve this but rather, can be interpreted as representing a restrictive approach in seeking to protect all employment land.

It would be appreciated if written confirmation of receipt of these representations could be provided. In addition, I request that I am kept informed about any further progress or consultation which takes place regarding the new GMSF.

Yours faithfully,

Rapleys LLP

Rapleys LLP (Mar 12, 2019)
APPENDIX 1

REPRESENTATIONS IN RESPECT OF FEILDHOUSE INDUSTRIAL ESTATE,
WHITWORTH ROAD, ROCHDALE, OL12 0AA
31 October 2018

Strategic Planning
Rochdale Borough Council
Floor 3
Number One Riverside
Smith Street
Rochdale
OL16 1XU

Dear Sir or Madam,

Re: Representations on the Draft Rochdale Allocations Plan Development Plan Document (DPD), submitted on behalf of Bizspace with regards to Fieldhouse Industrial Estate (FIE), Whitworth Road, Rochdale, Greater Manchester, OL12 0AA.

Rapleys LLP (Rapleys) acts on behalf of BizSpace and is instructed to submit representations in respect of the recently published Rochdale Draft Allocations Plan, DPD currently subject to public consultation until Monday 5 November 2018.

This representation follows an initial promotion exercise, coupled with a call for sites submission in August 2017, which sought to ensure that FIE gained an allocation within the Draft Allocations Plan. However, as referenced within the Draft Allocations Plan Consultation Statement, FIE was discounted owing to the potential loss of employment floorspace that would be incurred if the site was to be redeveloped for residential use.

This representation therefore seeks to provide further justification for the inclusion of FIE within the Allocations DPD, as the consultation process progresses.

In this respect, the following are relevant considerations in promoting the site for residential use:

- The site’s location and surrounding context;
- The sites limited long term employment use;
- Potential for residential including market interest, and
- Comparisons with other sites within the Draft Allocations Plan DPD.

These are discussed further below. Please also find attached a plan illustrating the extent of the site.

**Background and Context – BizSpace**

Whilst a background introduction to BizSpace was provided within the original representations submitted, this is reiterated here for consistency and to provide some context to this representation.
BizSpace is one of the UK’s leading providers of flexible employment accommodation and currently manages a portfolio of approximately 100 sites, throughout England, Scotland and Wales, comprising a mixture of business centres, industrial estates and business parks. BizSpace’s business model is based on supporting small and start-up businesses, and therefore plays an important role in the local and regional economy in terms of not only providing office, industrial and warehousing facilities on a flexible basis, but also in terms of job creation, employing approximately 180 in-house staff, based in various location across the country including Greater Manchester.

BizSpace is an experienced asset management company, continually reviewing their sites and seeking to maximise the value of the portfolio, through ongoing improvement and investment within existing sites, acquisitions of new opportunities and disposals of those sites which, for a variety of reasons, are failing to meet the BizSpace model.

The Site and Surroundings

FIE is located 1 km north of Rochdale Town Centre, which is the principle settlement and currently hosts half the borough’s population. More specifically, FIE is located to the north of Fieldhouse Road and to the east Whitworth Road.

The site extends to 5.3 hectares and supports a range of employment uses within a mix of buildings for warehousing, offices, workshops and storage, comprising circa 70 units. The quality and type of unit varies greatly and includes office suites within the 2 to 4 storey main historic mill building and more modern single storey warehouses.

Access is taken from both Fieldhouse Road and Whitworth Road.

The site is located within a residential area. The site is separated from the two storey residential properties to the east by amenity space on Joy Street, to the north by amenity planting and to the west by Whitworth Road (A671). To the south is a further area of open amenity space and Greenbank Primary School beyond. A number of residential properties are directly adjoining the site to the south-west. Levels generally increase towards the west and northern parts of the site.

The site is located within a highly sustainable location, with good access to local facilities and services that can be reached within a 15 minute walk, or less, including:

- 4 no. Primary Schools (Greenbank, All Saints, St Patricks and Shawclough) - 0.4 – 0.6 km
- Secondary School (Brownhill) - 0.6km
- Tesco Express - 0.5km
- GP Surgery - 1km; and
- Rochdale Town Centre – 1km.

Bus stops are located immediately adjoining the site entrance providing readily accessible public transport to these facilities / locations and further afield.
Employment Use

Whilst FIE currently supports a range of employment uses, it must be acknowledged that this does not represent an efficient use of the site.

FIE has achieved a relatively poor level of occupancy over recent years of between 50-70%. This does not take into account that parts of the estate are in such poor condition or have technical issues associated with asbestos etc. that some floorspace is no longer lettable.

It is also the case that the majority of the floorspace available is dated and of a poor standard. Consequently, significant investment is needed across the estate in order to bring this up to modern days standards. This is not, however, a commercially viable option given the low occupancy levels and revenues achieved. This prevents BizSpace from securing the optimum use of the site as businesses are generally attracted to more high quality facilities that meet modern day standards and expectations.

Bizspace evidently struggles to secure occupancy of the available units, with a further quantum of commercial floorspace remaining long-term vacant due to its dilapidated condition. This is unlikely to change in the long term.

At a more strategic level it is relevant to consider the attractiveness of the site for future employment use. In this respect, the following should be noted:

- Access to the strategic network is relatively poor. FIE’s location within the north of the settlement restricts access to the M62, which runs parallel to Rochdale Town’s southern periphery and therefore necessitates HGV traffic associated with an industrial use to traverse north through the settlement.
- An employment use is not compatible with the residential area within which it is located, and which includes residential properties immediately adjacent to the site.
- The site is within an out of town location and is therefore not suited for office use.

Overall, the site is clearly underutilised with little prospect that the employment offer can be improved. Rather, the estate is likely to continue to deteriorate with a consequent decline in occupancy as the considerable investment needed to maintain and repair the property is not commercially viable.

The above should be considered in the context of the demand for employment floorspace, which is driven by a requirement for high quality modern floorspace with good accessibility to the strategic road network (in particular, the M62).

Whilst the importance of maintaining a supply of appropriate employment areas is acknowledged, it is essential that sites are considered on a case specific basis. This ensures that employment land is not just protected irrespective of its suitability. In this case, FIE comprises outdated buildings within location deriving from its historic origins that relates poorly to new infrastructure.
The loss of this employment site is unlikely to have a significant impact on existing and future employment land supply.

**Potential for Residential Use**

**Housing Supply**

Within the Draft Allocation Plan DPD, it is confirmed that Rochdale Borough Council (the Council) will need to deliver 5,860 dwellings over the remainder of the plan period 2018-2028. Henceforth, the Council are required to maintain an annual delivery rate of 586 homes until 2028, which would constitute an increase of 178 homes per annum above the 408 average achieved over the last 6 years.

It is also noted the Council's Strategic Housing Market Assessment (SHMA) sets out an Objectively Assessed Housing Need of 460 dwellings per annum. However, since the start of the plan period (2012) the Council has failed to achieve this identified need in any year, with the exception of 2017/18.

**Suitable**

FIE is within close proximity to Rochdale Town Centre. It is in a prominent location on the A671 Whitworth Road and surrounded by large residential areas and open green spaces, which create an attractive local character. The site represents a sustainable location that is perfectly suited to residential use.

The site's context indicates that it can readily support residential development in the form of a mix tenure scheme that would deliver housing for market sale together with affordable housing subject to viability considerations. The site could also support a diverse mix of housing types including traditional family housing and new apartment blocks extending up to approximately 4 storeys in height.

While the exact yield of the site would be established through the application process, it is anticipated that the site could deliver between 250-260 residential units and thereby make a significant contribution to Rochdale's housing need. In accordance with the Government's objective of significantly boosting the supply of homes, maximum yield will be sought in accordance with relevant capacity constraints.

Overall, FIE clearly represents a suitable site for housing. It would provide a significant contribution towards the local housing delivery targets.

**Deliverable and Achievable**

FIE represents a deliverable site in the context of the definition provided within the revised National Planning Policy Framework (NPPF) 2018 (Appendix 2): Notably,

- The site is in single ownership;
- There are no identified legal or other constraints (flood risk, heritage, ecology etc.);
- It benefits from two direct accesses to the highway network, and
The site is available in the short-term, with the last short term tenancy ending within the next 12 months and the majority of tenancies operating on short term (1 year) licences.

Significantly, the site has a confirmed market interest from a national house builder. It is anticipated a planning application will be progressed during 2019 with homes capable of being be delivered within the next 5 years.

**Draft Allocations Comparison**

The draft Allocations Plan DPD confirms that the Council’s approach is to promote the use of brownfield sites as main areas to develop on, with a focus on developing more on underused land and buildings rather than green spaces.

Accordingly, the Council has adopted a flexible approach to site selection in allocating existing industrial and employment sites (including allocated sites) for housing. In particular:

- 87.5% of the housing sites identified within Rochdale are located on previously developed land, which consists almost exclusively of former employment / industrial land;
- This includes a number of draft housing allocations that are within former Primary Employment Zones.

It is, however, also noted that the draft Allocations DPD includes housing sites that are considered to be less preferable when compared to FIE. In this regard, it is noteworthy that:

- 9 sites comprise undeveloped parcels of land, which seems contrary to the principle objective of achieving sustainable development when suitable brownfield sites are available;
- One of the allocations impacts on the existing Green Belt boundary;
- A number of the allocated sites are located on the periphery of Rochdale Town in far less sustainable locations that FIE; and
- The majority of the Rochdale housing sites included within the Draft Allocations DPD are large, previously developed sites where deliverability should be scrutinised.

In this context, it is difficult to understand why FIE is not included as a housing allocation. As previously rehearsed, the site should be allocated for the following reasons:

- The current use of the site for employment use fails to make the most efficient use of land and is unlikely to improve in the long-term;
- It does not comprise employment land that is in high demand given the substandard accommodation and limited accessibility to the strategic highway network;
- It is located in residential area, with the surrounding open space creating an attractive local character;
- It is within a sustainable location, close to Rochdale Town Centre with good accessibility to services and facilities;
• Its redevelopment for residential will provide tangible visual benefits for the local area replacing the existing dated, obtrusive, industrial built form, with new high quality residential development;
• It is in single ownership, deliverable and achievable;
• It has confirmed interest from a national house builder.

Overall, FIE represents a more preferential location for meeting Rochdale’s housing demands compared with a number of other sites included within the Draft Allocations Plan.

Conclusion

It is clear that the Council recognises that existing employment sites (including allocated sites) can represent appropriate locations to meet the borough’s housing requirements. In this respect, it is evident that FIE fails to secure the optimum and efficient use of the site and the employment offer is unlikely to improve. The redevelopment of this site would not jeopardise the supply of employment floorspace within the borough, since it does not provide the high quality, strategically located employment floorspace that is in demand. As such, there is no basis for precluding FIE as a housing allocation within the draft Allocations Plan.

FIE represents a suitable, achievable and deliverable housing site and would meet the objectives of sustainable development. In these terms, it is preferable to the allocation of a number of other sites within the draft Allocations Plan comprising greenfield land (including Green Belt), or other brownfield sites which potentially represent difficult sites to bring forward owing to landownership issues and other constraints. The allocation of this deliverable site would significantly contribute towards the borough’s housing requirement and annual targets, which the Council has consistently failed to meet.

In conclusion, FIE should be incorporated as a housing allocation within the Allocations Plan DPD as the plan progresses.

In accordance with the discussion above, Rapleys respectfully request that the Council reconsider its position with regards to FIE and include the site as a housing allocation within the Draft Rochdale Allocations Development Plan Document.

Yours faithfully,

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Town Planning
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