

**REPORT OF PLANNING OFFICER (PARK DIRECTION)**

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**SUBJECT: RESPONSE TO WELSH GOVERNMENT CONSULTATION ON DRAFT TECHNICAL ADVICE NOTE (TAN) 23 ECONOMIC DEVELOPMENT**

Purpose of the report

To consider and approve the Authority's response to the Welsh Government's consultation on a new draft Technical Advice Note (TAN) 23 relating to Economic Development.

Background

Planning Policy Wales sets out the land use planning policies of the Welsh Government, supplemented by a series of TANs which together provide the framework for the preparation of the Local Development Plan and decision-making responsibilities of Local Planning Authorities.

The Welsh Government has published a draft Technical Advice Note to support planning policy on Economic Development set out in chapter 7 of Planning Policy Wales (November 2012). The TAN focusses principally on the provision of traditional employment uses B1 to B8.<sup>1</sup>

Draft TAN23

Whilst Chapter 7 of Planning Policy Wales emphasises the importance of recognising the whole economy's contribution to economic growth, the draft TAN focusses principally on the provision of traditional employment uses B1 to B8.

Local Development Plans are required to be based on a robust evidence base and the TAN proposes that the structure of this evidence in relation to economic development consists of 2 parts:

- A broad overview of the whole economy to inform an economic vision for the plan; and
- A closer analysis of B Class uses to inform detailed policy.

The evidence should be provided firstly by a regional study and then by local study incorporating an Employment Land Review. (The details of this requirement will be published in separate guidance later in the year).

The need to set the development plan's economic vision will also require regional grouping of Local Authorities. It is suggested that the regional groups should

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<sup>1</sup> Class B1 BUSINESS USE including offices (other than those falling in Class A2), research and development, and industrial processes, provided the use could be carried out in any residential area without detriment to amenity by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit. Class B2 GENERAL INDUSTRIAL process other than one falling into Class B1. Class B8 STORAGE AND DISTRIBUTION warehouses including wholesale cash and carry.

undertake an analysis of the dynamics of the commercial and industrial property markets and prepare future economic scenarios based on past trends identifying employment change by sector and land use. With scope to justify local differences, the resultant evidence base is intended to inform mutually consistent economic vision across the regional grouping.

The TAN requires assessment of economic benefits associated with allocating sites and determining planning applications for economic development. Where such an allocation or proposal could raise environmental or social concerns, the TAN proposes an approach posing 3 questions:

- Are there alternative sites for the proposal?
- How many direct jobs will result from the proposal?
- Would such a development make a special contribution to policy objectives?

As with all allocations, sites should not be identified if there is little prospect of future development. The TAN also sets out criteria to consider proposals to release existing B1 – B8 sites for other uses.

### **RECOMMENDATION**

**That Members approve the attached consultation response to the Welsh Government's consultation on Technical Advice Note 23 Economic Development.**

#### Background papers:

Draft Technical Advice Note 23 Economic Development

<http://wales.gov.uk/docs/desh/consultation/130610tan23-consultation-annex-1-en.pdf>

*(For further information, please contact Sarah Middleton on extension 4863, or by e-mailing [sarahm@pembrokeshirecoast.org.uk](mailto:sarahm@pembrokeshirecoast.org.uk))*

*Author: Sarah Middleton, Planning Officer (Park Direction)*

*Consultees:*

## CONSULTATION FORM

### Draft Economic Development Technical Advice Note

We want to know your views on the proposed changes to the Welsh Government's planning policy for economic development.

Please submit your comments by **5<sup>th</sup> September 2013**

If you have any queries on this consultation, please email:  
[planconsultations-A@wales.gsi.gov.uk](mailto:planconsultations-A@wales.gsi.gov.uk) or telephone: 029 2082 1673

#### Data Protection

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

#### Confidentiality

Responses to consultations may be made public on the internet or in a report.

**If you do not want your name and address to be shown on any documents we produce please indicate here**

**If you do not want your response to be shown in any document we produce please indicate here**

## CONSULTATION FORM

| <b>A Draft Economic Development Technical Advice Note (Consultation)</b> |  |                                     |
|--|--|-------------------------------------|
| <b>Date June 10<sup>th</sup> 2013 - September 5<sup>th</sup> 2013</b>    |  |                                     |
| <b>Name</b>  | Sarah Middleton  |                                     |
| <b>Organisation</b>  | Pembrokeshire Coast National Park Authority  |                                     |
| <b>Address</b>   | Llanion Park, Pembroke Dock, Pembrokeshire. SA72 6DY   |                                     |
| <b>E-mail address</b>  | sarahm@pembrokeshirecoast.org.uk   |                                     |
| <b>Telephone</b>   | 0845 345 7275  |                                     |
| <b>Type</b><br><i>(please select one from the following)</i>             | Businesses   | <input type="checkbox"/>            |
|  | Local Planning Authority   | <input checked="" type="checkbox"/> |
|  | Government Agency/Other Public Sector  | <input type="checkbox"/>            |
|  | Professional Bodies/Interest Groups  | <input type="checkbox"/>            |
|  | Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations) | <input type="checkbox"/>            |
|  | Other (other groups not listed above)  | <input type="checkbox"/>            |

|           |   |          |
|-----------|---|----------|
| <b>Q1</b> | <b><u>Larger than Local Planning (sec 1.14)</u></b>                                 | <b>X</b> |
|           | Do you agree with the assessment of strategic economic development in section 1.14? |          |
|           | <b>Agree</b>  | ✓        |
|           | <b>Neither Agree nor Disagree</b>   |          |
|           | <b>Disagree</b>   |          |

|  |                         |
|--|-------------------------|
| <b>Q1</b>  | <b>Further Comments</b> |
| <p>Whilst acknowledging that economic development is a frequently a strategic (cross-boundary) issue and agreeing that a properly-evidenced based Development Plan will benefit from a regional strategy, it is equally important that there is an adequate level of liaison between planning authorities and Regional Economic Development groups when such strategies are being developed.</p> |                         |

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| <b>Q2</b> | <b><u>Weighing Benefits (sec 2.5.1-2.5.7)</u></b>  | <b>X</b> |
|           | When considering a site allocation or planning application which may cause social or environmental harm do you agree with the three questions set out in the TAN that lpas should consider when weighing their benefits? |          |
|           | <b>Agree</b>   |          |
|           | <b>Neither Agree nor Disagree</b>  | ✓        |
|           | <b>Disagree</b>  |          |

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| <b>Q2</b>  | <b>Further Comments</b> |
| <p>In terms of the Local Development Plan, the process of site allocation should be informed by a Sustainability Appraisal (incorporating an Environmental Sustainability Appraisal). This comprehensive process will include economic development requirements and consider them in relation to the other requirements and issues that need to be taken into consideration and balanced. Planning applications will be determined using the resulting policies of the Plan.</p> <p>The 3 questions suggested here are matters that are regularly considered when determining planning applications for economic developments in the National Park. It remains that the answers to these questions are considered in a wider context of economic, social and environmental matters and the outcome in each case will depend on the weight given to each.</p> |                         |

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| <b>Q3</b> | <b><u>Rural Planning (sec 3.1- 3.6)</u></b>                         | <b>X</b> |
|           | Do you agree to the approach set out in relation to rural planning? |          |

|  |                                   |   |
|--|-----------------------------------|---|
|  | <b>Agree</b>                      | ✓ |
|  | <b>Neither Agree nor Disagree</b> |   |
|  | <b>Disagree</b>                   |   |

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| <b>Q3</b> | <b>Further Comments</b> |
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| <b>Q4</b> | <b><u>Development Plans and the Economy (sec 4.1)</u></b>   | <b>X</b> |
|           | Whilst the TAN provides an illustrative list of key stakeholders who should be consulted when preparing a development plan, are there others not referred to that it is important to mention? |          |
|           | <b>Agree</b>  |          |
|           | <b>Neither Agree nor Disagree</b>   |          |
|           | <b>Disagree</b>   |          |

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| <b>Q4</b> | <b>Further Comments</b> |
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| <b>Q5</b> | <b><u>Local Development Plan Evidence Base (sec 4.3 – 4.4)</u></b>                      | <b>X</b> |
|           | Do you agree with the approach described to collect data at a regional and local scale? |          |

|                                   |   |
|-----------------------------------|---|
| <b>Agree</b>                      | ✓ |
| <b>Neither Agree nor Disagree</b> |   |
| <b>Disagree</b>                   |   |

**Q5 Further Comments**

Whilst agreeing with the approach in principle, further comment is reserved until the detailed requirements are published.

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|-----------|--|----------|
| <b>Q6</b> | <b><u>Economic Vision</u> (sec 4.5 – 4.10)</b>                               | <b>X</b> |
|           | Do you agree with the explanation of what an economic vision should include? |          |
|           | <b>Agree</b>   | ✓        |
|           | <b>Neither Agree nor Disagree</b>  |          |
|           | <b>Disagree</b>  |          |

**Q6 Further Comments**

|           |  |          |
|-----------|--|----------|
| <b>Q7</b> | <b><u>Economic Scenarios</u> (sec 4.11 – 4.12)</b>   | <b>X</b> |
|           | Do you agree that strategies should include modelling of future economic scenarios based on an extrapolation of past trends and a stock take of current economic assets? |          |
|           | <b>Agree</b>   |          |
|           | <b>Neither Agree nor Disagree</b>  | ✓        |

|                 |  |
|-----------------|--|
|                 |  |
| <b>Disagree</b> |  |

**Q7 Further Comments**

The National Park would seek the guidance of Pembrokeshire County Council, as the Economic Development Authority on the preferred approach.

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|-----------|---|----------|
| <b>Q8</b> | <b><u>Employment Land Provision (sec 4.13 – 4.15)</u></b>   | <b>X</b> |
|           | Do you agree that authorities should work together to steer development to the locations which have the most sustainable capacity, even if this is beyond their own boundaries? |          |
|           | <b>Agree</b>  | ✓        |
|           | <b>Neither Agree nor Disagree</b>   |          |
|           | <b>Disagree</b>   |          |

**Q8 Further Comments**

|           |   |          |
|-----------|---|----------|
| <b>Q9</b> | <b><u>Existing Employment Sites (sec 4.25)</u></b>  | <b>X</b> |
|           | Do you agree with the five criteria for allowing existing employment sites to be released for other uses? |          |
|           | <b>Agree</b>  | ✓        |
|           | <b>Neither Agree nor Disagree</b>   |          |
|           | <b>Disagree</b>   |          |



**Q9**

**Further Comments**

**Q10**

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

**How to respond**

Please submit your comments by **5th September 2013**, in any of the following ways:

| Email  | Post   |
|--|--|
| <p>Please complete the consultation form and send it to :<br/><a href="mailto:planconsultations-A@wales.gsi.gov.uk">planconsultations-A@wales.gsi.gov.uk</a><br/>[Please include '<b>Economic Development TAN Consultation WG18851</b>' in the subject line]</p> | <p>Please complete the consultation form and send it to:<br/>TAN 23 Economic Development TAN Consultation<br/>Planning Policy Branch<br/>Planning Division<br/>Welsh Government<br/>Cathays Park, Cardiff<br/>CF10 3NQ</p> |

#### Additional information

If you have any queries about this consultation, please

Email: [planconsultations-A@wales.gsi.gov.uk](mailto:planconsultations-A@wales.gsi.gov.uk)

Telephone: Richard Spear on 029 2082 1673