



# **Bracknell Forest Local Plan**

Position statement giving details of monitoring of  
employment floorspace since base date of  
Bracknell Forest Local Plan (1<sup>st</sup> April 2020)  
and implications

January 2025



# Bracknell Forest Local Plan (BFLP)

## 1. Introduction

- 1.1 Whilst the base date of the BFLP is 1<sup>st</sup> April 2020, it was not adopted until March 2024. Due to the time lag, Position Statements were published during the examination process in December 2021 (LP/Ev/3m<sup>1</sup>) and November 2022 (LP/EV/30<sup>2</sup>). These documents helped explain the impact of completions and permissions granted during 2020-2021 and 2021-2022 on the overall supply of employment floorspace i.e. since the base date of the BFLP. Since those documents were published, a further two years of monitoring have taken place, the impact of which is summarised and explained below.

## 2. Context

- 2.1 Section 7 of the BFLP deals with Economic development. Employment development is dealt with as a component of economic development. It is defined as offices, general industrial, and storage or warehousing and distribution together with any Sui Generis uses that share a significant number of characteristics with those uses.
- 2.2 An Employment Land Needs Study (ELNS) was published in 2020 and summarises the needs for 2020 – 2036. If the figures are adjusted to align with the Local Plan period, which covers 2020 – 2037, the following figures are calculated:
- 19,125 sq.m of office space (Egi and Egii), and,
  - 48,875 sq.m of industrial and warehousing floorspace (Egiii, B2 and B8)
- 2.3 Planning permission is not required for a change of use from one Class E use to another, which makes it difficult to monitor changes between these uses to other Class E uses.

## 3. Changes

### Annual commitments exercise

- 3.1 As indicated above, the Council monitors net change in floorspace in different use classes on an annual basis. This provides details of floorspace that has been completed during the monitoring year and details of the amount of floorspace in the pipeline – both sites with planning permission (hard commitments) and those that have been accepted in principle but that are subject to the completion of legal agreements are covered (soft commitments).

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<sup>1</sup> <https://consult.bracknell-forest.gov.uk/file/5942881>

<sup>2</sup> <https://consult.bracknell-forest.gov.uk/file/6093331>

**Results of employment commitments exercises and impact on future employment needs since 31<sup>st</sup> March 2020**

3.2 The following table summarises completions that have occurred during monitoring years since the base date of the BFLP.

**Table 1. Amount of floorspace completed between 1st April 2020 and 31st March 2024 (net sq.m)**

	Office (Egi and Egii) <sup>3</sup>	Industrial (Egiii and B2)	Storage and distribution (B8)
Completed 2020-21	-5,839	-1,314	1,176
Completed 2021-22	-23,039	662	1,904
Completed 2022-23	-12,901	-37	29,870
Completed 2023-24	-7,772	665	-5,512
<b>Total</b>	<b>-49,551</b>	<b>-24</b>	<b>27,438</b>

3.3 **Table 1** shows that Egi/Egii floorspace has been lost over the period. This trend is of concern if it continues but reflects what is being experienced in the wider area. It’s likely to be due to many occupiers downsizing and/or consolidating their operations at one location, and/or exchanging quantity for quality of office floorspace. This tends to be due to the acceptance of hybrid working, with three office days a week becoming the dominant attendance pattern for many. Furthermore, challenging conditions in the investment markets have not helped investor confidence. This pattern of office losses is considered further in the context of Permitted Development Rights (PDR).

3.4 **Table 1** also shows that there has been a small net loss of Egiii and B2 floorspace along with a larger increase in B8 floorspace since the start of the plan period. This reflects the increase in demand for logistics and data centres. Please note that the B8 floorspace loss in 2023-24 is largely due to the redevelopment of a site at Downmill Road, Bracknell. This has resulted in the loss of -6,512 sq.m of floorspace through demolition in the 2023/24 monitoring year. It is being replaced with 9,446sq.m of warehousing that is still under construction. As such the loss is a matter of timing rather than a change in the general trend of an increase in B8 floorspace.

<sup>3</sup> Historically, the monitoring exercise covered B1 before more recently collected by the components of B1 (B1a, B1b and B1c) now Egi, Egii and Egiii, if available.

**Table 2. Identified need for employment floorspace at 1st April 2024 taking account of completions (sq.m)**

	Office (Egi and Egii)	Industrial (Egiii and B2) and Storage and distribution (B8)
Need identified for plan period 2020-2037	19,125	48,875
Completed floorspace 2020-2024 ( <i>impact on remaining need</i> )	-49,551	27,414
<b>Remaining need 2024-37</b>	<b>68,676</b>	<b>21,461</b>

3.4 **Table 2** shows the remaining need for the plan period having taken account of completions in the first four years of the plan period. This shows that the remaining need for offices (Egi and Egii) has increased significantly due to losses in office floorspace since the start of the plan period. The need for industrial (Egiii and B2) and storage (B8) floorspace has decreased by more than half.

3.5 Whilst the outstanding commitments indicate the potential for further changes, it is important to note that many of them were included in the ELNS baseline when the ‘need’ figures were calculated. It is therefore necessary to look at new permissions granted in the last four years (but that have not already been completed over the last four years since these will be incorporated within the figures in **Table 1**) and any changes resulting from lapsed or superseded permissions. These are set out in **Table 3** along with the residual balance of sites allocated in the Site Allocations Local Plan 2013 (SALP) and sites allocated in the BFLP.

**Table 3. Changes in outstanding commitments over the period 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2024 (net sq.m.)**

	Office (Egi and Egii)	Industrial (Egiii and B2)	Storage and distribution (B8)
Lapsed/superseded/alternative permissions in baseline 2020-2024 <sup>4</sup>	27,127	0	-517
New outstanding permissions granted 2020-2024 <sup>5</sup>	-26,762	-939	15,025
New sites accepted in principle subject to S106 Agreement	10,841	0	0
Residual balance of allocations in SALP	-19,426	0	0
Allocations in BFLP	25,960	0	0
<b>Total</b>	<b>-36,514</b>	<b>-939</b>	<b>15,542</b>

<sup>4</sup> Commitments that were previously in the baseline that had involved a gain in floorspace have been subtracted from the total (since the gain never occurred it adds to the overall need) whilst commitments that had involved a loss of floorspace have been added to the total (since the loss never occurred).

<sup>5</sup> Does not include completed permissions.

- 3.6 The loss of 27,127 sq.m of Egi floorspace from the baseline shown in **Table 3** was the extant permission for offices (09/00792/OUT and 10/00310/REM) at the former Hewlett Packard site. This involved two parcels of land as follows:
- 21,391 sq.m of office floorspace that was never been built at the main site and which was superseded by permission 21/00239/FUL for 9,443 sq.m of B8 which is complete.
  - 5,736 sq.m of floorspace that has never been built at the Island Site which has been superseded by permission (20/00947/FUL) for a 68-bed care home and 50 dwellings. This permission was granted following the allocation of the site for residential in SALP Policy SA2 Land north of Cain Road and is under construction.

**Table 4: Remaining need if changes in outstanding commitments and allocations are taken account of for in the period 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2024 (net sq.m.)**

	Office (Egi and Egii)	Industrial (Egiii and B2) and Storage and distribution (B8)
Need identified for plan period 2020-2037	19,125	48,875
Completed floorspace 2020-24 (from Table 2)	-49,551	27,414
Total outstanding commitments and allocations (from Table 3)	-36,514	14,603
<b>Remaining need 2024-37*</b>	<b>105,190</b>	<b>6,858</b>

\* Losses of office floorspace are added to the need for the plan period to generate a new 'remaining need'; gains in industrial, storage and distribution floorspace have been subtracted from the need for the plan period since this is a gain in floorspace to meet identified needs resulting in a reduced 'remaining need'.

- 3.7 BFLP Policy LP20 allocates sites for 25,960 sq.m. of office floorspace in and around Bracknell Town Centre.
- 3.8 Whilst there appears to be an over allocation of sites for offices in Policy LP20 compared with the original need for the plan period, it is evident from **Table 4** that the level of need is increasing due to planning permissions that involve loss of office floorspace.
- 3.9 The need for further industrial/storage floorspace has decreased substantially since the start of the plan period. Several speculative proposals have cumulatively reduced the remaining need identified in the BFLP. This trend is mirrored in the stock of floorspace in the Borough from the VOA (Valuation Office Agency). Whilst the data shows a loss of office floorspace during 2019/20, 2020/21 and 2021/22, a gain in industrial/warehouse floorspace during 2020/21 and 2021/22 is evident (see **Appendix A**), however the

floorspace decreased in 2022/23. The increasing interest in industrial/storage floorspace may be due to a general shift towards high-value manufacturing sectors such as computers, electronic and optical products and the growth in online retailing. Demand is also being influenced by the fact that warehousing is not just being used for the storage of goods, but, also the reworking, assembling, packaging and dispatch of items.

#### 4. PDR involving the change of use from offices to residential

- 4.1 Due to concern about the impact of losses of office floorspace on need, the issue of PDR<sup>6</sup> is considered further below.
- 4.2 Historic records can be used to look at the annual net change in floorspace in the B1 Use Class in Bracknell Forest since PDR was first introduced in 2013. It is also possible to identify the net change that results directly from PDR in respect of the change of use of offices to residential. The latter is the only form of PDR which has been taken up in Bracknell Forest on a significant scale, to date.

**Table 5: Net change in completed Eg floorspace overall and through PDR 2014-2024**

Year	All Eg net change (sq.m.) <sup>7</sup>	Egi net change through PDR (sq.m.)	% of net change represented by PDR
2013-14	-33,206	-1,290	3.9%
2014-15	-12,287	-3,674	29.9%
2015-16	-31,354	-1,423	4.5%
2016-17	-10,750	-6,679	62.1%
2017-18	-58,526	-100	0.2%
2018-19	-23,541	-8,525	36.2%
2019-20	-49,497	-39,984	80.8%
2020-21	-7,516	-5,708	75.9%
2021-22	-23,039	0	0%
2022-23	-12,938	-128	1%
2023-24	-9,432	0	0%
<b>TOTAL</b>	<b>-272,086</b>	<b>-67,511</b>	<b>25%</b>

- 4.3 The data in **Table 5** shows that there has been a net loss in Eg floorspace through PDR each year, and that it is making a significant contribution to the overall change in Eg floorspace. During the period 2013-14 to 2023-24, 25% of all Eg floorspace has been lost as a result of PDR representing -67,511 sq.m of office floorspace. The data shows that the proportion of Eg lost through PDR tended to increase over time, until 2021/22. This is due to changes to the permitted development rights introduced in August 2021 which restricted

<sup>6</sup> removing the need for planning permission for a change of use from offices to residential and replacing it with a system of prior approval where consideration can only be given to a narrow suite of matters

<sup>7</sup> includes Egi, Egii, Egiii and mixed E uses as breakdown of data not available for earlier years.

the floorspace that could be changed to 1,500 sq.m. However, this restriction was removed in March 2024.

**Table 6: Amount of Eg floorspace outstanding overall (including soft commitments) and with potential to be lost through PDR at 31st March 2024**

Year	All Eg <sup>8</sup> (sq.m.)	Egi PDR (sq.m.)
At 31 <sup>st</sup> March 2024	5,661	-25,924

- 4.4 The PDR total in **Table 6** relates to:
- 22/00602/PAC Lexham House, Forest Road, Binfield: loss of -118 sq.m. of offices to 2 flats;
  - 21/00763/PAC Atrium Court, The Ring, Bracknell: loss of -22,090 sq.m. of offices to 150 flats;
  - 21/00755/PAC Lily Hill House, Lily Hill Road, Bracknell: loss of -3,716 sq.m. offices to 33 flats.
- 4.5 The trend is being fuelled by the fact that residential values are often greater than office values. PDR appears to be affecting both vacant and occupied floorspace. The Council is concerned that PDR is eroding the amount of floorspace available to businesses and therefore having an impact on the number of job opportunities. As demonstrated, it is also making it more difficult to meet assessed needs for office space, even though the BFLP allocations appear to result in a surplus compared with the original need. This could impede economic growth and the sustainability of communities. Indeed, the Council's independent economic consultants have stated *"The lack of commercial motivation to promote new sites, coupled with the negative pipeline due to PDR losses of employment floorspace makes it challenging for Councils to demonstrate that they have a supply of office space for a full plan period."*<sup>9</sup>
- 4.6 The map in Appendix B shows the location of PDR schemes across the Borough. Those shown within the designated Employment Areas around Bracknell were agreed some time ago but have taken a while to complete. Several schemes have also been completed in and around Bracknell Town Centre.
- 4.7 An Article 4 Direction originally covered the three designated Employment Areas around Bracknell but due to legislative changes, ceased to have effect from 31<sup>st</sup> July 2022. At about the same time, revisions to the NPPF also raised the bar for when a local planning

<sup>8</sup> Includes Egii, Egiii and mixed Eg uses  
<sup>9</sup> [Technical Note: Bracknell Forest - Sub-regional Supply \(October 2021\)](#)



authority could make an Article 4 Direction. There is now a need to demonstrate that the Direction is essential to avoid wholly unacceptable adverse impacts. It should also be based on evidence and cover the smallest geographical area possible (para. 54 of the NPPF (2024)).

- 4.8 The Council reviewed whether a new Article 4 Direction was needed for the Borough's Employment Areas in 2022. At the time, it was concluded<sup>10</sup> that there was insufficient robust evidence available to support a new Article 4 Direction. This was partly because it was not clear what the impact of the introduction of the 1,500 sq.m floorspace threshold in 2021 would have. However, this threshold was removed in March 2024. It will be important to continue to monitor PDR applications and the need for a new Article 4 Direction.

## **Conclusion**

- 5.1 It is clear that there are challenges in the ability to meet needs in the Borough, especially for offices. It is critical that the designated Employment Areas are protected for employment uses. The fact that offices now fall within Use Class E which also includes shops, estate agents, cafés and restaurants, indoor sports facilities (including gyms), medical and health services, creches and day nurseries makes the situation even more complex in that there is no control in changes within this Use Class.
- 5.2 It is critical that employment opportunities within the Borough are not lost since that could cause harm to the local and the wider economy. Whilst demand for offices has decreased following the COVID pandemic, there are signs that businesses are requiring staff to return to the office on a full or part-time basis in the interests of increased collaboration, connection and mental health. Therefore, demand may return in the longer term, particularly for high quality office floorspace, and so sites must be protected, and new space provided if the assessed need is to be met.

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<sup>10</sup> [Article 4 Direction Area for Office to Residential Conversions Council Decision \(July 2022\)](#)

## Appendix A

The tables below provide data (published by the Valuation Office Agency (VOA)) on the overall stock of office and industrial floorspace in the Borough, together with the degree of change. Whilst they provide an indication of trends, the data is not directly comparable with BFC data. The stock of office floorspace declined by around 26% between 2017-18 and 2022-23. The stock of industrial/warehousing floorspace declined by around 6% between 2017-18 and 2022-23. This pattern was reversed in 2020-21 and 2021-22 with an increase in industrial/warehousing floorspace followed by a decrease in 2022-23. BFC monitoring indicates that the trend of increasing industrial/warehousing floorspace has continued during 2022-23. However, the VOA data below does not reflect this. This may be due to the time lag of the VOA recording changes in floorspace and the slight discrepancy in the time periods. Future monitoring will keep this under review.

**Table A: Total stock of office space in Bracknell Forest (VOA data)**

Period (financial year)	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
Total floorspace sq.m <sup>11</sup>	416,000	416,000	387,000	360,000	347,000	304,000
Change in floorspace %	-	0%	-7%	-8%	-4%	-12%

**Table B: Total stock of industrial/warehouse space in Bracknell Forest (VOA data)**

Period (financial year)	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
Total floorspace sq.m <sup>12</sup>	325,000	313,000	312,000	320,000	339,000	307,000
Change in floorspace %	-	-4%	-0.3%	2%	6%	-9%

<sup>11</sup> Data source: Non-domestic Rating: Business Floorspace, 2023 Valuation Office Agency  
[https://assets.publishing.service.gov.uk/media/6467499f0d6646000cd96310/NDR\\_Business\\_Floorspace\\_Tables\\_2023.xlsx](https://assets.publishing.service.gov.uk/media/6467499f0d6646000cd96310/NDR_Business_Floorspace_Tables_2023.xlsx)

<sup>12</sup> Data source: Non-domestic Rating: Business Floorspace, 2023 Valuation Office Agency  
[https://assets.publishing.service.gov.uk/media/6467499f0d6646000cd96310/NDR\\_Business\\_Floorspace\\_Tables\\_2023.xlsx](https://assets.publishing.service.gov.uk/media/6467499f0d6646000cd96310/NDR_Business_Floorspace_Tables_2023.xlsx)

## **Vacancy**

An article published by Vail Williams<sup>13</sup>, suggests that office vacancy levels were running at around 9.1% in November 2023. The Council does not have access to similar data for industrial/warehouse space.

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<sup>13</sup> Bracknell office market article: <https://www.vailwilliams.com/bracknell-office-market-emerging-from-readings-shadow/>

Appendix B

