

PLANNING STATEMENT

UNIT 21, SHORTWOOD BUSINESS PARK,
SHORTWOOD WAY, BARNSELEY, S74 9LH

APPLICATION FOR CHANGE OF USE FROM A B1, B2 & B8 UNIT TO
FLEXIBLE USE OF B1, B2, B8, D1 & D2

Prepared by Premier Technical Limited

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1. Introduction

This planning statement has been prepared by Premier Technical Ltd in respect of Unit 21, Shortwood Business Park, Shortwood Way, Barnsley, S74 9LH (Figure 1).

This statement is to accompany a planning application for a flexible change of use of Unit 21 to incorporate the already currently designated employment use alongside a new flight simulation experience and training centre.

This planning statement examines the planning context for the site and provides analysis of the development proposals. Accordingly, this report is structured as follows:

- Site context;
- Description of development;
- The proposed business;
- Planning policy context;
- Planning analysis;
- Sequential test; and
- Summary and conclusions.

2. Site Context

This application is made in respect of Unit 21, Shortwood Business Park, Shortwood Way, Barnsley, S74 9LH. This is a currently occupied unit in Barnsley close to J36 of the M1 and has floor space of 8,971 SqFt, with an eaves height of 5.5m. The building also has a 4m roller shutter door and dedicated car parking spaces.

The building currently has planning permission for employment uses B1, B2 & B8.

Figure 1 – Unit 21



The site is on a large industrial estate next to the A6135 and close to links to the M1. The recently developed Gateway 36 is also located approximately half a mile from the site, with companies occupying the site such as KFC, Taco Bell, Costa Coffee, Dunkin' Donuts & Greene King Dearne Valley Farm (pub and restaurant).

Planning History

The history of the development of the area is outlined below:

Reference	Description	Site Address	Validated Date	Decision	Status
2019/0568	Erection of steel framed building to provide yard cover	Unit 3, Shortwood Court, Hoyland, Barnsley, S74 9LH	28 May 2019	Approve with Conditions	Final Decision
2018/1269	Erection of 2.4m high perimeter security fencing and entrance gates and formation of new external loading door and windows on the existing building	Unit 1, Shortwood Court, Hoyland, Barnsley, S74 9LH	2 October 2018	Approve with Conditions	Final Decision
2015/0175	Erection of an industrial unit alongside existing industrial unit to house shot blast and jet washing bays	Unit 3, Shortwood Court, Hoyland, Barnsley, S74 9LH	25 February 2015	Approve with Conditions	Final Decision
2014/0162	Erection of building for light industrial development for use within classes B1(b) research, B1(C) light industry, B2 General Industry and B8 storage and distribution.	Shortwood Court, Shortwood Business Park, Hoyland, Barnsley, S74 9LH	10 February 2014	Approve with Conditions	Final Decision
2011/1379	Installation of photovoltaic panels to roof of building.	Units 2B and 2D Shortwood Court, Shortwood Business Court, Hoyland, Barnsley, S74 9LH	3 November 2011	Approve with Conditions	Final Decision
2010/1557	Erection of two factory/office units (Class B1, B2 and B8) (2008/0210 Extension of time limit)	Shortwood Business Park, Shortwood Court, Hoyland Barnsley, S74 9LH	17 January 2011	Approve with Conditions	Final Decision
2008/0210	Erection of two factory/office units (Class B1, B2 and B8)	Shortwood Business Park, Shortwood Court, Hoyland, Barnsley, S74 9LH	27 February 2008	Approve with Conditions	Final Decision

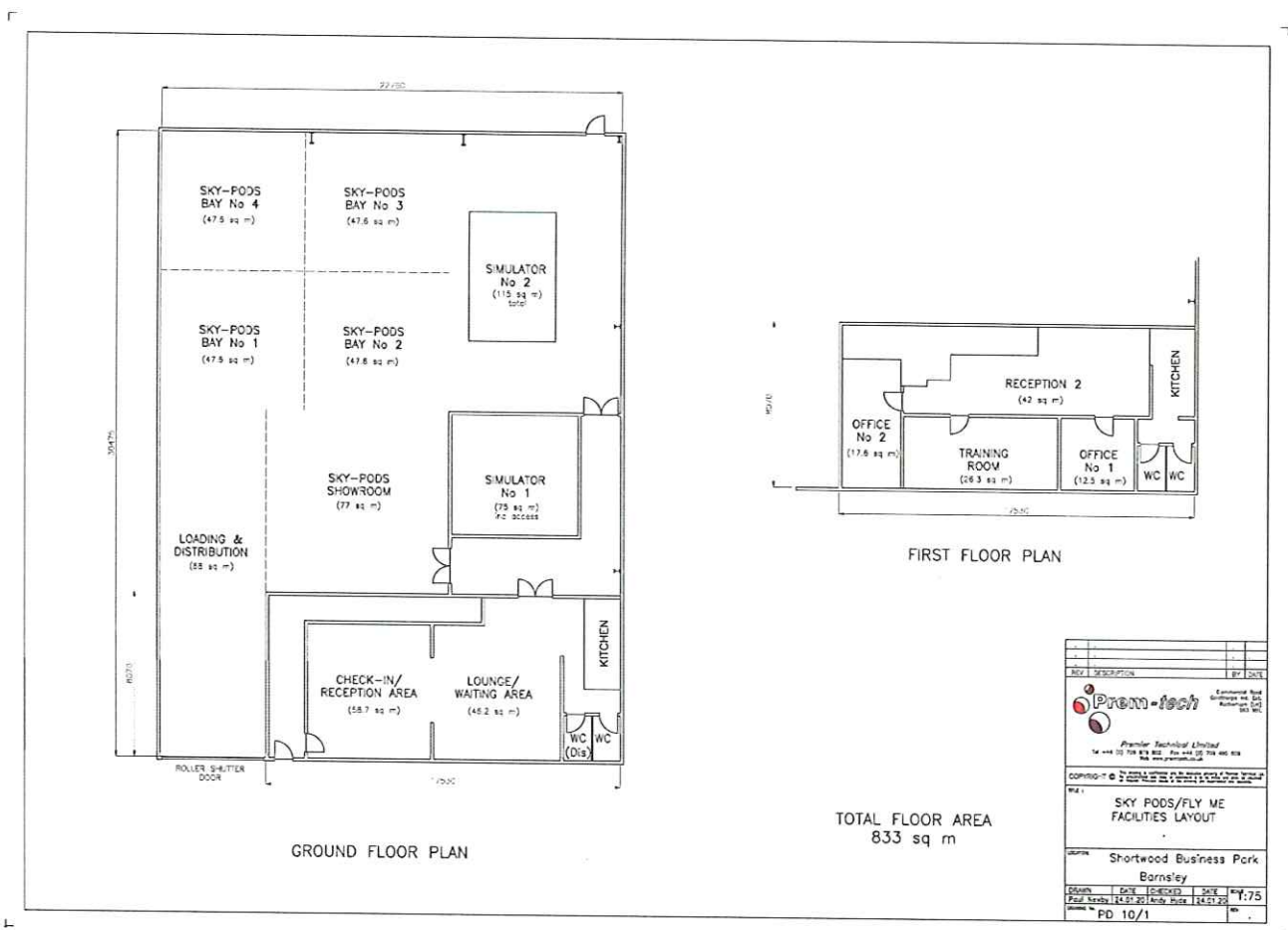
3. Description of Development

This planning application seeks approval for the following description of development:

Flexible change of use of part of the building from employment use (B1, B2 & B8) to a flight simulation experience and training centre (B1, B2, B8, D1 & D2).

The flexible change of use would enable the unit to revert back to the originally consented use (B1, B2, B8) without requiring further planning permission. Only a part of the building will be used for leisure and training use (D1, D2) with employment use (B1, B8) in the form of light industry, storage, offices and elements of research and development still forming a large part of the development proposal (Figure 2). If permission is granted, we anticipate that D1 and D2 use would cease on the applicant's vacation of the premises and would revert back to the original consented employment uses.

Figure 2 – Proposed Layout of Unit 21



It would also be suggested that the permission to change to a D1 and D2 use may relate solely to the change of use described in the application form and planning statement with no other uses falling within the D1 and D2 category required.

Additionally, no exterior changes are proposed to the building and the development will cause minimal impact to the outside areas of the unit. No permanent interior alterations are proposed with only removable and superficial alterations required in order to progress the development.

As the proposed changes are minor, we do not anticipate any impact on the environment, noise levels, or traffic to the area (save for one or two additional cars that may use the communal car park as outlined below).

4. The Proposed Business

Premier Technical Ltd is a successful and established manufacturing and sales business formed in 2009 and based at industrial premises in Goldthorpe. It has been supported since 2012 by BMBC's award winning Enterprising Barnsley which has allowed it to grow and flourish and to consider diversifying its services. The new venture is an opportunity to further build on their success and help promote BMBC's emerging inclusive growth strategy. FlyMe Ltd was formed in 2019 as a subsidiary of Premier Technical Ltd.

The business plan for FlyMe Ltd and the proposed use of Unit 21, Shortwood can be seen in Appendix 4 but the key points of it are as follows;

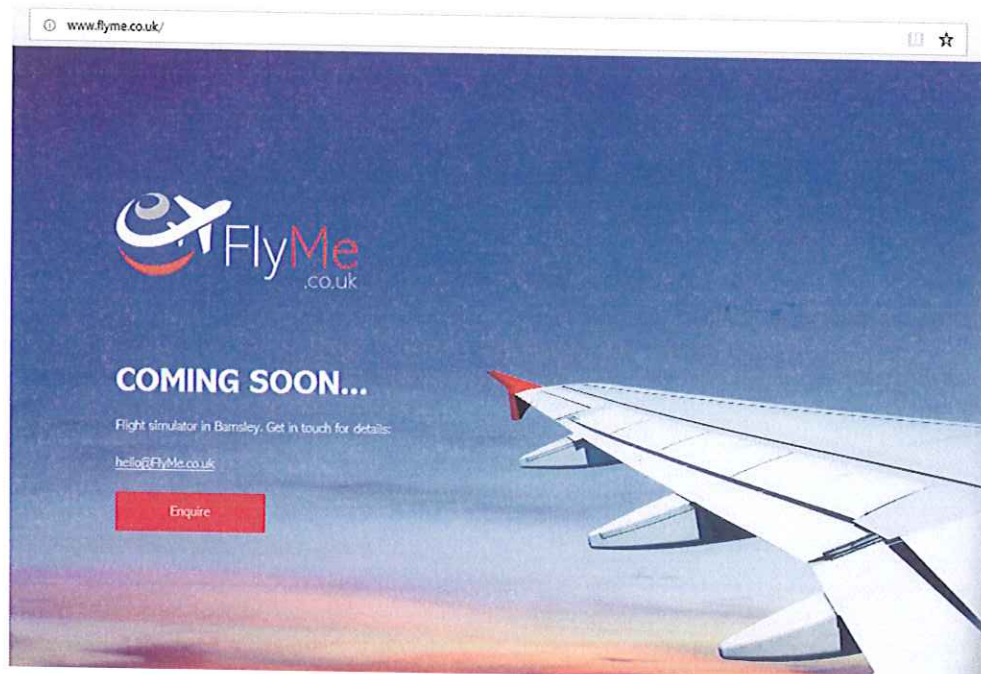
- FlyMe will be an immersive airport and flight simulator experience. It is proposed that the facility will primarily be for training, education and corporate purposes, with the intention being to open the facility to prospective pilots to assist with pilot interviews and flight training and also to local schools and colleges. In particular, it is envisaged that the facility will be used by local colleges offering cabin crew training for practical experience purposes and by schools for educational purposes and careers guidance. The facility will also be marketed towards corporate groups for team building type events.
- The entire facility will be a mock airport which will provide invaluable experience to travel and tourism students, from checking in to security processes with working scanners, to cabin crew and pilot training.
- In addition, the proposed attraction will give the opportunity for groups, organisations, families or individuals to take to the cockpit of real passenger aircraft using the latest simulation visual and motion technology.
- The business will be set in a themed airport environment using sounds, lighting, visuals and objects recreating the "theatre" and excitement associated with air travel. The airport will initially contain one fixed base Boeing 737 simulator and one former passenger aircraft, a Boeing 737 previously operated by a well-known commercial airline, which will initially be used as a viewing gallery whilst being developed to eventually provide a second, full motion simulator. It is proposed that the Boeing 737 aircraft will also be capable of hosting relevant training for cabin crew in conjunction with local colleges and schools with the intention of enhancing the local skill set and quality of courses offered.
- The business will employ 15 staff (9 FTE), bringing a new pool of skills to the area as well as increasing capacity (2 more full time staff) and job security at the Goldthorpe production facility. As the popularity of the attraction grows, it is anticipated that so will the required workforce. There will need to be an increase to the staff numbers outlined above as the second simulator opens to the public.
- As a unique visitor attraction to the UK, people are expected to travel from various locations around the country. With this in mind, the attraction will support the local economy in terms of accommodation, nearby food outlets, plus the chance for people to see other attractions in the Barnsley area during their visit. The location of the proposed business will assist greatly with Barnsley Metropolitan Borough Council's adopted Local Plan to develop the local Barnsley economy and support the current economic growth of the area after the development of Gateway 36.

- As well as public, the business will attract businesses and corporate clients to the area and showcase what Barnsley has to offer in terms of investment and innovation. As a local company run by local people, raising the gross added value (GVA) of the borough is an important consideration.
- The remaining part of the unit will be used to manufacture, finish, store and distribute "Sky Pods" made from recycled airplane parts (supporting the current B1 & B2 class use).

The business plan and proposal has the backing of the landlord of Unit 21, the bank (Appendix 5), Enterprising Barnsley and local MP and the Mayor of the Sheffield City Region, Dan Jarvis (Appendix 6) who is excited by the prospect of such a unique business and attraction looking to invest in the Barnsley Borough. Local colleges are also showing a preliminary interest in using the facility to enhance their training and course content. Fly Me has also been in discussions with Barnsley Council about how the facility could potentially be used to support local schools and their careers offering which has generated a significant amount of interest (Appendix 11).

Fly Me has taken delivery of the Boeing 737 aircraft and has purchased the assets of an existing flight simulator company and is now in a position to commence business once a suitable premises has been approved. The manufacture of Sky Pods has begun in line with the current designated class use and Sky Pods has actively promoted the products across social media and at the recent Grand Designs Live event. Websites are designed for both aspects of the business.

Fly Me is ready to commence operation and is awaiting a suitable unit to begin the recruitment process and get the business off the ground.



5. Planning Policy Context

National Planning Policy Framework 2019

The National Planning Policy Framework ("NPPF") provides details of national planning policy for England and Wales.

At the heart of the NPPF for decision making is the presumption in favour of sustainable development. For decision making, this means:

- where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - the application of policies in the framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

One of the NPPF's 3 overarching objectives for sustainable growth is:

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.

Paragraph 81 of the NPPF states planning policies should be flexible enough to accommodate needs not anticipated in the plan, and to enable a rapid response to changes in economic circumstances.

Paragraph 82 of the NPPF states planning policies and decisions should recognise and address the specific locational requirements of different sectors.

Paragraph 85 of the NPPF states planning policies should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary.

Paragraph 86 states that planning authorities should apply a sequential test to planning applications for main town centre uses.

Paragraph 87 of the NPPF states that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.

Barnsley Local Plan (2014-2033)

Policy E3 on The Barnsley Local Plan (BLP) set the allocation of employment land of which Shortwood Business Plan and the Shortwood Extension falls under (ES15 and ES16 and detailed on the map at Appendix 3). On such land the following designated uses are allowed:

1. Research and development and light industry (B1);
2. General industry (B2);
3. Storage and Distribution (B8).

Policy E3 also dictates that proposals for other employment generating uses may be considered on their merits, particularly in terms of providing jobs, skills and their contribution to the borough's GVA.

Paragraph 8.23 of the BLP then goes on to state:

"...provision is made on the majority of sites for a range of employment creating uses. These will be mainly uses falling within Parts B1, B2 or B8 of the Town and Country Planning (Use Classes) Order 1987. However, so that the process of widening the economic base and diversifying the local economy is not hindered, other job creating uses may be allowed."

Policy E5 is charged with Promoting Tourism in the borough and aims to do so by:

- Encouraging the provision of a wide range of venues and opportunities for cultural activity; and
- Encouraging the growth of the business tourism sector.

Paragraph 8.28 states the future development of tourism is an important issue in both urban and rural areas. Tourism has an important role to play in Barnsley's economy. We want to build on existing tourism potential of current attractions and to support and explore all opportunities to improve existing destinations and create new tourism and cultural attractions.

Infrastructure and Parking Supplementary Planning Document ("SPD") (2012)

The SPD supplements the Core Strategy Policy CSP 25 by setting out the parking standards the council will apply to all new developments. The maximum parking spaces per unit were determined at the original planning application for the site as a whole. This proposal has considered the maximum number of spaces permitted for each class of use the unit would be used for per the Regional Spatial Strategy (RSS) framework:

B1	22 spaces and 1 disabled bay
B2	11 spaces and 1 disabled bay
B8	8 spaces and 1 disabled bay
D1	7 spaces and 1 disabled bay
D2	30 spaces and 1 disabled bay

The proposed unit has three dedicated parking spaces and one disabled parking bay meaning it is at or below the maximum allowed spaces of any of the classes of use that permission is sought for. It should be noted that the unit itself is 833.4m² and so is well below the 2,500m² threshold requiring the aforementioned standards but for robustness and consideration of any potential environmental or traffic impact, this process has still been carried out.

However, this has to be balanced against the need for communal car parking in out of city centre locations. In addition to the four dedicated spaces, there is also a communal free car park assigned to the development with a further 66 spaces (many of which are empty during the daytime and almost all of which are empty during the evening and at the weekend).

The proposed site is an approximate 10-minute walk from nearby public transport (a distance of 0.5 miles to the nearest bus stop) which will assist the council's overriding objective to provide accessibility to the area through alternative means of transport other than by car as provided in the guidance in the Regional Spatial Strategy for Yorkshire and the Humber.

Planning Practice Guidelines ("PPG")

The PPG suggest it may not be possible to accommodate all forecast needs in a town centre; there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise.

The PPG goes on to state that:

"promoting development on town centre locations can be more expensive and complicated than building elsewhere, local planning authorities need to be realistic and flexible in terms of their expectations."

The PPG also suggest when planning for tourism, local planning authorities should:

- consider the specific needs of the tourist industry, including particular locational or operational requirements;

- engage with representatives of the tourism industry;
- examine the broader social, economic, and environmental impacts of tourism; and
- analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment.

Visitor Economy Strategy for Barnsley

According to this document, the vision for the visitor economy in Barnsley is that by 2020, Barnsley will be recognised as an emerging tourism destination and be seen as a place worth visiting. In order to deliver this, one of four priority areas is investment and providing high quality and distinctive experiences for visitors.

The visitor economy is one of the five priority economic sectors identified by the council and the strategy goes on to cement the need for creativity and imagination to provide experiences which appeal to 21st century visitors.

In an overall growing sector, other unique experiences in the borough have been doing well. The strategy document states, by way of example, that Elsecar Heritage Railway footplate experiences have increased by a staggering 84% demonstrating the value visitors place on unique experiences. There has also been an increase in numbers to other attractions in the immediate locality such as RPSB Old Moor.

It is also apparent that the new venture will further help to promote Barnsley as viable tourist location and will build upon the unique visitor experiences already obtained and will further help to attract wider regional, national and possibly international clients to help further increase the “day out” spend market which Barnsley is quoted as being well placed for. In addition, we anticipate that the business could also help to cater for the domestic overnight trips which Barnsley require to help booster average day spend.

The new venture will also be fully inclusive, helping to cater for all (both older and younger residents, who are interested in a meaningful experience) supporting social and inclusive growth.

We anticipate that the new venture will help to change the perceptions of Barnsley and the South Yorkshire brand on a regional and national scale. The company has set a significant marketing budget to facilitate this and is hopeful that it will be able to secure press coverage for its opening ceremony.

6. Planning Analysis

Principle of Development

The ancillary business use and the light industrial use and storage are already of permitted use and will make up around 50% of the development, while the D1 and D2 usage will create employment (Appendix 7) in its own right and bring additional skills to the area. The proposed additional D1 and D2 use shall be an employment generating use. Policy E3 of the BLP states proposals for other employment generating uses may be considered on their merits, particularly in terms of creating jobs, skills and their contribution to the borough's GVA.

The direct contributions are obvious from Council Tax (BMBC), Corporation Tax, VAT and PAYE along with rent to the landlord, but other financial contributions must be considered.

Creation of Employment

The jobs and associated level of jobs that the business will help to provide will help to make a telling contribution to the economic offer of the borough. As all the jobs created will be classed as "Better Jobs" which is a clear requirement for not only Barnsley's economic strategy, but its emerging inclusive growth strategy.

The proposed created jobs shall all pay above the National Living Wage and many will command a skills level of equivalent to at least NVQ level 3-4 with proposed salaries of £25,000 - £35,000 (FTE) which will assist in moving away from an unskilled economy. We also propose to create jobs that are flexible and family friendly and which involve working around school hours to assist people into work who may not be able to otherwise.

The company will promote the aspirations of Barnsley's emerging inclusive growth strategy by providing jobs at all levels (including skilled and unskilled jobs) and supporting in work training and progression.

As only part of the building will be used for D1 and D2 purposes, the level of employment required for the current B1 & B8 uses will remain static. Allowing the company to use part of the building for D1 & D2 would serve to create additional jobs, rather than stagnating the job creation that could have been possible under its previous B1 & B8 industrial use.

Education & Training

There is a gap in the market for aviation industry training at the present time. In particular, we are aware that local colleges have incurred significant expenditure in taking classes of students to Heathrow airport to be able to offer their students the hands on, practical training that is required as part of cabin crew training. Fly Me would like to be in a position to offer this as a lower cost local alternative. We have also had interest generated from schools in the Barnsley district and colleges in the wider area (West Yorkshire through to Teesside).

It is envisaged that Fly Me will be in a position to collaborate with existing initiatives such as the Air League. The Air League currently works with Barnsley council to give students an opportunity to learn more about the aviation and aerospace industries, including practical hands on experience of gliding and flying. Fly Me would aim to add to the Air League's current offering by providing additional

workshops on its premises giving students a unique opportunity to gain a better insight into the numerous different potential career branches of the aviation industry.

Furthermore, there is no local facility offering airline pilot interview preparation. The only business offering this in South Yorkshire recently ceased operating. Fly Me has been in discussions with a qualified airline pilot who has confirmed that he would work for the business to offer this training in the region. Entering the airline industry as a commercial pilot can often be extremely expensive, however there are airlines that offer the best candidates subsidised training costs. This could mean that prospective airline pilots in the region get better support and education and could therefore enjoy a lower cost entrance route into the industry. We hope that as a result, this will help to provide the next generation of potential airline staff with support that is currently unavailable in the region.

As the simulator will be a replica of a genuine Boeing 737 aircraft, the facility will be suitable for both new pilot training and refresher training for existing pilots.

Wider Economic Impact

It is also apparent that given the types of customers who would utilise the company's services that they would have a wider economic contribution to the economy through the use of hotels, restaurants, cafes and other local amenities and tourism and leisure sites as part of an enhanced day or overnight spend as per BMBC tourism strategy. By way of example, within a one mile radius of Unit 21 are a number of businesses who are likely to benefit from the creation of a flight simulator business through increased trade. This includes Dearne Valley Farm (restaurant), Greggs, KFC, Costa Coffee, Starbucks, Taco Bell and the Premier Inn hotel.

This promotes multiplier effect economics LM3 principles and promotes BMBC key objectives of developing a thriving economy. The development's occupation of the unit could also play the part of an anchor tenant for the business park, giving confidence to other businesses to let units there.

Approximately 8.7 million people live within 44 miles of Barnsley (the average distance travelled for day trips in England) which is a huge potential customer base of day trippers. Factor this by the £21 (economic impact of a day tripper) or the £38 for an overnight stay meaning a potential £183m or £330m revenue respectively brought to the area. As one in ten day trips include visiting a visitor attraction then the value of bringing this unique proposal to the borough cannot be underestimated.

On another application in the Barnsley area in an out of town development (Gateway 36, planning application 2014/1055) whereby a change of use was sought from Employment use (B1, B2 and B8) to non-employment land use (Sui Generis), a committee report found:

"Given wider objectives and the need to secure a planning permission that would help secure the funding for the four industrial units, it is considered that the conflict with the policy CSP19 (loss of employment land) is not considered significant. The proposal is therefore considered to be an appropriate employment-led, mixed use development"

It is noted that around 30% of the units at the Gateway 36 development are occupied by non-employment use businesses.

Further to this, the development in this proposal is part of another manufacturing business in the BMBC area. Premier Technical's manufacturing site in Goldthorpe (an area specified for support and growth in policy YH5C in the RSS) already employs nine full time and four part time members of staff plus two full time apprentices.

The development would also secure jobs at the Goldthorpe site at a turbulent time for British Steel as it may enable staff to transfer to the new business. British Steel (company no: 09438207) is in liquidation and makes up over 50% of Premier Technical's business turnover. If British Steel was to close or significantly reduce its operation, it is expected that up to six jobs would be lost. Retaining and transferring those skills across the production of both businesses would allow most if not all of those jobs to be retained in those circumstances.

With this in mind this development would create and secure significantly more jobs on the whole per Sq Ft (1 job per 636 Sq Ft) than many other permitted use businesses that could occupy the unit as outlined below:

Table 1 – B class unit Sq Ft per job created

Unit Address	Sq Ft per Job
Unit A Capitol Park	3,000
Unit C Capitol Park	7,500
R-Evolution J36	2,100
Helix R-Evolution J36	2,100
Unit 3 J38 Business park	4,000
Oaks Lane	9,300
Unit F & G Fallbank	1,700
Dearne Mills	6,300

The table below shows currently vacant units in Barnsley by usage class. It highlights that at present over 1,200,000 Sq Ft of vacant units are available for B1, B2 and B8 uses suggesting there is a healthy supply of empty units for this class of usage.

Table 2 – Vacant industrial units (per BMBC enquiry report as of November 19)

Property	Industrial				
	Units	%	Sqft	%	SqM per job
Up to 1,000 sq.ft	7	12%	3,676	0.4%	9
1,000 to 2,000 sq.ft	13	22%	20,735	2.0%	54
2,000 to 5,000 sq. ft	12	21%	40,297	3.9%	104
5,000 to 10,000 sq.ft	7	12%	55,188	5.3%	142
10,000 to 25,000 sq.ft	9	16%	143,194	13.9%	370
25,000 to 50,000 sq.ft	3	5%	113,877	11.0%	294
50,000+ sq.ft	7	12%	656,203	63.5%	1105
Total Property (% is of Property Enquiries)	58	45%	1,033,170		2078

The proposed development will also enhance the skills in the borough and help provide a facility for use by local colleges to attract students to the area. Barnsley College offers the NCFE Diploma/Extended Diploma in Travel and Tourism (Level 1, 2 and 3) that gives the student both a BTEC national diploma and Level 2 certificate in cabin crew training.

They also offer a HND in International Travel and Tourism Management through their university programme. Competition amongst colleges and universities to attract students to their courses is high

and a facility as unique as that proposed would enhance the quality and variety of the teaching as well as offering a unique learning experience for the students. We have provisional meetings lined up with Dearne Valley College and the Curriculum Lead for Sport, Public Services and Travel & Tourism for Barnsley College who are confident the facility would be a big attraction for students (Appendix 8). We have also met with Barnsley Council who have confirmed they would be interested in potentially using the venue for local schools and colleges (Appendix 11, Appendix 12).

Premier Technical Ltd currently offer apprenticeships at their Goldthorpe site and intend to continue this at the Shortwood site. In addition, the plan is to offer work experience placements to colleges and school students. It would be an exciting and varied place to work, being an educational facility as well as a tourist attraction and having the facilities to provide realistic airport and airplane procedures to enhance the students' learning and skills. By attracting students from out of town areas and retaining students in Barnsley, the GVA of the area is also increased as indicated in research by NEF consulting who commented:

"The Gross Value Added supported by student spending throughout the UK is of the order of £25 billion per annum. This represents 1.03% of UK GDP"

They went on to produce a table of expected spend by students in the local area per year. As can be seen in Table 3 below, the average higher education student spends £20,175.57 per year, much of it in the direct local area where the higher education institution is based. Students also bring in secondary multiplier effect revenue from family and friends who visit, plus it increases their likelihood to settle and work in the area.

Table 3 – Total demand generated by UK students

	Spending per student p.a.	Total spending p.a.
Food shop	£1,300.00	£3,245,632,000
Travel	£832.00	£2,077,204,480
Bars/pubs/clubs	£624.00	£1,557,903,360
Eating out	£572.00	£1,428,078,080
Alcohol	£572.00	£1,428,078,080
Clothes	£572.00	£1,428,078,080
Mobile phones	£520.00	£1,298,252,800
Course books	£520.00	£1,298,252,800
Course related equipment	£468.00	£1,168,427,520
Excursions	£416.00	£1,038,602,240
Non-alcoholic drinks	£416.00	£1,038,602,240
Cigarettes	£364.00	£908,776,960
Internet/Wi-Fi	£364.00	£908,776,960
Toiletries	£364.00	£908,776,960
Printing/photocopying	£364.00	£908,776,960
Stationery	£312.00	£778,951,680
Films/DVDs	£312.00	£778,951,680
Music/downloads	£312.00	£778,951,680
Rent	£5,991.57	£14,958,793,324
University fees	£4,980.00	£12,433,267,200
TOTAL	£20,175.57	£50,371,135,084

Source: nef consulting based on NUS data

Impact Statement

An impact assessment is not required in line with NPPF guidelines. However, paragraph 89 of the NPPF states planning policy should consider the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment.

This proposal would have minimal impact on the town centre's current and proposed leisure offerings. Due to its unique nature it would not take footfall from the town centre, indeed it would bring people to the area who would not otherwise have visited who will subsequently spend time in the centre, improving the town centre vitality. There are links to public transport networks (bus routes) around 0.5 miles away meaning excellent sustainable transport links for users to then spend time in the centre itself.

The proposed development will have a managed stream of visitors due to a booking system whereby there would be one user on each simulator at any given time slot. There would also only be a maximum of five staff on site at any one time due to the interchanging nature of the proposed employment matrix and therefore we anticipate that there will be a minimal impact on local parking. In any event there is significant parking available on the site and nearby. In terms of corporate clients, they will be encouraged to travel together by mini bus, train or car pooling to negate the limited parking spaces. Corporate clients, depending on where they have travelled from, may stay at a nearby hotel or eat at the local pubs and use the facilities for parking that they provide. Colleges and educational institutions sending students to use the facility usually provide group transport or promote public transport as many of the students cannot drive in that age bracket.

7. Sequential Test

Introduction

This proposal accompanies a planning application for a flexible change of use to incorporate some D1 and D2 use. Currently Unit 21 does not have planning permission granted for this type of use and per NPPF policy, this type of use is a “town centre use”. This proportionate sequential test sets out to assess in centre sites in terms of availability, suitability and viability.

- **Availability** – Whether sites are available. It should be noted that the NPPF requires that to be sequentially preferable, a potential alternative site must be “available” not “available in a number of years” as confirmed by the Secretary of State in his decision in June 2014 on a called in application at Rushden Lakes;
- **Suitability** – Whether a site could be developed for the proposal having regard to the requirement to demonstrate flexibility and whether the site is suitable to accommodate the specific need or demand the proposal is intended to meet;
- **Viability** – Whether there is a reasonable prospect that the development will occur on the site at a particular point in time, again having regard to the specific nature of the need or operator demand the proposal is intended to meet.

Relevant Case Law

The application of the sequential approach should also accord with the approach set down in established case law and Secretary of State decisions, in particular;

1. Supreme Court decision of *Tesco Stores Ltd v Dundee City Council* [2012] UKSC 13;
2. High Court decision of *Zurich v North Lincolnshire and Simons Developments* [2012] CO/4764/2012;
3. Secretary of State call-in decision at Rushden Lakes [2014] (appeal re. *APP/G2815/V/12/2190175*).

The key points are:

1. The sequential test relates entirely to what is proposed by the application and whether it can be accommodated on an actual alternative site, not some other proposal which the planning authority might seek to substitute for it which is something less than sought by the developer (*Dundee*);
2. The *Dundee* case is legally binding in that the sequential approach does not require a “suitable” site to be one that can only accommodate a proposal if the proposal is altered/reduced;
3. *Dundee* applies in England and even if the sequential test is not fully satisfied, the local planning authority is not required to automatically refuse permission – a balancing exercise is still required (*North Lincolnshire*);

4. Flexibility can be demonstrated by developers not seeking to maximise their footprint (Rushden Lakes);
5. The sequential approach is only concerned with sites that are available now (Rushden Lakes).

In light of the above, the pertinent question posed by the sequential approach is whether there are any suitable sites that are available now that could meet the size, format and market requirements of a flight simulation experience and training centre.

Other Cases

1. In 2016, BMBC granted planning permission (ref: 2016/0436) to allow a flexible use of Class D2 on an A1 site. This permission would revert back to the previously approved A1 only once the occupant no longer utilised the site, synonymous with this application and proposal. The committee report in June 2016 regarding that application stated that:

"The applicant has demonstrated that there are no sequentially preferable sites to accommodate the proposed development and that the proposal will not have a significant adverse impact on the Town Centre plan or the planned investment in the Better Barnsley Scheme. There is no evidence that the impacts of the proposal would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF as a whole. Accordingly, the presumption in favour of sustainable development applies and the application is therefore recommended for approval."

2. Similarly, in 2017 at Unit 5, Helix at Gateway, Birdwell, S70 5SZ, planning permission was granted to allow change of use from employment use B1/B8 to Sui Generis use as a car supermarket (ref: 2017/1611). This development is 3.3 miles as the crow flies from Barnsley town centre and the unit is 75,277 Sq Ft. This site is less than a mile away from the proposed Shortwood site. At the time of the application, the unit had reserved right planning permission for employment uses. Permission was granted on the basis that the new use would create jobs and negate the impact of the loss of a substantially sized unit designated to employment use. A training and employment plan was put into place which further ensured the employment of local members of staff.

Around 30% of the units in the Gateway 36 development have been allocated to developments that fall outside of the employment use class in order to stimulate sustainable economic development of the site. The committee found on the initial application (ref: 2014/1055) that:

"Given wider objectives and the need to secure a planning permission that would help secure the funding for the four industrial units, it is considered that the conflict with the policy CSP19 (Loss of employment land) is not considered significant. The proposal is therefore considered to be an appropriate employment-led, mixed use development."

3. An appeal to the Secretary of State heard on March 2016 (APP/C8310/W/15/3135864) where permission was initially refused to grant use D2 to an industrial unit with permitted B1, B2 and B8 use was successfully allowed. The inspector commented that the development would create a number of jobs, thus negating the negative impact on the loss of an employment land unit. They also commented that:

"Also of significance is advice in the NPPF that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and that planning should not act as an impediment to it. Significant weight should be placed on the need to support economic growth through the planning system and in this case I place significant weight on that factor."

In her comments, the inspector noted that the unit had not been empty for an excessive amount of time and was considered a prime industrial unit for employment use.

Site Search Parameters

A sequential approach to site selection has been applied in this proposal, taking on board the relevant court decisions and Secretary of State and appeal decisions.

Due to the large catchment area of the business, a number of potential town centre locations have been considered. Specifically, a flight simulator experience centre has very specific requirements. To be considered to be suitable, the unit must have:

- A large open plan floor space of at least 5,000 square feet to accommodate:
 - A full sized Boeing 737 airplane cockpit on a motion platform with safe operating space including an 8 metre airplane section;
 - A reception area;
 - Office and operations space;
- Appropriate ceiling height to house the aforementioned equipment;
- Loading door capable of fitting in large airplane sections (a width of at least 4 metres);
- Easily accessible location for visitors and delivery of goods;
- Within a reasonable distance of sustainable local transport links for staff and visitors;
- Sufficient and free on-site parking;
- Clean and aesthetically sound internally and externally due to experience part of the business model (Grade A unit).

In addition, due to the operational demands of the business plan and proposal, the search parameters have been narrowed appropriately. Appendix 9 shows a radius reachable within a 30 minute drive time and a reachable area within 60 minutes on public transport from the Shortwood estate which demonstrates the vast catchment area of the proposed business. In addition, Premier Technical's base at Goldthorpe falls squarely within the proposed reasonable commuting time.

This established search radius is important for a number of reasons:

- Staff based at Goldthorpe will be multi skilled and may be expected to travel between sites (Premier Technical's current base is less than 30 minutes' drive away). Increasing their commute is not cost effective for the business, nor is it fair on staff to expect them to travel for any substantial length of time.
- To move the development any further from Premier Technical's base (near where most current staff live) would also reduce the likelihood of staff travelling by sustainable means which is something being encouraged on the development.
- The flight simulator will rely on very technical and specialist equipment and software. The business model relies critically on a member of technical staff being able to reach the facility

in the shortest possible time due to part of the business being in the education and experience sector.

- We want the simulator to be accessible to as many people as possible. The location next to J36 of the M1 extends the potential client base significantly and covers a number of schools and local colleges (for example Barnsley and Dearne Valley).

This parameter search identified town centres satisfying the initial criteria of proximity as Doncaster, Rotherham, Barnsley and on the outskirts, Sheffield.

In terms of competition of what is available in each of these towns, Sheffield previously had a flight simulator but this recently ceased trading. Doncaster has a flight simulation experience available on a commercial level (Jet Simulator) and Barnsley has a flight simulator experience run from an individual's home (Britannia). However, neither simulator is offered as an educational or corporate facility, nor do they offer pilot training. In addition, the proposed business is unique as it encompasses a full airport experience and motion simulator, which neither of these businesses offer.

Similarly, those towns bring large and popular leisure alternatives in the form of Doncaster Dome, Magna, Ice Sheffield, Meadowhall, Sheffield Arena and Yorkshire Wildlife park amongst others. Looking forward then the new Gulliver's Valley theme park at Rother Valley will also be located as such that it will draw visitors primarily from the towns of Rotherham, Sheffield and Doncaster with Barnsley less directly affected.

Premier Technical also have a long history of working with Enterprising Barnsley and their support has been and continues to be valuable to the viability of the current and future business expansion. Due to the combination of the above factors, Barnsley becomes the clear choice location on an operational and commercial level and fits with the business plan and model of the proposal. For this reason, the other considered town centres are unsuitable without changing or altering the business proposal and do not meet its marketing requirements, which to reconsider *Dundee* confirms that the sequential approach does not require a "suitable" site to be one that can only accommodate a proposal if the proposal is altered/reduced.

Notwithstanding this, a property search has been conducted for either town centre or out of centre leisure units in Rotherham, Sheffield and Doncaster and none were available at the size, quality, layout and accessibility required. These centres failed the sequential test for availability, suitability and viability on the very specific needs of this proposed business.

It is also necessary to identify the sequentially preferable centre of corporate clients. Corporate clients form a large part of the business plan for this development. Although the catchment area on the whole is large, the majority of the local corporate clients will come from the financial centres of Sheffield and Leeds. Barnsley is 30 minutes by car and 24 minutes by train from Sheffield and 30 minutes by car and 32 minutes by train from Leeds, making it almost exactly equidistant between the two. This makes it ideally situated to equally attract corporate clients from both these cities.

If the proposed business was to be situated in Sheffield, Doncaster or Rotherham, at least one of those travel times doubles and from a marketing, commercial and accessibility standpoint the business plan and viability weakens significantly.

Consideration must also be placed strategically on the proposed introduction and route of HS2 for rail travel. For corporate clients and individuals coming from major cities outside of Yorkshire, being as

well connected as Barnsley is to both Leeds and Sheffield which will have stops on the service is a major factor for encouraging and attracting visitors by sustainable travel in the future.

Due to the combination of all of the above, without altering the business proposal or sacrificing the viability of the business model, Barnsley town centre is the only sequentially preferable centre for this proposal.

The overall aim and objective of the proposal is to provide the residents of Barnsley with an educational and leisure facility to be proud of and attract interest in the local area. It will not only provide a facility unique to the locality but also a significant attraction for day trippers and people beyond the region to have a further reason to visit. It will also attract businesses and corporate clients which in turn will showcase what the area has to offer and provide further scope for inward investment to contribute to the GVA of the borough. There is no other fully comparable facility to the development proposed in the UK.

Given the aim and objective of the proposal, particularly the scale and layout of the facility that would be necessary, the search parameters of the sequential test should be to look for large open plan units of sufficient height with appropriate car parking, access and services.

Barnsley Town Centre Sites

The below table summarises the conclusions for the sites included in the BLP 2019. None of these sites have unallocated proposals for leisure use.

Table 4 – Barnsley town centre sites

Site	Available?	Suitable?	Viable?	Conclusion
The Glassworks	x	x	x	Leisure space to include cinema, restaurants, bars. No units of the size and scale required and access for deliveries is difficult.
Heelis Street/New Street	x	x	x	The site has consent for a food store. There are also issues with the topography.
Land between the transport interchange and Harborough Hill	x	x	x	Not ready or developed and allocated for a mixture of uses including ancillary retail. The planning history suggests it is not viable.

None of the sites allocated for retail or leisure within the BLP are sequentially preferable to the application site for the proposed development.

Vacant Units within Barnsley Town Centre

Vacant sites/units in the town centre have also been taken into consideration. An independent search plus a thorough search through Enterprising Barnsley's catalogue of properties (Appendix 10) showed no suitable units are currently available in the areas designated as town centre or edge of town centre on the BLP 2019. The following table shows the units available regarding leisure or alternative use provided by Enterprising Barnsley:

Table 5 – Barnsley town centre units

Site	Available?	Suitable?	Viable?	Size
Former Salvation army Citadel – S70 1SS	Yes	x	x	3,691 Sqft
Former Treadles Wine Bar – S70 2RN	Yes	x	x	1,227 Sqft
29-31 New Street – S70 1RZ	Yes	x	x	3,183 Sqft
2 nd Floor 20/22 May Day Green –S70 1SH	Yes	x	x	2,484 Sqft
Wellington House – S70 1SW	Yes	x	x	3,000 Sqft
Church Street - S70	Yes	x	x	3,229 Sqft

All of the above sites are confirmed by Enterprising Barnsley as being unsuitable due to the quality, size, structural layout or design of the buildings which are insufficient to meet the needs of this development. They also go on to say that no other urban principle site could be considered due to the small nature of the remaining units being under 2,000 Sqft.

For robustness of the sequential test, this proposal also considered other Grade A industrial units taking into account all the district centres (Cudworth, Hoyland, Wombwell, Goldthorpe, Penistone, Royston) and local centres (Athersley, Bolton on Dearne, Darfield, Darton, Dodworth, Grimethorpe, Hoyland Common, Lundwood, Mapplewell, Stairfoot, Thurnscoe). There is nothing available, suitable or viable in the "centre" of any of these options with only 1 A Grade unit between 5,000 and 10,000 Sqft in the entire borough per the table below.

Table 6 – Available units by quality

Size of unit	Number of Units	Grade A	Grade B	Grade C
Up to 1,000 sq.ft	1	1	0	0
1,000 to 2,000 sq.ft	5	4	0	1
2,000 to 5,000 sq.ft	6	0	1	5
5,000 to 10,000 sq.ft	9	1	2	6
10,000 to 25,000 sq.ft	7	2	3	2
25,000 to 50,000 sq.ft	2	1	1	0
50,000+ sq.ft	3	2	0	1
Total	33	11	7	15

The 1 available unit is Rock House in Cudworth (significantly outside the town centre), which at 10,000 Sqft is too large for this proposal and is currently a retail unit with no open plan floor space and no suitable loading door. It also has insufficient eaves height so fails the sequential test on the grounds of suitability and viability.

The Grade B and C units in the 5,000 to 10,000 Sqft category are also not suitable for this development.

Conclusion of the Sequential Test

To be sequentially preferable a site must be suitable, viable and available. Premier Technical's requirements are a large open plan unit of circa 7,000 SqFt with high eaves, a 4 metre loading door, easily accessible, good transport links and with a certain aesthetic quality with a reasonable rental cost. The conclusions for all of the identified sites are:

1. For operational, commercial and marketing reasons, a parameter was set out inside a 30 minute drive time and 60 minute public transport journey time of Premier Technical's Goldthorpe facility that identified the towns of Barnsley, Rotherham, Doncaster and Sheffield.
2. Due to competition of other leisure offerings falling within distance and travel time parameters of key operational details and previous experience and support in the marketplace, Barnsley was established as the only sequentially preferable centre for the proposal.
3. Vacant units and allocated development sites in the centre of Barnsley have been considered and none are suitable, viable or available.
4. Developments such as the Glassworks and Barnsley Market developments are not yet complete and are an unrealistic option on the grounds of suitability, plus have already signed pre agreements with many tenants offering leisure facilities (e.g. Cineworld).
5. In light of Dundee, none of the sites considered can be classed as suitable for this unique proposal in the format it is proposed.
6. The overall conclusion is that the application site is by far the most sequentially preferable location for the proposed development. We consider that the proposal therefore accords with the parameters set out in the NPPF and BLP policies.

8. Summary and Conclusions

This proposal has been submitted in support of a planning application by Premier Technical Ltd to provide a flight simulation experience and training centre at Unit 21, Shortwood Business Park, Shortwood Way, Barnsley, S74 9LH. It seeks a flexible change of use for part of the unit from employment uses (B1, B2, B8) to additionally allow training (D1) and leisure (D2) to take place in part of the building.

The proposal will assist local schools and colleges with their curriculum relating to the aviation industry and to careers options generally and will vastly improve the leisure offering in Barnsley and the wider area whilst providing a major and unique attraction to increase the number of visitors and students and promote localised economic expenditure, thus improving the GVA of the borough.

The statement has reviewed planning policy for the site and the proposed use and assessed the proposal against the relevant development management policies contained in NPPF guidance relating to leisure developments and the most relevant leisure and town centre policies in the BDP. It has also considered advice from the PPG, the Parking SPD (Particularly CSP 25) and the economic and leisure strategies of the borough.

The main points to address are as follows:

1. Does the proposal meet the economic objectives of the BDP and the NPPF?

The proposal meets the economic objectives for Barnsley as outlined in the adopted BLP and those outlined in the NPPF, because it will create and help retain a significant number of jobs and facilitate direct investment in the area. It will also support and enhance an already established business that makes a significant contribution to the area's GVA. The development will still be utilising employment land uses B1 and B8 in the unit and the D1 and D2 training and leisure uses will also produce employment and not compromise the employment generation of the building's current use. Indeed, the job per Sq Ft ratio produced will be higher than some current B use occupants. There will be further multiplier effect contributions to GVA from supply chain and the attraction of students.

2. Does the proposal enhance the borough's leisure and tourism offer?

The proposal will give the borough a unique attraction to be proud of. It will not only give the people of Barnsley a greater choice of leisure activity but also attract day trippers and corporate clients from outside the borough and subsequently put Barnsley on the map. The development directly addresses three key weaknesses identified in the SWOT analysis of the Visitor Economy Strategy for Barnsley:

a) Whether there are any preferable centres or town or edge-of-centre sites that are available and suitable for the proposal.

Barnsley is the only sequentially preferable centre for the development. Other centres were considered but for commercial, operational and marketing reasons were not suitable or viable. A search of units in those centres also showed they failed in terms of availability. The application site is the only unit possible for this development in Barnsley. In light of the case law established by *Dundee*, sites in Barnsley town centre could not address the same requirements as Shortwood in helping provide the area with a leisure offer that can be genuinely unique to Barnsley. Following a

thorough search for alternatives and confirmed by Enterprising Barnsley, there are no other sites, central or otherwise, able to meet the demands of this proposal which satisfy the tests of availability, suitability and viability. The sequential test is therefore passed.

b) Whether there is any clear evidence of significant adverse impacts?

The proposal will not lead to a significant adverse impact on existing, committed or planned public and private investment, namely the Better Barnsley scheme for the redevelopment of the town centre markets, nor will it result in a loss of town centre trade. Conversely, due to its proximity to the centre, it has the possibility to increase visitors to the area who will visit the town and use other facilities in the centre and beyond and so support other schemes that aim to provide economic growth. There will be no material significant impact on the noise, traffic or pollution of the area.

c) Whether the balance of impacts and other material considerations are acceptable, having regard in particular to the NPPF advice that developments should be approved unless any adverse impacts would significantly outweigh the benefits?

The proposal will deliver other material benefits including;

- i) Enabling investment** in the locality in the form of delivering a new leisure destination attracting visitors, key business decision makers and students to the area to spend money and invest.
- ii) Increased local employment and spending adding to the GVA of the borough.** The NPPF states that *"significant weight should be placed on the need to support economic growth through the planning system"*. It follows that everything must be done to support the economic regeneration of the development without delay. The proposal represents an opportunity for the council to support sustainable economic growth and job creation in line with the Jobs and Business Plan vision.
- iii) Supporting quality training courses** in the area to bring new skills and employment opportunities to the area and its residents, enriching what Barnsley can offer. Premier Technical has a reputation of upskilling and progressing staff, investing in apprentices and skills-based training. There will be opportunities for work experience and leisure-based apprenticeships as well as providing a first class facility for local schools. Two local colleges have already expressed provisional interest in the facility. There will also be an opportunity for airline interview preparation delivered by a qualified commercial pilot which is not currently offered in the South Yorkshire area.
- iv) Supporting manufacturing** by strengthening job security and facilitating extra employment and apprenticeship opportunities. Premier Technical has invested in the area with new machinery, growth of manufacturing facility and the global export of products.

3. Does the proposal raise any significant adverse impacts with accessibility and transport?

Due to its location just off the motorway and away from housing, plus the limited number of visitors at any one time, there are no significant adverse impacts with transport and accessibility.

The development satisfies CSP 25 with private and safe parking spaces including a disabled bay to accommodate the well managed visitor numbers who wish to drive.

It is evident from the proposal that we consider the application should be supported as there are no material considerations that the application should not be approved. The overall conclusion is therefore that the policy advice contained in the NPPF, the policy of the Barnsley Local Plan, the numerous economic strategies of the region and the various case law and successful local applications and appeals to the Secretary of State adds substantial weight to the presumption that planning permissions should be approved without delay.