



Policy LP5 Delivering Prosperity and Jobs Evidence Report

**Proposed Submission
April 2016**

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1 Introduction

- 1.1 A joint Local Plan for the Central Lincolnshire area is being produced which will set the framework for how development will be considered across the districts of the City of Lincoln, North Kesteven and West Lindsey to 2036.
- 1.2 This Evidence Report (which is one of a collection) provides background information and justification for policy LP5: Delivering Prosperity and Jobs. The policy will form the starting point for determining planning applications for employment development, and includes allocations of employment land.
- 1.3 The four authorities which make up Central Lincolnshire have also identified in their Corporate Plans the desire to increase employment opportunities through economic growth. This will be delivered primarily through the Local Plan.
- 1.4 This report provides background evidence which underpins the employment elements of the Local Plan and explains the methodology used in deciding what approach is right for Central Lincolnshire and how sites were selected for allocation. It summarises elements from other key pieces of the evidence base and provides necessary context to justify the proposed approach.

2 Context

- 2.1 The NPPF (2012) sets out the Government's requirements for how employment policy should be shaped in Local Plans. The importance of economic development is emphasised by the first section in the NPPF being titled: **Building a strong, competitive economy**. This section is set out in full below (paragraph nos. as in the NPPF).

Extract from the NPPF:

- 18 *The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.*
- 19 *The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.*
- 20 *To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.*
- 21 *Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:*
- set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;*
 - set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
 - support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;*
 - plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;*

- identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and
- facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

22 *Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.*

2.2 Also relevant to the extensive rural areas in Central Lincolnshire is para. 28, which states:

Extract from NPPF:

28 *Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:*

- support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;
- promote the development and diversification of agricultural and other land-based rural businesses;
- support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and
- promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

2.3 The section on Plan Making sets out the key requirements for producing Local Plans. Paragraphs 154 and 160-161 are perhaps most relevant and state that:

Extract from NPPF:

154 *Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.*

160 *Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should:*

- work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and
- work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.

161 *Local planning authorities should use this evidence base to assess:*

- *the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;*
- *the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land;*
- *the role and function of town centres and the relationship between them, including any trends in the performance of centres;*
- *the capacity of existing centres to accommodate new town centre development;*
- *locations of deprivation which may benefit from planned remedial action; and*
- *the needs of the food production industry and any barriers to investment that planning can resolve.*

2.4 The National Planning Practice Guidance (NPPG) was introduced in 2014 and it sets out live guidance on how to implement the policies of the NPPF. At the time of writing perhaps the most relevant elements of the PPG relate to guidance on carrying out needs assessments for economic development.

3 Central Lincolnshire Context

3.1 The three Central Lincolnshire Local Authorities are served by the **Greater Lincolnshire Local Enterprise Partnership (GLLEP)**. It has managed to secure financial support from Government as part of the Growth Deal as well as assist with setting up of a Food Enterprise Zones (see later for further details) based in Central Lincolnshire. The GLLEP has identified a number of key growth sectors within the local economy which can be exploited for the benefit of Greater Lincolnshire and ultimately grow the economy and create employment opportunities. These sectors are:

- Renewables
- Care Services
- Visitor economy
- Ports & Logistics
- Manufacturing
- Agri-food (which encompasses primary production, food processing and farm diversification)

3.2 The GLLEP has produced a **Strategic Economic Plan (SEP)** which outlines investment priorities across the GLLEP area. It also sets out high-level growth targets which need to be considered. The SEP sets out ambitious targets for the entire GLLEP area (i.e. a greater area than just Central Lincolnshire) to achieve the following by 2030:

- Create 13,000 new jobs
- Support 22,000 businesses
- Increase the value of the Greater Lincolnshire Economy by £3.2m
- Deliver up to 100,000 new homes

3.3 Central Lincolnshire is located within the GLLEP and represents roughly 30% of the area's population, employment and business base. The Central Lincolnshire authorities have a role to play in the delivery of these targets and therefore they have been reflected in the approach to employment policy for the Central Lincolnshire Local Plan.

- 3.4 To support the Central Lincolnshire Local Plan, an Economic Needs Assessment (ENA) has been prepared (Turley, in partnership with ekosgen, 2015), to objectively assess Central Lincolnshire's forecast job growth and to recommend employment land needs.
- 3.5 The work of this study was done in two phases, the first focused on analysing a range of standard economic datasets and forecasts to assess Central Lincolnshire's current economic performance and future growth prospects. Commercial property market conditions were also examined. The second phase of work used the outputs of the first phase to devise and test a number of employment growth scenarios, enabling evidenced and reasoned conclusions to be reached on the level of employment growth that Central Lincolnshire could experience over the Plan period from 2012 – 2036.
- 3.6 The ENA produced a baseline forecast and two adjusted scenarios, up to the period to 2030.
- 3.7 In producing forecasts, the ENA notes (para 8.6) that '*the results are indicative/illustrative rather than exact*'; that '*there can be significant variation between forecast models*'; and that '*there is likely to be more variation in longer term forecasts*'. Nevertheless, such forecasting, and the scenarios which can be developed using the forecasts, can provide an indication of what might happen.
- 3.8 The baseline forecast is described in the ENA (para 8.25) as '*the most robust position for expected employment growth in Central Lincolnshire*'. The two subsequent Adjusted Scenarios assume strong growth in professional and business services and the visitor economy (i.e. stronger growth than the national forecasts would suggest), as well as a more stable (i.e. less decline than the national forecasts would suggest) manufacturing sector linked to the strength of key sectors such as food manufacturing. These sectors were chosen for 'boosting' as they align with the key sectors identified by the GLLEP.
- 3.9 The three scenarios were extrapolated in the ENA to cover the plan period of 2012-2036, with the results summarised in Table 1 below.

Table 1: Employment Change 2012 – 2036 (source ENA 2015 – table 9.6)

| Area | Total change in jobs 2012-2036 | | | | |
|----------------------|--------------------------------|----------------|--|---|---|
| | Baseline (gross) | Baseline (FTE) | Adjusted Scenario (lower growth) (gross) | Adjusted Scenario (higher growth) (gross) | Adjusted Scenario (higher growth) (FTE) |
| Lincoln | 4,204 | 3,162 | 6,916 | 8,572 | 6,698 |
| North Kesteven | 6,792 | 5,519 | 7,822 | 8,518 | 7,074 |
| West Lindsey | 4,076 | 3,213 | 4,914 | 5,380 | 4,352 |
| Central Lincolnshire | 15,071 | 11,894 | 19,653 | 22,469 | 18,124 |

- 3.10 The higher growth adjusted scenario resembles the level of growth that is comparatively aligned to historic rates experienced between (rather than including) the last two recessions. The ENA acknowledges that the adjusted scenarios are ambitious.
- 3.11 It is notable that, irrespective of which scenario is used, the GLLEP target for net job growth (13,000 by 2030) would, more or less, be entirely met by the Central Lincolnshire area.

Converting job growth to employment land allocations

- 3.12 A job growth forecast / target is actually not directly important to the Local Plan; it is the implications of such a target which is important, for two main reasons:
- 3.13 To help determine the housing target for the Local Plan: this element is discussed in other Evidence Base documents for Central Lincolnshire.
- 3.14 To determine how much employment land needs allocating in the Local Plan: this element is discussed below.
- 3.15 In terms of employment land, the ENA (see Chapter 10: Quantifying future land requirements) undertakes a thorough methodology in order to convert forecast job growth into forecast employment land requirements. At this point, it is clearly worth noting the uncertainty in this process. First, there is the already noted uncertainty in forecasting job growth. Second, there is uncertainty in converting a job growth figure into land requirements, as no one business has identical floorspace requirements per employee than another. It is, thus, a 'forecast based on a forecast' approach, with the obvious implication being that land requirements generated are very much indicative rather than exact.
- 3.16 Nevertheless, the ENA determines the following headline conclusions:
- The baseline scenario results in a net land requirement of 22.9 hectares, but also notes losses of 23.0 hectares in B1c/B2
 - The Adjusted Scenario (Higher Growth) results in a net land requirement of 53.2 hectares, but also notes losses of 12.3 hectares in B1c/B2
- 3.17 It notes (para 10.29) that it is "*best practice to add a margin of choice / flexibility factor to the land demand forecast calculation. This is an additional amount of land that ensures a reasonable choice of sites for businesses and developers and to allow for delays in sites coming forward or premises being developed*"
- 3.18 It further notes (para 10.30) that the establishing this margin "*is not an exact science and will always be open to a degree of subjectivity. In order to ensure there is sufficient choice in the Central Lincolnshire's land supply, an allowance equivalent to five years supply would be appropriate for enabling the Councils to remain responsive to potential changes and increased market demand that may occur over the plan period*".
- 3.19 At 10.31 – 10.32 the ENA makes commentary on 'allowance for losses' (i.e. the 23ha/12ha losses referred above) though it does not reach a definitive conclusion on how much of an allowance should be included in the Local Plan to make up for such losses.
- 3.20 At 11.8, it makes a broader conclusion that the Local Plan needs to "*identify a pipeline of sites to meet quantitative and qualitative economic development needs over the Plan period*".
- 3.21 Reflecting all of the above, whilst the ENA does not explicitly draw the following conclusion, it is reasonable to state that, as a maximum, the amount of employment land which needs allocating to meet the baseline scenario and the Higher Growth scenario can be calculated as follows:

| | Baseline | High Growth |
|--|-----------------|--------------------|
| Basic Need (a) | 22.9ha | 53.2ha |
| Losses re-allocated in full (b) | 23.0ha | 12.3ha |
| Total (a) + (b) = (c) | 45.9ha | 65.5ha |
| 'five year supply allowance' ((c) / 24 years) x 5 = (d) | 9.6ha | 13.6ha |
| Overall Total (c) + (d) = (e) | 55.5ha | 79.1ha |

- 3.22 For the Further Draft Local Plan (October 2015), no specific fixed target was set. Instead, the baseline (basic) need requirement of 23ha was noted at paragraph 3.5.9 of that Plan, but an explanation was set out in that paragraph as to why the Local Plan was '*proposing to allocate more than the 23 hectares identified*', including reasons relating to choice, flexibility, losses and the inherent uncertainty in the forecasts and calculations. As such, considerably more than 23 hectares was proposed to be allocated. Responses to this consultation are noted in section 4 of this Evidence Report.
- 3.23 In the Central Lincolnshire context, it is also worth noting **Local Development Orders (LDOs)**. LDOs are a mechanism that enable Local Authorities to allow development without the need for planning consent if a set of predetermined criteria within a clearly defined geographical area are met. Their purpose is to speed up development as well give investment decisions greater certainty. Within Central Lincolnshire at the present time, the following LDOs are being established in relation to employment uses:
- **Hemswell Cliff:** This LDO will be linked to the Food Enterprise Zone focussed on Agri-food, a sector that has been identified by the GLLEP in their SEP as being a key sector contributing to the further growth of Central Lincolnshire. This will include B class employment uses.
 - **Lincolnshire Showground:** This site is subject to its own Policy within the Local Plan (LP8 Lincolnshire Showground) and is part of the Food Enterprise Zone also covering Hemswell Cliff. The LDO area is to be determined, and may not match the entire Showground area.

4 Representations on the Local Plan

- 4.1 Consultation on the **preliminary draft Local Plan** took place in late 2014. It should be noted that at this stage, the policy was fundamentally different to that which was developed for future iterations of the plan, and included no proposed site allocations. Nevertheless, a summary of the representations made is as follows:
- The plan should seek to group as many employment nodes as possible into as few easily accessible locations as possible.
 - Inland waterways contribute to local economies as a tourist destination and by supporting small and medium enterprises and jobs in the marine sector.
 - Waterways can help support SMEs as per para 3.4.3 by acting as a focus for urban renaissance, regeneration and diversification whilst delivering other benefits for communities. Policy LP4 should be revised to recognise that waterways are fixed and therefore they will affect where infrastructure can be delivered.
 - Should not assume that RAF figures will remain the same.
 - The Plan should refer to MOD being a significant employer not just RAF.
 - Road improvements are essential to support economy, including A15, A631, Gainsborough Bridge and rail links.
 - There will be need for significant development outside of strategic employment sites to support the food processing industry and houses should be delivered near to these locations for workers.
 - Concerns about the validity of an Economic Growth Strategy (2012). Concerns about inconsistencies between this and other policies / documents.
 - Providing growth of job opportunities is essential to other elements of the plan.
 - Welcome emphasis of delivering employment near to existing, but would welcome priority of brownfield land.
 - Important to tie employment land with delivery of houses to reduce travel needs and therefore traffic.
 - Support for most significant proportion of employment land being located in Lincoln.
 - Concerns about job increases bringing in outside labour and lack of available jobs in downturn.
 - New industrial estates should include renewable energy sources to reduce the need for green field land for these.
 - There is a need for jobs that offer more than basic wages, but incorporate a career structure.
 - The protection of farm land and food production is a vital part of the plan.
 - Jobs should be delivered in villages and countryside to deliver sustainable growth and sustain transport.
 - Policy should enable rural businesses to thrive with a flexible approach that enables new development and allows existing businesses to expand, subject to acceptable local impacts. This will be in line with the NPPF.

- A realistic approach to calculation of new jobs and homes is needed with the recognition that some industries will lose employment, e.g. steel industries.
- Should be a focus of new office development in Lincoln City Centre.
- Existing employment land is under-utilised with single storey parking.
- Extensions to existing business parks which are already full will help to meet needs, e.g. at Caistor, Market Rasen, Hemswell Cliff, and Gainsborough.
- Should make more mention of the Humber Banks employment growth and links to Market Rasen and Caistor.
- Bardney and Scotter need more employment land made available to provide local jobs.
- Concerns about industrial, office and warehousing development in villages.
- Need to ensure adequate communication technology is available in rural areas where new development is proposed.

4.2 All of the comments were carefully considered, and helped inform the ongoing preparation of the employment related policies in the Local Plan. A considerably revised version of the Employment Policy was prepared, including site allocations, for the next round of consultation.

4.3 The **Further Draft Local Plan** was consulted upon in October – November 2015. A summary of the representations made is as follows:

General:

- Various comments broadly supporting elements of the policy.
- The plan lacks clarity on job creation / link between homes and jobs.
- The Water Cycle Study needs updating to assess impact of allocations
- Infrastructure is needed to cope with heavy goods traffic
- Concern that the policy is not in conformity with the NPPF.
- Policy needs to control better the loss of employment sites to other uses
- Policy needs more flexibility/clarity to allow the loss of employment sites to other uses
- Should be more control on new agricultural buildings eg roof colour
- Undue reliance on forecasts
- Policy needs to support expansion of businesses even more than it does.
- Lincolnshire transport infrastructure needs improving if business growth is to happen.
- Water resources needs reflecting in this policy.
- More homes - low job growth: will put more pressure on public services
- Various detailed suggestions, to improve clarity of policy wording

Sites:

- Need new employment allocations – not just rolled forward consents / allocations
- Lack of choice / flexibility for the market.
- Lack of Strategic Employment Sites in north Lincoln

- Object to employment growth in rural areas
- Object to a lack of employment growth in rural area / villages
- New sites suggested: Eg. LN6 and A46 corridor; Enterprise Green; Swinderby Airfield; western side of CL1335; Market Rasen; Navenby; Branston; NE of A15/A17 roundabout (Sleaford);
- Previous allocations in existing Local Plans should be included. Eg: Brookenby; Heighington.
- The delivery of employment in the SUEs is uncertain / likely to be delayed / poor track record – need sites which can deliver early.
- Object to some sites suggested (whole or part). Eg Outer Circle Road EEA; Moorland Industrial Estate EEA; Ruston Works (Pelham Street);
- Concern about three of the EEA – they all include a Local Wildlife Site. As a minimum, this issue needs recognising / policy wording to protect LWS.

4.4 All of these issues have been carefully considered, and the following sections of this evidence report provide a collective response to them.

5 The approach to Policy Structure

- 5.1 The Further Draft Local Plan introduced a structure to the Policy which is broadly carried forward to the Proposed Submission Local Plan, the main difference being the introduction of a section on Sustainable Urban Extensions Employment Sites. The reasoning behind the structure is as follows, with the proposed sites falling into this structure discussed in the next section.
- 5.2 In essence, the structure creates a hierarchical approach to employment provision.
- 5.3 The policy starts with **Strategic Employment Sites (SES)**. This part of the policy specifically lists such sites, which are in strategic locations capable of accommodating significant growth and inward investment. These are of high quality, attractive and generally 10ha+ in size, able to accommodate international or national businesses, but also of appeal to regional or local firms. These are located on a strategic highway network and/or well served by public transport. These sites will be prioritised for business requiring large scale floorplans and with significant numbers of employees to avoid piecemeal development that would potentially prevent large scale development from taking place. It includes the Hemswell Cliff Enterprise Zone
- 5.4 The SES section is followed by a new section introduced at the Proposed Submission stage entitled **Sustainable Urban Extensions Employment Sites**. The lack of including this section at the Further Draft (Oct 2015) stage was considered to be misleading, as the policy gave the misleading impression that all major employment allocations could be found in policy LP5, when in reality further large scale employment sites were also allocated, via the Sustainable Urban Extensions, in much later policies in the plan.
- 5.5 Next step down are **Important Established Employment Areas (EEA)**. This part of the policy recognises those established employment areas which both need protecting for such uses, as well as in many cases able to accommodate further intensification and renewal. Overall, these are good quality employment sites and employment areas with the potential for investment.
- 5.6 The rest of the policy is more generic, starting with **Local Employment Sites (LES)**, which are sites a step lower down the hierarchy again. The policy does not allocate such sites, but generally supports continued employment use on them. The sites are generally suitable for small scale development due to restricted site sizes and/or neighbouring uses. As such they are more likely to attract local investors. They are important in providing local employment opportunities, especially in rural settlements.
- 5.7 The policy then moves on to **Other Employment Proposals**. This is a very flexible criteria based part of the policy, to enable employment proposals to be considered for employment development outside of the hierarchy described above.
- 5.8 Lower down the policy again is a category entitled **Expansion of Existing Business**, which applies to those existing businesses not falling in any of the categories above, but which are seeking expansion of their business.
- 5.9 Finally, the policy has a section dealing with **Loss of Employment Sites and Buildings to Non Employment Uses**, with a flexible criteria based policy set out to be able to consider such proposals on a case by case basis.

6 The approach to site selection

- 6.1 For the Further Draft Local Plan (October 2015), a comprehensive appraisal of around 130 candidate sites were considered, including small plots within existing employment sites, sites with consent and candidate new sites.
- 6.2 However, this approach has not been taken forward. It was deemed too complicated and detailed, and missed the fundamental requirement to calculate what was needed, what was consented (but not delivered) and subsequently what remained to be allocated. A different approach has been taken for the Proposed Submission Local Plan. In simple terms, the approach has been amended so that there are now two separate work streams: **a first stream to establish what undeveloped employment sites need allocating**; and a **second stream focussed on existing established employment areas**, to establish which such sites should be 'protected' for such uses.

Work Stream 1: allocations for new employment development

This work stream aims to establish a suitable set of allocations for future employment development. A two or three step process is necessary:

- a) Establish what unimplemented (part or whole) **consents are in place** (or highly likely to be in place very shortly).
- b) Determine **whether the scale of existing consents is sufficient to meet 'need'** (including allowances for flexibility and geographical spread).
- c) If after (b) it is deemed insufficient, **determine what new allocations are necessary** to fill the gap to meet the 'need'.

Consents in place

At the time of writing, the following significant consents (or similar/equivalent) are in place:

| CL Ref | Name | Nearest main settlement | District | Total Area | Remaining and Available Employment Area at Local Plan start date (2012) | Status |
|--------|--|-------------------------|----------------|--------------------|---|---|
| E1 | Teal Park, Whisby Road | North Hykeham | | 36.0ha | 33.8ha | Planning consent, partial site development |
| E2 | Lincoln Science and Innovation Park | Lincoln | | 11.5ha | 5.4ha | Brownfield site for redevelopment. Planning consent on a site by site basis, as per masterplan. |
| E3 | Network 46, Camp Road | Witham St Hughes | | 22.3ha | 17.3ha | Planning consent granted, partial site development |
| E4 | Somerby Park | Gainsborough | West Lindsey | 12.8ha | 11.5ha | Outline planning consent |
| E5 | Sleaford Enterprise Park, south of A17 | Sleaford | North Kesteven | 14.7ha | 14.7ha | Planning application submitted |
| CL1016 | Sleaford South Quadrant (a SUE) | | | 60.5ha (mixed use) | 'provision of small start-up offices' | With planning consent |

| | | | | | | |
|--------|--|--|--|----------------------|---|-----------------------|
| CL1239 | Gainsborough Southern Extension, south of Foxby Lane (a SUE) | | | 137.5 ha (mixed use) | 4.0ha (based on 15,000sqm) ¹ | With planning consent |
| TOTAL | | | | | 86.7ha | |

In addition to the above, there is provisional agreement (including national consent, in principle) that employment development should take place at two specific locations, as part a 'Agri-Food Enterprise Zone'. The following table sets out the current position:

| CL Reference | Name | Nearest main settlement | District | Total Area | Remaining and Available Employment Area at Local Plan start date (2012) | Status |
|--------------|-------------------------|--|--------------|------------|---|--|
| E6 | Hemswell Cliff | Hemswell Cliff village (Gainsborough nearest large settlement) | West Lindsey | 26ha | 26ha | Land to be designated LDO based on securing new Agri-food Enterprise Zone. Masterplan to be developed. |
| E7 | Lincolnshire Showground | Lincoln | West Lindsey | 79.8 | 2.4ha | Land to be designated LDO based on securing new Agri-food Enterprise Zone. Masterplan to be developed. |
| TOTAL | | | | | 28.4ha | |

Are the scale of existing consents sufficient to meet 'need'?

From the above two tables, it is clear that around 115.1ha of employment land, on significant sized sites, has consent, or similar or imminent status. This total excludes any allowance for small scale consents across the whole of Central Lincolnshire (eg small scale developments permitted, but not yet implemented) or any intensification which can take place in the EEAs.

It is clear that existing consents (or similar) are well above the 79.1ha identified earlier in this Evidence Report as would be needed to meet even the Higher Growth need identified by

¹ Policy LP38 'Gainsborough Southern Neighbourhood SUE' seeks 'around 15,000 sqm of B1 and B2 uses. Using the formula as used in the ENA (see table 10.7), it is assume 7,500 sqm are B1a/b, which have an assumed plot ratio of 35%. This equates to a land take of 2.1ha. It is assumed the remaining 7,500 sqm are B1c/B2, with an assumed plot ratio of 40%. This equates to a land take of 1.9ha. Total employment land therefore estimated at 4.0ha.

consultants Turley in the ENA, and this after taking account of losses and flexibility. It is also apparent that such sites are well spread across Central Lincolnshire, with a focus on the three main settlements but other locations also being identified for a strategic site.

The key question, therefore, is whether the identified 115.1ha is sufficient to meet 'need', taking 'need' in its broadest sense (i.e. including matters such as choice and flexibility for the market). The ENA (at a maximum of 79.1ha) provides the most robust and comprehensive piece of evidence, though some representations to the Further Draft Local Plan (Oct 2015) clearly express a desire for more land than that set out in the emerging Local Plan. Whilst no calculation or detailed evidence is submitted with such evidence in terms of what an appropriate quantity of land should be (i.e. why it should be more than what the ENA suggests), the general position of such representors is that more is need, to give better choice, more flexibility and higher quality options.

To a certain degree, this position of the representors has merit, and perhaps the ENA recommendation is overly restrictive in only recommending an additional five year supply of land to assist in choice and flexibility. Clearly, the more land that is allocated, the greater choice and flexibility would arise. Taken to an extreme, and simplistic view, an almost unlimited choice of sites should mean no business is ever prevented, by the planning system, of either relocating or expanding in the area. However, an unlimited supply would not be sound planning. Land would be allocated which never comes forward, though it would never be clear which land would or would not come forward. Communities would be potentially blighted by an allocation which may or may not ever happen. Infrastructure providers would not be able to soundly prepare investment plans. There may also be the unintended consequence of so much land being available to the market, that investors find it difficult to invest as there is a lack of certainty as to where to invest. Land prices would also likely be severely depressed, meaning land owners potentially refusing to sell, further adding to uncertainty, and lack of delivery.

Thus, simply allocating more and more land above an identified need would not be a sound approach.

However, if a blanket position is taken that, in short, equates to 'enough land is already consented, therefore no further employment land should be allocated', it could lead to a further unsound approach. The obvious one in this regard would be that the proposed (unconsented) Sustainable Urban Extensions (SUEs) would also receive a 'blanket ban' for receiving an element of employment provision. Should such an approach occur (i.e. no employment provision in SUEs), the plan would in effect be promoting large scale single use (i.e. residential) urban extensions, with virtually no prospect of local employment being available to residents (either new, or nearby existing residents). This would neither be sound nor sustainable.

Whilst the merits of including, in principle, SUEs in the Local Plan is set out in other evidence documents, this Evidence Report therefore concludes that it is sound for SUEs to include an element of employment provision. It is worth noting that the Further Draft Local Plan included employment provision within all the SUEs, with no substantive objection received for doing so. As noted earlier, Policy LP5 has been amended so as to highlight the proposed employment provision to come forward via SUEs.

Thus, the Proposed Submission Local Plan continues the approach of including employment provision within the SUE allocations, as set out below (note: the table below excludes the two consented SUEs, as the employment provision on those two SUEs are already accounted for in the two tables on the previous page):

| CL Reference | SUE Name | District | Total Area | Employment provision |
|--------------|----------------------------------|-----------------|------------|----------------------|
| CL1241 | Gainsborough Northern | West Lindsey | 117.4ha | 7ha |
| CL818 | Lincoln NE Quadrant, | City of Lincoln | 83.4ha | 5ha |
| CL819 | Lincoln Western Growth Corridor, | City of Lincoln | 355.3ha | 11ha |
| CL428 | Lincoln SE Quadrant, | North Kesteven | 475.0ha | 7ha |
| CL4668 | Lincoln SW Quadrant | North Kesteven | 76.3ha | 5ha |
| CL3036 | Sleaford West | North Kesteven | 78.0ha | 3ha |
| TOTAL | | | | 38ha |

This 38ha of unconsented employment land provision proposed in the SUEs is in addition to the 115.1ha identified consented (or similar) land, making a total of 153.1ha of strategic employment land, distributed across 15 separate sites. This amount is almost double the maximum amount (79.1ha) recommended by the ENA.

It is also worth reflecting on wider policies in the Local Plan, and the implications for employment provision. In the table below, the following policies are in addition to those already covered in this Evidence Report, but nevertheless offer support for new employment development, on a wide range of sites and a wide range of locations:

| Policy | Employment elements |
|--|---|
| LP2: The Spatial Strategy and Settlement hierarchy | In the settlement hierarchy part of this policy, tiers 3-5 (Market town – large villages – medium villages) includes policy wording which supports employment development on sites of 2ha / 1 ha / 0.25ha respectively. |
| LP33: Lincoln City Centre | Supports in principle some B1 uses |
| LP35: Lincoln regeneration and opportunity areas | Supports B1 uses in all four areas identified |

Whilst no quantification of the likely delivery of employment land via these policies is made, it is clearly likely a great deal of new employment land has the ability to come forward, especially on small sites and across the whole range of settlements in Central Lincolnshire, providing further choice and flexibility to the market, and of a type which is different to the choice being made available by the more strategic sites with consent or coming forward via the SUEs.

Conclusion to Work Stream 1

In conclusion, therefore, there appears no basis for further employment land to be specifically allocated in the Local Plan, for primarily employment purposes. To do so would simply add to the already high level of land available (or being made available via the SUE allocations). Whilst the ENA may be arguably too restrictive in terms of adding supply to allow for choice and flexibility, the amount of land allocated in the Local Plan is considerably in excessive of this amount. The only sound basis for adding even more would be if there was a radical policy approach in the Local Plan to actively identify large scale existing employment areas for redevelopment as non-employment uses, and to be able to demonstrate that such a policy approach was deliverable (eg through large

scale programme of Compulsory Purchase Orders). The Local Plan, throughout its preparation, has never promoted such an option, but rather encourages their on-going use with regeneration as appropriate.

As such, it is not a 'reasonable option' to test and appraise any other land-owner promoted employment sites on non-allocated land, because there is no need identified for any such new allocations. Thus, whilst the earlier Evidence Report (2015) published to support Policy LP5 of the Further Draft Local Plan including a scoring system for such sites, this Evidence Report (and the associated IIA) does not.

Work Stream 2: Existing Employment Areas

This work stream looks at what are termed 'important established employment areas' (EEA). These are areas that have been largely developed and provide a range of smaller plots or renewal opportunities within these established areas. The individual available sites within an EEA are typically less than 10ha in size (usually much smaller). They are able to provide grow-on space and expansion plots for existing established users and can be attractive to other local or regional operators. Some EEA have no sites available but due to their importance for the local and regional economy it is important they are protected, and if sites become available they would be appropriate for employment development.

Protecting such sites also protects existing businesses, by providing additional certainty over the future of these key sites allowing them to grow if required.

In identifying EEA sites there were a number of key criteria that determine their designation. These include:

- Location

Justification: Development in Central Lincolnshire will be focussed on Lincoln, Sleaford and Gainsborough primarily with less growth in smaller settlements. Given this, focussing and protecting employment development in the top four levels of the settlement hierarchy, mirroring that of the housing allocations, delivers employment site in relative proximity to the main housing developments ensuring sustainability. However, it is important to ensure that there are a range of sites spread across the area to allow businesses to choose locations

- Market attractiveness

Justification: EEA should be attractive to international, national, regional and local operators. These sites are existing and commercial in nature with potential for infill development and growth for existing businesses. They should generally be of good quality and popular locations for business.

- Proximity to strategic road infrastructure

Justification: The areas need to be attractive to employers and enable them to access transport links. Given the rural nature of Central Lincolnshire, the areas need to be located close to strategic road infrastructure.

- Status and deliverability

Justification: A range of areas need to be identified. Whilst the Plan period is to 2036, there is a requirement to provide areas that are immediately available to the market as well as plan for the longer term.

Following that appraisal process, it was determined that the following sites be protected for their ongoing employment use, with brief reasoning below as to why: These sites provide a good geographical spread across Central Lincolnshire that provide a range of sites in established business locations

Table 3: Sites proposed as Important Established Employment Area Allocations

| Important Established Employment Area (EEA) | Site Information / reasoning |
|---|--|
| Allenby Industrial Estate, Lincoln | Key employment area with a range of uses. A few vacant plots remain on the site, new units continue to be developed on the estate. The estate borders a new housing estate and is close to the proposed SUE – North East Quadrant. Location for significant employers (e.g. Rilmac, Allied healthcare, ATS euromaster) |
| Great Northern Terrace, Lincoln | Important employment area with a mix of businesses including recycling centre, retail uses, leisure facilities and scrap yards. Good access to strategic road infrastructure. Is likely to be affected by the East/West link road. Important employers based on the site (e.g. City Scrap, various vehicle related businesses, mail depots) |
| Long Leys Road, Lincoln | Small established employment area with good access to the A46. Location for a few key employers (e.g. Curtis', Travis Perkins and a number of small businesses). Land to the rear has been developed for housing but there remains an area of expansion/new build land within the site. |
| Outer Circle Road, Lincoln | Large industrial estate close to large residential areas and retail parks. There are a mix of business types and sizes on the estate. Close to strategic road networks. There are a number of plots vacant of various sizes. Key employers are located on the site (e.g. car dealerships, car parts sales and production, builders merchants) |
| Sunningdale Trading Estate, Lincoln | Medium trading estate between retail parks and residential areas. Close to key strategic routes. Recent development has taken place on the site with some new build or expansion space available. Location for significant employers including car and electrical related businesses, sales and development. |
| Chieftan Way, Lincoln | Medium sized industrial estate with a mix of uses. A number of small to medium sized businesses operate from the site with a few key employers in larger units on the site. Located on an arterial route into the city. Borders the Western growth Corridor SUE but will not be linked via road. Offers a range of types and sizes of units for various established and expanding business. Some land available for expansion, with one plot within the site itself. |
| Waterside South, Lincoln | A well-established employment area in the city along the riverside including key employers such as Starglaze, Anglian Water and adjacent to Siemens city centre site. A small number of key plots remain available for development. Included within a Regeneration/ Opportunity area in the draft Central Lincolnshire Local Plan. |
| Moorland Industrial Estate, Lincoln | Small trading estate providing spaces for sales and manufacturing businesses of varying sizes. Adjacent to a retail park on one side and residential on the other. There is minimal expansion land on the site with no remaining land for new build. Site is close to key routes to the A46. |

| | |
|--|---|
| Monks Way, Lincoln | Small industrial estate, previously part of the allocation for employment with Allenby industrial estate, now separated by a housing estate. Close to key routes in and out of the city with a number of small businesses. A small amount of expansion land is available on this site for existing units. |
| Spa Road East | Employment sites within wider existing commercial area. Bifranghi are a key employer within this area. |
| LN6 Industrial Area | Key commercial area in North Hykeham/south west Lincoln. Location for significant employers (e.g. Lincat, Lindum, Dynex). A number of small plots remaining throughout this important industrial area adjacent to the A46. |
| Gainsborough Industrial Area | Situated adjacent to the A631, this is a key commercial area in Gainsborough and the location for significant employers (e.g. Coveris, Smiffys, Regal Manufacturing). A number of plots remain available for development. |
| Caistor Industrial Area | Important employment area with some significant employers including Sealord and Cherry Valley. Land available for development. |
| Market Rasen Industrial Area | A well-established industrial area for Market Rasen being directly accessible off the A46. Current occupiers include RPC Group, Royal Mail and Rase Steels. Several plots remaining. |
| Saxilby Industrial Area | Located close to the A57 on the Lincoln fringe with good transport links to A46 Lincoln bypass. Home to Lindum Waste Recycling, S G Haulage and VTF Ltd. Small plots remaining. |
| Gateway Park, South Hykeham | Located close to route of Lincoln Southern bypass in established employment area which acts as gateway to Lincoln directly next to A46. Small plots remaining. |
| Sleaford Road Industrial Estate, Bracebridge Heath | Important employment location for Bracebridge Heath some significant occupiers (e.g. Agrii, Rimmer Bros, Ford and Slater). Once Lincoln Eastern Bypass completed this will be at the southern terminus making this area more accessible and attractive to the market. |
| Camp Road Industrial Estate, Witham St. Hughs | Old established industrial area with a few small number of plots remaining. Located next to A46 and significant housing growth over the plan period. Businesses including Advanta, Game Engineering and Frontier presently located here. |
| Sleaford Industrial Area | Key commercial area in Sleaford and location for significant employers (e.g. JP Foods, SHD and Kiowa). A number of small plots remaining throughout this important industrial area adjacent to the A17. |
| Metheringham Industrial Area | Important industrial location in fourth tier settlement close to transport links, the site has some remaining plots available. Located midway between Lincoln and Sleaford serving large rural area. Occupiers include Elesa (UK) Ltd and T M Engineering. |
| Heckington Industrial Area | Located close to the A17, this site is close to transport links. It is home to a number of major employers including The Roasting Company, Smiths Sports & Civils and Melbourne Holdings. |

A number of other candidate sites were considered for EEA status, but were not taken forward. Below is a summary of these other candidate sites considered:

Table 4: Sites considered put not taken forward as Important Established Employment Area Allocations

| Site Considered | Site Information / reasoning |
|----------------------------------|---|
| Potterhanworth Road, Heighington | A 1.8ha, predominantly B8 site. It has poor critical mass, poor access and poor prominence. Isolated site, with only 2 businesses apparent on site. History of local opposition to the site. Overall, rejected. |
| Martin Airfield | 6.2 ha, former RAF Metheringham airfield on B1189. Mix of B classes, but generally of poor quality and poor environment, though access is reasonable. Remote location. Overall, rejected |
| Fen Road, Ruskington | Site comprising of two blocks of light industrial units to the east of Ruskington. Accessed through the village, over the railway line. Good quality building and environment, but poor access down narrow local roads and through village centre. Poor prominence Overall, rejected |
| Moor Lane, Swinderby | Existing large single factory to the east of Swinderby Village on Moor Lane. 8.5ha site. Building vacant, and owners looking for alternative uses. Poor access. Overall, rejected |
| Five Mile Lane, Washingborough | Established employment area approximately one mile east of Washingborough on B1190, and six miles east of Lincoln. 4.5ha. Poor access, and remote from settlements. Overall, rejected |
| Maple Drive, Bassingham | Consists of four blocks of small units in close proximity to local residential units. Poor access - off residential close. Small site under 1ha. Overall, rejected. |
| Mill Lane, Billingham | Development of two blocks of small business units to the west of Billingham on an unclassified road off the B1189. Small site under 1ha. Poor access arrangements. Very close to residential areas. Overall, rejected |
| West Street, Billingham | Historic village centre employment site in the heart of Billingham. Accessed off West Street, a narrow access road through the centre of the village. Poor access and environment. Recent consent for residential. Overall, rejected. |

| | |
|-----------------------------------|---|
| Clayton Road (off Newark Road) | <p>Small established employment area to the south of the city, mix of uses on the site. Former gas site to the rear of the site. Residential to North, South and West of the site. School to the east of the site. Mix of uses, with average building quality, put poor prominence. Frontage of the site is now a large car sales showroom.</p> <p>Overall, rejected.</p> |
| East West Link Area | <p>Historic Industrial Estate close to the city centre with a focus on manufacturing, currently undergoing regeneration and restructure due to development of the East West Link Road through the city. Large retail areas within the site. Access to the site is currently off Pelham Bridge with changes to the road infrastructure currently being carried out as part of the East West Link development. Area overall more appropriate for wider regeneration purposes.</p> <p>Overall, rejected.</p> |
| Firth Road, Lincoln | <p>Established Employment Area close to city centre which has been diversified to retail uses in a large area. Manufacturing focus for the remainder of the industrial area. Residential to East and South. Retail to North and West. Area overall more appropriate for wider regeneration purposes.</p> <p>Overall, rejected</p> |
| Spa Road, Lincoln | <p>Former power station site. Close to city centre. Currently unused. Opportunity for wider redevelopment.</p> <p>Overall, rejected.</p> |

7 Alternative Reasonable Option for Policy LP5

- 7.1 The following alternative options have been considered for this policy. (Option 1 is the preferred policy approach which has been taken forward.)
- 7.2 Option 2: Policy promoting job growth, but no allocations. Whilst this option would be positive towards employment provision, this option is rejected because there needs to be clarity and certainty over where job growth should take place.
- 7.3 Option 3: No policy: rely on national policy. This option is rejected because there needs to be clarity and certainty over where job growth should take place
- 7.4 Option 4: Allocate further employment sites, above commitments and SUEs. Whilst this might give greater choice and flexibility, and in simple terms should mean no business is ever prevented, by the planning system, of either relocating or expanding in the area, an excessive supply above need would not be sound planning. Land would be allocated which never comes forward, though it would never be clear which land would or would not come forward. Communities would be potentially blighted by an allocation which may or may not ever happen. Infrastructure providers would not be able to soundly prepare investment plans. There may also be the unintended consequence of so much land being available to the market, that investors find it difficult to invest as there is a lack of certainty as to where to invest. Land prices would also likely be severely depressed, meaning land owners potentially refusing to sell, further adding to uncertainty, and lack of delivery. As such, this option is rejected.

8 Conclusion

- 8.1 This Evidence Report demonstrates the rationale for the proposed policy as contained in the April 2016 Proposed Submission Local Plan. We hope this helps demonstrate how we have responded to comments received during both the Preliminary and Further Draft consultations, as well as how the latest evidence and national guidance has been taken into account.