

# Independent Examination of the Central Lincolnshire Local Plan



Hearing Statement: Matter 7

Hearing Day: Friday 9 December 2016

Session: AM & PM

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LP/MB/M7

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This paper sets out our comments in response to the questions to be discussed at the Local Plan Examination under Matter 7. Some of the questions appear to be **directed at the Local Planning Authorities. In those cases, we have answered 'no comment', although we reserve the right to respond to the Planning Authorities' statements and those of other respondents on the day.**

Matter 7 – Employment Land, the Visitor Economy and Retailing (LP3, LP5, LP6, LP7)

Issue 7a – Employment Land – Policy LP5

31) The Central Lincolnshire Economic Needs Assessment (ENA)<sup>15</sup> states that between 23 ha (Baseline Scenario) and 53 ha (Adjusted Scenario (Higher Growth)) **of land will be required for 'B' Use Classes over the plan period. Paragraph 3.5.10** confirms that the Local Plan allocates 23ha of new employment land.

#### 1. QUESTION 1

Should the Local Plan set out the requirement for employment land in the same way as it does for housing? Is the OAN/requirement intended to be 23ha?

- 1.1. The economic needs assessment attempts to quantify the needs for allocations under the standard business use classes of B1, B2 and B8. In reality the allocated sites in Central Lincolnshire accommodate a much wider range of employment uses due to the fact smaller settlements and indeed the market towns do not have the available land to accommodate new developments including, for instance, small hospitals and some leisure and retail facilities. In many cases it is more sustainable to ensure that this broader mix of uses is accommodated in market towns and larger settlements, rather than being directed to larger settlements further up the hierarchy. Provision in smaller settlements reduces the travel distances for residents of market towns and the surrounding settlements and supports a more sustainable form of development. Employment allocations tend to be provided with appropriate utilities (water, power, highways, gas, telecoms, etc) to support these other uses, capacity which may be missing within the heart of a market town.
- 1.2. In a rural area such as Lincolnshire there can also be a need both for facilities located closer to the farming community and larger sites for agri-food industrial purposes, hence the need for a range of available sites across the area. It is often difficult to predict the demand for such premises, and as such it is essential to ensure that there is a suitable range of alternative sites in appropriate locations that can be called upon to accommodate these different businesses.
- 1.3. The market for employment land is also fundamentally different to that for residential land. Whereas it can be readily assumed that all residential allocations could be expected to come forward in a plan period, given that homes tend towards a similar size, the same is not

true of employment land. Given the range of size and type of employment uses from large scale warehouses to office buildings, food processing plants and small scale starter units, the site and market requirements are very different. Although some sites could physically accommodate all these uses, there may be good reasons why different forms of development may come forward in very different locations at the same time. It is incumbent then on the development plan to provide a wide range of sites to meet demand over the plan period, on the assumption that some of those sites will remain undeveloped, but still serve a useful function in providing a range and choice of sites to meet different demands at different times. If the 23ha were treated as an OAN and only 23Ha were allocated in the plan period, this would reduce the available range and choice of sites and constrain economic development opportunities across the plan period.

32) The ENA also states that in order to plan positively for potential future employment growth it is considered best practice to add a margin of choice/flexibility factor to the figures. The ENA confirms that this is not an exact science but an allowance equivalent to five years supply would be appropriate for **enabling the Council's to remain responsive to potential changes and increased market demand**. An allowance for losses is also required to account for land recycled for alternative uses, such as residential. With this in mind:

## 2. QUESTION 2

Policy LP5 allocates 153.1ha of employment land on Strategic Employment Sites (SES) and Employment provision on Sustainable Urban Extensions (ESUEs). Given the need identified in the ENA is this appropriate and justified?

2.1. We are not in a position to answer the detailed question, beyond the points raised in response to Question 1.

## 3. QUESTION 3

Is the job target of 11,894 justified? How much of this will be achieved from development proposals in the Local Plan, including employment sites?

3.1. No comment.

## 4. QUESTION 4

How were the sites selected? What factors were taken into account? Where is this evidenced? Has a robust process been followed including the consideration of alternatives?

4.1. Employment allocations need to provide for a range of different economic activities in order to meet the needs of the economy in the local area, based around existing industries including agri-food, engineering and defence and the growing industries including energy production, care and education. The process of site allocation does not appear to have taken into consideration issues of new growth industries such as energy production, or the future role of defence, which is a major employer in the area, with a fundamental impact on the local economy, but which lies outside normal market considerations. Although defence investment seems to be concentrated in Central Lincolnshire, little to no assessment of the impact of this assessment appears to be included in the economic assessment and the consideration of alternative sites.

#### 4a. QUESTION 4a

*How were the Established Employment Areas (EEAs) selected? What factors were taken into account? Are they justified?*

4.2. No comment.

#### 5. QUESTION 5

*What evidence is there that the amount of land proposed for employment is deliverable and likely to be developed over the plan period? Is the overall strategy for job growth and employment appropriate and justified, and does it adequately reflect the existing and future needs of rural businesses?*

5.1. The local economy, like all economies, has a number of characteristics unique to the area, with the historic and future emphasis on defence, agri-food, energy production and education. The sites that have traditionally made up the supply of employment land also tend to have a low profile, and do not reflect investment in the area or give a true picture of the scale of employment and industry in the area. The proposed allocations do not appear to reflect these characteristics in terms of size and location, or the relationship to other businesses and centres of employment. Small sites, such as Kirks Yard at Branston (approved – application No. 15/0754/FUL), which is adjacent to an existing food processing plant and would provide a range of small units for both businesses associated to agri-food and to accommodate other smaller and start up businesses, should be allocated or acknowledged as an existing employment area to support future investment and the growth of the local economy.

5.2. Consideration should also be given to bringing forward well located high profile sites such as the land at the junction of the A15 and A17 Holdingham Roundabout, to accommodate businesses that require access to the jobs market in Sleaford and the higher profile location on the A road network.

## 6. QUESTION 6

How much of the allocated employment land has extant planning permission?

6.1. No comment.

## 7. QUESTION 7

What is the rationale for seeking employment land on most of the SUEs, and will this be deliverable?

7.1. No comment.

## 8. QUESTION 8

Why does the Sleaford South Quadrant SUE contain no employment land?

8.1. The range of uses on Sleaford South reflects the layout of Sleaford itself. Sleaford South lies to the south of the railway and the town centre, and does not front on to the A roads running past the town. The focus for economic activity in Sleaford lies to the north of the town, at and around Sleaford Enterprise Park and East Road. Inclusion of employment uses in the Sleaford South SUE would dilute the economic strategy for the town, as described in the Sleaford Masterplan, and would undermine investment in the established economic areas. The role of the Sleaford South SUE is to facilitate residential growth to meet the targets for the town, together with the supporting services, such as schools (which are employers in their own right), rather than provide directly for economic development.

## 9. QUESTION 9

For clarity should the amount of employment land be listed alongside dwelling numbers in Policy LP3? **Is reference to an 'appropriate amount of employment land' specific enough to be effective?**

9.1. An appropriate amount of employment land will depend on each settlement and be derived from the size and location of the settlement and the existing employment base. Given the need for a range of employment sites to meet different demands, an absolute figure may be difficult to quantify. We would not support an arbitrary flat rate growth

target, as this would be without foundation and would not be effective in delivering economic development; it would instead serve to sterilise development opportunities across the plan area. Whereas the current wording is not specific, it is to be preferred to any arbitrary and unjustified target.

#### Issue 7b – Local Employment Sites – Policy LP5

##### 10. QUESTION 10

**What is intended by 'the amenities of the area' in Policy LP5? Is this policy effective as currently worded?**

10.1. No comment.

#### Issue 7c – Loss of Employment Sites to Non-Employment Uses – Policy LP5

##### 11. QUESTION 11

What is the justification for retaining the established employment areas in Policy LP5?

11.1. No comment.

##### 12. QUESTION 12

The first criteria require **consideration of "...whether the loss of land or buildings would adversely affect the economic growth and employment opportunities in the catchment area the site or building would likely serve..."** How is the catchment area defined? Is the policy effective?

12.1. No comment

##### 13. QUESTION 13

The final criterion requires a marketing exercise based on the lawful use of the premises. What if there is no demand for a B8 use but there is for a B1 or B2 operator? It is intended that all 4 criteria would need to be met or just one? Does the Policy achieve its aims and objectives in this regard? Is this policy effective?

13.1. No comment.

##### 14. QUESTION 14

Is Policy LP5 consistent with paragraph 22 of the Framework which states that 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? Does it provide the necessary flexibility?

14.1. No comment.

Issue 7d – Retail and Town Centres – Policy LP6

15. QUESTION 15

What criteria have been used to determine the hierarchy of centres? Does this relate to the size and existing provision within settlements?

15.1. No comment.

16. QUESTION 16

Have the town centre boundaries, primary and secondary frontages, and secondary shopping areas been appropriately defined in Lincoln, Gainsborough and Sleaford?

16.1. No comment.

17. QUESTION 17

Should Policy LP6, or elsewhere in the Local Plan, set out a requirement for additional convenience and comparison floorspace as established by the Central Lincolnshire and Town Centre Study Update<sup>16</sup>? How will this be delivered?

17.1. No comment

18. QUESTION 18

**Is the requirement for 'other town centre uses' to carry out a sequential test consistent with the Framework?**

18.1. No comment

19. QUESTION 19

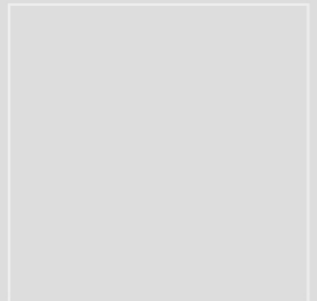
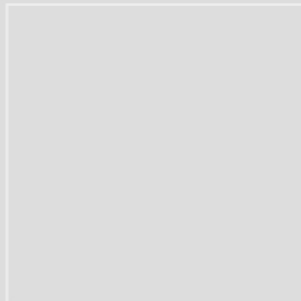
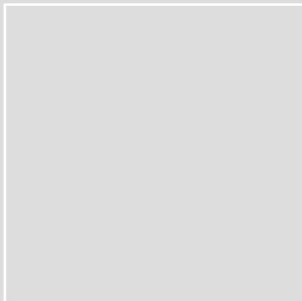
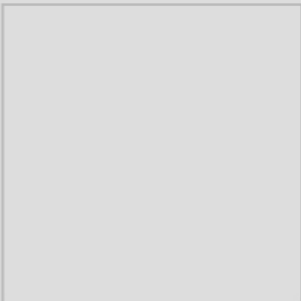
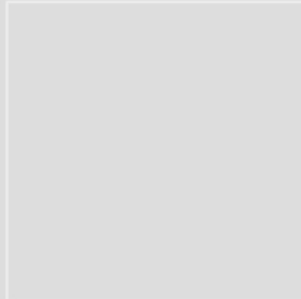
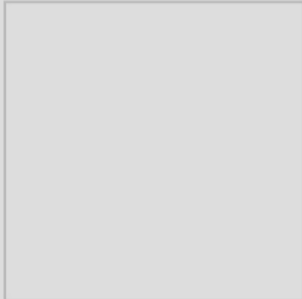
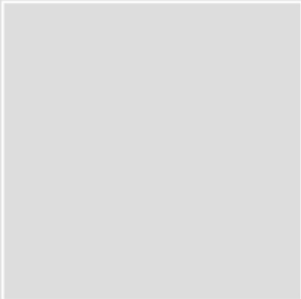
Where an impact assessment is required, Policy LP6 refers to retail proposals. Is this consistent with paragraph 26 of the Framework which refers to applications for retail, leisure and office developments? Does it need to be?

19.1. No comment



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