

# Central Lincolnshire Joint Strategic Planning Committee Hearing Statement

November 2022

[MATTER 11: Employment and Economic Development](#)



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## Issue 1 – Spatial Strategy for Employment – Policy S28

### ***Q1 – What evidence is there that there will be significant growth over the plan period in several sectors, most notably agri-food, manufacturing, business services and the visitor economy, including accommodation and food services?***

In line with the provisions of Paragraph 82 a) of the NPPF (2021) Central Lincolnshire has responded and used the strategies developed by the Greater Lincolnshire Local Enterprise Partnership (GLLEP) to inform the spatial strategy for employment. These growth areas are identified through the GLLEP's Local Industrial Strategy (LIS) (**ECO009**). The GLLEP commissioned Metro Dynamics to produce an evidence base which sits behind the LIS and is available at <https://www.greaterlincolnshirelep.co.uk/priorities-and-plans/evidence-base/>. There are other ambition areas of growth within the LIS, as set out in the diagram on page 4 of the LIS document. The sectors identified in this evidence align to spatial strategy for employment land and the floorspace required.

The evidence set out on page 16 of the Economic Needs Assessment (ENA) (**ECO0001**) notes historic patterns in growth for a number of sectors that are closely aligned to these growth areas identified within the LIS. Key headlines from the table 4.3 in the ENA sets out employment growth rates between 2012-2018, which includes:

- Business admin & support services 52% increase
- Accommodation & food services 36% increase
- Manufacturing 17% increase
- Agriculture, forestry and fishing -12% decrease
- Arts, entertainment, recreation and other services 47% increase

The evidence within the ENA suggests Central Lincolnshire is in a good position for growth in these sectors. It is important to note that whilst general agriculture, forestry and fishing has seen a decline, this does not necessarily include agri-food as this sector transcends agriculture, forestry and fishing to include other sectors such as manufacturing, wholesale and transport and storage.

In contrast to the recent trends set out in the ENA, on page 5 of the LIS it explains that the agri-food sector is predicted to produce 43% more new jobs in this sector.

Therefore, it is concluded in the evidence that these sectors should provide significant growth over the plan period.

### ***Q2 – Is the evidence underpinning the employment strategy based on robust, up-to-date information about growth in these sectors?***

Yes. The Economic Needs Assessment (ENA) (**ECO0001**) was produced in 2020 and has underpinned the spatial employment strategy for Central Lincolnshire. The ENA has identified growth in a number of sectors which has led to the implied need for employment land over the plan period. The ENA used the projections from two leading forecasts from Experian and Oxford Economics. These forecasts have then been evaluated and adjusted using averages of both and the Business Register and Employment Survey (BRES). It is important to recognise that the ENA was produced in a period of economic uncertainty, COVID 19 and the departure from the European Union, which continues to impact on the economy and provide significant uncertainty.

The employment policies evidence report (**EVR0028-034**) brings together the findings from both the ENA and the LIS, both of which have formed the basis for the employment strategy. The

evidence for the employment strategy is robust and up to date formed through past trends and projected growth forecasts and LEP growth areas.

## Issue 2 – Strategic Employment Sites- Policy S29

### ***Q1 – How were the Strategic Employment Sites selected for inclusion in the Plan? What factors were taken into account and were alternatives considered?***

The approach to strategic employment sites remains generally unaltered from the adopted Local Plan. The allocated sites listed within the policy are the same and all of which benefit from planning permission already or are within a food enterprise zone Local Development Order.

These sites are located to align with the general distribution of growth in the plan and they provide flexibility and choice for the market. The key factors that were taken into account when considering alternatives are summed as follows:

- A large proportion of the sites benefit from extant permissions (89.6 hectares)
- Many of the existing sites are progressing with detailed full and reserved matter applications coming through.
- Within the last 5 years, some 10 hectares of employment land has been built out since the adopted plan.
- The identified employment land needs are already met and exceed through retaining allocations with permissions.
- These sites are in strategic locations and are a continuation of the current plan aligned to overall growth.
- Allocating more (option 2 of the SA) would have led to even more oversupply and could undermine confidence in and progress of existing allocated sites.

Overall, the approach to the existing policy is working and delivering employment growth for Central Lincolnshire. The extent of land with permission exceeds the needs and they are progressing well. As such, no alternative sites were required.

### ***Q2 – What is the most up-to-date position regarding approved development on these sites? Are they developable within the plan period?***

The Committee's response to the Inspectors' Initial Question 12, pages 17-19, sets out the latest position of these sites.

All of the Strategic Employment Sites are considered to be developable within the plan period, but there is no requirement for them to be delivered in their entirety within the plan period given the oversupply of land that they offer.

Progress has been made in recent years on all of these sites with 10 hectares having been built out over the past 5 years. The overarching approach to this policy has been to ensure certainty, choice and flexibility in providing sufficient employment land in line with the overall strategy which is one of urban focus. These sites will ensure that there is adequate land available in these main urban areas throughout the plan period.

### ***Q3 – Part 2 of Policy S29 allows for proposals that would result in the loss of business uses on Strategic Employment Sites. Are the requirements sufficiently clear for the policy to be effective and are they justified?***

Yes. The purpose of the policy is to protect employment sites for B2, B8 and Class E (g) uses. However, aligned to paragraph 82 of the NPPF it is important that the plan is flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances. The criteria in part 2 offer allows for this flexibility to be achieved in these sites.

Part 2 of the policy sets out the position where proposals would result in loss of Class B2, B8 and E (g) through a criteria-based approach to ensure future developments are in the most appropriate location and still produce employment generating uses. The criteria in part 2 provides clarity for when such changes will be acceptable in principle and what evidence would be required to justify development not in the use classes proposed for the site. This will be straight forward to demonstrate in a planning application and for decision makers to consider when determining.

### Issue 3 – Employment Allocations on SUEs – Policy S30

***Q1 – For each site, how has the scale of proposed development been determined? Are the amounts justified given the overall need and existing level of committed provision?***

The scale of development has been determined through pre-application discussion with the promoters of Sustainable Urban Extensions (SUEs) and the relevant local authority and through masterplanning exercises in a number of SUEs.

The approach to employment on the SUEs remains unchanged from the adopted Local Plan, which was found sound and this approach continues to align to the NPPF, particularly paragraph 73 which relates to delivery of large scale sites and supporting new housing with access to employment. The SUEs Topic Paper (**HOU011**) sets out the background to the SUEs and details of their progress including some background to their inception and how the masterplanning exercise has been progressed.

Whilst the employment provision on these sites will add to the provision on the Strategic Employment Sites, the delivery of this alongside housing is necessary to ensure that these new communities have access to adequate employment opportunities and it further provides flexibility and choice for the market to deliver throughout the plan period and beyond.

***Q2 – Are the amounts of employment land proposed across the sites achievable?***

All of these SUEs are known to be available for the uses proposed in this policy and in the wider SUEs Policies (S68-S71) and they are known to be developable within the plan period. The amount of employment land on each SUE has been informed by detailed discussion with the land owners, promoters and developers of SUEs and are achievable. Not all of this employment land will necessarily be delivered within the plan period and it is important to note that they do not need to in order to meet the identified job growth forecast.

***Q3 – Is the provision of employment land expected to be linked to housing delivery, or will the sites come forward independently?***

As is set out in the SUEs Topic Paper (**HOU011**) in some cases the delivery of employment is part of a phasing plan which will broadly align to housing delivery (see Western Growth Corridor and

South East Quadrant for example) but on others there is no detailed phasing at this time. However, all SUEs must be planned and implemented in a coordinated way through an agreed broad concept plan as is required in Policy S68. As such the delivery of all employment land on SUEs will be linked to the masterplanning of the wider SUE, but this does not necessarily mean that they will need to wait for housing delivery to occur.

***Q4 – Should additional flexibility be provided to allow for alternative amounts/uses on the SUEs?***

No. The policy provides an approximate estimation of employment land to come forward on the SUEs based on the evidence from discussions with SUE promoters (see response to Q1 above). It does not specify use classes and is clear that the land requirements are approximate.

This policy is linked to the SUEs policies S69-S71. Each of these contain more detailed provisions where this is necessary for the context and progress on each SUE. The combination of these policies provides adequate flexibility and certainty on the SUEs to ensure they deliver sustainable communities.

## Issue 4 - Important Established Employment Areas – Policy S31

***Q1 – How were the sites selected and has a robust process been followed including the consideration of alternatives?***

These sites are a continuation of the sites allocated in the adopted Local Plan. The principle of these sites is already established and allocated in order to protect them for continued employment uses commensurate with their extensive value and large scale.

As part of the work on this Local Plan, a clearer definition for Important Established Employment Areas (IEEAs) was developed using specific measurable characteristics in an effort to ensure they are properly differentiated from sites which are of more localised or limited value. This is set out on page 22 of the policy evidence report (**EVR0028-034**). This included reflecting on the IEEAs in the adopted Local Plan to understand what made them important.

As is set out in the Sustainability Appraisal (**STA004.1g**) an alternative option of not allocating sites in this tier was considered but was dismissed as it would likely result in uncertainty and negative effects.

Policy S31, as the name implies, relates to established employment areas – i.e. already functioning employment areas which are entirely developed or predominantly developed. These sites were intended as a continuation of the sites designated in the adopted Local Plan. Through the process of reviewing the Local Plan for submission, the Committee were not aware of any additional employment sites which meet the definition of IEEAs. Therefore, no further designated sites have been considered. The exception to this is in a site which forms part of site E18 LN6 Industrial Area, where an area which has recently obtained permission as an extension to this employment area is proposed through **Mapmod2**.

The Committee is aware of suggestions at the Regulation 19 Consultation that two sites may be suitable for consideration as IEEAs. However, whilst the Maltings Site in Gainsborough and the British Sugar site in Bardney both take up a large site area, they do not meet the criteria set out for this designation in the evidence report.

***Q2 – Is it clear to decision-makers, developers and local communities how applicants for planning permission should demonstrate that any loss would not have an unacceptable impact on the overall supply of employment land or premises?***

Yes. Policy S31 provides four clear criterion to assess the impacts of a scheme. By assessing any proposals against the criteria in part 2 of the policy this will ensure that all impacts are considered and can be taken into account in decision making whilst also providing clarity about what losses are likely to be supported from a policy perspective.

The marketing exercise in particular will allow the applicant and decision maker to test whether there is in fact an ongoing need for the use on the site. If it is shown to not be required through this exercise and where it satisfies the other requirement including not impacting on the wider site, then the proposal will be acceptable. This is closely aligned to the requirements of paragraph 82 d) of the NPPF.

***Q3 – What is the justification for suggested modification MMSC7? Is it necessary for soundness?***

Modification MMSC7 is required to ensure that the proposed approach in the evidence base matches the policy. This change was intended to be made to the policy to better define the tiers of the hierarchy and differentiate more between Local Employment Areas and Important Established Employment Areas and was intended to be changed prior to the Regulation 19 Consultation. This proposal is set out in the table in paragraph 6.12 of the evidence report for the employment policies (**EVR028-034**). This change will help ensure that the role of the types of employment areas are more defined and aligned to their value and will help to ensure that the policy is clear and effective.

## Issue 5 - Local Employment Areas - Policy S32

***Q1 – Local Employment Areas (LEA) are defined as sites sized 0.5ha or more, at least 2,500sqm of existing floor space and with 3 or more units occupied by separate businesses, within Tiers 1-6 of the Settlement Hierarchy as defined in Policy S1. How was this definition derived and is it justified?***

A definition for Local Employment Areas (LEA) was developed by reviewing existing employment sites as a starting point and using measurable indicators to form the definition based on their role and importance. This is set out on page 22 of the evidence base report (**EVR0028-034**). The employment policies are set out as a suite of policies that link with the settlement hierarchy. This policy approach is a general continuation of the existing policy LP5 (albeit now split into different policies) and it is justified as it provides clear differentiation between different types of employment areas with bespoke policies for these tiers to tailor for their needs and opportunities specifically.

***Q2 – Is Policy S32 sufficiently clear as to whether a piece of land is a Local Employment Area or not? Should these sites be listed in order for it to be effective?***

Yes, it is sufficiently clear and no, the sites do not need to be listed. By including the definition in the policy it can be clearly and quickly identified whether or not a site would be considered as a Local Employment Area by considering its characteristics against the criteria.



## Issue 6 - Employment Proposals in Settlements – Policy S33

### ***Q1 – Is it sufficiently clear as to what scale and type of employment use would be supported on unallocated sites in accordance with the settlement hierarchy defined by Policy S1?***

Yes. This policy looks at the process for choosing a site for employment development and the impacts of such a development. It does not set any specific size or scale thresholds, but considers the impacts. This is a sound approach to ensure that such proposals can be thoroughly assessed and that they will not harm sites higher up in the employment hierarchy.

The criteria provide a way for applicants to assess the situation and present it as part of an application to identify whether the proposal will be policy-compliant as part of the hierarchical approach. It provides adequate flexibility to allow for reasonable schemes to come forward, whilst protecting the designated sites further up the hierarchy.

This policy will ensure that employment-generating proposals within identified settlements are supported when the criteria-based framework has been demonstrated to be met by evidence supporting an application. This is generally consistent with the requirements of existing policy LP5 under the heading “Other Employment Proposals”, and this has been working effectively since the current Local Plan was adopted.

### ***Q2 – Does Part 1(a) apply to all development proposals, even small-scale schemes for individual premises?***

Part 1 (a) sets out a sequential test to ensure that there is no suitable alternative provision on employment areas farther up the hierarchy. Whilst in principle this will be applied to all proposals of employment uses including for small scale schemes it will be straight forward to implement.

If the proposal is for the extension of an existing premises, part 1(a) will not apply as is clarified in the policy. For new employment developments of a small scale this will require setting out why any existing sites higher up the hierarchy are unsuitable, and the small scale of the business is a perfectly justified rationale for their unsuitability.

### ***Q3 – How would proposals demonstrate no significant adverse impact on the viability of delivering allocated employment sites? Is this justified and effective?***

This provision will only apply to employment development of a scale that would undermine the role of existing employment areas. It is unlikely to be applicable in many cases, save where the scale of development is proposed that would result in the proposal being classified as an employment area under the tiers higher up in the hierarchy.

As part of an application, proposals would need to be accompanied by a demonstration of why the proposal is sufficiently different to any allocation or why there is sufficient need to support both proposals. This links closely to a) of the requirements. There are a variety of ways that this can be demonstrated, such as by identifying specific users or uses on the site or highlighting attributes that are different to existing sites, but it allows decision makers to consider any impacts on designated sites should they be likely.

This will allow the impacts of proposals to be fully understood whilst providing adequate flexibility for development on unallocated sites to come forward and provides a clear and transparent basis for considering them



## Issue 7 - Employment Proposals in the Countryside – Policy S34

***Q1 – Policy S34 limits proposals for employment generating development in the countryside to the expansion of an existing employment use and development proposals that support the growth of the agri-food sector or other land-based rural businesses and buildings. What is the justification for this approach? How would a development proposal for other employment uses in the countryside such as minerals extraction be dealt with?***

The approach of this policy is to ensure that any employment development is only located in the countryside where there is a clear and unavoidable reason for it being located there instead of within a settlement and where it is otherwise acceptable and will not give rise to unacceptable harm. This approach is consistent with paragraph 85 of the NPPF and links to Policy S5 which sets policy for countryside areas.

This approach will also ensure that the location of employment development is broadly aligned to the distribution of housing development and infrastructure.

Minerals development is typically determined by the Minerals Authority (Lincolnshire County Council) against the relevant policies of the development plan which is mainly contained within the adopted Minerals and Waste Local Plan. The policy framework of the development plan (including this Local Plan and the Minerals and Waste Plan) provides coverage across a number of uses to consider how proposals should be treated. For minerals and waste that will include the provisions of the Minerals and Waste Plan and it is not intended that this policy will conflict in anyway with the provisions of that plan in relation to minerals workings.

When taken as a whole it is not considered that this policy would be readily applied or (or certainly would not restrict) a proposal for minerals extraction, particularly when read alongside Part E of Policy S5 in this plan and the policies in the Minerals and Waste Plan.

Whilst it is not considered to be necessary, the Committee would not object to clarification of this being added to the policy or supporting text.

***Q2 – Is Policy S34 consistent with paragraph 84 of the Framework, which states that planning policies should enable the sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing buildings and well-designed new buildings?***

Yes. This policy, particularly when considered alongside the other employment policies and policies S5 and S43, (which relate to development in the countryside and rural tourism respectively) will allow for the sustainable expansion of businesses in rural areas, the development and diversification of land based rural businesses, and sustainable rural tourism.

It provides enough checks and balances to be considered as part of applications to ensure that the opportunities and impacts will be fully understood and provides a positive framework for such schemes. It allows for both the expansion of existing buildings and construction of new buildings which, when considered alongside the design policy (S53) will ensure that any new development is well-designed.