Core Strategy Statement of Further Representations

Matter 4

This statement has been jointly signed up to by Leicestershire County Council
Matter 4 – Economic Development

Key Issues and Questions:

1. Does the recently published PPS4: Planning for Sustainable Economic Growth (PPS4) necessitate any major or minor changes to the Core Strategy?

1.1 The Core Strategy will not require major or minor changes as a result of the recently published PPS4: Planning for Sustainable Economic Growth which, in particular, identifies the importance of having appropriate evidence to support policies in respect of economic development.

1.2 It is our opinion that the Core Strategy takes note of the relevant evidence in determining the future demand for employment land in the Borough and for managing the growth and regeneration of the centres of Wigston, Oadby and South Wigston.

1.3 The evidence used, at the time of preparing the Core Strategy which was before the publication of PPS4, includes the ‘Leicester and Leicestershire Housing Market Area Employment Land Study’ (PACEC 2008) and the ‘Oadby and Wigston Employment Land Study’ (2006). Account was also taken of the ‘Oadby and Wigston Economic Development Strategy’.

1.4 As a result of this evidence the Core Strategy proposes that employment land needs are met on existing employment areas and within the town centres. In addition, the Direction for Growth will include a proportion of new B1 and/or B2 employment land that will eventually replace the equivalent amount of poor quality employment land located within existing identified employment areas in the Borough.
1.5 The Leicester Principal Urban Area Strategic Planning Context Document identified how the centres of Wigston, Oadby and South Wigston relate to the wider network of centres. Wigston is one of only two town centres in the Leicester Principal Urban Area.
2. Having regard for PPS4, and the Spatial Objectives of the Core Strategy, is it clear how the Core Strategy will make provision for the local economy to grow and prosper?

2.1 The Core Strategy reflects the deficiencies in the current employment land supply and labour market and highlights the steps that are proposed to develop a higher skill, higher value local economy. It seeks to support the improvement of existing employment land, the development of new employment and economic activity within the town centres and the provision of new employment land as part of the Direction for Growth, in particular for higher value employment uses.

2.2 The Strategy recognises the need to improve the quality of the local ‘offer’ and proposes closer working relationships with local employers and with the local universities to identify and encourage local growth and knowledge-based business start-ups.

2.3 Central to the delivery of this approach will be the work undertaken by members of the recently convened Employment and Enterprise Sub-group of the Local Strategic Partnership which will include Prospect Leicestershire. The Sub-group will take as its starting point the Oadby and Wigston Economic Development Strategy.
3. Is the approach to employment land provision in the Core Strategy justified in advance of completing the employment land and premises review referenced in paragraph 5.21?

What is meant by an “Identified Employment Area” in the Direction of Growth (paragraph 5.58 of the Core Strategy)? Should decisions on the uses and amount of employment land there be deferred to a future DPD as implied in paragraph 5.63?

3.1 Core Strategy Policy 1 reflects the outcomes of the ‘Leicester and Leicestershire Housing Market Area Employment Land Study’ (PACEC, October 2008), by requiring an amount of land to be identified for ‘additional’ employment land consistent with the outcomes of the study. Paragraph 5.12 of the Core Strategy provides an indication of where this will be provided.

3.2 The Core Strategy also makes provision for the Direction for Growth to include a proportion of new B1 and/or B2 employment land that will eventually replace the equivalent amount of poor quality employment land located within existing identified employment areas in the Borough. The Direction for Growth will not contain any employment land ‘additional’ to the amount that currently exists within the Borough.

3.3 Therefore, the Core Strategy states that the actual amount of employment land to be provided within the Direction for Growth will be established through the Allocations Development Plan Document which will be informed by an employment land and premises review. This study and its outcomes will relate to detailed matters associated with the quality of employment land in the Borough and it is firmly our opinion that a study of this nature would not be appropriate to evidence a strategic document such as the Core Strategy.

3.4 Paragraph 5.38 of the Core Strategy sets out the general principles for the Direction for Growth to provide a highly sustainable development. To achieve this, a balance between the number of homes and the amount of employment land will be required as identified by Core Strategy Policy 1 in its reference to ‘a proportion of new B1 and B2 employment land’.
3.5 Clearly, if the employment land and premises review identified such a large amount of existing employment land to be replaced through an allocation within the Direction for Growth that it would result in a disparity in the balance between employment and housing then it would be inappropriate to allocate the full amount to the Direction for Growth. Furthermore it would be contrary to Core Strategy Policy 1 because the allocation would not be proportional.

3.6 However, if the employment land and premises review identified an amount of existing employment land to be replaced through an allocation within the Direction for Growth that would achieve a balance between employment and housing then the study will have been of real value in evidencing the Allocations Development Plan Document.

3.7 It is therefore our opinion that this approach to employment land provision in the Core Strategy is justified, and, fully in conformity with Policy EC2.1 of PPS4 which sets out the requirements of Development Plans and does not specifically refer to Core Strategies.

3.8 However, a number of participants have suggested that the Core Strategy should provide clearer guidance about the appropriate scale of employment land to be provided as part of the Direction for Growth and David Wilson Homes have suggested 2.5 hectares would be an appropriate amount.

3.9 There is no established methodology for identifying an appropriate balance between housing and employment land on a mixed use site at a strategic level. Although at a more detailed level, masterplans can be used to test various scenarios.

3.10 For the purposes of the Core Strategy however, 3.5 hectares of employment land would equate to just under a third of the amount of land that would be developed for housing based on 452 dwellings at 40 dwellings per hectare. In the absence of an established methodology a proportional split such as this may be an appropriate option and would be consistent with Core Strategy Policy 1.
3.11 Therefore, if it were considered necessary to identify an amount of employment land that should be provided within the Direction for Growth in Core Strategy Policy 1, a maximum amount of 3.5 hectares might be considered appropriate, particularly given the emphasis on prioritising employment land and economic development issues in the Vision and Spatial Objectives of the Core Strategy. A maximum figure would also allow flexibility to take into account the effect of other non housing or employment land uses which may need to be provided within the Direction for Growth, at masterplanning stage.

3.12 In relation to the Direction for Growth, the Assessment of Highways and Transportation Implications (ARUP, May 2009) considered a ‘high employment’ scenario of 6.12 hectares of employment land in the modelling work undertaken. An amount of 3.5 hectares of employment land would therefore fall well within the high impact scenario of this study.

3.13 It should be noted however, that identification of an amount of employment land to be provided in the Direction for Growth in the Core Strategy is not the Council’s preferred approach. This is because we do not feel that such a figure would be based upon robust evidence and that it would undermine work in relation to other Development Plan Documents.

3.14 An Identified Employment Area is a term which originates from the saved Local Plan. It defines those area where land is specifically reserved for employment purposes, such as industrial estates. Identified Employment Areas are important in the Borough given its built up and predominantly residential nature to ensure that business activity does not adversely affect the residential community.

3.15 Identified Employment Areas are also defined boundaries on the Proposals Map and it is anticipated that these will be reviewed and amended in the Allocations Development Plan Document based upon its supporting evidence. In the meantime, the Council would like to remove reference to Policy EM1 for the List of Saved Local Plan policies to be superceded by the Core Strategy in Appendix 3 to ensure that Identified Employment Areas remain designated
on a Proposals Map until adoption on the Allocations Development Plan Document.
4. How will the Core Strategy secure the optimum retention and expansion of employment land and premises for particular sectors and types of business within the Borough over the plan period?

4.1 The Core Strategy recognises the need to increase the value of local businesses, which, in the main, are occupying less than optimum premises, have limited scope for expansion in their existing location and are employing relatively poorly skilled workers.

4.2 The Core Strategy aims to facilitate expansion within the existing employment areas, in the town centres and in the Direction for Growth particularly for those businesses seeking to improve the quality of their activity and employ more skilled people.

4.3 The Core Strategy also recognises the need to see more of the local residents with higher levels of skill working within the Borough. As a result, the Borough Council will be working with businesses within existing employment areas to facilitate their growth and an improvement of their overall quality. Again this will be an economic development function of the LSP partners.

4.4 The Core Strategy sets out a framework for this approach, particularly encouraging better quality retailing and commercial activity within the town centres. The Direction for Growth is earmarked in particular for young ‘knowledge-based’ businesses, those already in the Borough seeking expansion opportunities or from inward investment. The Core Strategy mentions the need to work with the local Universities to exploit opportunities for graduates to establish businesses in the Borough and for locally based resident students to underpin the establishment of niche service activity particularly in Oadby town centre.

4.5 The Core Strategy provides certainty to the business community that action will be taken and what that action will be, in the form of the Allocations Development Plan Document and the Town Centre Masterplans Area Action Plan. This is consistent with Policy EC2.1 b and c.
5. Are the figures in Core Strategy Policy 1 for office floor space, industrial and warehousing land, and freehold land and premises founded on credible evidence?

5.1 The Core Strategy used the ‘Leicester and Leicestershire Housing Market Area Employment Land Study’ (PACEC 2008) as the basis for the figures for both office floor space and industrial and warehousing land. This study was undertaken consistently across the Housing Market Area and takes a broad view of the employment land position without being constrained, for example, by individual local authority boundaries. Importantly, all of the Leicestershire districts and Leicestershire City Council have endorsed the study and are using the outcomes to inform their individual Core Strategies.

5.2 The ‘Oadby and Wigston Employment Land Study’ (2006) noted the relative deficit of freehold land and the preference that small ‘knowledge’ businesses – potentially the type being encouraged – had to own a freehold interest in the land or premises.
6. What is meant by an “Identified Employment Area” in the Direction for Growth (paragraph 5.58 of the Core Strategy)? Should decisions on the uses and amount of employment land there be deferred to a future DPD as implied in paragraph 5.63?

6.1 See answer to question 3.
7. In paragraph 5.26, does mitigation include avoidance and selecting alternative sites ie. if contamination is likely to adversely affect people and the environment, should suitable location be the first consideration?

7.1 Yes, mitigation could include avoidance or selecting alternatives sites. This is something that would be considered through the Development Control process in relation to the particular proposal and the type/degree of contamination that it could pose. Paragraph 5.26 is concerned that, if proposals that would result in the contamination of land go ahead, particular consideration is given to mitigating the effects for future occupants of the land.
8. Are the policies for the centres of Wigston, Oadby and South Wigston founded on good evidence of town centre hierarchy, and the need for retail and other town centre uses including leisure & office development?

8.1 See answer to questions 10 with regard to town centre hierarchy.

8.2 See answer to question 11 with regard to retail uses.

8.3 With regard to the need for office development, the policies for the centres of Oadby, Wigston and South Wigston are based on evidence contained in the Leicester and Leicestershire Housing Market Area Employment Land Study as referred to in Core Strategy Policy 1 and paragraph 5.12.

8.4 With regard to Leisure facilities, there has been no evidenced need for built leisure facilities within the Borough’s three centres as evidenced by the PPG17 Open Space, Sport, and Recreation Facilities Study.
9. Should cultural activities including the theatre, museums and libraries be referenced?

9.1 Referencing cultural activities including the theatre, museums and libraries would add further clarity to the Core Strategy. Therefore, Paragraph 7.64 on page 92 could be amended to read ‘and cultural facilities such as museums, libraries and theatres’.
10. Is the use of language to describe the main centres in the Borough consistent and in line with PPS4?

Are the policies for the centres of Wigston, Oadby and South Wigston founded on good evidence of town centre hierarchy, and the need for retail and other town centre uses including leisure & office development?

10.1 The Core Strategy’s retail hierarchy is based upon evidence illustrated within the Leicester Principal Urban Area Strategic Planning Context, Planning Policy Statement 4, and Leicester City’s Submitted Core Strategy. The Leicester Principal Urban Area Strategic Planning Context document has been prepared with the involvement of Leicester City Council and other leicestershire districts and summarises elements of existing published reports and emergent development plan documents in order to express the strategic planning context of the Leicester Principal Urban Area.

10.2 Annex B of PPS4 contains definitions for City Centres, Town Centres, District Centre and Local Centres which is consistent with the definitions previously contained in PPS6. The language used to describe the main centres in the Borough is therefore consistent and in line with PPS4.

10.3 In line with comments made by Government Office for the East Midlands the list of retail and shopping centres within and beyond the Borough Boundary on pages 52 and 53 of the Core Strategy do however require amendment to ensure that the centres are consistent with their definitions.

10.4 Regional and Sub-Regional Shopping Centres should be deleted from the lists under paragraphs 5.79 and 5.80 because these do not form part of the retail hierarchy. Narborough and Enderby need to be removed from the Main Towns row of the list under paragraph 5.80 to the Local Centres row’. This will also ensure consistency with the Leicester Principal Urban Area Context Document.

10.5 In response to comments of Sainsbury’s Supermarkets Ltd the range of
services and facilities at Glen Road/Highcroft Avenue is significantly smaller than the range of services available in the centres of Oadby and South Wigston which are currently identified as district centres in the Core Strategy.

10.6 In terms of the definition of a district centre in Annex B of PPS4, although Glen Road/Highcroft Avenue does include a Supermarket, it does not include groups of shops (it contains a single group of 4 units). Neither does it contain a bank, building society, restaurant or library. Therefore, in our opinion the Core Strategy correctly identifies Glen
11. Should Policy 2 make clear how much new development for the various town centre uses is being sought in each of the 3 main centres, and when, over the plan period?

Are the roles and relationships of the Core Strategy and Area Action Plans described appropriately?

Are the policies for the centres of Wigston, Oadby and South Wigston founded on good evidence of town centre hierarchy, and the need for retail and other town centre uses including leisure & office development?

11.1 Core Strategy Policy 2 aims to set out an overall strategy for development in the centres of Oadby, Wigston and South Wigston.

11.2 Given the relatively small administrative area that the Borough covers, it is unusual in having three main centres. Furthermore, each of the centres play an important role for local people and in terms of the economic prosperity of the Borough. This is expanded upon further in spatial portrait contained in the revised version of Chapter 3. In addition, the Vision and Spatial Objectives also highlight the importance to be given to the three centres and the opportunities that exist to promote their regeneration and economic development.

11.3 Due to the importance of the centres to the Borough, the Council has agreed that the Local Development Framework should have a particular focus on the three centres. Therefore, the Borough Council has prepared masterplans for the three centres and is preparing a Town Centre Masterplans Area Action Plan for the centres of Wigston and Oadby (the Borough Council is proposing to deal with the centre of South Wigston through the Allocations Development Plan Document because less development is identified in the masterplan for this settlement).

11.4 This approach is supported by Core Strategy Policy 3 which sets out the detail and issues that Masterplans Area Action Plan and other regeneration
schemes should contain. For example, Core Strategy Policy 3 requires the
Masterplans Area Action Plan to identify sites suitable for new development
or redevelopment of appropriate uses and to establish a spatial and
sustainable pattern of growth.

11.5 In order to properly achieve this it is more appropriate for the Town Centre
Masterplans Area Action Plan (and in the case of South Wigston the
Allocations Development Plan Document) to identify how much new
development for the various town centre uses is being sought in each of the 3
main centres, and when, over the plan period.

11.6 A Retail Capacity Study has been prepared as part of the evidence base for
the Town Centre Masterplans Area Action Plan. This sets out how much retail
capacity exists in each of the three centres. However, in line with Core
Strategy Policy 3, it will be for the Town Centre Masterplans Area Action Plan
to determine how much retail development it is feasible to provide in the
centres taking account of, for example, a sustainable pattern of growth and
constraints to development (eg the economic climate compared to when the
Retail Capacity Study was carried out).

11.7 In our opinion the Core Strategy sets out a clear approach to supporting
regeneration and economic development in the three centres through the
overall strategy provided by Core Strategy Policy 2 combined with the
masterplanning of the centres with the opportunity to deliver the masterplans
through an Area Action Plan supported by Core Strategy Policy 3. As a result
of this approach it is not considered appropriate for Core Strategy to set out
the amount of development to take place in the centres, when or how it will be
delivered. This approach is fully in conformity with Policy EC3.1 of PPS4
which sets out the requirements of Development Plans but does not
specifically refer to Core Strategies.

11.8 Given the above, and in response to the Statement submitted by Oadby
Trinity Methodist Church, whilst it is appropriate for Chapter 8 to identify the
amount of additional retail provision to be provided in each of the centres as
an indicator related to the Spatial Objectives, the target (which originated from
the Retail Capacity Study) should be removed until such a time that the
amount of retail development to be provided in each of the centres is approved through the Town Centre Masterplans Area Action Plan (and in the case of South Wigston the Allocations Development Plan Document).
12. Does Core Strategy Policy 2 address the sequential approach correctly (it seems to imply that proposed development within the centres will be subject to it)?

12.1 Core Strategy Policy 2 states ‘in considering proposals for new retail development within the centres, the Borough Council will apply the sequential approach to site selection’.

12.2 PPS 4 Policy EC5 states ‘Sites for main town centre uses should be identified through a sequential approach to site selection. Under the sequential approach, local planning authorities should identify sites that are suitable, available and viable in the following order:
   a. locations in appropriate existing centres where sites or buildings for conversion are, or are likely to become, available within the plan period
   b. edge-of-centre locations, with preference given to sites that are or will be well connected to the centre
   c. out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are closest to the centre and have a higher likelihood of forming links with the centre’.

12.3 Given that the definition in PPS4 refers to edge of centre and out of centre locations, for consistency, the words ‘within the centres’ need to be removed from the appropriate sentence in Core Strategy Policy 2, to read ‘in considering proposals for new retail development, the Borough Council will apply the sequential approach to site selection’.
13. Are the roles and relationships of the Core Strategy and Area Action Plans described appropriately?

13.1 See answer to question 11.
14. **Are the policies for the centres backed by a delivery strategy consistent with section 4 of PPS12?**

14.1 PPS12 section 4, states that ‘every local planning authority should produce a Core Strategy which includes…a delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered…and clear arrangements for managing and monitoring delivery of the strategy’.

14.2 As set out in the answer to question 11, Core Strategy Policy 2 aims to set out an overall strategy for development in the centres of Oadby, Wigston and South Wigston. It is supported by Core Strategy Policy 3 which sets out the detail and issues that Masterplans Area Action Plan and other regeneration schemes should contain.

14.3 The Borough Council has prepared masterplans for the three centres and is preparing a Town Centre Masterplans Area Action Plan for the centres of Wigston and Oadby (the Borough Council is proposing to deal with the centre of South Wigston through the Allocations Development Plan Document because less development is identified in the masterplan for this settlement). The Masterplans combined with the Town Centre Masterplans Area Action Plan and Allocations Development Plan Document will therefore act as the delivery strategy for the policies for the centres contained in the Core Strategy. They will set out how much, where, when and by what means development will be delivered.

14.4 For each of the centres, Chapter 8 of the Core Strategy also set out the key outcomes sought in the policies, how they will be delivered and who is responsible for delivery, along with relevant indicator and targets that will be used to monitor progress.
15. Does the Core Strategy take sufficient account of the future plans for development of the University of Leicester (the “Development Framework Plan” mentioned in paragraph 5.87)? Or should expansion of the Oadby campus be resisted because it would be harmful to an area of open space and unsustainable?

15.1 The objective of the planning process is to manage development and not resist or control development. The University of Leicester’s Oadby campus is located within a designated Conservation Area, but such a designation should not restrict development if sought to be achieved in an appropriate manner.

15.2 Core Strategy Policy 3 states ‘where large scale change or regeneration schemes are proposed, the Borough Council will require the production of Masterplans, Development Briefs and/or other appropriate plans or strategies’. A Development Framework Plan would be considered an ‘appropriate plan or strategy’. The policy contains criteria that such a regeneration scheme should take into account. It is our opinion that through this policy, the Core Strategy does provide the context with which to take sufficient account of the future plans for development of the University of Leicester.