

Responses on Consultation Draft of Employment Land SPD - consultation 31<sup>st</sup> May -11<sup>th</sup> July 2007

Company / Organisation External=General Contacts 1. Contacts database	Consultation Type	Issues raised	Issues addressed	Respondent no.
GVA Grimley	Letter by post	No Response	No Comment	
M3	Letter by post	No Response	No Comment	
Knight Frank	Letter by post	No Response	No Comment	
North Rae Sanders	Letter by post	No Response	No Comment	
City Industrial	Letter by post	No Response	No Comment	
Clive Garner and Partners Mr Musson	Letter by post – Response Email	<ul style="list-style-type: none"> <li>The proposal for existing small sites for redevelopment in Table 3 of Appendix 2 does not take into account that the existing use and value of these sites is undoubtedly greater than the redevelopment value making it unlikely that the majority of these will be redeveloped for either commercial or residential use. The financial calculations are adversely affected by the social housing requirements of LCC.</li> <li>The fundamental problem within the city is lack of allocated land for industrial development/ use. The problem is compounded by the removal of businesses from the city centre, with the redevelopment of Frog Island and St Georges.</li> <li>The price of industrial property has increased largely due to the increased demand and lack of supply. This has a knock on effect of making redevelopment harder.</li> <li>Land which becomes available under the present policies is insufficient to meet the current demand.</li> <li>The land sold by the LCC to LRC has remained</li> </ul>	<p>I do not agree that the existing value is greater than the redevelopment value for housing. This is evidenced by the fact that a number of planning applications have already been made for residential use.</p> <p>The lack of land within the city is highlighted by the Employment Land Study (ELS). A sentence to this effect has been added to ELS page of this report. It is an issue that this SPD should not address, but will be considered through the Local Development Framework (LDF). The land in the LRC intervention areas is</p>	1

		<p>undeveloped because of restrictions placed on it by LRC. This land could have been developed and be in occupation by companies if the land had been available on the open market.</p> <ul style="list-style-type: none"> <li>• Evidence of pent up demand is how quickly Gipsy Lane brickworks was sold and occupied. If more buildings and more land were available then more companies would relocate and provide better workspace for their employees.</li> <li>• Concludes, a greater allocation of industrial land is required to satisfy current demand. It is no good having residential units if the people who live in them have no where to work.</li> </ul>	<p>predominantly privately owned.</p> <p>The lack of industrial land cannot be addressed through this SPD and will be considered through the Local Development Framework.</p>	
Snow and Astill	Letter by post	No Response	No Comment	
Sturgis Shattock and Partners	Letter by post	No Response		
APB	Letter by post	No Response	No Comment	
Spencers Druce	Letter by post	No Response	No Comment	
Lambert Smith Hampton	Letter by post	No Response	No Comment	
Innes England	Letter by post	No Response	No Comment	
Faulkner and Co	Letter by post	No Response	No Comment	
Mather Jamie	Letter by post	No Response	No Comment	
Hammond Grange Ltd	Letter by post	No Response	No Comment	
Alliance & Leicester	Letter by post	No Response	No Comment	
Brett & Randall	Letter by post	No Response	No Comment	
Andrew and Ashwell	Letter by post	No Response	No Comment	
Shonki Brothers	Letter by post	No Response	No Comment	
Peter Tew & Co	Letter by post	No Response	No Comment	
Seth's	Letter by post	No Response	No Comment	
ARC Fabrics	Letter by post	No Response	No Comment	
Merlin Properties	Letter by post	No Response	No Comment	
Rai & Moulson	Letter by post	No Response	No Comment	
Ibstock Community Enterprises	Letter by post	No Response	No Comment	

King Sturge	Letter by post	No Response	No Comment	
<b>External=General Contacts 2. LDF database/ file L4.B Companies</b>				
Ancer Spa (Midlands) LTD	Email	No Response	No Comment	
Barton Willmore Planning	Email	No Response	No Comment	
Bidwells	Email	No Response	No Comment	
Blue Sky Planning <b>On behalf of St Georges' Retail Park "the Junction"</b>	Email	<p>The interest of The Junction is in relation to the William Street / Constitution Hill site (known to The Junction as The St Georges Triangle). The area was classified in the Leicester Employment and Premises Assessment Study as being a category D site.</p> <p>Appendix 3 to the Draft SPD includes an area assessment plan . The William Street/Constitution Hill site is omitted from that plan. The site should be shown on the plan as a Grade D in the SPD, in accordance with the 2006 assessment. We agree that this change should be made to the plan and support the modification, which has been informally suggested by officers.</p> <p>Re Paragraph E3, The Junction supports the greater policy flexibility proposed at E3 insofar as it relates to the William Street/Constitution Hill site, subject to: - Employment uses are not confined to those within Class B; and Residential not being restricted to a "smaller element". Whilst it is recognised to be important to provide commercial uses within such areas, equally it is wrong to pre-judge the amount of residential that could be accommodated above commercial uses.</p>	<p>This site (ELS ref 50) has been added to the map in appendix 3.</p> <p>Change wording from "smaller element of residential use" to "smaller proportion of the site for residential use" To reflect the ability to provide residential use on the upper floors. By definition, within this PEA, employment uses have to meet requirements of policy E03, so cannot state that non B class uses are automatically acceptable.</p>	2
GVA Grimley LLP	Email	No Response	No Comment	
CJC Development	Email	No Response	No Comment	

Company				
DLP Consultants	Email	No Response	No Comment	
Donaldsons	Email	No Response	No Comment	
Framptons	Email	No Response	No Comment	
Paul and Company	Email	No Response	No Comment	
Peacock and Smith	Email	No Response	No Comment	
RPS Planning	Email	No Response	No Comment	
Smith Stuart and Reynolds	Email	No Response	No Comment	
Stewart Ross Associates	Email	No Response	No Comment	
United Co-operative Ltd (co-op)	Email	No Response	No Comment	
White Young Green	Email	No Response	No Comment	
<b>External=General Contacts</b> <b>3. LDF database/ file L4.B</b> <b>National / Local Consultees/ Partners</b>				
LABA Leicestershire Asian Business Association LTD	<b>Letter by post</b>	No Response	No Comment	
CBI (Leics county Group)	<b>Letter by post</b>	No Response	No Comment	
Institute of directors	<b>Letter by post</b>	No Response	No Comment	
English partnerships	<b>Letter by post</b>	No Response	No Comment	
British Waterways	Email	No Response	No Comment	

Business Link Leicestershire	Email	No Response	No Comment	
Connexions	Email	No Response	No Comment	
Civic Society (Leicester)	Email	No Response	No Comment	
East Midlands Development Agency	Email	No Response	No Comment	
Friends of the Earth	Email	No Response	No Comment	
Highways Agency	Email	<p>The SPD does not make adequate reference to the development sites' potential impacts on the strategic road network. Reference should be made to the requirement for developers to incorporate measures that seek to improve accessibility and which strengthen the alternatives for linkages by modes other than the private car, particularly for the large employment sites. This would improve the SPD's alignment with the underlying aims of PPG14 and Circular 02/2007 of reducing trip generation.</p> <p>The SPD should make clear that all planning applications for new employment sites will need to demonstrate how the impact on the highway network is acceptable. In particular this should include a requirement for new employment sites to have detailed Transport Assessments including measures to encourage modal shift and the incorporation of Travel Plans. Reference should be made to DfT's Guidance on Transport Assessment.</p> <p>The SPD should include a requirement for developers to consult with the relevant highways authorities prior to the submission of any planning application in order to seek agreement to the Transport Assessments and Travel Plan(s) for the sites identified. The SPD should identify this as a key part of any pre-application discussions.</p> <p>Reference should be made to the council seeking to negotiate contributions in line with Local Plan Policies for any improvements of highways and transportation</p>	<p>Paragraphs added at beginning of section 5 and in section E2 in relation to highway implications and advice on Transport Assessments in new Appendix 4</p>	3
Leicester Shire	Email	No Response	No Comment	

Economic Partnership				
Leicestershire Chamber Of Commerce and Industry	Email	No Response	No Comment	
House Builders Federation National Federation of Builders	Email	No Response	No Comment	
Leicester Regeneration Company,	Email and response email	<p>General comments</p> <p>Section 2, third paragraph references to the structure of the economy (manufacturing vs service sector) – The City’s economy in terms of the number and quality of service sector jobs lags significantly behind regional and national averages – The SPD needs to be amended accordingly with data from LSEP.</p> <p>Section 5, Second bullet – I would interpret this as referring to office development schemes rather than to individual buildings; ie there is a 1000sqm cap per building. If this is not the case then alternative wording suggested.</p> <p>Detailed comments</p> <p>Section 2, 6<sup>th</sup> paragraph, It is worth noting that LRC anticipate a significant increase in relocation activity as more schemes have been in the planning stages during the last few years.</p> <p>Section 5A 6<sup>th</sup> bullet – Suggest rewording to “Colton Square is the first phase of the New Business Quarter and represents an example of the type of accommodation that needs to be located in the New Business Quarter under policies E05 &amp; PS05.”</p> <p>Section 5B 2<sup>nd</sup> bullet – “A” Grade is a commonly used definition of office space too – might be worth stating this is different from A grade as per the BE Group study to avoid confusion.</p> <p>Section 5C final bullet point – wrong complementary.</p> <p>Section E2, middle of page 13</p>	<p>Figures amended.</p> <p>Last 2 paragraphs deleted.</p> <p>Additional land for relocations is LDF issue not SPD.</p>	4

		<p>Is Nature Conservation/Flooding advice etc...Necessary?  Section E4 interpretation of E03 – the criterion aren't strictly mutually exclusive, it's just that you only have to meet one to pass the test.  Criterion a) of Policy E03, Second point (top of page 15) found sentence unclear  Criterion b) Suggest you need to delete the word 'ancillary' in that sentence? (i.e there must be a principal existing or proposed B1,2 or 8 use.  Criterion D) – missed 3 from the policy reference.  Further comments  Figures were published recently on job growth in UK cities, Leicester was in last place and the only place actually showing an actual reduction.</p>	<p>Yes this advice is necessary.  Wording amended    Done    Done    Noted. Not necessary to include.</p>	
<b>4. Adjoining Authorities</b>				
Blaby District Council	Email	No Response	No Comment	
Charnwood Borough Council	Email	No Response	No Comment	
Harborough Council	Email	<p>Further explanation is needed in the objectives and status of the document to explain the relationship between Local Plan policies, the Employment Land (ELS) and the SPD  A diagram could be used to explain that the SPD seeks to apply the criteria of relevant Local Plan Policies to specific employment sites on the basis of the grading of sites identified by ELS.  Add a sentence to explain that the SPD is an interim measure, designed to give weight to the outcomes of the ELS, pending a full review of policy through relevant DPD's.  Clarify how long the relevant Local Plan policies will be saved for and when they are expected to be replaced, and which document the replacement policies will be in.  In addition to Table 1, it would be useful to identify which sites fall within each grade. Also it would be useful to include the</p>	<p>Add sentence at end of first paragraph 'Local Plan policies will be reviewed through the development of the Local Development Framework (LDF) and this may result in a change in policy and therefore a review of this SPD'    Sites grades already clearly identified in map1 appendix 3  Area assessment template = "criteria" added at end of section 3.</p>	5

	<p>criteria used in the ELS to assess individual sites, in order to clarify the definitions set out in Table 1.</p> <p>Include the relevant scoring for each grade to help the reader to understand the types of sites falling within each of the grades which is particularly important in relation to those sites falling within grades D and E given the policy stance taken later in the document.</p> <p>Neighbouring authorities, including Harborough, may have concerns should the intention of the SPD be to allow re-development of lower quality employment sites (Grade D &amp; E) for residential purposes. Harborough would not wish to see the loss of the Cities ability to accommodate the types of employment uses that may be present on sites of D and E grade within Leicester City as the effect of this may mean such uses are dispersed to neighbouring areas which are potentially less suitable.</p> <p>It is unclear from the definitions of grade D and E sites at present, whether this is the intention of the policy, or whether it only refers to long term vacant sites which are no longer required for employment uses. Harborough would support the re-use of lower quality sites. The need to further clarify the types of sites referred to within these grades may help to alleviate concerns about the loss of these sites.</p> <p>Section 5</p> <p>Suggest adding an introductory sentence/paragraph to aid understanding of this section. It is unclear whether the section relates to employment allocations, existing employment uses, proposed employment uses or all three.</p> <p>Suggest removing the A,B,C used for sub-sections to avoid confusion with site grading A-E.</p> <p>Appendix 1: Policy Context</p> <p>Suggest removing reference to PPG3 update since this has been superseded by PPS3. The summary of PPS3 could be expanded to include its main objectives and explain that the context of the quote is the emphasis placed on the use of</p>	<p>There was not any additional scoring beyond the grades given. The individual assessment template for all 96 sites assesses are set out in full in appendix 7 of the ELS, which is far too large to replicate in this document. The grades are already clearly identified in map1 appendix 3</p> <p>The employment land study suggests that permitting other forms of development on the employment sites categorised as D and E would not disperse development outside Leicester City as enough land would be provided through sites categorised A-C. This analysis will be subject to review thought the development of the future Site Allocation Development Plan Document of the LDF.</p> <p>The definitions of type D/E and E land in table 1 clearly refers to very poor quality areas with widespread vacancy and dereliction.</p> <p>Introductory paragraph added to section 5.</p> <p>Changed section headings from letters to roman numerals</p> <p>Removed reference to PPG3.</p>	
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		<p>previously developed land. Suggest removing sections B2, B3 and C which make reference to QUELS, Roger Tym Study and the SQW study, or creating a separate section referring to them as 'Relevant Studies'. These are not policy but evidence gathering studies.</p> <p>Harborough would wish to see amendments to the wording in this section. In particular the second paragraph implies that all authorities have accepted the recommendation of the study in relation to the identification and allocation of strategic sites, which is not the case, the documents will contribute as an evidence base for preparation of the LDF. Would suggest removing the 2<sup>nd</sup> half of the 2<sup>nd</sup> paragraph. Suggest changing the 3<sup>rd</sup> paragraph so it is replaced by the conclusion from the SQW study itself. (paragraph 7.24 of the study) Change publication date of first paragraph to 'September 2006 Version released 26/06/2007)</p> <p>General Comments It would be useful to include some commentary to explain how the policy measures put in place through the SPD relate to future development in the City, as required by the emerging regional plan. In particular it is unclear how the relaxing of policy on low quality employment sites relates to the high level of housing growth will generate a need within the city required by the Regional Plan. Clearly such growth will generate a need for employment opportunities and such need will require provision to be made across the entire range of employment uses and sites from prestigious uses and sites to lower quality uses and sites providing local employment opportunities. This future need should not be lost sight of in the drafting of the SPD.</p>	<p>Have clarified in title to section that it also includes relevant studies..</p> <p>Revised wording as suggested</p> <p>Done</p> <p>Done</p> <p>An SPD is not the appropriate place to address this much wider strategic issue of future employment land supply in the city which will be dealt with through the LDF.</p>	
Leicestershire County Council	Email	General comments Leicestershire County Council officers welcome the SPD that essentially sets out guidance on how the employment land	Noted.	6



		<p>for science and technology users. The availability of good quality industrial land is also constrained, particularly within the city boundaries.</p> <p>Appendix 1 of the document refers to the East Midlands Employment Land Provision Study (2006) – The Study concludes that there is scope for releasing for other uses considerable quantities of employment land, whether comprising allocated development sites or existing sites currently in employment use.</p>	<p>Study findings included.</p>	
<p>Government Office for the East Midlands</p>	<p>Letter by post</p>	<p>I commend the team on the significant amount of work that has gone into this document and on the careful consideration of the evidence to support your proposals.</p> <p>In light of the need to restructure the Leicester economy, I support the approach to identifying Grade D/E &amp; E sites as suitable for redevelopment for housing or community uses, and the identification of Grade D sites as potentially suitable for mixed use development. This could bring forward both modern business premises and help address local housing needs.</p> <p>Against this context, the proposals to protect higher quality designed employment land and premises appear proportionate for current circumstances, subject to future monitoring.</p>	<p>Comments appreciated.</p>	<p>8</p>
<p>The Environment Agency</p>	<p>Letter by post</p>	<p>Flood Risk</p> <p>Following our comments on the 15/01/2007 we are still concerned about flood risk issues on a number of the sites. The documents do not demonstrate how the principles of PPS25 will be used to identify the most appropriate use for those sites that are at risk from flooding nor do they make reference to the Strategic Flood Risk Assessment (SFRA). The Sustainability Appraisal (SA) identifies which sites are at flood risk but does not make clear in which flood zones the sites lie, without this information it is difficult to give potential developers on preferable development for the sites. The SA seems to suggest that all types of development will be</p>	<p>Reference made to SFRA in section 5. plus :-                      "residential development would only be acceptable in the sites identified below where the applicants can demonstrate that the flood risk can be mitigated to the satisfaction of the Environment Agency</p> <p>The level of risk will be established on a site by site basis through more detailed assessment and advice received from the EA as referenced in section 5.</p>	<p>9</p>

		approved on these sites given sufficient mitigation, however PPS 25 is clear in stating it aim to 'ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk' Our previous correspondence made reference to the Sequential test and Exception test but it is not clear in either document how these tests will be applied to the employment land.		
Natural England	Letter by post	No Response	No Comment	10 <i>awaited??</i>
English Heritage	Letter by post	Although I have not had capacity to give a full response to this consultation, the reference to the reuse of Grade D/E buildings on page 13 has been noted. The section on Nature Conservation and the Historical Environment on Page 14 has also been noted as welcomed additions.	Noted.	11
<b>6. proprietors 180 Land Owners</b>				
Freed Of London	Letter by post	Objection to the proposal involving Freed of London's Eastern Boulevard Premises. They employ 85 people over 3 sites in Leicester and a further 150 people in London / Norwich. They are one of the leading manufacturers of ballet and ballroom shoes in the world. The Eastern Boulevard site is an integral part of the business where cutting takes place which feeds premises in Rydell Street, as well as London and Norwich. Losing this site could be detrimental to the business. The Eastern Boulevard site also houses the company car park where company vehicles are securely kept overnight and also the car park helps alleviate the problem of parking for staff, no other premises have this facility.	Spoke to author of letter. Explained that it was not intended to CPO his site and that it was up to the owners to implement any change. This generally allayed his concerns.	12

<b>7. Internal</b>				
Transport, Strategy Regeneration and Culture	Memo	No Response	No Comment	
Director of Partnerships, Performance & Policy	Memo	No Response	No Comment	
Head of Housing Development	Memo	No Response	No Comment	
Also consulted:- Corporate Directors of all LCC Departments And many service directors, list	Memo	No Response	No Comment	
Councillor Follett	Memo	<p>I have an issue/concern about criterion c) of Policy E03. It mentions " a significant number of jobs". I feel this needs further fleshing out. My response on reading it is " yes, but for how long?" So i think there needs to clarity on what we mean by 'jobs'. Temporary employment? Permanent? Involving agency staff? Involving workers from outside Leicester? Short term contracts? Long term contracts? Jobs for 3 weeks? three months?</p> <p>On top of this is the type of employment. I'm not convinced it's enough to just talk about the number of jobs. What if we are replacing 25 relatively skilled jobs with 25 unskilled jobs? I'm not sure what one might propose in its place, I'll rely on you and others for that!</p>	<p>Add at end section E03, criterion C):-</p> <p>4 These would be expected to be permanent full time equivalent posts.</p> <p>5 If information can be provided to show that the comparative skill levels between the jobs would increase for the proposed use, it would be an advantage.</p>	