

# Executive Report to Council

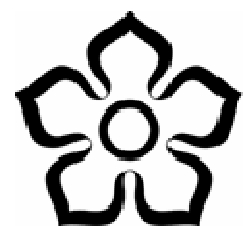
Date of meeting: 19th September 2013

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## Review of Core Strategy Policies, to Enable New Office Development and Employment and Training Opportunities.

Report of the Director of Planning, Transportation and  
Economic Development

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Leicester  
City Council

### Useful Information:

- Ward(s) affected:- Abbey; Castle; Fosse; Spinney Hills ; Stoneygate; & Westcotes
- Report author:- Rachael Mkanza, Senior Planning Officer
- Author contact details:- (29) 7271; [rachael.mkanza@leicester.gov.uk](mailto:rachael.mkanza@leicester.gov.uk)
- Date of Exec meetings:- - Economic Development, Transport and Tourism Scrutiny Commission 4th September 2013  
- Full Council 19<sup>th</sup> September 2013

## 1. Summary

### 1.0 Summary Of Proposals

- 1.1 The proposals outlined in this report are intended to support the delivery of the Economic Action Plan, firstly by providing new development opportunities for offices, to encourage inward investment in the City Centre and secondly by requiring employment and training opportunities to be provided in the construction sector.
- 1.2 It is proposed that major new grade 'A' office development should be allowed throughout the City Centre (see map in **Appendix 3**) and should no longer be restricted solely to the New Business Quarter. (The rationale behind this is set out in paragraphs 3.2 to 3.4).
- 1.3 It is also proposed that specific employment and training opportunities are provided as a contractual obligation, related to large scale major planning applications. (The rationale behind this is set out in paragraphs 3.7 to 3.9).
- 1.4 In order to deliver these requirements, specific amendments need to be made to Core Strategy Policies "CS04 Strategic Regeneration Area" & "CS10 Employment Opportunities", which were adopted in 2010 (and other subsequent changes through-out the document). The proposed changes are set out in Appendix 1. The process that is necessary to make these amendments is set out in section 4 below.
- 1.5 The Public Consultation Stage took place between 11th July and 27th August and included a report to Planning and Development Control Committee. All the Representations that have been received are now summarised in **Appendix 4**.
- 1.6 The City Mayor has recommended that the proposed policy changes shown in **Appendix 1** are reported to Full Council, so that they can be agreed as the final "Submission" documents and submitted to the Planning Inspector to make a decision, after a further statutory 6 week "Submission Consultation" in the Autumn.

## 2. Recommendation(s) to scrutiny

### 2.0 Recommendations

- 2.1 Full Council is asked to agree the City Mayor's recommendation, that the proposed Core Strategy Policy changes, regarding new office development and employment and training opportunities shown in **Appendix 1**, can be incorporated to form the final "Submission" documents, to be sent to the

Planning Inspector to make a decision, after a further statutory 6 week "Submission Consultation".

### 3. Supporting Information

#### 3.0 Proposals

3.1 Leicester City Council proposes to amend specific paragraphs (see **Appendix 1**) of Core Strategy Policies "CS04 Strategic Regeneration Area" & "CS10 Employment Opportunities" (and other subsequent changes through-out the document), regarding a) New Office Development and b) Employment & Training Opportunities in the Construction Sector.

##### a) Office Provision

3.2 The National Planning Policy Framework (NPPF) was published in March 2012. This confirmed (NPPF Para 23, 6th bullet), that "It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites".

3.3 The City Council commissioned the Leicester Office Market Review study in May 2012, to consider options for new office development in the City Centre. Stakeholder events were held, both at the launch and to present study findings (including landowners, developers and occupiers), both lead by the Mayor at Colton Square. The "Executive Summary" of Study is on the website at <http://citymayor.leicester.gov.uk/welcome/leicesters-economic-action-plan/thriving-city-centre/>.

3.4 This recommended that offices should be allowed throughout the City Centre and no longer be restricted solely to the New Business Quarter, as is currently required by Core Strategy Policies CS04 & CS10. (See map defining the boundary of the City Centre in **Appendix 3**).

3.5 The Leicester Office Market Review also identified that parking provision needs to be more flexible for new office development. This recommendation will be included in a new Parking Standards Supplementary Planning Document (SPD) which is due to be published shortly.

3.6 There is no change proposed to the overall floorspace target for office provision in the City Centre, which will remain at 50,000sqm of new grade 'A' offices as set out in adopted Core Strategy Policy CS04.

##### b) Employment & Training Opportunities

3.7 Leicester City Council has developed an Employment and Skills Strategy, which is initially targeted at the construction sector. However, because this has the potential to be expanded to other sectors in the future, the proposed changes to the Core Strategy Policy wording do not restrict this solely to the construction sector.

3.8 The Employment and Skills Strategy includes target outputs for 14 different employment and training opportunity areas from nationally agreed benchmarks that are proportionate to the size and type of the construction activity proposed.

(The benchmarks are derived from the National Skills Academy for Construction (NSAFC) “Client Based Approach” (CBA) which is led and approved by the construction industry).

- 3.9 The proposal is to require the promoters of major planning applications to submit and implement, as part of their construction contract, an approved individual “Employment and Skills Plan” (ESP) with agreed targets for each of the 14 employment and skills benchmarks.
- 3.10 These will require the Construction Industry to provide specific employment & training opportunities that have been agreed on a site by site basis, through 106 agreements on major planning applications.
- 3.11 Benchmarks include the number of jobs created on the project; training for both existing and new employees and would apply to both contractors and sub-contractors in the supply chain. Training opportunities would include apprenticeships, improving NVQ levels, work placement (for 14-16 years old up to graduate level) and other skill development, (such as supervisor training, or Health and safety training). In addition to these national benchmarks there will be a requirement for the contractor to report on levels of local employment & local spend achieved.
- 3.12 This will also enable individuals to complete their training in stages whilst placed or working at a number of different sites. (For example NVQ takes 2 years, or following qualification an individual still needs to gain practical on site experience).
- 3.13 The employment and training opportunities will be required through the planning application process, (for “large scale major” planning applications, see 3.14), by revisions to the wording of Core Strategy Policy CS10. (See **Appendix 1**). Informal guidance has also been prepared to assist developers.
- 3.14 “Large Scale Major” Planning applications include a) For residential development, 200 or more units, or if units are not stated, a site area of 4 hectares or more. b) For all other types of development a floor space of 10,000 square metres or more and if floor space is not stated, a site area of 2 hectares or more.
- 3.15 In addition to the proposals set out above the City Council will also be applying this approach through more effective use of its procurement procedures for all council-led development.

#### **4.0 The Fast Track Policy Review Process**

- 4.1 Under new Government Guidance, limited policy changes can now be achieved in around 6 months, by a process called ‘Fast Track Review of Specific Policy Issues’. A copy of the Planning Inspectorate’s guidance is available at [http://www.planningportal.gov.uk/uploads/pins/local\\_plans/discrete\\_policy\\_review\\_guidance.pdf](http://www.planningportal.gov.uk/uploads/pins/local_plans/discrete_policy_review_guidance.pdf)
- 4.2 This required an initial 6 week public consultation which was held between 11th July and 27th August. Because this is a focused review, the consultation has

been targeted mainly towards the business community and other relevant stakeholders. Comments were also sought from the Planning and Development Control Committee.

4.3 Over 200 individual consultation requests were sent to businesses, landowners and stakeholders as well as statutory consultees. Nine representations have been received as follows:

- Three supporting representations
- Two making no comment
- Two conditional supporting comments - “provided it is not achieved at the expense of potential housing sites”
- One comment requesting clarification and amendment to the wording concerning Sustainability Appraisal
- One objection outlining concerns that the existing New Business Quarter (NBQ) policy should not be replaced prematurely

Responses to these comments and suggested further amendments to the existing Core Strategy policies and supporting text are provided in Appendix 4.

4.4 The next stage after Full Council consideration is the preparation of the final “Submission” documents; a statutory 6 week “Submission Consultation” and time for the Planning Inspector to make a decision. (The proposed timetable is in **Appendix 2**)

4.5 If there are no unresolved objections at the time of submission of the proposed policy revisions to the Inspectorate, the new office policy would be considered through the written representations procedure. (Inspectors time costs around £1,000 per day).

4.6 If there are objections, a hearing would be required. It is anticipated that a 1-2 day hearing could be required. (Hearings cost around £12,000 per day, which includes around 3 weeks of Inspectors time reading evidence and writing up report after wards).

## **5. Financial, legal and other implications**

### 5.1 Financial implications

There are no direct financial implications arising from this report.  
Paresh Radia – Principal Accountant 296507

### 5.2 Legal implications

Reviews of specific adopted policies are governed by the usual plan preparation requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The legal position is as summarised within the main report.

Kylie Chapman, Solicitor, Legal Services 37 1408

### 5.3. Climate Change implications

There are no significant climate change implications associated with this report.  
Charlotte Wood, Senior Environmental Consultant (Climate Change), Environment  
Team 29 8174

### 5.4 Equality Impact Assessment

An equality assessment is not applicable, as the proposals make offices and  
employment & training opportunities more accessible and more widely provided.

### 5.5 Other Implications

n/a

## **6. Background information and other papers:**

n/a

## **7. Summary of Appendices:**

Appendix 1 - Proposed Changes to Core Strategy Wording

Appendix 2 - Draft Timetable - Policy Fast Track Review

Appendix 3 - Map of City Centre

Appendix 4 - Summary of Representations made during initial Public Consultation  
11th July to 27th August 2013.

## **8. Is this a private report ? No.**

## Appendix 1

### Proposed Changes to Core Strategy Wording

a) The *relevant sections* of the existing Core Strategy wording is shown with proposed changes shown in ***bold italic red (inserts)*** and deletions as ~~strike through~~ below:-

To CS04:-

#### CS POLICY 4: STRATEGIC REGENERATION AREA

The Strategic Regeneration Area will be the focus of major housing development and physical change to provide the impetus for economic, environmental and social investment and provide benefits for existing communities. New development within the Strategic Regeneration Area must be comprehensive and co-ordinated, complementing and

building on delivery programmes and Supplementary Planning Documents.

Development will promote:-

- Prosperity and economic growth where regeneration is the focus for major employment development;
- Liveability, with high quality residential neighbourhoods having access to a range of facilities;
- High quality urban environments that provide mixed uses and spaces;
- The potential to live, work, play and enjoy opportunities for leisure and cultural activity;
- Continuing investment in University related projects;
- Improved accessibility to jobs, homes and services and connectivity between areas including the riverside and water corridors, through opportunities for walking, cycling and use of high quality frequent public transport;
- The protection and enhancement of designated and other heritage assets and where the City Council considers appropriate the use of heritage-led regeneration; and
- Protection of existing habitats and enhancement or creation of new areas for wildlife. A comprehensive management and maintenance programme for the canal and riverside will be required, to safeguard the natural environment and increase its ecological value.

The strategy for specific parts of the Strategic Regeneration Area is set out below:-

#### ~~New Business Quarter~~

##### ***Major Office Development***

***At least 50,000 sqm of new grade 'A' office development will be provided in the City Centre. The Office Market Review (2012) identified the need to upgrade the office stock, by either redevelopment, or refurbishment of offices capable of meeting occupier requirements for flexible and energy efficient working environments. New offices will need to demonstrate good pedestrian, cycle and vehicle access. Parking provision will be considered on an individual basis.***

~~The New Business Quarter (NBQ) in the vicinity of the railway station, is the key area for providing office based employment and economic growth in the City. The Council will fully support the NBQ by concentrating new, large floorplate, major office development over 1,000 sqm in that area so that a critical mass of co-located offices is achieved and by promoting Leicester as an attractive place in which to invest. Parking provision will be considered on an individual basis to ensure that traffic flows are compatible with the Local~~

~~Transport Plan.~~

As a thriving prestige office area, the key features will be:

- ~~At least 50,000 sqm of new grade 'A' large floorplate offices; supporting retail and leisure uses; a hotel/conference centre; a new public square; a re-orientated railway station; a new car park; and improved bus and rail integration;~~
- ~~Good connectivity with adjoining areas along key routes to the Central Shopping Core, the Cultural Quarter and New Walk area;~~
- ~~Improved pedestrian, cycle and vehicle access to reduce the severance effect of the Central Ring Road; and~~
- ~~Appropriate transport infrastructure to support delivery of the NBQ and to ensure it can compete against out of town office locations.~~

b) The *relevant sections* of the existing Core Strategy wording is shown with proposed changes shown in ***bold italic red (inserts)*** and deletions as ~~strike through~~ below:-

To CS10:-

## CS POLICY 10. EMPLOYMENT OPPORTUNITIES

The City Council will work with partners to ensure that Leicester has a thriving and diverse business community that attracts jobs and investment to the City. The City Council will also take the following actions:-

### Offices

- ~~Promote development of the New Business Quarter (NBQ) in the vicinity of the railway station. This will be the location for concentrating new high quality (grade 'A'2), large floorplate, major office development over 1,000 sqm, so that a critical mass of co-located offices is established and enhanced.~~

***At least 50,000 sqm of new grade 'A' office development will be provided in the City Centre. The Office Market Review (2012) identified the need to upgrade the office stock, by either redevelopment, or refurbishment of offices capable of meeting occupier requirements for flexible and energy efficient working environments. New offices will need to demonstrate good pedestrian, cycle and vehicle access. Parking provision will be considered on an individual basis.***

~~Allow~~ s ***Small offices will be allowed*** between 100 and 1,000 sqm outside the City Centre in local and District Centres, or where they extend existing offices or where they are part of a mixed use scheme, including a Business Centre (B1(a) at Ashton Green, as part of the village Centre.

### General Economic Growth

The City Council will ***require the developers of major planning applications to provide site specific employment and skills plans*** ~~promote local labour agreements with developers to enable local people in deprived communities to secure employment and~~ ***training opportunities*** ~~and skills development and~~

- The City Council will support local business to reduce their carbon footprint by bringing together business concerned with improving their environmental performance.



c) The *relevant sections* of the existing Core Strategy wording is shown with proposed changes shown in **bold italic red (inserts)** and deletions as ~~strike through~~ below:- In rest of CORE STRATEGY DOCUMENT

#### P7 FOREWORD

The whole of the Leicester community can all share in the successes of projects such as Highcross, Curve, LCB Depot, **Colton Square** ~~Phase One of the New Business Quarter~~ and innovative new housing at Freemans Meadow. Many have been award winning and all have earned the City widespread recognition.

#### P29 LOCATION OF DEVELOPMENT

4.3.2 A key element for the development of the Leicester PUA is the restructuring of central Leicester, focusing on intervention within the Strategic Regeneration Area (SRA) comprising Waterside, Abbey Meadows, St. George's and **new City Centre Office Development** ~~the New Business Quarter (NBQ)~~.<sup>1</sup>

#### P29 Employment

4.3.7. Further investment in ~~the New Business Quarter~~ and the Leicester Science Park at Abbey Meadows will create **a** places of national significance for the creation of high skill, high wage jobs. Offices ~~for small and professional businesses~~ will be encouraged to locate in the City Centre.<sup>1</sup>

#### P31

##### CS POLICY 1. LOCATION OF DEVELOPMENT

2. Significant new employment development will be focused in the following locations:<sup>2</sup>

- ~~New Business Quarter~~ **City Centre;**
- Abbey Meadows Science and Innovation Park; and
- Up to 10 hectares of land at Ashton Green.

3. The City Centre will be the focus for new retailing, leisure, and cultural development, to maximise choice in a central location and to enhance the scale, range, and appeal of the Centre. ~~In addition to offices in the New Business Quarter,~~ **O**ffices for small and professional businesses will be encouraged to locate in the City Centre. Beaumont Leys Town Centre and the district centres will serve local needs.<sup>3</sup>

#### P40 Diagram 7. The Strategic Regeneration Area

~~Delete~~ 4. New Business Quarter

#### P41

4.4.6 ~~Problems with the City Centre office market are compounded because modern offices have been developed out of town, to the detriment of the City Centre, attracting occupiers through freely available parking. The New Business Quarter (NBQ)~~ **The City Centre** is able to take advantage of the proximity of the City Centre's cultural, leisure and retail offer, as well as the availability of public transport. There are opportunities to minimise car parking over the plan period whilst ensuring viability and deliverability in the short term, in order to compete effectively with out of town office locations. It is important to balance Local Transport Plan requirements and City Centre parking need. ~~Allowing large floorplate offices anywhere else in the City would undermine the viability and deliverability of the NBQ.~~

p65 **Table 5: New Employment Provision 2006 –2026**

Location Area (Ha) Floorspace

Ashton Green \* Up to 10 -

Science Park \*\* 6.1 At least 30,000 sqm B1(b)

~~New Business Quarter~~ **City Centre** \*\*\* - At least 50,000 sqm B1(a)

\* The Core Strategy proposes up to 10 ha of additional employment land at Ashton Green (see CS Policies 1, 5 & 10). At least 6 ha have been identified through the masterplanning work and further opportunities for employment provision may emerge.

\*\* There is a total of 6.1 ha of land available for the Science Park. This is likely to provide over 30,000 of B1(b) floorspace (based on the most recent outline consents).

\*\*\* 50,000 sqm of offices includes ~~at least 30,000 sqm next to the station~~, over 9,000 sqm completed at Colton Square **and the remainder elsewhere in the City Centre** ~~at least 10,000 sqm elsewhere in NBQ.~~

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~~4.4.73 Developing the New Business Quarter (NBQ) as a nationally recognised, sustainable office location, to support regeneration initiatives will help to rejuvenate the office market in Leicester.~~ The delivery of a successful City Centre office market is very important to Leicester's future.

4.4.74 The ~~NBQ~~ **City Centre** is able to take advantage of the availability of public transport so there are opportunities to minimise car parking over the full plan period whilst ensuring viability and deliverability in the short term. This combined with the draw of an attractive place to work and the retail and leisure opportunities that the City Centre offers, will enable ~~the emerging New Business Quarter~~ **Leicester** to compete effectively with out of town office locations.

P67 **Diagram 10. Office Areas**

~~Delete~~ 4. New Business Quarter

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~~4.4.80 These developments are complemented by improvements to the main City Centre thoroughfares and the New Business Quarter being developed around the rail station, which will take advantage of the City's new links with Europe.~~

P73 **Diagram 12. City Centre**

~~Delete~~ 4. New Business Quarter

P75

CS POLICY 12. CITY CENTRE

4. Developing an economically prosperous Centre through the location of small offices and creative industries ~~to complement the New Business Quarter~~ and supporting related uses including new hotels and conference venues.

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**Appendix 2. Replacement of Local Plan Policies**

This table identifies the City of Leicester Local Plan (2006) policies that will be replaced by a Core Strategy policy or saved until they are replaced by the Site Allocations and Development Management Policies DPD.

~~PS05 Central Office Core (New Business Quarter)~~

**P120 Appendix 7: Infrastructure Schedule**

CS Policy 4 – Strategic Regeneration Area – ~~New Business Quarter~~, Abbey Meadows, The Waterside, St. George's South, St. George's North, St Johns.

P121 delete whole page ~~New Business Quarter Primary Infrastructure~~

**Appendix 8. Glossary**

~~NEW BUSINESS QUARTER~~

~~An area between the railway station and city centre where large office development will be focused.~~

## **Appendix 2**

### Policy – Fast Track Review - Final Timetable

Date	Task
	<b>1 - “Public Consultation” Phase</b>
11 <sup>th</sup> July / 27 <sup>th</sup> August 2013	Public Consultation 6 Weeks
7 <sup>th</sup> August 2013	Planning & DC Committee as part of Public consultation
August 2013	Summarise outcome of consultation and any resulting amendments
	<b>2 - “Submission” Phase</b>
28 <sup>th</sup> August 2013	City Mayor’s Recommendation
4 <sup>th</sup> September 2013	Scrutiny
19 <sup>th</sup> September 2013	Full Council (under the constitution this is an amendment to the Development Plan,)
October/ November 6 weeks	“Submission” Public Consultation 6 Weeks  (all comments go directly to Inspectorate)
December 2013	Submit final documents to Inspector
January 2014	Inspector makes decision by Written Representations if no unresolved objections
January 2014 (have reserved provisional Hearing date with Inspectorate)	Inspector makes decision by 2 day Hearing if any unresolved objections (Hearing may not be required) <i>Need to advertise any hearing for 3 weeks previously.</i>
February / March 2014	Decision - Inspector’s report Received (6 weeks if Written Representations; Longer – reporting date agreed if Hearing)
Spring 2014	Write to objectors press notice = <i>need to give 3 weeks notice to adopt</i> Adopt Revised Core Strategy Policies

### **Appendix 3**

A map showing the extent of the boundary of the City Centre is attached.

#### **Appendix 4**

Summary of representations received (over 200 emails were sent out). Public Consultation took place between 11th July and 27<sup>th</sup> August 2013.

Date received	From	Summary	Reply On Comments
12 July 2013	Warwick Business Management Ltd	The revised wording is fine.	Welcomed
18 July 2013	Highways Agency	We have no specific comments, given the location of the City Centre in relation to the M1 and the scale of the proposals, it is not anticipated that the revised core strategy wording will have a significant impact on the Strategic Road Network and in particular Junction 21 of the M1.	n/a
25 July 2013	Natural England	I can confirm that we do not have any comments.	n/a
7th August 2013	Planning and Development Control Committee	Members considered the report and commented that any changes that strengthened the position for training and employment opportunities for local people would be beneficial. Comments were also made that the changes would help to address concerns previously expressed by a member of the committee that there was insufficient office space in Leicester.	Welcomed

15 August 2013	Charnwood Borough Council	<p>Please be advised that the Borough Council wishes to record its support for the proposed changes to the City of Leicester Core Strategy, as set out in your letter of consultation, provided the more flexible approach to the delivery of Grade A office space across the city centre is not achieved at the expense of potential housing sites required to satisfy the City Council's contribution towards identified needs across the Leicester and Leicestershire Housing Market Area.</p>	<p>The intended level of office provision has not increased above the total of 50,000sqm (10,000sqm of which has already been built at Colton Square).</p> <p>The impact of this policy change is unlikely to be significant on the delivery of housing, given the small amount of sites that will be required. It therefore won't prevent housing being developed within the majority of the city centre.</p> <p>It has also opened up the NBQ area, which was previously reserved for offices for housing development.</p> <p>Under permitted development rights, residential development can be provided in any existing office for the next 3 years, so there will be many increased opportunities to provide residential development in the City Centre.</p>
16 August 2013	Harborough District Council	<p>HDC welcomes the proposed changes to CS04 and CS10 recognising their potential to the support inward investment and improve employment/training opportunities respectively to benefit of the Leicester and wider Leicestershire economy.</p>	<p>Welcomed</p>

27 August 2013

Bob Woollard  
(Associate)  
CAPITA SYMONDS

The Leicester office market review has clearly demonstrated that there is more than one office market operating within the city region, with city centre offices having a different range of demand requirements to those located outside of the city centre.

The demand requirement for offices outside of the city centre market can be met on out of centre sites as appropriate subject to the sequential assessment and impact assessment as set out within the NPPF. However, the imperative for the city is to regenerate the Strategic Regeneration Area and in particular the New Business Quarter.

The policy CS04 as existing, has very strong economic regeneration and sustainability justification. The Leicester office market review has not changed the planning objective of the policy, but simply highlights the demand requirements of developers. It notes that supply is primarily inhibited by economic factors rather than sites being unsuitable for development or market demand. This will inevitably improve as the economy improves. The proposed change to policy is a knee jerk reaction to difficult economic conditions. The policy has not been given the time nor the opportunity to prove its worth in effecting city centre regeneration.

The revision seeks to prematurely ditch the policy, like ditching a premiership football manager after a couple of difficult seasons –

This is not correct, The Leicester Office Market Review has actually demonstrated that there is one office market operating containing the sub markets of City Centre and Out Of Town Sites. It does however conclude that different office products are likely to come forward in these two locations.

The revised policy will still enable City Centre Regeneration.

The NBQ policy has been given adequate time and opportunity to prove its worth in effecting City Centre regeneration, since it has been in adopted policy for over 7 years since 2006 and in draft form for over 10 years since 2002.

		<p>the policy needs time and commitment in order to deliver effective regeneration of the this key area of the City centre.</p> <p>As such we object to the policy as proposed and the resultant Core Strategy would be unsound as being ineffective in delivering regeneration and unjustified in the context of evidence from the Leicester office market review.</p>	<p>This is incorrect, as the evidence in the Leicester office market review actually proposes and supports the changes.</p>
<p>27 August 2013</p>	<p>English Heritage</p>	<p><b>a) Proposed Revision of Policy CS04</b></p> <p>The proposed revision potentially creates greater uncertainty in terms of impacts on Leicester’s historic environment, as new office development could be located anywhere within the city centre (with its many heritage assets both designated and undesignated).</p> <p>We note that the Sustainability Appraisal considers the impact to be positive in terms of the historic environment (SA Objectives 3 and 7) by allowing opportunities for historic buildings to be brought back into use and the potential for areas to be enhanced through focused regeneration. This may be the case, providing that “new grade ‘A’ office development” can include the sensitive refurbishment of existing buildings and areas.</p> <p>Some clarification on what is meant by grade ‘A’ office development would be helpful, along with an explanation of the potential physical requirements of such</p>	<p>Agree to revise the Sustainability Appraisal to note that although more historic buildings may be brought back into use, some may not be suitable due to the stringent requirements of A grade development.</p> <p>There is no set definition on the grading of office space, but Class A space can be characterized as buildings that have excellent location and access, attract high quality tenants, and are managed professionally. Building materials are high quality and rents are competitive with</p>



		<p>schemes.</p> <p>On the other hand, new development anywhere in the city centre could have negative impacts on the significance and setting of a greater number of heritage assets than those in the NBQ area depending on its location. We accept that this will depend on which sites come forward and how developments are designed, but it remains an important consideration.</p> <p>The existing wording of Policy CS04 with regards to protecting and enhancing heritage assets etc (7th bullet point at the start of the policy) will help to reduce negative impacts, although the wording only relates to the Strategic Regeneration Area (SRA) rather than the city centre. It seems slightly odd to include the new wording on major office Development in Policy CS04, when it could fit in Policy CS12 on the city centre. Most of the city centre lies within the SRA, but some parts do not, especially to the south-east around New Walk.</p> <p>This could mean that major office development outside of the SRA but within the city centre does not have to adhere to the bullet points at the start of Policy CS04, including the one relating to heritage assets. In reality, the wording of Policies CS10, CS12 and CS18 appear to provide sufficient requirements with respect to heritage assets, but it would be worth</p>	<p>other new buildings. They wouldn't therefore have any set physical requirements.</p> <p>The City Centre Policy CS12 deals mainly with retail development and is not therefore the best location to put all the information about offices. However, it is noted as a result of this representation, that minor changes need to be made to CS12 as follows:-</p> <p>Also suggest we amend:-</p> <p><b>CS POLICY 12. CITY CENTRE</b>  <b>4. Developing an economically prosperous Centre through the location of small offices and creative industries to complement the New Business Quarter and supporting related uses including new hotels and conference venues.</b></p> <p><b>And also amend any other references in the Core Strategy from "NBQ" to "City Centre" and amend core strategy diagrams 10 &amp; 12 to delete to NBQ boundary. (see new section c in Appendix 1)</b></p> <p>Development outside the SRA would be covered by Policy CS18 "Historic Environment" and therefore provide adequate protection to historic buildings outside the SRA.</p>
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		<p>considering whether the proposed revision of Policy CS04 creates any loopholes.</p> <p><b>b) Proposed Revision of Policy CS10</b>  See above for our comments relating to the proposed revision to the New Business Quarter (NBQ) section of Policy CS10. Again, we assume that existing wording in Policies CS12 and CS18 will help to ensure the conservation of heritage assets. The deleted text in Policy CS10 appears to only relate to the first bullet point under the Offices heading, when the following bullet points in the existing policy also relate to the NBQ. It is not obvious whether the NBQ designation is to remain in any form within the amended Core Strategy (including in Diagrams 10 and 12), so clarification would be helpful. We have no comments to make on the other revision to Policy CS10 relating to employment and training opportunities, although it could potentially allow for improved skills in building conservation if a major planning application involved works to a historic building (perhaps this could be picked up as a positive effect in the relevant part of the sustainability appraisal).</p>	<p>Agree to revise the Sustainability Appraisal to note that it could potentially allow for improved skills in building conservation if a major planning application involved works to a historic building.</p>
27 August 2013	Leicestershire County Council.	The likely implications of the proposed revisions to the two specified CS policies; on the whole we are supportive of the revisions because of the potential economic benefits they could bring, but just have the following reservations:	Welcomed

		<ul style="list-style-type: none"> <li>• In relaxing the current approach to the location of grade A office development there is potential for residential sites to come forward for grade A office use instead of residential. The implication of this is that further housing could need to be provided elsewhere in the PUA outside the City's administrative boundaries. Given the market conditions which still prevail the impact in reality will be slight if none existent; however, given we need to consider the impact across the whole plan period (hopefully the current economic climate will not prevail in the longer term) reassurance that the delivery of residential development will not be adversely effected is sought.</li> <li>• Grade A office development was focused in the New Business Quarter, close to the railway station, thus providing the opportunity to use rail as a key mode of transport to serve the grade A office development. This relationship is weakened with the proposed relaxation to locate grade A office space throughout the City Centre, which is likely to result in more car journeys.</li> <li>• The second policy which is asking developers to provide specific employment and skills plans again is supported but it would be useful to know and make clearer how this would be monitored.</li> </ul>	<p>The impact of this policy change is unlikely to be significant on the delivery of housing, given the small amount of sites that will be required. It therefore won't prevent housing being developed within the majority of the city centre.</p> <p>It has also opened up the NBQ area, which was previously reserved for offices for housing development.</p> <p>Under permitted development rights, residential development can be provided in any existing office for the next 3 years, so there will be many increased opportunities to provide residential development in the City Centre.</p> <p>The City Centre is still preferential location sequentially for travel above any other out of centre location.</p> <p>The "Skills Plans" will be supported by a web page and informal guidance, and that provides further information on how this will be monitored.</p>
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