

SOUTH EAST LINCOLNSHIRE LOCAL PLAN: EMPLOYMENT PAPER (APRIL 2016)

1 THE SPATIAL STRATEGY

1.1 Policy 2 of the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016) identified a settlement hierarchy; areas where development is to be directed (the Sub-Regional Centres and the Main Service Centres); areas of limited development opportunity (the Minor Service Centres); areas of development restraint (the Other Service Centres and Settlements); and, the countryside. This included provision of land for employment use (B1, B2 and B8 uses).

1.2 **Comments received** - The following comments were received in relation of employment provision in the settlement hierarchy:

1. any future development should be concentrated in those areas which are least likely to be of further detriment to existing traffic flows;
2. many businesses are required to employ significant numbers of staff on a seasonal basis. The local workforce is not able to provide the numbers of staff required and businesses are required to employ workers from outside the area. Consequently, employers need to provide temporary accommodation for workers (which may not be occupied all year) but is required annually and has a permanent presence; could be caravans or dwellings and associated infrastructure such as service blocks, small shops, launderettes. Guidance is required for the provision of such accommodation to support rural businesses;
3. it only safeguards employment sites identified in the Policies Map and does not recognise the existence of employment sites in the countryside. This leaves a policy vacuum which fails to provide a safeguard for these important employment sites that contribute to the economic success of the region. Furthermore, this lack of guidance for previously developed land leaves the Local Plan without a specific and applicable policy on the protection of existing uses, the acceptable quantum of development, the possible change of use and the potential development opportunities for employment sites in the countryside, which is contrary to national guidance (para 28 and para 157). Provision should be made to regulate the protection, the redevelopment, refurbishment or extension of previously developed sites in the countryside and/or to allow the conversion, reuse and change of use of such sites to other sustainable uses;
4. appropriately located and diverse employment opportunities should be extended to the villages, where compatible with sustainable development and thereby reflecting national policy;

1.3 **Responses to the above comments:**

1. new development inevitably generates traffic, however the South East Lincolnshire Employment Land Technical Paper 2015 (the ELTP) identifies that potential employment sites are within or adjacent to a settlement boundary of a higher tier settlement, or within 400m of a higher tier settlement boundary to help promote shorter local journeys by vehicles as well as access by sustainable and potentially public transport;
 2. while it is accepted that many local businesses employ a seasonal workforce, it is not accepted that the majority come from outside the area, as may have been the case in the past. Instead, 'seasonal workers' have relocated to the area, and move between jobs rather than between different parts of the country or from abroad. This means that workers have permanent accommodation in the area, so it is considered that there is no longer a need for 'transient worker accommodation' and supporting infrastructure;
 3. although the Local Plan has identified Specific Occupier Sites and sets out a policy relating to agricultural diversification, it is accepted that the approach to employment sites in the countryside should be clarified. This will be addressed through subsequent versions of the new Local Plan;
 4. the Local Plan identifies Local Employment Sites and Specific Occupier Sites in the Minor Service Centres to appropriately complement the level of housing identified in these locations. Intensification and/or expansion of employment sites within the settlement boundary of these settlements as well as Other Service Centre and Settlements will be appropriate subject to detailed design, amenity and access considerations. This is considered to be an appropriate approach to delivering sustainable employment development. However it is accepted that the approach to employment sites in the countryside should be clarified;
- 1.4 It is not considered that the comments made by consultees above justify a change in the approach to employment land provision set out in the Spatial Strategy.

2 SOUTH EAST LINCOLNSHIRE'S EMPLOYMENT LAND REQUIREMENT

- 2.1 Policy 7 of the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016) identified that employment allocations should be made in the Local Plan area to provide for 82ha of land for B1, B2 and B8 uses between April 2011 and 31st March 2036.

2.2 **Comments received** - The following comments were received concerning South East Lincolnshire's employment land requirement:

1. the proposed Bridge Road Main Employment Area, Long Sutton is a modest allocation when compared to the substantial allocation in the adopted and previously adopted Local Plans. Therefore the Local Plan does not promote 'diverse, prosperous, resilient and self-sustaining communities', or 'attracts new business and sources of employment' or 'minimises the need to travel by improving accessibility for all to jobs'. The current Main Employment Area failed because of the cost of providing a ghost island on Bridge Road. The previous allocation failed because it required a new exit off the Wisbech Road/A17 roundabout and a new feeder road. As a result, new employment in Long Sutton over the last 30-40 years was never going to happen, and job creation in Long Sutton over the next 20 years is equally curtailed. A more pragmatic approach is needed;
2. the proposed level of new employment land in Long Sutton is small in relation to the proposed development of 400 homes, implying little local growth over the Local Plan period. Government guidelines direct new housing close to employment opportunities. Otherwise new housing in Long Sutton will be a commuter base for Kings Lynn, Wisbech, Spalding and Boston;
3. no new employer has emerged since 1971 in Long Sutton to offer new jobs in any quantity to this village, or surrounding area. There is no land available to encourage firms to start up a business;
4. support the designation of land for employment uses but the following specific details for each of the named sites should be included: site references (common with the Employment Land Technical Paper), the amount of land available at each location and the specific area available within a site;
5. the Plan takes a conventional approach to the uses appropriate upon employment land (B1, B2, and B8). This is too restrictive to support employment generation. While continuing to balance the needs of B1, B2 and B8 uses, business parks and industrial estates are suitable for a range of uses, which reflect changing trends and activity, such as: Energy and Environmental Technologies; Engineering and Manufacturing; Building Products and Construction (including off site manufacture); Health and Social Care; Creative Industries; Tourism; Leisure and Learning Activities. Some are B uses, a number are sui generis. Business Parks, especially where there is vacant floor space can also accommodate: a local shop; support facilities for business; children's nursery; fitness centres; trade counters; car showrooms; retail activity ancillary to showrooms, themselves ancillary with storage and distribution; appropriately located recycling activity and processing

of materials. A positive, flexible and constructive approach should be taken to reflect changing economic and societal circumstances;

6. opportunities for mixed-use development with Class B, with complementary employment generating uses (A1 - A5, C1, D1 or Sui Generis) have been identified at: Endeavour Park, Boston; Distribution Park, Kirton; Holbeach Technology campus, Holbeach; Spalding Business Park, Wardentree Lane, and Lincs Gateway, Spalding. Whilst it is accepted that some non B-class employment-generating uses are appropriate in such locations, A1-A5, C1, D1 and Sui Generis uses should not be acceptable, subject to their gross proportion covering up to 20% of the site area. This is unjustified and contrary to national policy; it would permit open A1 consents in out of centre locations and would not require new development to carry out a sequential or impact assessment. This could have a significant impact on town centre vitality and viability, leading to higher vacancy levels and potentially meeting the capacity of Boston and Spalding town centres three times over, with high levels of expenditure taken away from the existing centres. A1 use within these out of centre locations should only be acceptable subject to satisfying the sequential and impact tests. A new requirement should ensure that new development must demonstrate that the site cannot reasonably be used for B-class uses or that the site has previously been marketed for such uses prior to permitting A1 consent;
7. there is little provision for new employment within Sutton Bridge. Identified sites (Wingland) should be better promoted for light industry, rather than Power Stations and Gasifiers, which would have minimal environmental impact and enhance rather than detract from more positive developments in the area such as the forthcoming Marina;
8. support the over provision of employment land to ensure that a buffer is provided to ensure that a lower target is delivered;
9. the lack of employment opportunities in Sutterton means that it is a commuter village where you require a car both for business and leisure purposes;
10. concerned as to where new residents would work, there is a lack of employment in Fishtoft;
11. land should be made available for employment in Holbeach near to Peppermint Junction. Doubt there can be enough jobs created for the increase in population;
12. with the projected increase in housing numbers, it is vital that appropriate employment sites are identified and allocated to ensure appropriate levels of job growth in the area over the Local Plan period. Such employment sites should be located in the most sustainable locations with a wide variety of sites available to suit varying needs. It is vital that such sites offer an attractive proposition to inward investment with high quality, well located sites needing to be available. The Local

Plan goes a long way in identifying a suitable range of sites to cater for the potential future employment land needs of the area.

2.3 **Responses to the above comments:**

1. the potential employment sites near Long Sutton (Bridge Road Main Employment Area and Princes/LC Packaging) covers 9.3ha, which is a slight decrease from the adopted Local Plan (12.2ha). It is therefore not accepted that this is modest allocation or that the proposals will not promote the identified national policy objectives. Since the adoption of the 1999 Local Plan national policy has changed significantly; allocated sites must be suitable, available and deliverable over the plan period. The potential employment sites reflected the availability of land in January 2016. The ELTP identifies that the previous allocations have not developed at the rate envisaged (for a variety of reasons) therefore promoting the same allocations as previously may not help deliver sustainable development in Long Sutton over the plan period. However additional sites have been put forward to be considered for employment use in Long Sutton (see Section 6). The Highways Authority have identified that they have 'no concerns with the amount or type of uses proposed or the capacity of the local road network to accommodate such uses';
2. the Peterborough Strategic Housing Market Assessment (SHMA), 2015 identifies that slightly more people commute to work outside the District than commute in. The SHMA indicates that this means that 'the Local Plan should plan for a higher increase in working residents for a given number of jobs than previously, and therefore the number of new homes should aim to provide for that' so it is not accepted that the focus of new homes will be for those working outside the District. The potential employment sites in Long Sutton cover 9.3ha; this is considered to be a suitable amount of land to provide jobs for residents who may choose to live and work in the Long Sutton area, and should appropriately complement the delivery of 580 new dwellings over the plan period. However, additional sites have been put forward to be considered for employment use in Long Sutton (see Section 6) which may lead to the mix of sites being re-visited;
3. the potential employment sites reflected the availability of land in January 2016. However, additional sites have been put forward to be considered for employment use in Long Sutton (see Section 6) which may lead to the mix of sites being re-visited;
4. support for the employment designations is welcome. Changes will be made to the Local Plan as suggested;
5. it is accepted that the approach to mixed-use development should be more flexible and designed to better reflect the needs of the employment sector overall. It is considered that the approach to mixed-

use development should be re-visited to ensure that an appropriate mix of uses can be accommodated in different locations across the Plan area;

6. it is accepted that the approach to mixed-use development should be more flexible and designed to better reflect the needs of the employment sector overall. It is acknowledged that the reference to A1 use, without detailed explanation, was inconsistent with national policy. As such, the approach will be re-visited to ensure that an appropriate mix of uses can be accommodated in different locations across the Plan area, that are in conformity with national policy;
7. national policy identifies that sites allocated in a Local Plan must be suitable, available and deliverable over the plan period. The land identified in Sutton Bridge reflected the availability of sites in January 2016. The ELTP identifies that the previous allocations at Wingland and Sutton Bridge Port have not developed at the rate envisaged. Therefore it is considered that promoting the same amount of land in these locations (that does not meet the needs of the market) would not help deliver sustainable development over the plan period. Wingland has been identified as suitable for all B Use development including light industry;
8. support for the slight over-provision of employment land as a buffer to the minimum 82ha requirement is welcome;
9. the Peterborough SHMA 2015 identifies that slightly more people commute to work outside the District than commute in. The SHMA indicates that this means that 'the Local Plan should plan for a higher increase in working residents for a given number of jobs than previously, and therefore the number of new homes should aim to provide for that' so it is not accepted that the focus of new homes will be for those working outside the District. The potential employment sites in Long Sutton cover 9.3ha; this is considered to be a suitable amount of land to provide jobs for residents who may choose to live and work in the Long Sutton area, and should appropriately complement the delivery of 580 new dwellings over the plan period. However, additional sites have been put forward to be considered for employment use in Long Sutton (see Section 6) which may lead to the mix of sites being re-visited;
10. national policy identifies that sites allocated in a Local Plan must be suitable, available and deliverable over the plan period. The land identified in/adjacent/within close proximity to Fishtoft reflected the availability of sites in January 2016. While it is accepted that no employment sites have been identified in the Fishtoft area, Fishtoft is 1km from Boston settlement boundary and the wide range of employment opportunities that are available there;

11. a potential employment site has been identified at Holbeach Food Enterprise Zone, adjacent to Peppermint Junction. This site covers 16.3ha, therefore it is not accepted that this land, together with existing employment opportunities at Fleet Road Industrial Estate, Holbeach cannot support the level of housing identified; and
 12. support for the approach taken and the mix and location of sites selected is welcome.
- 2.4 It is not considered that the comments made by consultees justify a change to South East Lincolnshire's overall employment land requirement, and consequently it is considered that the Local Plan should continue to seek to identify employment allocations in South East Lincolnshire to provide for at least 82ha of employment land between April 2011 and 31st March 2036.

3 SOUTH EAST LINCOLNSHIRE'S RESIDUAL REQUIREMENTS

- 3.1 **Completions** - Between 1st April 2011 and 31st March 2016, 19.46ha of new employment land was provided in South East Lincolnshire.
- 3.2 **Commitments** (on land outside the settlement hierarchy) - As at 31st March 2016, planning permission was outstanding for the construction of 53.2ha in South East Lincolnshire, and there is no evidence to suggest that these permissions will not be implemented during the Plan period.
- 3.3 **Allowance for choice and flexibility** - In order to plan positively for potential future employment growth it is considered best practice to add a margin of choice/flexibility factor to the land demand forecast calculation. This is an additional amount of land that ensures a reasonable choice of sites for businesses and developers and to allow for delays in sites coming forward or premises being developed. This is not an exact science and will always be open to a degree of subjectivity. In order to ensure there is sufficient choice in the South East Lincolnshire's land supply, an allowance equivalent to three years take-up of employment land would be appropriate (64.11ha) to enable the approach to remain responsive to potential changes and increased market demand that may occur over the plan period;
- 3.4 **Allowance for losses** - an allowance also needs to be made for some replacement of losses of existing employment land that may be developed for other, non B Class uses. It is considered appropriate to base this figure on past trends and recorded losses over the first five years of the Local Plan period. The annual average loss over this period would then be extrapolated forward so 22.2 hectares would be added to the demand calculation to take account of potential losses that might occur over the Plan period.

3.5 **Outstanding requirement** - Given the above figures, and the amount of land that the ELTP considers to be available for Main and Local Employment Use over the plan period, it is considered that 85ha of employment land will be allocated. This is slightly higher than the 82ha identified by the ELTP but it is considered that several greenfield sites may develop at a slightly lower capacity than anticipated to provide a quality business park setting and /or to accommodate supporting infrastructure such as sustainable drainage.

4 **INFRASTRUCTURE**

- 4.1 **Flood risk** – the National Planning Practice Guidance identifies that employment uses are a ‘less vulnerable’ use, so development could be appropriate in Flood Zones 2 and 3 subject to flood mitigation being agreed through a site specific Flood Risk Assessment with the Environment Agency.
- 4.3 Anglian Water has commented that the capacity of the surface water network has major constraints, and that all developments should seek to reduce flood risk and incorporate Sustainable Drainage Systems (SuDS).
- 4.4 **Sewage Treatment** – The Environment Agency and Anglian Water have commented that further work is needed to assess the implications of these allocations for water recycling infrastructure (sewage treatment works).
- 4.5 **Water Supply** – Anglian Water has commented that water resources are adequate to serve the proposed growth. However further work is needed to assess the implications of these allocations for water supply network.
- 4.6 **Electricity Supply** – Western Power has commented that there is limited capacity in most locations, except the Crowland area, so new development may require reinforcement of the network.
- 4.7 **Gas Supply** – National Grid has commented that it is expected that most new development can be managed and completed with the right timing, however the accumulative effects of a large number of loads may well overload the upstream systems and these reinforcements can cause delays in ‘gas on dates’. It is envisaged that any reinforcements will be delivered in a timely manner, subject to specific engineering difficulties.

5 SOUTH EAST LINCOLNSHIRE SITE OPTIONS

- 5.1 The Inset Maps of the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016) identified 67 Existing and Proposed Main Employment Areas', 'Main and Proposed Local Employment Sites', 'Existing and Proposed Specific Occupier Sites' and Existing and Proposed Restricted Use Sites'.

5.2 **Comments received** – The following comments were made on ***Riverside Industrial Estate, Boston:***

1. the de-allocation of 25.2ha of employment land at Riverside should not proceed, particularly the land directly to the North (rear) of the recently constructed Recycling Centre on Slippery Gowt Lane. The existing allocation has infrastructure provided to service it, which was provided at great expense by the landowners at the insistence of Lincolnshire County Council. Having accepted payment, LCC has entered into a formal agreement with the owners to provide infrastructure for light industrial development and to promote the sale of the land for that purpose. For LCC to withdraw from this agreement would leave the owners with no other option than to seek compensation for a broken agreement. Land to the north of the recycling centre should be allocated for light industrial development;
2. to de-allocate land at Riverside is inconsistent with the reasons for its allocation in the first place. To now allocate land where landowners refused to contribute financially to the provision of infrastructure is totally contradictory to established policy;
3. support the identification of land for employment uses to the south of Boston, principally the Marsh Lane and Riverside Industrial Estate area, which has direct access to the A16 without adding to traffic numbers moving through Boston.

5.3 **Responses to the above comments:**

1. the amount of potential employment land proposed for South East Lincolnshire took account of many issues, including: the findings of the South East Lincolnshire Employment Land Technical Paper (January 2016); the existing and predicted population of the area; economic conditions and trends between 2001 and 2016; and the take-up of land for B Use development across South East Lincolnshire and within employment allocations. In the 2016 Riverside Industrial Estate covered 119.7ha and had 40.2ha of available land. Since the adoption of the 1999 Boston Borough Local Plan national policy has changed significantly; sites allocated must be suitable, available and deliverable over the plan period. The allocations reflected evidence available in

2016 and the take-up of employment land at Riverside over the last 5 years. Part of the site referred to has been identified as a potential employment site, to reflect the evidence available but the ELTP identifies that the take-up of land at Riverside and market interest for the available land does not justify the allocation of all 40.2ha. However, it is considered that the information submitted helps promote the whole site to the north of the recycling centre as suitable, available and deliverable for light industrial development;

2. Plot 3 of the submission will be allocated - it is considered that the information submitted helps justify the whole site as suitable, available and deliverable for light industrial development. The amount and phasing of employment growth proposed for South East Lincolnshire took account of many issues, including: the findings of the South East Lincolnshire Employment Land Technical Paper (January 2016); the existing and predicted population of the area; economic conditions and trends between 2001 and 2016; and the take-up of land for B Use development across South East Lincolnshire and within employment allocations. Riverside Industrial Estate covered 119.7ha and had 40.2ha of available land. However the take-up of land and market interest for the available land at Riverside does not justify the allocation of all 40.2ha, (after taking into account the availability and deliverability of other employment land and employment generating land elsewhere in Boston town, the Borough and the Plan area as a whole). The level of provision (with Plot 3) in this location is therefore considered appropriate;
3. support for Riverside Industrial Estate is welcome;

5.4 **Conclusions on Riverside Industrial Estate, Boston** – It is considered that Riverside Industrial Estate is one of the most suitable Employment Sites in South East Lincolnshire, and that it should be taken forward as a Preferred Option Main Employment Site and Allocation:

- the Sustainability Appraisal scores Riverside Industrial Estate with three/13 positive (green) impacts being recorded relating to employment opportunities, education and training and inclusive communities, but a further seven (blue) impacts could deliver positive impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;
- the majority of this site is within Flood Zone 3a, but flood hazard in 2115 is classified as 'danger for all', and flood depth in 2115 is classified as '1-2m';
- the ELTP identifies that the site is 'a significant established employment allocation, with a good critical mass of B-Use and employment

generating development, there is active marketing of the northern, central and south-eastern area, and evidence of recent investment' so if allocated there is a reasonable prospect that the allocations would be developed, and would be able to contribute to the area's employment land target over the plan period;

- the ELTP identifies that 'the vacant plots within the established northern and central area with direct access from the spine road and utilities to the boundary would be deliverable in the short-medium term because start-up costs are likely to be lower. The remainder of the plots are expected to be developed in the medium-long term.' So it can be assumed that viable employment development could come forward if allocated;
- the available land comprises an appropriate mix of sites; small, medium and large brownfield and greenfield land, capable of accommodating local, regional and national businesses over the plan period;

5.5 The following comments were made on the ***Boston Port Estate:***

1. the Boston Dock estate is not recognised as a 'main' or 'local' employment site. An oversight?

5.6 **Responses to the above comments:**

1. the Boston Port Estate is identified as a Restricted Use Site – to promote employment uses that support the unique role the port has – rather than provide for main employment uses;

5.7 **Conclusions on Boston Dock** – It is considered that the Boston Port Estate is one of the most suitable Employment Sites in South East Lincolnshire, and that it should be taken forward as a Preferred Option Employment Site and Allocation for port related uses:

- the Sustainability Appraisal scores the Boston Port Estate with three/13 positive (green) impacts being recorded relating to employment opportunities, education and training, inclusive communities and soil, air and water quality, but a further seven (blue) impacts could deliver positive impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;
- the majority of the site is within Flood Zone 3a, but flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0-0.25m' not the most sequentially preferable site but with less risk than some other sites in Boston town;
- the ELTP identifies that the site is 'an established employment allocation, with a good critical mass of port-related industries and an

operational port, suitable for the current mix of uses' so if allocated there is a reasonable prospect that the allocation would be developed for the continued use;

- the ELTP identifies that 'any allocations should reflect the 'unique long term function that exists,' so the mix of uses should be restricted to port related uses only. As such development is expected to come forward only to meet the needs of The Port Estate over the plan period;

5.8 The following comments were made on **Q2: The Quadrant, Boston**:

1. pleased to note the inclusion of Q2: The Quadrant as an allocated site for employment land because of its strategic economic importance, attractiveness to the market and its ability to accommodate business clusters and high value employment which could stimulate economic growth and diversify the local economy;
2. suggest that Q2 should also be listed as a potential mixed use site. Plans for this site will evolve through the Masterplan and Local Plan process but it has always been promoted as a genuine mixed-use development and hence needs to be recognised as such to provide the flexibility as the plans evolve;
3. support the inclusion of Q2 as a prestige employment site;
4. the developers support the promotion of Q2 through a Masterplan; this will be moved forward as part of the Local Plan process;
5. the location of Q2: The Quadrant, Boston is not clear on the Inset Map.

5.9 **Responses to the above comments:**

1. support for part of Q2: The Quadrant as an employment site is welcome;
2. Q2: The Quadrant is identified as a Sustainable Urban Extension, therefore it is accepted that traditional B-Use development may not be the most appropriate form of development to sit alongside a predominantly residential-led scheme. Mixed-use development including B1 uses may be appropriate in this location;
3. support for the designation as a Prestige Employment Site is welcome;
4. acknowledgement of the need for masterplanning is noted, and the desire to progress this through the Local Plan process is welcome;
5. it is accepted that the location of the employment land within Q2 is not identified by a red line boundary; the precise location will be agreed through the masterplanning process between the developer, the LPA and its partners.

5.10 **Conclusions on Q2: The Quadrant** – It is considered that Q2: The Quadrant is one of the most suitable Employment Sites in South East Lincolnshire, and

that it should be taken forward as a Preferred Option Employment Site and Allocation for mixed use development:

- the Sustainability Appraisal scores Q2: The Quadrant with four/13 positive (green) impacts being recorded relating to employment opportunities, accessibility, education and training and inclusive communities but a further five (blue) impacts could deliver positive impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;
- the site is within Flood Zone 3a, but flood hazard in 2115 is classified as 'danger for all', and flood depth in 2115 is classified as '1.0-2.0m';
- the ELTP identifies that 'the site is in an accessible location, and would be suitable as an employment site as part of the wider strategic urban extension to support the jobs and housing growth expected to be required in Boston in the long term';
- the ELTP indicates that 'opening up costs are likely to be high (because is part of the sustainable urban extension). Nonetheless if it is allocated there is a reasonable prospect that the employment land would be developed but it is likely to be in the long term, linked with the development of the wider site'. So the allocation would be developable, and therefore able to contribute to the area's employment land target later in the plan period;
- a masterplan for the site is in the early stages of preparation in partnership with Boston Borough Council and Lincolnshire County Council. It is accepted that mixed-use development would better complement the development of housing, rather than traditional B-Use development, and would aid delivery.

5.11 **Comments received** – The following comments were made on ***Norprint, Boston:***

1. paragraph 4.1.2 refers to the Norprint factory on Norfolk Street as vacant. These premises are not vacant although it is expected to be during summer 2016;
2. the location, size and condition of the Norprint site, Norfolk Street means it is unsuitable for re-use for employment uses. An outline planning application has been submitted for residential use;
3. the Norprint site, Horncastle Road is identified as an Existing Employment Site; Norprint and Magnadata will have vacated the site in summer 2016 and an outline planning application for residential use has been submitted for the site. Residential use is more appropriate for the site given its size and location and it will help address the current five year housing land supply shortage, whilst not undermining the

employment land supply where Boston Council is understood to have a surplus.

5.12 **Responses to the above comments:**

1. it is accepted that the Norprint site, Norfolk Street is not vacant at present;
2. the Employment Land Technical Paper, 2016 identifies that ‘the building [on Norfolk Street] is extremely poor quality and would require significant upfront investment to either upgrade to meet modern business needs or to demolish and rebuild, which may also lead to remediation works and additional costs. As a result the site has attracted little market interest for sale/let. De-allocate the site for employment use and let the market dictate the future direction of the site in the long term. Could be appropriate for an alternative use.’ It is considered that this supports the owners’ intentions for the site. An outline planning application for residential use is pending;
3. confirmation that the Horncastle Road site is no longer available is noted. An outline planning application for residential use is pending. It is accepted that the site, should planning permission be approved, would contribute to the Boston five year housing land supply, although it is not accepted that Boston Borough has a surplus of employment land, it is considered that the area has alternative sites available for Main Employment Use that are more suitable and deliverable than the Norprint site;

5.13 **Conclusions on Norprint, Boston** - It is considered that Norprint, Boston are not some of the most suitable Employment Sites in South East Lincolnshire, and that they should not be taken forward as Preferred Option Employment Sites:

- the Norprint, Horncastle Road site is no longer available as an employment site so can no longer be considered for employment use in the Local Plan;
- the Norprint, Norfolk Street site was not identified as a potential employment site in the Local Plan, which reflects the owners intentions.

5.14 The following comments were made on ***Wardentree Lane, Spalding:***

1. many businesses operate in Wardentree Lane, some of which have inadequate parking facilities for employees and visitors, with parking spreading onto roads and pavements. Development in the Proposed Employment Area should address parking, particularly when an element of traffic from the Vernatts SUE will travel through Enterprise Way and Wardentree Lane;

2. support for Wardentree Lane as Proposed Main Employment and Existing Employment Areas;
3. the Inset Map should be annotated with the relevant site reference numbers listed in Policy 7;
4. the Technical Paper has identified specific conditions relating to the local market in respect of employment land and premises, such as the tendency to design and build rather than build and sell. It also states that vacant units are unlikely to meet the changing needs of economic development in the area; the owners conclude that there is a need to maintain a supply of large, readily available sites, including land at Elsoms Way and Wardentree Lane; both have planning permission, are available for development, are highly accessible, have a high profile, are readily serviced and provide sites that would support the economic development of South Holland and South East Lincolnshire.

5.15 **Responses to the above comments:**

1. vehicle parking will need to be delivered in accordance with relevant Local Plan policies. These matters will be addressed through the design of new development and the planning application process;
2. support for Wardentree Lane Existing and Proposed Main Employment Areas is welcome;
3. it is accepted, that for clarity, site reference numbers should be added to the Policies Map to provide a suitable link to the relevant Local Plan policy;
4. support for sites at Wardentree Lane and at Elsoms Way is noted. The Employment Land Technical Paper, 2016 identifies that large sites with planning permission such as Elsoms Way are more likely to be developed for design and build and that vacant premises may not always be appropriate to meet the needs of the market. It is acknowledged that both sites have planning permission for employment development. The ELTP states that the Main Employment Area 'is adjacent to the A16, a strategic north-south route. There is direct access to the A16 from Wardentree Lane via a network of spine roads and junctions. Each plot has direct access onto either a spine road or subsidiary route. The mix of local non-commercial traffic with HGVs does not constrain vehicular movements, ... the site is an established high profile strategic employment allocation, with a 440m frontage to the A16, is a popular site, with low vacancy levels, excellent critical mass of multinationals, national and local occupiers and employment uses'. It is therefore accepted that these sites could support the economic development of the Plan area, once developed;

5.16 **Conclusions on Wardentree Lane, Spalding** – It is considered that Wardentree Lane is one of the most suitable Employment Sites in South East

Lincolnshire, and that it should be taken forward as a Preferred Option Main Employment Site and Allocation:

- the Sustainability Appraisal scores Wardentree Lane with four/13 positive (green) impacts being recorded relating to accessibility, inclusive communities, education and training and employment opportunities, but a further four (blue) impacts could deliver positive impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;
- the site is within Flood Zone 3a, but flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard';
- the ELTP identifies that the site is 'an established high profile strategic employment allocation, with a good 440m frontage to the A16. A popular site with low vacancy levels, excellent critical mass of multinationals, national and local occupiers and other employment uses. Signs of recent investment, actively managed and vacant units actively marketed' so if allocated there is a reasonable prospect that the allocations would be developed, and would be able to contribute to the area's employment land target over the plan period;
- the ELTP identifies that 'planning permissions exist for several sites which indicate suitability for ongoing employment use...most available infill plots could be delivered at relatively low cost, access could be taken from a spine road and utilities could be achieved within normal build costs, potentially within the short-medium term. Some sites on West Marsh Road may require further investment to deal with site specific issues such as remediation or more significant utilities upgrades. The extension to Wardentree Lane will require significant upfront investment to deliver a new spine road, utilities upgrades and flood mitigation so are more likely to be developed in the medium-long term' so if allocated it can be assumed that viable employment development could take place over the plan period;
- as a significant Main Employment Area, the ELTP recognises that 'further non B-Uses should be limited so as to discourage prestige employers from locating there', this should help ensure that the location remains attractive to B-Use development over the plan period;
- the available land comprises an appropriate mix of sites; small, medium and large brownfield and greenfield land, capable of accommodating local, regional and national business over the plan period.

5.17 **Comments received** – The following comments were made on ***Clay Lake, Spalding:***

1. support the identification of Clay Lake as a Main Employment Area. This site has planning permission for 10.5ha for B1, B2 and B8 uses;
2. the owners consider that the site is ideal for industrial and distribution development, has an excellent connection to the local highway network from the newly constructed access to the A16, and is capable of accommodating a high number of HGV trips from the 10.5ha site but also from existing businesses, and from the traffic which would be generated by the development of the land to the north;
3. it is well separated from the nearest housing;
4. the businesses are generally successful and locally based, and it is sensible to enable their expansion on to adjacent land. The proposed Main Employment Area allows for some expansion, but it leaves an area of disused buildings, between Clay Lake, the Coronation Channel and Childers South Drove, which is suitable for employment use - enquiries have been received from major local and international companies;
5. a planning application is expected to be submitted during the spring/summer of 2016, as part of a commercial rebranding of the site as the East of England Industrial Hub. Proposals are also being prepared which would enable the expansion of existing businesses, such as Fesa, and allow for the development of a new industrial estate on the adjacent land;
6. the owners indicate that the Proposed Main Employment Area is deliverable within the early part of the Plan period. Extensive work has already been undertaken in relation to technical investigations;
7. greater flexibility should be permitted on Main Employment Areas to allow the provision of other uses which have a synergy with main B class employment use, such as a cafes (A3 use) and sui generis development (industrial processes), or a truck stop which fall outside of the definition of a B2 use.

5.18 **Responses to the above comments:**

1. support for Clay Lake Main and the Proposed Employment Area is welcome. The Employment Land Technical Paper, 2016 identifies that planning permission has been approved for the 10.5ha extension for B uses;
2. the ELTP identifies that the site is 'adjacent to the A16, a strategic north-south route ... each plot has direct access, of varying quality to Spalding Drove, which is a local road. Internal road access is a little disjointed, but acceptable...planning permission for the extension would provide direct access to the A16. The junction is in place but the spine road has not been delivered yet. Its provision would considerably improve access to the site.' So it is not accepted that the Proposed Main Employment Area has an excellent connection to the local

highway network, but it is accepted that should the site be developed, direct access to the A16 would be provided;

3. the ELTP identifies that there are a few residential properties interspersed with employment uses along Spalding Drove, but it is accepted that in general Clay Lake is separate from Spalding's housing areas;
4. the Employment Land Technical Paper only considered land that was known to be suitable, available and deliverable in January 2016, therefore the northern extension was not considered (for further details see Section 6);
5. confirmation that a planning application is expected to be submitted in summer 2016 is noted;
6. the owners vision for the Proposed Main Employment Area is noted, and the timescale for delivery is welcome;
7. it is accepted that the approach to mixed-use development should be more flexible to better reflect the needs of the employment sector overall. As such the approach will be re-visited to ensure that an appropriate mix of uses can be accommodated in different locations across the Plan area;

5.19 **Conclusions on Clay Lake** – It is considered that Clay Lake is one of the most suitable Employment Sites in South East Lincolnshire, and that it should be taken forward as a Preferred Main Employment Site and Allocation:

- the Sustainability Appraisal scores the sites with three positive (green) impacts being recorded relating to inclusive communities, education and training and employment opportunities but a further five (blue) impacts could deliver positive impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;
- the ELTP identifies that 'the site is an established employment site, in an accessible location with a good critical mass of employment uses, suitable for the current uses and occupiers or for other B Uses. Some recent investment. Planning permission to intensify and extend the site indicates the ongoing suitability of the site for employment use'. So this suggests that there is a reasonable prospect of employment development taking place in this location over the plan period;
- the ELTP identifies that 'there will be significant upfront costs associated with this site; a spine road, provision/extension of utilities infrastructure, flood mitigation, servicing and landscaping will be required. Although the site has planning permission and the turning head has been provided, reserved matters need to be submitted, and development is likely to depend on demand so delivery is expected to be in the medium-long term'. Even so, if allocated it can be assumed

that viable employment development could take place in the plan period;

- the site is within Flood Zone 3a, but flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.50-1.0m';
- no objections to the site's allocation were made.

5.20 **Comments received** - The following comments were made on the ***Lincs Gateway***:

1. the developer supports the identification of the Lincs Gateway as an employment site, particularly identification as a Prestige Employment Site;
2. planning permission exists for an employment-led development incorporating supporting uses such as a conference centre, hotel, public house and café. It will boost the local economy, create employment, help resist the loss of employment to other towns, diversify the economy, provide employment in sectors new to the area and retain skilled young people in the town;
3. over £1m has been spent on infrastructure to enable this development to take place. Unforeseen technical issues have delayed delivery, but these have been overcome, highways access is in place, the supporting infrastructure is under construction and several end users have been identified. The proposed supporting infrastructure would meet an identified shortfall in local provision, which constrain business development in the town;
4. the intention is for the Lincs Gateway to offer office and skills based development, and be office-led under B1a and B1b, but the planning permission is flexible and allows for any configuration of B Uses;
5. a landscape led campus is envisaged to provide a high quality environment for a large amount of office development at the front of the site (25,000sqm) to provide about 2500 new jobs. But it is important that uses that might be bad neighbours should be located some distance from office uses. Propose relocating B2 and B8 uses to Clay Lake which would leave a large amount of space for alternative uses, such as retail or housing, which would not detract from the quality of the site. Comparison retail could be accommodated provided that it was delivered as a subordinate occupier to the employment uses. New or relocated sports facilities could also be provided;
6. diversifying the uses could help support the delivery of a bus service and pay for improvements to the B1173 footpath;
7. consider that the site has the potential to accommodate other complementary B1 uses such as education and research, potentially

leading to clusters of specialist enterprises to benefit the existing local agricultural sector;

8. the site is being actively marketed and has received enquiries from national, regional and local companies. A detailed scheme is being prepared;
9. there is no longer the need for such a large area of employment land so limiting uses which do not fall into B uses to a maximum of 20% of the site would be inflexible. Provision should allowing for alternative uses, and the proportion of alternative uses permitted on a site by site basis;
10. the Lincs Gateway will create the employment needed for the area. Improving transport links will bridge the gaps for employers to allow workers to commute from Peterborough, Lincoln, Wisbech, and Kings Lynn hubs.

5.21 **Responses to the above comments:**

1. support for the Lincs Gateway as an employment site, and as a prestige employment site is noted;
2. the Employment Land Technical Paper, 2016 identifies that planning permission exists for the site, and for the uses identified;
3. it is accepted that infrastructure has been delivered, albeit at a slower rate than anticipated. It is accepted that the provision of some facilities such as a conference centre would enhance Spalding's offer in the economic sector;
4. the developers intention to deliver an office and skills based led development is welcome, and it is accepted that the planning permission provides for a mix of B Uses;
5. the developers intention to create a landscape led campus to include 25,000sqm of office floorspace and 2,500 jobs is welcome. The supporting information accompanying the planning permission indicated that it is possible to create a landscape campus primarily for offices, but with B2 and B8 uses, without having an adverse impact upon the amenity of the office space. The appropriateness of housing and retail development in this location will be considered by the Spalding Housing Paper and Spalding Retail Paper respectively. The requirement for sports facilities will be considered by the Infrastructure Delivery Plan;
6. it is considered that the provision of a bus service to the site and delivery of a footpath could also be supported by a range of B Uses and the other uses that have been identified through the planning permission;
7. the delivery of a range of other B1 uses in this location would be welcome and consistent with the approach proposed in the planning permission;

8. confirmation that the site is being actively marketed, enquiries from the market and preparation of the reserved matters application is noted;
9. the site has planning permission for a B Use led scheme. Should this no longer be the preferred approach, it is expected that a revised planning application would need to be submitted for consideration. The site is in an out of town location so any uses identified would have to be appropriate in terms of national policy requirements, access and design. But it is accepted that the approach to mixed-use development should be more flexible, to better reflect the needs of the employment sector overall. As such the approach will be re-visited to ensure that an appropriate mix of uses can be accommodated within each mixed-use site across the Plan area;
10. it is accepted that the permitted Lincs Gateway scheme will create employment, and may create different types of jobs to that which are commonly found in the area, however this is also true of other sites in South Holland. While it is possible that employees may travel to work from outside the area, the intention is to provide employment uses that encourage employees to live and work in the area, thereby benefitting the local economy;

5.22 **Conclusions on Lincs Gateway** - It is considered that the Lincs Gateway is one of the most suitable Employment Sites in South East Lincolnshire, and that it should not be taken forward as a Preferred Employment Site and Allocation for mixed use development:

- the Sustainability Appraisal score the Lincs Gateway with three/13 positive (green) impacts recorded, relating to inclusive communities, education and training and employment opportunities, but a further five (blue) impacts could deliver positive impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;
- the site is within Flood Zone 3a, but flood hazard in 2115 is classified as 'danger for some', and flood depth in 2115 is classified as '0-0.25m' but a suitable flood mitigation scheme has been approved for the planning permission that is being implemented;
- the developer has acknowledged that the scheme with planning permission is no longer the preferred approach, and has requested that a significant proportion of the B Use development be relocated to Clay Lake. This indicates that B Use development would no longer form the majority component of the scheme - it is likely that B uses could be subsidiary to the other uses on site. So it is considered that the site is no longer available or deliverable wholly for B Use development and should therefore no longer be allocated as a Main Employment Area;

- planning permission exists for a mix of uses on the site, and the masterplan indicated that these would be primarily within the southern site under construction at present. The developers indicate that this approach should also apply to the northern site, therefore it is considered that the site should be identified for mixed use development in the Local Plan;

5.23 **Comments received** – The following comments were made on ***Holbeach Food Enterprise Zone***:

1. support the identification of the Holbeach Food Enterprise Zone for employment use;
2. the owners indicate that the site needs to be expanded south to incorporate additional land to accommodate road access from the A151 via a new roundabout. This roundabout is currently part of a planning application;
3. given the relationship between the housing site, the Food Enterprise Zone and the Peppermint Junction improvement scheme consideration should be given to the formulation of a specific policy, for a SUE;
4. the proposed new Food Enterprise Zone has the potential to provide a range of jobs, which are not typically found in many other parts of South East Lincolnshire.

5.24 **Responses to the above comments**:

1. support for the employment site is noted;
2. extending the site south to the proposed new roundabout would better integrate the employment site with the proposed highways improvement scheme ensuring ease of access for employees and visitors. It would generate no adverse impacts upon the landscape or other Local Plan objectives. It is therefore accepted that the site boundary should be extend south, slightly;
3. it is acknowledged that the site would have links, via the Peppermint Junction highways improvement scheme to the Hob048 housing site. However the A151 separates Hob048 housing site from the proposed Main Employment Area, and although both are reliant on improvements to the A151/A17 junction, the two sites are separate elements of the overall strategy for Holbeach, with separate delivery requirements. It is considered that the SUE should only cover the housing site;
4. it is accepted that the Food Enterprise Zone could provide for a range of jobs that might not be commonly found in other parts of the Plan area.

5.25 **Conclusions on Holbeach Food Enterprise Zone** - It is considered that Holbeach Food Enterprise Zone is one of the most suitable Employment Sites in South East Lincolnshire, and that it should be taken forward as a Preferred Employment Allocation for mixed use development:

- the Sustainability Appraisal scores the Food Enterprise Zone with three positive (green) impacts being recorded relating to inclusive communities, education and training and employment opportunities but a further five (blue) impacts could deliver positive impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;
- the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for some', and flood depth in 2115 is classified as '0.25-0.50m';
- the ELTP identifies that 'the site is in a highly accessible, prominent location, capable of accommodating a good critical mass of B-Uses. The planning permission to deliver highways improvements to the adjoining Peppermint Junction and provide a new roundabout along the A151 would be capable of accommodating the traffic from the employment site. Location in close proximity to the University of Lincoln Campus could prove attractive to related businesses in the food research sector.' So this site is considered to have the potential to attract a mix of businesses and jobs that are not commonly seen in South East Lincolnshire, which could help diversify and strengthen the economy and widen the skills base;
- the ELTP identifies that 'there will be significant upfront costs associated with this site; site access, provision of utilities infrastructure, flood mitigation, servicing and landscaping will be required. Although planning permission for the site access has been secured, planning permission for site has not. This means that the site is expected to be developed in the medium-long term'. The LPA is developing a Local Development Order for the site, so if allocated it can be assumed that viable employment development could take place in the plan period;
- no objections to the site's allocation were made.

5.26 **Comments received** – The following comments were made on **Crease Drove Business Park, Crowland**:

1. support for the proposed employment site;
2. the proposed expansion of Crease Drove Business Park north will have an adverse impact on existing and future housing schemes, and should be de-allocated.

5.27 **Responses to the above comments**:

1. support for the employment site is noted;

2. SHDC's Environmental Health identifies that 'residential development could be suitable on sites within the settlement boundary as long as prior to development, acoustic assessments are carried out to determine the potential noise impact on proposed residential properties. Any potential noise impact should be taken into account in the design and construction of properties.' A similar approach would be required from any future user of the employment site in terms of impact upon residential properties. Therefore it is not accepted that this site should be de-allocated;

5.28 **Conclusions on Crease Drove Business Park** - It is considered that Crease Drove Business Park is one of the most suitable Employment Sites in South East Lincolnshire, and that it should be taken forward as a Preferred Main Employment Site and Allocation:

- the Sustainability Appraisal scores Crease Drove Business Park with three positive (green) impacts being recorded relating to inclusive communities, education and training and employment opportunities although a further five (blue) impacts could deliver positive impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;
- the ELTP indicates that 'the site is in an accessible location and is suitable as an employment site, particularly for the current occupiers or other B-Uses'. A recent planning permission for a vacant plot indicates the ongoing suitability of the site for employment development;
- the Highways Authority identifies that 'the land to the north of the Crowland Cranes site would not be suitable without substantial improvement works to Crease Drove'. Given the size of the site it is considered that such improvements could make development of this site unviable, particularly with costs associated with flood mitigation, utilities and landscaping. It is therefore considered that this site should be discounted;
- the ELTP identifies that 'there will be minimal upfront costs associated with developing the vacant plots within the Business Park, these are available for development now.' So if allocated it can be assumed that viable employment development could take place in the short-medium term.

5.29 **Comments received** – The following comments were made on ***Kirton Distribution Park***:

1. support employment development on Kirton village outskirts.

5.30 **Responses to the above comments:**

1. support for employment development at Kirton Distribution Park (on the edge of Kirton) is noted;

5.31 **Conclusions on Kirton Distribution Park** - It is considered that Kirton Distribution Park is one of the most suitable Employment Sites in South East Lincolnshire, and that it should be taken forward as a Preferred Main Employment Site and Allocation:

- the Sustainability Appraisal scores Kirton Distribution Park with three positive (green) impacts being recorded relating to inclusive communities, education and training and employment opportunities although a further seven (blue) impacts could deliver positive impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;
- the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.5-1.0m';
- the ELTP identifies that 'the site is in an accessible, high profile location, is an established employment allocation, suitable for the current mix of uses', the frontage of the site is under construction indicating that the site is suitable for employment uses;
- the ELTP indicates that the vacant land is considered to be 'shovel ready' and that there are low costs associated with development. The land fronting the A16 is under construction, so the land to the frontage is considered to be deliverable, and able to be completed in the short term. The land to the east does not have the benefit of detailed planning permission so would be deliverable in the medium term. The southern area may require a longer lead-in to accommodate electricity cables crossing the site, so would be available medium-long term. So if allocated it can be assumed that the site could be completed in the plan period;

5.32 **Comments received** – The following comments were made on ***Wingland, Sutton Bridge:***

1. opposed to any heavy industry being sited on Wingland;
2. hydrological modelling suggests that a number of sections of Kings Lynn Internal Drainage Board's maintained watercourses in this area would be at capacity, or potentially overtopped, during extreme rainfall/flow events. Any proposed developments in this area are therefore likely to have significant constraints in terms of how they can manage their surface water run-off;

3. the request for Wingland to be re-classified as a greenfield site has been ignored. Re-classifying a small area as Countryside is mere tokenism. The area is at high risk of flooding, close to the River Nene and not suitable for industrial development. SHDC have promoted the area for 20 years to no avail. The most appropriate area for B1,B2 and B8 industry is at Little Sutton. A large employer is sited there, there is good road access, access for HGVs could easily be made available, linking with the A17 by-pass, therefore removing the need to use the old A17 through Sutton Bridge and the Pop bottle bridge at Long Sutton. The site would be easily accessible on foot or by bike from either town, in line with government policies. There is no industry planned for Long Sutton which is a main town and larger than Sutton Bridge;
4. Wingland appears to have been reduced in size however, the adopted Local Plan has a loop hole which stated 'one off 'developments would be allowed, this new plan has another loop hole allowing 'development in the countryside'. This plan offers no protection to residents quality of life;
5. Inset Map 9 does not show the site of EDF B gas fired power station, as it is in the countryside, and although it has planning approval it might not be built. Yet other proposed developments are shown on the maps. The cut off point for the maps is arbitrary as the most significant industrial development which will dominate the local landscape is omitted;
6. support the proposed Main Employment Area allocation in Sutton Bridge. It is not Grade I agricultural land and building could start immediately - the site in its entirety should be allocated as a Main Employment Area;
7. it is good to see that the area for proposed development on the Wingland site has been reduced;
8. Sutton Bridge has a high level of child poverty, the highest in South Holland - the best way to solve this is to provide jobs. Sutton Bridge has the river and the port, which opens itself to industry, and Wingland has infrastructure in place.

5.33 **Responses to the above comments:**

1. Wingland is identified as an Existing Main Employment Area capable of accommodating the full range of B uses. The Employment Land Technical Paper, 2016 states that it remains appropriate for the Proposed Main Employment Area to accommodate a similar mix of uses;
2. although drainage issues exist, it appears they are not insoluble and some employment development could take place, albeit will be critical

for any interested party to involve the IDB in discussions at an early stage in the development process;

3. the adopted Local Plan allocates 55.6ha of land for employment use at Wingland, the current proposal is for 7.6ha, it is therefore not accepted that de-allocating 48ha of land is 'tokensim'. The site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for all', and flood depth in 2115 is classified as '1-2m' however the Environment Agency have identified that 'allocations in areas of hazard would need to ensure that finished floor levels are raised to the appropriate level with additional flood resilient construction incorporated'. It is accepted that the site is within 45m of the River Nene although separated by a road. The amount of employment land proposed for South East Lincolnshire took account of many issues, including: the findings of the South East Lincolnshire Employment Land Technical Paper (January 2016); the existing and predicted population of the area; economic conditions and trends between 2001 and 2016; and the take-up of land for B Use development across South East Lincolnshire and within employment allocations. Although it is accepted that the take-up of land and market interest for the available land does not justify the allocation of all 55.6ha, it is considered that the allocation of a small amount of land is appropriate to accommodate the expansion of existing uses or for the development of small-scale enterprise. Long Sutton and Sutton Bridge are both Main Service Centres; 9.3ha of land has also been allocated at Long Sutton/Little Sutton for employment uses which is higher than that identified for Sutton Bridge to reflect the higher level of growth proposed there. The Local Plan can only allocate land that is available for employment development, the sites identified reflect the sites available in January 2016. A new road access from Bridge Road to the A17 has not been identified as a new transport route in this Local Plan;
4. the adopted Local Plan expects development at Wingland 'to be confined to Classes B1, B2 and B8 use but exceptionally other employment which does not fall within these categories may nevertheless be appropriate.' At the time Wingland was a strategic employment location, and it was considered that a site of its size could accommodate other employment generating development without prejudicing the supply of B1, B2 and B8 development land. However the site is no longer identified as a strategic employment site and the Proposed Main Employment Area will identify land for B1, B2 and B8 uses. Given the size of the land available it is considered that additional employment generating uses would prejudice the ability of the location to function as a Main Employment Site in the long term. Consistent with national policy the Local Plan should allow for development outside settlement boundaries that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable

development needs of the area in terms of economic, community and environmental benefits. But there are other Local Plan policies that strive to protect the amenity of residents in particular relating to light, noise, odour, fumes, vibration and waste materials. These matters will be addressed in more detail through the planning application process;

5. the employment allocations on the Policies Map only show land that is identified for B1, B2 and B8 development. Power stations are a sui generis development, and therefore were not classified as an employment use. However it is accepted that the approach to employment provision should be more flexible, and better reflect the needs of the employment sector overall. As such the approach will be re-visited to ensure that an appropriate mix of uses are identified in different locations across the Plan area;
6. support for Wingland employment site is noted. The amount of employment land proposed for South East Lincolnshire took account of many issues, including: the findings of the South East Lincolnshire Employment Land Technical Paper (January 2016); the existing and predicted population of the area; economic conditions and trends between 2001 and 2016; and the take-up of land for B Use development across South East Lincolnshire and within employment allocations. As such it is not accepted that the take-up of land and market interest for the available land at Wingland justifies the allocation of all 55.6ha;
7. support for the reduced site area is noted;
8. the creation of jobs and improving economic conditions is one way to reduce the impact of child poverty, although other factors will also play a part. Sutton Bridge does have many advantages to help generate an improved quality of life for its residents through existing employment land, land at Sutton Bridge Port and also at Wingland. It is accepted that highways access is in place at Wingland, although flood mitigation, drainage and utilities will need to be delivered such as electricity and broadband.

5.34 **Conclusions on Wingland, Sutton Bridge** - It is considered that Wingland, Sutton Bridge is one of the most suitable Employment Sites in South East Lincolnshire, and that it should be taken forward as a Preferred Main Employment Site and Allocation:

- the Sustainability Appraisal scores Wingland with three positive (green) impacts being recorded relating to inclusive communities, education and training and employment opportunities but a further six (blue) impacts could deliver positive impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;

- the ELTP identifies that the site is ‘an established employment allocation, in an accessible location with a good critical mass of employment uses, suitable for the current uses and occupiers or for other B-Uses.’ The known constraints relating to flood mitigation, drainage and electricity supply indicate that this location is only capable of accommodating limited development over the plan period so only development adjoining the spine road will be taken forward to help minimise start-up costs and maximise deliverability;
- the ELTP indicates that ‘if it is allocated there will be upfront costs associated with this site; provision of utilities infrastructure particularly electricity, flood mitigation, servicing and landscaping will be required.’ The land has yet to secure planning permission so it can be assumed that there will be a long lead-in time so the sites would not be developed until the medium-long term.

5.35 **Comments received** – The following comments were made on West Bank Industrial Area, Sutton Bridge:

1. the West Bank Business Area should be re-designated to allow residential development. An opportunity exists to enhance the area with good quality housing next to the marina and the golf course.

5.36 **Responses to the above comments:**

1. national policy identifies that sites allocated in a Local Plan must be suitable, available and deliverable over the plan period. The site has not been submitted for consideration as a housing site, and continues to operate as an employment site. Therefore, the site is considered to be unavailable for housing use in this plan period;

5.37 **Conclusions on West Bank Industrial Area, Sutton Bridge** - It is considered that West Bank Industrial Area, Sutton Bridge is one of the most suitable Employment Sites in South East Lincolnshire, and that it should be taken forward as a Preferred Main Employment Site:

- the site is within Flood Zone 3a, flood hazard in 2115 is classified as ‘danger for most’, and flood depth in 2115 is classified as ‘0-0.25m’;
- the ELTP identifies that ‘it is ‘an established employment site, in an accessible location providing for a good critical mass of local employment uses, suitable for the current mix of uses and occupiers of for other B-Uses’. No evidence has been provided to indicate that the site is not likely to remain in its current use over the plan period;

5.38 **Comments received** – The following comments were made on Sutton Bridge Port, Sutton Bridge:

1. Sutton Bridge Port Employment Area is not suitable for further industrial development unless a new access road is built. New Road and Petts Lane are not suitable for more heavy goods vehicles;

5.39 **Responses to the above comments:**

1. The Employment Land Technical Paper, 2016 identifies that the previous employment allocation at Sutton Bridge Port has not developed at the rate envisaged. Therefore it is considered that promoting the same amount of land in this location would not be necessary. So 2.6ha of land has been identified, instead of 10.8ha to support the unique economic function of the port. It is accepted that should the port expand significant highways improvements would be required;

5.40 **Conclusions on Sutton Bridge Port, Sutton Bridge** - It is considered that Sutton Bridge Port, Sutton Bridge is one of the most suitable Employment Sites in South East Lincolnshire, and that it should be taken forward as a Preferred Restricted Use Site and Allocation for port related uses:

- the Sustainability Appraisal scores Sutton Bridge Port with three positive (green) impacts being recorded relating to inclusive communities, education and training and employment opportunities but a further five (blue) impacts could deliver positive impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;
- the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for all', and flood depth in 2115 is classified as '1-2m';
- the ELTP identifies that it is 'an established employment site, in an accessible location, with a good critical mass of port-related employment uses, suitable for the current use and occupiers or other port-related B-Uses.' No evidence has been provided to indicate that the site is not likely to remain in its current use over the plan period;
- the ELTP indicates that 'there will be upfront costs associated with this site; site access and junction improvements, provision of utilities infrastructure, flood mitigation, servicing and landscaping will be required.' So there will be a long lead-in time should the port expand. This is expected to be in the medium to long term;
- the ELTP identifies that any allocations should reflect the 'unique long term function that exists,' so the mix of uses should be restricted to port related uses only. As such development is expected to come forward only to meet the needs of Sutton Bridge Port over the plan period;

5.41 **Comments received** - The following comments were made on ***Littleworth Drove, Deeping St Nicholas***:

1. the site is an agricultural farmstead consisting of concrete hard standings and agricultural sheds used for grain drying. It is an agricultural use and there is virtually no one employed full-time at Home Farm (Deeping St Nicholas). The identification of the site for employment use is incorrect;

5.42 **Response to the above comments**:

1. it is accepted that the exiting operation is agricultural use and not B Use development. It cannot be classified as employment generating use either. Therefore the site cannot be classified as suitable, available or deliverable for employment purposes in the Local Plan;

5.43 **Conclusions on Littleworth Drove, Deeping St Nicholas** – It is considered that Littleworth Drove, Deeping St Nicholas is not one of the most suitable Employment Sites in South East Lincolnshire, and that it should not be taken forward as a Preferred Employment Site:

- the site is not considered to be available for employment or employment generating use in the Local Plan and so should not be identified for such purposes over the plan period.

5.44 **Comments received** – The following comments were made on ***Gosberton Road, Surfleet***:

1. this site is not indicated on the Policies Map. The reference used in the Employment Land Technical Paper, 2016 (SR001) is different to that identified in the Local Plan (SHL2). The site is not listed in the South East Lincolnshire Employment Premises & Land Review 2012. A uniform system should be adopted to ensure that site references are not omitted from maps;

5.45 **Responses to the above comments**:

1. Gosberton Road, Surfleet is shown on Inset Map 25. The reference system used differs between documents and it is accepted that for clarity a common system should be used in the documents and on the Policies Map. The site was not identified in the South East Lincolnshire Employment Premises & Land Review, 2012 because that report only assessed the land availability of 29 Main Employment Areas and allocations and a sample of other sites in South East Lincolnshire – the

Employment Land Technical Paper, 2016 sought to address any gaps in evidence that existed;

5.46 **Conclusions on Gosberton Road, Surfleet** - It is considered that Gosberton Road, Surfleet is one of the most suitable Employment Sites in South East Lincolnshire, and that it should be taken forward as a Preferred Local Employment Site:

- the Sustainability Appraisal scores Gosberton Road, Surfleet with four positive (green) impacts being recorded relating to inclusive communities, education and training, flood risk and employment opportunities, but a further seven (blue) impacts could deliver positive impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;
- the site is within Flood Zone 1, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard';
- the ELTP identifies that it is an 'established local employment site with good access to the local road network, suitable for the current use and or for other small-scale B-Uses.' The site has recently changed occupiers indicating the ongoing suitability of the site for small-scale employment use in this location;
- no objections to the site's allocation were made.

5.47 **Comments received** – The following comments were made on *Princes/LC Packaging*:

1. the land behind the Princes Food Factory on Bridge Road Long Sutton could be owned or optioned by the factory. If this is the case, then it is not available for other employment purposes. The land fronting Bridge Road is reliant on the provision of a ghost island on Bridge Road. The significant cost of providing this requirement has prevented the development of this land for many years. It is time to identify a more viable area of land in Long Sutton.

5.48 **Responses to the above comments:**

1. the land to the rear of Princes is not owned by the factory. Part of this land is currently allocated for employment uses for the expansion of Princes, and as they are a major employer in the area it was considered important to ensure the appropriate expansion of that site. The Highways Authority identifies that 'the site to the west of Hundreds Lane could be satisfactorily accessed from Bridge Road. The site to the south of Princes could be developed as an extension to the existing

factory but there is a 7.5 tonne maximum weight limit on Hundreds Lane to the south of the existing access to the food processing site. If access were to be formed at the frontage to Hundreds Lane, some substantial improvement works would be required on Hundreds Lane.' So it is considered that a satisfactory access can be achieved although access to the eastern site might not be as straightforward as for the west. Additional employment land has been identified on Bridge Road, which is available for Main Employment Use rather than for the expansion of one/two businesses. However additional sites have been put forward to be considered for employment use in Long Sutton (see Section 6);

5.49 **Conclusions on Princes/LC Packaging** - It is considered that Princes/LC Packaging is one of the most suitable Employment Sites in South East Lincolnshire, and that it should be taken forward as a Preferred Specific Occupier Employment Site and Allocation:

- the Sustainability Appraisal scores Princes/LC Packaging with three positive (green) impacts being recorded relating to inclusive communities, education and training and employment opportunities but a further five (blue) impacts by securing appropriate mitigation to help meet future employees and residents' needs, such as provision of transport links and protecting amenity;
- the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.50-1.0m';
- the ELTP identifies that it is 'an established employment site and allocation, primarily by two occupiers, in an accessible location, with a good critical mass of employment units, suitable for the current uses and occupiers or other B-Uses.' A planning application has recently been submitted for intensification of the Princes site, so it can be reasonably assumed, that the site remains suitable for the current purpose;
- the Highways Authority identifies that the potential specific occupier site to the west of Hundreds Lane could be satisfactorily accessed from Bridge Road. But there is a 7.5 tonne maximum weight limit on Hundreds Lane to the south of the existing Hundreds Lane access to the Princes site. So substantial improvement works would be required on Hundreds Lane to access the potential employment site to the south of the Princes site'. It appears that access could be achieved to both sites, although it may be less straightforward to the eastern site, which may have an adverse impact upon deliverability;
- the ELTP indicates that 'if it is allocated any extension/intensification works would be met from the parent company finances as part of an agreed business plan/financial model'. However discussions with the

landowner indicate that this land could be available to the open market, so if taken forward should be identified as a Main Employment Site. Even so, development, particularly of the eastern site is likely to take place in the medium-long term to reflect the significant upfront investment required in highways and utilities improvements, flood mitigation and landscaping;

5.50 **Comments received** – The following comments were made on ***Flamingo Flowers, Weston:***

1. the current allocation only makes provision for the refurbishment, subdivision or replacement to improve existing buildings. It does not allow the extension or intensification of use and, so acts as an artificial break on the growth of business and will limit growth of employment and force successful businesses to look elsewhere if their floor space needs increase. Whilst the intention seems to be to support continued and increased employment use on these sites, the wording appears restrictive and suggests that a change of ownership would require planning permission and limit the future development potential of the site. Clearly, if the site was in D2 use and bought by another company with the intention to continue that use, this would not constitute development and planning permission would not be required. Similarly, should this new company wish to carry out works or improvement to the site which would require planning permission, these should not be prejudice on the basis that the occupier has changed since the site was designated. The wording appears restrictive in terms of the legal ownership which is not a planning matter. The use, and continued use of the site should be seen as important and reflected in the policy rather who the occupier of the site is;
2. the southern part of the Weston site is designated as a Specific Occupier Site relating to the built element of the site rather than the site as a whole. The currently undeveloped part of the site, located to the north-east of the existing development, had outline planning permission granted in 2000 and extended in 2003 to expand the existing business. This permission included substantial new buildings on the undeveloped part of the site. Although this permission has now expired, it shows that the site should be considered as a whole with the same designation so as not to harm future growth opportunities.

5.51 **Responses to the above comments:**

1. the intention of the policy is to support the continued operation and growth of local business particularly those related to the food/horticultural processing and packaging industry, which is important

to the overall economy of South East Lincolnshire. It is accepted that the wording of the policy does not reflect the intent, and requires clarification. This will be undertaken through subsequent versions of the draft Local Plan;

2. the land identified reflected the information available to inform the Employment Land Technical Paper in 2015. Since the adoption of the 2009 Local Plan national policy has changed significantly; allocated sites must be suitable, available and deliverable over the plan period. The potential employment sites reflected the availability of land in January 2016; planning permission for the adjacent site expired in 2008 indicating a lack of interest for development in this location.

5.52 **Conclusions on Flamingo Flowers, Weston** - It is considered that Flamingo Flowers, Weston is one of the most suitable Employment Sites in South East Lincolnshire, and that it should be taken forward as a Preferred Employment Site:

- the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard';
- the ELTP identifies that it is an 'established employment site, in a highly accessible location with a good critical mass of employment development, suitable for the current use and occupier or for other B-Uses.' The site has recently changed occupiers, indicating the site's ongoing suitability for employment development over the plan period;
- no objections to the site's allocation were made.

5.53 **Comments received** – Several comments were made on the ***Spalding Rail Freight Interchange***. However the detailed evidence required to demonstrate suitability, availability and deliverability of the site has not been submitted, therefore the site is no longer able to be promoted for a rail freight interchange and related employment use in this Local Plan.

6 NEW SITES

- 6.1 The following sixteen new sites were put forward for consideration as Potential Employment Sites:
1. **Flamingo Flowers, Low Fulney:** The SELAA identifies this site as being unsuitable because it is located a 1km from Spalding settlement boundary, so would conflict with the Local Plan's locational strategy;
 2. **Land to the north of Clay Lake, Spalding:** The SELAA identifies this site as being suitable because it is located adjacent to an existing Main

Employment Area and land with planning permission for B Uses. The access improvements to be delivered with the permitted land would apply to this site. However the site does not have planning permission, would need significant upfront investment to open up the wider site for development. As the take-up of employment land in South Holland is still slow, so it is considered that only the wider site would be developed over the plan period. As such this site will not be designated for employment use in this plan period;

3. **Station Road, Long Sutton:** The site wraps around an existing dwelling. The Highways Authority identifies that the frontage to the north of this dwelling is the most suitable for access, but the impact upon the amenity of this dwelling would be significant. Therefore this site is not considered to be suitable for employment use;
4. **Land to the south of Chalk Lane, Sutton Bridge:** The SELAA identifies this site as being unsuitable because of concerns relating to deliverability; the King's Lynn IDB have identified drainage concerns, which together with flood mitigation and provision of utilities infrastructure could make a scheme unviable;
5. **Land to the west of LC Packaging, Long Sutton:** The SELAA identifies this site as being suitable for employment development; the Highways Authority identifies that 'there is an existing Bus Stop at this site's western frontage to Bridge Road – but it is not impossible to re-site this if necessary. The site's eastern frontage looks to be wide enough to accommodate a suitable access and there is suitable visibility in both directions. Bridge Road is the old A17 so is of a suitable standard to be able to accommodate the vehicular activity associated with a B1 B2 and B8 use on this site,' the site is adjacent to existing employment uses so would consistent with the character of the area;
6. **Land to the south of LC Packaging and Land to the south of Princes, Little Sutton:** The SELAA identifies that the market demand for employment land does not justify the allocation of all 28.7ha, which would account for 35% of South East Lincolnshire's employment land requirement. The Highways Authority identifies that accessing the site from the A17 would require 'expensive highway works to provide a new roundabout on the A17 and a lengthy new link road capable of accommodating commercial vehicles. The cost of those works would have to come from the development.' It appears that a suitable access could be achieved, although this might not be as straightforward as for other sites and may also impact upon the deliverability of the site. Without evidence to demonstrate deliverability, it is considered that there are other more suitable sites available in the Long Sutton area;
7. **Land to the south of the A17, Long Sutton:** The SELAA identifies this site as being unsuitable because it is located a 1.2km from Long Sutton

settlement boundary, so would conflict with the Local Plan's locational strategy;

8. **Land to the east of Hundreds Lane (south of the A17), Long Sutton:** The SELAA identifies this site as being unsuitable because it is located a 1.7km from Long Sutton settlement boundary, so would conflict with the Local Plan's locational strategy;
9. **Land to the north of the A17, Sutton Bridge:** The SELAA identifies this site as being unsuitable because it is detached from Sutton Bridge settlement boundary, so would conflict with the Local Plan's locational strategy and would provide an incongruous form of development in the countryside;
10. **Land to the east of Falklands Road, Sutton Bridge:** The SELAA identifies this site as being unsuitable for employment development as it is the preferred site for housing in Sutton Bridge;
11. **Land to the north of Kestrel Close, Sutton Bridge:** The Highways Authority identifies that 'it does not appear that an acceptable vehicular access is available since it is accessed by a track that runs between new dwellings and crosses an access road to Kestrel Close' so it appears that a satisfactory access cannot be achieved. The site would also extend Sutton Bridge north forming a significant and incongruous form of development in the countryside. As such the site is unsuitable for employment development;
12. **Land to the north of Sutton Bridge:** The SELAA identifies this site as being unsuitable because it is detached from Sutton Bridge settlement boundary, so would conflict with the Local Plan's locational strategy;
13. **Land to the south of Westmere Farm, Sutton Bridge:** The SELAA identifies this site as being unsuitable because it is located a 650m from Sutton Bridge settlement boundary, so would conflict with the Local Plan's locational strategy;
14. **Wyberton Chain Bridge Depot, Boston:** The site is an existing depot and employment use. However the site is a small-scale (0.75ha) and is not a strategic site so is not required to contribute to the area's employment land provision. It is considered that the Local Plan will provide adequate provision for the site's ongoing operation or potential re-use.

7. PREFERRED OPTIONS EMPLOYMENT ALLOCATIONS

7.1 The following sites are taken forward as Preferred Options Proposed Main Employment Area Allocations:

- Endeavour Park, Boston;
- Riverside Industrial Estate, Boston;
- Wardentree Lane, Spalding;

- Clay Lake, Spalding;
- Crease Drove Business Park, Crowland;
- Thorney Road, Crowland;
- Bridge Road Industrial Estate, Long Sutton;
- Bridge Road, Long Sutton;
- Enterprise Park, Sutterton;
- Wingland, Sutton Bridge;
- Enterprise Park, Freiston;

7.2 The following sites are taken forward as Preferred Options Proposed Local Employment Site Allocations:

- Love Lane, Sutterton;
- Railway Lane Industrial Estate, Sutton Bridge;

7.3 The following sites are taken forward as Preferred Options Proposed Mixed Use Development Site Allocations (where employment generating uses will complement the B Use provision, or in the case of Q2: The Quadrant, residential development):

- Q2: The Quadrant, Boston;
- Lincs Gateway, Spalding;
- Food Enterprise Zone, Holbeach;
- Kirton Distribution Park, Kirton;

7.2 These allocations provide 85ha of land for B Use development. [The capacity of the sites assumes that a greenfield site will discount 20% of the available land for access, sustainable drainage, landscaping etc., while a brownfield site will discount 10% of the available land for mitigation as infrastructure may already be in place.] A range of other opportunities for employment will be identified at the Specific Occupier Sites, the ports and power stations, and other sites throughout the area.

7.3 All Preferred Employment Sites are identified on the Policies Maps that accompany the Housing Papers. These are available at www.southeastlincslocalplan.org