

Matter 4 – the Council’s Response to the Inspector’s Questions

Delivering Economic Prosperity – Chapter E

Is the approach of the Plan to employment matters justified, consistent with national policy and capable of effective implementation?

1. Is adequate regard had to biodiversity?

- 1.1. As discussed through other responses to questions within the Matter statements, the need to have adequate regard to biodiversity is important. Where a masterplan is required to bring a site forward, for example in the case of the Major Sites such as Cuerden and Samesbury, then it is considered that there are adequate processes in place. Additionally, the Central Lancashire Core Strategy (SRE002), as part of South Ribble’s Development Plan also contains specific policies aimed at considering biodiversity through the planning process. Policy 18: Green Infrastructure and Policy 22: Biodiversity and Geodiversity are of notable importance here.
- 1.2. However, given the requirements of the National Planning Policy Framework (NPPF) (CD 4.7) and considered representations from organisations and individuals including Lancashire County Council and Lancashire Wildlife Trust, it is considered the most appropriate action would be to include a biodiversity specific policy within the Plan. This would enable the Council to comprehensively address issues such as ecological networks and also to provide a policy framework through which to give adequate regard to biodiversity when dealing with planning applications, including information on appropriate mitigation and avoidance.

2. Are the allocated sites, on the available evidence, appropriate, justified and deliverable having regard to the alternatives?

Introduction

- 2.1. The Council considers that the allocated employment sites including the major development sites are indeed appropriate, justified and deliverable. The Council has carefully considered the alternatives. All allocations and alternatives have been subject to a sustainability appraisal, various consultation stages and general assessment to

understand the site's deliverability and appropriateness to justify its allocation.

- 2.2. This statement sets out the background evidence and justification for the allocated employment sites contained within the Submission Version of the South Ribble Site Allocations Development Plan Document (DPD). This statement also explains the assessment methodology used by the Council to evaluate the sites which were put forward and considered as potential employment allocations.
- 2.3. The assessment overall determined the most appropriate locations for employment land. The Council considers that the site selection process was carried out in a fair and transparent way at all stages of the consultation process – this is detailed below.
- 2.4. Details for the decisions are contained within the site portfolios appended to Matter 3. The site portfolios have been produced to offer background information on each of the sites allocated by the Council and the reasons for these allocations. Portfolios for the alternatives have also been produced.
- 2.5. The Site Allocations DPD process provided the opportunity to review land allocations and consider the relative need for different land uses. The Council has given priority to the most deliverable and developable previously developed land wherever possible. There has also been a need to consider greenfield sites within the built up area in order to help deliver employment land and economic development objectives of the Core Strategy and Site Allocations DPD. One of the larger strategic sites, BAE Samlesbury which is also classified as an Enterprise Zone is situated in the green belt. This mix of land types is considered a sustainable approach that reflects the broad aims and purposes of the NPPF and should ensure the efficient deliverability of employment land and economic growth throughout the plan period.
- 2.6. The location of proposed sites has been influenced by locational policies in the Core Strategy, primarily Policy 1 – Locating Growth. This directs development to the Core central areas of the borough. Developments within the central urban area of the Borough have obvious advantages such as good transport links, a mix of facilities and a good range of services. Locating development here will help minimise the need to travel and maximise the use of public transport, cycling and walking - this will also assist delivery and contribute to the Council's plans to ensure the Borough's future vitality, viability and economic growth.
- 2.7. The deliverability of sites has been fully considered; some sites have come forward through the Employment Land Review (CD4.11) Process and others have been submitted as a result of the call for

sites process whereby landowners and developers put forward their sites for housing development.

- 2.8. The Council has considered viability and supporting infrastructure in its broadest sense for each of the sites. In the assessment of sites we have used the evidence collected in the sustainability appraisal proforma process, discussion and on-going dialogue with landowners and developers and the viability work carried out to inform the Community Infrastructure Levy (CD5.5.1).
- 2.9. It is considered there are no obvious viability challenges or identified abnormal costs relating to the allocated sites which would affect overall deliverability within the plan period. It is recognised by both the Council and developers that the developers will need to contribute to the delivery of essential infrastructure (notably highways improvements as addressed in the Central Lancashire draft transport Masterplan.) This will be secured through the use of Section 106 agreements until the Community Infrastructure Levy (CIL) is adopted. The CIL is at an advanced stage and was submitted to the Secretary of State in February 2013. Core Strategy Policy 2 and Site Allocations Policy A1 will also help to secure the necessary infrastructure linked to particular developments.
- 2.10. The allocations are also based upon local knowledge of the existing use of sites, infrastructure requirements and developer intentions through the on-going dialogue with landowners, developers and related businesses. Whilst some of the smaller sites are expected to come forward in the short term, in the longer term, the large strategic sites will come forward later ensuring we have a steady supply of varying employment opportunities throughout the plan period.
- 2.11. The scale of sites proposed varies from small / medium sized urban sites to the two large strategic sites. Collectively, they will provide sufficient capacity to help meet local, regional and national employment needs. The inclusion of the strategic sites in line with Core Strategy policy 1 provides the opportunity to deliver new infrastructure particular Highways infrastructure which will help build sustainable communities and integrate existing ones.
- 2.12. It is also important to note that the Council have been in communication with developers and landowners on the employment sites particularly the strategic sites of Cuerden and BAE Samlesbury, which reflects their keen interest and the sites value in terms of deliverability. Planning applications may not have been submitted yet however on-going discussions and draft proposals are currently being drawn up. (The strategic employment sites are dealt with in the Matter 2).

- 2.13. Availability of the sites has also been checked at various stages in the plan preparation process - in many cases dialogue with landowners and developers has been carried out frequently to help understand the most up to position. (Support for the two strategic sites is detailed in Matter 2).

The Methodology – Assessment Process and Consultation

- 2.14. The process of evidence gathering and identifying potential sites began in 2005, with a 'call for sites' exercise, where the Council invited people to suggest places that could be used for new housing, employment, retail, community or leisure uses, as well as land that should be protected from development in some way. A further 'call for sites' was held in 2007. From these, the Council received over 200 site suggestions for a variety of development types or protection including housing.
- 2.15. In December 2010, the Council began an eight week public consultation exercise on the Issues and Options Discussion Paper. This paper contained all of the sites that had been suggested to the Council, highlighted local issues, and proposed development management policies. It also contained a number of questions relevant to each chapter.
- 2.16. Responses received during the consultation were carefully considered, and each site was then subject to a detailed Sustainability Appraisal (SRSD005) to ensure that decisions on all available options were made in accordance with the principles of sustainable development and the sustainability objectives included within the sustainability appraisal framework. This framework is the same as the one used for the Core Strategy to ensure this document is in conformity.
- 2.17. The Council then carried out the consultation on the Preferred Options stage development plan document (SRE054a), from November 2011 – January 2012. This contained a preferred list of sites that the Council proposed to allocate. The consultation responses at that stage were then considered to help formulate the Publication Version of the document, which was then submitted in October 2012.

Assessing the Potential Sites - The Filtering Exercise

- 2.18. As the purpose of the Site Allocations DPD is to determine specific sites for development, before carrying out any detailed Sustainability Appraisal of each site suggestion received, a filtering exercise was undertaken to eliminate sites suggested for housing or employment that were not in accordance with the Core Strategy. This exercise is set out below and was carried out at the earliest stage of the process i.e. before the issues and options consultation. Sites that were not in

accordance with the following steps below were filtered out and shown as a green colour on the issues and options maps.

Step 1

- 2.19. Eliminate sites that are not within the following locations and therefore not in accordance with the Core Strategy Publication version Policy 1: Locating Growth:
- The Preston/South Ribble urban area (including Penwortham, Lostock Hall, Bamber Bridge, Walton-le-Dale and Higher Walton)
 - The Key Service Centres of Leyland and Farington,
 - The Rural Local Service Centres of Longton.

Step 2

- 2.20. Eliminate sites in the Green Belt or Open Countryside that are not adjacent to the boundaries of those settlements listed in Step 1. (It is important to note that an exception to this is the strategic site at BAE Samlesbury, where there is a need to release green belt due to the site being classified as an Enterprise Zone. To allow the EZ to be delivered within the plan period the sites boundary will need to be amended to allow expansion.)

Step 3

- 2.21. Eliminate any of the remaining sites that are in Flood Zone 3. These will only be assessed if insufficient land for housing and employment is available within Flood Zones 1 and 2.

Next Stage

- 2.22. Once this process was carried out a pool of remaining potential sites were indicated meaning that a preferred list of sites could be established using a combination of desk based research, dialogue with landowners and developers, site visits and consultation feedback.
- 2.23. Work on the sites also included using the Council's mapping information held on its Geographical Information System (GIS), to develop an overall picture of each site, its key characteristics and surrounding areas to help provide an initial assessment of site suitability. (Site maps and photographs are included within the site portfolios.)
- 2.24. Planning history and existing local knowledge has also been used to support decisions on individual sites., Some of this has been submitted in the form of evidence documents as part of this examination process; this includes the Central Lancashire Core Strategy, the Site Allocations DPD Sustainability Appraisal, the draft Central Lancashire Community Infrastructure Levy and associated

documents, the Employment Land Review, Water Cycle Study, Strategic Flood Risk Assessment and previous planning applications.

- 2.25. The sites were then subject to a Sustainability Appraisal under the requirements of section 19(5) of the Planning and Compulsory Purchase Act 2004. The Sustainability Appraisal also incorporates the requirements of Strategic Environmental Assessment (SEA) in accordance with European Union Directive 2001/42/EC.
- 2.26. The Sustainability Appraisal Framework used consists of objectives, targets and indicators to provide a means by which the sustainability of the plan could be tested. The SA Framework for assessing the Site Allocations DPD is based on the same SA Framework used for assessing the Core Strategy to ensure the two documents are aligned.
- 2.27. The tables included within the appendix to Matter 3 set out the SA Framework that formed the basis for the appraisal of each of the sites. Table one details the objectives and questions asked about each site and Table two is the SA measurement proforma. This process provided a means for the Council to test the sustainability, deliverability and viability of each site against each objective.
- 2.28. A full Sustainability Appraisal Report has been produced detailing the results of each of the site and policy appraisals and the document was submitted in support of the Site Allocations DPD. The results of the appraisal on each site is set out in the Sustainability Appraisal Report - this document gives reasons for the decision to include a site or not. This information is also included in the site portfolios.

The Allocated Sites and Alternatives

- 2.29. In terms of alternative employment sites put forward for consideration, there are only a small number that have not been taken forward. There are various reasons, including policy requirements in the Core Strategy and outcomes of the preferred options consultation.
- 2.30. Central Lancashire Core Strategy Policy 9 – Economic Growth and Employment, sets out a requirement of 44.5 hectares of employment land for South Ribble over the plan period. It states an allowance for losses of 17.5 hectares and an additional provision to 2026 of 27 hectares. The Inspectors report that was prepared for the Core Strategy also highlighted the importance of the 35 hectares allowance for losses.
- 2.31. The two strategic employment sites - Cuerden and BAE Samlesbury (Enterprise Zone) takes the boroughs total requirement of additional employment land over the figure (44.5ha). It is recognised that

Cuerden and BAE Samlesbury are sites that are capable of stimulating economic growth, inward investment and high quality jobs for South Ribble, Central Lancashire and on a national scale, further to this BAE Samlesbury will attract investment on an international scale due to its specialised activities.

- 2.32. The two sites total 118 hectares of employment land over the plan period. However even in light of this oversupply, it is still important that the Council provides opportunities for smaller local business to establish, as well as giving the opportunity for existing businesses to expand on to sites that are allocated within the borough. The Council has a duty to ensure that there is the right type and number of jobs, that people have the skills to fulfil those jobs and importantly there are the opportunities to facilitate this by ensuring the appropriate amount of land for different types of employment uses is made available.
- 2.33. Through the process of producing the Site Allocations Document a key issue to address was the Enterprise Zone status which was achieved at the BAE Samlesbury strategic site in autumn 2011. This meant that further land was to be released to allow this site to expand in line with its Enterprise Zone status.
- 2.34. At the Preferred Options stage consultation of the Site Allocations DPD there were also various issues raised with regard to the amount of employment land proposed in the document. These included objections from The South Leyland Residents Action Group who objected to the proposed employment land allocated off Emnie Lane/ Leyland Lane (Site b). Concerns included noise pollution, safety issues, congestion and loss of the openness of the area, its relation to the proposed residential site (site P) which sits adjacent to the site and the sufficient supply of employment land located nearby.
- 2.35. Other comments at the Preferred Options stage were from local residents in Bamber Bridge objecting to the proposed employment allocation at Kellet Lane (shown as Site c on the Preferred Options proposal map), their reasons were due to the open space that is currently on that site and the houses that look on to this area, they also stated that there was sufficient employment land nearby.
- 2.36. On the basis of these key issues and the comments raised at the Preferred Options stage it was considered appropriate to revisit the employment element of the document including policy and the employment allocations as proposed in the Preferred Options document, and consequently changes were made at Publication stage. It is worth noting that the proposed changes that were made in Policy E1 – Allocation of Employment Land, from the Preferred Options stage to Publication stage document included the removal of South Rings which is now accounted for as a commercial

development, Kellet Lane which was put into existing built up area and Emnie Lane which is now safeguarded for future development, this reduced the overall allocation of local employment land from 67.3 hectares to 35.4 hectares.

- 2.37. As stated above the Central Lancashire Core Strategy sets out a requirement of 44.5 hectares of employment land for South Ribble over the plan period, however due to the location of 2 strategic employment sites within the borough this requirement is superseded.
- 2.38. On this basis the Council concluded that a pragmatic way forward would be that the requirement (44.5 hectares) was to be made up of 35.4 hectares of land (as set out in the table within Policy E1 in the Site Allocations DPD) to provide for local employment needs and an element/portion of the 2 strategic sites (Cuerden and BAE Samlesbury) would make up the additional hectares. This then gives a wide range of employment opportunities from high tech jobs to low skilled jobs throughout the borough.
- 2.39. As the Council are proposing to use 9.1 hectares of the strategic sites allocations, there is then a remaining 108.9 hectares of this allocation. This would contribute towards the employment land supply for Central Lancashire as a whole and the North West Region. Importantly it was the Government's intention that the Enterprise Zone would also contribute nationally and internationally to employment needs and demands, meaning that sub regionally, regionally, nationally and even internationally there are the opportunities for people to work at these 2 strategic sites.
- 2.40. The Council has addressed the issues that were raised during consultation processes, the further allocation at BAE Samlesbury due to the Enterprise Zone and the location of the Cuerden site within the Borough. The Council believe that even with the oversupply of employment land, the method used to allocate employment land within the DPD takes a pragmatic view to having 2 strategic employment sites located within the borough, whilst ensuring appropriate local job opportunities are made available. In conclusion the employment sites including the major development sites within the Site Allocation DPD are appropriate, justified and deliverable and the Council has taken consideration of the alternatives. The appropriate methodology and assessment to arrive at these decisions has been carried out.

3. Is the protection of employment sites consistent with the NPPF?

- 3.1. The Council has a duty to ensure that there is the right type and number of jobs, that people have the skills to fulfil those jobs and importantly there are the opportunities to facilitate this by ensuring the appropriate amount of land for different types of employment uses is made available within varying locations in the borough through allocated appropriate land. Protecting jobs that are already in the borough is a priority for the Council, and protecting employment sites is one method of delivering this objective. The NPPF (CD4.7) states that local planning authorities should support economic growth through the planning system, as the planning system should do “everything it can to support sustainable economic growth”. Allocating 62 additional hectares of additional employment land, because of the regional and national importance of the strategic employment sites at Cuerden and Samlesbury, will help the borough and region to significantly contribute to economic growth. Even with the oversupply of employment land, the method used to allocate employment land within the DPD takes a pragmatic view to having two strategic employment sites located within the borough, whilst ensuring appropriate local job opportunities are made available. The Central Lancashire Controlling the Re-Use of Employment Premises SPD (SRE004b) protects employment land supplies to support economic growth in Central Lancashire, which is consistent with the NPPF’s objective to support economic growth through the planning system.
- 3.2. Nevertheless, the NPPF does say that planning policies should “avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.” The Central Lancashire Core Strategy and the Central Lancashire Controlling the Re-Use of Employment Premises SPD supports this, as land allocations will be reviewed. Applications for alternative uses of land will be treated on their merits and have regard to market signals. Policy 10 of the Central Lancashire Core Strategy states that proposals for housing on employment sites will be considered if specific criteria are met and the site has been subject to a 12-month marketing period for employment re-use:
- 3.3. “All existing employment premises and sites last used for employment will be protected for employment use. There will be a presumption that ‘Best Urban’ and ‘Good Urban’ sites will be retained for B use class employment use. Proposals on all employment sites/premises for re-use or redevelopment other than B use class employment uses will be assessed under the following criteria:

- there would not be an unacceptable reduction on the type, quality or quantity of employment land supply;
 - the provision and need for the proposed use;
 - the relative suitability of the site for employment and for the alternative use;
 - the location of the site and its relationship to other uses;
 - whether the ability to accommodate smaller scale requirements would be compromised;
 - there would be a net improvement in amenity.
- 3.4. Any proposals for housing use on all employment sites/premises will need to accommodate criteria (a)-(f) above and also be subject to:
- convincing evidence of lack of demand through a rigorous and active 12 month marketing period for employment re-use and employment redevelopment;
 - an assessment of the viability of employment development including employment re-use and employment redevelopment.”
- 3.5. The employment sites allocated in the South Ribble Local Plan 2000 were successful in creating a focus for employment, and the major sites for employment identified in this Site Allocations and Development Policies DPD will continue this. However, in line with the NPPF, there is flexibility in the allocation of employment sites, as outlined in Policy 10 of the Central Lancashire Core Strategy. The monitoring framework and Policy 10 of the Central Lancashire Core Strategy provide a contingency plan, which complies with the NPPF’s requirement to treat applications for alternative uses on their merits.
- 3.6. In sum, the protection of employment sites is in accordance with the NPPF as its intention is to contribute to sustainable economic growth. The NPPF does require flexibility for these sites, which policy 10 of the Central Lancashire Core Strategy, supported by the Central Lancashire Controlling the Re-Use of Employment Premises SPD, does offer consistency with the NPPF.

4. Are the boundaries of the retail areas justified, having regard to the available evidence?

- 4.1. GVA Grimley was hired in 2010 to conduct a Retail Study (SRE17a-f) on Central Lancashire by South Ribble Council, Chorley Borough Council and Preston City Council with the remit to offer recommendations to enable the Joint Authorities to proactively plan for future development. GVA Grimley’s analysis included a retail hierarchy

for Central Lancashire. The retail hierarchy is split in to three categories for South Ribble:

- Main Town Centres (Leyland)
- District Centres (Bamber Bridge, Longton, Penwortham, and Tardy Gate)
- Local Centres (Earnshaw Bridge; Farington; Gregson Lane; Higher Walton; Kingsfold; New Longton; Seven Stars; Walmer Bridge; and Walton-le-Dale)

- 4.2. The classifications and boundaries are defined by their market share and having regard to emerging provision. Leyland town centre is the principal centre for the South Ribble district. However it has a limited retail offer, especially compared to Preston. Bamber Bridge, Longton and Penwortham were already classified as district centres and the research supported the idea that they offer a localised supportive role in the retail hierarchy. The local centres typically include a small range of shops (small supermarket) and basic facilities (post-office, newsagent etc.) serving a small localised catchment. All of the local centres listed above align with this definition.
- 4.3. The main findings from the research were that major retail and leisure development is focused in Preston City Centre and Chorley and Leyland town centres. Retail and leisure developments of an appropriate scale in district centres will also be promoted in order to adequately meet local shopping needs. The smaller local centres will primarily meet local residents daily convenience (top-up) shopping and service (banks etc.) needs.
- 4.4. The Council has no evidence to counter the findings and recommendations made by the independent research conducted by GVA Grimley. The Council's most recent Retail Survey supports GVA Grimley's findings for district and local centres in South Ribble. The only exception to this is the classification of Tardy Gate as a local centre. The Council argues that is more of a district centre for the following reasons. Firstly, its retail offer is slightly larger and it has a more broad mix compared to other local centres in South Ribble. Secondly, Tardy Gate acts as a destination for its catchment area. Thirdly, it was designated in the South Ribble Local Plan 2000 as a district centre. Finally, in the future Tardy Gate will have a bigger role to play due to upcoming developments, including the Pickering's Farm site.
- 4.5. Peacock & Smith made a representation on behalf of Morrison's recommending that Leyland's town centre boundary should be extended to include the existing Morrison's store. Leyland's linear town centre is focused along Hough Lane and Towngate, and the Leyland

Town Centre Masterplan 2007 identified that the retail circuit is elongated. Morrison's is an edge-of-centre retail store and Churchill Way acts as a physical barrier for the elongated town centre. GVA Grimley's 2010 recommendations supported the Leyland Town Centre Masterplan 2007's findings; therefore, there is no evidence to suggest that the boundary should be amended.

- 4.6. It is the Council's view that, having regard to available evidence, the retail boundaries are justified and no amendments are required.