

Representation on behalf of Snetterton Heath Limited

Examination of Breckland District Local Plan 2011-2036

In respect of Matters 9, 10 and 11 – Economic Development

*Representation relating to Snetterton Park
27 hectares – previously developed land*



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Context

- Matter 9** **Economic Development**
(Policies EC 01, EC 02, EC 03, EC 04, EC 06, EC 07
and EC 08)
- Matter 10** **Economic development site allocations,
deliverability and viability**
- Matter 11** **Town Centre and Retail Strategy (Policy EC 05)**

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February 2016
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Context

This submission is supplemental to the following representations on the Breckland Local Plan:

- February 2016 - Preferred Directions Consultation Document (January 2016-February 2016) Land at Snetterton Park – representation submitted by Brian Hill on behalf of Kilderstone Ltd.
- October 2016 - Emerging Local Plan, Preferred Sites and Settlement Boundaries, 2016 Consultation – representation submitted by Keymer Cavendish Ltd. on behalf of Snetterton Heath Ltd.
- September 2017 – Local Plan Pre-submission Publication – representation submitted by Keymer Cavendish Ltd. on behalf of Snetterton Heath Ltd.

Whilst we and numerous recently published employment-focused reports support commercial development at Snetterton Heath, landowners Snetterton Park Limited, who own 28 hectares in the southwest of the general employment area, feel that Policy EC02 is unsound because:

- it has not been positively prepared
- many of the other restrictions are not justified
- and it is inconsistent with national policy

Matter 9 – Economic Development

(Policies EC 01, EC 02, EC 03, EC 04, EC 06, EC 07 and EC 08)

9.1 Is the need for additional employment land set out in Policy EC 01 justified and are the figures based on robust evidence? Is the Employment Growth Study (2013) up-of-date?

The need is most certainly justified and is the correct policy in giving every opportunity to Breckland District to thrive. See <http://www.techcorridor.co.uk/news/>

Attached at Appendix 6 is a chart formulated from the Breckland AMR 2017 <https://www.breckland.gov.uk/article/7310/Annual-Monitoring-Report> (extract at Appendix 5) showing general employment floor space which has been created over the five years 2012 to 2017. It can be seen that there has not been a smooth production of space. These matters are always cyclical, and a year such as 2014/15 can be ignored as it is almost three times the average yearly requirement of 13,437 square metres per year.

Building in some element of growth and for ease of mathematics, the 25 years of the Plan period would require 15,000 square metres a year, or for the 20 years remaining, 2016 to 2036, approximately $15,000 \times 20 = 300,000$ square metres.

**9.2 The Employment Growth Study (2013) only considers the period up to 2031.
How has the Council considered need up to 2036?**

Looking almost 15 years ahead, it is impractical for the LPA to have predicted employment demand in the period 2031 to 2036 other than by extrapolating previous figures.

9.3 The Employment Growth Study (2013) when considering different growth scenarios includes a labour supply scenario, based on a housing need estimate of 699 dpa, which is higher than that identified OAN in the Plan at 612 dpa. What is the justification for this? Does this have implications on the calculation of need?

The discrepancy between 699 dpa and 612 dpa is as a result of the initial figure being assessed on the Objectively Assessed Need (OAN) and the second figure taken from the Government prescribed figure published in 2017. However, the Government publication fails to take account of the affordability advantages of Breckland. A very interesting BBC webpage entitled 'Where can I afford to live?' <http://www.bbc.co.uk/news/business-23234033> showed that those with modest income and modest deposits could effectively live as close to London as either the Isle of Wight or Breckland (see Appendix VIII).

9.4 How has an additional need figure of 64 hectares of employment land, as set out within Policy EC 01, been arrived at?

The chart and the extrapolations from it included in section 9.1 justify how 64 hectares of employment land may have been arrived at, though our submission is that this is too low.

9.5 How many jobs is 64 hectares of additional employment land likely to generate? Does this correlate with the anticipated job growth set out in the SHMA?

Job creation from 64 hectares of employment land: it is almost impossible to predict the proportion of B1, B2 and B8 floor space that will be created*, and obviously B1 has a much higher job creation rate than other uses. Nonetheless, it should be remembered that whilst staff employed at warehouses may be limited, there are also numerous vehicle drivers delivering to and collecting from the warehouses, so there is further job creation in this respect.

***Official employment generation from B1, B2, B8 per 1,000 square metres**

B1	B2	B8
95	23	15

East Anglia is almost considered the empty quarter closest to London, with space for new families, jobs and traffic. Indeed, Snetterton is well connected: Cambridge 40 minutes, Stansted 60 minutes, London City airport 90 minutes. This compares, for example, with say Bristol, which is a two-hour drive even from Heathrow.

It is surprising that Table 6.2 of the Nathaniel Lichfield Partnership (NLP) report for Broadland District Council shows 16% increase in B8 jobs but only 8% increase overall. Snetterton is not Northampton and is not a B8 hub of England. All one needs is for an automotive 'giant' to relocate to Snetterton and numbers in B2 will change dramatically.

Note Prodrive premises on M40 Northampton (see photograph on front cover); these are the type of companies we would like to attract, but we have to respond to the market.

However, paragraph 6.23 of the NLP report suggests extrapolating past delivery would produce demand for 240,600 m² of employment space by 2031. This figure is higher than my estimate of 3000,000 m² by 2036, as recommended in Issue 9.1

These higher figures may indeed be correct as even in 2013 the NLP report was recording a shortage of vacant space – paragraph 8.9. In paragraph 8.10 of the NLP study, like myself, it states a requirement of 310,180 m² but on 75 hectares not 100 hectares. Site coverage is the difference.

9.6 Is the overall distribution and quantum set out in Policy EC 01 for each settlement justified?

It is appropriate that the quantum of development in each settlement as set out in policy EC 01 is preceded by the words: 'at least' so these are not a cap in development limits nor should they be. Breckland should encourage all possible employment growth.

9.7 To be effective should Policy EC 01 include safeguarding measures to control the loss of employment land?

Frequently historic employment sites are badly located in terms of vehicular access and in terms of environmental impact on surrounding residential areas. The idea of permitting residential development on employment sites of this nature should therefore be permitted.

9.8 Is the approach to Snetterton Heath in Policy EC 02 justified and effective?

Site coverage

An aerial view of the site is attached at Appendix IX.

Typically, one works at approximately 35% site coverage. Units with outside storage or with extensive car parking cover a lower percentage of the site, whereas an enormous warehouse with tight loading bays achieves a higher site coverage. Working on 35% site coverage, Breckland would require around 100 hectares of employment land.

It is in this context that the owners of Snetterton Park remain totally perplexed that only part of their site, albeit developed, is included within the general employment area (GEA).

This omission is doubly puzzling when the busiest area of Snetterton Park is immediately south of the main access roundabout, where in July 2016 Breckland accepted the existing use of the site as retail (site LP [087]011). We can only produce a photograph of this map (Appendix I).

Similarly much of the remainder of the Snetterton Park site annotated as Zone 1 on the July 2016 plan is also excluded from the GEA, even though it has a long-established retail use

and the benefit of planning permission 3PL/2009/1204/F among others. For instance, permission reference 3BR/2012/0078/FP is implemented and allows a larger building on the A11 frontage. Retail use confirmed in NLP report paragraph 5.19: *"The airfield also features Snetterton Park, a major visitor attraction, which accommodates a very large Sunday market AND now includes Model and Toy Expo."* (see Appendix XII).

Snetterton Park continues to receive enquiries from potential developers and employers about the land sandwiched between the GEA and the A11, but planning uncertainty is discouraging many interested parties from pursuing discussions further.

With our estimate of employment land being in the order of 100 hectares, the GEA should be expanded across the full Snetterton Park site up to the A11 and there should be no deletions of other allocated sites around Snetterton Park (Appendices I and II). But there is a logic to developing brownfield land first. As both Bruton Knowles and Nathaniel Lichfield Partnership recognise, Snetterton Park is a growth hub and development there should be maximised

However, the opening sentence of policy EC 02 appears to apply all the criteria of EC 03 to the GEA, which is unnecessarily restrictive. In particular, it is not commercially realistic to state that within the southern extent of the GEA proposals for employment within B1 and B2 are preferred when a major B8 proposal may favour that part of Snetterton Park outside the GEA on account of its sheer size. Similarly, to state that proposals should be associated with motorsport or advanced automotive engineering is also restrictive when an operation such as the construction of prefabricated housing might be preferred (see Appendix XIV).

<https://www.theguardian.com/business/2017/dec/31/uk-housebuilders-factories-prefabricating-homes>)

9.9 Where is area LP [087]010 identified on the proposals map? Which area of land does Policy EC 02 relate?

It appears that area LP [087]010 A is in fact a typographical error and should exclude the 'A'.

As mentioned above, it is confusing whether policy EC 02 relates to new allocations when it states that the criteria of policy EC 03 should apply to it, so it appears to confuse the distinction between existing and proposed development.

9.10 Is the approach of Policy EC 03 to safeguarding General Employment Areas (as shown on the proposals map) justified and effective? Could it lead to sites that are no longer suitable for employment uses lying derelict for long periods of time?

The approach in policy EC 03 is indeed unnecessarily restrictive. Snetterton Park offers one of the largest possible development sites in the Cambridge-Norwich Technology Corridor, and whilst a motor manufacturer or a racing team might be a popular occupier, that is unnecessarily restrictive, seeming almost to target too tight a 'niche'. However, with the all-electric Formula E series now expanding fast, that aspiration might mature.

9.11 Is the approach to mixed-use development in Policy EC 03 justified and effective?

As previously stated, the restrictive uses proposed by policy EC 03 are unjustified and could render the Plan commercially restrictive and unsound.

9.12 Is the approach to employment development outside General Employment Areas in Policy EC 04 justified and effective?

As already mentioned, a large part of Snetterton Park is outside the GEA, whereas on the July 2016 plan appended to this report it was shown as retail land, as indeed it was a major tourist magnet far more innovative than Toys R' Us (see Appendices III and IV).

9.13 Is the approach to farm diversification in Policy EC 06 justified and effective?
No comment.

9.14 Is the approach to tourism related development in Policy EC 07 justified and effective?

For years Snetterton Racetrack and Snetterton Park have been, and remain, a significant tourist magnet. It is neither appropriate nor possible that such facilities should be 'located within or be accessible to' the five market towns (Appendix X). The one thing you do not want is Snetterton racetrack any closer to Attleborough or other major centres of population.

9.15 Is the approach to advertising and signs in Policy EC 08 justified and effective?
No comment

Matter 10 – Economic development site allocations, deliverability and viability

To put Snetterton Heath in context, it is worth noting the opening words of the Cambridge-Norwich Tech Corridor report: "The Cambridge Norwich Tech Corridor will create over £500m of innovation-led growth, investment in infrastructure, housing and skills. We have all the ingredients for the growth: emerging sectors, low cost space, infrastructure (including the recent dualling of A11), networks and a fast growing economy."

10.1 Have all sites put forward for allocation been considered through a robust SA process, including the consideration of reasonable alternatives?

No comment on allocated sites as Snetterton Park is an existing employment and retail site, albeit that part of it is inexplicably excluded from the GEA.

10.2 What site selection methodology has been used for employment sites?

No comment – although Breckland will answer this one questions allocation Greenfield land rather than identifying the true boundaries of the GEA.

10.3 Are the sites the most appropriate option given the reasonable alternatives?

See Sustainability Report (Appendix VII pp. 493, 498 and 502).

10.4 Are the site allocations based on a sound assessment of infrastructure requirements and their deliverability, including landowner support?

The allocation of further land assists with the funding of essential electricity upgrades and boosts the scale and importance of electrical deficiency. This co-ordinated approach was recommended in the Bruton Knowles report at paragraph 8.44 'Strategic Action'.

10.5 In broad terms, is the economic development identified in Policy EC 01 based on a sound understanding of financial viability?

Although we have no wish to challenge the allocations at Snetterton, it is inexplicable that a major portion of Snetterton Park is excluded from the existing GEA, whereas surely brownfield development should come ahead of Greenfield development, as identified in the Breckland Sustainability Appraisal pp. 498 and 505 (Appendix VII).

The proposed commitment to a new electricity substation at Snetterton significantly boosts the financial viability of the site and the LPA's grasp of economic reality (Appendix XIII). This is highlighted as a weakness in the Bruton Knowles report, paragraph 7.3.2, but Table 7.1 (p. 56) shows Snetterton 26% of B1, B2, B8 space in the growth corridor. It also shows 2.354 square metres of 9.082 square metres total and 86% of B8 space at Table 7.4.

10.6 How has the continued suitability of General Employment Areas and their boundaries been considered? Is it robust?

The boundary of the Snetterton GEA is totally inappropriate as it does not reflect the reality of the existing authorised use on Snetterton Park. Its continued use is highly appropriate. As Bruton Knowles state at paragraph 72.9, rents will drive business away from Cambridge and Norwich, so too will traffic. It is easier to commute to Snetterton from Wymondham or Attleborough.

10.7 To be effective and consistent with national policy, should Attleborough Employment Allocation 1 refer to the need to consider the historic environment?

No comment.

10.8 Should Attleborough Employment Allocation 1 refer to 'at least' 10 hectares to ensure consistency with Policy EC 01?

No comment.

10.9 To be effective, should Snetterton Employment Allocations 1 & 2 refer to the need to consider the historic environment?

One imagines the only historic environment of Snetterton is its former airfield, which should be attributed little weight.

10.10 Are Saved Policies: D5 (Land East of Dereham Business Park); SW2 (Land to the North of the Eco-Tech Centre); SW3 (Land to the West of the EcoTech Centre); and TH30 (New Employment Land) (of the Thetford Area Action Plan) still considered to be deliverable, given they were originally allocated in 2012? Do they still have landowner support? Why have the sites not been delivered over the past 5 years? Should they be considered as new allocations?

No comment.

10.11 Is the settlement boundary set out in Map 6.3 of the Plan consistent with the boundary shown on the Swaffham Policies Map?

No comment.

Matter 11 – Town Centre and Retail Strategy (Policy EC 05)

11.1 Is the retail and town centre hierarchy identified in Policy EC 05 justified?

Please note that the July 2016 plan allocates a significant proportion of Snetterton Park as retail land and therefore retail should not be restricted to town centres.

11.2-11.6 No comment.

Sustainability

Paragraph 19 of the NPPF states: *Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.*

We submit that the current wording of Policy EC02 does not achieve that objective, nor does it *proactively meet the development needs of business*, in accordance with paragraph 20. Indeed, these policies are already proving to be a *potential barrier to investment* (paragraph 21) and do not *positively and proactively encourage sustainable economic growth*.

Paragraph 21 continues to state: *Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.* Policy EC02 does not do this and we repeat that it is not therefore sound.

Snetterton Park Limited are prepared to take a flexible attitude as to how the Local Plan should be adjusted. The simplest solution would be to extend the Snetterton GEA to cover the whole of the Snetterton Park land totalling 28 hectares (see map GEA extension - map 6.1 Summary of Snetterton Heath Allocations attached at Appendix I).

The majority of this land already has implemented planning consents for various market/retail uses. The remainder has been car parking for many years so it is effectively all previously developed land.

In these circumstances, whilst Snetterton Park have no objection to the new allocations being suggested north and south of the A11, it seems ironic that greenfield land is being promoted in preference to brownfield land. We do not suggest these greenfield allocations should be deleted, but merely that all the previously developed land is included within the GEA – in other words, the full 28 hectares of the Snetterton Park landholding.

In summary, whilst we support the promotion of economic development at Snetterton Heath and indeed the early suggestions that **at least** 20 hectares of land should be identified at Snetterton Heath as proposed in Policy EC01 and paragraph 6.14. But that **at least** seems to have been forgotten at paragraph 6.16 and there is the unnecessary suggestion that 20 hectares should be the maximum allocation.

Paragraph 6.7 of the Local Plan suggests that up to 74.7 hectares of employment land might be required yet the Local Plan suggests delivering less than this. What possible problem would there be in simply extending the GEA at Snetterton Heath to include the previously developed land which lies between GEA and the A11?

Conclusion

In conclusion, the aims of Snetterton Park Limited are:

- To get B8 allocation on their land
The reports imply that this is a sector that will experience most growth in the region. A good number of the enquiries that they have received from manufacturers also include substantial aspects of warehousing and logistics. A number of the enquiries have been from logistics companies. B8 allocation will assist the landowners to develop the site. Complete clarity in the planning policy will encourage development and enable the various landlords to compete on an even playing field.
- Clarity on how the rest of the site is zoned
Either get the whole site allocated as GEA land, or leave the GEA allocation as it is and get the rest of the land allocated as brownfield (a term that the Council has used in various documents to describe the site).

Currently the majority of the site has a very ambiguous status, which is not attractive from a development point of view. The second option (brownfield) might be preferable.

- The zoning implied in the Local Plan (motorsport and engineering will be actively encouraged), is understandable, but the Council reports indicate that growth on the A11 corridor will not come from manufacturing, but from logistics and other activities.

Where engineering hubs have been successful they have required intense support (i.e. Hethel, land supplied by the Council, no need to make a profit etc.). The Council has been proactive in resolving the power and transport issues in the area, which will greatly assist development in general. If it really wants more motorsport/engineering, it will probably need to put a support package together.

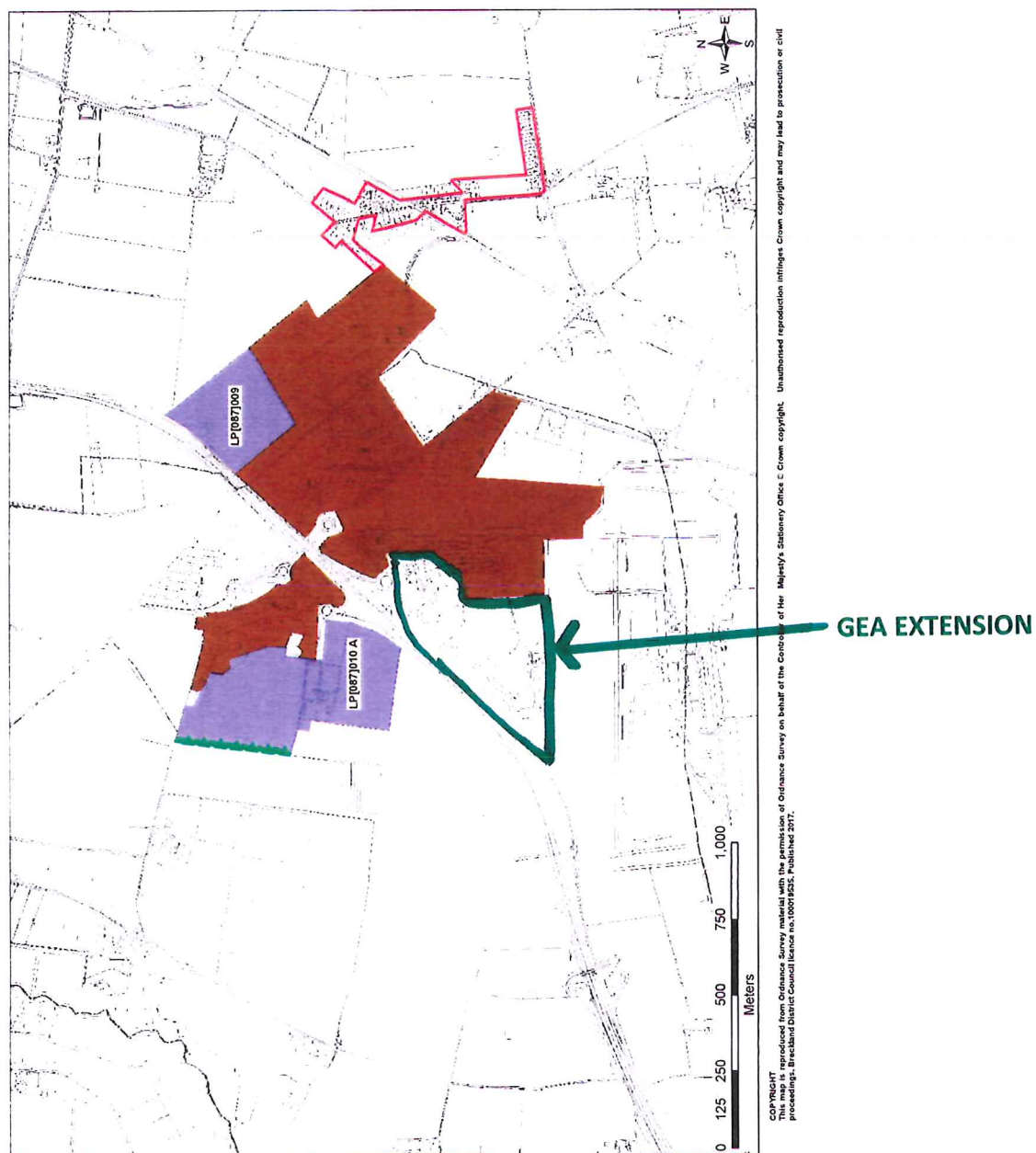
With the amendments suggested on this form, the Plan:

- will be positively prepared
- will not be subject to unjustified restrictions
- will be consistent with national policy

Appendix I

Snetterton Heath Allocations

Map 6.1 Summary of Snetterton Heath Allocations



Appendix II

February 22, 2016

The Chief planning Officer
Breckland Council
Elizabeth House
Walpole Loke
Dereham
NR19 1EE

Dear Sir,

Preferred Directions Consultation Document (January 2016 – February 2016)
Land at Snetterton Park
Representations on behalf of Kilverstone Ltd

We are instructed by Kilverstone Ltd to submit these representations to Breckland's Emerging Local Plan, Preferred Directions Consultation Document to ensure that we can be party to further consultations; and to enable the future development capacity of the site to be realised. As such we now submit representations in accordance with the specified consultation timescale which terminates at 16.00hrs on Monday 22nd February 2016.

Snetterton Park is a 67 acre Brownfield site in the middle of Snetterton Heath. Over the years it has been developed piecemeal from its original use as an airfield, to a Sunday market and more recently as a retail/commercial/destination site. Whilst well intentioned, the underfunded piecemeal development has resulted in what can best be described as an eye sore, in need of serious attention and sensible development and use. The site has the potential to be an asset to the area, providing a suitable location for commercial, light industrial, work-live, some small aspect of residential, power generation or warehousing space. It is also of a scale, that it might attract a single significant industrial/commercial occupier.

Despite the sites current appearance and the complicated planning and development history we hope that the some of its potential is apparent and that its inclusion into the local plan, as potential employment/ development land will be considered.

Chapter 4 of the Preferred Directions Consultation Document falls under the heading of 'Economic'. We broadly support the Economic objectives and the levels of employment

growth set out in the document, but think that it would benefit from some flexibility in the application of the policy, in the event that alternative sites (especially brownfield ones) come forward within the plan period. We support an employment strategy that provides greater flexibility to respond to current local market signals and economic needs as well as an ability to adapt to rapid change¹. Paragraph 7 of the National Planning Policy Framework (NPPF) defines the economic role of sustainable development as follows:

“An economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.”

With reference to ‘plan-making’, Paragraph 158 of the NPPF requires each local planning authority to ensure their Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

In addition, Paragraph 160 requires local planning authorities to have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, the NPPF recommends that the Council work closely with the business community to understand their changing needs and identify and address barriers to investment. This evidence base should be used to identify and assess the existing and future quantitative and qualitative business needs for land and floor space.

Snetterton Park is located on the southern side of the A11 and comprises some 67 acres (27ha) of broadly flat land. In our view Snetterton Park constitutes an equally appropriate and potentially better site for employment use than some of the identified sites in the Snetterton area as shown on Map 30.7 namely sites LP[077]003 and LP[087]010. Plan SP1 shows the extent of the Snetterton Park site and the area which we consider should be allocated for employment use.

Snetterton Park comprises the site of the former Snetterton Sunday Market which was one of the largest Sunday Markets in the UK. Approximately 50 acres (20ha) of the site comprises the market area, storage and maintenance areas and car parking for some 3000 cars. The remaining 17 acres (7ha) has been developed with a number of buildings with a combined area of some 5000m² which lend themselves to a B1, B2 or B8 use. The site benefits from substantial infrastructure including; hardstanding, vehicular access, drainage, mains services and car parking areas.

This brownfield site has strong defendable boundaries in the form of the A11 to the west, Snetterton Race Circuit to the south, to the east is the Homerton Industrial Estate which contains a number of commercial units occupied by small local companies for a range of uses including B1, B2, B8 and A1. To the north east on the opposite side of Harling Road there is a large commercial area dominated by large, substantial warehouses in B8 use. To

¹ The positive affect effects of the proposed residential developments in the borough may be difficult to quantify as they are only just being actioned. The new A11 however can only be described as resoundingly positive. It has created a ‘Buzz’ and a noticeable interest in the area (that was absent a few years ago), which will assuredly lead to rapid economic growth along the A11 corridor.

the North West, on the opposite side of the A11 there are a number of industrial buildings which contain a mix of B1, B8 and ancillary retail uses.

The Employment Growth Study prepared by Nathaniel Lichfield & Partners (NLP) on behalf of Breckland Council in November 2013 forms part of the evidence base for the emerging Local Plan. Snetterton Park falls under the heading of Snetterton Heath and paragraph 5.19 states:

"The Snetterton Heath Employment Area is located on the A11 between Thetford and Attleborough, on the former Snetterton Airfield. Two sites here have been designated for employment use, one on the northern side of the A11 (Snetterton North) and a far larger site to the south of the road, on part of the old airfield (Snetterton South). The Snetterton racing circuit is also at the airfield which is used for car and superbike racing events. In addition, the airfield also features Snetterton Park, a major visitor attraction, which accommodates a very large Sunday market and now includes the Model and Toy Expo. Snetterton Heath's proximity to the A11 provides excellent accessibility to the strategic road network." (my underlining)

Snetterton Park has its own vehicular access to both directions of the A11 via an existing roundabout which directly serves the south bound carriageway. Access to the north bound carriageway is via a further roundabout and the flyover which leads to the opposite side of the dual carriageway. The junction was designed to cater for the large vehicular movements generated by the former Sunday Market use which regularly extended to some 3000-4000 vehicular movements. The site's location within the A11 corridor, next to a grade separated junction, offers the potential to provide economic and employment growth for a wide range of industries and logistical uses which can contribute to both the Breckland and the regional economy. Breckland Council is part of a joint project commissioned with South Norfolk and Forest Heath councils with the aim of capitalising on the improved accessibility arising from the duelling of the A11.

The allocation of Snetterton Park for employment use would provide a valuable opportunity to add to the economic growth in an area which is best suited to attract inward investment and to support the growth of existing local businesses. Good travel connectivity and access to the District's major roads is essential to attracting employment generating business to the locality. In qualitative terms, the employment policies of the Local Plan should address the objectively assessed need for employment land.

The viability of any employment generating development at Snetterton Park is strong as the site lies adjacent to an established and successful location for business and has unique locational advantages. Currently Snetterton Heath is home to a mix of manufacturing, warehousing, logistics and office uses which are occupied by international and national companies including DPD, Fedex, Richard Johnston, QD and Foulger's transport as well as a number of smaller and medium sized units occupied by small local businesses.

In January 2016 Breckland Council granted planning permission to a locally based company to relocate their pet food manufacturing business to a purpose built factory with a floor area of 8760m² on the opposite side of the A11. The site comprises a green field site with an area of 2.9ha of agricultural land. In assessing the proposal the committee report concludes

"The proposal would provide a significant investment in economic development at Snetterton Heath. Although outside the defined Employment Area, the proposal would nevertheless be consistent with the Council's identification of the area for strategic employment growth and with the Government's wider growth agenda. The proposal would secure existing jobs and create additional employment. Significant weight must be given to this consideration in the planning balance. The site benefits from good links to the strategic road network and there is nothing to indicate that it would be likely to result in significant increases in traffic on unsuitable local roads. Nor is it considered likely that the proposal would give rise to other material adverse environmental effects due to noise or smell. Whilst the proposal would cause some harm to the rural landscape, for the reasons set out above, it is not considered that this effect would be significant. Weighed against the benefits of the proposal, the harm to landscape would not amount to a compelling reason for refusal."

In granting consent the Council clearly considered that the importance of securing an employment generating use within Snetterton outweighed i) a substantial number of objections ii) the site's use as agricultural land iii) an identified adverse effect on the rural landscape. This decision exemplifies the spirit of NPPF and should be commended

Snetterton Park has the potential to generate all of the benefits of the aforementioned proposal and in addition:

- It is centrally located within the Snetterton area (As can be seen on the plan SP1).
- It has strong boundaries on all sides which ensure the site is contained and cannot lead to sprawl.
- The site has previously been developed and its reuse will not have any adverse effect on any environmental consideration.
- Snetterton Park abuts a cluster of employment generating developments.
- There are no ownership or physical constraints to prevent this brownfield site from coming forward immediately, thus helping to meet the Council's stated objectives of concentrating employment growth along the A11 corridor.
- The allocation of the site might help to alleviate pressure to release other parcels of land in the Snetterton Heath area which comprise agricultural land or green field sites.
- The eastern boundary of Snetterton Park abuts existing allocated land as defined by Map 30.7 and by E.SN1.
- The scale of the site, presents the possibility of it being taken up by a large commercial concern.

The extension of the allocation across Snetterton Park is logical in planning terms and will help to concentrate employment generating development within the central area of Snetterton Heath.

The site has the potential to help create an economic centre in the District which will help further diversify Breckland's business base, providing high quality accommodation in an attractive, landscaped, well planned setting which will help attract inward

investment particularly from businesses attracted by the proximity of the site to the Snetterton Interchange and the A11.

Snetterton Park's location means it has unparalleled, direct access to the A11, Cambridge, the M11 growth corridor and Stansted Airport to the South and Norwich to the North. Snetterton Park offers considerable benefits both to the local and the wider economy and at the same time minimising the effect on the environmental considerations. We respectfully submit that the land shown on plan SP1 should be considered for allocation as an employment site.

As mentioned at the beginning of this letter, in the past proposals on the site have been piece-meal and all development has been self-funded. Whilst well intentioned, this approach has led to permissions that have not been built and expectations that have not been met. Moving forward the intention is to work with the council, commercial companies and the business community, to realise the potential of the site and economic growth in the area.

We trust the above representations will be taken into consideration. We would be grateful if you could confirm receipt.

Yours faithfully

Brian Hill

Appendix III

Appendix IV

EDP 24 GUY'S CARPETS

s Altro Flooring • Wood Flooring Laminates

STORY SEARCH

News
Date: 01/01/2008

The site where Norfolk really matters

Friday, January 25, 2008 | 10:57

Home
NEWS
News
Text only
Newsletter
Video News
E-edition
Obituaries
Family Notices
Commentary
Frontline
Environment
Farming News
Personal Finance

SPORT
Sport News
Neil Doncaster
Fan's Eye
Final Word
Kevin Piper
Norfolk
Equestrian

BUSINESS
Business Site
Business Guide
Recruitment
Tourism Awards
Recruitment
Awards
Property Awards

ENTERTAINMENT
Previews
Listings Search
Submit a listing
Eating Out
Films
Reviews

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MY NORFOLK

LIFESTYLE

INFO

INTERACTIVE

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Terms &
Conditions
Text The Editor
Desktop News
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NEWS

Market could become a modern shopping centre

ADAM GRETTON

25 January 2008 06:00

A popular Sunday market is set to become a "flagship" shopping, business and tourist attraction under plans to boost Norfolk's advanced engineering and motorsport industries.

More than a million visitors a year already flock to the weekly market next to the Snetterton racetrack, which celebrates its 25th birthday this year.

But owners of Snetterton Park unveiled ambitious proposals to change the face of the 70 acre site yesterday with a major redevelopment that embraces the district's Rural Enterprise Valley (REV) project.

Cliffsky Ltd, which owns the prime site off the A11, has already submitted an outline planning application to demolish some of the market buildings and the derelict Ships Galley restaurant to create seven new industrial units, four of which would become motor dealerships.

The second phase of the redevelopment is set to be sent to Breckland Council in the next couple of months, which will include the relocation of the Sunday market into a purpose built undercover facility for its 100 traders.

Trevor Warner, director of Cliffsky Ltd, which owns the market site that includes the "world's greatest" model shop and model car race track, garden centre, and restaurant said the scheme was inspired by Motorsport Vision's proposals to expand the Snetterton circuit. It also links in with a new 54-bedroom motel and restaurant at the site of the Flame Restaurant, which was given the go-ahead last month.

He added that the plans embraced the REV project's philosophy to boost the advanced engineering and motorsport sectors along the A11 corridor by potentially creating further industrial and warehousing buildings at Snetterton Park in five years time.

"We have had 25 years of a Sunday market, but these plans will see a massive flagship redevelopment and complete rebuild, which is very exciting. It will become a tourist attraction in its own right."

"Twenty years ago the steel shack market stalls were innovative, but people's shopping habits have changed and they don't want to be blown about in the wind and rain. It is not going to be a shopping mall like Chapelfield in Norwich, but it will be a quality environment and undercover open plan market," he said.

Mr Warner said the cost of the scheme had not yet been finalised, but added that the plans to bring the market site into the 21st century could begin by the end of the year, if approved by Breckland Councillors.

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Appendix V

Breckland Authorities Monitoring Report 2017

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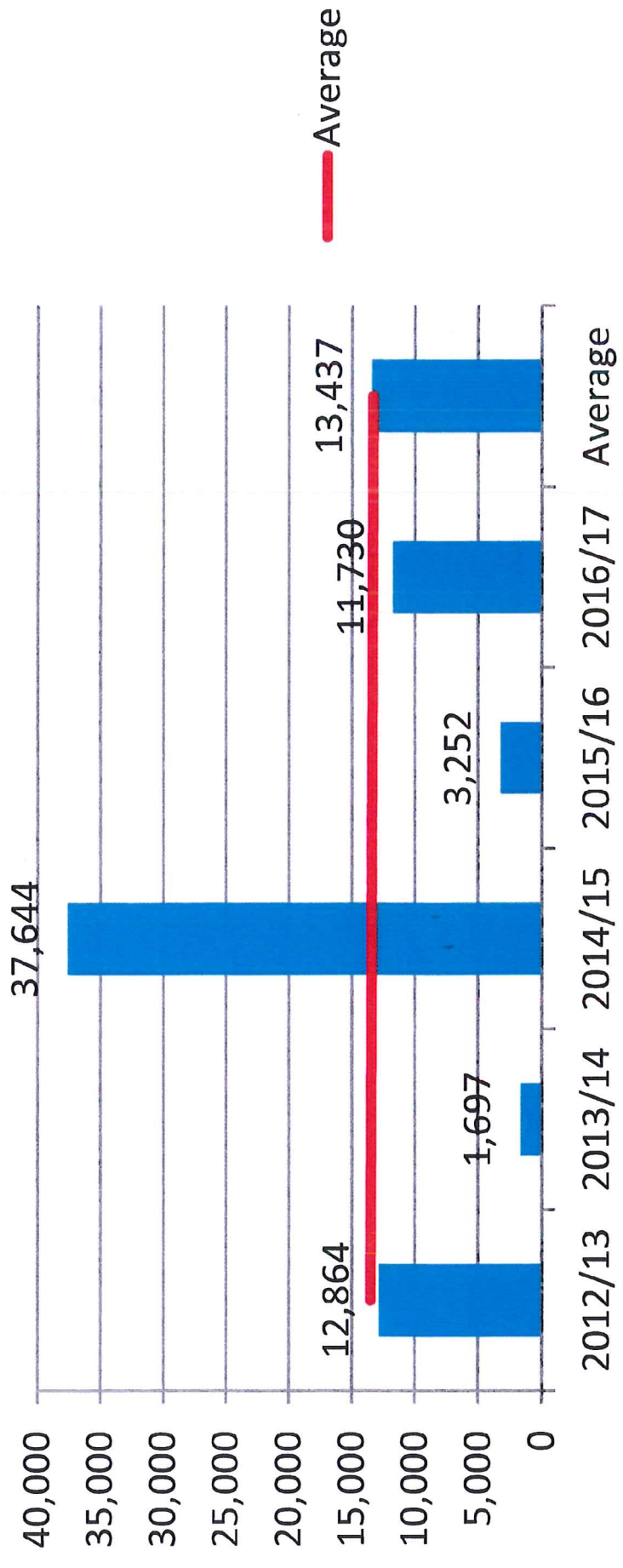
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Table 15.1 Floorspace by Total Floor Area 2010/11 to 2016/17

Appendix VI

Breckland commercial floorspace

67,187 sq.m. 2012-2017



Appendix VII

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Site	SA Objectives																			
Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Summary
Summary comments: The sites are situated upon agricultural land of high agricultural quality. The sites are all situated within an area of moderate-high landscape sensitivity. Sites LP[025]031 and LP[025]032 are situated within a groundwater source protection zone and, therefore, score negatively against criteria 2 and 3. The sites generally score well against the assessment criteria, particularly against those around economic activity.																				

Table 17.2 Sustainability Appraisal of Sites in Dereham

Snetterton

Site	SA Objectives																			
Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Summary
LP[087]001	-	+	+	+	o	+	+	+	+	+	o	o	o	+	o	o	-	+	+	The site scores negatively against criteria 1 due to being situated upon greenfield land of grade 3 agricultural quality. The site scores neutrally against criteria 5 and 11, but is distant from key services and facilities.

Site Reference	SA Objectives																			Summary
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	
LP[087]009	-	+	+	+	o	+	+	+	+	+	o	o	o	+	o	o	-	+	+	The site scores negatively against criteria 1 due to being situated upon greenfield land of grade 3 quality. The site scores neutrally against criteria 5 and 11, but is distant from key services and facilities.
LP[087]010A	o	+	+	+	o	+	+	+	+	+	o	o	o	+	o	o	-	+	+	Although the site is situated upon grade 3 agricultural land the site is also partially brownfield and therefore scores neutrally against criteria 1. The site scores neutrally against criteria 5 and 11, but

Site	SA Objectives																			
Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Summary
<p>Summary comments:</p> <p>Most of the sites score neutrally or negatively against criteria 1 due to most sites being greenfield even though they are within close proximity to the existing General Employment Area.</p> <p>The majority of the sites score well against the SA criteria, particularly against the criteria around Economic Activity.</p>																				

Table 17.3 Sustainability Appraisal of Sites in Snetterton

Swaffham

Site	SA Objectives																			
Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Summary
SW2	-	-	-	o	+	+	+	+	-	o	+	o	+	+	o	o	-	+	+	The site scores negatively against criteria 1 due to the site being situated upon greenfield land of grade 3 agricultural quality. The site scores negatively against criteria 2 and 3 due to being situated within a groundwater source protection zone. The site is situated within an area of moderate-high

Appendix VIII

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Affordable

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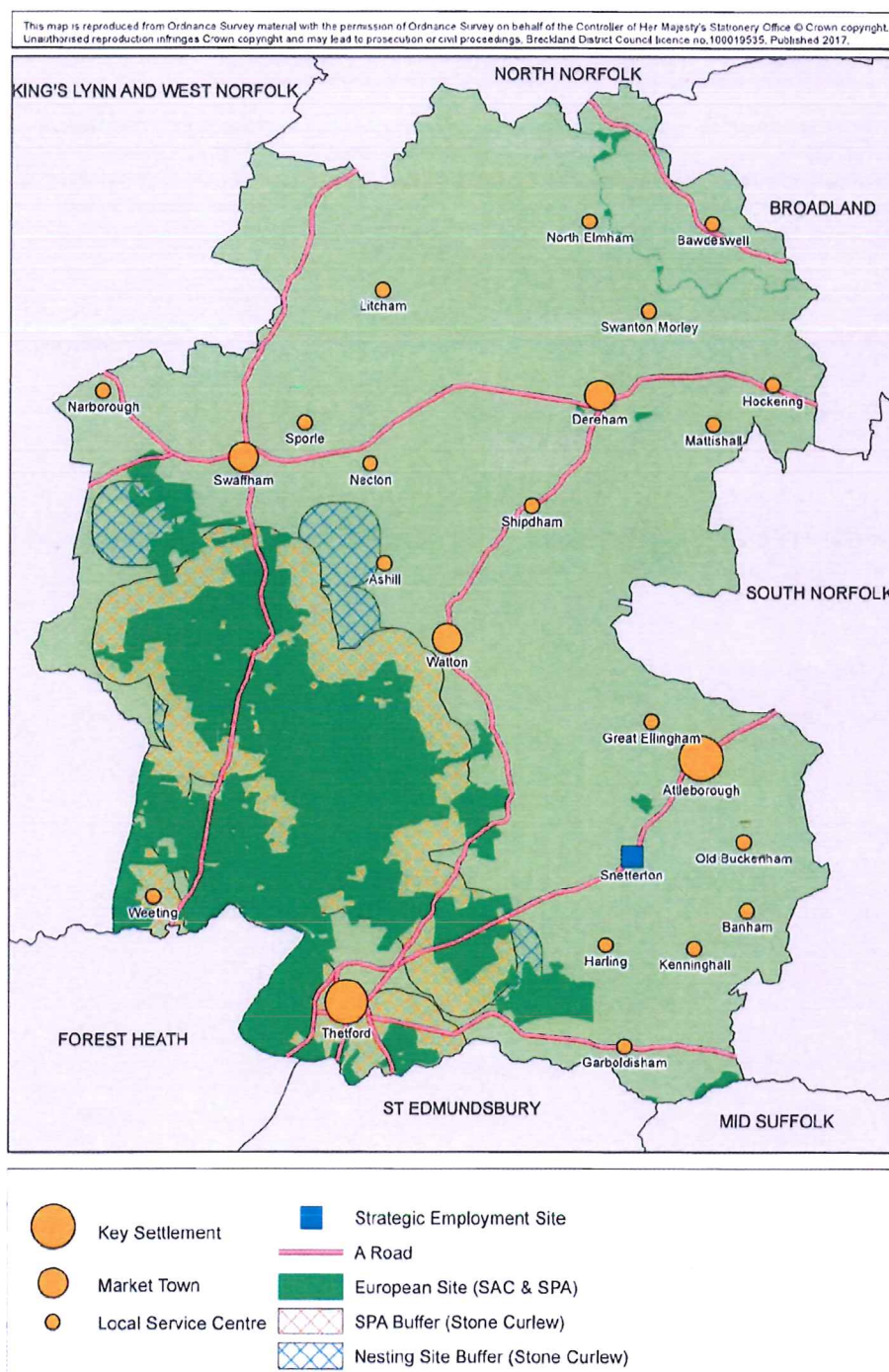
Unaffordable

Appendix IX



Appendix X

Figure 1.1 Breckland Key Diagram



1.21 Over the Local Plan period the population is set to grow from 131,857 in 2012 to 153,678 by 2036 (ONS 2014 based sub-national population projections 2012-2036). In the main quality of life is good with official crime rates being low and is generally decreasing. However, there are pockets of health and disability related deprivation,

Appendix XI

Appendix XI

Extracts from submission plan – Keymer Cavendish comments marked in green in text

Snetterton SA

EC 02 Snetterton Heath - The proposed policy seeks to direct the types of employment uses within the employment area. This approach allows compatible uses to be located adjacent to each other. The approach scores well against the criteria related employment uses.

EC 03 General Employment Areas - The policy seeks to protect general employment areas within Breckland for employment uses. This approach scores well against the sustainability objectives based around the economy and complies with an Employment Growth Study undertaken in 2013. However, restricting development on employment sites may be detrimental to the provision of facilities and services in settlements and lead to vacant land that could be used to provide homes.

Main Local Plan

2.31 It is considered that the employment site provided at Snetterton Heath offers the opportunity to help deliver the strategic employment needs of the District, while smaller sites towards Attleborough have the potential to provide for small to medium enterprises and to assist in providing more local employment for the town. Given that the potential sites form part of the entry into the historic market town they are key gateway sites and must be sensitively designed.

6 Economy and Employment

Economic Development

6.1 The size and dispersed nature of the area's population presents significant challenges for the Council in delivering balanced economic growth. Breckland's strategic position is emphasised by the good road communications offered by the A47 and A11, the latter of which has recently benefited from major improvements providing a complete dualled road linking Norfolk to the rest of the country for the first time. The five market towns, Attleborough, Dereham, Swaffham, Thetford and Watton, are an essential component of the economic and social structure, acting as service centres to their rural hinterlands. The area has seen a rapid population growth, increasing pay levels and low rates of unemployment and there is a trend for the overall number of jobs to increase. However, average wages remain relatively low in comparison with regional and national levels due to a lower level of qualifications of people in the District and a low level of skills required by many of the available jobs.

6.2 The Employment Growth Study and Employment Land Review 2013 for Breckland, identifies that Breckland has a relatively successful economy recording significant job growth over the last two decades. The business base is dominated by small and medium-sized businesses but with below average levels of business start-ups and self-employment. Workforce productivity is relatively low which may in part reflect a slight mis-match in the local economy between lower skilled jobs available, and a more highly qualified resident workforce, many of which commute out of the District to higher paid employment elsewhere.

6.3 Employment space in the District is dominated by industrial uses and tends to be concentrated around Breckland's larger towns. The rural economy also accommodates important hubs of economic activity, particularly with regards to small scale office and workshop space. The District has seen moderate levels of new development over the past eight years, the majority for B1c/B2 manufacturing uses and B8 warehousing.

6.4 Demand for employment space remains steady, focused upon small scale industrial accommodation. The majority of commercial property market activity is concentrated within the settlements of Thetford and Dereham and, to a lesser extent Attleborough, with very limited activity occurring outside of these key areas. Some of the District's stock is dated and/or poorly specified with

evidence that this issue has been constraining industrial activity – specifically in the past in terms of attracting new industrial occupiers.

6.5 Within this context, the Employment Growth Study and Employment Land Review 2013 identified a number of policy issues for consideration:

- Consider rationalising existing and future supply of industrial space by seeking to concentrate this space in the District's key locations and areas of strongest market demand (such as Thetford and Attleborough). This would help support critical mass of development on fewer sites, provide a clearer signal to potential investors and also support any necessary upfront infrastructure works. Future development of employment space in the District should also build upon, and take advantage of, significant infrastructure improvements associated with the duelling of the A11 from Fiveways to Thetford as well as the proposed Thetford SUE which will also provide a key driver of economic growth within the District over the plan period.
- In the more peripheral areas of the District where demand levels are weaker, it may be necessary to adopt a flexible approach to bringing forward employment sites by allowing the development of other higher value non-B uses on part of allocated sites, in order to unlock the site's potential and fund any associated infrastructure works.
- At the same time, the Council could consider releasing some of the District's poorer quality and poorer performing sites in more peripheral locations characterised by relatively low market demand and that suffer from constraints to (re)development (such as proximity to residential uses). This would help to ensure an appropriate distribution of employment space across the District in accordance with market demand.
- Over the longer term (i.e. 20 year plan period), it is recommended that any new provision of office space follows an enterprise centre type model, with small units for small and medium enterprises (SMEs) and local start-ups and shared workspace and networking opportunities. It is also recommended that any new office space is focused upon Breckland's town centres, benefiting from a more attractive working environment and range of facilities for staff.
- Given the rural nature of much of the District, it is also important that the Local Plan continues to recognise the important role of rural settlements in providing employment space and opportunities for local residents. This is unlikely to justify specific land allocations, however the provision of a positive policy framework (e.g. re-use of buildings) that encourages rural enterprise and diversification schemes represents the most appropriate way of ensuring that rural needs can be met.

6.6 The NPPF requires LPAs to develop a clear understanding of the business needs and markets operating in their areas. It also sets out the need for evidence to be assembled to understand the need for land and floorspace, existing and future supply of land for economic needs as well as understanding the qualitative issues associated with existing employment provision.

6.7 The Employment Growth Study and Employment Land Review 2013 for Breckland, considered the requirements from the NPPF. The study also utilised a number of demographic and economic models as well as involving local stakeholders to map out possible growth scenarios for the District. Four different scenarios of future employment space requirements were considered for the period up to 2031; these were based on a number of approaches which reflect economic growth, past development trends and potential labour supply factors. The majority of these scenarios point to a lower level of future economic growth in Breckland than the District has achieved in the recent past, partly reflecting a more pessimistic post-recession economic outlook. The overall space requirements relating to these scenarios range from 134,235 sq.m to 310,180 sq.m of all types of employment space, implying in broad terms a need for between 31.6 ha and 74.7 ha of employment land. The majority of this spatial requirement relates to industrial (B1c/B2/B8) uses.

6.8 The Local Plan seeks to deliver 64 Hectares of employment land over the plan period. This figure sits between the 'Policy on' job growth scenario, which takes account of planned investment and intelligences about future sector/site based potential as an uplift on East of England Forecasting Model projections and the past trends in completions of employments space scenario. The

Employment Growth Study and Employment Land Review 2013 recommended that allocating at least the baseline job growth requirement whilst providing capacity within the District to meet the slightly higher alternative 'policy-on' requirement.

6.9 The completions data has been assessed between 2012-2016 to ensure that the data used within the 2013 study is still accurate. Whilst the level of completions over the period has increased slightly when averaged over the 12 year period this would not result in a dramatic increase in the amount of employment land required. The baseline projections of employment growth and scenarios accounting for planned investment are also still considered to be up to date as of 2017.

6.10 The emerging SHMA has considered an approach to "balance out" the need for new dwellings with the expected level of new jobs forecast for the Central Norfolk Housing Market Area (HMA), utilising the latest information from the East of England Forecasting Model. For Breckland, an uplift is applied to the Objectively Assessed Need (OAN) for the District to account for the growth in jobs.

6.11 The Local Plan seeks to save policies in Dereham, Swaffham and Thetford totalling at least 34 hectares of employment land. At least 10 hectares of employment land in Attleborough and at least 20 hectares of employment land in Snetterton has been allocated through the Local Plan. It is considered that this increase in employment provides a balanced approach across the District over the plan period.

6.12 Attleborough Neighbourhood Plan moved to the Submission Draft Plan stage in February 2017. Throughout the Neighbourhood Plan making process, the Attleborough Neighbourhood Plan has sought to allocate the 10 hectares of employment land and has actively sought to highlight an area of search for employment land. Due to the progression of the Local Plan and the need for certainty around the provision of employment land in the area, the Local Plan has sought to allocate the area that the Neighbourhood Plan has identified.

6.13 Located in the centre of the District, Watton accommodates a reasonable amount of industrial space (with a focus on light industry and engineering) and a steady flow of industrial requirements from local occupiers. The office market is very small in scale, with very limited accommodation for office users. Available supply of employment space comprises just over 2ha made up of small pockets of undeveloped land and outstanding planning permissions across the town's existing sites (including at Norwich Road Industrial Estate, Threxton Road Industrial Estate). This demand / supply balance appears to be relatively well matched, with no identified need for additional employment space in Watton

Policy EC 01 Economic Development

For the period 2011 – 2036, 64 Hectares of employment land will be allocated to allow for a range and choice of employment sites to meet economic need and demand. The distribution of these new employment allocations will reflect sustainability principles, the overall spatial strategy and the development needs of local communities. The spatial distribution will be as follows:

Attleborough – at least 10Ha

Dereham - at least 3Ha (consisting of the specific allocations identified in the Sites Specific Policies and Proposals DPD - Policies D5 – which has been identified as a saved policy for this Local Plan)

Swaffham – at least 9Ha (consisting of the specific allocations identified in the Sites Specific Policies and Proposals DPD– Policies SW2 and SW3 - which have been identified as saved policies for this Local Plan)

Thetford – at least 22Ha (consisting of the specific allocation identified in the Thetford Area Action Plan - Policy TH30 - which has been identified as a saved policy for this Local Plan)

Snetterton – at least 20Ha

6.14 Policy EC 01 sets out the amount of employment land to be allocated within the Local Plan. It proposed that for the period 2011 - 2036, 67 hectares of employment land would be allocated to allow for a range and choice of employment sites to meet economic need and demand. The distribution of the new employment allocations proposed was as follows:

Attleborough - at least 10 hectares

Dereham - at least 3 hectares (consisting of the specific allocations identified in the site specific policies and proposals DPD - Policies D4 and D5 - which have been identified as saved policies for the Local Plan)

Swaffham - at least 9 hectares (consisting of the specific allocations identified in the site specific policies and proposals DPD - Policies SW2 and SW3 - which have been identified as saved policies for the Local Plan)

Thetford - at least 22 hectares (consisting of the specific allocations identified in the Thetford AAP – Policy TH30 - which has been identified as saved policies for the Local Plan)

Snetterton - at least 20 hectares

6.15 The approach to Dereham, Swaffham and Thetford is to carry forward allocations identified within both the Site Specific Policies and Proposals DPD and Thetford Area Action Plan. It is not therefore proposed to allocate new sites through the Local Plan.

6.16 In line with the Employment Growth Study the Local Plan seeks to allocate 20 additional hectares of employment land at Snetterton Heath and 10 hectares of employment land at Attleborough. The 10 hectares of employment land at Attleborough has been identified through the Neighbourhood Plan, but has been formally allocated through the Local Plan in order to ensure that the requirements of the Employment Growth Study are fulfilled through the lifetime of the plan.

6.19 The two allocated sites provide a total of 28.82 hectares, however in line with government guidance, a 20% reduction has been applied to convert from gross to net with a further 10% reduction applied to allow for appropriate landscape screening, layout and design, resulting in a total of 20 hectares net internal employment land from the two preferred sites.

6.20 Further to this, a change to the General Employment Area (GEA) is proposed by removing the landfill site from the GEA (SNE 01) and reallocating this to the area to the north of site LP[087]011 (SNE 02). This change seeks to reflect the existing uses on the GEA. The proposed area of landfill to be removed is 7.8 hectares, and the extension proposed to the GEA, as shown on the maps, is 11.1, however when the 30% gross to net multiplier and 10% landscaping multiplier is applied this comes to 7.77 hectares.

Snetterton Employment Allocation 1

Land to the north west of the General Employment Area (LP[087]010A)

Land amounting to 14 hectares (net) is allocated for employment use (within Classes B1 and B2 and B8 of the Use Classes Order) to the north west of Snetterton North General Employment Area. Development will be subject to compliance with the following criteria:

1. Development is laid out in a manner that does not preclude the potential for future development in the vicinity;
2. Proposals for employment development within class B1 and B2 of the Use Classes Order (as amended) will be preferred;
3. Provision of safe highway access from Chalk Lane;

4. Suitable noise attenuation measures (which could include building design measures, screening, fencing or bunding) are provided to avoid harm to nearby residential amenity;
5. Provision of new structural landscaping to the western boundary of the site.

6.21 The site is situated upon 20 hectares of grade 3 agricultural land with the A11 to the south of the site and the existing General Employment Area to the east. The site frontages onto the A11 and has access to the existing general Employment Area through Chalk Lane. Norfolk County Council Highways, through consultation responses, have not raised any objections regarding the site.

6.22 The site has very few constraints; however, it is noted that the site is within close proximity (1.3km) to the village of Snetterton North End. However; due to the topography of the landscape and appropriate screening it is not anticipated to have a significant impact upon the existing residential properties.

Snetterton Employment Allocation 2

Land to the east of the General Employment Area (LP[087]009)

Land amounting to approximately 6 hectares (net) is allocated for employment use (Within Classes B1, B2 and B8 of the Use Classes Order) to the east of the Snetterton South General Employment Area. Development will be subject to compliance with the following criteria:

1. Provision of safe highway access from Harling Road;
2. Proposals for employment development within class B8 of the Use Classes Order (as amended) will be preferred;
3. Appropriate design and layout in keeping with the site's location as a key gateway with frontage onto the A11; and
4. Appropriate noise attenuation measures are provided at the northern border of the site with the A11 trunk road, if required.

6.23 The site is situated upon 8.8 hectares of Grade 3 agricultural land to the north of the existing General Employment Area. The site frontages onto the A11 to the north and has access to the existing General Employment Area through Harling Road. Norfolk County Council Highways, through consultation responses, have not raised any objections regarding the site.

6.24 The site is currently subject to a live planning application (3PL/2013/0727/D) comprising a mix of B1, B2 and B8 uses. The permission proposes access to Harling Road, which has been completed.

6.25 No fundamental constraints to the development of the site have been identified.

Policy EC 02 - Snetterton Heath

All proposals at Snetterton Heath will be determined subject to criteria a) to e) of Policy EC 03 General Employment Areas. The distribution of employment development across the site is subject to the following:

1. Within area LP[087]010 as defined on the policies map, 20ha of land is allocated for B1 and B2 use. The layout of any development should not prejudice future expansion of the site;
2. Within the southern extent of the Snetterton General Employment Area as defined on the policies map, proposals for employment use within classes B1 and B2 of the Use Classes Order (as amended) will be preferred. Proposals that are associated with motorsport, automotive and advanced engineering will be encouraged; *too restrictive*

3. Within the eastern extent of Snetterton General Employment Area as defined on the policies map, proposals for employment development within class B8 of the Use Classes Order (as amended) will be preferred; and
4. Proposals that create a new edge to the employment area shall be expected to provide appropriate boundary treatment to minimise the impact on the landscape, having regard to the principles of the Landscape Character Assessment.

Reasoned Justification

6.26 Draft Strategic Policy PD06 that was subject to consultation in January/ February 2016 identifies Snetterton Heath for an allocation of at least 20ha of new employment land over the plan period. The existing area is characterised by a number of different types of employment use that have developed as distinct clusters of activity which have established over time. This policy seeks to reflect the findings of the Cambridge to Norwich Technology corridor study and previous work under the auspices of the Rural Enterprise Valley (REV) by promoting motorsport and advanced engineering associated with the race track, as well as building on the area's successes within the distribution and manufacturing sectors. The policy seeks to direct particular types of activity within the 'B use classes' to specific areas of the site to promote clustering and capitalise on the inter-relationships between the activities carried out across the site.

6.27 The northern extent of Snetterton Heath, north of the trunk road, has a mixed character with a range of general industrial uses and planning permission was granted on 19th January 2016 for a new general industrial operator. In this area, proposals for new general industrial development would be acceptable having regard to the nature of the existing development.

6.28 The southern extent of Snetterton Heath, south of the trunk road and west of Heath Road, is characterised by the motor racing track and former Snetterton Park and comprises a range of existing buildings and established land uses. This area has excellent visibility from the A11 *and established retail use*. It provides the opportunity to direct the development and intensification of motorsport and advanced manufacturing uses, building on the proximity of this part of the site to the race track. The area provides opportunities for co-location and access to the track for automotive testing and related activity.

6.29 The eastern extent of the site (south of the A11 and north-east of Heath Road) contains a range of principally storage and distribution uses, including a rail head. Therefore, to ensure the delivery of the overall vision for the site, it is appropriate to direct new uses falling within Class B8 of the Use Classes Order to this location. *That part of the GEA closest to the access roundabout has established retail use*. Such uses do not require such close relationship to the track and due to their higher land take and lower employment density, such uses are therefore best directed towards this area of the site. This area offers potential opportunities to support the transshipment of goods to road from rail.

6.30 The General Employment Area boundary for Snetterton Heath is proposed to be amended to exclude an existing landfill site that does not provide deliverable opportunities for employment development within the plan period. An additional area of brownfield land at the former Snetterton Park is proposed to be included in the designation in order to provide an opportunity to support re-development for B class employment development to this part of the site. This approach will help to support the wider vision for the site.

6.31 The above strategic approach to the use of the site will ensure that the greatest opportunities for clustering and maximising higher job density uses in key locations are maximised.

General Employment Areas

6.64 As identified on the Policies Map, there are a significant number of employment areas across the District, each of which makes a contribution towards the local economy and provides an important source of local employment.

6.65 Employment uses are traditionally defined as Use Classes B1, B2 and B8 under the Town and Country Planning (Use Classes) Order 1987. However the diversification of the economy means that employment opportunities now emanate from a wider range of uses. These can be complementary to existing industrial uses and provide valuable supporting services such as cafes and nurseries. However, the intensification of individual uses or the cumulative impact of a number of non B1, B2, B8 uses in the same vicinity can reduce the functionality of employment areas for industrial based employers.

6.66 Proposals will be expected to complement their surroundings and not result in any unacceptable impacts on amenity or a severe impact on the local highways network. Proposals will also be encouraged to contribute towards the identified need to make provision for both small and start-up businesses.

6.67 The policy incorporates proposals for mixed use developments to address an issue raised in the Employment Growth Study, suggesting the need for a flexible approach to bring forward employment sites by allowing the development of other higher value non-B uses on part of allocated sites, in order to unlock the site's potential and fund any associated infrastructure works. Appropriate proposals to diversify and ensure the long term sustainability of existing employment areas will therefore be supported where they contain a significant employment element; contribute positively to the viability of the employment land and would not undermine, and are otherwise compatible with, existing employment uses.

Policy EC 03 General Employment Areas

Sites that are identified as General Employment Areas on the Policies Map will be protected for employment use. Proposals to accommodate new employment development (B1, B2 and B8 uses) will be permitted on General Employment Areas where the following criteria apply:

- a. It is not a town centre use, unless the location is sequentially preferable and need has been demonstrated; *note that part of the GEA closest to the access roundabout has established retail use.*
- b. It will not undermine the function of the wider employment area;
- c. The scale, bulk and appearance of the development is compatible with the character of its surroundings;
- d. There is no significant detrimental health impacts, (assessed through a health impact assessment where appropriate), on the amenity of neighbouring land uses and the character of the area by virtue of increased levels of noise, odour, emissions, or dust and impacts on light; and
- e. The traffic generated does not have a severe adverse impact on local amenity, highway safety or the operation of the highways network.

Proposals for mixed-use development in identified employment areas will be supported provided that they:

- Incorporate a significant employment element;
- Are compatible with existing employment uses;
- Support the improvement of an employment area that is in need of upgrading;
- Do not constrain the operations of adjoining businesses; and
- Are capable of reinstatement for business and industrial use.

Policy EC 04 Employment Development Outside General Employment Areas

Proposals for employment uses outside of the identified General Employment Areas and allocated sites will be permitted where:

- a. It is demonstrated that there are no other suitable sites available on identified or allocated employment sites; and/or
- b. There are particular reasons for the development not being located on an established or allocated employment site including:
 - 1. The expansion of an existing business;
 - 2. Businesses that are based on agriculture, forestry or other industry where there are sustainability advantages to being located in close proximity to the market they serve; or
 - 3. Industries and/ or businesses which would be detrimental to local amenity if located in settlements, including general employment areas.
- c. The development of the site would not adversely affect the type and volume of traffic generated.

Replacement of Rural Buildings

The replacement of rural buildings for B Use Classes as defined in the Use Classes Order may be considered acceptable where the proposal:

- d. Involves the removal of a building that is substantially intact but is not a traditional building of clear architectural or historic interest;
- e. Represents a clear and substantial improvement in terms of size, scale, impact and design from the original; and
- f. The replacement buildings are well located to the existing buildings, unless it can be demonstrated that an alternative location would be visually less prominent.

The Council will consider the need for appropriate measures in order to maintain the visual appearance and architectural character of buildings and prevent the proliferation of buildings in the countryside.

Retail Hierarchy

It should be remembered that Snetterton Park has established retail use under planning permission reference 3PL/2009/1204/F

Visitor Economy - Tourism

6.91 Breckland's environmental and heritage assets, including the heaths and woodlands of the Brecks, the traditional market towns and the general tranquillity and remoteness of the Breckland countryside are the particular factors which attract tourists to the area. Whilst it is recognised that tourism is an important contributor to the Breckland economy and that some tourist development will seek to locate in the countryside, it is important that tourist related development takes place in a sustainable manner in line with local and national policies in order that it does not adversely affect the Breckland environment which attracts the tourist activity. The Brecks, Wensum Valley and Thetford Forest are key areas that attract visitors for both day trips and short stays. There are a wide network of footpaths, cycleways, bridleways, and public rights of way that provide excellent leisure and recreational opportunities. In addition, tourist attractions such as Banham Zoo also form large employers within the District.

6.92 Tourism is a growing part of the local economy. However, if not properly managed, it could have adverse impacts on the District's environment and the daily life of local people. The challenge is to enable and manage sustainable tourism, which will safeguard the countryside, heritage and culture for future generations while providing benefits to the local economy.

6.93 Sustainable rural tourism and leisure developments that benefit rural businesses will be supported where these respect the character of the countryside. The Council will also support the provision and expansion of tourist /visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres.

6.94 The policy recognises the valuable contribution that tourist related industries make to the local economy. The provision of visitor accommodation through new-build, conversion or expansion will be supported in appropriate locations. Proposals will be supported in line with the development hierarchy and in the rural area should be in accordance with the proposed rural policies in this Plan including the housing policies HOU 04 and HOU 05. Proposals for tourism development that may have an effect on Sites of European, National & Local Nature Conservation importance such as the Breckland SPA, the River Wensum and the Norfolk Valley Fens SAC, will have to meet the proposed environmental policies, covering Sites of European, National & Local Nature Conservation, notably ENV 02 and ENV 03. Camping and caravan sites are considered as tourism development not outdoor recreation.

6.95 In a rural District such as Breckland there are opportunities for hotel accommodation, cultural and leisure development to support the market towns and where applicable contribute to regeneration programmes. National planning policy identifies cultural facilities, leisure and hotels as town centre uses and therefore such uses are subject to the sequential approach and proposals should conform to the policy direction for town centres EC02. Proposals for serviced tourist accommodation in the rural areas should represent the most sustainable option to meet a particular need because it is a road related facility meeting the needs of road users or it involves the re-use of sustainably located traditional rural buildings such as a complex of redundant farm buildings or a large country property.

Policy EC 07 Tourism Related Development

The creation, enhancement and expansion of tourism attractions, and tourism infrastructure will be supported in accordance with the development strategy where this would enhance the existing tourism offer, benefit the local economy and be of a suitable scale and type for its location.

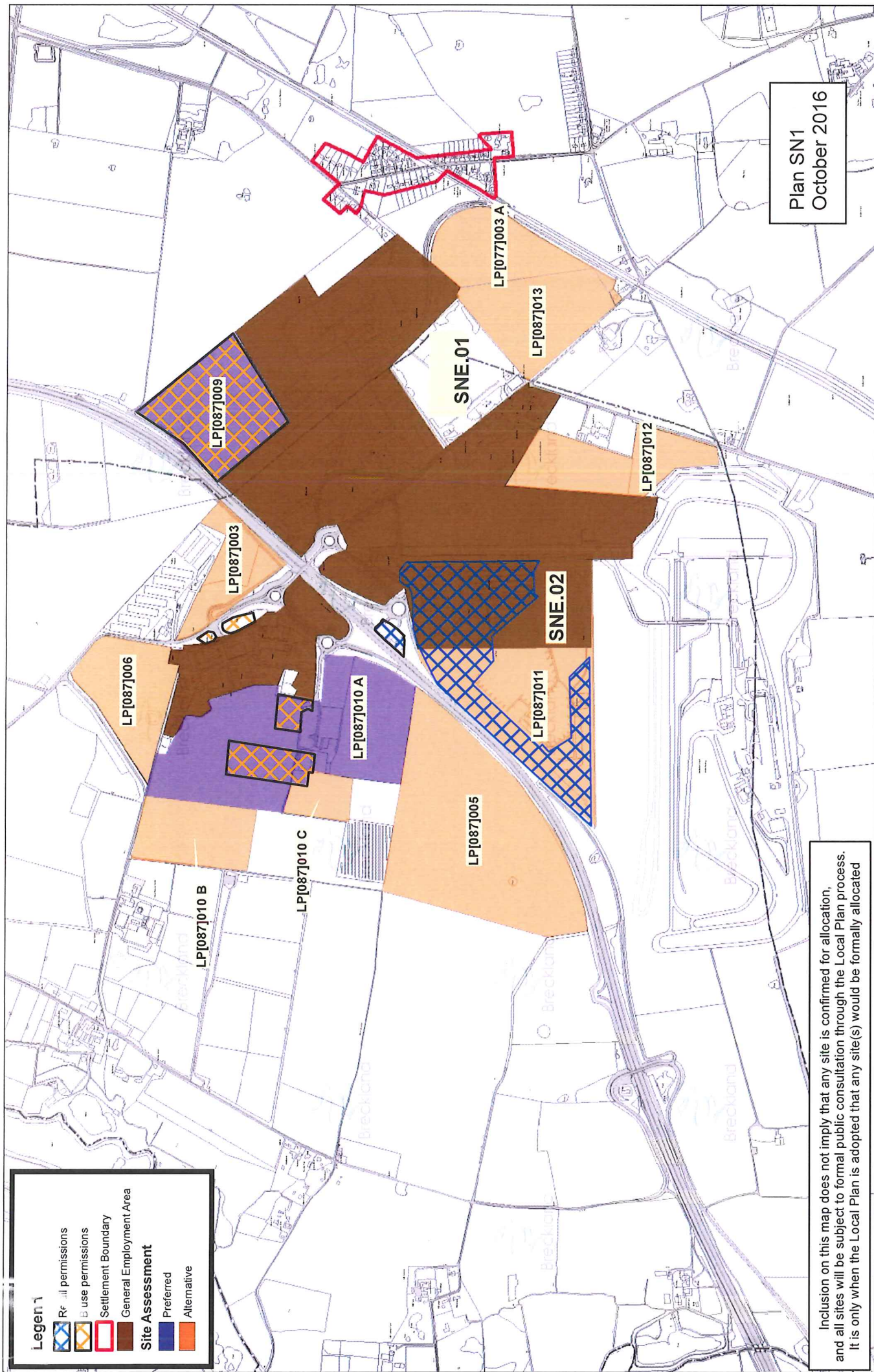
Development of an appropriate scale should be located where the environment and infrastructure can accommodate the visitor impact. Where a proposal is not readily accessible by public transport, then it will be supported where it relies on a specific geographical resource or contributions are made to improve accessibility.

Leisure, tourism and cultural development proposals and visitor accommodation attracting a significant number of visitors should be located within, or be accessible to, the five market towns. Smaller development proposals should be of a suitable scale and type to protect the character of the townscape and landscape within which they are situated.

Development proposals will be assessed against the extent to which they meet the following criteria:

- Support the vitality and enhance the role of the market towns as tourist and leisure destinations through encouraging greater visitor numbers;
- Bring regeneration benefits, particularly through the redevelopment of brownfield land;
- Are accessible by sustainable modes of transport and / or are in close proximity to existing visitor attractions;
- Offer the potential to improve access to rights of way, green infrastructure; and
- Support agricultural diversification of an appropriate scale and type in rural areas, and would support the continued viability of rural businesses.

Appendix XII



Inclusion on this map does not imply that any site is confirmed for allocation, and all sites will be subject to formal public consultation through the Local Plan process. It is only when the Local Plan is adopted that any site(s) would be formally allocated

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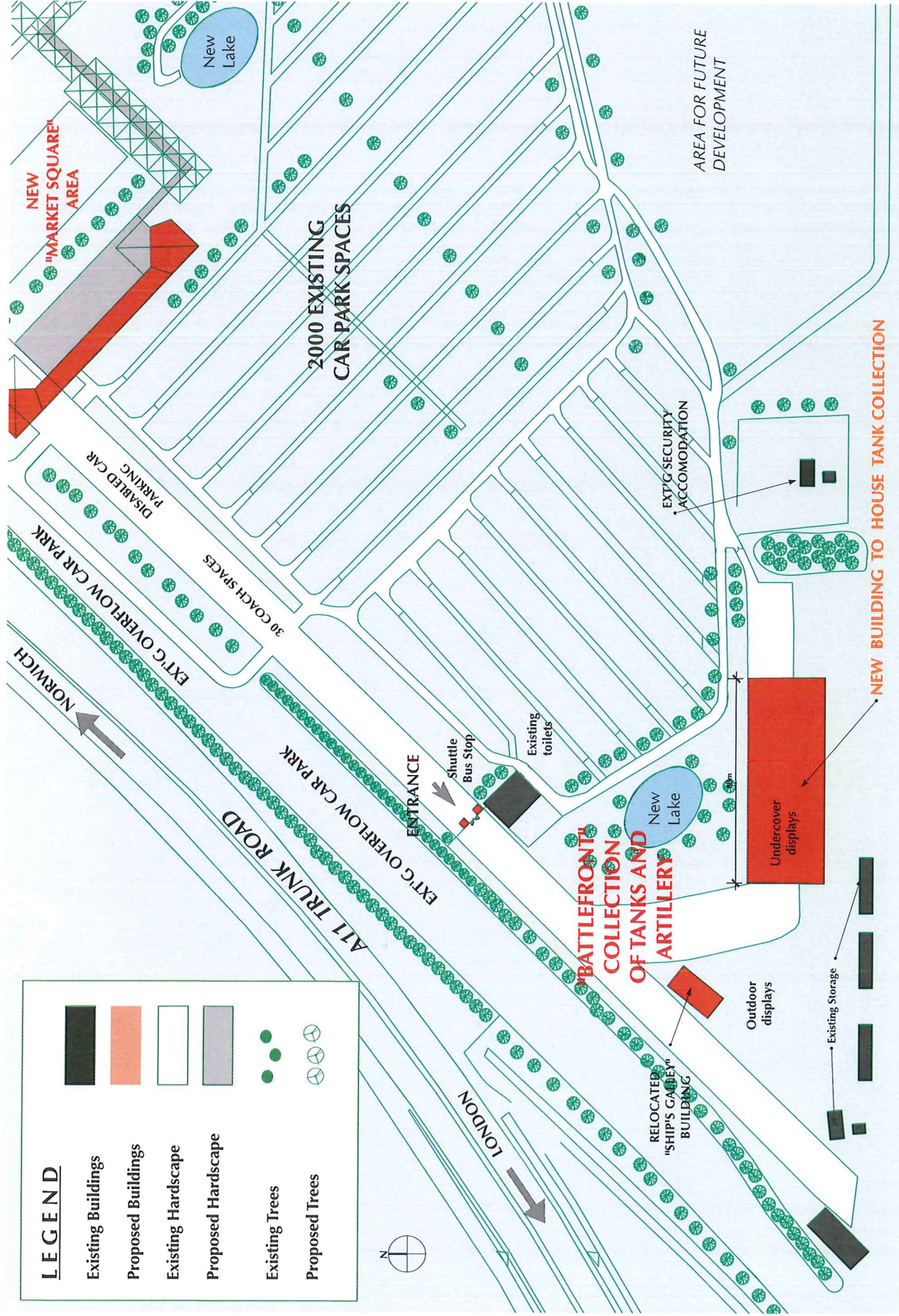
OWNER:
Cliffsky Limited

**SITE
DEVELOPMENT
DRAWINGS 2009**

DATE: 12 November 2009
REVISION:

SHEET #

PS3



SNETTERTON PARK SITE DEVELOPMENT PROPOSALS : Site Plan Detail 1:1000



Appendix XIII

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1,700 new jobs along A11 corridor to be created thanks to new £3.4m substation

Rebecca Murphy

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PUBLISHED: 08:00 13 March 2018 | **UPDATED:** 10:27 13 March 2018



Aerial view of Snetterton Park and Heath. Picture: Breckland Council

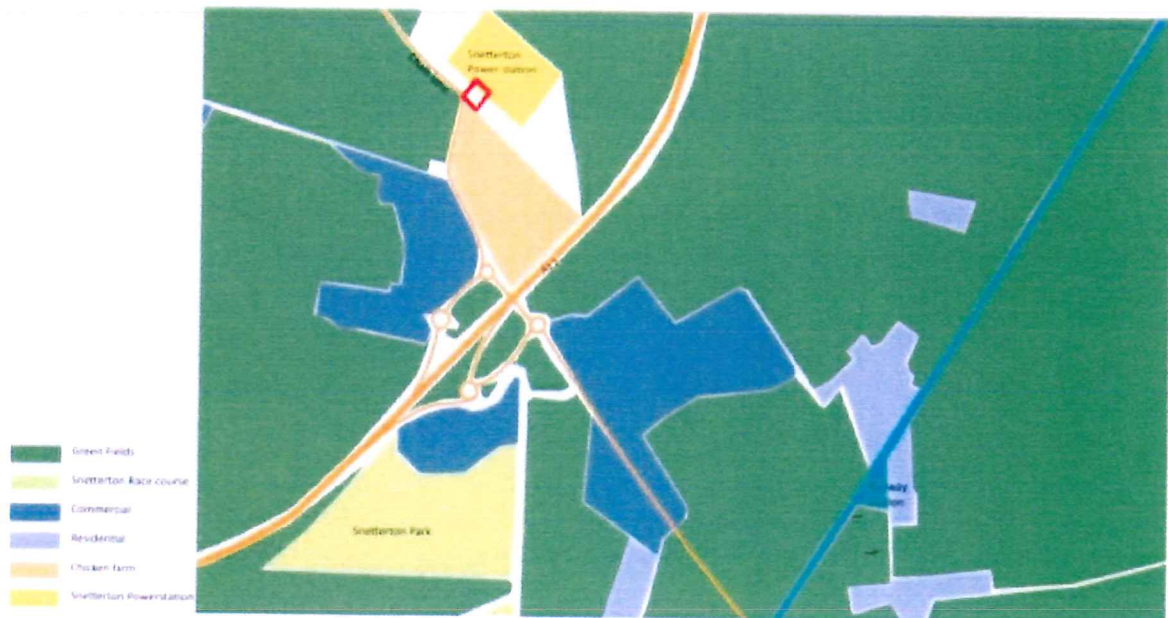
A new £3.4m electricity substation will breathe new life into a key employment zone hampered by a lack of power - creating 1,700 new jobs and saving 1,450 more.

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The location of the proposed substation. Picture: Chaplin Farrant

The 68.1 hectare site at Snetterton Heath, off the A11, has the potential to employ hundreds of people in the key Cambridge to Norwich Tech Corridor.

However a lack of power to the site has meant that its full potential has never been realised.

But that is now all set to change after Breckland Council's planning committee approved a bid to build a new £3.4m substation to solve the problem.

Due to be built adjacent to the Snetterton Renewable Energy Plant, it is hoped the substation will provide an additional six-mega-volt amps (MVA) to Snetterton Heath.



The Snetterton Renewable Energy Plant officially opens. Byline: Sonya Duncan Copyright: Archant 2017

This would be in addition to the site's existing 3MVA - which is currently at full capacity.

The additional power would be achieved by tapping into the high-voltage power line, which connects the plant to the major network power distribution point at Diss.

Long identified as a key employment site by Breckland Council and the New Anglia Local Enterprise Partnership (LEP), Snetterton Heath is seen as a strategic site within the Cambridge to Norwich A11 Tech corridor.

Chris Starkie, chief executive of New Anglia LEP, said: "Improving the power supply to Snetterton Heath will allow for existing businesses to expand and will attract new employers to the area.

"This will help towards the ambition in the Economic Strategy for Norfolk and Suffolk of creating 88,000 new jobs across the east by 2036.

"The strategy also identifies the Norwich to Cambridge A11 corridor as a priority place with significant potential for growth."

A further 20 hectares of land on the site is proposed for allocation and it has been estimated that the site has the capacity to deliver 200,000sqm of employment space.

Snetterton district councillor William Smith said: "With the power on site we hope this will generate general employment and highly skilled employment to the Snetterton area. It is something very much to be welcomed by both Breckland and the wider area."

A spokesman for Breckland Council said prior to the meeting: "We expect a funding bid for the project to be considered by the New Anglia Local Enterprise Partnership in the coming weeks and if this is secured we expect to begin work on implementing the project in summer this year."

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Appendix XIV

The Guardian



UK housebuilders to prefabricate hundreds of homes in factories

One company says it can build house in 20 days in factory, then erect it on site in hours

Robert Booth

Sun 31 Dec 2017 11.00 GMT

One of Britain's major housebuilders is to prefabricate up to a quarter of its homes in a factory, in the latest attempt by the construction industry to tackle the housing shortage.

Berkeley Homes, which builds 4,000 homes a year, is planning to create a facility in Kent next year where builders will work to produce up to 1,000 houses and apartments annually which will then be craned on to sites.

Another company, nHouse, is setting up a factory in Peterborough with the capacity to build 400 homes a year, complete with light fittings, bathrooms, bookshelves and kitchens. Production is expected to start in January.

It claims it can build a house in 20 days in the factory which can then be erected on site in half a day. Several other developers, including Legal and General and Urban Splash, have also launched prefab home divisions.

Fears of a shortage of skilled construction workers caused by an ageing workforce and an exodus due to Brexit are part of the reason for the revival of prefabrication, which last provided a significant number of homes after the second world war.

The government has set a target of building 300,000 homes a year by the middle of the next decade. Despite recent increases in activity, the last annual figure was 190,000.

A Berkeley spokesman said: "We have acquired a 10-acre brownfield site from the Homes and Communities Agency to build a factory for modular homes in Ebbsfleet, Kent. This will have the potential to deliver up to 1,000 homes a year.

"Construction of the factory could begin next year. While the speed of production and the impact on skills and labour are important factors, our real driver is the quality we can achieve with modular housing."

The nHouse has been designed by the architect Richard Hywel Evans and is made in four modules from engineered pine panels which are transported on the backs of lorries and are then clipped together on site and connected to pre-existing services. Its built-in features include solar panels, a robot vacuum cleaner and even a drone landing pad - looking forward to a time of aerial deliveries.

A three-bed house is on sale to developers or individual householders from £170,000 to £185,000, which is about the same price as a standard house built using wet trades.

Nick Fulford, the director of nHouse, argues that with 100 workers operating on an indoor production line rather than on muddy building sites in the elements, the homes will suffer from fewer snagging problems.

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