

Breckland Local Plan Examination

Matter 10:

Economic Development site allocations, deliverability and viability

Breckland District Council Hearing Statement

March 2018



Issues

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

1. All sites have been submitted through the local plan site selection process. An initial call for sites was carried out in 2013, followed by another call for sites along side the Issues and Options Consultation (November 2014 - January 2015). Sites were also submitted throughout the plan making process.
2. A total of 23 sites were submitted with the proposed use of Employment and were assessed on the basis of this proposed use. A further 20 sites were submitted for residential use, and a further 3 for retail, of which all were submitted with the alternative use of employment. These sites were initially assessed for the suitability of their proposed use. Sites which were determined to be unsuitable for their proposed use were then further assessed for their suitability as employment sites.
3. All sites put forward, those proposed for allocation and reasonable alternatives, have been subject to a robust sustainability appraisal assessment, as set out in Chapter 17 of the Sustainability Appraisal (LP/S/3), and have been published through various iterations of the local plan for public consultation.

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

4. The Site Selection topic paper (LP/H/4), although primarily focused on residential allocation site selection, provides a section on page 15 entitled 'Appraisal of options for employment'. This details the overarching methodology for the selection of employment sites. To provide further clarity, the Employment Sites Topic Paper, Appendix 1 of this statement, sets out a site specific methodology for each location where employment growth has been considered.

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

5. The Employment Site Topic Paper (Appendix 1) sets out the reasonable alternatives in each settlement and indicates why these were not appropriate for allocation. The topic paper illustrates that sites were assessed through the Sustainability Appraisal (LP/S/3) with further detailed site assessment being carried out through the Housing and Economic Land Availability Assessment (HELAA) (LP/H/8). The topic paper highlights that other factors were considered in regards to the selection of employment sites, such as saved policies, neighbourhood plan aspirations and wider strategic priorities. The topic paper provides robust evidence that the proposed allocations are the most appropriate options given the reasonable alternatives.

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

6. Three new employment sites are proposed for allocation through the local plan: Attleborough Employment Allocation 1, which proposes at least 10 hectares; Snetterton Employment Allocation 1, for at least 14 hectares; and Snetterton Employment Allocation 2, proposing at least 6 hectares of employment land.

7. Overarching infrastructure requirements are addressed through the Infrastructure Delivery Plan (LP/V/1). In regards to Snetterton and Attleborough the known constraints are around energy and foul water sewage.
8. The Infrastructure Delivery Plan (IDP) (LP/V/1) highlights known energy constraints regarding Snetterton Heath. The Council have played a proactive role in addressing these constraints. The IDP sets out that the Council have made a successful bid for £2.309 million to the New Anglia Local Economic Partnership (LEP)¹ that will support the funding of an energy capacity solution for the longer term needs of the site. On the 12th March 2018 the planning application for a substation at Snetterton Heath was approved at Breckland's Planning Committee². This new substation will be fed by a 40MW Biomass Plant, adjacent to the substation, which is now fully operational. The IDP also highlights that there are known issues around Foul Water Sewer flows regarding Snetterton Heath. However, there is a workable solution to this, which is to ensure that all developers liaise with Anglian Water to ensure they can make timely improvements in order to meet the additional demand. This illustrates that the Council are proactively seeking to ensure that the constraints regarding the sites can be overcome and that the sites are deliverable.
9. As part of the process to resolve the energy constraints at Snetterton Heath, the Council holds regular meetings with the landowners and interested parties through the Land Owners Consortium. As part of this process, one to one meetings with all of the landowners have been held to discuss each owner's specific aspirations regarding their land. During the Pre-Submission publication, the landowner of Snetterton Employment Allocation 1 made representations regarding Policy EC 02. Through this representation, the landowner highlighted support for development at Snetterton Heath and, importantly, support for the inclusion of their land within the local plan. No comments were made by the owners of Snetterton Employment Allocation 2, however support has been offered through the Land Owners Consortium. Both sites have been submitted as part of the local plan site selection process and have been supported through the Land Owners consortium.
10. The sites that form Attleborough Employment Allocation 1, LP[002]029 and LP[002]007, have been submitted through the local plan site selection process for employment use. The Neighbourhood Plan (LP/D/4), made on 18th January 2018, supports the allocation of a minimum of 10 hectares employment use on the site through Policy LE.P1³.
11. The Infrastructure Delivery Plan (LP/V/1) states that upgrades to the electricity network will be required in order to deliver the Attleborough Strategic Urban Extension, including the employment sites. The Council has held discussions with

¹ Paragraphs 4.9-4.15 (Pages 43-45) of the Infrastructure Delivery Plan (IDP) (LP/V/1)

² Breckland District Council (2017) 3PL/2018/0012/F [Online]
<http://planning.breckland.gov.uk/OcellaWeb/planningDetails?reference=3PL/2018/0012/F&from=planningSearch> [Accessed 14/03/2018]

³ Page 27 of the Attleborough Neighbourhood Plan (LP/D/4)

UKPN and Norfolk County Council to establish options to address the long term need for increased electricity supply, and proposals for a solution are being worked up which will be implemented on a program based approach. The study also highlights that Attleborough Wastewater Treatment Works (WwTW) have capacity for 1,800 dwellings and that beyond this new and improved treatment technologies would be required to ensure that water quality in the receiving river can continue to meet the require legislative needs. Anglian Water Services are currently undertaking a programme of treatment trials to test enhanced technology. The solutions to these trials can be achieved and will ensure that growth proposed for Attleborough is sustainable.

12. The Council consider the proposed allocations at Snetterton Heath and Attleborough are based on sound assessment of the infrastructure requirements and are considered to be deliverable with landowner support.

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

13. Chapter 5 of the Plan Wide Viability Assessment (LP/V/2) assesses the viability of non-residential uses within the district. The study provides an assessment of the markets for non-residential property, providing a basis for the assumptions around prices used in the financial appraisals for the sites. These assumptions then formed the basis of detailed modelling of non-residential uses, based on the following typical development types: Large Offices, Large Industrial and Distribution uses. Further assumptions are made regarding site coverage and density of development on the sites. The modelling looks at the viability of these types of development coming forward on both greenfield and brownfield sites.
14. The Plan Wide Viability Assessment concludes that although non-residential development is challenging in the current market, the cumulative impact of the Council's policies does not put employment uses at serious risk. The study sets out that the Council is, in line with Paragraph 174 of the NPPF, 'facilitating development through the economic cycle', through: Working closely with the LEP to secure infrastructure funding to support employment uses; recognising the importance of a well located and potentially flexible supply of employment land; working with the County Council to ensure that the infrastructure to support employment uses is given appropriate priority.
15. The following set out a few examples as to how the Council is facilitating development through the economic cycle in regards to employment land:
 - As of the 1st of February 2018 the Council has secured Housing Infrastructure Funding (HIF)⁴ for almost £10m from central government to help bring forward Thetford's Strategic Urban Extension (SUE). This would help bring forward employment land within the SUE and help to provide energy for Thetford Enterprise Park.

⁴ Breckland Council Website (2018) £10m investment in Greater Thetford will help 'meet the needs of a new generation' [Online] <https://www.breckland.gov.uk/article/7668/01-02-18-10m-investment-in-Greater-Thetford-will-help-meet-the-needs-of-a-new-generation-> [Accessed 13/02/2018]

- Thetford Enterprise Park funding – LEP and BRP On the 21st of June 2016 the New Anglia LEP approved the redirection of existing approved funding of £.198m from the original Thetford Sustainable Transport Package (Local Growth Funding) to prioritise the construction of a new access roundabout for the Thetford Enterprise park⁵. On the 19th of January 2017 the Council accepted £450k of Norfolk Business Rates Pool funding for the purpose of commencing the Thetford Enterprise Park Access Roundabout⁶.
- On the 19th of January 2017 the Council accepted a £2.3m grant from the New Anglia LEP in order to contract a major electricity power upgrade project benefitting the key Snetterton employment area⁷.

16. Policy EC 01 has been assessed through the Plan Wide Viability Assessment and, as such, is based on a sound understanding of financial viability.

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

17. The Issues and Options Consultation (LP/S/06) asked the question of each of the market towns and Snetterton Heath regarding the strategy of retaining existing General Employment Areas (GEA): 'Do you consider the Council's preferred approach to retain the existing employment areas within... remains appropriate?'. At this early stage in the plan making process, no issues were highlighted regarding the suitability of the GEAs.

18. The defined GEAs and additional employment sites put forward through the site selection process were set out in the Preferred Sites consultation (LP/S/11). Snetterton GEA and additional sites were set out again in the Preferred Site Options and Settlement Boundaries consultation (LP/S/12). During both the Preferred Sites Consultation and the Preferred Sites and Settlement Boundaries no representations were made regarding the suitability of General Employment Areas and their boundaries.

19. Through the Preferred Site Options and Settlement Boundaries consultation (LP/S/12) a change was proposed to the General Employment Area. A closed landfill site under the care of Norfolk County had previously been included within the GEA boundary. In July 2015 an application (C/3/2015/3012)⁸ was made for an Environmental Impact Assessment screening opinion request for the erection of ground mounted solar panels on the site. This substantiated that the site would not

⁵ New Anglia (2018) Thetford Transport Package [Online] <https://newanglia.co.uk/project/thetford-transport-package/> [Accessed 15/03/2018]

⁶ Breckland Council Website (2017) Thetford TEP Access Roundabout Funding [Online] <http://democracy.breckland.gov.uk/documents/s41418/170112%20Council%20Report%20Thetford%20TEP%20Access%20Roundabout%20Funding%20v1.1%20FINAL.pdf> [Accessed 15/03/2018]

⁷ Breckland Council Website (2017) Snetterton Electricity Power Upgrade Project [Online] <http://democracy.breckland.gov.uk/documents/s41384/170109%20Council%20Report%20Snetterton%20Electricity%20Power%20Upgrade%20Project%20v1.1.pdf> [Accessed 15/03/2018]

⁸ Norfolk County Council [Online] <http://eplanning.norfolk.gov.uk/PlanAppDisp.aspx?AppNo=C/3/2015/3012> [Accessed 16/02/2018]

come forward for an employment use (B1, B2 and B8) and should be removed from the GEA. To ensure that the available land on the GEA remained the same it was proposed to remove this area of landfill from the GEA (SNE.01) and include an area of land that is adjacent to the GEA and reflects existing uses on the site (SNE.02)⁹.

20. Table 5.2 of the Employment Growth Study 2013 (LP/ER/1) assessed the suitability of all General Employment areas within the district. The study assessed the sites based on the following criteria: Strategic and local road access; proximity to labour and service; adjoining uses that might constrain employment uses; site size, characteristics and potential development constrains; and market attractiveness. Of the 36 sites assessed through the study, 30 were considered to be good / average quality when assessed against the criteria.

21. The local plan approach to General Employment Areas has been informed by the Employment Growth Study (2013), which assessed all employment sites within the district. Through further public consultation and engagement with landowners and business, the Council considers that the General Employment Areas and their boundaries remain suitable and based on robust evidence.

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

22. Any development proposal will need to comply with Policies ENV 07 Designated Heritage Assets and ENV 08 Non-Designated Heritage Assets. These policies set out requirements with regard to archaeological assessments and further information required to be submitted to support proposals which are likely to impact on designated and non-designated heritage assets, therefore complying with national policy.

23. However, to aid the formulation of a development proposal for the site, and to provide clarity in the policy of the need to consider the adjacent heritage assets, it is recommended that the Inspector considers the following modification to the supporting text and to the policy wording:

Attleborough Allocation, add a further paragraph to the supporting text:

6.19 The Grade II White Lodge Inn sits immediately to the east of this site. It is a low rise building which sits in open land. A further collection of Grade II listed buildings are located further to the east of the site, Potmere Farmhouse and associated barns. Consideration should be given to the wider setting of these heritage assets in forming development proposals as well as the potential for archaeological interest on the site.

⁹ Figure 27.1 (Page 173) Preferred Site Options and Settlement Boundaries (LP/S/12)

Policy Attleborough Employment Allocation 1, add a further policy requirement following clause 3:

4. Development proposals will be informed by the presence of designated and non-designated heritage assets and their settings. The scheme design will seek to conserve and, where possible, enhance the setting of heritage assets.

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

24. A modification is proposed to ensure that the policy wording in Attleborough Employment Allocation 1 refers to 'at least' 10 hectares.

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

25. Snetterton Employment Allocation 1 is situated over 500m to the nearest designated heritage asset. The land elevation between the proposed allocation and the heritage assets is such that it provides adequate screening. Snetterton Allocation 2 is more than 1.5km to the nearest designated asset and is over 900m from the Scheduled Ancient Monument.

26. Policy ENV 07 Designated Heritage Assets and Policy ENV 08 Non-Designated Heritage Assets would provide further protection of the historic environment. Furthermore, both policies as proposed through Matter 15 'Historic Environment' set out a requirement for an archaeological field evaluation where appropriate.

27. As a result of the distance of the sites from the historic environment and the policies relating to the historic environment in the plan itself, it is considered that Snetterton Employment Allocations 1 & 2 do not need to refer to the historic environment.

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 Eco-Tech 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?

28. Through the Issues and Options Consultation (LP/S/6) the question was asked "Do you consider the existing employment areas remain appropriate? Is there any other information you consider we should be aware of to inform future employment growth decision in ...?" This question related to Saved Policies D5, SW2, SW3 and TH30. At this early stage in the plan making process, no representations were made that questioned the deliverability of the sites.

29. It is acknowledged that Saved Policy D5 (Land East of Dereham Business Park) has known constraints around access. The Council has been proactive in seeking to

achieve solutions to this constraint and bring the site forward. The Council has regular meetings with the land owner and are confident of landowner support. It is acknowledged that access constraints have slowed delivery of the site, but the Council can demonstrate that it has been taking a proactive role and that the site is deliverable.

30. Land that forms part of SW3 was submitted through the local plan site selection process for residential and employment use. Through the site assessment process, it was determined that the site was not suitable for residential development due to the proximity to the existing General Employment Area and objections made by Norfolk County Council Highways. A written representation was made during the Pre-Submission consultation (comment 373, page 1034, LP/S/25) by the DeMerke Estate, the landowners of the site known as 'Saved Policy SW2 (Land to the north of the Eco-Tech Centre)'. This stated that "Saved policy SW2 is supported in as much as the land to the north of the eco-tech centre is an appropriate location for employment development to meet identified needs". This illustrates that the landowner is supportive of the site's continued allocation as employment use.
31. Land that forms part of SW3 was submitted through the local plan site selection process for residential and employment use. Through the site selection process it was determined that the site was not suitable for residential development due to the proximity to the existing General Employment Area and objections made by Norfolk County Council Highways. As the site was put forward for an alternative use as employment, this shows landowner support for the site's continued allocation as employment land.
32. Criteria c of Saved Policy SW2 states that "Development will not commence until vacant, developable land in the existing Eco-Tech centre has been developed" and criteria f of Saved Policy SW3 states that "Development will not commence until the land allocated by policy Se2 has been implemented". The criteria set out in these policies are considered to be the reason as to why they have not been developed over the past 5 years. However, it is considered that criteria c of saved policy will soon be met. According to the Norfolk County Council Employment Monitoring Report 2017¹⁰ there are 10.1 hectares of land available in Swaffham, with 0.6 hectares having planning permission. The allocations SW2 and SW3 account for 8.8 hectares, leaving 0.7 hectares of developable land. With only 0.7 hectares of developable land supply remaining in Swaffham, clause c of Saved Policy SW2 will soon be met. The Council considers that, in light of this evidence, both sites are deliverable.
33. Saved Policy TH30 (New Employment Land) forms part of the Thetford Strategic Urban Extension and was developed through the Thetford Area Action Plan. The site is situated within the A11 Corridor and remains a key strategic priority of the Council. The A11 was dualled in 2014 and following this the A11 Technology Corridor

¹⁰ Norfolk County Council (2017) Employment Land Monitoring Report [Online]
<file:///C:/Users/james.mann/Downloads/Employment%20Land%20Monitoring%20Report%202017.pdf>
[Accessed 13/02/2018]

Partnership was set up, which included Suffolk and Norfolk County Councils, Norwich City Council and the New Anglia LEP. This was then expanded to become the Cambridge Norwich Technology Corridor and brought East Cambridgeshire Council, the Greater Cambridge Greater Peterborough LEP and Norwich City Council on board as partners. On the 8th November 2016, Liz Truss, Secretary of State for Justice and Lord Chancellor, hosted the official launch of the Cambridge Norwich Tech Corridor, a 15 year vision to create £558m in economic growth at key locations along the A11 between Cambridge and Norwich. Breckland Council, as a founding member of the CNTC has does much to advance the delivery of the site.

34. As of the 1st of February 2018 the Council has secured Housing Infrastructure Funding (HIF)¹¹ for almost £10m from central government to help bring forward Thetford's Strategic Urban Extension (SUE). This includes provision for improving the sites water and electricity supply. Although this funding is to aid the delivery of housing, saved employment land, TH30, which is situated within the SUE will also benefit from the HIF. The HIF bid was supported by the Kilverstone Estate, the landowners of the site. Further to this, the Council have produced a Statement of Common Ground with the developer, Pigeon, of the Thetford Strategic Urban Extension, which highlights the deliverability of the site, including the employment land that makes up Saved Policy TH30.

35. Saved Policies D5, SW2, SW3 and TH30 should be considered as saved policies as the Site Specific Policies & Proposals DPD and Thetford Area Action Plan were both subject to successful examination. It is acknowledged that criteria in policies SW2 and SW3 could be restrictive to the delivery of the employment sites, if it is considered necessary to delete the criteria in order to strengthen the delivery of these sites then they could be considered as new allocations. No objections were raised through the Local Plan consultation process and the Council considers the sites to be deliverable and developable and is taking proactive steps in order to ensure that the sites come forward.

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?

36. A modification is proposed to update Map 6.3 of the plan in order to provide consistency with the Swaffham Policies Map.

¹¹ Breckland Council Website (2018) £10m investment in Greater Thetford will help 'meet the needs of a new generation' [Online] <https://www.breckland.gov.uk/article/7668/01-02-18-10m-investment-in-Greater-Thetford-will-help-meet-the-needs-of-a-new-generation-> [Accessed 13/02/2018]

Appendix 1: Employment Sites



Breckland Local Plan:
Employment Sites

February 2018

Employment Sites

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Employment Sites

1. Introduction

1.1. The purpose of this topic paper is to set out the approach towards site selection of employment sites. The methodological approach is set out in the Site Selection Topic paper, this paper seeks to embellish this by setting out how employment sites were chosen and why other sites were not chosen in each area.

2. Local Development Framework

2.1. The Core Strategy and Development Control Policies Development Plan Document (LP/D/1) through Policy CP 3 proposed the following:

- At least 30-40ha of strategic employment land at Thetford;
- at least 20ha at Snetterton;
- at least 10ha at Attleborough;
- at least 5-10ha at Dereham;
- at least 5ha at Swaffham.

2.2. Through the Thetford Area Action Plan(LP/D/3) land amounting to at least 22ha was allocated for employment development as part of the sustainable urban extension.

2.3. Through the Adopted Site Specific Policies and Proposals Development Plan Document (LP/D/2) the following sites were allocated for employment land:

- Policy SW2: 3ha at Swaffham;
- Policy SW3: 5.8ha at Swaffham;
- Policy D5: 3.1ha at Dereham.

2.4. The Attleborough and Snetterton Area Action Plan was suspended to allow for the progression of the new, single local plan.

3. The Employment Growth Study

3.1. The Breckland Employment Growth Study 2013 (LP/ER/1) sets out four different scenarios of future employment space requirements. These four scenarios are set out in Figure 1.

Employment Sites

Figure 1: Gross Land Requirement by Scenario to 2031 (ha)

Use	1. Job Growth (Baseline)	2. Job Growth ('Policy-On')	3. Past Take-up	4. Labour Supply (699 dw.p.a)
Industrial (B1c/B2/B8)	25.3	37.5	65.9	31.8
Offices (B1a/b)	6.3	6.5	8.8	2.2
All B uses	31.6	44.0	74.7	34.0

Source: NLP analysis

3.2. The scenarios set out a range of employment space requirements from 31.6 hectares to 74.7 hectares.

3.3. An update to the study was produced in 2017 (LP/ER/5) that sets out three scenarios. These are shown in Figure 2.

Figure 2: Gross Land Requirement by Scenario to 2036 (ha)

Use	1. Job Growth (Baseline)	2. Past Take-up	3. Labour Supply
Office (B1a/B1b)	7.0	9.8	6.3
Manufacturing (B2)	-13.0	33.0	-15.5
Distribution (B8)	2.1	46.7	0.3
All B uses	-3.9	89.4	-8.9

3.4. These scenarios consider the most up to date modelling information and address the entire plan period, 2011-2036. The scenarios set out a range of employment space requirements from -8.9ha to 89.4 hectares.

3.5. The scenario which shows the highest level of gross land requirement in both the 2013 study and 2017 update is the 'Past Take-up' scenario. This scenario provides a gross land requirement going forward based on what has been being developed in the District. The Employment Growth Study looks at completions between 2004/5 and 2011/2, while the Employment Growth Study Update looks at completions between 2004/5 and 2016/7.

3.6. The pipeline supply, i.e. extant planning permissions and saved allocations (set out in section 1), is shown to meet the demand in each scenario in both the 2013 study and the 2017 update.

Employment Sites

4. Cambridge Norwich Technology Corridor

- 4.1. In 2014, the completion of the dualling of the A11, between the junction with the M11 and Norwich, signalled an opportunity to explore the creation of an A11 technology corridor, with the aim of securing substantial economic growth and a need to align employment growth with the significant increase in housing accommodation within the A11 Corridor to meet the needs of predicted population growth. In 2015 Breckland Council along with South Norfolk and Forest Heath funded a comprehensive study of sites within the A11 corridor, the A11 Growth Corridor – Feasibility Study (LP/V/8). On the back of this study the A11 Technology Corridor Partnership was set up which included Suffolk and Norfolk County Councils, Norwich City Council and the New Anglia LEP.
- 4.2. Following discussions with Cambridgeshire based authorities this has led to a desirable extending of the corridor so that It may now be considered as the Cambridge Norwich Tech Corridor (CNTC). This has brought East Cambridgeshire Council, the Greater Cambridge Greater Peterborough LEP and Norwich City Council on board as partners. On the 8th November 2016, Liz Truss, Secretary of State for Justice and Lord Chancellor, hosted the official launch of the Cambridge Norwich Tech Corridor, a 15 year vision to create £558m in economic growth at key locations along the A11 between Cambridge and Norwich. Breckland Council, as a founding member of the CNTC, commissioned a further study entitled the Economic Growth Potential of the Cambridge Norwich Technology Corridor (LP/V/()), which set out an analysis of sectoral growth potential of the CNTC.
- 4.3. The A11 Growth Corridor Feasibility Study (LP/V/8) identifies the following as ‘key site locations’ along the A11 Corridor:
 - Attleborough
 - Snetterton Heath
 - Thetford SUE

Employment Sites

5. The local Plan

5.1. The Preferred Directions consultation version of the Local Plan set out that the plan was seeking to deliver 67 hectares of employment land over the plan period. This figure is in line with the Council's Strategic Objectives, which underpin the Strategic Vision, which seek to:

- Promote and support economic growth in sustainable and accessible locations in a flexible manner, diversifying the urban and rural economic base of the District;
- enable and full potential of the A11 gateway and A47 corridor to contribute to economic growth of the District;
- develop the local economy and meet local employment needs by providing a sufficient number and variety of employment locations and opportunities.

5.2. In line with the Council's Vision and Objectives, the Preferred Directions consultation proposed the following distribution of employment land:

- Attleborough – at least 10Ha
- Dereham - at least 6Ha (consisting of the specific allocations identified in the Sites Specific Policies and Proposals DPD - Policies D4 and D5 – which have been identified as saved policies 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

5.3. Feedback during the consultation indicated broad support for the approach.

However, following the Preferred Directions consultation a residential application was submitted on a saved employment allocation, site D4 in the Site Specific Policies and Proposals DPD (2012), which was refused but overturned at appeal. All sites put forward for employment use were assessed in Dereham, but, as shown in section 5 of this document, no suitable alternative sites were identified in Dereham.

Employment Sites

5.4. Due to the late stage of the plan making process and the lack of suitable alternatives the figure for Dereham was reduced to at least 3ha over the plan period. Having regard to the 2013 Employment Growth Study (LP/ER/2013) and 2017 Employment Growth Study Update (LP/ER/05), It was considered that the overall quantum of 64ha was sufficient to provide a wide range of employment opportunities across the district.

6. Site Specific Decision Making

5.1. The approach to site selection regarding employment land was set out the Site Selection Topic Paper (LP/H/4). All sites put forward for employment use have been assessed through chapter 17 of the Sustainability Appraisal (LP/S/3) and site assessment through the Housing and Economic Land Availability Assessment (HELAA) (LP/H/8). Whilst the Site selection topic paper provides a general overview of the selection process, this chapter sets out the range of sites considered and the unique characteristics of each site assessed within the market towns and Snetterton. The tables set out unreasonable and all reasonable alternatives submitted through the local plan process and the reasons that these were not selected for allocation.

5.2. Key factors regarding the selection of sites included, but have not been limited to:

- Distance from employment area/settlement;
- Norfolk County Council Highways comments;
- landscape impacts; and
- the historic and natural environment.

Employment Sites

Attleborough

- 5.3. All sites have been assessed through the Sustainability Appraisal (LP/S/3), the Attleborough section can be found on pages 486-490. Sites LP[002]029 and LP[002]007 amounting to approximately 10 hectares of employment land are proposed for allocation through the Submission version of the Local Plan.
- 5.4. The site selection process was furthered by discussions between the Council and Attleborough Town Council during the formation of the Attleborough Neighbourhood Plan. Policy LE P1¹ and the Attleborough Neighbourhood Plan policies map 1, supports employment development with access from London Road. The plan was made on the 18th January 2018.
- 5.5. Table 1 sets out the proposed allocation sites through the Local Plan, which are supported by the adopted Attleborough Neighbourhood Plan.

Table 1: Attleborough Proposed Allocations

Reference #	Site Size (hectares)	Assessment
Attleborough Employment Allocation 1 (LP[002]029 & LP[002]007)	12.5 (gross) 10 (net)	The proposed sites both scored neutrally in the Sustainability Appraisal, scoring positively against criteria around economic activity. The site has frontage along the A11 and would represent a key gateway into Attleborough from London Road. The proposed allocation seeks to benefit from the future development of the link road as part of the Attleborough SUE.

- 5.6. Table 2 sets out all of the sites that were submitted in Attleborough for a preferred or alternative use as employment land. This indicates that there are a number of suitable sites in Attleborough.

Table 2: Attleborough alternative sites

Reference #	Site size (hectares)	Preferred Use	Alternative Use	Assessment
LP[002]002	64.1	Employment		Unreasonable due to the lack of suitable highway network and distance from the settlement.
LP[002]021	2	Employment		The site has been submitted as a land representation for employment land and through assessment is considered that the site is suitable and available for employment use. However, the choice of employment allocation was selected in partnership with Attleborough Town Council

¹ Attleborough Neighbourhood Plan (2017)

https://www.attleboroughtc.org.uk/images/Submission_1.pdf

Employment Sites

				in developing the neighbourhood plan. This site is not required to meet the need.
LP[002]022	4	Employment		The site has been submitted as a land representation for employment land and through assessment is considered that the site is suitable and available for employment use. However, the choice of employment allocation was selected in partnership with Attleborough Town Council in developing the neighbourhood plan. This site is not required to meet the need.
LP[002]026	1.2	Employment		The site has been submitted as a land representation for employment land and through assessment is considered that the site is suitable and available for employment use. However, the choice of employment allocation was selected in partnership with Attleborough Town Council in developing the neighbourhood plan. This site is not required to meet the need.
LP[002]033	5.2	Employment		The site has been submitted as a land representation for employment land and through assessment is considered that the site is suitable and available for employment use. However, the choice of employment allocation was selected in partnership with Attleborough Town Council in developing the neighbourhood plan. This site is not required to meet the need.
LP[002]035	4.8	Employment		The site has been submitted as a land representation for employment land and through assessment is considered that the site is suitable and available for employment use. However, the choice of employment allocation was selected in partnership with Attleborough Town Council in developing the neighbourhood plan. This site is not required to meet the need.
LP[008]003	17.9	Employment		Unreasonable – Highways constraints, flooding issues, distant from the settlement.
LP[002]006	6.3	Residential	Employment	The site has been submitted as a land representation for employment land and through assessment is considered that the site is suitable and available for employment use. However, the choice of employment allocation was selected in partnership with Attleborough Town Council in developing the neighbourhood plan. This site is not required to meet the need.
LP[002]020	6.4	Residential	Employment	Unreasonable - Distant from the settlement.
LP[002]023	3.5	Retail	Employment	Unreasonable - Distant from the settlement.
LP[002]025	0.8		Employment	The site has been submitted as a land representation for employment land and through assessment is considered that the site is suitable and available for employment use. However, the choice of employment allocation was selected in partnership with Attleborough Town Council in developing the neighbourhood plan. This site is not required to meet the need.

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LP[002]027	6.7		Employment	The site has been submitted as a land representation for employment land and through assessment is considered that the site is suitable and available for employment use. However, the choice of employment allocation was selected in partnership with Attleborough Town Council in developing the neighbourhood plan. This site is not required to meet the need.
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Dereham

5.7. All sites have been assessed through the Sustainability Appraisal (LP/S/3), the Dereham section can be found on pages 491-493. Saved Policy – Policy D5 amounting to 3.1 hectares of employment land is proposed as a saved allocation through the Submission version of the Local Plan. A summary of the assessment of this site is set out in Table 3.

Table 3: Dereham Proposed Allocation

Reference #	Site Size (hectares)	Assessment
Saved Policy – Policy D5	3.1	<p>The site is a saved allocation from the Site Specific Policies and proposals DPD (LP/D/2) and represents an extension to Dereham Business Park.</p> <p>The site scores positively in the Sustainability Appraisal (LP/S/3) against criteria around economic activity and climate change.</p> <p>The site is well located to services and facilities and would have good access to the A47.</p>

5.8. During the plan making process a number of sites were submitted for employment use either as a ‘preferred’ or ‘alternative’ use. However, no suitable sites were identified through the site selection process. Table 4 sets out all of the sites that were submitted in Dereham for a preferred or alternative use as employment land.

Table 4: Dereham Alternative Sites

Reference #	Site size (hectares)	Preferred Use	Alternative Use	Assessment
LP[025]002	0.26	Residential	Employment	Site has planning permission for two 3-bed houses 3PL/2014/0576/F
LP[025]006	0.55	Residential	Employment	Site has planning permission for 9 dwellings 3PL/2016/0540/D
LP[025]010	19.37	Residential	Employment	Site scores neutrally against the SA criteria however NCC highways have raised concerns regarding the site:

Employment Sites

				<p><i>“This is not a location where we would be encourage development. There appears little or no opportunity to provide appropriate pedestrian and cycle connections to the existing provision on Mattishall Road / Norwich Road. Furthermore, whilst there would be potential to improve Mattishall Road along the site frontage there is little ability to improve the remainder of Mattishall Road / Stone Road to a suitable standard.”</i></p>
LP[025]024	4.25	Residential	Employment	<p>The site was identified as a reasonable alternative within the Local Plan for residential development. During public consultation a number of issues were raised regarding the suitability of the area for residential development.</p> <p>Due to the proximity of the residential area to the west of the site this would reduce the options for employment opportunities on the site itself.</p> <p>Furthermore, there are constraints in regards to residential access to the site from Walpole Loke.</p>
LP[025]031	19.37	Employment		<p>Site scores neutrally against the SA criteria however NCC highways have raised concerns regarding the site:</p> <p><i>“This is not a location where we would be encourage development. There appears little or no opportunity to provide appropriate pedestrian and cycle connections to the existing provision on Mattishall Road / Norwich Road. Furthermore, whilst there would be potential to improve Mattishall Road along the site frontage there is little ability to improve the remainder of Mattishall Road / Stone Road to a suitable standard.”</i></p>
LP[025]032	7.15ha	Employment		<p>Site scores neutrally against the SA criteria however NCC highways have raised concerns regarding the site:</p> <p><i>“This is not a location where we would be encourage development. There appears little or no opportunity to provide appropriate pedestrian and cycle connections to the existing provision on Mattishall Road / Norwich Road. Furthermore, whilst there would be potential to improve Mattishall Road along the site frontage there is little ability to improve the remainder of Mattishall Road / Stone Road to a suitable standard.”</i></p>

Employment Sites

Snetterton

1.1. All sites have been assessed through the Sustainability Appraisal (LP/S/3), the Snetterton section can be found on pages 493-502. The proposed allocations set out in the Draft Local Plan seek to allocate the following two sites: LP[087]010A and LP[087]009. These allocations amount to 20 hectares of net employment land. These allocations are also supported by policy EC 02 in the draft version of the Local Plan.

Table 7: Snetterton Proposed Allocations

Reference #	Site Size (hectares)	Assessment
Snetterton Employment Allocation 1 (LP[087]010A)	3.1	<p>The site provides an extension to Snetterton Heath North General Employment Area with good access to the A11.</p> <p>The site scores positively in the Sustainability Appraisal (LP/S/3) against criteria around economic activity and climate change.</p>
Snetterton Employment Allocation 2 (LP[087]009)	6	<p>The site provides an extension to Snetterton Heath North General Employment Area. The site has access to the GEA and the A11 and also has frontage along the A11.</p> <p>The site scores positively in the Sustainability Appraisal (LP/S/3) against criteria around economic activity and climate change.</p>

1.2. Whilst there are a number of reasonable alternatives in Snetterton the site selection process was informed by, not only the sustainability appraisal, but also through ongoing discussions with the Snetterton Landowners Forum.

1.3. The Landowners Forum is a consortium of the major landowners, engaged specifically in relation to the Electricity Upgrade Project². As part of these consultations one to one discussions with the Council focused around each owner's aspirations for their employment land development. This level of engagement was required for the Electricity Upgrade Project so that potential power requirements could be estimated in each part of the existing General Employment Area and the proposed additional allocations.

1.4. Table 8 sets out all of the sites that were submitted in Snetterton for a 'preferred' or 'alternative' use as employment.

² Paragraphs 4.9-4.15 (Pages 43-45) of the Infrastructure Delivery Plan (IDP) (LP/V/1)

Employment Sites

Table 8: Snetterton Alternative Sites

Reference #	Site Size (hectares)	Preferred Use	Alternative Use	Assessment
LP[087]002	4.5	Employment		The site scores negatively against the SA criteria. NCC highways have also raised concerns regarding the site: <i>“Not suitable for allocation. No clear means of access other than directly from the A47.”</i>
LP[087]003	4.5	Employment		The site scores neutrally in the SA. The site was identified as a reasonable alternative through the Preferred Sites and Settlement Boundaries consultation.
LP[087]005	22.27	Employment		The site scores neutrally in the SA. The site was identified as a reasonable alternative through the Preferred Sites and Settlement Boundaries consultation. Development of the site would be dependent upon site LP[087]010A coming forward.
LP[087]006	6.75	Employment		The site scores neutrally in the SA. The site was identified as a reasonable alternative through the Preferred Sites and Settlement Boundaries consultation.
LP[087]008	2.25	Employment		The site scores negatively against the SA criteria. The site is distant from the General Employment Area.
LP[087]011	26.7	Employment		The site scores neutrally in the SA. The site was identified as a reasonable alternative through the Preferred Sites and Settlement Boundaries consultation.
LP[087]001	0.1	Residential	Employment	The site scores negatively against the SA criteria. The site is distant from the General Employment Area. NCC highways have also raised concerns regarding the site: <i>“Not suitable for allocation. Unsustainable location. Inadequate road network. The Highway Authority would object to this site in being in the local plan”</i>
LP[087]007	0.76	Residential	Employment	The site scores negatively against the SA criteria. The site is distant from the General Employment Area. NCC highways have also raised concerns regarding the site: <i>“Not suitable for allocation. Remote from the settlement.”</i>
LP[077]001	8.3	Employment		The site scores negatively against the SA criteria. The site is distant from the General Employment Area.
LP[077]003	8.2	Employment		The site scores neutrally in the SA. The site was identified as a reasonable alternative through the Preferred Sites and Settlement Boundaries consultation.

Employment Sites

6.9. All sites have been assessed through the Sustainability Appraisal (LP/S/3), the Snetterton section can be found on pages 502-503. Saved Policy – Policy SW2 amounting to 3 hectares of employment land and Saved Policy – Policy SW3 amounting to 5.8 hectares are proposed as a saved allocations through the Submission version of the Local Plan. A summary of the assessment of these sites is set out in Table 5.

Table 5: Swaffham proposed allocations

Reference #	Site Size (hectares)	Assessment
Saved Policy – Policy SW2	3.1	<p>The site is a saved allocation from the Site Specific Policies and proposals DPD (LP/D/2) and represents an extension to the Eco-Tech Centre.</p> <p>The site scores positively in the Sustainability Appraisal (LP/S/3) against criteria around economic activity and climate change.</p> <p>The site is well located to services and facilities and would have good access to the A47.</p>
Saved Policy – Policy SW3	5.8	<p>The site is a saved allocation from the Site Specific Policies and proposals DPD (LP/D/2) and represents an extension to the Eco-Tech Centre.</p> <p>The site scores positively in the Sustainability Appraisal (LP/S/3) against criteria around economic activity and climate change.</p> <p>The site is well located to services and facilities and would have good access to the A47.</p>

6.10. During the site selection process only one site was submitted with an alternative use for employment land. The site itself is a current allocation through the Site Specific Policies & Proposals DPD (2012). This site represents a saved allocation through the Draft version of the Local Plan, and, as such, is already a proposed employment allocation.

6.11. During the site selection process only one site was submitted with the preferred use being residential and an alternative use for employment land. The site is allocated for employment through the Site Specific Policies & Proposals DPD (2012). The site was determined to be unsuitable for residential use and was then assessed for employment use. The site is considered suitable, available and deliverable through assessment of Saved Policy – SW3, as highlighted in Table 5.

6.12. Table 6 sets out all of the sites that were submitted in Swaffham for a preferred or alternative use as employment land.

Table 6: Swaffham Alternative Sites

Reference #	Site Size	Preferred	Alternative	Assessment
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Employment Sites

	(hectares)	Use	Use	
LP[097]001	12.8	Residential	Employment	The site was considered to be unsuitable for residential development due to 'severe' highways constraints. The site includes SW3, which is a saved employment site. It is considered that the site is unreasonable for residential allocation within the Local Plan, but shows the intention of the landowner to provide more employment land in the future if required.

Thetford

6.13. No sites were submitted for proposed employment either as a preferred use, or an alternative use during the development of the local plan. The draft Local Plan seeks to save policy TH30 from the Thetford Area Action Plan in order to bring forward at least 22 hectares of employment land. This site forms part of the wider allocation of Thetford SUE which was granted outline planning permission in December 2015.

Watton

6.14. It is not proposed to allocate further employment land at Watton through the Local Plan. The Employment Growth Study (LP/ER/01) and Employment Growth Study Update (LP/ER/05) both indicate that the supply demand balance at Watton is well matched and does not propose that further land is required. Additionally, no sites were submitted for proposed employment through the site selection process.

7. Conclusion

6.1. Whilst the Site Selection Topic paper set out the overarching site selection process, this topic paper has sought to demonstrate how employment allocations were assessed in each settlement