

Breckland Local Plan Examination

Matter 9: Economic Development

&

Matter 10: Economic development site allocations, deliverability and viability

Breckland District Council

Inspector's Questions on the Additional Work and related Proposed Modifications

August 2018



General Employment Areas (GEAs)

1.33 Is the methodology that was used in the topic paper to re-asses the boundaries of the GEAs justified?

1. The methodology is set out in paragraphs 1.11 to 1.13 of the General Employment Area topic paper to re-assess the boundaries of the GEAs. The methodology sets out that planning permissions for each GEA have been mapped in order to analyse the uses of these permissions.
2. The methodology details that changes to the GEA boundaries are proposed in the following circumstances:
 - I. Where a retail planning permission has been granted on the site and implemented, it is proposed to remove these from the extent of the GEA unless the permission is small in scale and/or would not impact upon the functionality of the employment area.
 - II. Where a residential permission has been granted on the site and implemented, it is proposed to remove these from the GEA.
3. This methodology has been applied to all GEAs within the district and an assessment has been made of each site. The assessment analyses planning permissions and provides reasoned justification where a GEA boundary change is proposed or is remaining unchanged. This detailed, site specific approach in line with the methodology is considered to be robust and justified.

1.34 Is the review of each GEA boundary and its findings robust?

4. The review of each GEA boundary follows the methodology as set out in the General Employment Area topic paper, which is detailed in the response to question 1.33. Each individual site assessment analyses the planning permissions setting out where the permission has been implemented and a proposed change to the General Employment Area boundary is required.
5. The review of each General Employment Area boundary has been consistently applied to every GEA within the District and the proposed changes are considered to be robust.

1.35 Is the boundary for each GEA robust and are the proposed alterations to some boundaries justified?

6. Each GEA within the District has been assessed through the General Employment Area topic paper. Planning permissions have been assessed on every site to ensure that all GEAs consist predominantly of B class uses.
7. The proposed alterations are based on the most up to date information regarding planning permissions on each of the GEAs. Through the General Employment Area Topic Paper four alterations to the GEAs are proposed. The justification for these proposed alterations are set out within the topic paper itself at paragraphs 2.27, 2.40 and 2.64.

8. The Council consider that the boundary for each GEA is robust and that the proposed alterations are justified.

1.36 Has the retail permission on Gaymer Industrial Estate, Attleborough now lapsed?

9. The retail permission on Gaymer Industrial Estate expired as of the 30/07/2018 as no reserved matters application has been submitted.

1.37 Is the Council's approach to not removing sites with planning permission for other uses within GEAs, until they are implemented, justified?

10. Applications that have not been implemented may lapse or may be superseded with further applications. Until an application has been implemented it is not considered appropriate to change the boundary of a GEA; in the case that an application does lapse, the employment status of the land should continue to be protected through policy.

1.38 Would the suggested amendments to the GEAs have a significant impact upon the provision of employment land within the District?

11. As set out in paragraphs 5.1 and 5.2 of the General Employment Areas and the approach to Snetterton topic paper (EX 83), the 2013 Breckland Employment Growth Study (LP/ER/1) assessed a range of scenarios setting out a range of land requirements for the period 2011-2031; these scenarios range from 31.6 hectares to 74.7 hectares. An update to the 2013 study, the 2017 Employment Growth Study Update (LP/ER/05), sets out a range of scenarios for between -8.9 hectares and 89.4 hectares. Policy EC01 of the Local Plan proposes at least 64 hectares of employment land which has been informed by the findings of the Employment Growth Study and the Growth Study Update.
12. Section 5 of the General Employment Area topic paper sets out that the suggested amendments to the GEAs would result in a loss of 4.31 hectares of employment land. This is due to a change in the boundary to GEA6 Rashes Green Dereham, GEA10 Eco-tech business Park Swaffham, and two changes to GEA16 Burrell Way Thetford. These changes equate to a loss of 1.7 hectares in Dereham, 1.45 hectares in Swaffham and 1.16 hectares in Thetford.
13. The loss of employment land within the District is not considered to have an impact upon the overall level of demand for employment land when considered in the context of the Council's ambitious employment strategy, as set out in Policy EC 01. The Employment Growth Study Update (LP/ER/05) provides information on each of the locations where a loss of employment land is proposed informing the potential impact that this may have.

Dereham

14. The Employment Growth Study Update indicates that there is an adequate supply/demand balance with a moderate level of market demand. The loss of 1.7 hectares could place further pressure upon the supply/demand balance. However, there is still an adequate supply of employment land and the Council is proposing not to supersede site D5, allocated for 3 hectares of employment land through the Site Specific Policies and Proposals Development Plan Document (LP/D/2), and is actively working on bringing the site forward.

Swaffham

15. The Employment Growth Study Update indicates that there is an over-supply supply/demand balance with low level of market demand. The loss of 1.45 hectares could place further pressure upon the supply demand balance. However, in the context of over-supply and low demand it is considered that there would still be an adequate supply of employment land within Swaffham. The Local Plan is proposing not to supersede sites SW1 and SW2, allocated for 13 hectares of employment land through the Site Specific Policies and Proposals Development Plan Document (LP/D/2), and is actively working on bringing the sites forward.

Thetford

16. The Employment Growth Study Update indicates that there is an adequate supply demand balance with a high level of market demand. The loss of 1.16 hectares could place further pressure upon the supply demand balance. The Local Plan is proposing not to supersede Policy TH30 of the Thetford Area Action Plan (LP/D/3), which seeks to allocate 22 hectares of employment land. In this context, there is still an adequate supply of employment land within the town.

Proposed Modifications

17. As a result of the Statement of Common Ground – Breckland Council and Snetterton Park Limited, a modification is proposed to Policy EC01 to reflect the proposed allocation. This allocation is as a result of further evidence of high levels of demand within the area. The landowners require more certainty than policy wording in order to market the land effectively. This proposed allocation would increase the overall quantum of employment allocation to 68.3 hectares. This additional 4.3 hectare allocation offsets the loss of employment land through the General Employment Area topic paper, therefore not exceeding the overall quantum of employment land in the District as originally proposed. The Council seek to propose the following modification to Policy EC 01 in order to reflect this:

Policy EC 01 Economic Development

For the period 2011 – 2036, ~~64~~ 68.3 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 ~~20~~ 24.3 Ha

18. The proposed modification to the plan has been subject to a sustainability appraisal, set out in Appendix 1 of this topic paper. This illustrates that the policy amendments would still score positively when assessed against the sustainability criteria and also scores more positively than the reasonable alternatives. The amendments are considered to reflect the strategic ambitions of the Council and are in line with the evidence of the 2013 Employment Growth Study and the 2017 Employment Growth Study Update.
19. It is considered that the suggested amendments would not have a significant impact upon the provision of employment land within the district. This impact is further mitigated by the addition of a proposed allocation within Snetterton Heath.

Snetterton

1.39 Is the Snetterton GEA boundary, as now proposed in the topic paper, justified?

20. Section 4 of the Council's General Employment Area topic paper (EX 83) sets out the assessment of the Snetterton Heath GEA boundary. This details the rationale behind the previous boundary amendment and the subsequent decision not to change the GEA boundary. The approach taken in this decision making process followed the methodology of the General Employment Area topic paper that has been applied to

all GEAs within the district. As a result of this consistent approach it is considered that the GEA boundary, as proposed in the topic paper, is justified.

1.40 Why does the Council consider that planning permission 3PL/2008/0600/O does not require a change to the GEA boundary?

21. Part of the application was already included within the General Employment Area. The part included within the GEA boundary contains the B-class uses (site plan included in Appendix 2). The remaining part of the planning permission includes the entirety of the race track, reflecting alterations to the track included within the permission. It is not considered that a change to the GEA boundary is required as the track itself is not a B-class use.

1.41 Is the approach to Snetterton Heath (including the proposed modifications) set out in Policy EC02 justified?

22. Policy EC 02 builds upon Policy EC 01, which seeks to allocate at least 20 hectares of employment land at Snetterton. Through the proposed modification in this topic paper, this would be amended to allocate at least 24.3 hectares of employment land at Snetterton.
23. The policy has been informed through regular meetings with the landowners of Snetterton Heath and interested parties through the Land Owners Consortium. The major landowners were engaged specifically in relation to the Electricity Upgrade Project. 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.
24. Based on the discussions both one to one and with the group it was considered that the approach to zoning of the site was required. This reflects largely what is already emerging on the ground: The northern section of the General Employment Area already has a major new food processing plant, and is likely to appeal to further industrial scale processing plants; the eastern section is already dominated by a well-developed storage, logistics and distribution cluster; the southern section, due to the racing circuit, is likely to appeal to uses related to engineering and the automotive industry.
25. In line with the findings of the A11 Growth Corridor – Feasibility Study (LP/V/8), the Economic Growth Potential of the Cambridge Norwich Technology Corridor (LP/V/9) and through meetings with major landowners, 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-relationship between the activities carried out across the site. The policy also seeks to provide flexibility through the wording 'will be preferred'. The policy is therefore in conformity with paragraph 22 of the NPPF.

26. A proposed modification was proposed to Policy EC 02 through the General Employment Areas and approach to Snetterton Topic Paper (EX 83), which set out that development proposals will be supported for compatible uses adjacent to the southern extent of Snetterton Heath General Employment Area. The intention behind this is to ensure that development is not restricted in this area and that proposals that come forward within the area for uses that are consistent with the vision of the A11 corridor will be considered favourably by the Council. Through the Statement of Common Ground – Breckland District Council and Snetterton Park Limited, additional changes are made to the policy in order to reflect the proposed allocation. The additional changes are highlighted in red:

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, including LP[087]011A 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;

4 3. Development proposals, for compatible uses, immediately adjacent to the southern extent of the General Employment Area, including LP[087]011A, as defined on the policies map, will be supported where they contribute to the overall vision for the A11 corridor;

3 4. 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

5. 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.

27. The proposed amendments to the policy have been assessed through the Sustainability Appraisal (LP/S/3) and the policy scores more positively than the alternative option, which is to rely on the other policies within the plan, particularly the criteria regarding Inclusive Communities and Economic Activity. Appendix 1 includes an updated SA of the policy. This illustrates that the policy amendments would still score positively when assessed against the sustainability criteria and also scores more positively than the reasonable alternatives.

28. The approach to Snetterton Heath in Policy EC 02 is in line with the Council's strategic vision for the A11 Corridor, has been developed through detailed, regular discussions with the Land Owners Consortium, is reflective of what has been

developed on the site in recent years and is supported by the Sustainability Appraisal.

1.42 Is the proposed modification to support employment uses to the south of the Snetterton GEA boundary (which does not form a site allocation) justified?

29. This approach has now been modified through the proposed Statement of Common Ground – Breckland District Council and Snetterton Park Limited. The Council is now proposing an allocation, Snetterton Employment Allocation 3, for a total of 4.3 hectares. Appendix 3 provides the site assessment, sustainability appraisal and further detailed information regarding the assessment of the site.

30. Justification for the proposed amendments is detailed in the Council's response to question 1.38. The approach within the Statement of Common Ground is considered to be the most appropriate strategy in order to achieve the Strategic Vision of the Breckland Local Plan and to provide certainty to the landowners when marketing the site.

Policy EC03

1.43 Are the Council's proposed changes to Policy EC03 and its supporting text justified?

31. A number of changes are proposed to the supporting text of the policy itself as set out within the Main Modifications Table (LP/S/24BB) through modification MA/EC/03/C:

- Paragraph 6.67 sets out a definition of mixed use development and uses the NPPF definition of a town centre use. This provides the clarity over the interpretation of the policy wording.
- Paragraph 6.69 adds detail on marketing periods, reflecting paragraph 22 of the NPPF. This sets out that, in order to consider an employment site as having no reasonable prospect of coming into use, justification would be needed as to whether the site is no longer suitable, available and/or economically viable including evidence of appropriate marketing and market demand.

32. Amendments to the policy wording itself reflect discussions through the matter 9 hearing sessions:

- An additional sentence has been included within the first paragraph to ensure that the policy also refers to employment allocations that have not been superseded and proposed employment allocations as defined on the policies maps. This modification seeks to provide protection to these sites.
- Bullet points two and four have been combined to ensure the policy is more succinct.

- Bullet point five has been removed as this would conflict with the supporting text and the definition of town centre uses as set out in the NPPF.

33. The proposed modifications to Policy EC 03 and the supporting text are considered to be justified as these reflect national policy and seek to strengthen the Council's overall employment strategy.

1.44 To be justified, should Policy EC03 itself refer to evidence being demonstrated of appropriate marketing periods and future market demand to justify alternative development being permitted on employment sites?

34. Within the Main Modifications table (LP/S/24BB) a proposed modification under the reference MA/EC/03/B is proposed to the supporting text of Policy EC 03. This proposed amendment seeks to reflect national policy and provides clarification on marketing periods. The proposed modification ensures that a reference to evidence being demonstrated of appropriate marketing periods and future market demand to justify alternative development being permitted on employment sites is set out within the policy itself. The proposed modification is set out in red as follows:

Policy EC 03 General Employment Areas

Sites that are identified as General Employment Areas, employment allocations that have not been superseded and proposed employment allocations 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:

1. It is not a town centre use-, unless the location is sequentially preferable and need has been demonstrated;
2. It will not undermine the function of the wider employment area;
3. The scale, bulk and appearance of the development is compatible with the character of its surroundings;
4. 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
5. 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 (B1, B2 and B8 uses);
- ~~Are compatible with existing employment uses;~~
- Support the improvement of an employment area that is in need of upgrading;
- Are compatible and ~~Do not~~ do not constrain the operations of adjoining businesses; and
- ~~Are capable of reinstatement for business and industrial use.~~

Where the site is considered as having no reasonable prospect of coming into use justification would be needed as to whether the site no longer suitable, available and/or economically viable, including evidence of appropriate marketing and future market demand.

1.45 Should Policy EC 03 also relate to employment sites not located within a GEA?

35. It is not considered that policy EC 03 should refer to all employment within the District. However, it is recognised that further protection should be given to employment uses that do not site within a General Employment Area or a proposed or not superseded allocation. A modification is therefore proposed to Policy EC 04 in order to provide this recognition and is highlighted in red below.

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.

Existing Employment (Outside General Employment Areas, employment allocations that have not been superseded and proposed employment allocations)

Employment uses in locations outside of those outlined in Policy EC 03 are considered important to the rural economy. Conversion and redevelopment of, or change of use from, existing employment sites and buildings to non-employment uses will be considered on their merits.

1.46 The Council has set out that if an application were to be submitted on a site where there is an existing employment use, but is not within a General Employment Area, this would be taken into consideration as part of the planning balance. However, how can this be the case if the employment site has no protection in the development plan?

36. The proposed modification to Policy EC 04, outlined in the response to question 1.45, would allow this to be taken into consideration as part of the planning balance.

1.47 The Council has also set out that it is not considered appropriate to protect all forms of employment use within the District as there may be examples where employment uses are located in areas that are not considered appropriate for employment use. Is this justified? Should this be set out in Policy?

37. The proposed modification to Policy EC 04, outlined in the response to question 1.45, sets this out in policy.

Policy EC 01 - Economic Development

	Sustainability Objective																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
EC 01	-	+	0	0	+	+	+	0	0	0	+	N/a	0	+	+	0	+	++	++
Alternative Option 1: Lower level of employment land	0/-	+	N/a	N/a	+	+	+	0	0	0	+	N/a	0	+	+	0	0/+	+	0
Alternative Option 2: Employment growth based on past take up rates	--	+	N/a	N/a	+	+	+	0	0/-	0	+	N/a	0	+	+	0	+	++	++
<p>Comments: The three options presented all look to increase the level of employment growth within Breckland and have regard to the findings of the Employment Growth Study. The proposed policy seeks to allocate employment growth in line with the 'policy on' scenario set out within the Employment Growth Study. All the approaches score well against the sustainability objectives related to the provision of employment land for the local economy. The Employment Growth Scenario based on past take up rates will require a greater supply of land. This will have an impact upon development on undeveloped land, due to the limited levels of brownfield land in Breckland.</p>																			

Table 12.104 Summary Table Economic Development

LOCAL PLAN POLICY: EC 01 Economic Development				
SEA/SA Topic	Sustainability Appraisal Objective	L	++	Assessment of policy against sustainability objective
	Decision making (Appraisal) questions	D	0	
		N	--	
		ST	P	

		MT LT	T		
Land, water and Soil Resources	1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings and encourage the recycling/reuse of onsite resources to minimise the impacts on the environment and safeguard resources for the future generations.	L	-	The majority of the employment land required over this plan period will be met through the existing allocations. These are predominantly located on greenfield land, and as such score negatively against the SA objective.	
		MT	P		
	2. Limit water consumption to the capacity of natural processes and storage systems and maintain and enhance water quality.	D	+		The level and location of employment development has been informed by the Breckland Water Cycle Study. The evidence base shows that there is sufficient water capacity to support the employment development.
		MT	P		
	3. Ensure the sustainable reuse of water to accommodate additional growth and development with minimal impacts on water quality.	D	0		
		MT	P		
Climate change and air pollution	4. Minimise the production of waste and support the recycling of waste.	D	0	The policy allocates employment land to the District's five market towns and Snetterton Heath. These areas are served by public transport.	
		MT	P		
	5. Reduce contributions to climate change and localised air pollution.	D	+		The policy allocates employment land to the District's five market towns and Snetterton Heath. These areas are served by public transport.
		MT	P		
	6. To adapt to climate change and avoid, reduce and manage flood risk.	D	+		The employment site selection has been informed by the Breckland Strategic Flood Risk Assessment. Breckland has significant proportions of land within Flood zone 1 and this should be used in the first instance.
		ST	P		
Biodiversity	7. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.	L	+	The sites have been assessed having due regard to the findings of the Landscape Character Assessment and the Settlement Fringe Study.	
		MT	P		

	8. Protect, enhance and increase Green Infrastructure in the District.	L	0	The policy itself does not incorporate green infrastructure, this will need to be considered as part of any planning application.
		MT	P	
Cultural heritage and landscape	9. Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character.	L	0	The land allocations have been considered having regard to the Landscape Character Assessment and the Settlement Fringe Study, however the impact will be dependent on the planning application.
		MT	P	
	10. Conserve and where appropriate enhance the historic environment.	L	0	The land allocations have been considered having regard to the Landscape Character Assessment and the Settlement Fringe Study, however the impact will be dependent on the planning application.
		MT	P	
Population and human health	11. Improve the health and well being of the population.	L	+	The sites are located in areas with access to other services and facilities.
		MT	P	
	12. Reduce and prevent crime	N/a	N/a	This should be included in the design at the planning application stage
		N/a	N/a	
	13. Improve the quality and quantity of publicly accessible open space.	L	0	Employment land allocations will not require an increase in public open space.
		ST	P	
Inclusive communities	14. Improve the quality, range and accessibility of essential services and facilities.	L	+	The employment land is being focused on the District's five market towns which is in accordance with the employment growth study. This will improve access to services and facilities.
		MT	P	
	15. Redress inequalities related to age, gender, disability, race, faith, location and income.	D	+	Thetford is the area of the District which scores lowest against the indices of multiple deprivation. Increases in employment land availability in this area will help this.
		MT	P	
	16. Ensure all groups have access to affordable, decent and appropriate housing that meets their needs.	D	0	The policy seeks to allocate new employment land in accordance with the spatial strategy. Whilst there is not a direct link to housing within the policy, the strategy is in line with the housing allocations.
		MT	P	

Economic Activity	17. Increase the vitality and viability of existing town centres.	D	+	The majority of employment land will be allocated to the Districts market towns, the population increases in this area will provide a secondary benefit to the town centre in the medium term.		
		MT	P			
	18. Help people gain access to satisfying work appropriate to their skills, potential and place of residence.	D	++		The employment allocations are predominantly within the market towns in accordance with the findings of the employment growth study, this approach therefore score highly against the sustainability objective.	
		MT	P			
	19. Improve the efficiency, competitiveness and adaptability of the local economy.	D	++			The policy will see an increase in employment land availability in accordance with the employment growth study.
		MT	P			

Table 12.105

Alternative Option 1: Lower level of employment growth				
SEA/SA Topic	Sustainability Appraisal Objective Decision making (Appraisal) questions	L D N	++ 0 --	Assessment of policy against sustainability objective
Land, water and Soil Resources	1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings and encourage the recycling/reuse of onsite resources to minimise the impacts on the environment and safeguard resources for the future generations.	ST	P	The majority of the employment land required over this plan period will be met through the existing allocations. These are predominantly located on greenfield land, and as such score negatively against the SA objective. A lower level of employment land will reduce the amount of land required.
		MT	T	
		LT		
		L	0/-	
		MT	P	
Land, water and Soil Resources	2. Limit water consumption to the capacity of natural processes and storage	D	+	The level and location of employment development has been informed by the Breckland Water Cycle Study. The evidence base shows that there
		MT	P	

	systems and maintain and enhance water quality.			is sufficient water capacity to support the employment development
	3. Ensure the sustainable reuse of water to accommodate additional growth and development with minimal impacts on water quality.	N/a	N/a	
		N/a	N/a	
Climate change and air pollution	4. Minimise the production of waste and support the recycling of waste.	N/a	N/a	
		N/a	N/a	
	5. Reduce contributions to climate change and localised air pollution.	D	+	The policy allocates employment land to the District's five market towns and Snetterton Heath. These areas are served by public transport.
		MT	P	
	6. To adapt to climate change and avoid, reduce and manage flood risk.	D	+	The employment site selection has been informed by the Breckland Strategic Flood Risk Assessment. Breckland has significant proportions of land within Flood zone 1 and this should be used in the first instance.
		ST	P	
Biodiversity	7. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.	L	+	The sites have been assessed having due regard to the findings of the Landscape Character Assessment and the Settlement Fringe Study.
		MT	P	
	8. Protect, enhance and increase Green Infrastructure in the District.	L	0	The policy itself does not incorporate green infrastructure, this will need to be considered as part of any planning application.
		MT	P	
Cultural heritage and landscape	9. Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character.	L	0	The land allocations have been considered having regard to the Landscape Character Assessment and the Settlement Fringe Study, however the impact will be dependent on the planning application.
		MT	P	
	10. Conserve and where appropriate enhance the historic environment.	L	0	The land allocations have been considered having regard to the Landscape Character Assessment and the Settlement Fringe Study, however the impact will be dependent on the planning application.
		MT	P	

Population and human health	11. Improve the health and well being of the population.	L	+	The sites are located in areas with access to other services and facilities.
		MT	P	
	12. Reduce and prevent crime	N/a	N/a	This should be included in the design at the planning application stage.
		N/a	N/a	
	13. Improve the quality and quantity of publicly accessible open space.	L	0	Employment land allocations will not require an increase in public open space.
		ST	P	
Inclusive communities	14. Improve the quality, range and accessibility of essential services and facilities.	L	+	The employment land is being focused on the District's market towns which is in accordance with the employment growth study. This will improve access to services and facilities.
		MT	P	
	15. Redress inequalities related to age, gender, disability, race, faith, location and income.	D	0/+	Thetford is the area of the district which scores lowest against the indices of multiple deprivation. A lower level of employment land compared to the preferred approach may reduce access to employment opportunities.
		MT	P	
	16. Ensure all groups have access to affordable, decent and appropriate housing that meets their needs.	D	0	The policy seeks to allocate new employment land in accordance with the spatial strategy. Whilst there is not a direct link to housing within the policy, the strategy is in line with the housing allocations.
		MT	P	
Economic Activity	17. Increase the vitality and viability of existing town centres.	D	0/+	The majority of employment land will be allocated to the District's market towns, the population increases in this area will provide a secondary benefit to the town centre in the medium term. A lower level of employment land than the preferred direction may reduce access.
		MT	P	
	18. Help people gain access to satisfying work appropriate to their skills, potential and place of residence.	D	+	The employment allocations are predominantly within the market towns in accordance with the findings of the employment growth study, this approach therefore score positively against the sustainability objective.
		MT	P	

	19. Improve the efficiency, competitiveness and adaptability of the local economy.	D	0	A lower level of employment land may reduce choice within the market and impact on the local economy.
		MT	P	

Table 12.106

Alternative Option 2: Allocate employment land based on past take up rates				
SEA/SA Topic	Sustainability Appraisal Objective Decision making (Appraisal) questions	L D N ST MT LT	++ 0 -- P T	Assessment of policy against sustainability objective
Land, water and Soil Resources	1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings and encourage the recycling/reuse of onsite resources to minimise the impacts on the environment and safeguard resources for the future generations.	L MT	-- P	Relying on past take up rates will see the requirement for more land to be made available for employment uses. Due to the limited quantum of brownfield land available within Breckland it is likely that the majority of this will be undeveloped land.
	2. Limit water consumption to the capacity of natural processes and storage systems and maintain and enhance water quality.	D MT	+ P	
	3. Ensure the sustainable reuse of water to accommodate additional growth and development with minimal impacts on water quality.	N/a N/a	N/a N/a	
Climate change and air pollution	4. Minimise the production of waste and support the recycling of waste.	N/a N/a	N/a N/a	The policy allocates employment land to the District's five market
	5. Reduce contributions to climate change and localised air pollution.	D	+	

		MT	P	towns and Snetterton Heath. These areas are served by public transport.
	6. To adapt to climate change and avoid, reduce and manage flood risk.	D	+	The employment site selection has been informed by the Breckland Strategic Flood Risk Assessment. Breckland has significant proportions of land within Flood zone 1 and this should be used in the first instance.
		ST	P	
Biodiversity	7. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.	L	+	The sites have been assessed having due regard to the findings of the Landscape Character Assessment and the Settlement Fringe Study.
		MT	P	
	8. Protect, enhance and increase Green Infrastructure in the District.	L	0	The policy itself does not incorporate green infrastructure, this will need to be considered as part of any planning application.
		MT	P	
Cultural heritage and landscape	9. Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character.	L	0/-	The land allocations have been considered having regard to the Landscape Character Assessment and the Settlement Fringe Study, however the impact will be dependent on the planning application. The requirement for more land to be made available may have an adverse impact upon the landscape and townscape.
		MT	P	
	10. Conserve and where appropriate enhance the historic environment.	L	0	The land allocations have been considered having regard to the landscape character assessment and the settlement fringe study, however the impact will be dependent on the planning application. The requirement for more land to be made available may have an adverse impact upon the historic environment.
		MT	P	
Population and human health	11. Improve the health and well being of the population.	L	+	The sites are located in areas with access to other services and facilities.
		MT	P	
	12. Reduce and prevent crime	N/a	N/a	This should be included in the design at the planning application stage
		N/a	N/a	

	13. Improve the quality and quantity of publicly accessible open space.	L	0	Employment land allocations will not require an increase in public open space.
		ST	P	
Inclusive communities	14. Improve the quality, range and accessibility of essential services and facilities.	L	+	The employment land is being focused on the District's market towns which is in accordance with the employment growth study. This will improve access to services and facilities.
		MT	P	
	15. Redress inequalities related to age, gender, disability, race, faith, location and income.	D	+	Thetford is the area of the district which scores lowest against the indices of multiple deprivation. Increases in employment land availability in this area will help this.
		MT	P	
	16. Ensure all groups have access to affordable, decent and appropriate housing that meets their needs.	D	0	The policy seeks to allocate new employment land in accordance with the spatial strategy. Whilst there is not a direct link to housing within the policy, the strategy is in line with the housing allocations.
		MT	P	
Economic Activity	17. Increase the vitality and viability of existing town centres.	D	+	The majority of employment land will be allocated to the District's market towns, the population increases in this area will provide a secondary benefit to the town centre in the medium term.
		MT	P	
	18. Help people gain access to satisfying work appropriate to their skills, potential and place of residence.	D	++	The employment allocations are predominantly within the market towns in accordance with the findings of the employment growth study, this approach therefore score highly against the sustainability objective.
		MT	P	
	19. Improve the efficiency, competitiveness and adaptability of the local economy.	D	++	Having regard to past take up rates will see an increase in employment land availability in accordance with the employment growth study.
		MT	P	

Table 12.107

Policy EC 02 - Snetterton Heath

	Sustainability Objective																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
EC 02	-	N/a	N/a	N/a	N/a	N/a	N/a	N/a	0	N/a	N/a	N/a	N/a	N/a	++	N/a	N/a	++	++
Alternative Option: Rely on other policies within the Local Plan	-	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	-

Comments: The sustainability appraisal shows that the policy scores positively against the requirement to provide new employment land within the District and ensure that the economy is competitive and adaptable. Snetterton remains an important employment location within Breckland. Including within the policy the opportunity to direct different B class uses to different areas of the site also scores positively against the appraisal objectives.

Table 12.108 Summary Table Snetterton Heath

LOCAL PLAN POLICY: EC02 Snetterton Heath				
SEA/SA Topic	Sustainability Appraisal Objective Decision making (Appraisal) questions	L D N	++ 0 --	Assessment of policy against sustainability objective
Land, water and Soil Resources	1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings and encourage the recycling/reuse of onsite resources to minimise the impacts on the environment and safeguard resources for the future generations.	L ST	- P	There is limited brownfield land available within the District. The allocation of employment land at Snetterton would require the use of primarily greenfield land with some brownfield land. However, overall, this scores negatively against this criteria.
	2. Limit water consumption to the capacity of natural	N/a	N/a	

	processes and storage systems and maintain and enhance water quality.	N/a	N/a		
	3. Ensure the sustainable reuse of water to accommodate additional growth and development with minimal impacts on water quality.	N/a	N/a	This would be dependent on the design of the buildings.	
		N/a	N/a		
Climate change and air pollution	4. Minimise the production of waste and support the recycling of waste.	N/a	N/a		
		N/a	N/a		
	5. Reduce contributions to climate change and localised air pollution.	N/a	N/a		
		N/a	N/a		
	6. To adapt to climate change and avoid, reduce and manage flood risk.	N/a	N/a		
		N/a	N/a		
Biodiversity	7. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.	N/a	N/a		
		N/a	N/a		
	8. Protect, enhance and increase Green Infrastructure in the District.	N/a	N/a		
		N/a	N/a		
Cultural heritage and landscape	9. Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character.	L	0	The policy includes the requirement for employment development to include suitable landscaping to minimise impact.	
		ST-LT	P		
	10. Conserve and where appropriate enhance the historic environment.	N/a	N/a	The policy does not include any specific reference to the historic environment. This was considered in the Historic Character Assessment would be dealt with through other policies within the Local Plan.	
		N/a	N/a		
	Population and human	11. Improve the health and well being of the population.	N/a	N/a	
			N/a	N/a	

health	12. Reduce and prevent crime	N/a	N/a	
		N/a	N/a	
	13. Improve the quality and quantity of publicly accessible open space.	N/a	N/a	
		N/a	N/a	
Inclusive communities	14. Improve the quality, range and accessibility of essential services and facilities.	N/a	N/a	The policy seeks to provide 24.3ha of employment with guidance on different B uses within the site. The policy is designed to support a range of job types suitable for people seeking a variety of work opportunities.
		N/a	N/a	
	15. Redress inequalities related to age, gender, disability, race, faith, location and income.	D	++	
		LT	P	
	16. Ensure all groups have access to affordable, decent and appropriate housing that meets their needs.	N/a	N/a	
		N/a	N/a	
Economic Activity	17. Increase the vitality and viability of existing town centres.	N/a	N/a	The policy seeks to provide 24.3ha of employment with guidance on different B uses within the site. The policy is designed to support a range of job types suitable for people seeking a variety of work opportunities.
		N/a	N/a	
	18. Help people gain access to satisfying work appropriate to their skills, potential and place of residence.	D	++	
		LT	P	
	19. Improve the efficiency, competitiveness and	D	++	

	adaptability of the local economy.	LT	P	Breckland, extension to the site will help to meet employment needs within the District and as such it score positively against this criteria.
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Table 12.109

Alternative Option: Don't define areas of the site for different employment uses				
SEA/SA Topic	Sustainability Appraisal Objective	L D N	++ 0 --	Assessment of policy against sustainability objective
	Decision making (Appraisal) questions	ST MT LT	P T	
Land, water and Soil Resources	1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings and encourage the recycling/reuse of onsite resources to minimise the impacts on the environment and safeguard resources for the future generations.	L ST	- P	Not defining B class uses within the general employment area would not impact upon the loss of undeveloped land.
	2. Limit water consumption to the capacity of natural processes and storage systems and maintain and enhance water quality.	N/a N/a	N/a N/a	
	3. Ensure the sustainable reuse of water to accommodate additional growth and development with minimal impacts on water quality.	N/a N/a	N/a N/a	
Climate change and air pollution	4. Minimise the production of waste and support the recycling of waste.	N/a N/a	N/a N/a	
	5. Reduce contributions to climate change and localised air pollution.	N/a	N/a	

		N/a	N/a	
	6. To adapt to climate change and avoid, reduce and manage flood risk.	N/a	N/a	
		N/a	N/a	
Biodiversity	7. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.	N/a	N/a	
		N/a	N/a	
	8. Protect, enhance and increase Green Infrastructure in the District.	N/a	N/a	
		N/a	N/a	
Cultural heritage and landscape	9. Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character.	N/a	N/a	
		N/a	N/a	
	10. Conserve and where appropriate enhance the historic environment.	N/a	N/a	
		N/a	N/a	
Population and human health	11. Improve the health and well being of the population.	N/a	N/a	
		N/a	N/a	
	12. Reduce and prevent crime	N/a	N/a	Depends on the specification within the planning application.
		N/a	N/a	
	13. Improve the quality and quantity of publicly accessible open space.	N/a	N/a	
		N/a	N/a	
Inclusive communities	14. Improve the quality, range and accessibility of essential services and facilities.	N/a	N/a	
		N/a	N/a	
	15. Redress inequalities related to age, gender, disability, race, faith, location and income.	N/a	N/a	
		N/a	N/a	
	16. Ensure all groups have access to affordable, decent and	N/a	N/a	
		N/a	N/a	

	appropriate housing that meets their needs.			
Economic Activity	17. Increase the vitality and viability of existing town centres.	N/a	N/a	
		N/a	N/a	
	18. Help people gain access to satisfying work appropriate to their skills, potential and place of residence.	L/D	-	By defining the employment area into zones by uses this helps to ensure that a range of job types are available.
		ST-LT	P	
	19. Improve the efficiency, competitiveness and adaptability of the local economy.	L/D	-	Directing employment uses to different areas of the employment site has the benefit of ensuring compatible uses are well related to each other. Not including this may impact upon the competitiveness and adaptability of the employment area.
		ST-LT	P	

Table 12.110



Appendix 3- Assessment of Proposed Snetterton Heath Employment Allocation 3

Site Assessment – LP[003]011A Land at Snetterton Heath, Snetterton

The site has been assessed in accordance with the Site Selection Topic Paper methodology. A summary of the process is provided followed by the detailed assessment including sustainability appraisal, sequential test, housing and economic land availability assessment, historic characterisation study and comments from Norfolk County Council Highways Authority.

Stage 1 – Site Selection

A larger version of the site was submitted to the Planning Policy Team through the Preferred Directions consultation.

Stage 2 – Sustainability Appraisal

The site has been assessed against the 19 SA objectives. The site performed positively against the criteria and is considered a reasonable option for development in general sustainability terms. The reduced version of the site has been re-assessed and included within this assessment.

Stage 3 – Site Assessment

The site has been assessed against the methodology for the Housing and Economic Land Availability Assessment (LP/H/8). The result of the site assessment is included within this assessment.

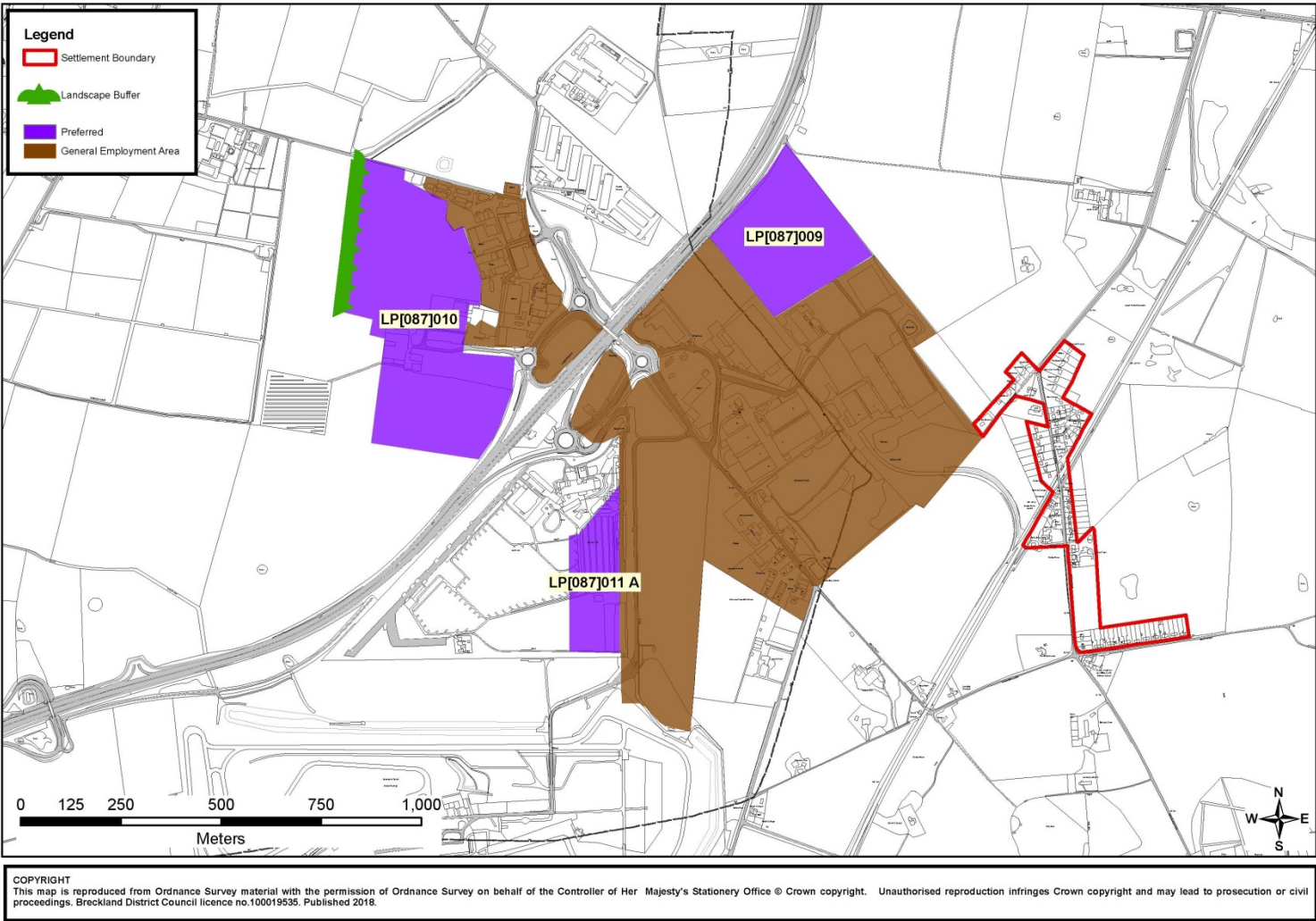
Stage 4 – Consultation Feedback

The site was considered a reasonable alternative during the Preferred Sites and Settlement Boundaries consultation. If the Local Plan was modified to allocate the site, all modifications will be subject to a six week consultation which would enable comments to be submitted and considered.

Stage 5 – Site Specific Issues

The site selection process was aided by consideration of site specific issues in relation to consideration of the impact on the historic environment through the Historic Characterisation Topic Paper (LP/E/4), consideration of flood risk in the Sequential Test (LP/E/7) aided by consultation with Norfolk County Council as the Lead Local Flood Authority, and consideration of the impact on the highway network informed through consultation with Norfolk County Council Highways Authority (LP/V/10). A request for Norfolk County Council Highway comments has been made and will be forwarded to the Program Officer in due course.

Site Location



Sustainability Appraisal

Site Reference	SA Objectives																			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Summary
LP[087]011A	+	+	+	+	0	+	+	+	+	+	0	0	0	+	0	0	-	+	+	*

* Summary comments (SA):

The site scores positively against criteria 1 due to being situated upon brownfield land. The site scores neutrally against criteria 5 and 11, but is distant from key services and facilities.

Appendix 3- Assessment of Proposed Snetterton Heath Employment Allocation 3 Housing and Economic Land Availability Assessment

Site Address	Land at Snetterton Heath	Parish	Snetterton
Current Planning Status	Site put forward through the Local Plan as part of a larger site (LP[087]011)		
Site Size	4.3	Local Plan Reference	LP[087]011A
Greenfield/Brownfield	Brownfield	Proposed Use	Employment
Ownership	MacSwiney		
Absolute Constraints Check			
SPA,SAC,SSSI or Ramsar	<input type="checkbox"/>	National Nature Reserve	<input type="checkbox"/>
Ancient Woodland	<input type="checkbox"/>	Flood Risk Zone 3b	<input type="checkbox"/>
Scheduled Ancient Monument	<input type="checkbox"/>	Statutory Allotments	<input type="checkbox"/>
Local Green Space	<input type="checkbox"/>	Exclude from Study	<input type="checkbox"/>
Development Potential	<input type="text"/>		
Density Calculator	<input type="text"/>		
Constraint	Score	Comment	
Access to Site	Green		
Accessibility to local services	Red	Distant from services but adjacent to employment uses	
Utilities Capacity	Amber	Upgrades required to electricity supply - solution found	
Contamination	Green		
Flood Risk	Green		
Market Attractiveness	Green		
Impact	Score	Comment	
Nationally and Locally Significant Landscapes	Green		
Townscape	Green		
Biodiversity and Geodiversity	Green		
Historic Environment	Green		

Appendix 3- Assessment of Proposed Snetterton Heath Employment Allocation 3

Open Space	Green
Transport and Roads	Green
Compatibility with adjoining uses	Green
Local Plan Designation	
Availability Assessment	
Marketing	Site has been put forward through the Local Plan for allocation as an employment site
Availability	Within 5 years
Build Out Rate	N/A
Achievability	The site has been promoted through the Local Plan and is in the ownership of landowners that are committed to bringing the site forward for high-quality B class employment.
Overcoming Constraints	
Trajectory of Development	unknown
Barriers to Development	
Conclusion	The site provides a suitable location for employment use and has no known constraints that cannot be overcome.

**Appendix 3- Assessment of Proposed Snetterton Heath Employment Allocation 3
Historic Characterisation Study – Addendum**

Site Reference	LP[087]011A
Site Location	Land at Snetterton Park
Buffer Zone	500m

Stage 1 Desktop Assessment

Designated Heritage Asset	Yes/No	Name and Location
Listed Building	No	
Conservation Area	No	
Scheduled Monument	No	
Registered Park and Garden	No	

Stage 2 Site Survey

Site description (including form and character, materials, massing and scale)

Previously developed land used as a Sunday market. The site is adjacent to the main access road to the race circuit with permissions for B-class uses to the east, the track to the south and a range of uses to the east and north.

Impact on designated heritage assets within the vicinity

There are no designated heritage assets within the vicinity.

Are there any non designated heritage assets within the vicinity?

None.

Landscape impact (including key views and topography)

The site is currently previously developed land but is flat with views across the site. However, there are no discernible key views from or to the site.

Prominent trees and other natural landscape features (both within and adjacent to the site)

There are a number of small shrubs and on the site but no discernible natural landscape features or prominent trees.

Policy requirements – consideration of type/design/layout of development appropriate on the site

Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this particular instance,

Conclusions and RAG rating	
	Limited impact on the historic environment, development proposals should have regard to the policy requirements within Stage 2.

Sequential Test

Settlement	Site ref	Area (ha)	No of dwellings	Flood Zone	Adj. flood zone 2/3/3b	Surface water flood risk	Surface water flood risk (% affected)	Groundwater vulnerability	LLFA comments
Snetterton	LP[087]011A	4.3	Employment land	1	N	N/A	N/A	N/A	See Appendix 4

Norfolk County Council Highway Authority comments

Snetterton Site LP[087]011A

Awaiting comment from Norfolk County Council Highway Authority. This will be forwarded to the Program Officer in due course.

Site Assessment Conclusion

Settlement	Site Reference	Address	Site Size (ha)	Summary of site assessment
Snetterton	LP[087]011A	Land at Snetterton Park	4.3	The site scores neutrally and positively against the sustainability criteria. The site is a brownfield site adjacent to the existing General Employment Area with access to the A11. No significant constraints have been identified in the assessment of the site.

via e-mail

Mr James Mann
Planning Policy Team
Breckland Council
Elizabeth House
Walpole Loke
DEREHAM
Norfolk
NR19 1EE

NCC contact number: 0344 800 8020
Textphone: 0344 800 8011

Your Ref: LP[087]011
Date: 17 August 2018

My Ref: FWS/18/3/6999
Tel No.: 01603 638082
Email: llfa@norfolk.gov.uk

Dear Mr Mann

Town and County Planning (Development Management Procedure) (England) Order 2015

Additional Local Plan allocation LP[087]011 at Snetterton

Thank you for your consultation on the above site, received on 16 August 2018. We have reviewed the allocation boundary plan as submitted and wish to make the following comments.

We have reviewed this proposed employment site against information we hold and see that it has a few constraints.

We would recommend that a standard flood risk assessment and drainage strategy are provided with any planning application. This would be a simple review the local issues including the local reports of flooding, pond inlets/outlet and control (e.g. groundwater or rainwater) and how surface water runoff from development will be managed. Infiltration should be employed for SuDS as the first step on the hierarchy but we have no information if this is achievable. As there are no watercourses immediately in the vicinity of the site and we are not aware of any surface water or combined sewers the drainage strategy may rely solely on infiltration. To protect groundwater quality, infiltration drainage should be shown to be discharge at least 1.2m above seasonally high groundwater levels.

We are also unaware if this site would be classed as brownfield, as we see there are some buildings/roadways on the plan and so would also have possible limitations on the discharge of surface water to ground or of contamination could be present and be mobilised by infiltration drainage).

Continued.../

We have assessed this site against mapped surface water flood risk. RoSFW mapping indicates that the site is not at risk from surface water flooding. We do not have any records of flooding locally.

We also note that there is a pond adjacent to the site. Please note that it would not be acceptable to discharge surface water from a development to this pond.

Further guidance on the information required by the LLFA from any applicants can be found at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>.

Yours sincerely,

Lucy

Lucy Perry
Flood Risk Officer

Lead Local Flood Authority

Disclaimer

We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.