

Matter Statement for Questions 9.10 and 9.11 on the Breckland Draft Local Plan Made on Behalf of the Stapleford Group Ltd by Evolution Town Planning

Draft Policy EC03

1. Draft Policy EC03 states that sites identified as General Employment Areas on the Policies Map will be protected for employment uses.
2. Draft Policy EC03 however permits proposals for mixed-use developments in identified employment areas where they:
 - Incorporate a significant employment element;
 - Are compatible with existing employment uses;
 - Support the improvement of an employment area that is in need of upgrading;
 - Do not constrain the operations of adjoining businesses; and
 - Are capable of reinstatement for business and industrial use.
3. Paragraph 6.67 of the draft Local Plan adds that:

“Appropriate proposals to diversify and ensure the long-term sustainability of existing employment areas will therefore be supported where they contain a significant employment element, contribute positively to the viability of the employment land and would not undermine, and are otherwise compatible with, existing employment uses.”

4. It is recommended that draft Policy EC03 is amended to support employment generating uses such as retail, trade counters, gyms, and community uses or other similar uses on allocated employment sites for the following reasons.

5. The National Planning Policy Framework (NPPF) uses a more appropriate term, 'economic development' to refer to uses which create jobs. Indeed, the NPPF moves away from previous policy approaches which sought to allocate land for Class B uses. Paragraph 22 of the NPPF provides flexibility for alternative uses of employment sites, highlighting that planning policies:

“should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”

6. The NPPF also recognises that sustainable economic growth can be delivered through the provision of a range of economic uses, including retail. Paragraph 19 is instructive in this case, noting that the planning system should do *“everything it can to support sustainable economic growth. Planning should operate to engage and not act as an impediment to sustainable growth”*.
7. Our clients own two sites in Caxton Way in Thetford both of which have been allocated for employment since 1999 in the Local Plan, they have been vacant since 2009 when the former factories that were on the sites closed. Despite being actively marketed for employment purposes for nine years there has been limited interest from B1, B2 or B8 users as evidenced in the attached marketing report. As such the sites have remained vacant.
8. Our clients received planning consent in January 2018 for a retail scheme on one of these two sites known as the Viking Site (planning application reference 3PL/2017/0949/F) and the development will commence shortly. This application was supported by evidence in the Breckland Employment Growth Study (BEGS) from

November 2013 which concluded that there is a good supply of employment land in Thetford. The BEGS also noted that the quality of the employment at the Caxton Way Industrial Estate which includes the Viking site is of a low quality in comparison to other sites in Thetford.

9. This example demonstrates that the Council should support alternative employment generating uses which are economic wealth generators and employment creating land uses on general employment sites. For example the re-use of the Viking site for another form of economic development has been shown to not have a harmful effect on Class B employment land supply within Breckland.
10. Higher value non-B uses, will also provide for the efficient re-use of sites, and will deliver a wide range of economic and social benefits for the local community; including creating new jobs in accordance with the overall economic objectives of the Local Plan. The proposed retail scheme on the Viking site will create around 200 jobs. This is likely to be significantly more than would be created even if a Class B employment scheme was viable (and is not).
11. Although retail proposals would have to pass the retail policy tests, it is important the Plan recognises that in an increasingly competitive world, the need to accommodate the new ways by which we earn our living and support a strong, responsive and competitive economy. This can only happen if policies and allocations are flexible and recognise that high value non-B Class uses can deliver significant social and economic benefits, including employment opportunities.
12. The heading to the bullet points should be amended to state (new working underlined and deleted wording crossed out): To avoid the long term protection of employment sites where there is no reasonable prospect of a site being used for that purpose proposals for ~~Mixed-use~~ other economic development in identified employment areas will be supported providing that they:

13. We suggest that that the first bullet point of Draft Policy EC03 is redrafted to state:

'Incorporate a significant element of economic development'.

14. The fifth bullet point should be deleted as it is too restrictive. These changes will ensure that the plan is positively prepared to take advantage of the opportunities for growth, is justified by being the most appropriate strategy, is effective by being sufficiently flexible to be deliverable, and accords with National Planning Policy.

Evolution Town Planning Ltd.
Opus House, Elm Farm Park
Thurston
BURY ST EDMUNDS
Suffolk IP31 3SH