

# Breckland Local Plan Examination

## **Matter 9:**

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

**Breckland District Council  
Hearing Statement**

March 2018



Issues

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

1. 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. The scenario with the highest land requirements in this range, 'Past Take-up', reflects what has been happening in the district over the years 2004 to 2012.
2. An update to the 2013 study, the 2017 Employment Growth Study Update, has been produced by Lichfields and has been added to the examination library under the reference LP/ER/05. This is considered to be the most-up-to date evidence. The Planning Practice Guidance (PPG) compliant update set out three scenarios, which consider the most up to date modelling information and address the entire plan period. These scenarios illustrate gross land requirements for between -8.9 hectares and 89.4 hectares. The scenario which sets out the highest land requirements in this range, 89.4 hectares, is again the 'Past Take-up' scenario, which reflects what has been happening in the district between 2004/5 and 2016/7.
3. The 'Past Take-Up' scenario shows the highest land requirement over the plan period in both the 2013 Employment Growth Study and the 2017 Employment Growth Study. The Past Take-up scenario reflects the amount of employment land that has been developed within the district over the period 2004/5 to 2016/17. The 2017 study states that this period "*represents a reasonable period that reflects a full business cycle with period of both economic growth and recession*" and that "*long term completions rates of employment floorspace can provide a reasonable basis for informing future land needs*".
4. Policy EC 01 proposes an additional 64 hectares of employment land through the Local Plan. It is acknowledged that within both the 2013 and 2017 studies it is demonstrated that the pipeline supply of employment sites (extant planning permissions and proposed allocations), in quantitative terms, can meet the needs of office and manufacturing space up to 2036 under all scenarios. The Council have ambitious policy aspirations regarding employment growth across the district over the plan period. These policy-on aspirations

are considered to be a step change above the 'past take up' scenarios, and could therefore, imply a higher level of employment/B class development in Breckland than indicated by the past take-up scenarios. Moreover, the pipeline supply of planning permissions comprises predominantly smaller sites of under 1 hectare that aren't considered to be suitable, in terms of level and type, to meet the Council's strategic economic growth aspirations.

5. The Council's Strategic Objectives, underpinning the Strategic Vision, regarding employment are 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 the 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.
  
6. 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.
  
7. Following discussions with Cambridgeshire based authorities this has led to an extension 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 8<sup>th</sup> 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/9), which set out an analysis of sectoral growth potential of the CNTC. The study set out a vision of a technology corridor that could generate an additional 26,000 jobs and create value of an additional £2.75bn to the economy and the recommendations on how this can be achieved.

8. The CNTC will directly support the marketing of key employment and housing sites including: Theftord Enterprise Park; Thetford Urban Extension; Snetterton Heath Employment Area; Attleborough Urban Extension; and Attleborough Employment Area. The majority (81%) of proposed employment allocations set out in Policy EC01 are within the A11 corridor. The A11 Growth Corridor – Feasibility Study (LP/V/8) sets out that the focus of the A11 Corridor is to capitalise on the significant improvement of the dualling of the A11 and other important existing assets, such as Snetterton Circuit, in order to develop a major new initiative that will establish a location for new economic investment activity with a focus on development new technology-related employment. The successful marketing of the CNTC has led to a number of enquiries being made to the Council from high-tech automotive companies wishing to take advantage of the location of sites in Breckland along the A11 corridor location. These enquiries have focused upon the quality and type of accommodation, the availability of land and the ability to be situated within a tech cluster. It is therefore fundamental that sites in these strategic locations are allocated through the Local Plan to enable growth ambitions to be realised.
  
9. Whilst the Council has ambitious policy aspirations for employment along the A11 Corridor, existing employment land in the market towns has also been lost through planning applications for alternative uses. 2.3 hectares of employment land has been lost in a retail planning application (3PL/2017/0949/F<sup>1</sup>) and a further 3.1 hectares of employment land has been lost to a residential planning application (3PL/2017/0563/O<sup>2</sup>). Whilst the loss of the 3.1 hectares of employment land has been captured in the 2017 Employment Growth Study Update, the loss of 2.3 hectares at Thetford would not have been as the application was determined on the 15<sup>th</sup> January 2018. This further justifies the need for additional, high quality, employment land to be allocated strategically in the right places through the Local Plan.

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<sup>1</sup> <http://planning.breckland.gov.uk/OcellaWeb/showDocuments?reference=3PL/2017/0949/F&module=pl>

<sup>2</sup>

<http://planning.breckland.gov.uk/OcellaWeb/planningDetails?reference=3PL/2017/0563/O&from=planningSearch>

10. The Sustainability Appraisal (LP/S/03) assessed the approach proposed in Policy EC 01 along with two reasonable alternatives: Alternative Option 1 proposes a lower level of employment land and Alternative Option 2 proposed a higher level of employment land. Alternative Option 1 scores positively against the criteria around minimising the loss of undeveloped land, but negatively in terms of economic criteria. Alternative Option 2 scores negatively in regards to the loss of undeveloped land, but positively in terms of economic criteria. The approach set out in policy EC 01 provides a balance in sustainability terms and, on the whole, scores more positively than the alternative options.

11. The Employment Growth Study 2017 provides an up to date assessment of employment growth and of the future growth potential of Breckland's economy, and illustrates that, similarly to the 2013 study, the past take up rate scenario sets out the highest level of future need in the district. This scenario is based upon what has been happening in the District between 2004/5 to 2016/17 and therefore does not fully take into account the Council's wider policy aspirations regarding the A11 Corridor. The Council, as a founding member of the CNTC, has an ambitious policy approach to employment over the plan period. The need for additional employment land has had regard to the Employment Growth Study and Growth Study update and reflects the policy aspirations of the Council. It is therefore considered to be justified and based on robust evidence.

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

12. The 2017 Employment Growth Study: Update (LP/ER/05) was prepared to specifically consider the plan period from 2011 to 2036.

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

13. Scenario 3 of the Employment Growth Study (LP/ER/01) used the OAN Figure that was available at the time of preparation, which has subsequently been updated with the publication of the Central Norfolk Strategic Housing Market Assessment (CNSHMA) (LP/H/1).

14. Scenario 3 of the 2017 Employment Growth Study: Update Report (LP/ER/05), Labour Supply, is in line with the 2017 SHMA and uses the OAN figure of 612 dpa.

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

15. The Council has had long held ambitions regarding the A11 Corridor. The Spatial Vision in the Core Strategy (LP/D/1) stated that *“Along the A11 corridor significant employment growth will have been achieved in advanced engineering, motor sport, research and development and logistics, building on the emerging employment base and taking advantage of the excellent highway network and linkages to other centres of business”*. The emerging vision within the Issues and Options consultation (LP/S/6) remained consistent with this, stating that *“the emerging vision includes directing economic growth to Thetford and the Key A11 corridor in order to bring prosperity, promoting existing engineering, motor sport, research and development and logistics in and around these locations and the connections to other higher order sustainable settlements”*.

16. The Council’s vision for economic growth within the A11 Corridor was supported by the A11 Growth Study (LP/V/8), which places emphasis upon the A11 Corridor as being a major technology hub, joining Cambridge to Norwich. This vision of the Corridor was expanded to include partners from Cambridge to Norwich, including the Greater Cambridge Greater Peterborough LEP and Norwich City Council. On the 8<sup>th</sup> 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 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. The need for additional employment land along the A11 corridor is considered to be fundamental to the aspirations of the A11 Technology Corridor and is also supportive of the significant population increase in the area.

17. This is consistent with the Council’s Strategic Vision in the Pre-submission consultation (LP/S/1). The Strategic Objectives, underpinning the Strategic Vision, regarding employment are 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.

18. The 2013 Employment Growth Study (LP/ER/1) assessed a range of scenarios, which included allocated sites and policy on scenarios and provided a range of needs for the period 2011-2031. These scenarios range from 31.6 hectares to 74.7 hectares. The scenario with the highest rate in this range, 'Past Take-up', illustrates what has been happening in the District between 2004/5 and 2012/3. These figures were published in the Issues and Options Consultation (LP/S/6), which then asked the question 'Do you agree with the view of employment space supply and demand as discussed?'

19. The Preferred Directions Part 1 consultation (LP/S/8) summarised the consultation responses identifying broad support for the key policy issues identified within the Employment Growth Study. Having regard to the 2013 Employment Growth Study (LP/ER/1) and the wider aspirations of the Council regarding the A11 Corridor, Preferred Policy Direction PD 06 'Economic Development' sought to allocate 67 hectares of employment land, as this level of growth was considered to best reflect the growth potential associated with the A11 corridor. It was set out that this would be met through at least: 20 ha at Snetterton, 10ha at Attleborough, 6ha at Dereham, 9ha at Swaffham and 22ha at Thetford. Following this consultation, a residential planning permission was granted on saved employment site D4 of the Site Specific Policies and Proposals DPD (LP/D/2). This was reflected in policy EC 01, which reduced the employment allocation for Dereham to at least 3 hectares and the overall proposed allocation/provision within the policy, consequently, reduced to 64 hectares.

20. The Employment Study Update (LP/ER/5) set out three scenarios, which ranged from - 8.9ha to 89.4 hectares. These scenarios consider the most up to date modelling information and address the plan period in its entirety from 2011-2036. The higher figure within this range is set out within the 'past take up' scenario, which reflects what has been happening within the District between 2004/5 and 2016/7. It was therefore

considered appropriate to continue with the 'past take-up' approach for the purposes of the emerging Local Plan.

21. The additional need figure of 64 hectares is reflective of the Council's ambitious strategic objectives regarding the A47 and the A11 Norwich to Cambridge Technology Corridor. The figure has also had regard to the Employment Growth Study (LP/ER/1) and the Employment Growth Study Update (LP/ER/05).

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

22. The 2017 Employment Growth Study Update (LP/ER/05) in paragraph 2.12 sets out typical ratios of jobs to floorspace for different B uses based on latest Homes and Community Agency (HCA) employment density guidance. Paragraph 2.41 provides assumptions around plot ratio assumptions to translate floorspace into land requirements. These assumptions have been used by the Council to estimate the number of jobs that will be created on the 64 hectares of employment land set out in Policy EC 01 for the following proposed allocations:

- Attleborough Employment Allocation 1: land to the west of London Road
- Dereham Saved Policy D5: Land east of Dereham Business Park
- Swaffham Saved Policy SW2: Land to the north of the Eco-Tech Centre
- Swaffham Saved Policy SW3: Land to the west of the Eco-Tech Employment Area
- Thetford Saved Policy TH30:
- Snetterton Employment Allocation 1: Land to the north west of the General Employment Area
- Snetterton Employment Allocation 2: Land to the east of the General Employment Area

23. Attleborough Employment Allocation 1 sets out that "*at least 10 hectares is allocated for employment use (within Classes B1 and B2 of the Use Classes Order)*". As a result, based on the assumption of an even split of B1 and B2, the site could provide approximately 2,044 jobs.

24. Saved Policy D5 sets out that "*land amounting to 3.1 hectares is allocated for employment use (within Classes B1, B2 and B8 of the Use Classes Order, as*



*amended*)". Based on the assumption of an even split of B1, B2 and B8, the site could provide approximately 486 jobs.

25. Saved Policy SW2 states that "*land amounting to approximately 3 hectares is allocation employment development. The development will provide a mix of B class units only*". Based on the assumption of an even split of B1, B2 and B8, the site could provide approximately 470 jobs.

26. Saved Policy SW3 states that "*land amounting to approximately 5.8 hectares is allocation employment development. The development will provide a mix of B class units only*". Based on the assumption of an even split of B1, B2 and B8, the site could provide approximately 909 jobs.

27. Saved Policy TH30 states that land amounting to at least 22 hectares "is allocated for B1 and B8 use". Based on the assumption of an even split of B1 and B8, the site could provide 4,197 jobs.

28. Snetterton Employment Allocation 1 states that "*land amounting to 14 hectares is allocated for employment use (within Classes B1 and B2 and B8 of the Use Classes Order)*". However, the policy also sets out that proposals for B1 and B2 will be preferred. Based on the assumption that 5.6ha of the site is B1, 5.6ha is B2 and 2.8ha is B8, the site could provide approximately 2,462 jobs.

29. Snetterton Employment Allocation 2 states that "*land amounting to 6 hectares is allocated for employment use (within Classes B1 and B2 and B8 of the Use Classes Order)*". However, the policy also sets out that proposals for B8 will be preferred. Based on the assumption that 3.6ha is B8, 1.2ha is B1 and 1.2ha is B2, the site could provide approximately 712 jobs.

30. The Employment Growth Study Update (LP/ER/05) sets out a 'future labour supply' scenario, which reflects the OAN and East of England Forecasting Model<sup>3</sup> in line with the Central Norfolk Strategic Housing Market Assessment (CNSHMA) (LP/H/1). This scenario showed an overall employment land requirement in Breckland of -8.9 hectares. However, the East of England Forecasting Model (EEFM) Technical Report, included within the Employment Growth Study Update (LP/ER/5), states that the study "uses

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<sup>3</sup> Paragraphs 4.75-4.83 (pages 92 to 95) of the Central Norfolk Strategic Housing Market Assessment (LP/H/1)

historical data collected over 20 years to provide a basis for estimating the relationships between variable and for forecasting future trends”<sup>4</sup>. The Technical Report also states that assumptions are made to the commuting flows over the forecast period are in line with past trends. The EEFM does not take into account the policy aspirations of the Council in regards to the Cambridge-Norwich Technology Corridor and the amount of economic activity this seeks to generate.

31. The Council’s employment aspirations reflect the opportunities presented by the Cambridge-Norwich Technology Corridor as well as seeking to support the proposed housing allocations across the district. Table 1 identifies the correlation between employment land and housing distribution, illustrating that the majority (approximately 81%) of employment land is proposed to support the large urban extensions at both Thetford and Attleborough, representing 50% of the proposed housing growth.

**Table 1: Employment proposed and proposed dwellings in the local plan**

Location	Existing land Supply* including proposed allocations	Proposed allocation in Local Plan	Population (2011 Census)	Total dwellings proposed over the plan period	% proposed housing growth
Thetford	30.3 ha (24%)	At least 22 ha	24,340	3,671	(50%)
Attleborough and Snetterton	63.6 ha (50%)	At least 30 ha (10 in Attleborough, 20 in Snetterton)	10,482 (Attleborough)	4,404 (Attleborough)	
Dereham	4.6 ha (4%)	At least 3 ha	18,609	1,766	(28%)
Swaffham	12.8 ha (10%)	At least 9 ha	7,258	1,619	
Watton	1.9 ha (1%)	No allocation	7,202	1,634	
Rural / Other	15 ha (12%)	No allocation			n/a
Total	128.2 ha	64 a		Remaining	22% of

<sup>4</sup> Paragraph 2.3 of Appendix 1 of the Breckland Employment Growth Study Update Report (LP/ER/5)

				residential allocation proposed to Local Service Centres and Villages with Boundaries.
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\*Taken from table 3.4 of the Employment Growth Study Update (LP/ER/05)

32. The additional 64 hectares of employment land could provide at least 11,280 jobs over the plan period (as set out above). The Labour Supply scenario set out within the Employment Study Update uses the most up to date OAN and the East of England Forecasting Modelling baseline employment forecast data, which is consistent with the SHMA. However, this does not take into consideration the wider policy aspiration of the Council in regards to economic development, particularly the Cambridge to Norwich Technology Corridor.

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

34. The strategy towards the distribution and quantum of growth set out in Policy EC 01 was developed through the Issues and Options Consultation (LP/S/6), which posed the question: ‘Do you consider any area could benefit from a particular form of employment development?’. The Preferred Directions consultation (LP/S/8), through Preferred Policy Direction 06, summarises the responses to the consultation, stating that: There was broad conformity with the study, but there was a desire for the A47 corridor to be recognised alongside the A11 corridor i.e. the market towns of Dereham and Swaffham.

35. This message was consistent with the Council’s Strategic Vision and Objectives, where the Council’s Strategic Objectives, underpinning the Strategic Vision, regarding employment are 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.

36. The Council's vision for economic growth within the A11 Corridor is supported by the A11 Growth Study (LP/V/8), which places emphasis upon the A11 Corridor as being a major technology hub, joining Cambridge to Norwich. This vision of the Corridor was expanded to include partners from Cambridge to Norwich, including the Greater Cambridge Greater Peterborough LEP and Norwich City Council. On the 8<sup>th</sup> 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 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. The need for additional employment land along the A11 corridor is considered to be fundamental to the aspirations of the A11 Technology Corridor and is also supportive of the significant population increase in the area.
37. The Council's policy ambitions for the A11 Corridor are further supported by the levels and location of housing growth throughout the District. Table 1 in the response to Question 9.5 sets out that 81% of proposed employment allocations are focused on Thetford, Attleborough and Snetterton, Thetford and Attleborough SUEs account for 50% of the residential development over the plan period. The remaining 19% of allocations are proposed to support the A47 corridor in Dereham and Swaffham, in line with the Council's Vision and Objectives and supported by the consultation responses at the Issues and Options stage.
38. Thetford forms a key part of the A11 Corridor strategy. Thetford's allocation of at least 22 hectares consists of the saved allocation TH 30, which was allocated in the Thetford Area Action Plan (LP/D/3). The Issues and Options consultation (LP/S/6) asked the question 'Do you consider the existing employment areas remain appropriate?' On the back of responses to this consultation the proposal to save Policy TH 30 was set out within Preferred Directions (LP/S/6) Policy PD 06. As set out in the response to question 9.5 this site is anticipated to provide 4,197 jobs. The A11 Corridor Study (LP/V/8) identified Thetford as a 'major development site' within the A11 Corridor.
39. Attleborough and Snetterton also form a key part of the A11 Corridor strategy. The broad figures for both Attleborough and Snetterton were first set out in the Core Strategy. However, production of this document was halted in order to progress the Council's Local Plan. The specific figures were detailed in the Preferred Direction (LP/S/8)

consultation before progressing to the Pre-Submission Publication (LP/S/1), which set out that Attleborough's allocation of at least 10 hectares consists of the policy Attleborough Employment Allocation<sup>1</sup> and Snetterton's allocation comprises at least 20 hectares and is made up of Snetterton Employment Allocation 1 and 2.

40. Attleborough is located in the south-east of Breckland on the A11 and is approximately equidistant between Norwich and Thetford on the main rail connection between Norwich and Cambridge. As set out in Table 1 of the response to question 9.5, it is proposed that an additional 4,404 dwellings will be built over the plan period, if a 2.3 population per dwelling multiplier<sup>5</sup> is assumed this would increase the population by 10,129, almost doubling the 2011 population. The 10 hectares of employment land supports the increasing population of the settlement, whilst also creating a further strategic employment offering along the A11 corridor. Furthermore, the made Attleborough Neighbourhood Plan (LP/D/4) sets out in Policy LE P1 that support is given for at least 10 hectares of employment land in Attleborough. The land identified within the Neighbourhood Plan is reflected in Attleborough Employment Allocation 1.
41. Snetterton Heath is located four miles to the south west of the market town Attleborough and lies both north and south of the A11, with existing, well-constructed asses to the dual carriageway in both directions through an all-movement junction. Snetterton is identified as a strategic site within the Cambridge Norwich Tech Corridor and is home to Snetterton Race Track and Motorsport Vision. As set out in the response to question 9.5 the two Snetterton sites are anticipated to collectively provide 3,174 jobs. The A11 Corridor Study (LP/V/8) identified Snetterton Heath as a 'major development site' within the A11 Corridor.
42. Dereham's allocation of at least 3 hectares consists of the saved allocation D5, which was identified through the Adopted Site Specific Policies and Proposals Development Plan (LP/D/2). The Issues and Options Consultation asked the question 'Do you consider the existing employment areas remain appropriate?'. Through the Preferred Directions consultation (LP/S/8) it was set out that at least 6 hectares was proposed to come forward, however due to a residential permission being granted on the site this was reduced to 3 hectares. The need for employment land to come forward in Dereham is

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<sup>5</sup> ONS (2013) Statistical bulletin:2011 Census: Population and household estimates for the United Kingdom, March 2011 [Online]

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesfortheunitedkingdom/2011-03-21> [Accessed 19/03/2018]

justified within the Employment Growth Study Update (2017), which states that the town “is the second largest commercial market in Breckland... (and) has also seen relatively strong level of take-up in recent years”.

43. Swaffham’s allocation of at least 9 hectares consists of the saved policies SW2 and SW3, which were identified through the Adopted Site Specific Policies and Proposals Development Plan (LP/D/2). The question was asked through the Issues and Options consultation, ‘Do you consider the existing employment areas remain appropriate?’ Based on the responses to this the Preferred Directions Consultation, through policy PD 06 set out that the allocations should be saved. According to the 2011 census<sup>6</sup> Swaffham’s population was around 7,258 and made up of 3,258 houses. Through Policy HOU 02 this is set to increase through the plan period 2011-36 by 1,612 dwellings, representing a 49.5% increase in houses in the town. Due to this increase in population it is proposed that the allocation of at least 9 hectares is appropriate. The proposed allocations are less market led, but are more reflective of the population increase within Swaffham and wider rural area.
44. The Council’s Strategic Vision regarding employment seeks to take advantage of the A47 transport link and also to “allocate employment land in the most sustainable locations where they assist in providing the right balance between the rural economy and that of the wider District’. Although the majority of employment land is focused to the south of the District, Dereham and Swaffham provide prime locations along the A47 in the north east and north west of the District. Employment allocations in these sustainable locations provides further employment for the increasing populations in these A47 Market Towns, but also provides quality employment land for the wider rural area.
45. It is not proposed to allocate further employment sites in Watton. The Strategic Vision and supporting objectives focus employment development on the strategic corridors of the A11 and the A47. Whilst employment development is not proposed in Watton, table 3.4 of the Employment Growth Study Update (LP/ER/05) shows that Watton has an ‘adequate’ supply to the year 2036.
46. The quantum for each location is reflective of the Council’s wider policy aspirations regarding the Cambridge to Norwich Technology Corridor and the A47 and has regard to the Employment Land Study and the Employment Land Study Update.

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<sup>6</sup> UK Census Data [Online] <http://www.ukcensusdata.com/swaffham-e05005741#sthash.3q3RFoyU.dpbs>  
[Accessed 05/02/2018]

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

47. Following the adoption of Policy EC 01 and the proposed employment allocations within the plan that reflect Policy EC 01, any subsequent application submitted on these sites would be assessed in line with these policies.
48. Furthermore, Policy EC 03 seeks to protect General Employment Areas and this policy is considered sufficient to control the loss of employment land.

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

49. Policy EC 02 builds upon Policy EC 01, which seeks to allocate at least 20 hectares of employment land at Snetterton.
50. The A11 Norwich-Cambridge Technology Corridor (CNTC) is a key priority of the Council and Snetterton, home to Snetterton Race Track and Motorsport Vision, is a strategic site within the Corridor. As set out in the response to question 9.5, the two proposed allocations at Snetterton Heath are proposed to deliver 3,174 jobs. The policy has had regard to the A11 Growth Study (LP/V/8), which identifies the Snetterton as a 'major development area' within the A11 Corridor. This is also reflected in the Employment Growth Study (LP/ER/01), which makes reference to the strategic location of Snetterton Heath and the high levels of demand and take up as a result.
51. 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<sup>7</sup>. 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.
52. 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

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<sup>7</sup> Paragraphs 4.9-4.15 (Pages 43-45) of the Infrastructure Delivery Plan (IDP) (LP/V/1)

processing plans; 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.

53. In line with the feasibility study (LP/ER/06) and the 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.

54. The policy has been assessed through the Sustainability Appraisal (LP/S/3) and 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.

55. 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.

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

56. The area LP[087]010 is identified on the proposals maps as 'LP[087]010 A'. A modification is proposed to ensure that the wording in the policy is in line with the proposals maps and Policy Snetterton Employment Allocation 1.

57. Policy EC 02 relates to the entire extent of the General Employment Area (Snetterton Heath North and Snetterton Heath South) and the allocations LP[087]010 A and LP[087]009, as shown on the proposals maps.

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

58. There are a significant number of employment areas across the District, each of which makes a contribution towards the local economy and provides an important source of local employment. Many of these employment areas are in key strategic locations, within the A11 Corridor and within proximity to the A47. However, many employment sites are



located in and around the villages of the district and, in line with Chapter 4 of the National Planning Policy Framework (NPPF), seek to support the rural economy.

59. The approach set out in Policy EC 03 has been previously consulted on through Preferred Policy Direction EC 01 in the Preferred Directions Consultation (LP/S/8) before being consulted on again through the pre-submission consultation (LP/S/1). This provided the opportunity for comments to be made regarding employment sites and during this process no information has come forward to suggest that any of the sites 'have no reasonable prospect' of coming forward as employment land.
60. It is acknowledged that the NPPF sets out in paragraph 22 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.
61. A saved employment allocation for 3.1 hectares, D4 'Land at Rash's Green Industrial Estate', was granted permission for residential use (3PL/2015/0046/O<sup>8</sup>). In the officer's committee report and subsequent appeal decision, reference was made to the 2013 Employment Growth Study (LP/ER/01). Although the initial application was refused the site was allowed at appeal and the employment site was subsequently removed from the Local Plan. All employment sites within the district have been subject to the same level of assessment in Table 5.2 of the 2013 Employment Growth Study. This information could be used to support the consideration of any application for an alternative use that might be proposed for any site.
62. The Council wish to retain employment sites to ensure that the Council's strategic economic ambitions can be met, maintaining the strong local economy and providing job opportunities throughout the district. The Council consider that the approach set out in Policy EC 03 is justified and effective.
63. In order to ensure that Policy EC 03 is consistent with national policy, particularly Paragraph 22 of the NPPF, it is proposed to update the policy to include the following wording: "Sites that are identified as General Employment Areas on the Policies Maps will be protected for employment use, unless there is no reasonable prospect of a site being used for that purpose".

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<sup>8</sup> Breckland Council (2018) 3PL/2017/0563/O [Online]  
<http://planning.breckland.gov.uk/OcellaWeb/planningDetails?reference=3PL/2017/0563/O&from=planningSearch> [Accessed 19/03/2018]

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

64. The approach to mixed use development within the plan seeks to ensure that where appropriate mixed use development provides a flexible approach to bring forward employment sites.

65. Paragraph 21 of the NPPF states that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. The Employment Growth Study (LP/ER/01), under the section 'Policy Implications' (pages 78-79), sets out that policies in regards to employment should be more flexible to include other non-B classes uses. The study states that some non- B class uses "may also generate local economic benefits or have identified needs that the NPPF indicates should be supported." This policy approach will ensure employment sites are not unduly constrained by being solely restricted to B class uses.

66. The policy wording was first introduced through the Preferred Directions Part 1 consultation (LP/S/8) and taken forward through the Pre-Submission Publication (LP/S/1). The policy approach scores positively compared to the reasonable alternatives within the Sustainability Appraisal (LP/S/03).

67. The approach to mixed-use seeks to align with national policy in order to be flexible and be able to respond to changes in economic circumstances. This has been developed with regard to the 2013 Employment Land Growth Study (LP/ER/01), scores positively in the Sustainability Appraisal and has been subject to public consultation.

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

68. The majority of employment development will be provided for in the strategic employment allocations outline in Policy EC 01 and on established areas in Policy EC 03. However, in a rural district such as Breckland there will be a need to provide for those businesses which support the rural economy and improve opportunities for rural communities to live and work in close proximity.

69. The Preferred Directions Part 1 Policies document (LP/S/8) introduced the policy as an update to Core Strategy (LP/D/1) Policy DC7. The Policy was then included in the Preferred Directions Part 1 Policies (LP/S/8) and taken forward through the Pre-Submission Publication (LP/S/1). The Policy and reasonable alternatives have been assessed within the Sustainability Appraisal (LP/S/3) and the policy scores more positively than the reasonable alternative.

70. This policy is in conformity with paragraph 28 of the NPPF, seeking to support the sustainable growth and expansion of all type of business and enterprise in rural areas, supporting economic growth to create jobs and prosperity.

**9.13: Is the approach to farm diversification in Policy EC 06 justified and effective?**

71. The policy seeks to ensure that agricultural businesses are sustainable and competitive. The policy offers support to well-conceived proposals relating to the diversification of farm businesses, where they can help ensure the long-term viability of existing farm business and provide rural employment opportunities.

72. The Preferred Directions Part 1 Policies document (LP/S/8) introduced Preferred Policy Direction – E 03 Farm Diversification as an update to Core Strategy (LP/D/1) policy DC 21 in line with changes to national planning policy with respect to agricultural development in the countryside. The consultation document offered reliance on the Core Strategy policy as a reasonable alternative and asked the question ‘Do you agree with the preferred policy – E 03? Please explain your answer.’ Responses to this consultation offered broad support for the policy and this was then taken forward as Policy EC 06.

73. Paragraph 28 of the NPPF states that local and neighbourhood plans should promoted the development and diversification of agricultural and other land-based rural business. The policy, as worded, seeks to achieve the aims of the NPPF whilst respecting the predominantly rural nature of the district.

74. The Policy and reasonable alternatives have been assessed within the Sustainability Appraisal (LP/S/3) and it is considered that the approach to farm diversification in Policy EC 06 is both justified and effective.

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

75. The policy recognises the valuable contribution that tourist related industries make to the local economy. The policy supports the provision of visitor accommodation through new-build, conversion or expansion in appropriate locations i.e. in line with the development hierarchy as set out in policy HOU 02.
76. Paragraph 28 of the NPPF states that local and neighbourhood plans should support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character and countryside. The policy, as worded, seeks to achieve this within the context of sustainable development and in the context of the district.
77. The Policy and reasonable alternatives have been assessed within the Sustainability Appraisal (LP/S/3) and it is considered that the approach to tourism related development is both justified and effective.

**9.15: Is the approach to advertising and signs in Policy EC 08 justified and effective?**

78. The design of advertisements and signage can have a great impact on the character and appearance of an individual building or surrounding area. The policy seeks to ensure that advertisements are of an appropriate scale and size, are well designed and are sympathetic to both the building on which they are to be displayed and the general characteristics of the locality.
79. One of the Core Planning Principles of the NPPF, which planning should seek to achieve, seeks to secure a good standard of amenity for all existing and future occupants of land and buildings. Paragraph 67 of the NPPF states that poorly placed advertisements can have a negative impact on the appearance of the built and natural environment and that control over outdoor advertisements should be efficient, effective and simple in concept and operation. It is considered that the policy as worded is in conformity with this.
80. The Policy and reasonable alternatives have been assessed within the Sustainability Appraisal (LP/S/3) and It is considered that the approach to advertising and signs in Policy EC 08 is both justified and effective.