

**Site Allocations Local Plan**

**Examination**

**Tuesday 17 October 2017, 2.00pm**

**Matter 3 – Employment**

**Forest Heath District Council's Hearing Statement**

## **Matter 3 – Employment**

### **3.1 Are the site allocations proposed by the SALP clearly justified and appropriately defined?**

- 3.1.1 The site allocations proposed for employment uses in the SALP are justified by the evidence: the Employment Land Review (ELR) (CD: C21) and the Sustainability Appraisal Report (CD: C9). The proposed employment allocations, existing general employment areas and proposed mixed use allocations are assessed in section 6 of the ELR (pages 50 to 57). As a result of this one unsustainable site was removed from the list of designated existing general employment areas (land north of Rookery Drive, Beck Row), and the others re-designated in Policy SA16. Of the two stand alone new employment site allocations the St Leger site in Newmarket SA17(b) was granted planning permission for a building of 5,598 square metres for B2/B8 use on 12 January 2017 (planning application reference DC/16/0465/FUL). The other stand alone site is the Mildenhall Academy and Dome Leisure Centre site (SA17(a)). This provides for the longer term once the existing uses have relocated to the Hub.
- 3.1.2 Policy SA16 confirms the designation of existing employment areas for B class development in line with existing uses on these sites as assessed in the ELR. Site SA17(a) Mildenhall Academy and Dome Leisure Centre is limited in size to the built footprint area of the current site and restricted to B1 uses because of its proximity to the Breckland SPA, and the policy draws attention to the need for a project level HRA.
- 3.1.3 Policy SA4 Focus of growth – Land west of Mildenhall requires provision of a minimum of 5ha of employment land, and criterion A specifies that precise numbers and the distribution of uses on the site will need to be the subject of a masterplan (see Policy DM3 on page 9 of the Joint Development Management Policies document (CD: B2)). Similarly, Policy SA10 Focus of growth – North Red Lodge indicates 8ha of employment land is to be provided on this mixed use site, and criterion A) states that “Applications for planning permission will only be determined once the masterplan for the whole site has been approved by the LPA”.
- 3.1.4 In addition to being part of a mixed use development the allocation at Red Lodge is supported by the work being carried out for the emerging Cambridge to Norwich Tech Corridor. The organisations supporting the Tech Corridor and jointly funding permanent staff to promote and develop the corridor are:

New Anglia LEP (NALEP)

Greater Cambridge Greater Peterborough Economic Partnership  
(GCGP)

Breckland District Council

South Norfolk District Council

Forest Heath District Council  
St Edmundsbury District Council  
East Cambridgeshire District Council  
Norwich Borough Council  
Norfolk county Council  
Suffolk County Council  
Cambridgeshire County Council  
Norfolk Pooled Business Rates  
Suffolk Pooled Business Rates

Red Lodge is already being promoted as one of eight development opportunities on the Cambridge Norwich Tech Corridor website [www.techcorridor.co.uk](http://www.techcorridor.co.uk) .

- 3.1.5 The B uses specified for the employment allocations in Policy SA17 are defined through available evidence, principally the need to provide an appropriate mix of sites and uses in the district (as evidenced in the ELR) and the existing locational and the environmental constraints (e.g. Breckland SPA).
- 3.1.6 In terms of the quantity of employment land required for the plan period the 2016 ELR recommends provision of somewhere between 5.3ha and 20.3ha of employment land between 2011-31 and a total of 18.6 hectares of additional employment land has therefore been allocated to accommodate the upper end of this need range.
- 3.1.7 The existing employment sites and proposed employment allocations in Policies SA16 and SA17 are clearly justified and appropriately defined and identified on the Policies Map.

**3.2 Is the overall amount of employment provision and its proposed distribution consistent with the CS? Are the proposed locations which have been identified the most appropriate when considered against all other reasonable alternatives?**

**Response**

- 3.2.1 Core Strategy Policy CS1 (CD: B57) sets out the spatial strategy for the district, and describes how it is envisaged each of the towns, key service centres, primary and secondary villages and the small settlements will grow. Parts of this policy were struck out as a result of a High Court challenge (CD: B54) including the proposed urban extensions to the three market towns and two key service centres. Since then a number of factors have intervened which have had an effect on implementation of the strategic proposals set out in the policy e.g. environmental constraints in Brandon. However, the ELR assessment of three scenarios provides a

recommendation that the council provides (through allocation of employment sites) somewhere between 5.3ha and 20.3ha of employment land. A total of 18.6 hectares of additional employment land has therefore been allocated to accommodate the upper end of this need range to reflect the need for flexibility over the plan period and aspirations for the Cambridge to Norwich (A11) Tech Corridor (in the medium to long term).

- 3.2.2 Core Strategy Policy CS6 provides for a minimum of 16 hectares of additional employment land to be allocated between 2006 and 2026. The Policy also states that "Employment development should predominantly be focused within existing settlements and on allocated sites..... The quantity and timescale of employment land development will be monitored, and the amount of land allocated for employment purposes reviewed in future development plan documents." The SALP allocates 18.6 hectares of new employment land to 2031. Existing employment areas were reassessed, and where appropriate to do so these designations were confirmed. Combining the existing employment areas in Policy SA16 with the new allocations in Policy SA17 results in the following distribution:

<b>Settlement</b>	<b>SA16: Existing employment areas</b>	<b>SA17: Employment allocations</b>	<b>Total employment land distribution</b>
<b>Brandon</b>			
	SA16(b) 1.2		
	SA16(c) 5.3		
	SA16(d) 5.9		
	SA16(e) 23.0		
Total	35.4	0	35.4
<b>Mildenhall</b>			
	SA16(k) 44.8	SA17(a) 4.0	
	SA16(l) 1.9	SA4(a) 5.0	
Total	46.7	9.0	55.7
<b>Newmarket</b>			
	SA16(m) 47.7	SA17(b) 1.6	49.3
<b>Lakenheath</b>			
	SA16(j) 6.5	0	6.5
<b>Red Lodge</b>			
	SA16(n) 3.5	SA10(a) 8.0	11.5
<b>Primary Villages</b>			
Beck Row	SA16(a) 2.0	0	
Exning	SA16(f) 0.7	0	
Kentford	SA16(g) 3.0	0	
	SA16(h) 0.9		
	SA16(i) 0.3		
West Row	0	0	
Total	6.9		6.9

- 3.2.3 The distribution accords with the spatial strategy and the criteria set out in Policy CS6.
- 3.2.4 The proposed locations for the employment allocations, both existing and new sites, are the most appropriate compared with alternatives sites and locations. The table below indicates how sites identified in the Further Issues & Options Consultation draft SALP (August 2015) either became site allocations in the Proposed Submission SALP or the reason why they were rejected. In addition, two site bids submitted as representations to the Proposed Submission SALP consultation (January to March 2017) are included at the end of the table. The Single Issue Review and Site Allocations Omission Sites document, November 2016 (CD: B10) sets out the sites considered in the SHLAA and SALP consultations. Paragraph 4.3 sets out the reasons for deferring or omitting sites. The reasons fall broadly into five categories:
1. Environmental constraints (i.e. impacts on a SPA1, SAC2, CWS3).
  2. The site is partly or wholly within a flood zone.
  3. The site is not available / deliverable / developable (either confirmed by the landowner or is in multiple ownership).
  4. The site is currently in employment use.
  5. Other available sites have a more sustainable location (as per adopted CS and JDMPD Policy).

The document notes that “sites that were included in the SALP Further Issues and Options document (2015) for one use but that have been allocated for an alternative use are included as omission sites” in the table that follows this explanation.

Site reference	Proposed Submission SALP site reference	Reason for not allocating for employment uses
B/09 Land at Station Way, Brandon	SA16(b)	
B/10 Land south west of Station Way, Brandon		SPA; Flood zone; and outside the settlement boundary
B/13 Omar Homes, Brandon	SA16(d)	
B/19 Land south of railway line including Lignacite Site, Brandon	Part SA16(c)	
B/27 Land off London Road, Brandon		SPA; CWS; SSSI; within the 72dB noise contour (Lakenheath)
M/40 Land west of industrial estate, Mildenhall	Within SA4(a)	

N/14 Land east of Newmarket, south of A14 (Hatchfield Farm)		This site is not required at this time. Other sites are available that would deliver the council's distribution of employment land.
N/18 George Lambton Playing Fields		Site is the majority of George Lambton Playing Fields – loss of community open space
L/27 Land south of Broom Road, Lakenheath		Site adjacent to SAC, CWS, LNR, and SSSI, majority of site occupies inner explosives safeguarding zone, and 72dB noise contour (Lakenheath)
L/29 Matthews Nursery, Lakenheath		Planning permission for retail and residential
K/17 Site between Bury Road and A14, Kentford		SPA buffer zone; some distance from the settlement boundary; unsustainable location; access problems. Current planning applications not yet determined (reference: DC/16/1192/OUT, DC/16/1191/FUL, DC/16/2127/OUT land at Bury Road, Gazeley)
West of Fred Dannett Road, Mildenhall	Part SA16(l)	
Part RL/15 Land north and east of Red Lodge, both sides of A11  'Star site' west of Red Lodge (Preferred Options 2016)		Very large greenfield site - sufficient land allocated at Red Lodge in this plan. A11 site access constraints. Note: Cambridge to Norwich A11 corridor identified as the focus for identifying new employment sites for the Joint West Suffolk Local Plan which is due to commence preparation in 2018. The council will continue to work with its neighbours to seek infrastructure improvements (particularly to improve the east to west/north to east link to/from the A11 and A14), attract investment and promote the area.
<b>Sites submitted as representations to the Proposed Submission SALP consultation (Jan - March 2017)</b>		
Rep. no: 24716 Land to the east (off) A11, Herringswell Road, Barton Mills.		This greenfield site of 25 hectares is in the countryside between the settlements of Red Lodge and Barton Mills. It is in an unsustainable location.

		This is not considered to be a reasonable alternative site (see comments for 'Star site' above).
<p>Rep. no: 24735 Land adjoining Fiveways Roundabout, Barton Mills</p> <p>This is Site M/26 in the Further Issues &amp; Options SALP August 2015 (Land south of Bury Road and east of A11) as a residential site and shown as 'deferred – SPA and flooding'.</p>		<p>This rep. follows a SHLAA bid and Further Issues &amp; Options rep. for residential use on site M/26. This was deferred because of the SPA designation and flood risk constraints.</p> <p>Rep. no. 24735 was submitted as an alternative site for B1/B2/B8 uses.</p> <p>Although this is a brownfield site it is not considered to be a sustainable location (too distant from Mildenhall). It is adjacent to the Breckland Forest SSSI, which is a component of the Breckland SPA and within the SPA buffers. Development of the site would advance the line of development toward the SPA. The site is within Flood Zones 2 and 3.</p> <p>It is not considered to be a reasonable alternative site.</p>

### **3.3 Has sufficient land been identified to meet the short and long term employment needs of the district?**

- 3.3.1 The Forest Heath Employment Land Review, October 2016 (CD: C21) provides an up-to-date evidence base relating to current and future requirements for B class employment space in the district to the end of the plan period. The methodology used conforms to the requirements of the NPPF and the PPG and is based on a range of scenarios for how the economy could change in the future and looks at the employment space and land implications of uses classes B1 (offices, research and development and light industrial), B2 (general industrial), and B8 (storage and distribution). The planning requirement for the district is set out in paragraphs 7.66 to 7.68 (page 72) and a synthesis and conclusions to section 7 (Future Requirements for Employment Space) is provided in paragraphs 7.72 to 7.79 (pages 73 and 74). The recommendation of the ELR work is set out in paragraph 7.78 which is that "the Council consider planning to accommodate at least the labour supply based requirement (scenario 3) to ensure that the District's indigenous growth potential (i.e. arising from its resident workforce is not constrained by lack of spatial capacity in future."
- 3.3.2 The labour supply scenario (Table 7 of the ELR on page 72) suggests 5.3ha for all B use classes (applying a 10% buffer). The A11 growth corridor higher jobs growth scenario suggests 20.3ha (applying a 10% buffer). The Council consider it appropriate to plan for a requirement at

the upper end of the ELR range (i.e. nearer 20.3ha than 5.3ha), and has therefore allocated 18.6ha of land within the SALP. It is considered that this provides flexibility in terms of use classes within Policy SA17 that will help when it comes to meeting market needs in the short and long term.

- 3.3.3 Consideration has been given to the likely timescales associated with the different allocations and when they are anticipated to come forward for employment development. For example, the 2016 ELR notes that there are inherent risks associated with the Mildenhall Academy and Land North of Acorn Way, Red Lodge sites coming forward over the short term, while Land West of Mildenhall and St. Ledger represent comparatively more suitable locations for shorter term development, for example through extensions of existing adjoining employment sites. This is shown in the following table:

Ref	Site	Phasing
SA17(a)	Mildenhall Academy & Dome Leisure Centre site, Mildenhall	Long term
SA17(b)	St Leger, Newmarket	Short/Medium term
SA4(a)	Land west of Mildenhall	Medium/long term
SA10(a)	Land north of Acorn Way, Red Lodge	Medium/long term

This demonstrates a 'phased' approach to employment delivery over the plan period.

- 3.3.4 The SALP allocates 5.6ha of employment land on "stand alone" sites at Mildenhall and Newmarket, and a further 13ha of employment land on mixed use sites at Mildenhall and Red Lodge. This combination of site allocations across the B use classes is sufficient to meet the short, medium and long term employment needs of the district.

### **3.4 Are all the allocated sites deliverable?**

- 3.4.1 The new sites allocated in Policy SA17 comprise two "stand-alone" sites at Mildenhall (SA17(a)) and Newmarket (SA17(b)), and two areas of employment land within mixed-use allocations at Mildenhall (SA4(a)) and Red Lodge (SA10(a)):

- SA17(a) This site will become vacant and available for development when the academy and leisure centre currently occupying the site move to the proposed Public Services Hub (the Mildenhall hub which is part of site SA4(a) land west of Mildenhall). The Public Service Hub benefits from an adopted Development Brief (CD: B20). This site has an existing entrance onto the A1101, is close to the A11 and is served by multiple bus routes. This site provides a new location for a modern business park type of development. This is a visually attractive site in a sustainable location close to the A11 with few constraints, and there are no indications that it is not deliverable within the plan period, albeit in the longer term.



- SA17(b) Planning permission was granted for a building of 5,598 square metres for B2/B8 use on 12 January 2017 (planning application reference DC/16/0465/FUL) on this site. This suggests that there is active market demand for employment development on the site, and can be delivered in the short to medium term.
- SA4(a) This is part of the mixed use allocation on an area of 97ha where the allocation requires residential development (1300 dwellings), a local centre, a minimum of 5ha of employment land, schools, leisure facilities and public services. A detailed masterplan is required. The Mildenhall Hub falls within this wider site and already benefits from an adopted Development Brief (CD: B20). The Employment Land Review (ELR CD: C21) describes the existing industrial estate (Policy SA16(k)) in paragraphs 6.31 and 6.32, and notes "Whilst this is a strong employment location, most of the current plots are built out and expansion opportunities appear to be limited ....". This accords with evidence of businesses in this area (to the north east of site SA4(a)) wanting to expand, and sufficient interest in Mildenhall from businesses seeking premises to be confident that 5 hectares of employment land will be deliverable in the plan period.
- SA10(a) this is part of a mixed use urban extension to the north of Red Lodge, and Policy SA10 requires prior approval of a masterplan to include 8 hectares of employment land. The western side of the site is allocated in the Red Lodge Masterplan (1998) (CD: B60) for employment and business uses, and a distribution warehouse has been built (and is in use) in the centre of the site. The site has excellent access to the A11. Whilst there are constraints to development set out in Policy SA10 there is no evidence that this site is not deliverable in the longer term within the plan period.

### 3.5 Have all the alternative sites put forward been subject to a sustainability appraisal?

3.5.1 The following table outlines those alternative sites that were specifically submitted for consideration as employment allocations (full or as part of a mixed-use development) during the plan-making process. The first column uses Site Reference numbers from the Further Issues and Options consultation draft of the SALP (August 2015) CD: B42, and if allocated the SALP reference number is included in the third column. The Sustainability Appraisal of the Site Allocations Local Plan (Interim Report) Further Issues and Options, August 2015, CD: B43 included all the sites in the first column.

Site Reference (SALP Further Issues & Options 2015)	Address	Included in the SA? + SALP reference number if appropriate.

B/09	Station Way, Brandon	Yes. SA16(b)
B/10	Land south west of Station Way, Brandon	Yes. Not allocated – Flood Zone and SPA
B/13	Omar Homes – Land south of London Road, Brandon	Yes – SA16(d)
B/19	Land south of railway line, Brandon	Yes. SA16(c)
B/27	Land off London Road, Brandon	Yes. SA16(e)
M/40	Land west of Industrial Estate, Mildenhall	Yes. The site forms part of allocated site SA4(a) which is included within the SA.
N/14	Hatchfield Farm, Newmarket	Yes. This site was considered as part of a spatial strategy option within the SIR SA Report (January 2017).  The site N/14 was assessed within the Interim SA Report (August 2015) (B43)  The site N1(c) mixed use site (previously N/14) was assessed within the Interim SA Report (April 2016) (B27) that accompanied the Preferred Options SALP April 2016.
N/18	George Lambton Playing Field, Newmarket	Yes.
L/27	Land south of Broom Road, Lakenheath	Yes
L/29	Matthews Nursery, Lakenheath	Yes. SA7(a)
K/17	Site between Bury Road and	Yes

	the A14, Kentford	
N/A	Land to the west of Fred Dannatt Road	Yes
'Star site'	West of the A11, Red Lodge	The site forms part of site RL/15b which was included within the SA.

### 3.5.2 The SALP Sustainability Report (SA) (CD: C9) notes in paragraph 6.1.2:

"The Council has given consideration to whether only sites 'included' by the SHLAA should be the focus of detailed consideration (appraisal and consultation) at the current time. The conclusion has been reached that it is appropriate to keep deferred sites 'in the mix'. Through discussion it was identified that many of the sites 'deferred' through the SHLAA (on the basis of quite rigid decision rules; e.g. on the basis of encroaching a distance buffer zone around a sensitive feature) could potentially be brought forward as there is the potential for constraints to be overcome (or for development to secure, or help secure through development in combination with other sites, benefits that outweigh negative effects)."

and in paragraph 6.1.4:

"The outcome is that it is appropriate to appraise (as 'reasonable site options') all SHLAA sites (i.e. regardless of whether they are included or deferred) with the exception of:

- Sites below 10 dwellings (based on 30 dwellings per hectare, dph);
- Sites which have commenced or are completed; and
- Sites not attached to a settlement or in the smaller villages."

(The appraisal methodology for site options is set out in paragraphs 7.2.1 and 7.2.2).

### 3.5.3 The Omission Sites document Nov 2016 (CD: B10) in paragraph 4.2 notes: "Omitted sites are those that were subject to further consideration for their suitability as allocations within the SALP. They are those sites that the development of which could have been expected to offer some level of benefit to counteract or offset any negative impacts associated with sustainability. Omitted sites, as presented in this document, were considered alongside the allocated sites within the SALP as reasonable alternatives."

### 3.5.4 Although proposed land uses are outlined within the SA, the approach of the SA allows the assessment of each site to be explored for either employment or residential allocation. The SA assessed all sites on a level playing field, with no assessment criteria utilised that were specific to either housing or employment related development; the SA explores the broad sustainability of each included site for development purposes. In

this way, the SA has informed the Council's site selection process for both housing and employment uses in preparation of the SALP.