

**Independent Examination Forest Heath District Council  
Site Allocations Local Plan**

**Matter 3 – Employment Hearing Statement**

**Response on behalf of :-  
Taylor Farms**

**October 2017**

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## 1.0 Introduction

- 1.1 This Hearing Statement responds to Forest Heath Site Allocations Local Plan (FHSALP) Examination Matter 3 in relation to Employment. Taylor Farms has previously raised objections to the Council's approach to allocating sites to meet the District's Employment requirements over the Plan period to 2026 and the omission of Taylor Farm's site at Barton Mills. This submission draws on these previous submissions along with our Employment Land Supply Critique enclosed at **Appendix 1** to respond directly to the questions raised by the Inspector within the Matters and Issues. These are addressed in turn below.

## 2.0 Responses to Inspectors Questions

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

- 2.1 We note that the Proposed Submission Site Allocations Local Plan is highly reliant on a number of Mixed-Use allocations to deliver the level of employment land proposed within the Plan and meet the requirements of Core Strategy Policy CS 6. However, in each case, it is evident that the location and physical extent and location of employment land and its relationship with residential uses is not clearly defined on the Policies Maps or elsewhere. As such, the ability of these Mixed Use allocations to accommodate B2 and B8 uses without adversely impacting on nearby residential uses (both existing and proposed) is uncertain and undermines the confidence in the Site Allocations Local Plan's ability to provide sufficient employment land to meet objectively assessed needs and the requirements of Core Strategy Policy CS 6 over the Plan period.

### **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?**

- 2.2 Taylor Farms has concerns with regard to the overall amount of employment provision and its distribution proposed within the Proposed Submission Site Allocations Local Plan and consider that this is not fully consistent with the Core Strategy.
- 2.3 Core Strategy Policy CS 6 aims to deliver a minimum of 7,300 additional jobs during the period 2006 to 2026 and provide a minimum of 16 hectares of additional employment land for business (B1), general industrial (B2), and distribution (B8) uses to help deliver this and achieve a mix and range of sites and a balanced economy. Policy CS6 goes on to confirm that the primary location for strategic employment growth will be:
- Newmarket (approximately 5 hectares);
  - Mildenhall (approximately 4.5 hectares);
  - Brandon (approximately 2 hectares);

- Growth at Lakenheath and Red Lodge growth will be in broad alignment with the scale of housing development in each of these settlements to discourage commuting and achieve a homes / jobs balance.

- 2.4 Whilst the Site Allocations Local Plan proposes 18 hectares of additional employment land over the Plan period, this amount falls slightly below the requirements of the A11 Growth Corridor scenario considered within the Council's 2016 Employment Land Review document (Document Reference C21) and fails to allow for factors such as delays in sites coming forward, an allowance for replacement of ongoing losses of employment space during the Plan period and other changes in circumstance or unexpected market requirements over the Plan period. Further detailed analysis of the Council's employment land position can be found within the attached Employment Land Supply Critique enclosed at Appendix 1 to these representations. As such, the proposed level of employment land proposed would not be able to meet objectively assessed needs with sufficient flexibility to respond to rapid change as is required by paragraph 14 of the NPPF.
- 2.5 In addition, the level of employment land proposed and the extent of B class floorspace it would deliver would not be sufficient to help the Council achieve the jobs growth target within Core Strategy Policy CS 6 of 7,300 additional jobs. It is evident from Table 7.5 of the Council's 2016 Employment Land Review that, even on the high growth A11 Growth Corridor Scenario, there would only be net job growth of 3,685 jobs over the period 2011-2031 across all sectors, with only 1,305 additional B Class jobs created. This is clearly therefore insufficient to meet the Core Strategy jobs growth target set out in Policy CS 6.
- 2.6 Moreover, of the 18 hectares of additional employment land proposed on employment and mixed-use allocation sites that are identified within the Site Allocations Local Plan, half of this is proposed to be accommodated at Mildenhall, with only 1.6 hectares at Newmarket. Whilst 8 hectares of land is allocated on land North of Acorn Way, Red Lodge, this is a long-term mixed-use allocation and the nature of the employment uses it is able to accommodate will be restricted by the need to minimise impacts on residential amenity for both existing and proposed properties.
- 2.7 In summary therefore, we conclude that the extent and location of employment sites identified under Policy SA17 of the Site Allocations Local Plan is not fully consistent with Policy CS 6 of the Core Strategy and is therefore not justified and is unsound.

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

- 2.8 Taylor Farms has concerns with regard to the overall amount of employment land provision within the Site Allocations Local Plan and considers that this is not sufficient to meet the short and long term need for employment across the District with sufficient flexibility to respond to rapid change as required by paragraph 14 of the NPPF.
- 2.9 As noted above, Core Strategy Policy CS 6 aims to deliver a minimum of 7,300 additional jobs during the period 2006 to 2026 and provide a minimum of 16 hectares of additional employment land for business (B1), general industrial (B2), and distribution (B8) uses to help deliver this and achieve a mix and range of sites and a balanced economy.

- 2.10 Whilst the Proposed Submission Site Allocations Local Plan proposes 18 hectares of additional employment land over the Plan period, this amount falls slightly below the requirements of the A11 Growth Corridor scenario considered within the Council's 2016 Employment Land Review document and fails to allow for factors such as delays in sites coming forward, an allowance for replacement of ongoing losses of employment space and other changes in circumstance or unexpected market requirements over the Plan period.
- 2.11 In this regard, the Annual Monitoring Report 2014/15 (Ref. B32) highlights that in the year 2014/2015 there was a net loss of employment floorspace. Due to the permitted development rights which allow the conversion of office space to residential use, there is a danger that this trend could continue and new employment space will need to come onto the market to address this loss. As such, the Annual Monitoring Report sets a target for there to be no loss in employment space.
- 2.12 As such, it is considered that the proposed level of employment land proposed would not be able to meet objectively assessed needs with sufficient flexibility to respond to rapid change as is required by paragraph 14 of the NPPF.
- 2.13 In addition, the level of employment land proposed and the extent of B class floorspace it would deliver would not be sufficient to help the Council achieve the jobs growth target within Core Strategy Policy CS 6 of 7,300 additional jobs. It is evident from Table 7.5 of the Council's 2016 Employment Land Review document that, even on the high growth A11 Growth Corridor Scenario, there would only be net job growth of 3,685 jobs over the period 2011-2031 across all sectors, with only 1,305 additional B Class jobs created. This is clearly therefore insufficient to meet the Core Strategy jobs growth target set out in Policy CS 6.
- 2.14 It is also evident from the detailed assessment of sites at Appendix 7 of the Council's 2016 Employment Land Review that all of the proposed employment sites identified within the Site Allocations Local Plan are 'Long Term' opportunity sites which will take time to come forward. In a number of instances, the employment sites form part of wider mixed-use allocations (site SA4(a) Land West of Mildenhall and site SA 10(a) Land north of Acorn Way, Red Lodge). These two allocations form approximately 70% of the proposed employment land identified within the Site Allocations Local Plan and will need to be brought forward as comprehensive masterplanned proposals which will take time to deliver, notwithstanding any viability concerns. This therefore calls in to question whether they could be delivered such that they could meet employment needs in the Plan period to 2026. It is also clear, that in the absence of sites available in the Short to Medium term, the Plan is unable to provide for short term employment needs in the District.
- 2.15 With specific regard to meeting future needs for warehouse and industrial uses, as our Employment Land Critique enclosed at **Appendix 1** demonstrates, there are clear indications that there is a need for further industrial and warehouse floorspace within the District with identified demand specifically for the A11 Corridor. This is likely to become more acute in the next few years as existing sites are occupied and whilst a number of the longer-term employment sites take time to come forward. This will also be exacerbated by growth in the logistics and distribution sector driven by e-commerce and the need for more local distribution hubs with the A11 Corridor being a key focus for regional activity to serve Norfolk and Suffolk.
- 2.16 In summary therefore, we conclude that insufficient employment land has been allocated under Policy SA17 in order to meet both short and long terms needs within the Plan period for the range of different employment requirements with sufficient flexibility to respond to rapid change.

Consequently, it is considered that the Policy is not positively prepared, not justified and is not consistent with National Policy. Policy SA17 is therefore unsound.

### **3.4 Are all the Allocated Sites Deliverable?**

- 2.17 Whilst Taylor Farms have no comments on the overall deliverability of individual sites in general terms, they are concerned with regard to whether the employment sites identified are capable of being delivered within the Plan period to 2026. All of the proposed employment sites identified as considered within the Employment Land review document as being 'Long Term' opportunities. This is particularly the case for those employment sites which form part of wider mixed-use allocations (site SA4(a) Land West of Mildenhall and site SA 10(a) Land north of Acorn Way, Red Lodge). These two allocations will need to be brought forward as comprehensive masterplanned proposals which will take time to deliver, notwithstanding any viability concerns. This therefore calls in to question whether they could be delivered such that they could meet employment needs in the Plan period to 2026.

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

- 2.18 No Comment

## 3.0 Conclusion

- 3.1 In summary therefore, Taylor Farms conclude that insufficient employment land in the right places has been allocated under Policy SA17 in order to address the requirements of Policy CS 6 of the Core Strategy and meet the range of different employment needs within the Plan period (including both short term and long-term needs) with sufficient flexibility to respond to rapid change. Consequently, it is considered that the Policy is not positively prepared, not justified and is not consistent with National Policy. The Policy is therefore unsound.
- 3.2 Taylor Farms therefore consider that additional employment sites should be allocated within the Site Allocations Local Plan to meet employment needs over the Plan period to 2026. Taylor Farms consider that their land off the A11 at Herringswell Road, Barton Mills is ideally placed to meet these needs being a deliverable greenfield site with no insurmountable barriers to delivery. Given the size of the site and its greenfield nature, the site is capable of meeting both short and long-term employment needs in the District over the Plan period and beyond, particularly with regard to warehouse and distribution uses and would help the Council to meet the Core Strategy jobs growth target. The site is considered to be both suitable and deliverable. The site should therefore be included in Policy SA17 as Land off A11 and Herringswell Road, Barton Mills and identified for B1(c) B2 and B8 uses.

## APPENDIX 1

# BIDWELLS' FOREST HEATH EMPLOYMENT LAND CRITIQUE

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Land at Herringswell Road, Barton Mills  
Taylor Farms  
Bidwells LLP  
October 2017



# FOREST HEATH EMPLOYMENT LAND CRITIQUE

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# 1.0 Introduction

## Background

- 1.1 Bidwells LLP have been instructed by Taylor Farms Ltd to consider the employment land supply and demand position in Forest Heath in support of the promotion of land off the A11 at Herringswell Road, Barton Mills for employment development.
- 1.2 Representations have previously been submitted to the Forest Heath Proposed Submission Site Allocations Local Plan objecting to Policy SA17 which sets out the proposed employment allocations for the District for the Plan period to 2026.
- 1.3 This report seeks to support the representor's Hearing Statement in response to Matter 3 in relation to Employment as part of the Examination of the Forest Heath District Council Site Allocations Local Plan.

## Land off A11 Herringswell Road, Barton Mills

- 1.4 Land off A11 at Herringswell Road, Barton Mills, comprises 25 hectares of land located on the east side of the A11 between Red Lodge and the Barton Mills roundabout. The site is located immediately adjacent to the A11 Trunk Road, approximately 1 mile north west of Red Lodge and 1 mile south of Mildenhall.
- 1.5 The site is divided in two by Herringswell Road, the northern parcel comprises 9.94 hectares of land and the southern parcel comprises approximately 15.06 hectares. A plan indicating the potential allocation site on Land off A11 at Herringswell Road is attached at **Appendix 1**.
- 1.6 As part of pre-application enquiries, the Highways Agency confirmed that, to service future development from Herringswell Road, a flyover would not be required and a roundabout would be acceptable in this location.
- 1.7 The land has been put forward as an employment allocation for B1, B2 and B8 uses but would be particularly suitable for industrial and warehouse development. A portion of the site could also be devoted to start up units to allow home businesses to expand and grow.
- 1.8 Given the site's location between the key settlements at Mildenhall and Red Lodge, and adjoining the A11 Trunk Road it is considered that the site is ideally situated for employment development and for distribution and warehouse uses in particular.

## 2.0 Policy Context

### National Policy and Guidance

- 2.1 The National Planning Policy Framework (NPPF) makes clear that “the purpose of the planning system is to contribute to the achievement of sustainable development” (paragraph 6) and that there are three dimensions to sustainable development: economic, social and environmental (paragraph 7). Paragraph 7 continues by stating that “these dimensions give rise to the need for the planning system to perform a number of roles”. The economic role is defined as “contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure”.
- 2.2 Paragraph 14 confirms that at the heart of the NPPF is “*a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:*
- *local planning authorities should positively seek opportunities to meet the development needs of their area:*
  - *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
    - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*
    - *specific policies in this Framework indicate development should be restricted” (emphasis added).*
- 2.3 This approach is reiterated in Paragraph 151, which states that “*Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development*”.
- 2.4 Paragraph 17 requires that “*within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking*”. Twelves principles are set out, including, that planning should “*proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities*” (emphasis added).
- 2.5 With specific regard to economic development, Paragraph 19 makes clear that “*the government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system*” (emphasis added).

- 2.6 Paragraph 21 goes further by stating that “*planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing*”.
- 2.7 With specific regard to Plan making, Paragraph 154 of the Framework requires that Local Plans should be “*aspirational but realistic*” while Paragraph 161 requires that local planning authorities should “*use their evidence to ensure the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land.*”

## Forest Heath Core Strategy

- 2.8 Core Strategy Policy CS 6 ‘Sustainable Economic and Tourism Development’ aims to deliver a minimum of 7,300 additional jobs in the District by 2026. In order to help achieve this objective, the policy requires the provision of a minimum of 16 hectares of additional employment land for the period 2006 and 2026 to provide business (B1), general industrial (B2), and distribution (B8) uses to achieve a mix and range of sites and a balanced economy.
- 2.9 Policy CS 6 goes on to confirm that the primary location for strategic employment growth will be:
- Newmarket (approximately 5 hectares);
  - Mildenhall (approximately 4.5 hectares);
  - Brandon (approximately 2 hectares);
  - Growth at Lakenheath and Red Lodge growth will be in broad alignment with the scale of housing development in each of these settlements to discourage commuting and achieve a homes / jobs balance.
- 2.10 The policy goes on to state that employment sites will be identified in the Site Allocations Development Plan Document, and will be assessed against the following criteria:
- The District’s Spatial Strategy, in terms of distribution and scale, the size of settlement and housing growth proposed.
  - The need to make the best use of previously developed land.
  - The need to conserve and enhance the District’s natural assets and cultural heritage including landscape character and the setting of settlements.
  - Infrastructure capacity.
  - Physical constraints.
  - Market demand, availability and deliverability.
  - Access to the primary route network.
  - Access to public transport, cycle and walking networks, and key services and facilities.
  - Access to the A11 / A14 and main trunk road network for warehouse and distribution allocations.
  - The sequential test for new office development.

- Biodiversity constraints.

## Employment Evidence Base

### Forest Heath Employment Land Review

- 2.11 The Forest Heath Employment Land Review produced by Nathaniel Lichfield and Partners (NLP) in Oct 2016 provides the main source of evidence for employment uses as part of the Council's Local Plan evidence base. The document provides a review of employment requirements for the District up to 2031 along with a review of the Council's existing and proposed employment land supply having regard to the guidance within the Planning Practice Guidance.
- 2.12 The Employment Land Review seeks to project likely employment needs over the period to 2031 based on 3 potential growth scenario:
- East of England Forecasting Model (EEFM) 'Baseline' Job Growth Scenario;
  - A11 Growth Corridor Job Growth Scenario;
  - Labour Supply based Job Growth Scenario.
- 2.13 The overall net floorspace requirements that have been estimated under the three scenarios range from -8,280sq.m under the EEFM baseline job growth scenario to 94,050sq.m under the A11 Growth Corridor job growth scenario over the 20-year period to 2031. This implies in broad terms a need for between -3.3ha and 18.4ha of employment land in net terms.
- 2.14 The majority of this spatial requirement relates to office (B1a/b) uses. However, when a 10% buffer margin is applied to provide an illustration of indicative gross land requirements the requirements increases this range to between -3.1ha and 20.3ha.
- 2.15 The outputs from these assessment scenarios are summarised below.

**Table 1: ELR Employment Land Forecasts**

	EEFM BASELINE	A11 GROWTH CORRIDOR	LABOUR SUPPLY
Job Growth (All Sectors)	2,450	3,685	7,240
Job Growth (B Class)	70	1,305	1,860
Net Floorspace(m2)	-8,280	94,050	28,740
Net Land Requirements (ha)	-3.3	18.4	4.8
Gross Land Requirements (ha)	-3.1	20.3	5.3

- 2.16 Whilst it is acknowledged that the assessment period for the ELP does not fully align with the Core Strategy period, it should be noted that none of these scenarios reflects the Core Strategy jobs growth target. It is considered that this represents a fundamental flaw in the ELR in that it

seeks to establish needs based on trends without having sufficient regard to the aspirations of the Core Strategy.

### **A11 Growth Corridor Feasibility Study**

- 2.17 The A11 Growth Corridor Feasibility Study was commissioned in 2015 by Forest Heath District Council in partnership with Breckland and South Norfolk District Councils. The Study was commissioned to investigate the economic growth potential of the A11 Corridor, having been identified as one of four growth corridors within the New Anglia Local Economic Partnership (LEP) area. The Study, which was undertaken by Bruton Knowles, was published in June 2016 and highlighted the significant potential of the Corridor following the dualling of the A11 linked to the specialisms and research around bio-science and pharmaceuticals in and around Cambridge and Norwich.
- 2.18 The aims of the study included:
- To secure substantial economic growth within the A11 corridor with a focus on advanced manufacturing and engineering and agri-tech, together with wider target sectors and other opportunities of Importance to the local economy;
  - To align employment growth with a significant increase in housing accommodation within the A11 Corridor;
  - To support the ambitions of the Growth Deals for Greater Norwich and Greater Cambridge and wider growth policy framework including opportunities for capturing spill-over effects where this will increase overall economic benefits; and
  - To make the A11 Corridor a recognised location for investment activity in order to support and add value to the wider sub-regional offer.
- 2.19 Whilst the focus of growth within the Corridor is advanced manufacturing and engineering and agri-tech, the report notes that these sectors are on their own unlikely to deliver the Councils' employment aspirations and that *"analysis of sector growth prospects and feedback from local property professionals and New Anglia and Greater Cambridge Greater Peterborough LEAs and the Norfolk and Suffolk Chambers of Commerce suggest that other sectors, particularly ICT, life sciences, energy and logistics should also be targeted."*
- 2.20 Paragraph 6.11 of the Site Allocations Local Plan acknowledges this potential for economic development in the Greater Cambridge/A11 Corridor area is an important driver for future growth in the District and noted that to exploit these advantages the Council needs to have sufficient employment land allocated in order to attract potential business re-locating from Greater Cambridge or inward investment looking to move into the area. Despite these conclusions, it is evident from the text and the Council's approach to the allocation of employment sites that it is seeking to defer such decisions until the next Local Plan review.

## 3.0 Supply of Employment Land

- 3.1 Both Policy SA17 of the Proposed Submission Site Allocations Local Plan and the Council's 2016 Employment Land Review provide a summary of existing and proposed employment sites. The existing employment land provision is summarised in the Table below.

**Table 2: Existing Employment Sites**

LOCATION	SITE DESCRIPTION	SIZE (HA)	PROPORTION
Newmarket	Northern Industrial Estate	47.7	
	<b>Sub Total Newmarket</b>	<b>47.7</b>	<b>32.5%</b>
Mildenhall	Northern Industrial Estate	44.8	
	Extension to Industrial Estate	1.9	
	<b>Sub Total Mildenhall</b>	<b>46.7</b>	<b>31.8%</b>
Brandon	Land at Station Way	1.2	
	Land south of Railway Line	5.3	
	Land south of London Road	5.9	
	Land south Mile End	23	
	<b>Sub Total Brandon</b>	<b>35.4</b>	<b>24.1%</b>
Lakenheath	Land North of Station Road	6.5	
	<b>Sub Total Lakenheath</b>	<b>6.5</b>	<b>4.4%</b>
Red Lodge	North of Red Lodge	3.5	
	<b>Sub Total Red Lodge</b>	<b>3.5</b>	<b>2.4%</b>
Kentford	Land south of Bury Road, Lanwades Business Park	3	
	Land south of Gazeley Road	0.9	
	Land south of Bury Road	0.3	
	<b>Sub Total Kentford</b>	<b>4.2</b>	<b>2.9%</b>
Other	Land south of Swan Lane, Exning	0.7	
	Land east of Mildenhall Drove, Beck Row	2	
	<b>Sub Total Other</b>	<b>2.7</b>	<b>1.8%</b>
<b>TOTAL</b>		<b>146.7</b>	<b>100%</b>

- 3.2 It can be seen from the above that, whilst there is a significant amount of existing employment land within the District, there is little in the way of existing sites within immediate proximity of the A11 suitable for industrial and distribution uses with sites at Mildenhall located on the other (north western) side of the town and sites at Red Lodge subject to restrictions on B2 / B8 development as a result of their proximity to existing and proposed residential development.
- 3.3 With regards to proposed employment sites within the Proposed Submission Site Allocations Local Plan, only a limited number of new sites are proposed with a number of sites originally proposed in the emerging Plan having been deleted. These include land at Approach to Red Lodge – Employment allocation for 4.1 hectares which was deleted due to permission being granted for residential development.
- 3.4 As a result, the Proposed Submission Site Allocations Local Plan now only proposes 18ha of additional employment land. In addition to the proposed allocations, there is a further limited



source of pipeline supply in the form of outstanding planning permissions for B class development comprise just 16% of the total pipeline supply, equivalent to 3.4ha in total.

- 3.5 The remaining proposed new employment allocations within the Site Allocations Local Plan are summarised in the table below.

**Table 3: Proposed Employment Sites**

SITE DESCRIPTION	SIZE (HA)	USE	PROPORTION	COMMENTS
St Leger	1.6	B2/B8		Long Term
<b>Sub Total Newmarket</b>	<b>1.6</b>		<b>8.6%</b>	
Mildenhall Academy / Dome Leisure Centre	4.0	B1		Constrained Site, Long Term
Land West of Mildenhall	5.0	B1/B2/B8		Part of Mixed Use allocation Long Term
<b>Sub Total Mildenhall</b>	<b>9.0</b>		<b>48.4%</b>	
Land north of Acorn Way	8.0	Unspecified		Part of Mixed Use Allocation, Long Term
<b>Sub Total Red Lodge</b>	<b>8.0</b>		<b>43.0%</b>	
	<b>18.6</b>		<b>100</b>	

- 3.6 Whilst the level of provision proposed within draft Policy SA17 meets the minimum requirement of 16 hectares set out within Core Strategy Policy CS 6, this leaves little in the way of flexibility to respond to rapid change as required by paragraph 14 of the NPPF or to account for the continuing loss of employment land across the District. In this regard, the 2014/15 Annual Monitoring Report in the year 2014/2015 identifies that there was a net loss in employment land in that monitoring year. Due to the permitted development rights which allow the conversion of office space to residential use there is a risk that this trend could continue and new employment space will therefore need to come onto the market to address this loss. As such, the Annual Monitoring Report sets a target for there to be no loss in employment space.
- 3.7 It is also evident from the detailed assessment of sites at Appendix 7 of the Council's 2016 Employment Land Review that all of the Proposed Employment Allocation Sites within the Local Plan are regarded as having 'long term' potential due to various development constraints meaning it is unlikely that these will come forward in the short to medium term. In a number of instances, the employment sites form part of wider mixed-use allocations (site SA4(a) Land West of Mildenhall and site SA 10(a) Land north of Acorn Way, Red Lodge). These two allocations form approximately 70% of the proposed employment land identified within the Site Allocations Local Plan and will need to be brought forward as comprehensive masterplanned proposals which will take time to deliver, notwithstanding any viability concerns. This therefore calls in to question whether they could be delivered such that they could meet employment needs in the Plan period to 2026. This is a major source of concern, particularly given the very limited pipeline supply available from sites with planning permission.
- 3.8 In this context, it is worth noting that page 84 of the ELR notes that:

*"Beyond this identified supply, current levels of vacant employment space being marketed do not appear particularly excessive against the 'normal' market vacancy rate of 10% to enable churn and choice (in fact vacancy levels within the District's B class stock are currently reported to be*

*lower than 10%) and no surplus capacity in terms of existing vacant floorspace has been added to the supply position.”*

- 3.9 The combination of limited surplus industrial stock currently available along with limited short to medium term pipeline employment supply risks leading to insufficient land being available to meet business needs in the Short to Medium term such that businesses are forced to consider alternative locations outside the District or other options including limiting expansion.
- 3.10 Moreover, of the 18 hectares of additional employment land proposed on employment and mixed-use sites that are identified within the Site Allocations Local Plan, half of this is proposed to be accommodated at Mildenhall, with only 1.6 hectares at Newmarket. Whilst 8 hectares of land is allocated on land North of Acorn Way, Red Lodge, this is a long-term mixed-use allocation and the nature of the employment uses it is able to accommodate will be restricted by the need to minimise impacts on residential amenity for existing and proposed properties.
- 3.11 It is also evident that the proposed level and distribution of the employment allocations fails to take advantage of the opportunities now presented by the dualling of the A11 enhancing the strategic road accessibility of the area and the ambitions for the A11 Growth Corridor set by the New Anglia LEP and highlighted within the A11 Growth Corridor Feasibility Study.

## 4.0 Demand for Employment Floorspace

- 4.1 The 2016 Employment Land Review provides evidence and commentary in respect of the demand for further employment space within the District. Whilst overall, the ELR suggests there is a reasonable level of supply to meet future needs and demand over the Plan period, this conclusion is drawn largely based on the various forecasts for jobs growth rather than market demand and requirements for further employment land and premises.
- 4.2 Moreover, this also masks a divergent picture in terms of the demand and supply balance with limited demand and oversupply within the office sector but higher levels of demand and lower levels of supply in the warehouse and distribution sector. In this regard, whilst now out of date, it is nonetheless noting that the Council's 2009 Employment Land Review concluded that there was an oversupply of approximately 21 ha of office land and a deficit of approximately 20 hectares of industrial land.
- 4.3 Of particular note, with regard to warehouse and distribution uses, page 21 of the 2016 AMR notes that *"Forest Heath contains a smaller quantity of factory and warehouse floorspace than each of its neighbouring local authorities although the District's stock of commercial office space is similar in scale to nearby areas."* This further highlights the relatively limited supply for such uses in the local market.
- 4.4 Page 26 of the document goes on to highlight that *"Against the backdrop of limited existing stock, occupiers increasingly have to consider 'Design & Build' opportunities along the corridor or pre-lets of new space."*
- 4.5 With specific regard to industrial and warehousing development, page 26 of the document goes on to note that:
- "the Economic Development team at Forest Heath District Council report that they have had a number of active enquiries for industrial/commercial land along the A11 corridor, specifically for sites around 10 acres/4ha in size that are suitable for manufacturing and waste uses, located away from incompatible uses such as housing and ideally with 24-hour access and operations."*
- 4.6 Similarly, in respect of the potential for further employment development in the A11 Corridor, page 27 of the ELR goes on to conclude that:
- "In light of Forest Heath's location within the wider Cambridge property market area, local property agents believe that further demand could arise towards the southern end of the A11 Corridor from industrial occupiers that cannot find suitable opportunities in the more constrained Cambridge market or are seeking lower rental levels."*
- 4.7 In terms of warehousing and distribution, accessibility is the key locational factor. Small scale local distribution and trade counter operators require population centres close by whereas larger regional distribution businesses seek highly accessible locations close to trunk road and motorway intersections. Locations along the A11 and A14 are likely to be suitable for larger distribution development including Thetford, Mildenhall, Newmarket and Red Lodge would all be suitable locations for such development, a number of the existing and proposed employment sites within these locations are either located away from the A11 and/or in close proximity to

residential development where the nature of employment development and their activities is restricted by the need to protect residential amenity.

- 4.8 For instance, we are aware of interest being received in 2013 for a large-scale warehouse facility at Red Lodge but that this was not acceptable to Forest Heath District Council due to the potential impacts on nearby residential development and the business was forced to look elsewhere. Interestingly, it is worth noting that the only significant development at Kings Warren Business Park (Land North of Acorn Way, Red Lodge) was for a large distribution “shed”.
- 4.9 Having reviewed much of the evidence available on the local market, it is understood that there is very little space that is unlet within the Forest Heath part of the A11 Corridor. Indeed, a review of the zoopla, rightmove and primelocation commercial property websites in September 2017 found the only very limited unlet space to be available with vacancy rates across Forest Heath are currently very low.
- 4.10 Overall, there are clear indications that there is a need for further industrial and warehouse floorspace within the District with identified demand for the A11 Corridor. This is likely to become more acute in the next few years as existing sites are occupied and whilst a number of the longer-term employment sites take time to come forward. This will also be exacerbated by growth in the logistics and distribution sector driven by e-commerce and the need for more local distribution hubs with the A11 Corridor being a key focus for regional activity to serve Norfolk and Suffolk.
- 4.11 Indeed, as a result of the strength of potential demand, Taylor Farms have interest from an experienced commercial property developer in seeking to bring this site forward for development.

## 5.0 Conclusions

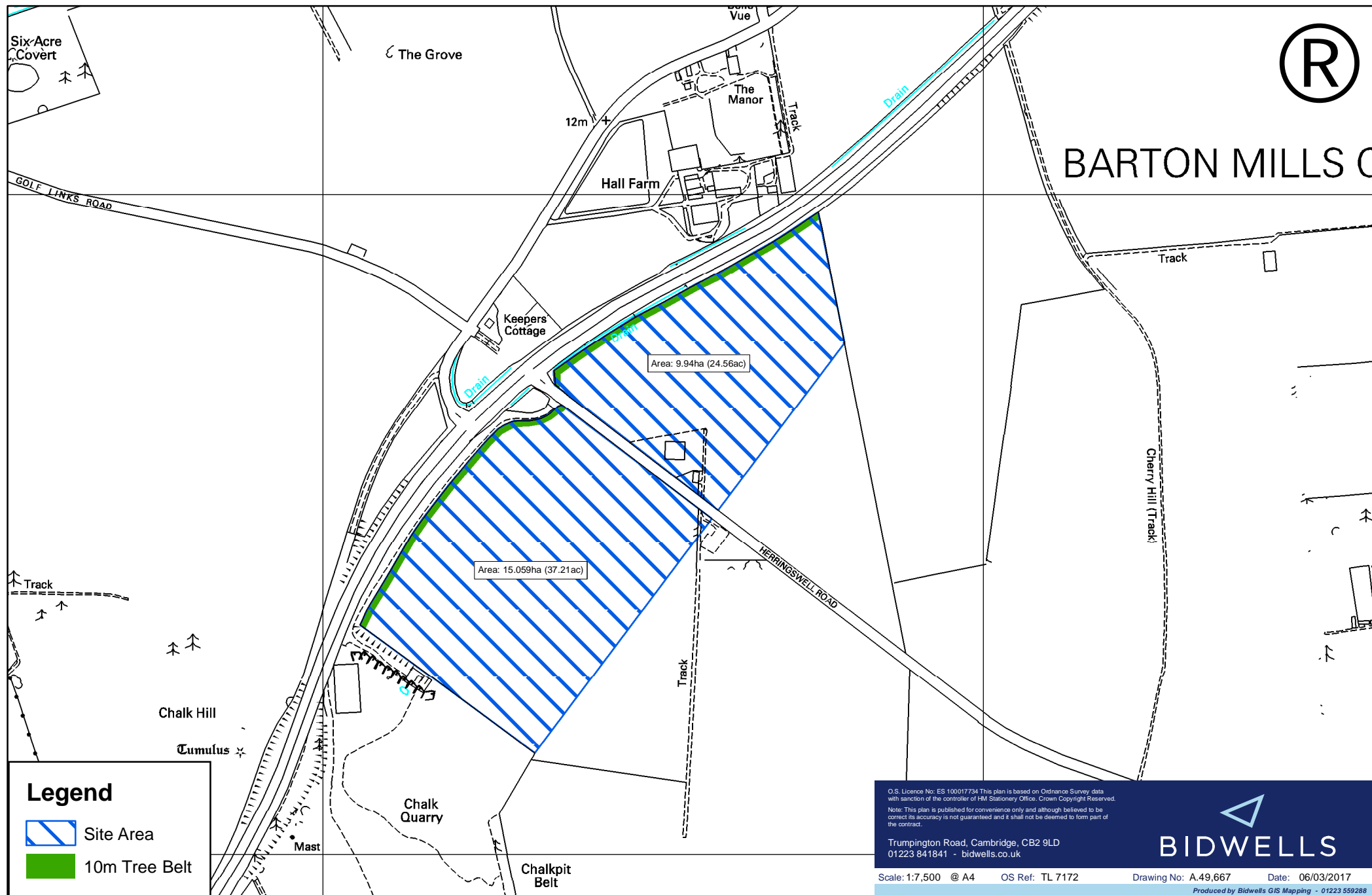
- 5.1 Bidwells LLP have been instructed by Taylor Farms Ltd to consider the employment land supply position in Forest Heath in support of the promotion of approximately 25 hectares of land off the A11 at Herringswell Road, Barton Mills for employment development.
- 5.2 This report provides an analysis of Forest Heath's employment land needs, supply position and evidence of demand, particularly for warehouse and distribution development. It identifies a number of concerns in this regard including:
- The Council's 2016 Employment Land Review fails to effectively respond to the Jobs Growth target within the Core Strategy;
  - The level of employment supply proposed within the Site Allocations Local Plan only just meets the Core Strategy minimum target for provision of additional employment land and does not include allowance for loss of employment sites, 10% vacancy rate to provide flexibility for general churn within the market or other factors such that the level of supply is unable to respond to rapid change;
  - The employment sites within the Site Allocations Local Plan are all identified within the ELR as Long-Term development sites which will require time to come forward. However, current vacancy levels for industrial and warehouse development are low and with limited pipeline supply there is likely to be insufficient supply in the short to medium term to meet local needs.
  - Insufficient consideration has been given to the effect of the A11 Growth Corridor and its implications for Growth;
  - There is evidence of demand for warehouse and distribution development in the A11 Corridor which at present cannot be met by existing or pipeline employment sites.
- 5.3 As a result, it is considered that additional employment sites should be allocated within the Site Allocations Local Plan to meet employment needs over the Plan period to 2026. It is considered that Taylor Farms' land off the A11 at Herringswell Road, Barton Mills is ideally placed to meet these needs being a deliverable greenfield site with no insurmountable barriers to delivery such that it could meet employment needs, particularly with regard to warehouse and distribution during the Plan period.

# APPENDIX 1

## SITE LOCATION PLAN

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# Land off A11 at Herringswell Road, Barton Mills



APPENDIX 2

EMPLOYMENT LAND SUPPLY TABLE

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# Forest Heath Existing and Proposed Employment Land Supply

Settlement	Existing Employment Sites			Proposed Employment Sites				Total
	Site Ref	Site Description	Size (Ha)	Site Ref	Site Description	Size	Use	
Newmarket	SA16(m)	Northern Industrial Estate	47.7	SA17(b)	St Leger	1.6	B8	
		<b>Sub Total Newmarket</b>	<b>47.7</b>		<b>Sub Total Newmarket</b>	<b>1.6</b>		<b>49.3</b>
Mildenhall	SA16(k)	Northern Industrial Estate	44.8	SA17(a)	Mildenhall Academy / Dome Leisure Centre	4.0	B1	
	SA16(l)	Extension to Industrial Estate	1.9	SA4(a)	Land West of Mildenhall	5.0	B1/B2/B8	
		<b>Sub Total Mildenhall</b>	<b>46.7</b>		<b>Sub Total Mildenhall</b>	<b>9.0</b>		<b>55.7</b>
Brandon	SA16(b)	Land at Station Way	1.2					
	SA16(c)	Land south of Railway Line	5.3					
	SA16(d)	Land south of London Road	5.9					
	SA16(e)	Land south Mile End	23					
		<b>Sub Total Brandon</b>	<b>35.4</b>		<b>Sub Total Brandon</b>	<b>0</b>		<b>35.4</b>
Lakenheath	SA16(j)	Land North of Station Road	6.5					
		<b>Sub Total Lakenheath</b>	<b>6.5</b>		<b>Sub Total Lakenheath</b>	<b>0</b>		<b>6.5</b>
Red Lodge	SA16(n)	North of Red Lodge	3.5	SA10(a)	Land north of Acorn Way	8.0	Unspecified	
		<b>Sub Total Red Lodge</b>	<b>3.5</b>		<b>Sub Total Red Lodge</b>	<b>8.0</b>		<b>11.5</b>
Kentford		Land south of Bury Road, Lanwades Business Park	3					
	SA16(g)	Land south of Gazeley Road	0.9					
	SA16(h)	Land south of Bury Road	0.3					
	SA16(i)	<b>Sub Total Kentford</b>	<b>4.2</b>		<b>Sub Total Kentford</b>	<b>0</b>		<b>4.2</b>
Other	SA16(f)	Land south of Swan Lane, Exning	0.7					
	SA16(a)	Land east of Mildenhall Drove, Beck Row	2					
		<b>Sub Total Other</b>	<b>2.7</b>		<b>Sub Total Other</b>	<b>0</b>		
<b>Total</b>			<b>146.7</b>			<b>18.6</b>		<b>165.3</b>



APPENDIX 2

**PREVIOUS REPRESENTATIONS**

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## Representation 24716 on Proposed Submission Site Allocations Local Plan by Taylor Farms Ltd represented by Bidwells (Ms Georgina Pickett)

**Support / Object:** OBJECT

**Document Link:** [Proposed Submission Site Allocations Local Plan - Economic growth potential in Forest Heath, Policy SA17: Employment allocations \(readdoc.php?docid=200&docelemid=d30420#d30420\)](#)

**Representation:** Land off A11 at Herringswell Road, Barton Mills is put forward for employment use. We object to Policy SA17 due to the exclusion of this site and lack of evidence relating to the quantum of employment space required over the plan period. It is considered that SA17 is unsound as it is not positively prepared or justified. The site is ideally located on the A11 between employment sites at Red Lodge and Mildenhall. The site is suitable, available and appropriate for development and should be allocated for employment use under SA17 to make the plan sound.

**Change to plan:** Allocate land off A11 at Herringswell Road for employment use.

**Is Legally Compliant?** No

**Is Sound?** No

**Complies with the duty to Co-operate?** Yes

**Soundness:**

i.	Positively prepared
ii.	Justified

**At examination:** Appearance at the Examination


Original submission

This representation is made on behalf of Taylor Farms, to object to Policy SA17 regarding land off A11 at Herringswell Road, Barton Mills. Policy SA17 sets out the proposed employment allocations. Land off A11 at Herringswell Road, Barton Mills, comprises 25 hectares of land located on the east side of the A11 between Barton Mills and Red Lodge. The site is divided in two by Herringswell Road, the northern parcel comprises 9.94 hectares of land and the southern parcel comprises 15.059 hectares. A plan indicating the draft allocation of Land off A11 at Herringswell Road is attached to this representation. The land is put forward as an employment allocation for B1, B2 and B8 uses. Discussions relating to this site took place in 2012 with James Waters (FHDC). As part of this process, the Highways Agency confirmed that, to service future development from Herringswell Road, a flyover would not be required and a roundabout would be acceptable in this location. A portion of the site could be devoted to start up units to allow home businesses to expand and grow. FHDC are promoting inward business investment in the District, yet in the year 2014/2015 there was a net loss in employment land. As such, the Annual Monitoring Report sets a target for there to be no loss in employment space. Due to the permitted development rights which allow the conversion of office space to residential use, new employment space will need to come onto the market to address this loss. Given the sites position between the employment sites at Mildenhall and Red Lodge, along the District's only trunk road (A11), makes it ideally situated for a proposed employment use. Policy SA17 does not contain any justification for the allocated sites and there does not appear to be any consideration of alternative sites. The draft allocations are based on Core Strategy Policy CS6, which aims to provide 16ha of employment allocations by 2026. This a minimum requirement which is based on historic evidence and covers a different plan period to the draft Local Plan. As the plan period extends to 2031, and no new evidence has been submitted which assesses the amount of employment space required in this plan period, this is not a reliable figure to base the allocation of new employment sites on. For this reason, this policy is considered unsound as it is not positively prepared or justified.

### Attached Files for this Submission

[A49667.pdf \(download.php?action=download&uploadid=7169\)](#) - Supporting Document (102.4 KB)

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