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North Norfolk District Council's response to Inspector's Matters, Issues & Questions (8.1 to 8.16) in relation to:

Matter 8: Employment Policies & Allocations

Issue: Whether the plan is positively prepared, justified, effective and consistent with national policy in relation to the overall provision of employment land, employment policies generally and whether the proposed new allocations are justified and effective.

References in square bold brackets **[xx]** refer to Examination Library document numbers, their page and/or paragraph. The Examination Library can be accessed at:

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Introduction

This document is North Norfolk District Council's response to the Matters, Issues and Questions identified for examination by Inspector David Reed of the Planning Inspectorate, as published on 3 November 2023 [EH002]. This is one of eleven separate response papers produced to address the specific matter and issue as identified on the front page.

Each response paper includes a number of references to specific evidence which has been relied upon in answering the matters, issues and questions. These reference numbers relate directly to the Examination Library website, where all evidence is published:

www.north-norfolk.gov.uk/localplanexamination

References to 'modifications' relate to such modifications requested by the Planning Authority in Schedules 4 and 5 submitted alongside the Plan [A5.11 and A5.12]. For ease of reference, where these requested modifications relate to the Councils response to each question, details have been included in this response.

Response to Inspector's questions

Employment Land - Policy E1

8.1 Should the 6 ha Holt employment site be deleted from the plan on the grounds it is unavailable? If so, what are the implications of this for employment land provision? Is replacement land required, and if so, where?

8.1.1 One of the soundness tests applied to examination of the Plan is that it should be effective. The Plan will be effective if it's policies and proposals have a good prospect of being delivered. In the case of the proposed employment land at Holt the site owner has made clear in formal representations and subsequent discussions that there is no prospect of this proposed allocation being made available for development within the plan period. Inclusion of the site would fail to meet the effectiveness tests and would not be a sound approach.

8.1.2 Ideally, the Authority would favour designating further employment land in Holt. The original designation was primarily made to extend the choice of sites available, given that there is already designated and undeveloped employment land in the town.

8.1.3 No suitable employment land alternatives were put forward through the call for sites process so the authority was unable to allocate a 'second best' site. Alternatives which might have been available are located in the Glaven Valley Conservation Area and were discounted as development sites through the plan assessment processes.

8.1.4 The Council is nevertheless concerned to ensure that suitable land for employment investment should be available in sufficient quantities and in locations likely to address future demands in a sustainable way. The Authority has tabled a modification PMIN/E3/01, detailed below, to Policy E3 of the Plan which will allow for employment generating developments on sites not specifically allocated, or designated, for that purpose in the plan. This would include sites outside of adopted development boundaries in circumstances where allocated/designated sites are not

available or shown to be unsuitable. This provides sufficient flexibility and negates the need for further employment land allocations either in Holt or elsewhere.

Relevant Proposed Modifications

Additional Modifications to the Plan are put forward through Schedule 4 - Schedule of Proposed Additional Minor modifications [A5.11]. The Table below details the relevant modifications in relation to the response above.

PMIN/E3/01	<p>Amend criterion 1 of Policy E3 as follows.</p> <p>(a) there is no suitable and available land on designated or allocated employment areas; and or</p> <p>(b) there are specific reasons for the development not being located on designated or allocated employment areas, including, but not limited to:</p> <p>...</p> <p>Amend first paragraph of supporting text, as detailed in Schedule 4.</p>
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8.2 Is the designation/allocation of 272.07 ha of land and allocation of 17.43 ha of new land as specified in Policy E1 (6 ha less if the Holt site is removed) justified and sufficient to meet identified employment needs in the district over the plan period 2016-36, including any necessary flexibility?

- 8.2.1 Yes. The updated Background Paper 3: Approach to Employment [C3] explains the approach that the Council has taken to employment growth and sets out the justification for the quantum and distribution of employment land that is required through the plan period. The findings of this directly supports Policy E1, Employment Land in the Local Plan and the approach to employment.
- 8.2.2 Two minor modifications to the totals are proposed through PMIN/E1/01 in relation to the allocated amount (1ha) in Stalham bringing the table into alignment with the site policy ST23/2 and a further amendment reflecting the withdrawal of the site at Heath Farm, Holt (H27/1) through PMIN/12.3/01 making the total provision 265.7 ha.
- 8.2.3 The purpose of these designated employment sites is primarily to provide for and protect B Class Uses (General Industry) but is also to ensure that alternative uses are permitted where there are no sequentially preferable sites such as E(g)offices, research and development and industrial processes.
- 8.2.4 The Council's approach is one that guides new employment generating development towards designated employment sites and to additional allocations, both employment and mixed use, in order to serve local markets, provide choice and opportunities and align with the strategic growth ambitions.
- 8.2.5 Justification should be considered against the backdrop of the NPPF where the onus is on LPAs to deliver the three overarching aims of sustainable development in a mutually supportive way and help build strong, responsive and a competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth by

- developing strategic policies and setting out an overall strategy that includes making sufficient provision for employment, retail and other commercial development.
- supporting an appropriate mix of uses across an area, and within larger scale sites to minimise the number and length of journeys needed for employment and other activities.
- setting criteria, or identify strategic sites, for local and inward investment.
- setting out policies that are flexible enough to accommodate needs not anticipated in the Plan and enable rapid response to changes in economic circumstances.
- enabling and supporting a prosperous rural economy.

8.2.6 Establishing the requirements for future employment growth across North Norfolk is set out in section 4 of the background paper **[C3]**. Four scenarios for growth were reviewed as detailed in the 2021 Growth Sites Delivery Strategy undertaken by BE/WSP **[H6]** and summarised in the Background paper. This included an assessment of:

- Past Land Take-up - looking at past employment development within the district and taking this forward across the plan period.
- Labour Demand Forecasting - which looks at econometrics based on the East of England model and projects the likely jobs growth in different sectors forward across the plan period.
- Labour Supply Forecasting - looks at the residential growth in the district and the resulting implications of providing jobs over the plan period; and
- Policy On Demand Forecasting - which adjusts the Demand Forecasting model with specific policy interventions such as Scottow Enterprise Zone and the North Walsham Urban Extension.

8.2.7 Based on these four scenarios the future employment land requirements, including a five-year buffer are summarised as:

Scenario	Land Requirement (Inc. buffer)
Land Take Up	40.0 ha
Labour Demand	8.1 ha
Labour Supply	20.6 ha
Policy On Labour Demand	10.9ha

8.2.8 The study concludes that the past land take-up of approach 1.6 ha annually based on the average take up since 2000 is the scenario that better reflects the local market, particularly in relation to industrial land for manufacturing uses and that the other scenarios appear to underestimate the land requirements going forward which are all below the Past Take Up scenario.

8.2.9 The Council undertook reviews of the existing employment areas and their boundaries to establish the available capacity to support the growth target on existing and emerging designated employment sites as detailed in section 5 and 6 of the Background Paper **[C3]**.

- 8.2.10 As detailed in policy E1 the approach seeks to carry forward the existing designations of employment areas and to designate those former mixed use/ employment allocations as employment areas, in recognition of their contribution towards the local economy, and the provision of local employment opportunities as well as through the allocation of further new employment/mixed use allocations. Through the re-designated and newly designated employment sites the submitted Plan will provide up to 54.06 ha of available employment land. This is set against a requirement of 40 ha over the plan period, based on a review of past take up rates of 1.6 ha /yr + 5yr buffer.
- 8.2.11 It is recognised that site availability and capacity does vary across the district and as typical in a rural district, settlements are dispersed, and smaller areas of employment also exist. These smaller businesses remain important to the economy and provide a range of local employment opportunities and it remains important that local businesses are also supported. It remains necessary to ensure further local land supply (employment /mixed use allocations) is provided through land allocations in appropriate settlements in order to provide for local opportunities, including the expansion of existing businesses and provide land, choice and flexibility for new investment, reduce the reliance on transport and also to ensure the Council’s strategic growth ambitions are achieved. Collectively the Plan through Policy E1 sets out a land supply to provide for 71.49 ha of employment land across the Plan period based on 54.06 ha of existing capacity and a further 17.43 ha through new mixed use and employment allocations. Factoring in the proposed additional modifications, (the withdrawal of the site at Holt and the alignment with ST23/2 requirement (minus 7ha)), policy E1 sets out a land supply of 64.49 ha against a 40ha requirement.
- 8.2.12 In addition to the provision of designated employment land supply, Policy E3 recognises the importance of supporting employment outside the designated employment areas. The policy provides additional support for the expansion of existing business and new business which are either related to rural activities such as agriculture and forestry or where there are clear sustainability advantages for a business being located close to the market it serves.
- 8.2.13 Collectively the approach is considered to ensure there is sufficient quantity of land, flexibility and choice to meet employment generating development across the district.

Relevant Proposed Modifications

Additional Modifications to the Plan are put forward through Schedule 4 - Schedule of Proposed Additional Minor modifications [A5.11]. The Table below details the relevant modifications in relation to the response above.

PMIN/E1/01	Corrections and alignment with policy ST23/2
PMIN/12.3/01	Amendment following the withdrawal of site H27/1

8.3 What would be the implications if the plan period were extended to 2020-40? In that scenario, should any further employment land be allocated?

- 8.3.1 A further 6.4ha of employment land would potentially be required if the Plan was extended a further 4 years, based on the historical take up rate of 1.6 ha yr average. Overall, the land supply requirement would increase to 42.49ha. and 50.49ha with the additional 5yr buffer applied. Policy E1 already makes provision for 64.49ha (adjusted to reflect proposed additional modifications). With the equivalent of 8.75ha yrs further employment land remaining after 2040 plus a further 8ha already built into the requirement through the cautious approach of applying a 5yr buffer based on past take up rates it is considered that there would be sufficient employment land and no need for additional allocations if the Plan period was extended to 2040.
- 8.3.2 Based on past take up rates of 1.6 ha /yr there would be a theoretical pipeline surplus of approximately 10.5 yrs passed the 2040 Plan date. The Council does not consider there is an evidential basis for making additional employment land allocations in the event that the plan period is extended to 2040.
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8.4 Would the distribution of existing and allocated land across the district meet the needs of the various different settlements?

- 8.4.1 Yes, it is considered that the updated quantum of land proposed within each location is sufficient to meet the needs in a flexible way across the district in accordance with the spatial hierarchy and strategy of the requirement for employment land across the district. Further information on the breakdown and available amounts of employment land at each employment site / allocations is contained in Appendix 1 and 2 of Background Paper 3: Approach to Employment [C3].
- 8.4.2 Commuting patterns in North Norfolk show a net outflow of workers from the district, predominantly to other areas of the County, particularly Norwich, 63.3% of employed residents of North Norfolk work within the district, while 70.5% of workers that make up the North Norfolk workforce reside in the district. Analysis indicates that 51.2% of the North Norfolk workforce live within the immediate area of employment, while a further 28.5% live within the district. In total 79.7% of the overall workforce within North Norfolk live and work within the district. These figures are higher for areas such as Cromer, Holt and Sheringham and lower for areas around Stalham and Fakenham where trends of outflow are more prevalent.
- 8.4.3 This data broadly illustrates that the district functions as three separate sub areas. The eastern area of the district which covers North Walsham, Stalham, Hoveton and their surrounds, the western area, which covers Fakenham and Wells-next-the-Sea and the central area which covers the towns of Cromer, Holt and Sheringham and is largely self-contained in terms of employment and acts as a more localised market.
- 8.4.4 The eastern area of the district has a greater relationship to Great Yarmouth, Norwich and the Broads. This area has historically had high levels of employment in agriculture, the defence sector, manufacturing and Broads based tourism. There has been a decline in manufacturing, particularly food manufacturing, but a growth in the plastics and boat building and marine sectors, with investment and employment growth in these sectors in North Walsham and Catfield. The town's industrial businesses are focused on manufacturing of machinery and equipment, plastics products and metal fabrication. North Walsham has seen the greatest levels of

activity within the district with the town accounting for a quarter of the District's deals over the last 15 years. Levels of employment in the tourism sector in this part of the district remain stable but with a change from Broads based boating related activity to small scale land –based accommodation and attractions. The proximity of this part of the District to Norwich has meant that there is increasing levels of out-commuting. The Eastern sub-region has the largest share of available land area in the district over the planning period with the town of North Walsham and Scottow Enterprise Park providing the larger quantum of employment land.

- 8.4.5 The western area of the district has a greater relationship with Kings Lynn and the south. Fakenham acts as a large centre of employment for a large rural area of north-west Norfolk, extending beyond the district's boundary. The town occupies the most accessible location in the district in terms of access to the national road network and, as a result, has strong manufacturing base and presence of distribution companies and is seen as an attractive location for investment. Building off its existing high level of self-containment and its role as an employment centre for surrounding settlements.
- 8.4.6 Fakenham offers a strong opportunity for sustainable development. The town has seen some change in its manufacturing base with the loss of some jobs in the food processing sector, although this remains the single largest employment sector in the town. Approximately half of the available land within the Western sub-region is within Fakenham. The other half is mostly located in Egmore Enterprise Zone and Tattersett Business Park, two rural locations that have been available for several years, with only limited take-up. Wells-next-the-Sea contains limited supply of employment land; however, there is also little evidence of demand for new industrial development. Tourism and fishing are important sectors to the local economy. The town's location and relative inaccessibility is likely to discourage business start-ups. Any demand is likely to be from local businesses and service providers. Egmore Business Zone lies to the south of the town and has been established to support any investment associated with the growing offshore renewables sector off the North Norfolk Coast.
- 8.4.7 The central area is dominated by tourism with the resort towns of Cromer and Sheringham and the Area of Outstanding Natural Beauty providing a large number of jobs in the hospitality sector. There is also a large number of jobs in retailing and public administration – with Cromer being the administrative centre of North Norfolk District Council and having a small district hospital, department of work and pensions office and a magistrates' court. The coastal towns are subject to further constraint due to their environmentally sensitive locations. Evidence within the 2015 Business Growth and Investment Opportunities Study **[H7]**, Retail and Main Town Centre Uses Study 2017 **[H3]**, and the 2021 Growth Sites Delivery Strategy **[H6]**, shows that the towns of Cromer, Holt and Sheringham function as a network in terms of movement for employment between the towns. The Business sites Delivery Strategy **[H6]** concludes that given this area is a more localised market (with the Eastern and Western subregions having larger businesses and more outward looking economies), it is appropriate that the Central sub-region has the lowest share of available land.
- 8.4.8 More detail of the approach and town analysis is contained in section 2.16-2.34 of Background Paper 6 **[C3]**. It's recognised that site availability and capacity does vary across the district and as typical in a rural district, settlements are dispersed, and smaller areas of employment also exist. These smaller businesses remain important

to the economy and provide a range of local employment opportunities and it remains important that local businesses are also supported. It remains necessary to ensure further local land supply (employment /mixed use allocations) is provided through land allocations in appropriate settlements in order to provide for local opportunities, including the expansion of existing businesses and provide land, choice and flexibility for new investment, reduce the reliance on transport and also to ensure the Council's strategic growth ambitions are achieved.

- 8.4.9 Policy E3 recognises the importance of supporting employment outside the designated employment areas. The policy provides additional support for the expansion of existing business and new business which are either related to rural activities such as agriculture and forestry or where there are clear sustainability advantages for a business being located close to the market it serves. This brings a degree of flexibility without the need for further allocations.
- 8.4.10 Collectively the policy approach is considered to ensure there is sufficient quantity of land, flexibility and choice to meet employment generating development across the district.

Employment Allocations

8.5 Are the employment allocations in the plan the most appropriate when considered against reasonable alternatives in the light of the varying needs across the district, site constraints, infrastructure requirements and potential impacts?

- 8.5.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA Part 2 [H1] explores how sites were first identified, then assessed, and how those found to be unsuitable, unavailable and/or unachievable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the further assessment of each site if and how these constraints could be overcome with appropriate mitigation.
- 8.5.2 The Sustainability Appraisal, which identified at an early stage and throughout the process the potential social, economic, and environmental impacts of sites, plans and strategies used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against different criteria.
- 8.5.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure, as well as the need for employment in the area, the approach to which is laid out in both the HELAA Part 2 [H1] and the Approach to Employment Paper [C3].

8.6 For each allocation, please answer the standard questions set out in Matter 6 except those not relevant to employment sites.

8.6.1 Land East of Bradfield Road (NW52)

A) Has the site been allocated previously or is it a new allocation?

8.6.1.1 The proposed allocation, NW52 is a new allocation in the Plan. The site is included in the HELAA Part 2 as HE0081.

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

8.6.1.2 The site does not have planning permission, there have been no applications for this proposed allocation.

C) Are any modifications suggested to the policy or text, or the site boundaries? If so, why, and are they justified or required for effectiveness?

8.6.1.3 All proposed modifications are justified and effective. Major and minor modifications have been proposed for the majority of proposed allocations and are a result of the Council engaging directly with statutory and general bodies through a range of consultation methods in order to ensure the involvement of a wide audience as part of the plan making process. Through the Regulation 19 Consultation, the Council received a total of 697 representations. In reviewing these comments, the Council identified and summarised the main issues which can be found in the Council's Consultation Statement [A5].

8.6.1.4 In response to the issues raised, the Council has produced a Schedule of Additional Proposed Modifications [A5.11 - A5.12] for consideration during examination, based on the representations received during Regulation 19 [A5.8 - A5.9]. These proposed modifications are considered to be helpful in aiding the interpretation and implementation of the Plan by improving its effectiveness, clarity and addressing many of the concerns made during consultation. The majority of the proposed additional modifications are considered to be minor in nature and consist of grammatical fixes, factual updates or improve the legibility and understanding of policy wording.

D) Have the impacts and effects of development been properly taken into account?

8.6.1.5 Yes, the impacts and effects of development on each of the proposed allocations has been comprehensively taken into account via the use and implementation of:

- A comprehensive Sustainability Appraisal process
- A detailed Site Assessment Methodology from the HELAA Part 2 [H2]
- Consultation and testing of proposals with internal and external consultees and through public consultation.
- Completion of Habitat Regulations Assessment

8.6.1.6 The HELAA Part 2 provides a detailed description of the process and assessment criteria adopted.

8.6.1.7 These processes ensure that each site proposal has been subjected to a consistent and extensive assessment process which identifies the potential impacts and effects of development and the need for any mitigation. Unsuitable sites which did

not meet the assessment criteria were ruled out. Policy requirements were refined following each stage of assessment and consultation to ensure that development proposals address any possible adverse impacts. This is further explained in HELAA Part 2.

H) What is the land ownership position and is the site currently being promoted by a developer?

8.6.1.8 NW52 is in single ownership, the site is being brought forward by a landowner/promoter with the intention of negotiating with potential developers in the near future.

8.6.2 Tattersett Business Park (E7)

A) Has the site been allocated previously or is it a new allocation?

8.6.2.1 The proposed allocation, E7 is an existing allocation in the Plan. The site is included in the HELAA Part 2 as HE0116.

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

8.6.2.2 **PO/23/1025** (May 2023) – Outline Planning Application for creation of a new film and TV studios. This application is pending determination.

C) Are any modifications suggested to the policy or text, or the site boundaries? If so, why, and are they justified or required for effectiveness?

8.6.2.3 All proposed modifications are justified and effective. Major and minor modifications have been proposed for the majority of proposed allocations and are a result of the Council engaging directly with statutory and general bodies through a range of consultation methods in order to ensure the involvement of a wide audience as part of the plan making process. Through the Regulation 19 Consultation, the Council received a total of 697 representations. In reviewing these comments, the Council identified and summarised the main issues which can be found in the Council's Consultation Statement **[A5]**.

8.6.2.4 In response to the issues raised, the Council has produced a Schedule of Additional Proposed Modifications **[A5.11 - A5.12]** for consideration during examination, based on the representations received during Regulation 19 **[A5.8 - A5.9]**. These proposed modifications are considered to be helpful in aiding the interpretation and implementation of the Plan by improving its effectiveness, clarity and addressing many of the concerns made during consultation. The majority of the proposed additional modifications are considered to be minor in nature and consist of grammatical fixes, factual updates or improve the legibility and understanding of policy wording.

D) Have the impacts and effects of development been properly taken into account?

- 8.6.2.5 Yes, the impacts and effects of development on each of the proposed allocations has been comprehensively taken into account via the use and implementation of:
- A comprehensive Sustainability Appraisal process
 - A detailed Site Assessment Methodology from the HELAA Part 2 [H2]
 - Consultation and testing of proposals with internal and external consultees and through public consultation.
 - Completion of Habitat Regulations Assessment
- 8.6.2.6 The HELAA Part 2 provides a detailed description of the process and assessment criteria adopted.
- 8.6.2.7 These processes ensure that each site proposal has been subjected to a consistent and extensive assessment process which identifies the potential impacts and effects of development and the need for any mitigation. Unsuitable sites which did not meet the assessment criteria were ruled out. Policy requirements were refined following each stage of assessment and consultation to ensure that development proposals address any possible adverse impacts. This is further explained in HELAA Part 2.

H) What is the land ownership position and is the site currently being promoted by a developer?

- 8.6.2.8 E7 is in single ownership, the site is being brought forward by a landowner/promoter with the intention of negotiating with potential developers in the near future.

8.7 Land East of Bradfield Road, North Walsham (2.4 ha): Are the proposed access arrangements justified and would they be effective? Would a new railway bridge be required, and would this be deliverable?

- 8.7.1 At the time of Plan submission a detailed Highway Impact Assessment had not been undertaken for the strategic allocation at North Walsham, NW62/A, which includes small development parcels to the north of Bradfield Road rail bridge. Similarly, no detailed assessment had been completed in relation to the proposed employment land allocation NW52 which includes a policy requirement to provide a connection to Bradfield Road. It was assumed that these proposals were likely to require improvements to Bradfield Road rail bridge.
- 8.7.2 A detailed Highways Impact Assessment has now been completed in relation to the proposed strategic allocation (NW62/A) which has considered the traffic impacts of the allocation and has concluded that Bridge improvements are not necessary in relation to development on the southern side of the bridge. This conclusion has been agreed with the Highway Authority and is understood to be supported by Broadland District Council which is concerned that an improved link over the bridge may serve to further encourage HGV traffic through Coltishall and Horstead.
- 8.7.3 North Norfolk District Council, Broadland District Council, the Highway Authority and the consortium promoting development are working towards the completion

of a Statement of Common Ground which will table further modifications to the NW62/A Policy to reflect this position.

- 8.7.4 The consequences of this for NW52 employment land allocation are that alternative access arrangements, most likely via the existing Cornish Way, without a link to Bradfield Road, will need to be considered. This would avoid the need for bridge improvements.

8.8 7 ha of the mixed-use allocation West of North Walsham: For effectiveness, should the 7 ha proposed for employment use be allocated as such? Is its development phased with, or linked to the housing in any way? Would the land north of the railway require a new railway bridge, and if so would this be deliverable?

- 8.8.1 Local Plan policy NW62/A requires the delivery of approximately 7 hectares of employment land in the Cromer Road/Bradfield Road area. Within this general area a number of potential configurations of employment land may prove to be acceptable. The Plan as drafted is sufficiently effective in determining both the quantum and general location of employment land without the need to make a specific allocation. The final location will need to have regard to the final access strategy, proximity to adjacent uses and the market attractiveness of the location. These are matters best considered via the preparation of the required Development Brief and secured via subsequent planning applications.
- 8.8.2 The development of the employment land will need to be phased as the housing development proceeds. The authority would typically require the servicing and marketing of employment land in phased releases as the development proceeds. Again, these are matters best determined via the associated planning application(s) and legal agreements. The consortium promoting development has sufficient control over land in this location to meet the policy requirements and could meet the requirements of a phasing obligation.
- 8.8.3 It is anticipated that employment land would be located on land to the south of the rail bridge in which eventuality the evidence indicates that no improvements to the bridge will be required.

8.9 What is the rationale for 1 ha of employment land within the Stalham allocation North of Yarmouth Road & East of Broadbeach Gardens? Which part of the site is envisaged for such use?

- 8.9.1 There is no serviced and available employment land available in Stalham. The opportunities that exist mainly comprise the re-use of existing buildings many of which are poor quality. Previous applications on the site have included opportunities for purpose-built employment units on the site frontage. The Authority wishes to retain this opportunity by including a modest requirement within the policy.

8.10 28.8 ha allocation at Tattersett Business Park: Are the restricted range of uses proposed for the site, and the requirement to demolish an equivalent amount of existing floorspace, justified?

8.10.1 Tattersett Business Park is a rolled forward allocation from the adopted Site Allocations Development Plan. The site is comparatively distant from the main centres of population in this part of the district (Fakenham and Wells). The defined Growth Settlements and the allocated and designated employment land within them are the preferred locations for new employment development and would reduce the need to travel elsewhere for employment purposes.

8.10.2 Tattersett Business Park has a number of existing commercial uses, and it makes an important contribution towards accommodating businesses which might be inappropriate in built up areas. The intention of the allocation is to provide the opportunity for such uses without undermining investment in the Growth Settlements. This is achieved in the Plan by limiting the range of acceptable uses to those which are not capable of being accommodated in more sustainable locations either because of environmental or operational reasons.

8.10.3 The requirement to secure environmental improvements to the site as part of any future development proposals is considered reasonable. This would be secured via the removal of derelict and unsightly buildings and the need to secure agreement for an overall Master Plan to include comprehensive landscaping.

Employment Policies E2 - E9

8.11 Are Policies E2 - E9 positively prepared, justified, effective and consistent with national policy? Are any main modifications necessary, and if so what should these be?

8.11.1 Yes, the Council considers that the submitted Plan, along with the proposed additional modifications, reflects the district's strategic aims and objectives, and has been positively prepared, is justified through robust and proportional evidence, as set out in the document library **[A14]**, and is consistent with national policy. A self-assessment of the Plans against the legal and soundness tests has been undertaken and which has followed that of the PAS check sheets. Further information can be seen in the examination library: PAS self-assessment check sheet; soundness / Legal & NPPF compliance **[A11 and A12]**. A number of policies/elements of policies have been developed to compliment wider strategic agreements through the Norfolk Strategic Framework and input from statutory bodies which is seen as testament to positively working together to deliver in this policy area.

8.11.2 Specifically, Policies E2 - E9 have been positively prepared, are justified, effective and consistent with national policy reflecting in particular, the objectives of paragraph 120 and Section 6, of the NPPF 2023, where paragraph 82 includes that planning policies should 'set out a clear economic vision and strategy which

positively and proactively encourages sustainable economic growth.’ To this end, the purpose of the strategic economic policies’, is to support and enable the growth of the local economy, allowing for the provision of new jobs through the expansion of existing businesses, safeguarding existing employment sites and providing new opportunities for inward investment by delivering sustainable growth through improved employment opportunities close to where people live. Background Paper 3 Approach to Employment January 2022 [C3] explains and justifies the overall approach the Council is taking to achieve sustainable economic growth in the district.

- 8.11.3 In light of comments made at Regulation 19 stage and Planning Policy & Built Heritage Working Party regarding Policy E 3, two associated minor modifications (PMIN/8.3/01 & PMIN/E3/01) have been proposed in Appendix K- Schedule 4 Proposed Additional Minor Modifications [A5.11] as detailed below, that would increase the flexibility of Policy E 3 further by supporting expansion of existing rural businesses and new businesses that are either related to rural activities or where there are clear sustainability advantages for a business to be located close to the market it serves.
- 8.11.4 Policy E 4 seeks to maintain and enhance the vitality, viability and sustainability of the districts town centres, while Policy E 5 seeks to ensure that signage and shopfronts are well designed particularly in sensitive locations, such as Conservation Areas. Policies E 6 – E 9 cover new and existing tourism related development, including development concerning static caravans, touring caravan and camping sites, new tourist attractions and the retention of their supply requires particular consideration within the district due to tourism playing a significant part in the economic and employment base in the district.
- 8.11.5 The minor modifications set out below do not affect the soundness of the Plan but are proposed to update information and provide further clarity:

Relevant Proposed Modifications

Additional Modifications to the Plan are put forward through Schedule 4 - Schedule of Proposed Additional Minor modifications [A5.11]. The Table below details the relevant modifications in relation to the response above.

PMIN/8.3/01	<p>Add the following wording to the end of Para 8.3.1:</p> <p style="color: red;">Outside of designated settlements new build employment developments will normally be restricted, in accordance with Policy SS 2, unless it is clearly demonstrated that allocated and designated employment sites, or those located within the development boundaries of Selected Settlements, are not suitable or available. In such circumstances alternative sites which are well related to built-up areas and comply with the policies of this Plan will be considered. Such developments should be solely limited to employment generating uses unless the inclusion of other types of development is shown to be essential to enable the delivery of jobs which would not otherwise be provided.</p>
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PMIN/E3/01	<p>Amend criterion 1 of Policy as follows.</p> <p>(a) there is no suitable and available land on designated or allocated employment areas; and or</p> <p>(b) there are specific reasons for the development not being located on designated or allocated employment areas, including, but not limited to: ...</p> <p>Amend first paragraph of supporting text, as detailed in Schedule 4.</p>
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8.12 In Policy E2 is clause (1) to protect Employment Areas, Enterprise Zones, Employment Allocations and Mixed Use Allocations for employment use justified, consistent with national policy and would it be effective?

8.12.1 Yes, criterion 1 of Policy E 2 to protect Employment Areas, Enterprise Zones, employment allocations and mixed use allocations for employment uses is justified and consistent with national policy, where at paragraph 82b) of the NPPF 2023, it states the planning policies should: set criteria, or identify strategic sites, for local inward investment to match the strategy and to meet anticipated needs over the plan period.'

8.12.2 The Council's positive approach is evidenced in Background Paper 3 Approach to Employment [C3], which justifies the importance of reserving land solely for employment uses in order to offer a range of employment opportunities across the district to accommodate expansion of existing local businesses, as well as ensure that there are opportunities for companies to move into the area. Consequently, the approach is one that directs new employment generating development towards designated Employment Areas and Enterprise Zones, and to employment and mixed-use allocations in order to serve local markets and provide choice and opportunities. This strategy aligns with and is in response to the diversification of the economy and resulting changing landscape of national policy, which states at paragraph 120(a) of the NPPF 2023, that 'planning policies and decisions should encourage multiple benefits from urban and rural land through mixed use schemes.'

8.12.3 Policy E2 ensures the protection of existing and new employment land as well as employment and mixed-use allocations and as such, will be effective in safeguarding land for existing and new businesses within Use Classes B2 (general industrial), B8 (storage and distribution) and E(g) (commercial/ business operations) in order that a sufficient supply of employment land and premises are available to meet local employment demand and provide flexibility and choice for new business creation within the district. This is coupled with the strategic ambition to broaden the economic base of the district, which has a relatively narrow existing base with a high proportion of employment in tourism, food production and retail sectors, by providing more flexibility, particularly to accommodate mixed use developments and create new job opportunities.

8.13 Are the criteria for new employment development in Policy E2 clause (2) justified and would they be effective?

8.13.1 Yes, the criteria set out in Policy E2 clause (2) are justified being a comprehensive range of matters that cover requisite material considerations in the assessment of new employment development proposals. The assessment of such matters as health and amenity, as well as noise, odour, emissions and external lighting are important planning considerations that can require upfront details due to their potential to cause significant adverse effects on the quality of the environment for existing and future occupiers. The inclusion of the set of criteria ensures that the assessment of these matters will be effective in addressing any issues as part of the planning application process.

8.14 Is Policy E2 clause (3) for employment generating uses on Former Airbases and in the Airbase Technical Areas justified and is the restriction on new floorspace justified? Should there be some flexibility to capitalise further on these sites?

8.14.1 Yes, the support for employment generating uses on the Technical Areas of former Airbases is justified and supported by national policy, which at paragraph 120d) of the NPPF 2023 states that ‘planning policies and decisions should promote and support the development of under-utilised land and buildings’.

8.14.2 The district has four redundant defence establishments: Coltishall Airbase, Neatishead (part), Sculthorpe Airbase and West Raynham. Sculthorpe, West Raynham and Coltishall provide significant levels of existing housing but lack the key services and facilities which make them unsuitable locations for further new housing development, particularly as they are not well served by public transport either. Due to the more isolated location of these sites, any further development would be likely to lead to increased car journeys and undermine the spatial strategy approach of focusing growth in the eight main settlements in order to provide a sustainable pattern of development. The NPPF makes it clear that planning policies should ‘support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities (paragraph 106a).’

8.14.3 However, it is recognised that these locations represent an under-used resource within the district and as such, the re-use of the existing buildings or the development of replacement buildings is supported by criterion 3 of Policy E 2, being a proportionate form of development given the isolated locations of the former airbases. The significant scale of the existing buildings on the former airbase sites is already regarded as being at an inappropriate level for new development within countryside locations, and consequently, the principle of allowing further increases in floorspace in such unsustainable locations is considered to be contrary to national policy, as mentioned above and would undermine the Plan’s spatial strategy.

8.15 In Policy E4 are the local impact thresholds justified?

8.15.1 Yes. Justification should be considered against the backdrop of the NPPF where the onus is on LPAs to:

- Plan positively for town centres.
- Set out the overall strategy for the pattern, scale and design quality including retail.
- define a network and hierarchy of town centres and promote their long-term vitality and viability.
- When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m² of gross floorspace).

8.15.2 Evidence supporting the setting of locally derived impact thresholds is provided through the North Norfolk Retail and Town Centre Study [H3], undertaken by Lichfields, where the default impact threshold set in the NPPF of 2,500m² is considered to be disproportionate (too high) in relation to the existing scale of all town centres within North Norfolk, as development of this scale would exceed, or represent a significant proportion of the overall floorspace projection for each town, over the plan period. The impact of smaller development needs to be considered. For example, retail development in Wells-next-the-Sea, which is classed as a medium town centre, at the NPPF threshold would be nearly five times the total floorspace projections over the plan period. At the other end of the retail hierarchy retail development at this scale in Cromer which classed as a large town centre would still represent at least 59% of the total floorspace projection for Cromer over the plan period.

8.15.3 Given this, and the fragility of some of the town centres smaller thresholds are proposed in line with the supporting evidence in the Retail Study.

8.16 Is Policy E6 too restrictive, unnecessarily constraining sustainable rural tourism?

8.16.1 No, Policy E 6 provides proportionate and necessary locational criteria for new tourist accommodation, where the purpose is to ensure that new build tourist accommodation, static holiday caravan sites and holiday lodge sites are located in the most sustainable locations whilst also allowing flexibility for existing businesses within the countryside to expand, where appropriate.

8.16.2 The economic prosperity of North Norfolk is significantly linked to the success of its tourism sector. The district has one of the most distinctive and diverse tourism offers in the East of England with the main appeal being its unique environmental assets of coastline and beaches, the Broads and inland areas of countryside. Therefore, the preferred location for new build tourist accommodation, static caravan sites and holiday lodge sites is within the boundary of a designated settlement to protect the wider environmental assets of the district that visitors specifically come to enjoy and enable visitors to access a range of facilities and services by a choice of sustainable travel modes.

8.16.3 In addition, new tourist accommodation will be required to achieve a minimum of 10% biodiversity net gain and, being overnight accommodation, any such proposals would also be required to contribute towards a scheme of avoidance and mitigation measures in accordance with the Norfolk Green Infrastructure & Recreational Impact Avoidance & Mitigation Strategy **[G9]**, given that such accommodation is likely to affect the integrity of internationally designated sites in North Norfolk through recreational disturbance.