For and on behalf of
Larkfleet Homes Norfolk and Suffolk Ltd

Waveney District Council Local Plan
Response to Inspector’s Questions Matter 7: Strategies for Beccles and Worlingham, Halesworth and Holton, Bungay and Southwold and Reydon

Prepared by
Strategic Planning Research Unit
DLP Planning Limited

September 2018
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Waveney District Council Inspector’s Questions
Matter 7 - Strategies for Beccles and Worlingham
Larkfleet Homes Norfolk and Suffolk

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1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared by the Strategic Planning Research Unit ('SPRU') of DLP Planning Ltd on behalf of our client, Larkfleet Homes Norfolk and Suffolk Ltd. The Company is part of the Larkfleet Group, a privately owned housebuilder and developer headquartered in Lincolnshire.

1.2 Larkfleet have an interest in land west of Ellough Road to the south of Beccles and Worlingham (WLP3.1) and have undertaken a range of engagement exercises – including with the local community, Worlingham Parish Council, Beccles Town Council, Waveney District Council, Suffolk County Council and other key stakeholders - to gauge opinion of the potential development of the site.

1.3 Although the site proposed by Larkfleet has been allocated in the emerging Local Plan, which we support in principle, we consider that there are numerous soundness issues both with the allocation and with regards to other policies within the Plan which may inhibit the timely delivery of the allocation, but which may be resolved by modifications to the plan.
2.0 MATTER 7 – STRATEGIES FOR BECCLES AND WORLINGHAM, HALESWORTH AND HOLTON, BUNGAY AND SOUTHWOLD AND REYDON

(Policies WLP3.1- WLP3.3, WLP4.1 – WLP4.6, WLP5.1, WLP5.2, WLP6.1 and WLP6.2)

a) Q7.1: Are the following allocations for development and policy areas defined on the policies map soundly-based; are the criteria set out in the relevant policies justified and effective; and is there evidence that the development of the allocations is viable and deliverable in the timescales indicated in Appendix 3 of the plan?

• Policy WLP3.1 – Beccles and Worlingham Garden Neighbourhood

2.1 Our client Larkfleet Homes fully supports the allocation of WLP3.1 of which the land that they control site forms approximately 60% of the proposed allocation. The development of Larkfleet’s interest is readily deliverable both on its own and as part of the wider allocation however we consider that specific elements of the policy are not sound particularly with regard to the detailed wording of the Policy.

2.2 We consider that the allocation for 1,250 dwellings is too low, that a greater quantum of development could be brought forward (in the region of 1,475 overall with around 975 dwellings on Larkfleet’s site), and that this would lead to a more efficient and effective use of the land. This increase will assist the delivery of the community assets and maintain them as viable and sustainable in the long term. This is supported by extensive work undertaken to support an outline planning application which is to be submitted shortly to the Council.

2.3 Beccles is a highly sustainable location and development of the proposed ‘Garden Neighbourhood’ would offer a prime opportunity to promote and ensure the continued vitality of the town and provide the new homes and services that are needed in an appropriate and accessible location.

2.4 As identified previously, the land is not subject to any local, national or statutory constraints that would inhibit development. The scale of the allocation proposed offers scope to deliver a residential led mixed use development including a variety of new facilities and services that would complement of both Beccles and Worlingham and support the long-term viability of Beccles as an important market town.

2.5 Larkfleet have, to date, carried out a significant amount of technical assessment in relation to the site, including matters such as transport and highways, flood risk and drainage, heritage and archaeology assessments, ecology (species and habitats) surveys, landscape and visual appraisal, air quality, noise, odour, contamination, utilities, water cycle and resources.

2.6 In addition to this, they have undertaken a substantial amount of stakeholder and community engagement, including holding two public exhibitions, engaging with local stakeholders (including Beccles Town Council and Worlingham Parish Council) and statutory providers (such as the Education Authority, Highways Authority, healthcare providers, built and outdoor leisure facilities providers, etc.).

2.7 This raft of preliminary work and engagement with both community interests and infrastructure providers has ensured a detailed understanding of both site-specific and broader local issues. This has, in turn, informed Larkfleet’s understanding of, and
proposals for the site. Therefore, these representations are considered to be well-informed and founded on an appropriate and detailed evidence base. Larkfleet have sought to engage with Waveney District Council in order to work collaboratively to bring forward the most effective and deliverable proposals for the site. The Company welcomes the opportunity for future collaborative working to secure the early realisation of the development in support of the Local Plan vision and the objectives for the District. We consider such collaborative work is essential, the reason being that it can facilitate the early delivery of the site which is necessary to ensure that the District can demonstrate a continuing five-year supply of housing land, to meet the Government’s requirement to boost significantly the supply of housing land and to ensure that the Local Plan can be demonstrated to be robust and capable of implementation.

2.8 However, bullet point 11 of the policy is un-sound. It gives development plan status to a masterplan which is contained at Figure 13 of the Local Plan. The masterplan should be in accordance with the development plan and not the other way around. Therefore, the bullet point should be deleted and replaced with:

“Development proposals should support the delivery of the identified community facilities, access and utilities that will serve the entire garden neighbourhood and the wider community. Where any application is for only part of the site the applicant should demonstrate how their application does not prejudice the delivery of the remainder of the site.”

2.9 We are concerned that the masterplan depicted at Figure 13 appears to have little regard to technical evidence and the specific constraints and opportunities that the land identified by Policy WLP3.1 exhibits. In progressing Larkfleet’s proposals for their part of the wider allocation to date, a number of criteria have been identified which will necessarily have a defining influence on the proper masterplanning of the site, which has evolved accordingly to reflect these. This has included engagement with key stakeholders and the local communities as well as technical and infrastructure matters and matters arising through environmental assessment.

2.10 In particular we would raise the following issues that have been considered and form key opportunities/constraints:

a. The most appropriate location for employment uses in terms of impacts on amenities and benefits of co-location with existing employment uses and the proposed community hub;

b. The presence of a water main traversing the site from east to west and need to maintain an appropriate easement for access/maintenance;

c. Discussions with Suffolk County Council (as Education Authority) regarding locational and delivery criteria for provision of a primary school;

d. Discussions with leisure facilities providers in respect of the identified need for built indoor and outdoor facilities in the locality, their form, preferred location, etc.;

e. The provision of a Continuing Care Retirement Community, its preferred location and the benefits of its co-location with other community uses and the proposed community hub;

f. Maximising opportunities for sustainable modes of transport; e.g. bus routing, footpaths and cycleways;
g. The opportunities provided by existing rights of way on and adjacent the site in terms of promoting accessibility;

h. Ecological opportunities provided within/adjacent the site and requirements to incorporate mitigation measures (for example, to alleviate recreational pressures on nearby Broads SPA, etc);

i. Impacts of noise on the development from external sources (specifically adjacent commercial land uses);

j. The consideration of impacts on existing residents at the south side of the town and provide enhancements/mitigation in terms of amenity, access to facilities, etc;

k. The requirement for any retail offer to be highly visible and accessible from outside the development to ensure it presents a viable opportunity for a commercial operator;

2.11 The indicative masterplan (and the allocation plan itself at Figure 13) currently excludes an area of land in the southeast corner which has been used as a construction compound for the construction of the Beccles SRR but will thereafter revert to its former use. It is noted however that whilst this area is included within the masterplan at Fig. 13 it is excluded from the site boundary describes at Figure 12. The Plan is therefore not consistent with itself. Rather than exclude this area from the proposed development - which would be likely to result in it becoming an unused area of waste ground - we would suggest its inclusion and positive identification for use as part of the allocation as depicted in WLP3.1 and its accompanying Figure.

2.12 Larkfleet support the principle of creating a masterplan for the overall site and look forward to seeking agreement with WDC outside of the plan making process. However, the Local Plan and policies must not give development plan status to a masterplan. We consider the bullet point should be modified to read:

“A masterplan should be submitted with any application which should demonstrate how it will facilitate the creation of a garden neighbourhood and will not prejudice the development of the whole of the site.”

2.13 For bullet point 14 there is no justification as to why a Country Park should be located on the boundary of the site with Ellough Road. This requirement is un-sound as it is not justified with appropriate evidence. It should therefore be deleted and replaced with the following:

“An appropriate provision of formal and informal open space should be provided to include sufficient facilities to meet the recreational needs of the community including the provision for cycling.”

2.14 In order to provide a Framework that is viable and deliverable the masterplan provided at Figure 13 of the Plan should be amended to reflect the specific technical constraints and opportunities presented by the site and allow Larkfleet to deliver housing on site at the earliest opportunity to achieve the objectives of the Local Plan. Please refer back to our Regulation 19 representation (Appendix 2, paragraphs 4.57- 4.65).

2.15 Whilst Larkfleet’s proposals could bring forward some employment development, which falls within the criteria of bullet point 6, we do not consider the requirement to bring
forward 5 hectares is soundly based, and the policy should be modified. As set out in our review of employment need and supply submitted to the Regulation 19 consultation (Appendix 1), the Council are significantly over allocating land for employment within the Plan period, to such an extent that it is contrary to National Policy. Moreover, we do not consider that the site is suitably located or required for employment development that is not compatible with residential communities or which might introduce large scale storage buildings or uses involving open storage. Specifically, we consider that any employment uses should they come forward, should be restricted to use classes B1(a) and B1(b). We therefore consider the following modification should be made to bullet point 6:

“Maximise opportunities for employment development (falling under use classes B1(a) and (b)).”

2.16 Bullet point 8 should be modified as it is too prescriptive concerning the location of suitable vehicular access points to the site. As we set out below, limiting access points to the new relief road has no regard to the availability of other infrastructure and the needs for orderly and effective phasing of development. More importantly it could lead to additional and unnecessary journeys, the majority of which will be to destinations within or around the existing built up area. We therefore consider the access point restriction un-sound. Through correspondence with the Country Council, it is considered an access from Ellough Road is both safe and suitable as well as desirable in order to ensure an orderly form of development and that this option should not be ruled out in addition to any connections to the relief road. In addition, should the employment element come forward, our client’s investigations indicate that there is no reason in highway terms why it should not have a dedicated access also to Ellough Road – where the preferred location of the employment uses is too close to the junction of the SRR and Ellough Road to enable direct access from the relief road. Therefore, we consider the bullet point should be modified to state:

“Access shall be provided to the development from no more than two points on the Beccles Southern Relief Road. Vehicular accesses should also be provided to Ellough Road to serve the employment uses and initial phases of the residential development.”

2.17 Bullet point 12 should also be modified as it is too prescriptive on the location of the school. The criterion should reflect only that the school should be made available at an early stage of the development and that it should be located in such a way as to be accessible not only to the new community but to the existing community reflective of the expectation that it will attract a proportion of its roll from the establish parts of Beccles and Worlingham or from outlying villages.

“The primary school and community hub should be capable of early delivery and have good accessibility from the new and existing community.”

2.18 Similarly, bullet point 13 should be modified to state:

“Any C2 uses and retirement housing should have good accessibility to new services and facilities and be located in proximity to the community hub.”
APPENDIX 1: SPRU'S REGULATION 19 EMPLOYMENT LAND REVIEW SUBMISSIONS
For and on behalf of
Larkfleet Homes Norfolk and Suffolk Ltd

Regulation 19 Detailed Objection on the Employment Land Requirement of Waveney District Council

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1.0 INTRODUCTION

1.1 These Objections to the Local Plan are made by Strategic Planning Research Unit (SPRU) of DLP Planning Ltd on behalf of our client, Larkfleet Homes Norfolk and Suffolk Ltd. The Company is part of the Larkfleet Group, a privately owned housebuilder and developer headquartered in Lincolnshire. Larkfleet have an interest in land west of Ellough Road to the south of Beccles and Worlingham (WLP3.1) and have undertaken a range of engagement exercises – including with the local community, Worlingham Parish Council, Beccles Town Council, Waveney District Council, Suffolk County Council and other key stakeholders - to gauge opinion of the potential development of the site.

1.2 Although the site proposed by Larkfleet has been allocated in the Local Plan, we consider that there are numerous soundness issues specifically with the allocation and with regards to other policies within the Plan. Within this representation we set out soundness issues and the modifications we consider necessary to resolve those issues.

1.3 This report provides an assessment of employment land matters in the Waveney District and a critique of the evidence base that has been prepared to inform and justify policies relating to employment within the Regulation 19 Local Plan.

1.4 In summary, we consider the modifications to Policy WLP3.1 to resolve soundness issues are as follows:

- Modify requirement “Employment development (falling under use classes B1, B2 and B8) (5 hectares).”
- Remove requirement “A landscaped buffer should separate the employment land from housing.”
2.0 NATIONAL POLICY BACKGROUND REGARDING THE STATUS OF EMPLOYMENT LAND

A) National Planning Policy Framework

2.1 The Framework seeks to deliver sustainable economic growth and states that significant weight should be placed on the need to support economic recovery through the planning system, including the delivery of new businesses to contribute towards building a strong, responsive and competitive economy, as well as new homes.

2.2 At paragraph 14, the Framework highlights that:

2.3 “at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking”.

2.4 At paragraph 18, the Framework states that the Government is committed to securing economic growth in order to create jobs and prosperity. It goes on to explain in paragraph 19 that the Government is committed to ensuring that the planning system does everything it can to support economic growth. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of businesses and support an economy fit for the 21st century (paragraph 20).

2.5 The Framework then outlines in paragraph 21 that in drawing up Local Plans, local planning authorities should:

- set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;
- plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
- identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and
- facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

2.6 Paragraph 22 states that planning policies should however avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose and that land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for
the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

2.7 The Framework also states, at paragraph 158, in terms of using a proportionate evidence base, that each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

2.8 Paragraph 161 states that local planning authorities should use this evidence base to assess:

- the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;
- 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.

B) Planning Practice Guidance (‘PPG’)

2.9 The Guidance states that Plan makers should also consider:

- The recent pattern of employment land supply and loss to other uses (based on extant planning permissions and planning applications). This can be generated through a simple assessment of employment land by sub-areas and market segment, where there are distinct property market areas within authorities.
- The existing stock of employment land. This will indicate the demand for and supply of employment land and determine the likely business needs and future market requirements (though it is important to recognise that existing stock may not reflect the future needs of business). Recent statistics on take-up of sites should be consulted at this stage, along with other primary and secondary data sources to gain an understanding of the spatial implications of ‘revealed demand’ for employment land.
- The locational and premises requirements of particular types of business (Paragraph: 030 Reference ID: 2a-030-20140306).

2.10 Paragraph 031 Reference ID: 2a-031-20140306 then states when examining the recent take-up of employment land, it is important to consider projections (based on past trends) and forecasts (based on future scenarios) and identify occurrences where sites have been developed for specialist economic uses. This will help to provide an understanding of the underlying requirements for office, general business and warehousing sites, and (when compared with the overall stock of employment sites) should form the context for appraising individual sites.
2.11 Analysing supply and demand will allow plan makers to identify whether there is a mismatch between quantitative and qualitative supply of and demand for employment sites. This will enable an understanding of which market segments are over-supplied to be derived and those which are undersupplied (NPPG Paragraph 031 Reference ID: 2a-031-20140306).

2.12 Paragraph 032 Reference ID: 2a-032-20140306 outlines how future trends should be forecast. It states that plan makers should consider forecasts of quantitative and qualitative need (i.e. the number of units and amount of floorspace for other uses needed) but also its particular characteristics (e.g. footprint of economic uses and proximity to infrastructure). The key output is an estimate of the scale of future needs, broken down by economic sectors.

2.13 Local authorities should develop an idea of future needs based on a range of data which is current and robust. Authorities will need to take account of business cycles and make use of forecasts and surveys to assess employment land requirements (NPPG Paragraph 032 Reference ID: 2a-032-20140306).

2.14 In terms of what types of employment land is needed, paragraph 033 Reference ID: 2a-033-20140306 states that the increasing diversity of employment generating uses (as evidenced by the decline of manufacturing and rise of services and an increased focus on mixed-use development) requires different policy responses and an appropriate variety of employment sites. The need for rural employment should not be overlooked.

2.15 In respect of labour supply models, which are based on population and economic activity projections the NPPG notes that the underlying population projections can be purely demographic or tied to future housing stock which needs to be assessed separately. Therefore these models normally make predictions for a period of 10 to 15 years, so plan makers should be careful to consider that national economic trends may not automatically translate to particular areas with a distinct employment base (NPPG Paragraph 033 Reference ID: 2a-033-20140306).

2.16 Paragraph 034 Reference ID: 2a-034-20140306 outlines how employment land requirements should be derived: when translating employment and output forecasts into land requirements, there are 4 key relationships which need to be quantified. This information should be used to inform the assessment of land requirements. The 4 key relationships are:

- Standard Industrial Classification sectors to use classes;
- Standard Industrial Classification sectors to type of property;
- employment to floorspace (employment density); and
- floorspace to site area (plot ratio based on industry proxies).

2.17 In terms of core outputs and monitoring, paragraph 035 Reference ID: 2a-035-20140306 advises that plan makers should set out clear conclusions and any assumptions made in reaching these conclusions on the levels of quantitative and qualitative predicted need. This will be an important input into assessing the suitability of sites and the Local Plan preparation process more generally.
2.18 Plan makers will need to consider their existing and emerging housing and economic strategies in light of needs (NPPG Paragraph 035 Reference ID: 2a-035-20140306).


2.19 The draft Framework states at paragraph 8 that the economic objective of sustainable development is to help build a strong, responsive and 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, innovation and improved productivity.

2.20 Paragraph 16 states that Plans should:

   a) be prepared with the objective of contributing to the achievement of sustainable development;

   b) be prepared positively, **in a way that is aspirational but deliverable**;

   c) be shaped by early, proportionate and meaningful engagement between planmakers and communities, local organisations, businesses, infrastructure providers and statutory consultees;

   d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

   e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

   f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant). (DLP Emphasis)

2.21 Bullet D of Paragraph 83 requires that planning policies be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstance.
3.0 Waveney Local Plan Regarding the Provision of Employment Land

A) Identified Need of Employment in Waveney

3.1 The emerging Local Plan sets out a 22-year strategic vision (2014-2036), objectives and the spatial strategy as well as the planning policies and site allocations that will guide future development of the district.

3.2 Within its overall strategic vision, the Local Plan states:

"By 2036 the quality of life for everyone growing up in, living in, working in, and visiting Waveney will have been sustainably improved. Waveney will have a healthy economy, a healthy population and a healthy environment… Waveney will have a stronger, more diverse economy benefiting from the growth of offshore renewable energy and better infrastructure such as transport connections, telecommunications and flood risk protection. The stronger economy will have reduced deprivation and increased local earnings. Tourism will remain an important year-round part of the District’s economy and visitor numbers and overnight stays will have increased. Waveney’s town centres will be vibrant and meet the needs of local residents, businesses and visitors alike."

3.3 The emerging Local Plan seeks to protect and maintain its employment base and enhance it through new provision to accommodate the expected job growth. Policy WLP1.1 (Scale and Location of Growth) specifies that a minimum of 5,000 new jobs will be achieved across the plan period and provision will be made for 43 hectares of employment land for B1/B2/B8 uses as well as 2,200sqm of convenience (food) and 11,000sqm of comparison (non-food) retail floorspace.

3.4 However, this is caveated in paragraph 8.59 of the Local Plan which states that “there is some uncertainty about the number of jobs which need to be planned for and the amount of employment land required to support them. Economic projections themselves at a local level have limitations and cannot foresee new emerging sectors. The additional assumptions in the employment land evidence base around the impact of offshore wind are also uncertain as there are many variables which could affect the total number of jobs and demand for land. The conversion of jobs forecasts to land requirements is also subject to uncertainty as land and floorspace requirements can differ widely between sectors and over time as working patterns change. Furthermore, just because the number of jobs in some sectors decline over time (for example manufacturing) this does not necessarily mean that floorspace requirements will also decline. This is illustrated in the Employment Land Needs Assessment Update which shows that over the period 2001-2016 there was a net increase of over 50 hectares of employment land at the same time as limited growth in jobs.”

3.5 Policy WLP1.1 goes onto state that 60% of employment land development will be in the Lowestoft area, 25% in Beccles and 15% in other market towns and rural areas.
B) Identified Supply of Employment Land in the Emerging Local Plan

3.6 Given the Council identify a need in the emerging Local Plan of 43 hectares, it is unclear as to why 85.71 gross hectares of identified land (see Table 1) has been allocated for employment purposes (B1, B2, B8). This is also higher than the claimed 53.6 net hectares the Council consider to be allocated in this emerging Local Plan (paragraph 1.13).

3.7 Table 1 below has been collated by SPRU to provide a comprehensive list of all allocations in the emerging Local Plan which make provision for employment land. Using the SHELAA, we have been able to ascertain the net developable area remaining for each site and this is outlined in the fourth column. This suggests a total of 54.96 net hectares allocated for employment purposes.

3.8 The breakdown is as follows:

Table 1

<table>
<thead>
<tr>
<th>Location</th>
<th>Amount of New Employment Floorspace Proposed in the Emerging Local Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Lowestoft Area</strong></td>
<td></td>
</tr>
<tr>
<td>WLP2.2 - Power Park</td>
<td>23.37ha</td>
</tr>
<tr>
<td>WLP2.4 - Kirkley Waterfront</td>
<td>7.5ha</td>
</tr>
<tr>
<td>WLP2.13 - North of Lowestoft Garden Village</td>
<td>8ha</td>
</tr>
<tr>
<td>WLP2.17 - Land at South Lowestoft Industrial Estate</td>
<td>20ha</td>
</tr>
<tr>
<td>WLP2.18 - Land at Mobbs Way, Oulton</td>
<td>2.80ha</td>
</tr>
<tr>
<td>WLP2.6 - Lake Lothing</td>
<td>Unidentified provision</td>
</tr>
<tr>
<td><strong>Sub Total</strong></td>
<td>61.67ha</td>
</tr>
<tr>
<td><strong>Becles and Worlingham</strong></td>
<td></td>
</tr>
<tr>
<td>WLP3.1 - Becles and Worlingham Garden neighbourhood</td>
<td>5ha</td>
</tr>
<tr>
<td>WLP3.3 - Land South of Benacre Road, Ellough</td>
<td>13.40ha</td>
</tr>
<tr>
<td><strong>Sub Total</strong></td>
<td>18.40ha</td>
</tr>
<tr>
<td>WLP4.6 - Broadway Farm, Halesworth</td>
<td>2.64ha</td>
</tr>
<tr>
<td>WLP5.2 - Land West of St Johns Road, Bungay</td>
<td>3ha</td>
</tr>
<tr>
<td><strong>Sub Total</strong></td>
<td>5.64ha</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>85.71ha (plus undefined provision at WLP2.6)</td>
</tr>
</tbody>
</table>
3.9 This proposed provision is higher than the need identified in the ELNAU.

3.10 The 2017 Employment Land Needs Assessment Update outlines that on average, 3.54 hectares per year has been developed for employment uses. This suggests that after removing the employment element for WLP3.1, there is an identified provision in the Local Plan for 49.96ha. This remains 6.96 ha above the need identified and divided by the average take up figure of 3.54 hectares per annum, results in an oversupply of a further two years beyond the Plan period. This confirms that without an employment land contribution from WLP3.1, Waveney are able to demonstrate 24 years of supply.
4.0 WAVENEY LOCAL PLAN EVIDENCE BASE

A) Need Identified in the Employment Land Needs Assessment Update (2017) (ELNAU)

4.1 Employment land is defined within the ELNAU as falling within use classes B1, B2 and B8 of the Use Classes Order.

4.2 The Employment Land Needs Assessment Update (2017) (ELNAU) is based on the previous 2016 Assessment by NLP and outlines by way of an update that the various scenarios of employment forecasts range from 3,431 to 5,000 new jobs over the plan period 2014-2036 but advise that the higher figure of 5,000 is planned for to include the uplift for the potential benefits from the expansion of offshore wind in the southern North Sea as modelled by Experian.

4.3 Paragraph 5.4 of the ELNAU outlines that over the last 15 years, 91,490sqm of employment floorspace has been completed, an average of 6,099sqm a year and that if this trend continues over the plan period, there would be a need for 33.54 hectares of employment land based on past trends.

4.4 Paragraph 7.2 of the ELNAU goes onto conclude that at least 9ha of employment floorspace is needed across the plan period to account for a predicted increase of 500 new jobs (B class jobs growth) requiring employment land to total 43 hectares of employment land provision, yet as paragraph xx demonstrates, almost double the provision is made for employment land in allocations (B1, B2 B8), totalling 85.71 hectares.


4.5 The 2016 Employment Land Needs Assessment calculates that at the end of March 2014, there was 97.93 hectares of employment land available for development in the Waveney Economic Area with the following breakdown:

Table 2 Table 5.4 of ELNAU (2016) Showing Available Employment Land in Waveney

<table>
<thead>
<tr>
<th>Sub Area</th>
<th>Allocated Sites (ha)</th>
<th>Sites with Planning Permission (ha)</th>
<th>Vacant Land within Employment Areas (ha)</th>
<th>Total (ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lowestoft</td>
<td>34.00</td>
<td>6.51</td>
<td>5.39</td>
<td>45.90</td>
</tr>
<tr>
<td>Beccles</td>
<td>14.01</td>
<td>15.45</td>
<td>0.99</td>
<td>30.45</td>
</tr>
<tr>
<td>Bungay</td>
<td>4.00</td>
<td>0.71</td>
<td>0</td>
<td>4.71</td>
</tr>
<tr>
<td>Halesworth</td>
<td>12.25</td>
<td>1.45</td>
<td>0</td>
<td>13.70</td>
</tr>
<tr>
<td>Southwold</td>
<td>0.70</td>
<td>2.47</td>
<td>0</td>
<td>3.17</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>64.96</strong></td>
<td><strong>26.59</strong></td>
<td><strong>6.38</strong></td>
<td><strong>97.93</strong></td>
</tr>
</tbody>
</table>

4.6 Table 1 above suggests that the need for employment land of 43 hectares can already be met by existing identified supply and there is no need for such a large proportion of employment land to be allocated in the emerging Local Plan. It is not clear whether this is in addition to the above table, or inclusive of.

1 It is not clear which Plan these sites are allocated in
5.0 ASSESSMENT OF THE COUNCIL’S APPROACH

5.1 Paragraph 22 of the Framework warns against over-allocating employment land, especially where there is no reasonable prospect of a site being used for that purpose which might otherwise be used for other uses. Specifically it states that “Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”

5.2 It would seem illogical and counter to national policy to ‘allocate’ or ‘require’ a specific proportion of a site if there is already little prospect of it coming forward during the Plan period. The Plan allocated 54.96 hectares of employment land (plus the unidentified provision at WLP2.6. If WLP3.1 is removed, then 49.96ha is available; the need can still be met without a contribution from our site.

5.3 The Government’s Planning Policy Practice Guidance offers a similarly methodological approach to defining economic and housing needs where the two are actually covered in the same section – indicating clearly that the two are regarded as complimentary and therefore should be co-ordinated and consistent.

5.4 Our client is supportive of a growth led strategy, but this must be consistent with the housing policies proposed in the Local Plan if it is to be found consistent, robust and ‘sound’.

5.5 The PPG requires plan makers to consider the past take-up of employment land and future property market requirements (Paragraph 032, ID: 2a-032-20140306). This has informed the conclusions of the ELNAU which suggests a requirement of 43 hectares. In the 2016 ELNAU, the report identified an existing supply of some 97.93 hectares which more than accommodates the need identified in the 2017 Update.

A) WLP3.1 Beccles and Worlingham Garden Neighbourhood

5.6 Our client’s site forms part of proposed allocation WLP3.1 of which the Council has allocated 5 hectares for employment land purposes. This report has demonstrated that there is no need for employment land to be allocated on this site as the Council has vastly overallocated land for employment uses.
6.0 CONCLUSION

6.1 These objections to the Local Plan are made by Strategic Planning Research Unit (SPRU) of DLP Planning Ltd on behalf of Larkfleet Homes Norfolk and Suffolk Ltd. The Company is part of the Larkfleet Group, a privately-owned housebuilder and developer.

6.2 Larkfleet have an interest in land west of Ellough Road to the south of Beccles and Worlingham (WLP3.1) and we consider this sound subject to the resolution of a number of detailed soundness issues.

6.3 This objection provides an assessment of employment land issues in Waveney District and a critique of the evidence base that has been prepared to inform and justify policies relating to employment within the Regulation 19 Local Plan.

6.4 SPRU have demonstrated that the Council have significantly over allocated land for employment uses and consider that the five hectares of employment land allocated under proposed policy WLP3.1 (Beccles and Worlingham Garden Neighbourhood) is not a necessary requirement of the Local Plan. It may be considered contrary to paragraph 22 of the Framework which states that planning policies should “avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”

6.5 Accordingly, we consider that modifications to Policy WLP3.1 to resolve soundness issues would be to delete reference to the provision of employment within the area of WLP3.1.

6.6 Notwithstanding this we note the intention of the Local Plan to promote WLP3.1 as a mixed-use garden neighbourhood. As such an element of employment would support the creation of a self-contained neighbourhood however it is our view that the location, nature and type of development indicates that should employment be brought forward on the site it should be limited to use class B1(a) and (b) compatible with its predominantly residential surroundings. No minimum land requirement should be referred to.

- Modify requirement “Employment development (falling under use classes B1 (a) and (b))”
- Remove requirement “A landscaped buffer should separate the employment land from housing.”