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North Norfolk District Council

# **Background Paper 3**

# **Approach to Employment**

A non-technical guide which explains the approach that North Norfolk District Council is taking to establish the available capacity for employment growth and set an employment land target in the new North Norfolk Local Plan 2016-2036

Publication Stage Regulation 19, January 2022

Background Paper 3	Approach to Employment
National Legislation and Guidance	<ul style="list-style-type: none"> <li>• National Planning Policy Framework (2021)</li> <li>• National Planning Policy Guidance</li> <li>• Town and Country Planning Acts</li> </ul>
Related Evidence	<ul style="list-style-type: none"> <li>• Growth Sites Delivery Strategy 2021, NNDC</li> <li>• North Norfolk Housing and Economic Land Availability Assessment (HELAA) Part 2 – Assessment of Employment Land (2018)</li> <li>• Business Growth and Investment Opportunities Study (2015)</li> <li>• East of England Forecasting Model (EEFM), 2019</li> <li>• North Norfolk Settlement Profiles (2018), Updated 2021</li> <li>• National Population and Household Projections, ONS.</li> </ul>

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 Braille, audio, large print or in other language**

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## 1. Purpose

- 1.1. This document is one of a number of Background Papers which have been prepared to help explain and justify various aspects of the new Local Plan Proposed Submission Version Publication Stage Regulation 19 (hereafter 'the Local Plan') which is being produced by North Norfolk District Council. This updates the previous version published to support the regulation 18 consultation.
- 1.2. It is not the purpose of this document to repeat all the evidence that the Council has relied upon when preparing the Local Plan. This evidence has been separately published and is available on the Council's web site. However, where appropriate, this document refers to various sources of evidence, and provides a summary or explanation of how these sources have been considered.
- 1.3. The Local Plan sets out the key elements for the planning framework for North Norfolk covering the period 2016 to 2036. One of the main elements of the Local Plan is the approach to employment and the allocation of employment land within the District. It is important to ensure that over the lifetime of the plan period there is sufficient employment land available to allow for flexibility and choice of development sites across the District. The absence of suitable sites should not hold back employment growth.
- 1.4. **The purpose** of this Paper is to provide a non-technical guide which explains the approach that North Norfolk District Council is taking to employment growth, and which 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.
- 1.5. The paper is informed by the National Planning Policy Framework (NPPF), the North Norfolk Growth Sites Delivery Strategy, 2021 and the Council's subsequent employment boundary review October 2021. The Norfolk Growth Sites Delivery Strategy 2021 provides an up-to-date assessment of the supply and demand for employment land in the District, looking at the available employment allocations and existing employment areas in order to understand the supply side, and reviews the property market, consulting with local stakeholders and critiquing the market to understand the demand side. The study reviews the employment land requirements in North Norfolk to 2036 through an assessment of four forecasting scenarios: 'past land take up', 'labour demand forecasting', 'labour supply forecasting' and 'policy on labour demand forecasting' and recommends that 'past land take up' is the preferred scenario upon which to plan for employment land to 2036.
- 1.6. Chapter 6 of this paper contains the Council's review of employment site boundaries and provides the evidence for the subsequent boundary amendments detailed on the policies mapping and confirms the amount of land on existing employment areas that is available for future development.
- 1.7. This background paper updates the previous background paper, published at Regulation 18 stage, which was based on the Core Strategy, the Housing and Economic Land Availability Assessment (Part 2) 2017 (HELAA), a review of the

suitability of existing employment designations and allocations, and informed by the Business Growth and Investment Opportunities Study 2015.

- 1.8. In terms of national policy, Paragraph 82 of the NPPF<sup>1</sup>, makes clear that planning policies should set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. However, it is also important to recognise that, as set out within Paragraph 122 of the NPPF, there is a need for local planning authorities to review land allocated within Plans and review land availability. Where there is no reasonable prospect of an application coming forward for the use allocated in a Plan, the local planning authority should re-allocate the land for a more deliverable use that can help to address identified needs. It is important that each of the previous designations, previous allocations and proposed allocations are in conformity with national planning policy.
- 1.9. The purpose of Policy E1: Employment Land, is primarily to ensure that there is a sufficient quantity of land reserved for employment generating development across the District. Policy E2: Employment Areas, Enterprise Zones & Former Airbases sets out the Council's approach to ensuring that employment land within designated employment uses is protected for acceptable employment uses.
- 1.10. Policy E3: Employment Development Outside of Employment Areas sets out the approach to the support of employment growth outside designated employment areas while Policy E4: Retail & Town Centre Development seeks to ensure retail growth is focused on maintaining the vitality and viability of the District's town centres.

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<sup>1</sup> [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

## 2 Area Overview

- 2.1 North Norfolk has a narrow economic base with employment<sup>2</sup> in the Accommodation and Food (13.7%), Retail, (12.3%), Health, (11%) Manufacturing (8.9%), Agriculture, Forestry and Fishing (7.5%), Education (7.5%), Arts, Entertainment and Recreation (6.2%), Construction (5.5%), Professional, Scientific and Technical (4.8%) and Business Administration and Support Services (4.5%), Public Administration and Defence (3.1%). The Growth Sites Delivery Strategy 2021 reports that the accommodation and food and retail sectors account for the largest number of employees, at 13.7%, some 5,000 employees and 12.3%, some 4,500 employees, respectively. This is higher than both the regional and national averages in these sectors. The health sector employs 11.0% of the workforce, the third highest behind retail and accommodation and food. Although not the highest percentage for the area, the agriculture, forestry and fishing sector employ 7.5% of North Norfolk employees, this is almost 3% higher than regional averages and more than 6% higher than national averages.
- 2.2 In North Norfolk, the majority of businesses comprise 0-4 employees (73.3%) which is slightly below the regional average of 75.4% and below the national average of 78.8%<sup>3</sup>. The highest proportion of businesses in the District can be found within the 'Agriculture, forestry and fishing' sector (14.5%). This is the most populous sector in terms of number of businesses. The number of employees in this sector, as stated above, is only 7.5%, highlighting that this sector is comprised of many businesses each employing, on average, a small number of workers.
- 2.3 In North Norfolk (pre pandemic) as of the 2011 Census, 3,754 were counted as working mainly at or from home (5.3%). This figure comprises 17% of the working age population in active employment. This proportion is above both levels seen in Norfolk as a whole (3.8%) and England (3.5%). Indicating that working from home plays quite a large role in North Norfolk, influenced by its large rural topography.
- 2.4 Employment forecasts over the plan period from the East of England Forecasting Model 2019 (EEFM), predict employment growth concentrated in the following sectors: accommodation and food services (+1,980 jobs) retail (+ 1,000 jobs), health and care (+809 jobs) and construction (+534 jobs) and professional services (+457 jobs). However, some sectors are forecasted to decline, with the largest declines expected in agriculture (-1,410 jobs) and manufacturing (-970 jobs). Collectively though the employment base is projected to grow from 43,176 to 45,804 jobs, an increase of 2,628.<sup>4</sup> Due to the Influence of Covid-19 the employment growth trajectory to 2036 forecast in the EEFM is likely to be altered significantly in the short term, with lower employment. While in the longer term the trajectory is thought likely to return to a similar growth path, given the short-term shock, but this path will be from a lower base.
- 2.5 Rates of unemployment in the District are influenced by a seasonal dimension in line with employment opportunities which in terms of choice and quality, remain limited. North Norfolk had a comparatively high rate of unemployment based on data from October 2019 – September 2020 when compared to other Norfolk Districts

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<sup>2</sup> Growth Sites Delivery Strategy 2021, NNDC – Table 4

<sup>3</sup> Growth Sites Delivery Strategy 2021, NNDC – Table 5

<sup>4</sup> Growth Sites Delivery Strategy 2021, NNDC – Table 9

Table 1: Unemployment and Economic Activity Rates, October 2019 - September 2020

Area	Unemployment Rate (%)	Economic Activity Rate (%)
Breckland	8.5	86.5
Broadland	4.1	85.2
Great Yarmouth	5.6	71.3
King's Lynn & West Norfolk	2.9	83.9
<b>North Norfolk</b>	<b>8.8</b>	<b>80.4</b>
Norwich	2.3	78.3
South Norfolk	2.0	78.5
Norfolk County	4.6	84.3
England	4.4	79.4

Source: Table 1 Growth Sites delivery Strategy 2021, based on ONS Annual Population Survey, 2021

- 2.6 Unemployment amongst the economically active are recorded as 3.3% 2021. In comparison to 3.9% on a regional basis and 4.6% nationally for England<sup>5</sup>.
- 2.7 The District has a growing and large proportion of elderly and retired people. Approximately 34% of the population are elderly and those of younger working age, 16 – 49 years of age are underrepresented in comparison to Norfolk and England. With many young people leaving the District for increased employment prospects, and the over 65 age cohort forecasted to be the primary driver of population growth in the plan period, this age mix has implications for employment land premises demand, as well as the provision of services and there is growing concern that businesses will be unable to recruit and attract staff. There is, therefore, an aspiration to broaden the economy to offer a wider choice of employment opportunities and achieve a more balanced economy and population in the future.
- 2.8 There is a reasonable supply of industrial premises in North Norfolk which are at a similar level to the surrounding areas, 1,360 units are identified in the 2021 Growth Sites Delivery Strategy, with Kings Lynn and West Norfolk Borough having 1,380 units and Norwich 1,390. In terms of offices, North Norfolk has the lowest amount at 400 units, significantly below Norwich which has 1,740, but similar, although below the numbers, in the surrounding rural Districts. In terms of office and industrial premises by floorspace, North Norfolk has the lowest amount of floorspace for both unit types in the region. As of 2019, North Norfolk contained some 543,000 sqm of industrial floorspace and 37,000 sqm of office floorspace. In comparison Breckland had 1,068,000 sqm industrial and 44,000 sqm office floorspace.<sup>6</sup>
- 2.9 Historically the commercial property market in North Norfolk, in common with many peripheral rural areas of the country, has been relatively weak, with modest rates of

<sup>5</sup> ([nomisweb.co.uk](https://www.nomisweb.co.uk/livelihoods/16186.xlsx)) <https://www.nomisweb.co.uk/livelihoods/16186.xlsx>

<sup>6</sup> Growth Sites Delivery Strategy, 2021 - Table 6



employment related development on greenfield sites in recent times. However, there has been an intensification of uses within established industrial areas and a turnover of commercial property to the point that many industrial estates/areas are now nearly and/or fully developed. At the time of the Growth Sites Delivery Strategy, 10 industrial premises were being marketed as available with North Norfolk, comprising 4,815 sqm floorspace; three business parks/industrial estates/enterprise parks were being marketed offering a total of 11,609 sqm floorspace. There were also 21 office premises being marketed within North Norfolk, totalling 1,180 sqm floorspace. All office units were individually offering less than 200 sqm floorspace. In comparing this to the overall floorspace as recorded by the Valuation Office, VOA (9,209,000 sqm), this demonstrates that there is a limited choice and constrained supply in the District and equates to an occupancy rate of 99%.<sup>7</sup>

- 2.10 The Housing and Economic Land Availability Assessment (HELAA) Part 2, indicated that in 2018 there was approximately 40 hectares (ha) of employment land remaining to be built out. This was refined through site assessment in the Business Growth Study, 2021 to 61.32 ha and further refined through a review of employment site boundaries which took into account more recent planning permissions and local constraints to establish the base line position of 54.06 ha available employment land in the District
- 2.11 Past trends indicate that on average 1.6 ha per year of employment land have been taken up. On this basis, there is enough pipeline supply in theory to ensure that the District can meet its need for approximately 28 years. This potentially presents a misleading picture as the available land may not be suitable or suitably located in order to meet the range of employment opportunities within the market. To address this, the Council's approach is to ensure quality, quantity and distribution through additional allocations (employment and mixed-use) and to allow for a level of growth outside the designated employment areas. This approach is considered to ensure that there are opportunities for employment within the District to meet the needs today and throughout the plan period.
- 2.12 Commuting patterns in North Norfolk show a net outflow of workers from the District, predominantly to other areas of the County, particularly Norwich. Despite the overall net outflow of workers from the District, 70.5% of workers that make up the North Norfolk workforce reside in the District and 63.3% of employed residents of North Norfolk also work within 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.
- 2.13 This data broadly illustrates that the District functions as three separate sub areas. The **eastern area** of the District has a greater relationship to Great Yarmouth, Norwich and the Broads. This area covers North Walsham, Stalham, Hoveton and their surrounds. 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

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<sup>7</sup> Growth Sites Delivery Strategy, 2021 - Para 4.34 – 4.37

growth in these sectors in North Walsham and Catfield. 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.

- 2.14 The **western area** of the District has a greater relationship with Kings Lynn and the south. This area of the District covers Fakenham and Wells-next-the-Sea. 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. 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 Egmere Enterprise Zone and Tattersett Business Park, two rural locations that have been available for several years, with only limited take-up.
- 2.15 The **central area** covers the town of Cromer, Holt and Sheringham and is largely self-contained in terms of employment and acts as a more localised market. Tourism is the dominant sector 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. Evidence within the 2015 Business Growth and Investment Opportunities Study, Retail and Main Town Centre Uses Study 2017 and the 2021 Growth Sites Delivery Strategy shows that the towns of Cromer, Holt and Sheringham function as a network in terms of movement for employment between the towns. Within this sub region the significant majority of the available land is within Holt. This land would be servicing the Central sub-region as a whole, providing alternatives for other settlements that have more limited choice, most notably the limited supply in Cromer. The 2021 Growth Sites Delivery Strategy concludes that it *is appropriate that the Central sub-region has the lowest share of available land;* Para 6.8.

## Town by Town Analysis

- 2.16 **North Walsham** has strong links with Norwich, with the close proximity of the city encouraging high levels of out commuting for jobs and other services and acting as a discouragement to inward investment. The 2015 Business Growth and Investment Opportunities Study sets out that approximately 50% of the workers within North Walsham are within the same MSOA (Middle Layer Super Output Area), meaning they are located within the town or the immediate surrounding area.

- 2.17 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. The town's industrial businesses are focused on manufacturing of machinery and equipment, plastics products and metal fabrication. The 2015 Business Growth and Investment Opportunities Study sets out that North Walsham's industrial estates are reaching capacity and further employment land would be required to be available to the market in the short term to ensure continuity of the town's growth. The study also states that there is a critical constraint in the market in Norwich Walsham for both built premises and employment land.
- 2.18 As a result, it is proposed through the Local Plan to allocate at least 7 ha of employment land through the large urban extension to the west of the town and a further 2 ha at Norwich Road and expand the current employment designation EMP15 to the northwest of the town, off Cornish Way, by approximately 2.4 ha in order to provide further employment land and improved access to the site. As part of the previous Norwich Road allocation, employment land that has yet to be brought forward is also proposed to be designated as Employment Land. In addition, following the 2021 boundary review, EMP15 has been extended at its north-eastern corner to fully incorporate the logical boundary of the Industrial Site. The designated area has also been extended to incorporate various permissions for industrial uses, primarily a waste transfer station, adding a further 5 ha to the designated employment site. For more information see section 5.
- 2.19 **Stalham** is heavily dependent on Norwich and new development is unlikely to change this. Through the Local Development Framework (LDF), land was allocated for employment use within Stalham (E12), and this has yet to be delivered and its availability is no longer confirmed. The 2015 Business Growth and Investment Opportunities Study categorises Stalham and **Catfield** together. The study states that the Catfield estate provides a reasonable level of floorspace, and currently has the greatest level of vacant stock to meet needs. The study recommends that there is potential infill development of the remaining land, and that no intervention is required.
- 2.20 Through the Local Plan, it is proposed to re-allocate the remaining part of the previous 2011 allocation ST01 with land amounting not less than 1 hectare of employment land in this mixed use allocation. The previous 2011 employment allocation E12 has not come forward and is not proposed to be taken forward into the Local Plan. Collectively the approach, along with that contained in the Broads Local Plan (adopted May 2019), is considered sufficient to meet the local employment needs in the area over the Plan period.
- 2.21 **Hoveton** has a limited supply of allocated employment land, a small site on the Stalham Road, EMP13 is fully developed whilst part of the site on the Tunstead Road, EMP12 is subject to a residential planning permission and the boundary review removes this from the designated employment site EMP12. Whilst there are diverse employment opportunities in the village, retailing and boatbuilding/hiring and industrial are significant sectors. As with other settlements in this part of the District, the close proximity of Norwich may act as a discouragement to inward investment. The railway provides convenient access to Norwich and main line connections to London and the South East.

- 2.22 **Cromer** has historically seen demand for employment land and the majority of the existing designated areas are now developed. However, the town's economy is not so reliant on industrial development with large number of jobs in retailing, tourism and the public sector. There are a small number of industrial sites on the Holt Road Estate, but these may be difficult to bring forward due to either physical or ownership constraints. It is proposed that existing employment designations should be retained.
- 2.23 According to the 2015 Business Growth and Investment Opportunities Study, Cromer has no employment land to meet current or future need. The town has seen limited development since 2006 amounting to around 860sqm floorspace, but this low level may well be a consequence of the lack of available land, and there has been market activity such as the acquisition of the former Cromer Crab site by Structure Flex, demonstrating demand. The study goes on to conclude that take-up rates in recent years have probably been depressed due to a lack of supply of appropriate stock as well as lower demand than places such as North Walsham and Fakenham.
- 2.24 The 2015 study emphasises that businesses looking to establish a presence in Cromer, either through locating in built stock or building new premises, would have very few options. The 2021 Growth Sites Delivery Strategy review similarly concludes that opportunities are limited and are restricted to intensification and reuse. Some redevelopment opportunities do exist and are available, though these have been mooted for redevelopment for a long time.
- 2.25 Whilst it is acknowledged in the study that there is a need for employment land at Cromer, it is also understood that there are fundamental environmental constraints with regard to sites. As Holt, Cromer and Sheringham function as a cluster in terms of employment land and are considered to operate as a localised market, it is considered that land at Holt be proposed in the Local Plan to support the need in Cromer.
- 2.26 **Holt** is a significant net importer of employees from the surrounding areas, with 42% of the workforce living outside of Holt and the immediate area, but from within the District itself. There is an inter-relationship between Holt, Sheringham and Cromer in terms of the workforce.
- 2.27 There is market demand for employment land within Holt although there has been limited employment development in recent times. The Heath Road site is currently being developed, which provides an additional access onto the A148 and further employment land. It is proposed that this site is extended through the Local Plan with the addition of further employment land to help meet the needs of the Holt, Sheringham and Cromer area. (Proposed Allocation H27/1)
- 2.28 **Sheringham** has a limited supply of employment land. There is little demand for new industrial development within the town. The undeveloped element of the employment allocation in the town is in an environmentally sensitive location and poorly related to other developed areas. Approximately 57.2% of the working population find employment in the town but this is often in low paid sectors. The town is therefore a significant net exporter of employees, but many access jobs in nearby Holt and Cromer. Due to the environmental constraints and lack of market demand in the town for new industrial land, no further allocations are proposed through the Local Plan.

- 2.29 **Fakenham** offers a strong opportunity for sustainable development, building off its existing high level of self-containment and its role as an employment centre for surrounding settlements. A high proportion, approximately 65% of those working within the town, live within the District. Fakenham employs approximately 4,573 employees, approximately 1,400 of these work within the manufacturing sector. Through the 2011 Site Allocations Development Plan Document (DPD) a large mixed use allocation was proposed to the north of the town, encompassing a significant proportion of employment land. The 2015 Business Growth and Investment Opportunities Study sets out that the employment land allocated through the adopted Plan would provide sufficient employment land over the plan period. Therefore, through the Local Plan, it is proposed to designate the employment land that was previously allocated and no new employment allocations are made. This, alongside the protection of existing employment land, and the Enterprise Zone at Egmere and Tattersett Business Park should help to offer choice and flexibility to the market over the plan period in this western sub region.
- 2.30 **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. Consequently, it is recommended that the existing allocation be retained to ensure that any future demand can be met.

## Other Areas

- 2.31 The District has four redundant defence establishments: Coltishall Airbase, Neatishead (part), Sculthorpe Airbase (part) and West Raynham, which include large areas of brownfield land and have a certain place in North Norfolk's history. Sculthorpe, West Raynham and Coltishall provide significant levels of existing housing but lack the key services and facilities which would make them suitable locations for new housing development. Due to the more isolated location of these sites any further development would lead to increased car journeys and would not be in conformity with the settlement hierarchy and approach to sustainable development. However, it is also recognised that these locations represent an under-used resource within the District and the Council wishes to support the re-use for appropriate uses.
- 2.32 Land at the former RAF Coltishall airbase was purchased by Norfolk County Council in 2014 and rebranded **Scottow Enterprise Park**. The site received official Enterprise Zone status in April 2016, one of ten sites promoted by the New Anglia Local Enterprise Partnership (LEP). It is proposed through the Local Plan to retain the designation of Scottow Enterprise Park as an 'Enterprise Zone'.
- 2.33 **Walsingham Egmere** is situated between Fakenham and Wells-next-the-Sea in the centre of the District. The site received official Enterprise Zone status in April 2016, one of ten sites promoted by the New Anglia LEP. It is proposed through the Local Plan to retain the designation of Egmere Enterprise Park as an 'Enterprise Zone'.
- 2.34 **Tattersett Business Park** is located on the former RAF Sculthorpe airbase. Following the closure of the airbase a number of proposals for the re-use of former airbase buildings on the site have been supported by the Council. The Council have,

however, not been supportive of proposals which would require the erection of new buildings. The site was allocated through the Site Allocations DPD 2011 as a result of Core Strategy Policy SS2, which states that 'one or more employment allocations will be identified for employment uses that cannot be accommodated on other employment land owing to environmental or operational reasons'. The Local Plan proposes to continue with that approach and to encourage comprehensive redevelopment for employment provision.

## Local Plan Approach

- 2.35 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 to align with the strategic growth ambitions. These employment sites represent clusters of well-established uses (within Use Classes E(g), B2 and B8 of the Town and Country Planning (Use Classes) Order 1987 as amended) in the most sustainable locations. However, in such a rural District, smaller areas of employment exist and these businesses remain important to the local economy and it remains necessary to also provide some new land allocations to provide local opportunities and choice.
- 2.36 A number of the Local Plan proposed policies cover these areas: Policy E1: Employment Land, sets out the quantum of employment land for employment generating development across the District. Policy E2: Employment Areas, Enterprise Zones & Former Airbases sets out the Council's approach to ensuring that employment land within designated employment uses is protected for acceptable employment use. Policy E3: Employment Development Outside of Employment Areas sets out the approach to the support of employment growth outside designated employment areas. The approach seeks to support appropriate growth where it is demonstrated that there is no suitable, available land on the designated employment sites and where there are specific reasons, such as the expansion of an existing business, or it is required elsewhere due to locational / use circumstances e.g. agricultural development. Policy E4: Retail & Town Centre Development seeks to ensure retail growth is focused on maintaining the vitality and viability of the District's town centres. The approach supports the national sequential approach and directs main town centre uses through the identification of a Retail Hierarchy, Primary Shopping Areas and Town Centre Boundaries. A suite of policies also cover new and existing tourism related development, such as static caravans, touring caravan & camping sites, new tourist attractions and the supply and mix of tourism accommodation. Such policies sit outside the scope of this background paper.

### 3 Employment Areas

- 3.1 Employment Areas were designated in 2009 with the adoption of the Core Strategy and shown on the policies map. The policy text states that:

*'only employment generating development proposals will be permitted on such sites, retail, warehousing and hotels may be permitted providing that there is no sequentially preferable site available.'*

The policy also states that a number of new employment allocations will be made either wholly employment or part of a mixed use scheme. These were subsequently identified through the Site Allocations DPD adopted in 2011.

- 3.2 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.
- 3.3 The emerging approach within the Local Plan, 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.<sup>8</sup>
- 3.4 Given the changing landscape of national policy and the diversifying economy, coupled with the ambition to broaden the economic base of the District an element of flexibility is proposed to be included in the Local Plan. The fundamental principles, however, remain consistent: The policy seeks to ensure that employment generating uses that fall into B Class Uses and Class E(g)<sup>9</sup> on these sites are supported and where non-B Class Uses are proposed these must be compatible with, and not constrain the operations of, adjoining businesses.
- 3.5 The emerging policies E1 and E2 of the proposed submission version of the Local Plan ensure there is sufficient quantity of land to meet employment generating development across the District and ensure such land is protected for such uses where they would not be in conflict with the existing B Class Uses and where there are no sequentially preferable sites.
- 3.6 The supporting text of emerging Policy E2, proposed submission version Local plan states that:

*'The policy allows for mixed use developments to reflect the level of flexibility set out within the NPPF. Mixed use developments may include elements of development that do not fall within the B2 and B8 Use Classes such as trade counters and potentially care/nursing homes, all of which create job opportunity. Proposals for Main Town Centre Uses (as defined in the glossary of the NPPF) will*

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<sup>8</sup> Table 7 and appendix 1 include the breakdown of the previous employment /mixed use allocations taken forward as employment designations.

<sup>9</sup> Class B – B2, General industrial, B8, Storage and Distribution, E(g)(i)- Offices to carry out any operational or administrative functions, E(g)(ii) - Research and development of products or processes, E(g)(iii) Industrial processes.

*not be supported on designated employment land unless it is first demonstrated that no suitable Town Centre, or edge of centre, sites are available through an appropriate and proportionate sequential test.'*

The policy itself sets a number of decision making criteria, including the consideration of traffic and wider amenity & health impacts, the scale of development, as well as the demonstration of no sequentially preferable site being available in the case of main town centre uses.

## New Employment Area Designations

- 3.7 A number of mixed-use development sites were previously allocated in the Site Allocations DPD 2011. These set out a quantum of employment land in a particular site allocation policy but did not define a particular Employment Area. The majority of employment areas relating to former mixed-use allocations are now defined and designated as additional Employment Areas. In most cases these have subsequently had suitable employment applications. Table 7 and Appendix 1 reference where a previous employment /mixed use allocation site has been taken forward as a new employment designation.
- 3.8 A full breakdown of New Designated/Allocated land and total Employment land across the District is detailed in **Appendix 1**.
- 3.9 In establishing the quantum of available land on the Employment Areas, all the Employment Areas were subject to detailed review and assessment through the Local Plan process as detailed below and supported through the Growth Sites Delivery Strategy 2021. It is considered that the assessment of the sites within these documents provides robust justification for establishing the quantum of need, supply and retaining the Employment Areas within the Local Plan.



## 4 Establishing the requirements for future growth within the District

- 4.1 The 2021 Growth Sites Delivery Strategy provides the justification for the approach around future employment land requirements. The strategy reviews a range of scenarios '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. These scenarios give a range of employment land need from 8.1 ha under the 'Labour Demand Forecasting' scenario to 40 ha under the 'Past Land Take-up' scenario, (including a 5 year buffer).
- 4.2 Past Land take up: This reviews the actual take-up of employment land in North Norfolk over time and uses the average of past take-up to extrapolate forward. This approach assumes that the characteristics of the demand for employment land will be comparable to the recent past. The study utilises a 1.6 ha annual average since 2000 as identified through the 2019 Annual Monitoring Report on employment land take up from Norfolk County Council. Adopting this approach would indicate that a minimum of 36 ha of employment land would be needed up until 2036. Factoring in potential fluctuations in the market and flexibility through choice, an additional buffer of 8 ha is added on, equivalent to a five years take up rate which brings the recommended **requirement to 40.0 ha under this scenario**.
- 4.3 Labour Demand Forecasting: This relies on the econometric forecasts of the East of England model, 2019 (EEFM) which projects the likely jobs growth in different industry sectors. The jobs figures are then translated to land using a formula based on jobs to floorspace density, which in turn can be translated into the projected land need.
- 4.4 The EEFM 2019, projects that North Norfolk will have an increase in employment numbers between 2016 and 2036 of about 1,880 jobs. However, this increase is not uniform between the sectors, with key B-class sectors (as detailed in section 2, Para 2.4), such as manufacturing, forecast to have a decline in employment numbers. This infers that there would be a negative demand for employment land related to Class B use or approx. 3.7 ha over the plan period.

Table 2: East of England Forecasts for B-class Employment Floorspace, 2016-2036

Floorspace Type	Change in Demand 2016-36 (sqm)
B1a Office (now Eg(i))	+5,200
B1c/B2 Industrial	-27,900
B8 Warehousing	+7,900
Total	-14,800

Source: *Growth Sites Delivery Strategy 2021 - East of England Forecasting Model, 2019*

- 4.5 A number of sectors are however expected to grow e.g. accommodation and food services, retail, health & care, construction and professional services. Factoring in such growth the Growth Sites Delivery Strategy concludes that the employment land requirement from this labour demand approach would be 6.5 ha between 2016 and 2036. Allowing for a buffer equivalent to five years of growth, **the employment land requirement would be 8.1 ha.** However, the study also reports on reservations with this model and considers the findings of the scenario underestimate land demand through not factoring in unmet demand for employment floorspace from local manufacturing firms.
- 4.6 Labour Supply Forecast: This method looks at the forecast residential growth in the District and the resulting implications of providing jobs for the changing population. This approach is subject to several assumptions in relation to participation in the workforce, commuting patterns and employment types. Furthermore, as seen in Chapter 2.0, population growth is anticipated to be driven by the 65+ year cohort, with a decline in the traditional working age population (16-64 years). Therefore, demand for jobs from the residential population is likely to be low, with resultant low floorspace and land requirements.
- 4.7 The Growth Sites Delivery Strategy raises concerns with reliance on this approach. Fundamentally the scenario utilises the growth of working residents of North Norfolk rather than the growth in the number of workers working in North Norfolk. As reported in section 2 only 63.3% of employed residents of North Norfolk also work within the District. There is a significant outflow. The EEFM forecast that the resident employment (the number of North Norfolk residents in employment, no matter where they work) will increase from 38,200 workers in 2016 to 51,600 workers in 2036, an increase of 13,400 workers over the plan period. This forecast residential workforce growth is significantly more than the EEFM forecast workforce growth for North Norfolk (+2,630) and would indicate a significant outflow of workers to jobs outside the District. Therefore, a significant proportion of the provision of employment land based on these figures would need to be provided outside of the District.
- 4.8 To provide further insight and a more robust position the EEFM was then further interrogated utilising employment by sector information working in North Norfolk updated with ONS data on recent residential workforce by sector and the study concluded that in this scenario the net employment land need is forecast to be 16.5 ha. Factoring in a buffer equivalent to five years of growth, **the employment land requirement would be 20.6 ha.**

4.9 Even with the re-appraisal the Growth Sites Delivery Strategy concludes that:

*‘as there is a net out-commuting in North Norfolk (i.e. more workers travel outside of the District for employment than travel into the District for employment), the above calculated requirement would be an over-estimate of the land requirement using this methodology, as some of the land should be provided outside of the District. Furthermore, with the residential workforce growth anticipated to be larger than the growth in those working in North Norfolk, the proportion of out-commuting would increase. Therefore, some of the provision of this employment land requirement for this residential employment growth would be provided outside of the District.’*

Source: Growth Sites Delivery Strategy 2021, para 7.25

- 4.10 **Policy On Labour Demand Forecast:** This method utilises as adjusted labour demand forecast to account for job implications arising from policy interventions in the local market that are considered to be not adequately accounted for in the East of England model. For North Norfolk, this is likely to be in relation to the Enterprise Zone at Scottow Business Park and the level of employment over and above trend that is anticipated at North Walsham due to the North Walsham Western Extension proposal of 1,800 dwellings, 7 ha of employment land, community facilities and road network improvements including enhancements to the Industrial estate.
- 4.11 The approach assumes that employment is likely to be primarily in the manufacturing sector, with some further employment in the professional and technical services sector and adds a level of ambition which is looking to grow the manufacturing sector by 5% reversing the projected decline in numbers employed in that sector. The model also assumes a further 5% growth in addition to that already forecast in professional services.
- 4.12 Under this scenario, the net employment land need is anticipated to be 7.3 ha between 2016 and 2036 (compared to -3.7 ha for the policy off labour demand forecast). The study then concludes that based on the growth sectors only and including a five year buffer, **the requirement is forecast to be 10.9 ha.**

## Conclusions: Land take-up forecasts

4.13 The below table summarises the findings of the future land requirements based on the four scenarios above, inclusive of the 5 year supply buffer.

**Table 3: Land take-up forecasts- Summary of Forecast Scenarios**

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

- 4.14 The Growth Sites Delivery Strategy recommends the land take up scenario is the most appropriate one to base the Local Plan approach on. The study concludes that the scenario 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 and are all below the Past Take Up scenario.
- 4.15 This is broadly equivalent to the approach consulted on at Regulation 18 stage (42.53 ha) and which received no substantive objections. The amount of land identified as available and put forward for new allocations was however further reviewed through the employment boundary review detailed below and the quantum of land put forward into the Regulation 19, Proposed Submission Local Plan was updated to reflect these assessments.

## 5 Assessment of the Suitability of Employment Areas and Employment Allocations: Regulation 18 Stage

- 5.1 Background Paper 3 at Regulation 18<sup>10</sup> reviewed each designated Employment Land Area with a focus on three main categories: Strategic Planning Factors, Sustainable Development Factors and Market Attractiveness Factors. The assessment is informed by the North Norfolk Housing and Economic Land Availability Assessment (HELAA) Part 2 – Assessment of Employment Land (2018) the Business Growth and Investment Opportunities Study (2015), and by the following criteria:

### Strategic Planning Factors

- Is the site within an area identified as a Large Growth Town or a Small Growth Town within the emerging Local Plan?
- Is the site identified or likely to be required for a specific user or specialist use?
- Is the site part of a comprehensive or long term development or regeneration proposal, which depends on the site being developed for employment uses?
- Is the site the only available or part of a limited supply of land in the locality?
- Are there any other policy considerations, such as emerging strategic objectives or spatial vision which should override any decision to release the site?

### Sustainable Development Factors

- Would the site be allocated in the current policy climate for economic development, measured against present sustainability criteria?
- Is employment the only acceptable form of built development on the site?

### Market Attractiveness Factors

- Has the site been formally identified for employment for at least 10 years?
- Has there been any recent development activity in the last 5 years?
- Is the site being actively marketed as an employment site?
- Is the site owned by a developer or another agency known to undertake employment development?
- Is the site in multiple ownership / occupation, or owned by an organisation unlikely to bring it forward for development?
- Is there public funding committed (or likely to be provided) sufficient to overcome infrastructure or on-site constraints to make employment development viable?
- Is there a valid permission for employment development, likely to meet market requirements? Or for an alternative use?
- Would employment development on this site be viable, without public funding to resolve infrastructure or other on-site constraints?
- Has the authority been approached concerning possible development of the site in the last 5 years?

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<sup>10</sup> [Home | Document Library \(north-norfolk.gov.uk\)](#) First Draft Local Plan Part 1 , background papers

5.2 Each site was then given an assessment ‘score’ in line with each of these factors: High Importance, Medium Importance or Low Importance. The assessment criteria and the categorisation of how these are scored is summarised below:

Table 4: Summary of Factors Considered

Factors Considered (Summary)	Degree of Importance		
	High Importance	Medium Importance	Low Importance
<b>Strategic Planning Factors</b> <ul style="list-style-type: none"> <li>• Location</li> <li>• Size</li> <li>• Adequacy of supply</li> <li>• Designated for specific use</li> </ul>	<ul style="list-style-type: none"> <li>• The site is a large site within or adjacent to a Large Growth Town</li> <li>• There is limited supply of land</li> <li>• The site is designated for a specific use</li> </ul>	<ul style="list-style-type: none"> <li>• Within or adjacent to a Small Growth Town or situated upon the strategic highway network</li> <li>• Choice of possible sites available</li> </ul>	<ul style="list-style-type: none"> <li>• Not in a Large or Small Growth Town</li> <li>• Would make no meaningful contribution to employment land supply</li> </ul>
<b>Sustainable Development Factors</b> <ul style="list-style-type: none"> <li>• Would the site be allocated today applying sustainability criteria?</li> <li>• Site unsuitable for other uses</li> </ul>	<ul style="list-style-type: none"> <li>• The site would be allocated for employment purposes today having regard to sustainability criteria</li> <li>• Unsuitable for another use</li> </ul>	<ul style="list-style-type: none"> <li>• Unlikely to be allocated today unless part of a limited supply</li> <li>• Unsuitable for another use</li> </ul>	<ul style="list-style-type: none"> <li>• Would not be allocated today having regard to sustainability criteria</li> <li>• Is suitable for another use</li> </ul>
<b>Market Attractiveness Factors</b> <ul style="list-style-type: none"> <li>• Vacancy</li> <li>• Availability</li> <li>• Developer Interest</li> </ul>	<ul style="list-style-type: none"> <li>• The site is fully occupied or is being marketed with Planning Permission and/or there have been expressions of developer interest</li> </ul>	<ul style="list-style-type: none"> <li>• The site is allocated for employment and has been vacant for five years or more</li> <li>• There is no evidence of marketing or development interest</li> </ul>	<ul style="list-style-type: none"> <li>• The site has been vacant for the past 5 years and despite evidence of regular and reasonable marketing there has been no developer interest</li> </ul>

### Summary of Assessment at Regulation 18 stage

5.3 The assessment indicated there is very little available land within the Central Area compared to the Eastern and Western Areas of the District. There is a little employment land available in the towns, with the exception of Fakenham, North Walsham and Holt. It is noted that there is a large amount of land available on the former RAF bases, but these should not be seen as a replacement for employment land within the District’s towns due to their more rural locations. There is further available land on both the Enterprise Zones of Egmore and Scottow. The assessment at Regulation 18 stage of designated employment sites is repeated in Appendix 3. In

total it was estimated that **42.53 ha of land was available to be developed for employment uses** across these sites.

Table 5: Summary of assessment of designations and allocations in the LDF showing the total available land (May 2019)

Location		Designated Employment Areas and Enterprise Zones (* to be confirmed) (ha)	Land remaining (undeveloped land on designated Employment Areas and Enterprise Zones) (ha)	Proposed Re-allocations (ha)	Total available land (ha)
<b>Eastern Area</b>		<b>84.78</b>	<b>20.54</b>	<b>5.00</b>	<b>25.54</b>
Catfield		12.01	0.47		0.47
Hoveton		9.88	2.00		2.00
Ludham		0.27	0.00		0.00
Mundesley		0.30	0.00		0.00
North Walsham		47.37	6.07	5.00	11.07
Scottow Enterprise Park		20.00	12.00		12.00
Stalham		1.49	0.00		0.00
<b>Central Area</b>		<b>47.03</b>	<b>7.55</b>	<b>0.00</b>	<b>7.55</b>
Corpusty (Saxthorpe)		1.16	0.00		0.00
Cromer	Function as a Cluster	18.95	0.67		0.67
Holt		13.99	6.88		6.88
Sheringham		3.95	0.00		0.00
Melton Constable		7.68	0.00		0.00
Roughton		1.30	0.00		0.00
<b>Western Area</b>		<b>82.69</b>	<b>14.44</b>	<b>28.50</b>	<b>42.94</b>
Blakeney		0.10	0.00		0.00
Fakenham		58.05	9.44		9.44
Wells		3.04	0.00		0.00
Walsingham Egmere Enterprise Zone		21.50	5.00		5.00
Tattersett Business Park				28.50	28.50
<b>Totals</b>		<b>233.04</b>	<b>42.53</b>	<b>33.50</b>	<b>76.03</b>

Source Background paper no 3, Regulation 18 stage, 2019

- 5.4 Based on the findings of the background paper, the Council considered it is important to retain designations of employment land that were previously designated through the Core Strategy. Furthermore, in order to ensure flexibility within the market over the plan period (2016-2036), the Council proposed to allocate a total of at least 17 ha of additional employment land and the re-allocation of a further 33.5 ha in the following locations, making the total available land designated for employment growth in the emerging Local Plan 50.5 ha and the total amount available in the District approx. 76 ha.

Table 6: Summary of allocation proposed at Regulation 18 stage Local plan production

Location		Proposed Re-allocations (ha)	Proposed allocations
<b>Eastern Area</b>		<b>5.00</b>	<b>11.00</b>
Catfield			
Hoveton			
Ludham			
Mundesley			
North Walsham		5.00	9.00
Scottow Enterprise Park			
Stalham			2.00
<b>Central Area</b>		<b>0.00</b>	<b>6.00</b>
Corpusty (Saxthorpe)			
Cromer	Function as a Cluster		
Holt			6.00
Sheringham			
Melton Constable			
Roughton			
<b>Western Area</b>		<b>28.50</b>	
Blakeney			
Fakenham			
Wells			
Egmere Enterprise Zone			
Tattersett Business Park		28.50	
<b>Totals</b>		<b>33.50</b>	<b>17.00</b>
		<b>50.50</b>	

Source Para 6.2 Background Paper 3 Regulation 18, May 2019

- 5.5 This approach was consulted on at Regulation 18 where a mixture of responses was received which generally focused around support for specific sectors e.g. green energy sector and the perceived lack of need for employment land given the changing economic landscape. Statutory Bodies & Organisations were largely supportive of the policy approach with one general comment that quantum proposed should be a minimum to allow for flexible future growth across the District.
- 5.6 The subsequent 2021 Growth Sites Delivery Strategy provided a further assessment and refinement of the supply and demand for employment sites. Looking at the available employment allocations and existing employment areas in order to understand the supply side, the strategy reviewed the property market, consulted with local stakeholders and critiqued the market to understand the demand side further. This included employment land, employment allocations, enterprise zones, proposals for other areas and mixed use areas that have an employment component. The assessment detailed in chapter 6 (para 6.5 / Table 14) of the



strategy estimated that there was 61.32 ha of land available for employment use through the proposed allocations and existing capacity on employment sites. **45.91 ha of which was available on the existing employment site** - approximately 3.38 ha more than previously identified at Regulation 18 stage.

- 5.7 In order to ensure a robust approach, the boundaries of the employment sites were then subjected to review through a desk top study conducted with local knowledge in relation to planning permissions and local constraints as outlined in section 6 below. The boundary review, in turn, refined and updated the quantum of available employment land identified in the 2021 Growth Sites Delivery Strategy as set out below and **set the base line position of available land supply on existing employment land for the proposed submission version of the Local Plan at 54.06 ha.**
- 5.8 It is considered that the suitability assessments of sites set out above, coupled with the detailed analysis and assessments through the Growth Sites Delivery Strategy 2021 and the subsequent boundary review within this paper, provide the robust justification for the local plan employment designations and the base line position of the available employment land in the proposed submission version of the Local Plan.

## 6 Assessment of Employment Area Boundaries

- 6.1 In order to ensure that the boundaries of the Employment Areas accurately reflect existing employment uses and remain robustly defined, an assessment of each proposed designated employment area boundary was undertaken during the summer of 2021.
- 6.2 Employment Area boundaries were amended in the following situations:
- Where a Non-employment use or use that had limited/no employment generation had been granted planning permission and had been implemented on an employment area; (reduction);
  - An employment use has been granted planning permission and been implemented adjacent to an employment area; (extension)
  - Environmental factors (i.e. flood risk) prevent the site being used for an employment use; (reduction);
  - Minor alteration in order to align, to property and feature boundaries defined by an up to date Ordnance Survey base map (Mastermap), and/or to correct historical plotting inaccuracies (recorded on policies map only) and are not referenced below.
- 6.1 Where a change is proposed this is noted in the change ref column in the following table, with relevant context, justification for the change and details of any action also provided. The table is colour coded, with green signifying a positive change to area, red signifying a reduction to area and no colour signifying no boundary change. Maps detailing all Local Plan **Employment Area** designations, and where changes have occurred, **Employment Allocations** and **Enterprise Zones** are detailed in **Appendix 2**
- 6.2 **The Local Plan Employment Areas (Including Enterprise Zones) that remain undeveloped and available to be developed for employment uses is calculated to be 54.06 ha and is the base line position of available land on existing employment designations at Regulation 19 stage of the Local Plan.**

Table 7: Employment Area Boundary Review, September 2021

Employment Areas

Ref no	Site	Reason for Boundary Change	Change Ref	Action / Justification
EMP01	<b>Catfield</b> Industrial Estate	N/A	N/A	No changes.
EMP02	Cromer Land at Jubilee Lane / Cromer High Station	N/A	N/A	No changes (previous site allocations, DPD 2011, Site Ref C07 (part))
EMP03/1	<b>Cromer</b> Holt Road Industrial Estate (East) EMP03/1	Logical adjustment in relation to PF/08/0063 and PF/15/1567.	07	Minor adjustments to the boundary to align with topography.  Approximate site increase: 0.20 ha
EMP03/2	<b>Cromer</b> Holt Road Industrial Estate (West)	N/A	N/A	No changes.
EMP04	<b>Cromer</b> Cromer Retail Park	N/A	N/A	No changes.
EMP05	<b>Fakenham</b> Fakenham Industrial Estate	Residential permissions PF/02/0311 and PM/04/1833.	02, 03	02 - The designated area has been reduced to omit implemented residential permission PF/02/0311.  03 - The designated area has been reduced to omit residential permission PM/04/1833.  Total site reduction: 0.90 ha
EMP06	<b>Fakenham</b> Fakenham Commerce Park, Enterprise Way	N/A	N/A	No changes.
EMP07/1	<b>Fakenham</b> Adjacent 30 Holt Road	N/A	N/A	No changes.
EMP07/2	<b>Fakenham</b>	N/A	N/A	No changes.

Ref no	Site	Reason for Boundary Change	Change Ref	Action / Justification
	66-72 Holt Road			
EMP08	<b>Fakenham</b> Oxborough Lane	Factory extension PF/14/0217	08	The site area has been extended at the southern side to fully incorporate the developed area of Kinnerton's Confectionary. PF/14/0217 permitted a factory extension + manoeuvring area, also being used as a storage compound. The designation is therefore adjusted to incorporate the area developed by implementing this permission.  Total site increase: 0.63 ha
EMP09	<b>Fakenham</b> Hempton Road	N/A	N/A	No changes.
EMP10	<b>Holt</b> Hempstead Road Industrial Estate	N/A	N/A	No changes.
EMP10/1	<b>Holt</b> Hempstead Road Industrial Estate	N/A	N/A	No changes. Previous Site Allocations DPD site Ref H09 (part) Recent permission employment use. PF/20/2047
EMP11/1	<b>Holt</b> Old Station Way (Thaxters)	N/A	N/A	No changes.
EMP11/2	<b>Holt</b> Old Station Way (Tyre Pro)	N/A	N/A	No changes.
EMP12	<b>Hoveton</b> Tunstead Road Industrial Estate	N/A	N/A	The remaining (1.68 ha) has been granted a permission (PO/15/0539) for a

Ref no	Site	Reason for Boundary Change	Change Ref	Action / Justification
	(Tilia Business Park)			residential development, however is not as yet been built out.  Residential area 1.68 ha removed  Boundary realigned on western side to omit land forming the railway line.
EMP13	<b>Hoveton</b> Stalham Road Industrial Estate EMP13	New commercial units PF/16/0733, PM/18/1580	04	The designated area has been increased to incorporate implemented permissions PF/16/0733 and PM/18/1580 for light industrial and storage units.  Total site increase: 0.59 ha
EMP14	<b>Melton Constable</b> Melton Constable Industrial Estate, Marriott Way	Storage and grading of soils BX/14/1358, PF/02/0489	09	The designated area has been increased to incorporate implemented permissions BX/14/1358 and PF/02/0489 for general industrial uses.  Total site increase: 0.40 ha
EMP15	<b>North Walsham</b> North Walsham Industrial Estate	PF/06/1272 HX/07/1397 BX/11/1273 BX/13/0269 BX/14/1397 PF/99/0602	12, 13, 14, 15	12 - The designated area has been extended at the north-eastern corner to fully incorporate the logical boundary of the Industrial Site. The designated area has also been extended to incorporate various permissions for industrial uses, primarily a waste transfer station.

Ref no	Site	Reason for Boundary Change	Change Ref	Action / Justification
				<p>13 – Previous Site Allocations DPD 2011, Ref E10 is incorporated into the designated area for EMP15.</p> <p>14 - The designated area has been extended to incorporate implemented permission PF/99/0602 for a new warehouse building at Weener Plastics factory.</p> <p>15 - Southern tip of this designation has been removed. This provided access to Laundry Loke (formerly employment, now built residential)</p> <p>Total site increase: 6.43 ha</p>
EMP16	<b>North Walsham</b> Midland Road	N/A	N/A	No changes.
EMP17	<b>North Walsham</b> CT Baker Builders Yard, Norwich Road	N/A	N/A	No changes.
EMP18	<b>North Walsham</b> Bradfield Road Industrial Estate West (Formerly Crane Freuhauf / General Trailers)	Note: Forms part of Local Plan mixed-use allocation NW62	10	No changes.  <b>Note:</b> Part of this existing designation (4.1 ha) is also proposed for allocation for comprehensive mixed use proposal NW62 (North Walsham West).
EMP19	<b>North Walsham</b> Bradfield Road Industrial Estate	Note: Forms part of Local Plan mixed-use allocation NW62	11	No changes.  <b>Note:</b> Part of this existing designation

Ref no	Site	Reason for Boundary Change	Change Ref	Action / Justification
	East (Travis Perkins)			(0.94 ha) is also proposed for allocation for comprehensive mixed use proposal NW62 (North Walsham West).
EMP20	<b>Sheringham</b> Weybourne Road Industrial Estate EMP20	Residential permission PO/14/0136	05	The designated area has been amended to omit implemented residential permission PO/14/0136 and subsequent piecemeal applications on the outline site area at Jamie Wright Close.  Total site reduction: 0.78 ha
EMP21	<b>Stalham</b> Nicholsons Yard, Yarmouth Road EMP21	To exclude existing residential properties	06	The designated area has been decreased in order to exclude existing residential properties; The Forge and Yew Tree Cottage, Yarmouth Road.  Total site reduction: 0.09 ha
EMP23	<b>Wells-next-the-Sea</b> Great Eastern Way / Polka Road EMP23	N/A	N/A	No changes.
EMP24	<b>Fakenham</b> Commerce Park Extension/ Land of Rudham Stile Lane. F01	Incorporate permissions already developed through F01.		Extended to include 2.24 ha from F01 allocation (See below).  Previous Site Allocations DPD 2011, site Ref F01 – Site since has planning permission. (EMP24 forms part of F01, which was Allocated 7 ha of employment land. The residual taken up by the health centre and

Ref no	Site	Reason for Boundary Change	Change Ref	Action / Justification
				care home 2.24 ha. Therefore, collectively between EMP24 and F01 residual equates to 8.68 ha.)
EMP25	<b>Holt</b> Land at Heath Farm, Nightjar Road.	N/A	N/A	Land designation in Site Allocations DPD 2011 through allocation Policy H09 (part)
EMP26	<b>North Walsham</b> Hornbeam Business Park	Mixed Use Allocation from Core Strategy		Site developed with adjacent residential site allocated through previous Site allocation DPD, 2011. Site Ref NW01 (part)
EMP27	<b>North Walsham</b> Ewing Road	No specific boundary		This is a new employment land designation, based on the approved masterplan for PF/15/1010 which prescribes the area set aside for employment uses. The area designated partly reflects the quantum of employment land allocated through mixed-use allocation NW01 in the Site Allocations DPD (2011).
EMP28	<b>Blakeney</b> Land off North Road	Residential permission PF/10/0752	01	The employment area has been reduced to omit implemented residential permission PF/10/0752 on the northern part of the site. In addition the boundary is amended to omit the access road which now serves residential properties.  Total site reduction: 0.08 ha



Ref no	Site	Reason for Boundary Change	Change Ref	Action / Justification
EMP29	<b>Corpusty</b> Land North of B1149	N/A	N/A	No changes.
EMP30	<b>Ludham</b> Garage Site, High Street	N/A	N/A	No changes.
EMP31	<b>Mundesley</b> Land South of Cromer Road	Logical adjustment, reflecting PF/01/0355, PF/11/1163 and others.	17	The designated area has been increased to incorporate the full extent of the employment area with appropriate permissions for employment uses. The southern limit of the boundary was previously abruptly cut off adjacent to the designated Countryside Area.  Total site increase: 0.13 ha
EMP32	<b>Mundesley</b> Garage Site, North of High Street	N/A	N/A	No changes.
EMP33	<b>Roughton</b> Land off Norwich Road EMP33	N/A	N/A	No changes.
NW01 /B	<b>North Walsham</b> Norwich Road/ Nursery Drive (South)	No specific boundary	N/A	Mixed use Allocation NW01/B - Retention and enhancement of 2.0 ha. of existing Employment land of which 3.46 ha (Retained). Part of NW01 Mixed use allocation Core Strategy, carried over into Local Plan NW01/B

## Enterprise Parks

Site	Reason for Boundary Change	Change Ref	Action / Justification
Scottow	Clarification BE Study 2021, incorrectly identified the site as 32.00ha.  The 7.3 ha is land that is not in the Enterprise Zone and is a wooded area North East of the Enterprise Park. The Enterprise Park is County Council owned and therefore any additional inclusion of land to the Employment area would be its prerogative.		No change –Not NNDC Boundary. 26.40ha.  The total area of the Enterprise Park is 26.40 ha and is fully developed.
Egmere Enterprise Zone	Clarification BE Study 2021, incorrectly identified the site as 32.00ha.		No change –Not NNDC Boundary

## Existing Employment Allocations

Site	Area (ha)	Comments
Tattersett Business Park	28.80	E7

## New Local Plan Employment Allocations

Site	Area (ha)	Proposal Policy
North Walsham Western Extension	7.00	NW62A
North Walsham	2.43	NW52
Stalham	2.00	ST23/2
Holt Land at Heath Farm	6.00	H27/1
<b>Total</b>	<b>17.43</b>	

## 7 Overall Conclusion

- 7.1 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.
- 7.2 The re-designated and newly designated employment sites will provide up to 54.06 ha of available employment land, 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. Such sites remain the most suitable for employment generating uses within Use Classes E(g), B2 and B8. However, 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 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 Local Plan through Policy E1 sets out a land supply to provide for 74.49 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.
- 7.3 Table 8 sets out the current employment land position through new allocations and existing capacity on employment sites and informs the land position as set out in Policy E1 of the Local Plan at Regulation 19, proposed submission stage. The full breakdown is shown in **Appendix 1**.

**Table 8: Total Developed & Undeveloped Employment Land  
New Designated / Allocated Land & Total Employment Land across the  
District.**

Location	Existing Employment Areas (Including Enterprise Zones) - Already developed (ha)	Existing Employment Areas (Including Enterprise Zones) Undeveloped (ha)	New Proposed Allocation (ha)	Total Employment Land (ha)
Catfield	11.69	0.34	0	12.03
Hoveton	7.80	1.02	0	8.82
Ludham	0.27	0	0	0.27
Mundesley	0.43	0	0	0.43
North Walsham	45	13.2	9.43	67.63
Scottow	26.4	0	0	26.40
Stalham	1.40	0	1	2.40
<b>Eastern Area</b>	<b>92.99</b>	<b>14.56</b>	<b>10.43</b>	<b>117.98</b>
Corpusty	1.16	0		1.16
Cromer	17.33	1.92		19.25

Holt	9.51	4.45	6.00	19.96
Sheringham	3.95	0		3.95
Melton Constable	8.08	0		8.08
Roughton	0.13	0		0.13
<b>Central Area</b>	<b>40.16</b>	<b>6.37</b>	<b>6.00</b>	<b>52.53</b>
Blakeney	0.09	0		0.09
Fakenham	50.57	9.49		60.06
Wells-next-the-Sea	3.04	0		3.04
Egmere	0	8.57	0	8.57
Tattersett	13.73	15.07	0	28.80
<b>Western Area</b>	<b>67.43</b>	<b>33.13</b>	<b>0</b>	<b>100.56</b>
<b>Grand Total</b>	<b>200.58</b>	<b>54.06</b>	<b>16.43</b>	<b>271.07</b>

Source Employment Land Supply Reg 19 final 17.11.21.

## Appendix 1

### Breakdown of Total Developed & Undeveloped Employment Land, New Designated / Allocated Land and Total Employment Land Across the District

Location	Local Plan Reference	Existing Employment Areas (Including Enterprise Zones) - Already developed (ha)	Existing Employment Areas (Including Enterprise Zones) Undeveloped (ha)	New Proposed Allocation (ha)	Total Employment Land (ha)
Catfield Industrial Estate	EMP01	11.69	0.34		12.03
<b>Catfield</b>		<b>11.69</b>	<b>0.34</b>	<b>0</b>	<b>12.03</b>
Hoveton Tunstead Road	EMP12	4.62	0.76		5.38
Hoveton Stalham Road Industrial Estate	EMP13	3.18	0.26		3.44
<b>Hoveton</b>		<b>7.80</b>	<b>1.02</b>	<b>0</b>	<b>8.82</b>
Ludham High Street	EMP30	0.27	0		0.27
<b>Ludham</b>		<b>0.27</b>	<b>0</b>	<b>0</b>	<b>0.27</b>
Mundesley Land North of High Street	EMP32	0.16	0		0.16
Mundesley Land South of Cromer Road	EMP31	0.27	0		0.27
<b>Mundesley</b>		<b>0.43</b>	<b>0</b>	<b>0</b>	<b>0.43</b>
North Walsham Industrial Estate	EMP15	29.79	7.28		37.07
North Walsham Midland Road	EMP16	2.10	0		2.10
North Walsham CT Baker Building	EMP17	0.56	0		0.56
North Walsham Bradfield Road Industrial Estate West (Formerly Crane Freuhauf / General Trailers)	EMP18	8.21	2.67		10.88
North Walsham Travis Perkins Site	EMP19	0.63	1.08		1.71

Location	Local Plan Reference	Existing Employment Areas (Including Enterprise Zones) - Already developed (ha)	Existing Employment Areas (Including Enterprise Zones) Undeveloped (ha)	New Proposed Allocation (ha)	Total Employment Land (ha)
North Walsham Hornbeam Business Park	EMP26	0.63	0.91		1.54
North Walsham Norwich Road/ Ewing Road	EMP27	0	0.88		0.88
North Walsham Norwich Road/ Nursery Drive (South)	NW01/B	3.08	0.38		3.46
North Walsham Industrial Site Extension Land East of Bradfield Road	NW52	0	0	2.43	2.43
North Walsham Western Extension	NW62/A			7.00	7.00
<b>North Walsham</b>		<b>45</b>	<b>13.2</b>	<b>9.43</b>	<b>67.63</b>
Scottow Enterprise Park	EMP35	26.40	0		26.40
<b>Scottow</b>		<b>26.4</b>	<b>0</b>	<b>0</b>	<b>26.40</b>
Stalham Nicholson's Yard, Yarmouth Road	EMP21	1.40	0		1.40
Stalham Land North of Yarmouth Road East Broadbeach Gardens.	ST23/2			1.00	1.00
<b>Stalham</b>		<b>1.40</b>	<b>0</b>	<b>1</b>	<b>2.40</b>
<b>Eastern Area</b>		<b>92.99</b>	<b>14.56</b>	<b>10.43</b>	<b>117.98</b>
Corpusty (Saxthorpe) Land north of B1149	EMP29	1.16	0		1.16
<b>Corpusty</b>		<b>1.16</b>	<b>0</b>		<b>1.16</b>
Cromer Holt Road Industrial Estate West	EMP03/2	7.27	1.92		9.19
Cromer Holt Road Industrial Estate East	EMP03/1	6.53	0		6.53
Cromer Retail Park	EMP04	2.9	0		2.90
Cromer Land at Jubilee Lane / Cromer High Station	EMP02	0.63	0		0.63

Location	Local Plan Reference	Existing Employment Areas (Including Enterprise Zones) - Already developed (ha)	Existing Employment Areas (Including Enterprise Zones) Undeveloped (ha)	New Proposed Allocation (ha)	Total Employment Land (ha)
<b>Cromer</b>		<b>17.33</b>	<b>1.92</b>		<b>19.25</b>
Holt Hempstead Road Industrial Estate	EMP10	7.09	0.35		7.44
Holt Land at Heath Farm, Nightjar Road	EMP25	0.6	1.16		1.76
Holt Hempstead Road Industrial Estate. Extension.	EMP10/1	0.96	2.35		3.31
Holt Old Station Way (Thaxters)	EMP11/1	0.56	0.51		1.07
Holt Old Station Way (Tyre Pros)	EMP11/2	0.30	0.08		0.38
Holt Land at Heath Farm	H27/1	0	0	6.00	6.00
<b>Holt</b>		<b>9.51</b>	<b>4.45</b>	<b>6.00</b>	<b>19.96</b>
Sheringham Weybourne Road Industrial Estate	EMP20	3.95	0		3.95
<b>Sheringham</b>		<b>3.95</b>	<b>0</b>		<b>3.95</b>
Melton Constable Industrial Estate	EMP14	8.08	0		8.08
<b>Melton Constable</b>		<b>8.08</b>	<b>0</b>		<b>8.08</b>
Roughton Land off Norwich Road	EMP33	0.13	0		0.13
<b>Roughton</b>		<b>0.13</b>	<b>0</b>		<b>0.13</b>
<b>Central Area</b>		<b>40.16</b>	<b>6.37</b>	<b>6.00</b>	<b>52.53</b>
Blakeney Land off North Road	EMP28	0.09	0		0.09
<b>Blakeney</b>		<b>0.09</b>	<b>0</b>		<b>0.09</b>
Fakenham Industrial Estate	EMP05	27.56	3.05		30.61
Fakenham Commerce Park	EMP06	12.1	0		12.10

Location	Local Plan Reference	Existing Employment Areas (Including Enterprise Zones) - Already developed (ha)	Existing Employment Areas (Including Enterprise Zones) Undeveloped (ha)	New Proposed Allocation (ha)	Total Employment Land (ha)
Fakenham Commerce Park Extension/ Land of Rudham Stile Lane	EMP24	2.24	6.44		8.68
Fakenham Adjacent 30 Holt Road	EMP07/1	1.04	0		1.04
Fakenham 66-72 Holt Road	EMP07/2	1.27	0		1.27
Fakenham Oxborough Lane	EMP08	4.26	0		4.26
Fakenham Hempton Road	EMP09	2.10	0		2.10
<b>Fakenham</b>		<b>50.57</b>	<b>9.49</b>		<b>60.06</b>
Wells Great Eastern Way	EMP23	3.04	0		3.04
<b>Wells-next-the-Sea</b>		<b>3.04</b>	<b>0</b>		<b>3.04</b>
Egmere Enterprise Zone	EMP34	0	8.57		8.57
<b>Egmere</b>		<b>0</b>	<b>8.57</b>	<b>0</b>	<b>8.57</b>
Tattersett Business Park	E7	13.73	15.07		28.80
<b>Tattersett</b>		<b>13.73</b>	<b>15.07</b>	<b>0</b>	<b>28.80</b>
<b>Western Area</b>		<b>67.43</b>	<b>33.13</b>	<b>0</b>	<b>100.56</b>
<b>Grand Total</b>		<b>200.58</b>	<b>54.06</b>	<b>16.43</b>	<b>271.07</b>

Source Employment Land Supply Reg 19 final 17.11.21.

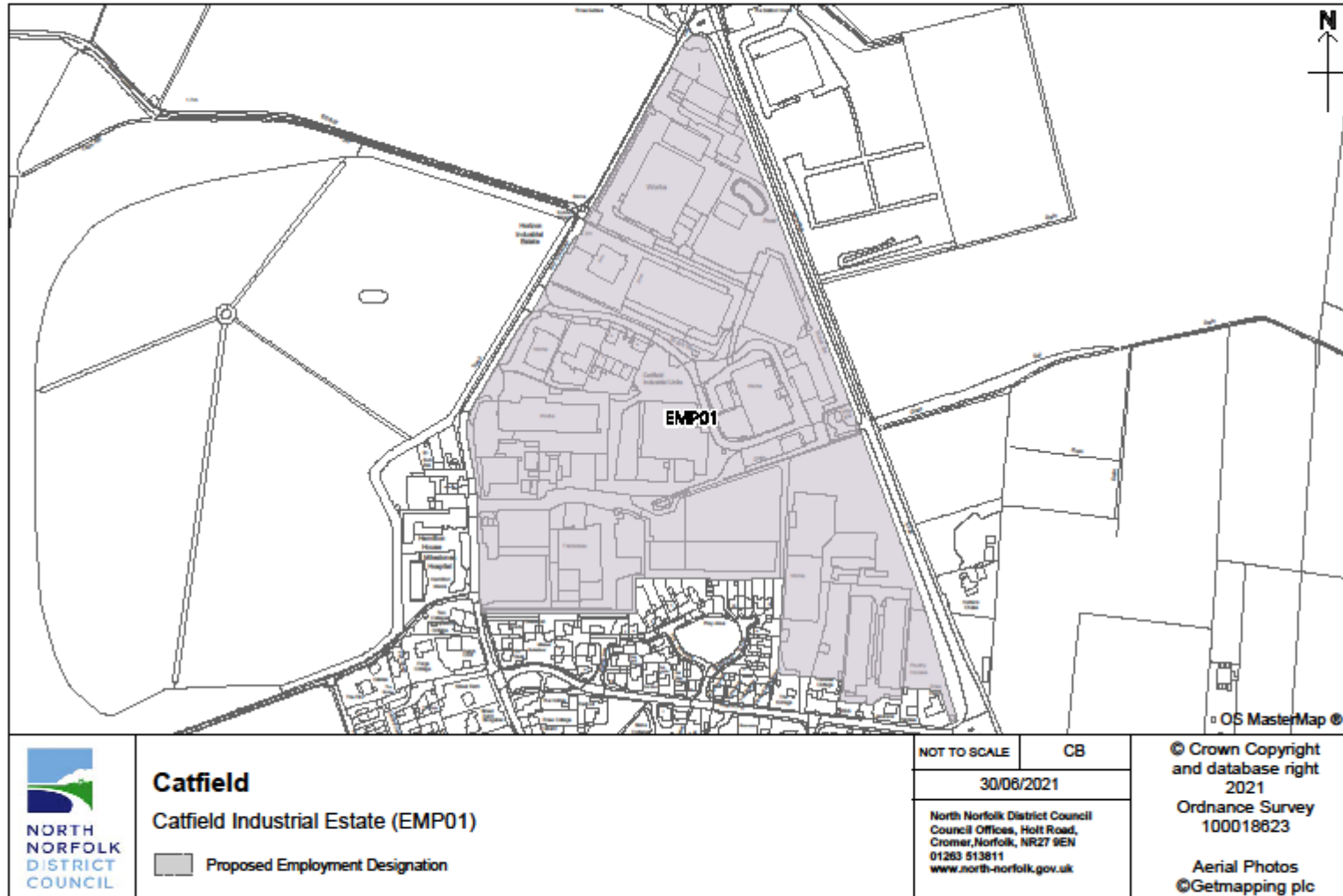
The list above and Table 7 includes a number of former employment/mixed use allocations from the Site Allocations DPD 2011, which are taken proposed to be taken forward as employment allocations into the Local Plan. For clarity these are listed below.

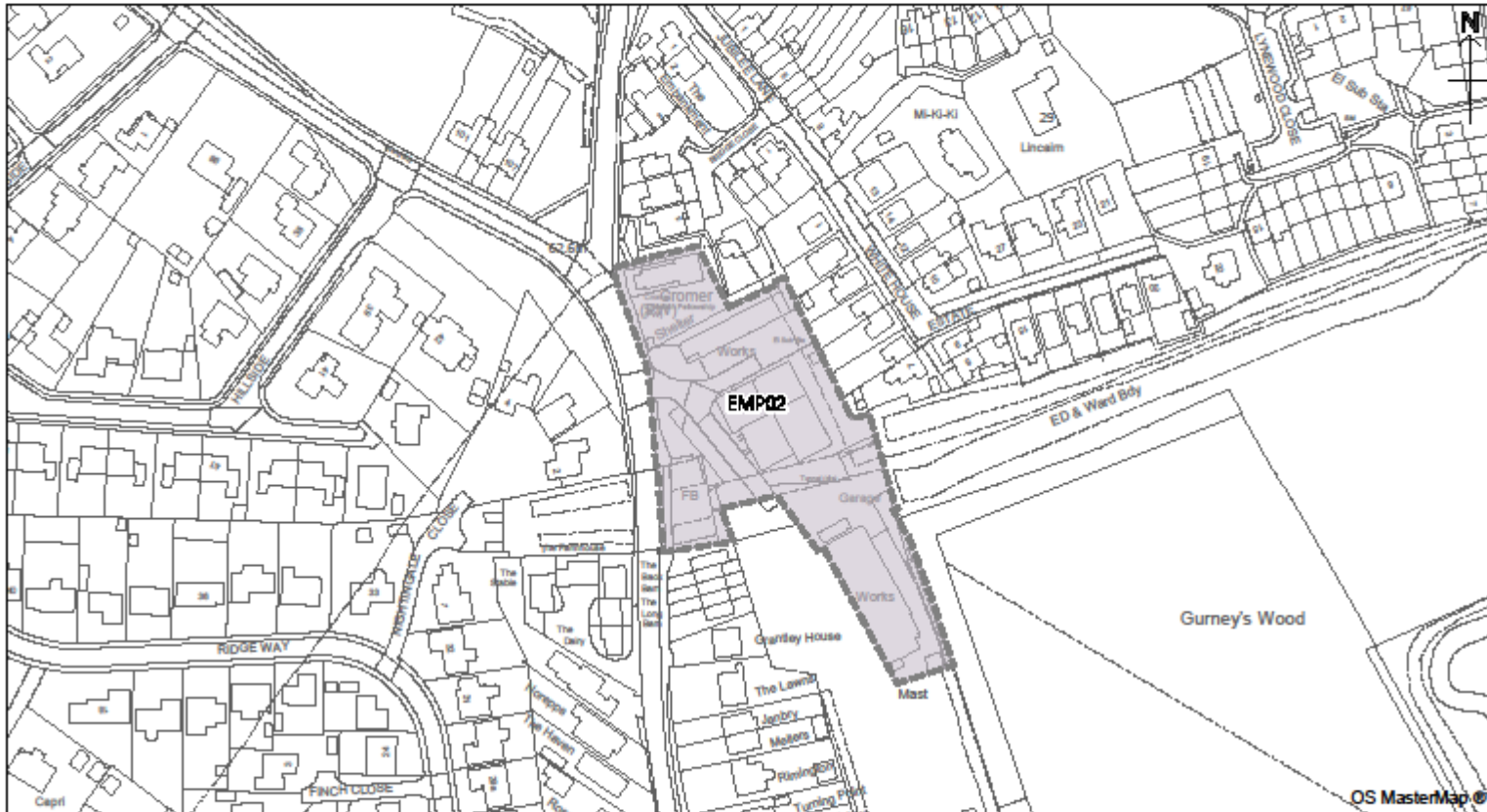
New LP Ref	2011 Site Specific Ref
EMP 2	C07 (part)
EMP 10/1	H09 (part) (Hempstead Road)
EMP 15	E10
EMP 24	F01
EMP 25	H09 (part) (Heath Drive/Nightjar Road)
EMP 26	NW01 (Masterplan PF/13/0866)
EMP 27	NW01 (Masterplan for PF/15/1010)



## Appendix 2

### Employment Sites Boundary Review Mapping





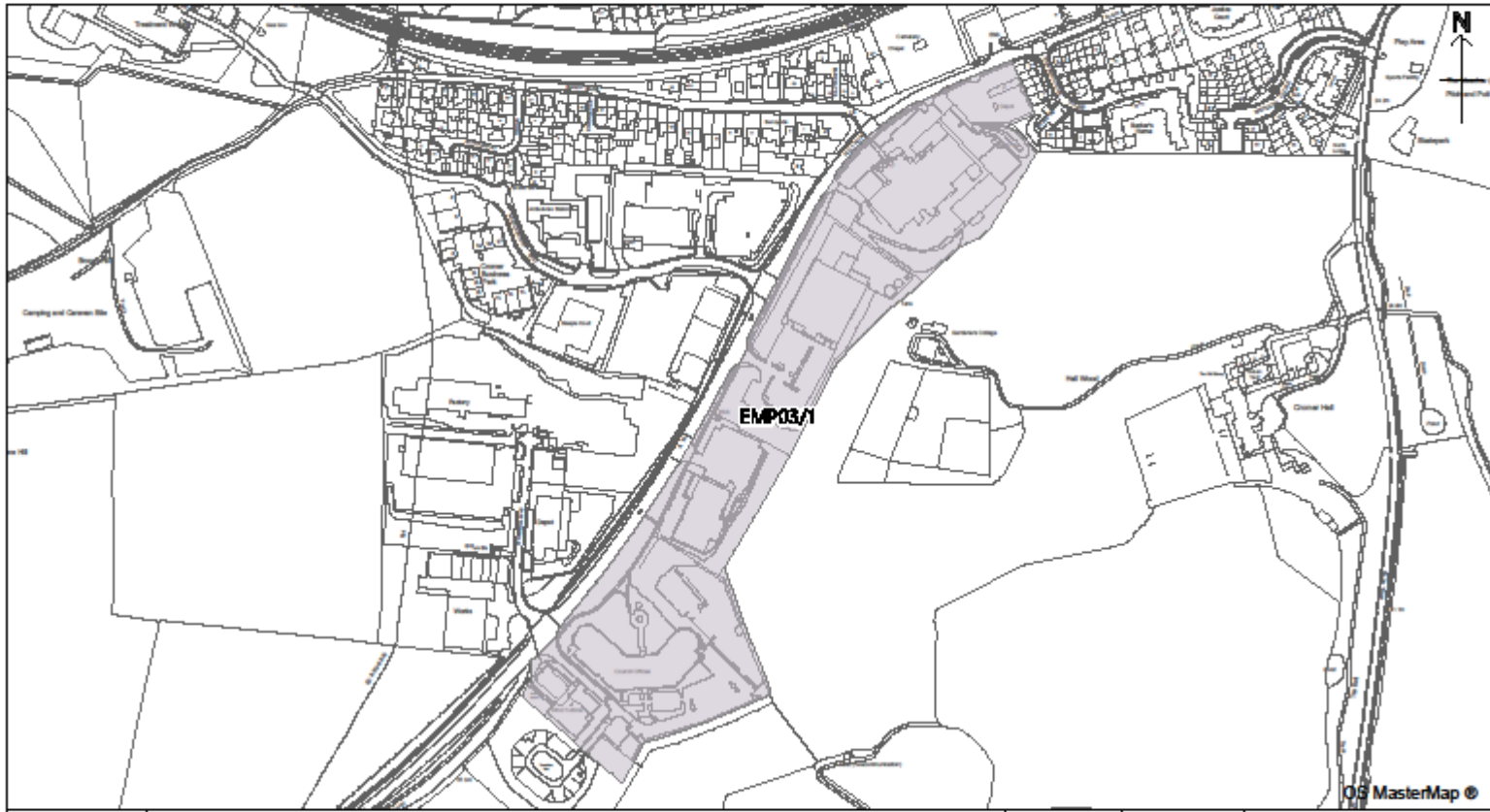
**Cromer**

**New Designation: Land at Jubilee Lane / Norwich Road (EMP02)**

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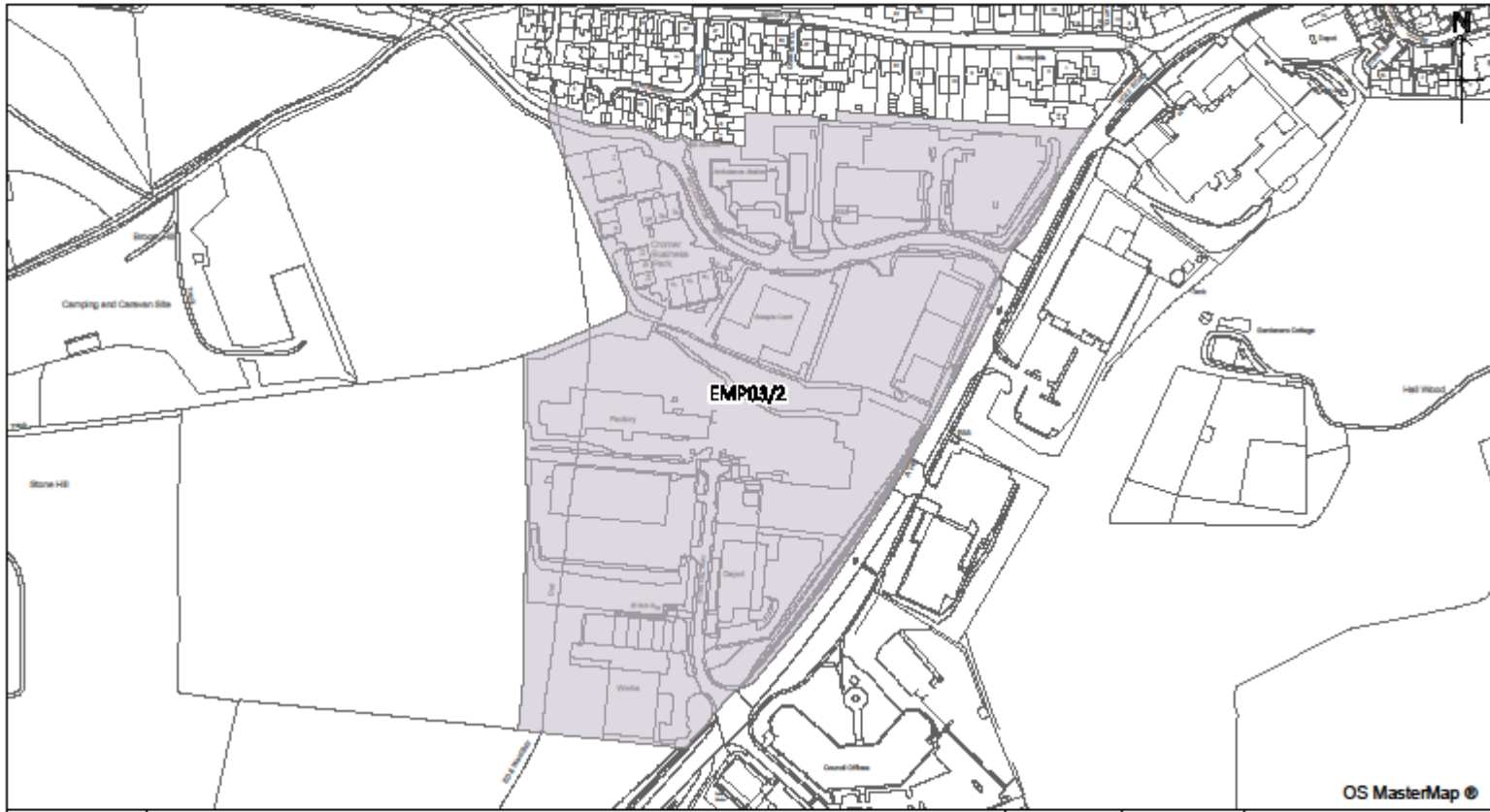
**Cromer**

**Holt Road Industrial Estate East (EMP03/1)**

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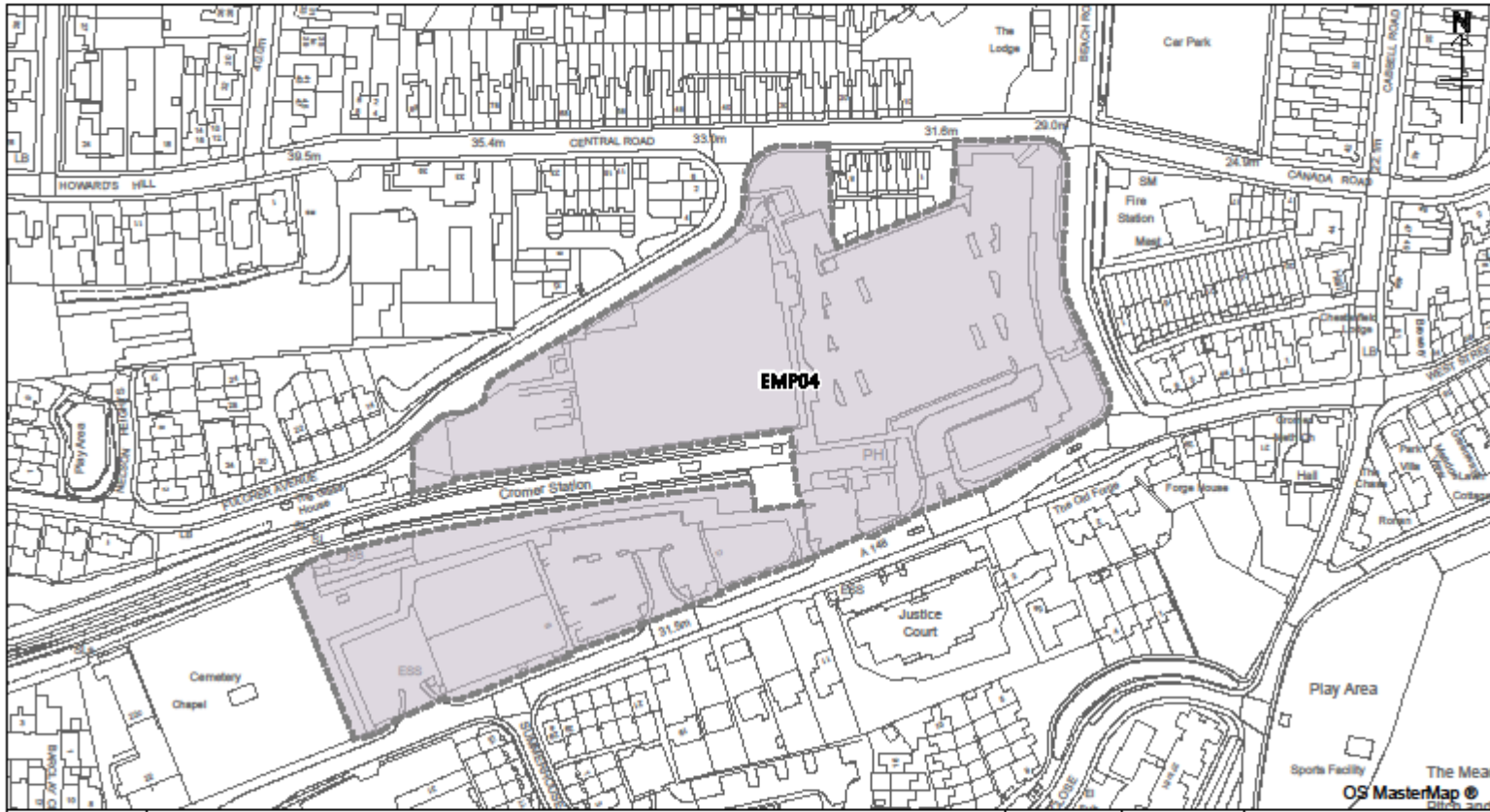
**Cromer**

**Holt Road Industrial Estate West (EMP03/2)**

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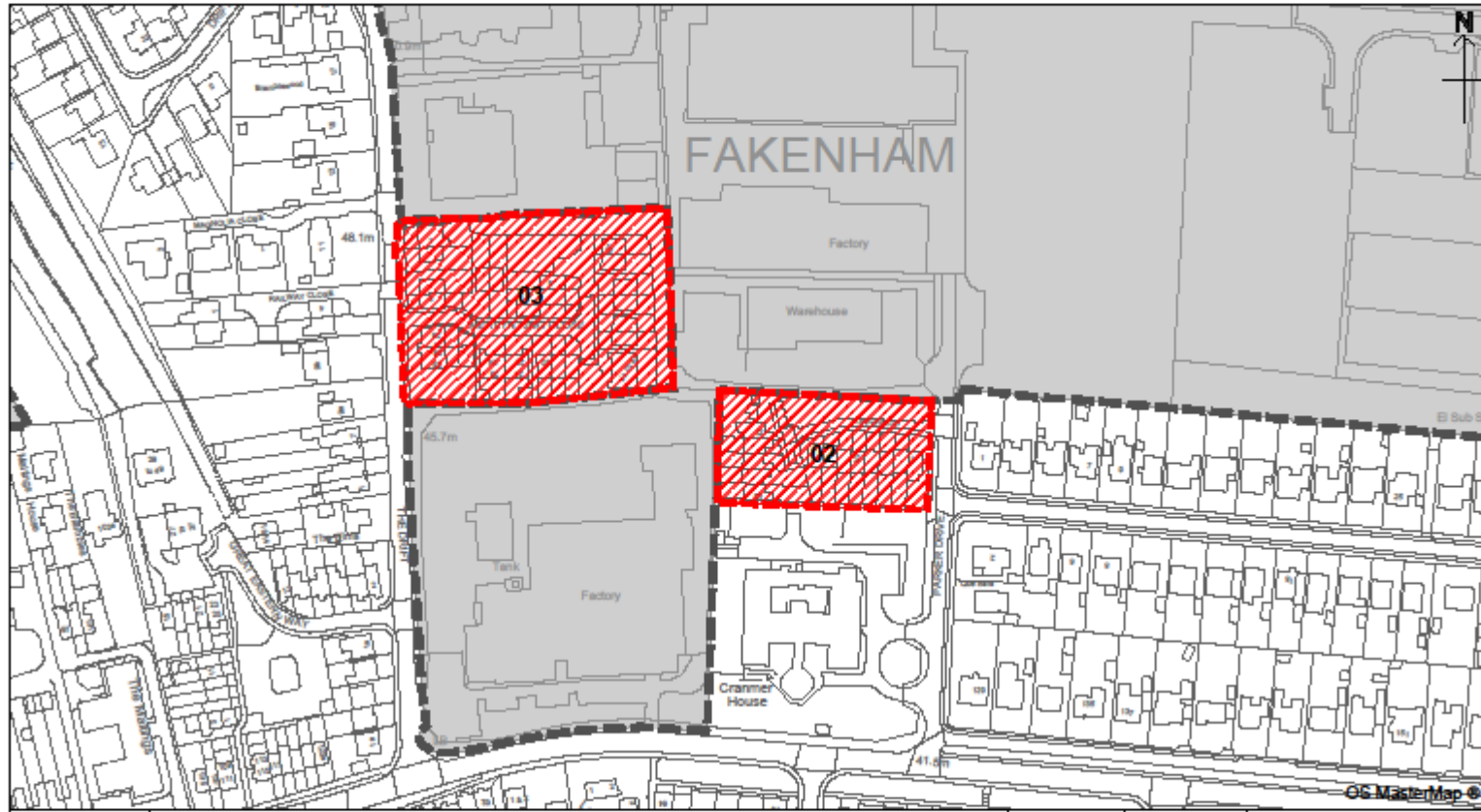
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**Cromer**  
**Cromer Retail Park (EMP04)**  
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**Fakenham**

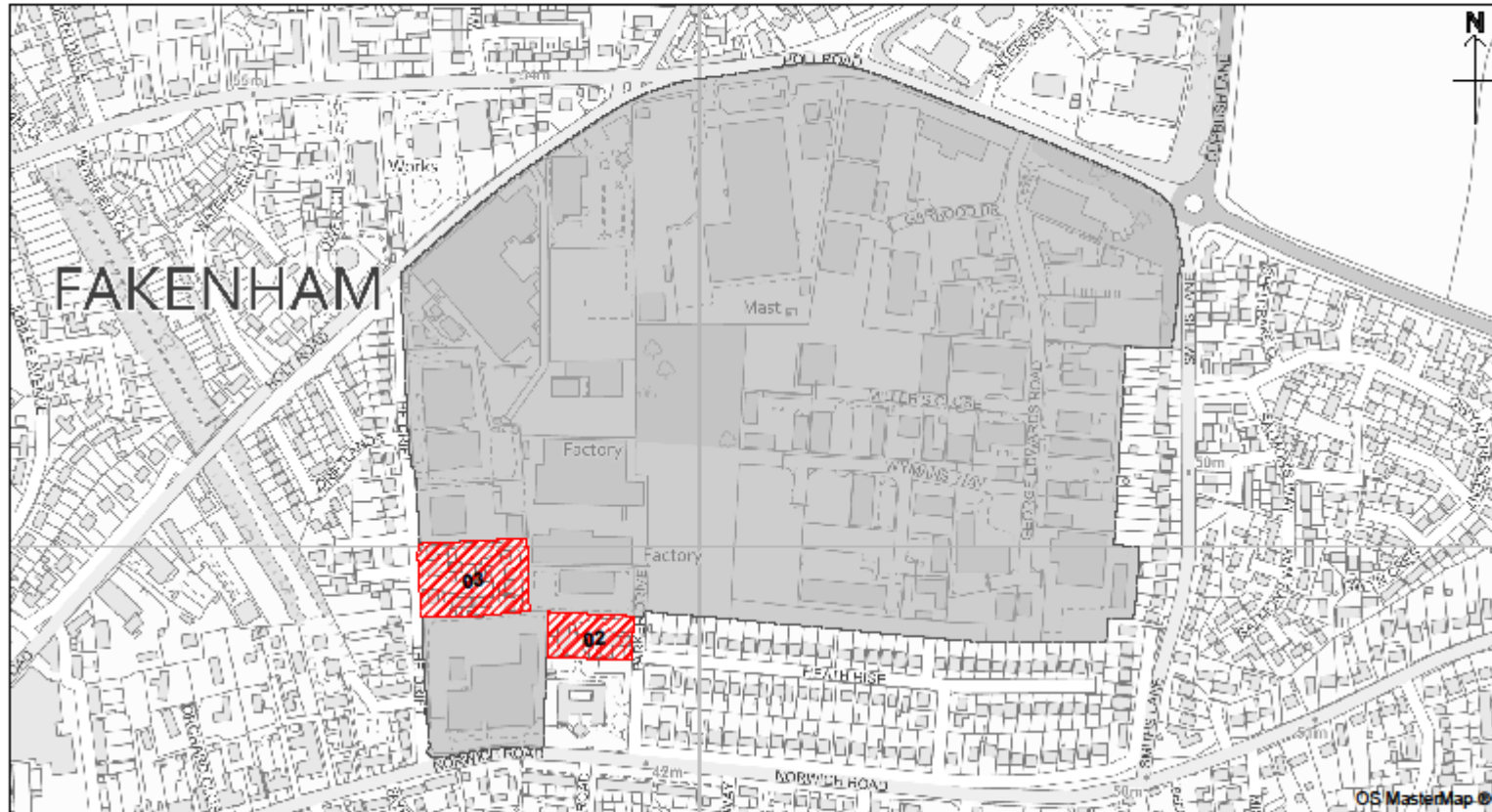
Fakenham Industrial Estate (EMP05)

Employment Designation
  Proposed Addition
  Proposed Deletion

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### Fakenham

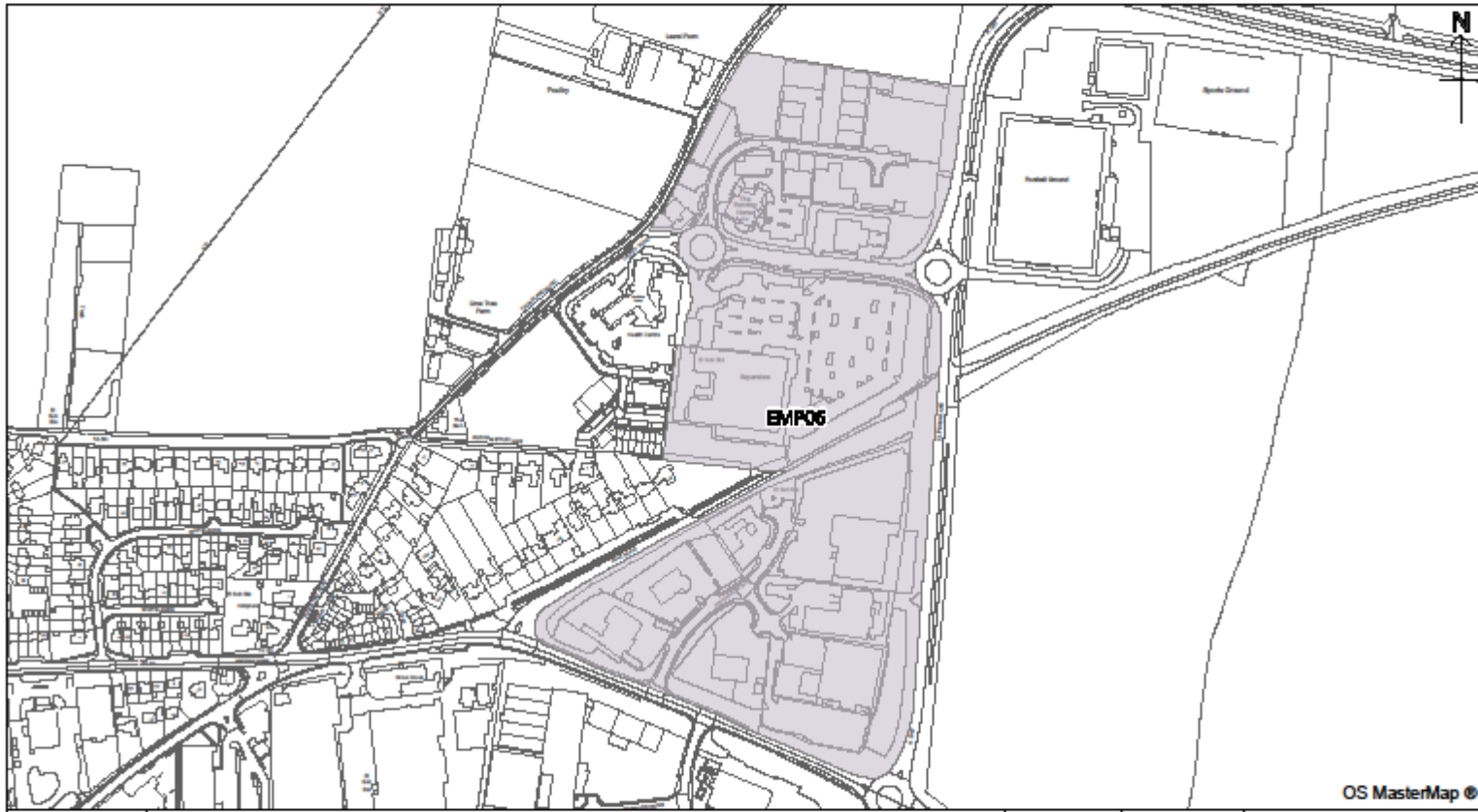
Fakenham Industrial Estate (EMP05)

- Employment Designation
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- Proposed Deletion

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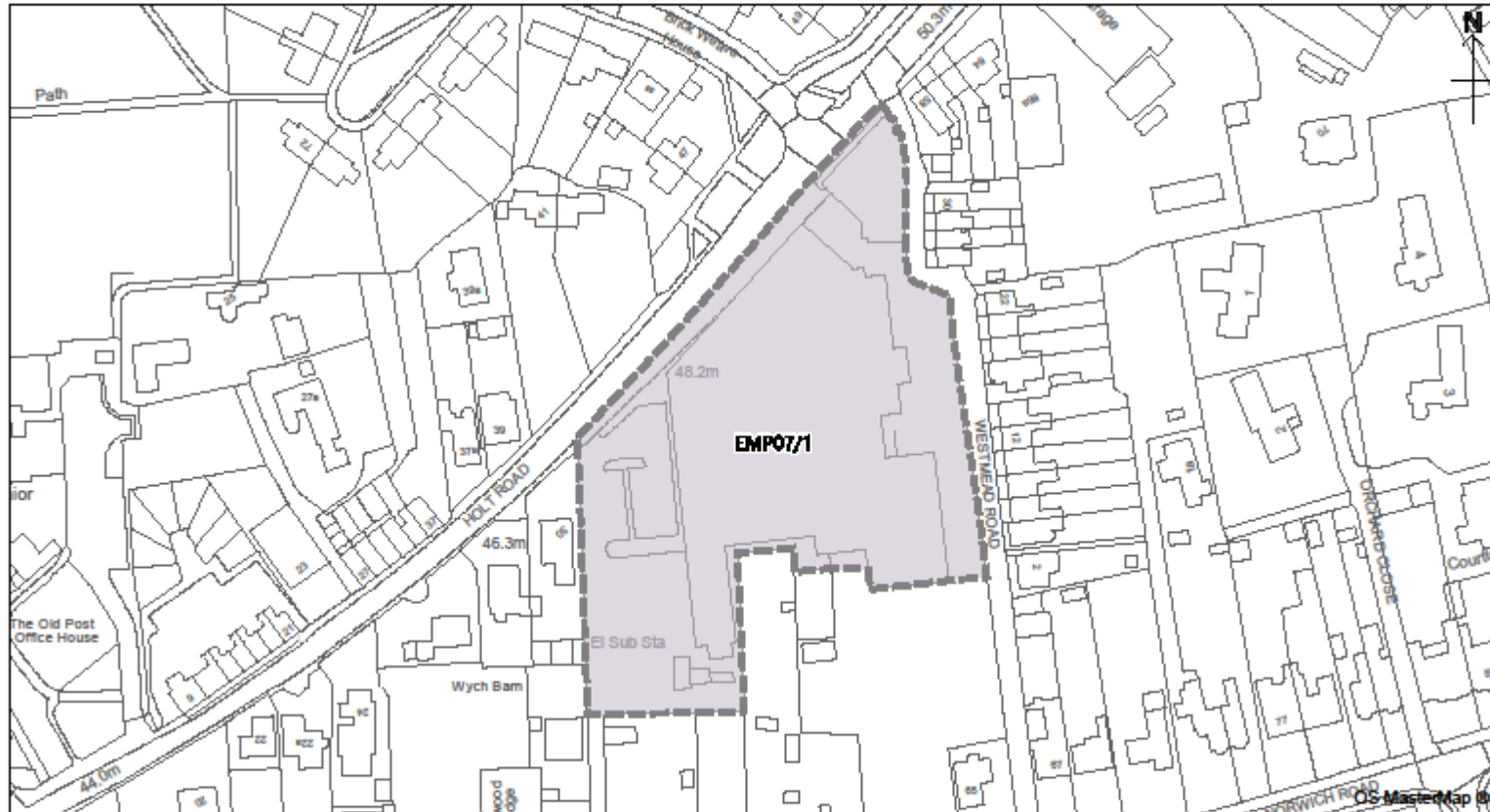
Fakenham Commerce Park (EMP06)

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**Fakenham**

Adjacent 30 Holt Road (EMP07/1)

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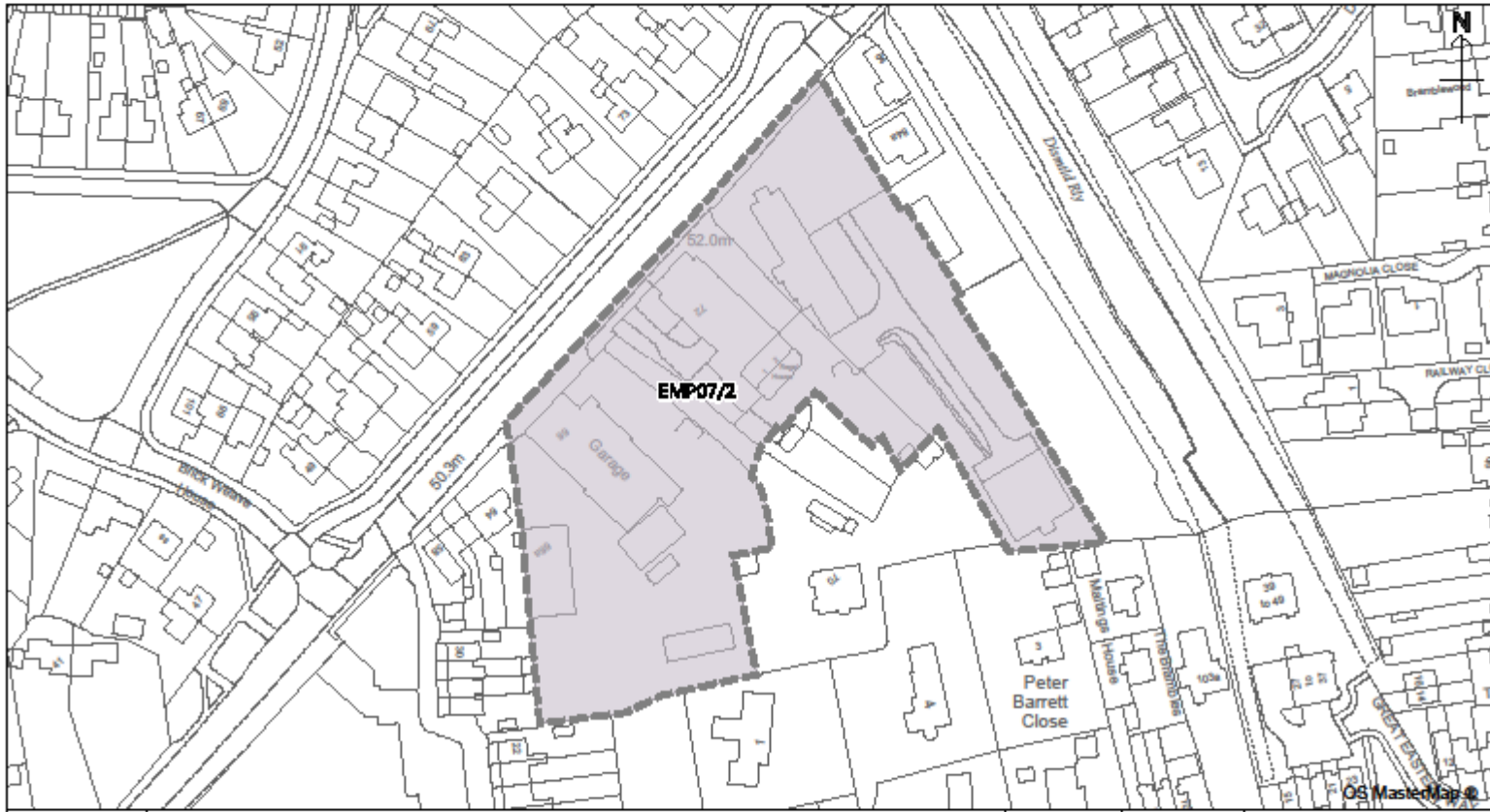
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66-72 Holt Road (EMP07/2)

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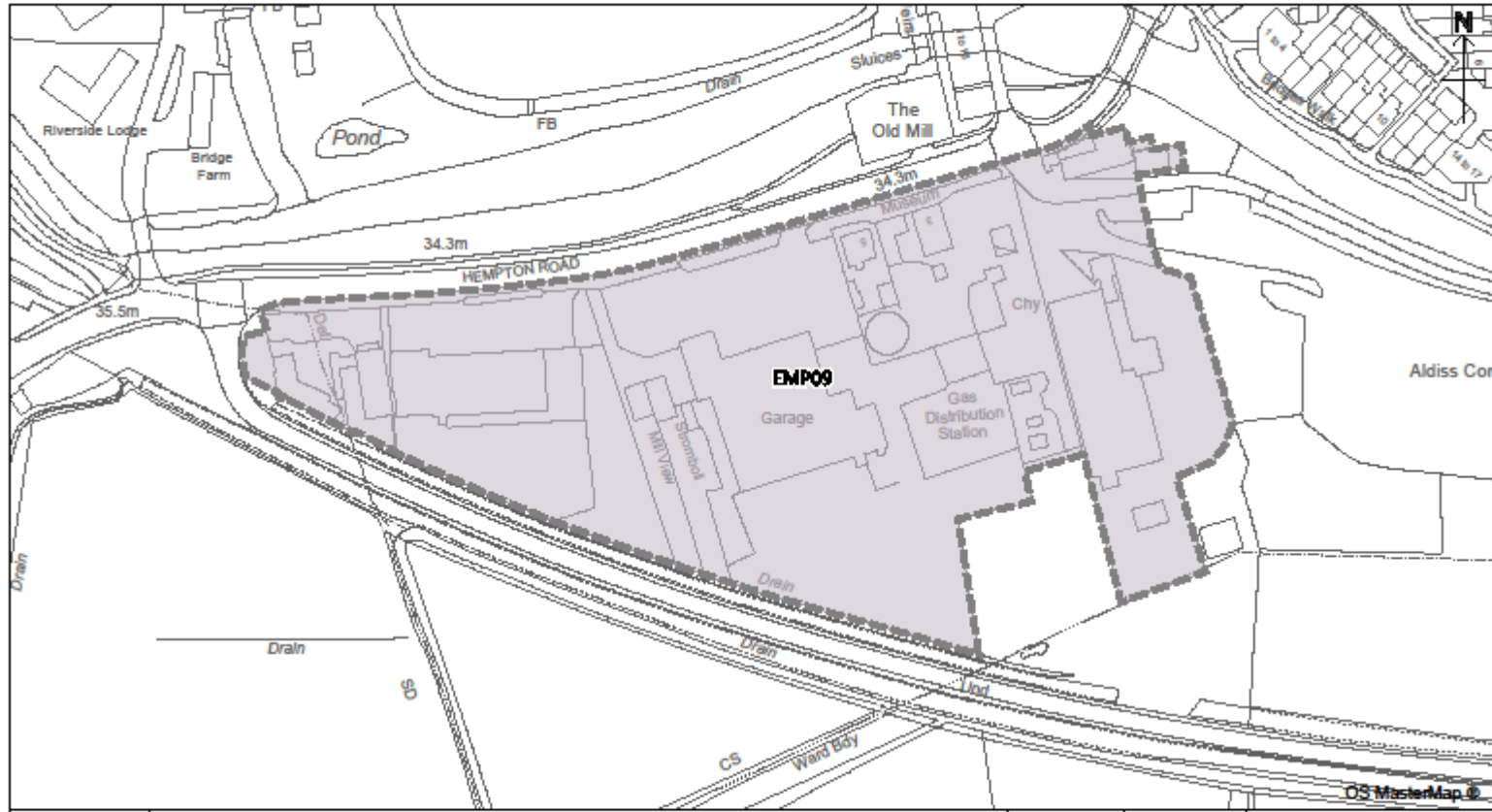
Oxborough Lane (EMP08)

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- Proposed Deletion

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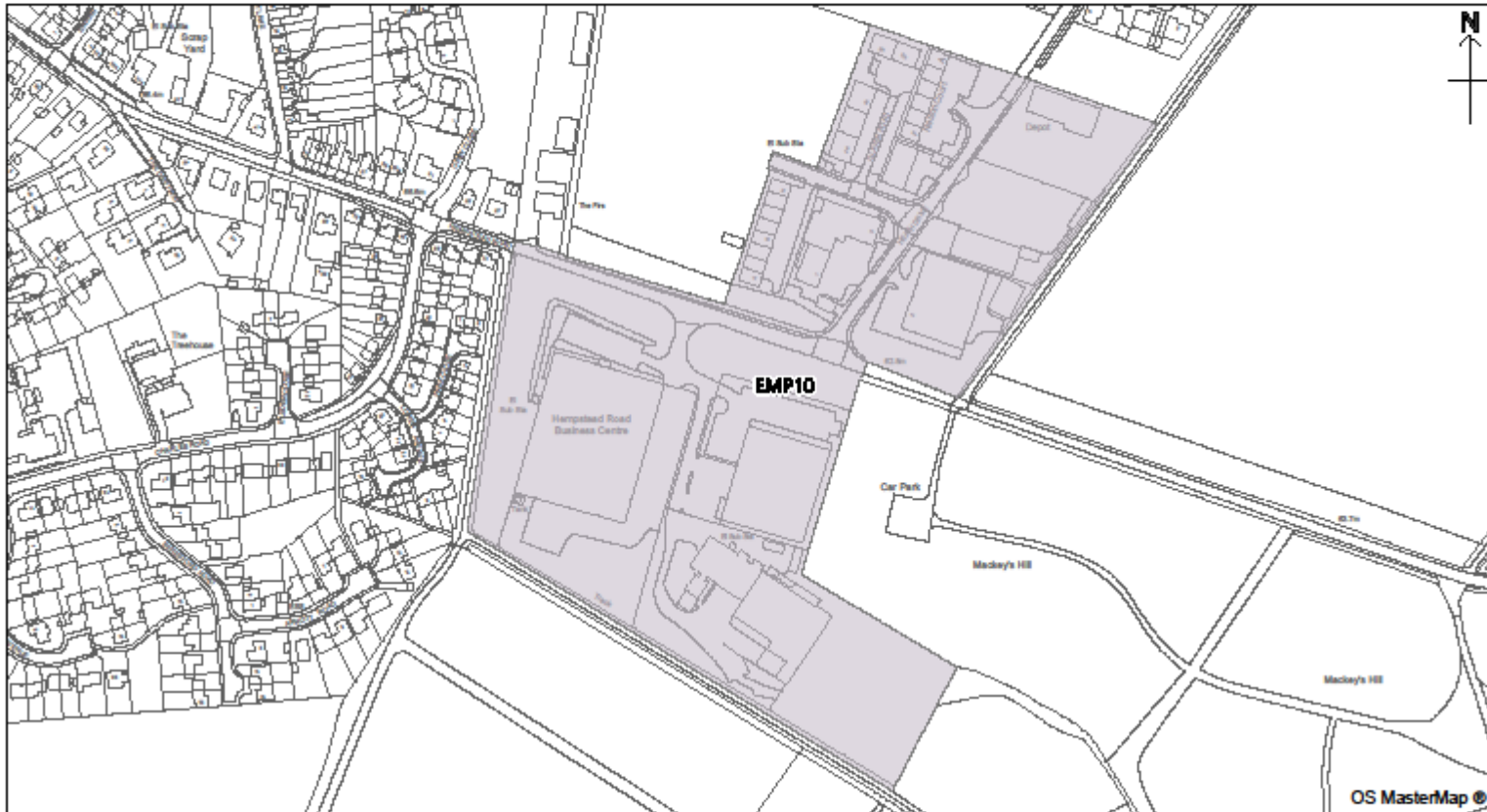
**Fakenham**

Hempton Road (EMP09)

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**Holt**

**Hempstead Road Industrial Estate (EMP10)**

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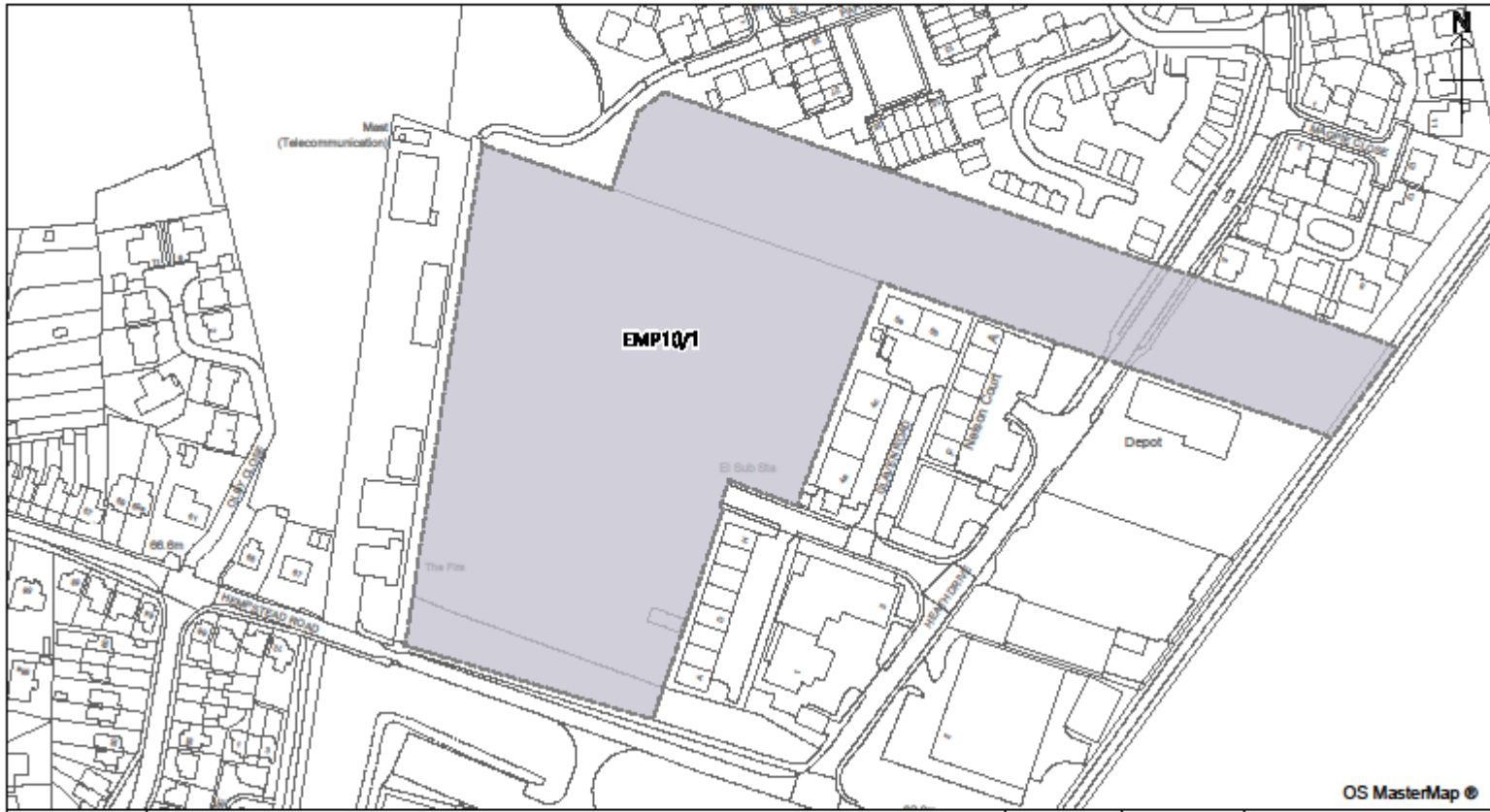
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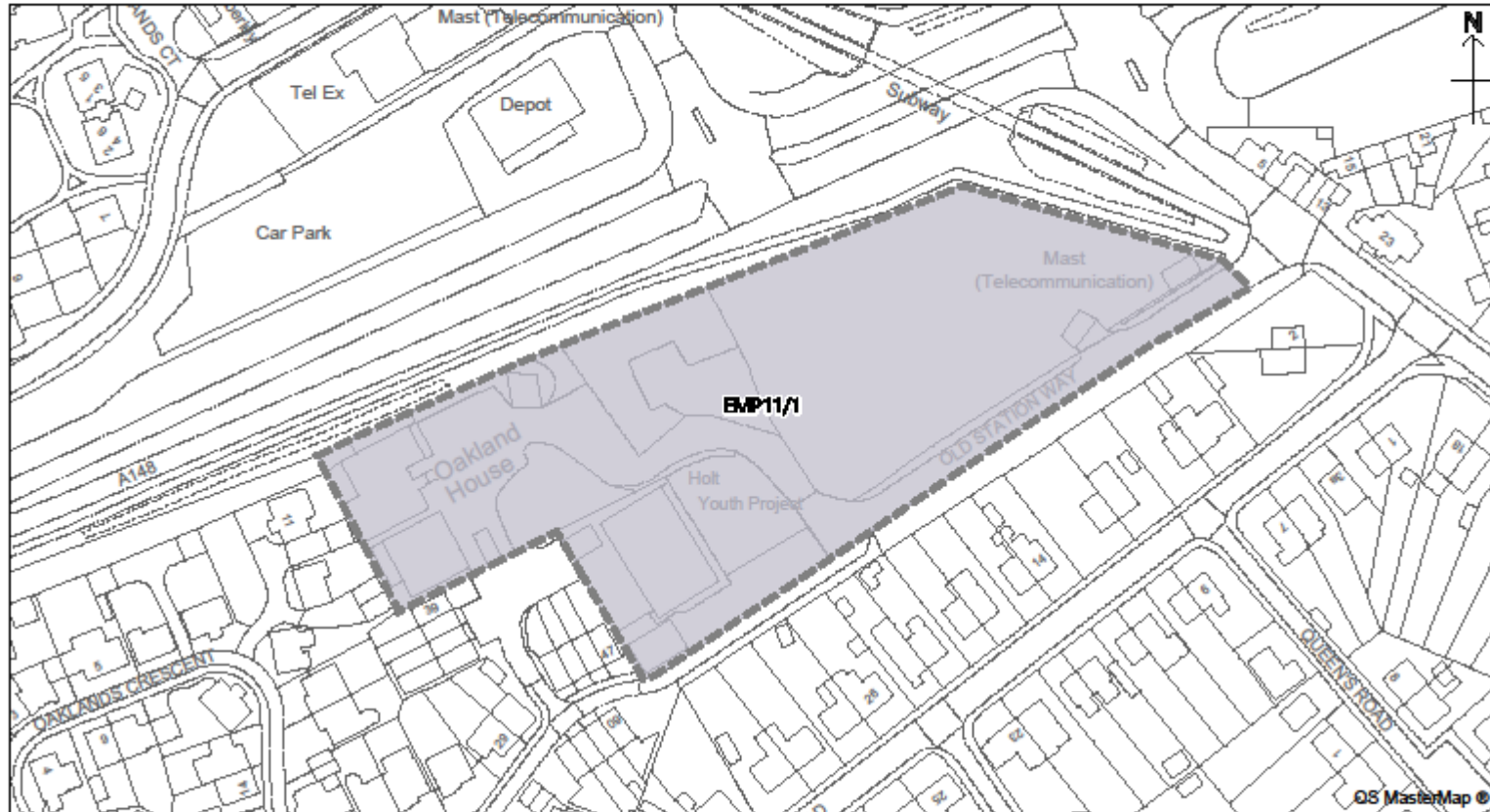
**Holt**

**New Designation: Hempstead Road Industrial Estate Extension (EMP10/1)**

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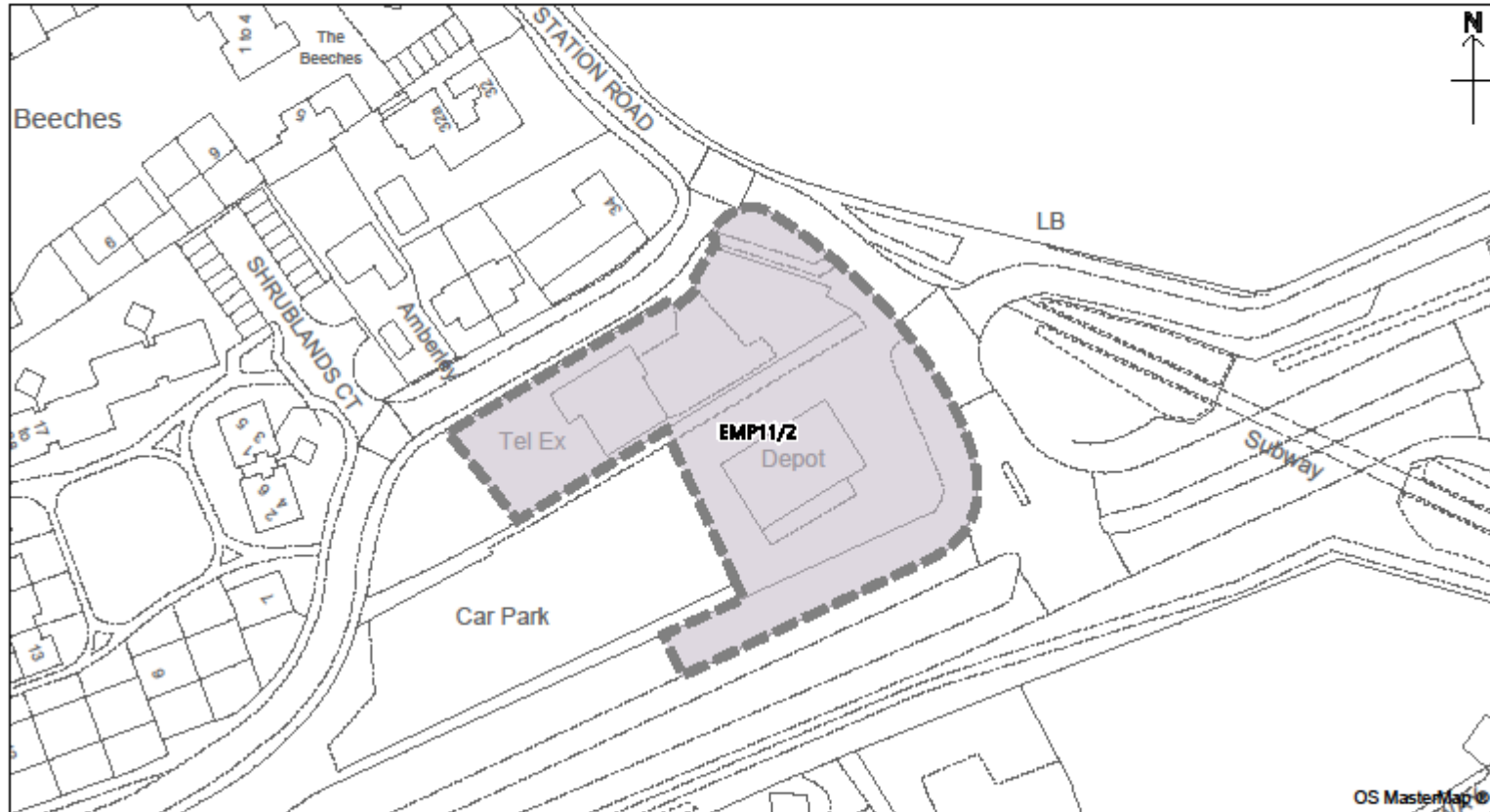
**Holt**

Old Station Way, Thaxters (EMP11/1)

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**Holt**

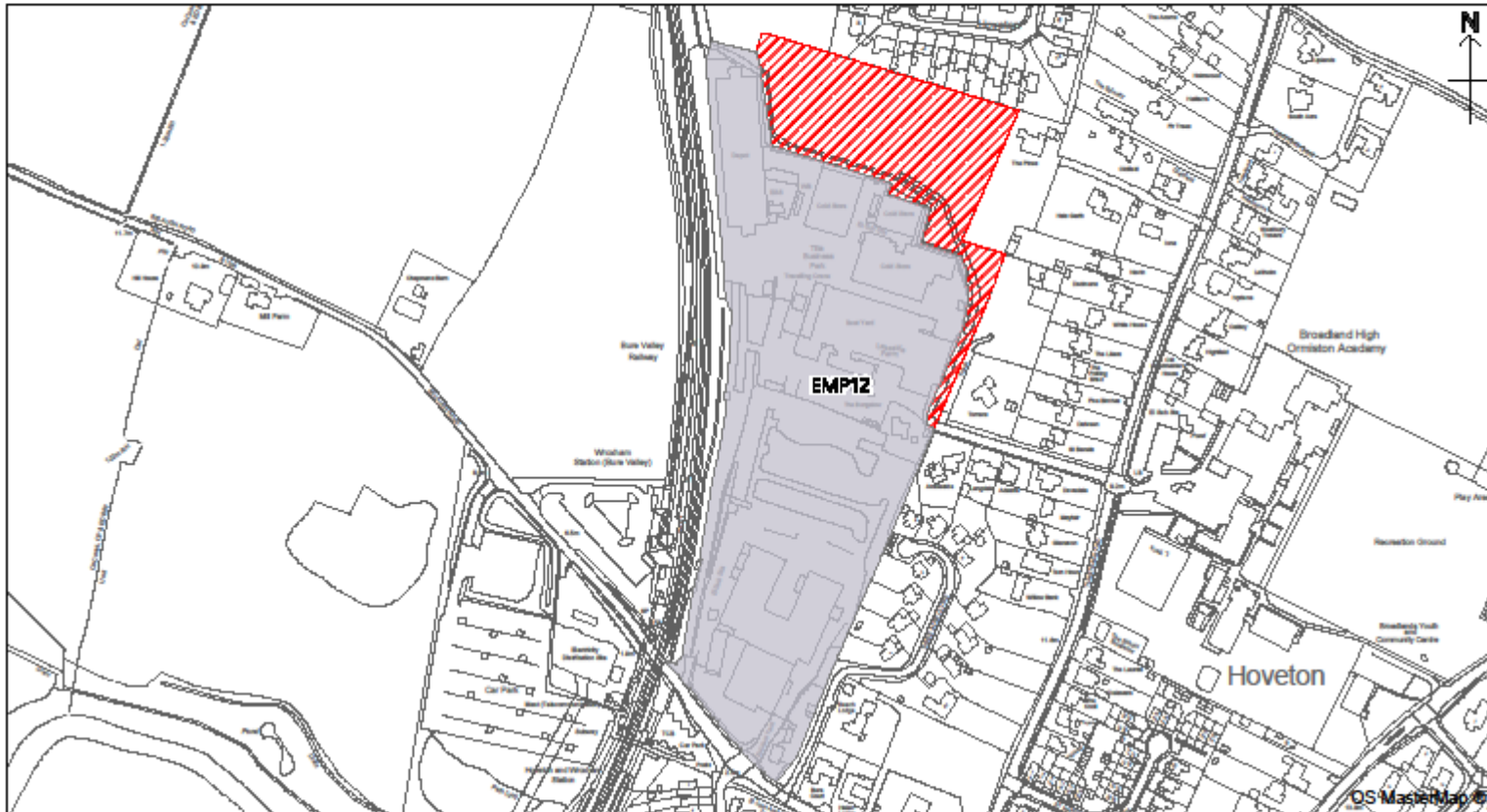
Old Station Way, Tyre Pro (EMP11/2)

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### Hoveton

Tunstead Road Industrial Estate (EMP12)

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**Hoveton**

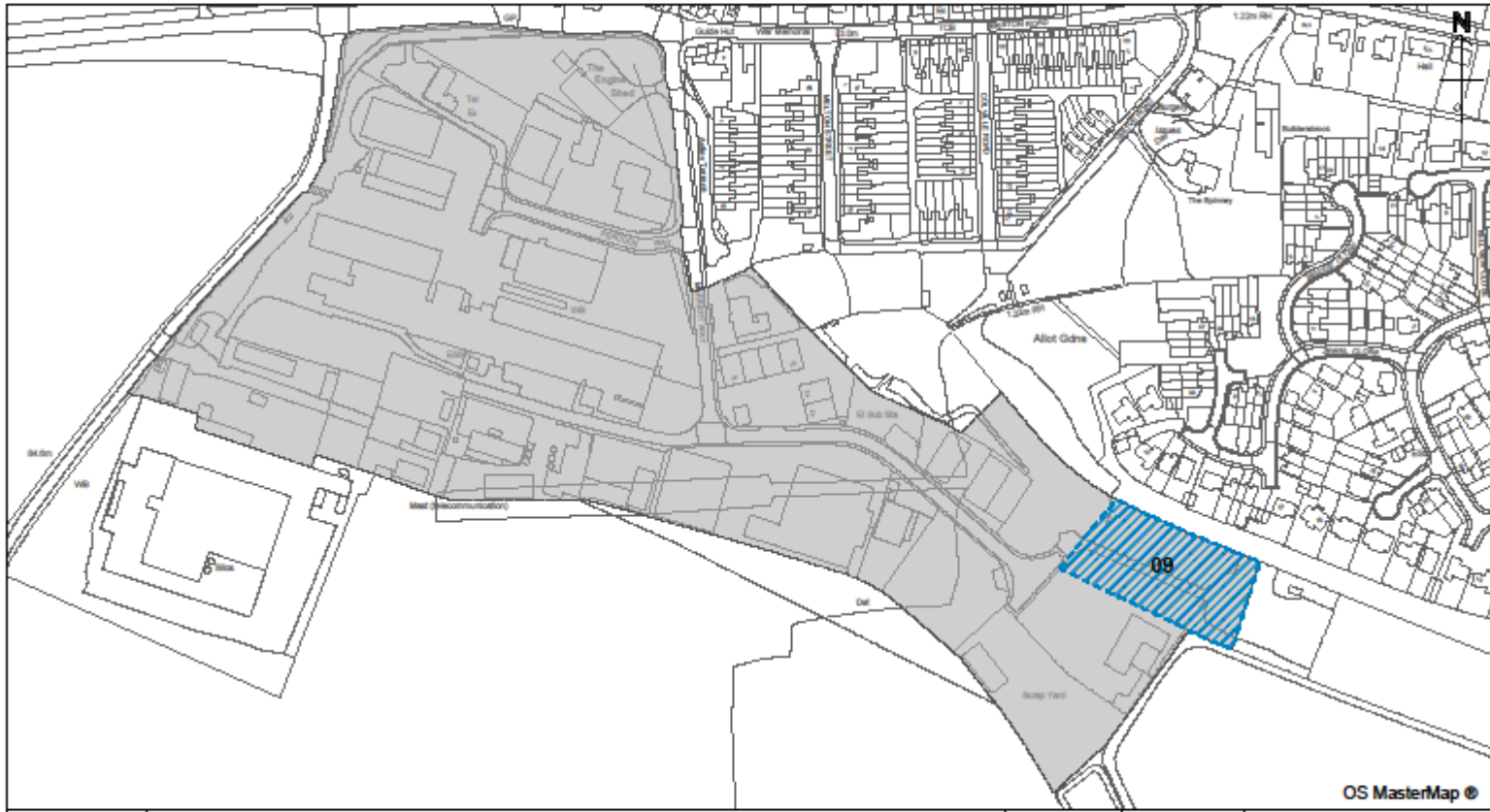
**Stalham Road Industrial Estate (EMP13)**

- Employment Designation
- Proposed Addition
- Proposed Deletion

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**Melton Constable**

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Melton Constable Industrial Estate, Marriott Way (EMP14)

- Employment Designation
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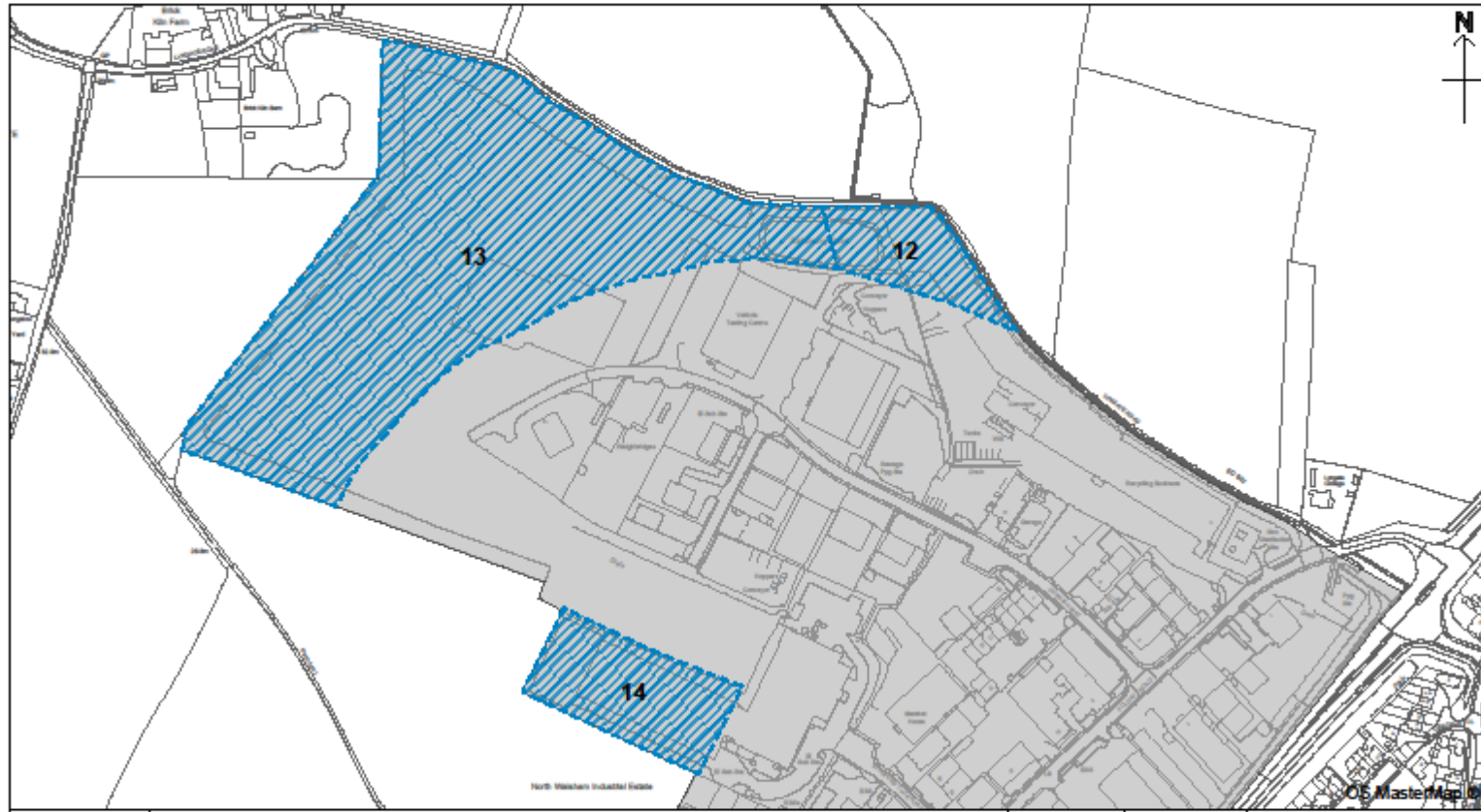
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**North Walsham**

North Walsham Industrial Estate (EMP15)

- Employment Designation
- Proposed Addition
- Proposed Deletion

Employment Boundary Review - June 2021

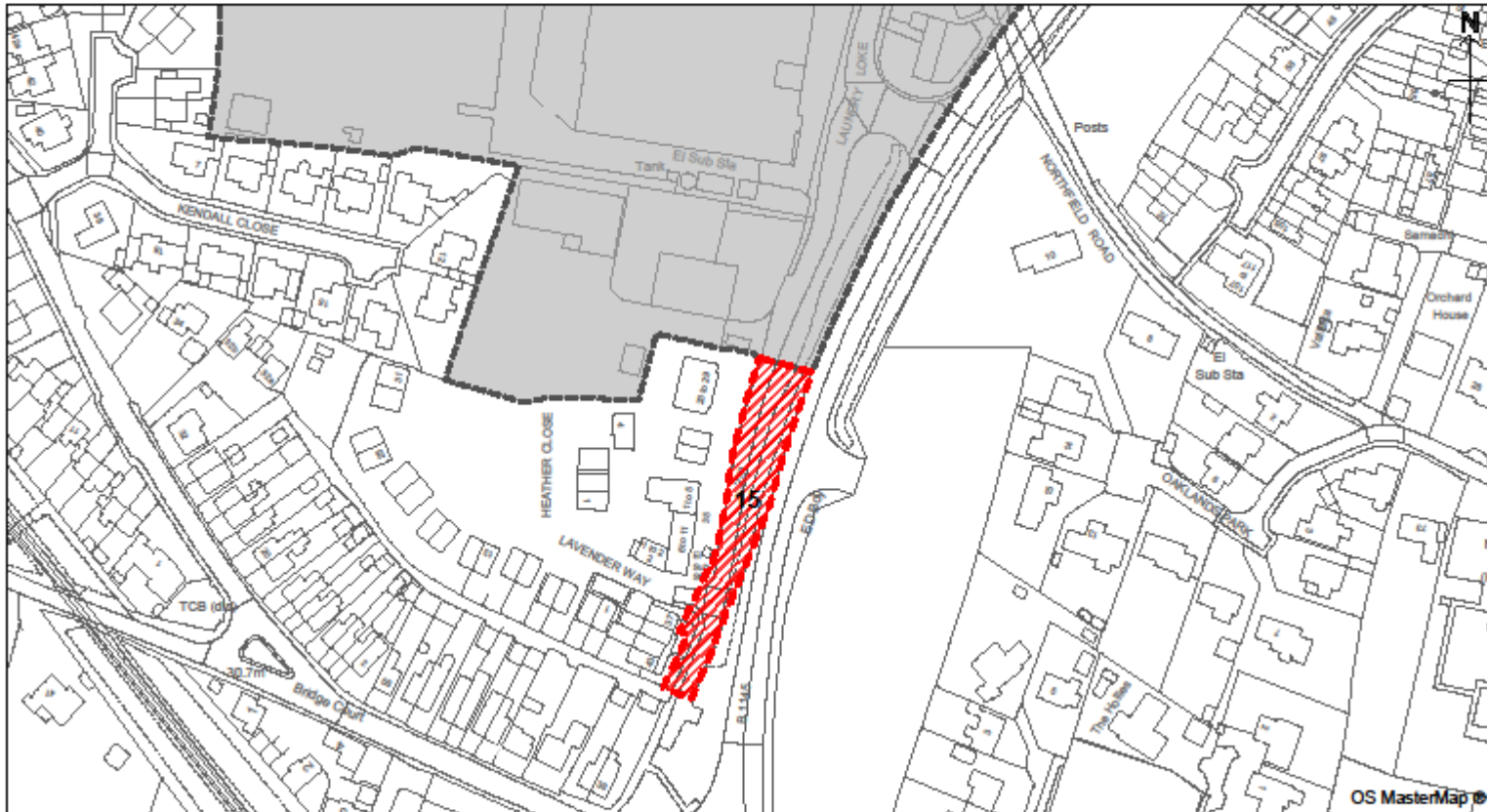
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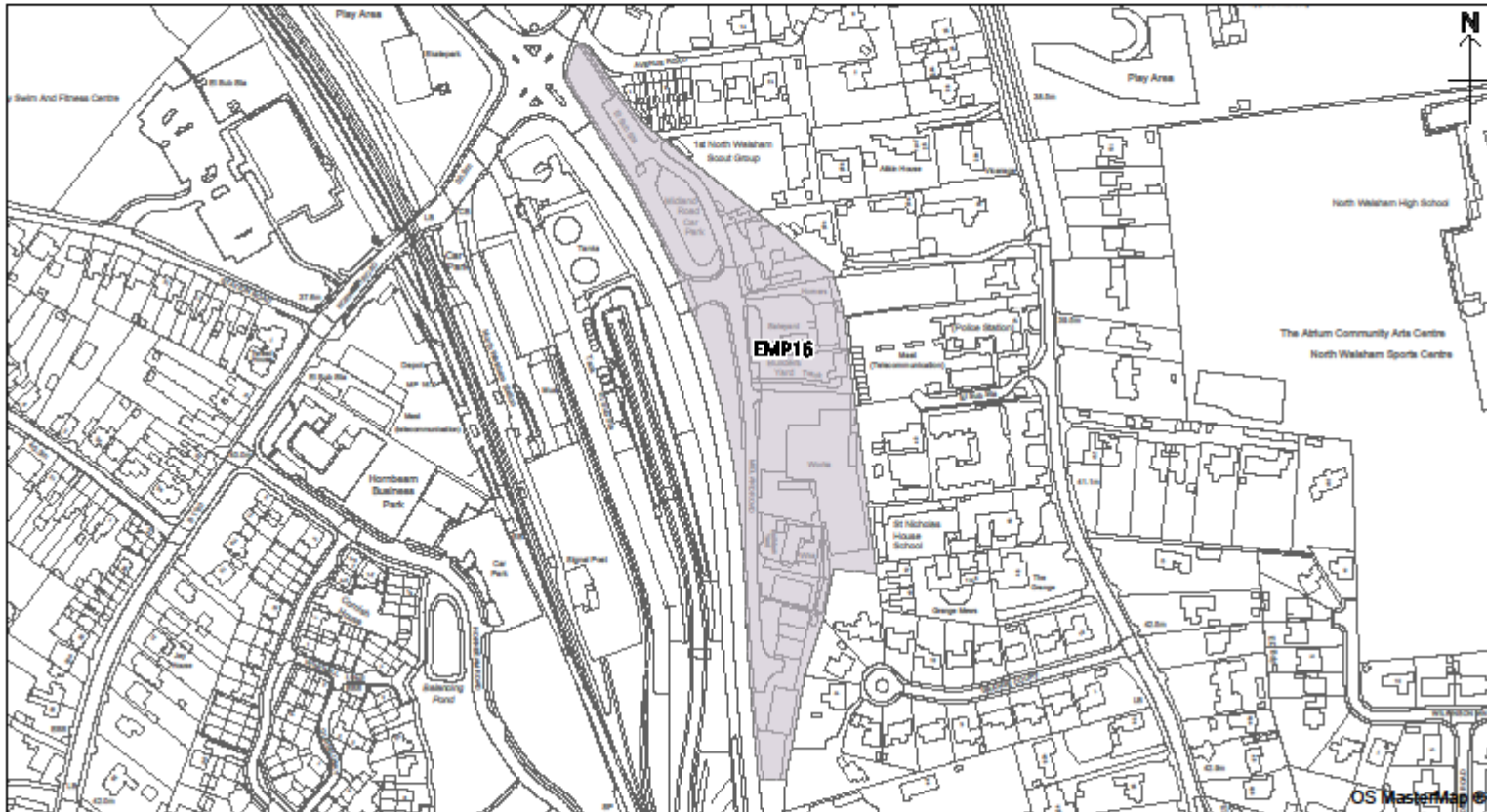
**North Walsham**  
 North Walsham Industrial Estate (EMP15)

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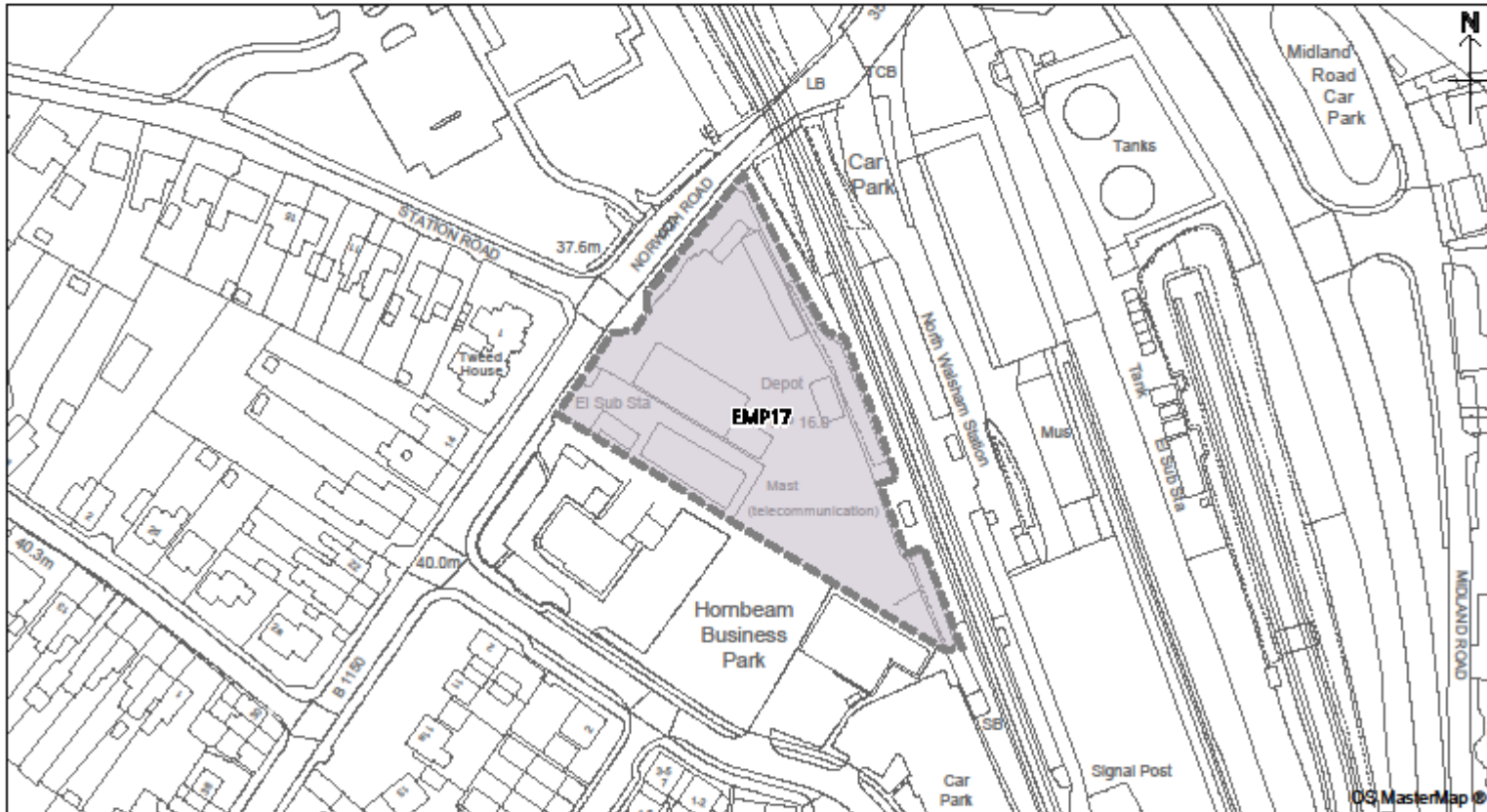


**North Walsham**  
Midland Road (EMP16)

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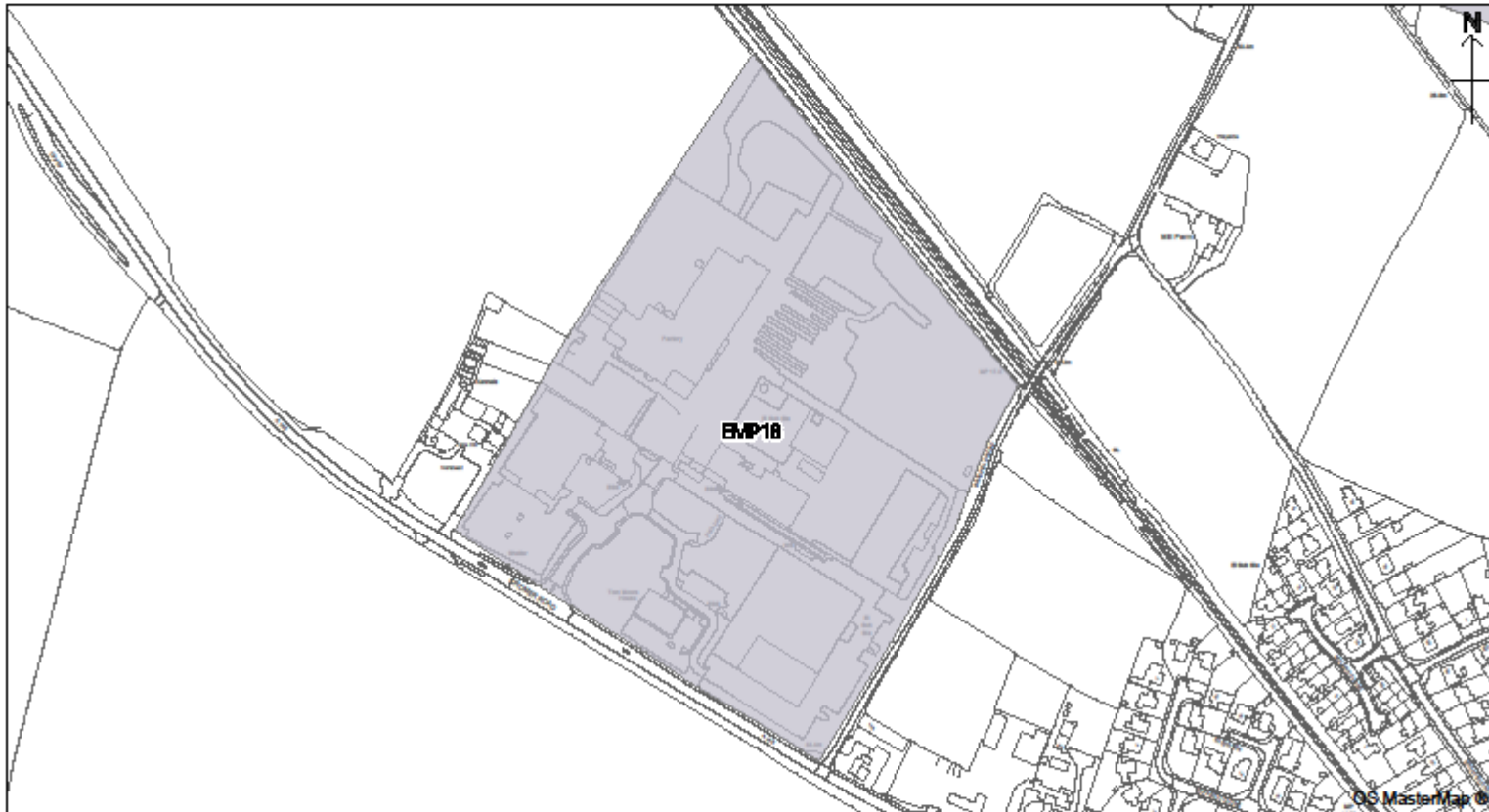


**North Walsham**  
**CT Baker Builders Yard (EMP17)**

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**North Walsham**

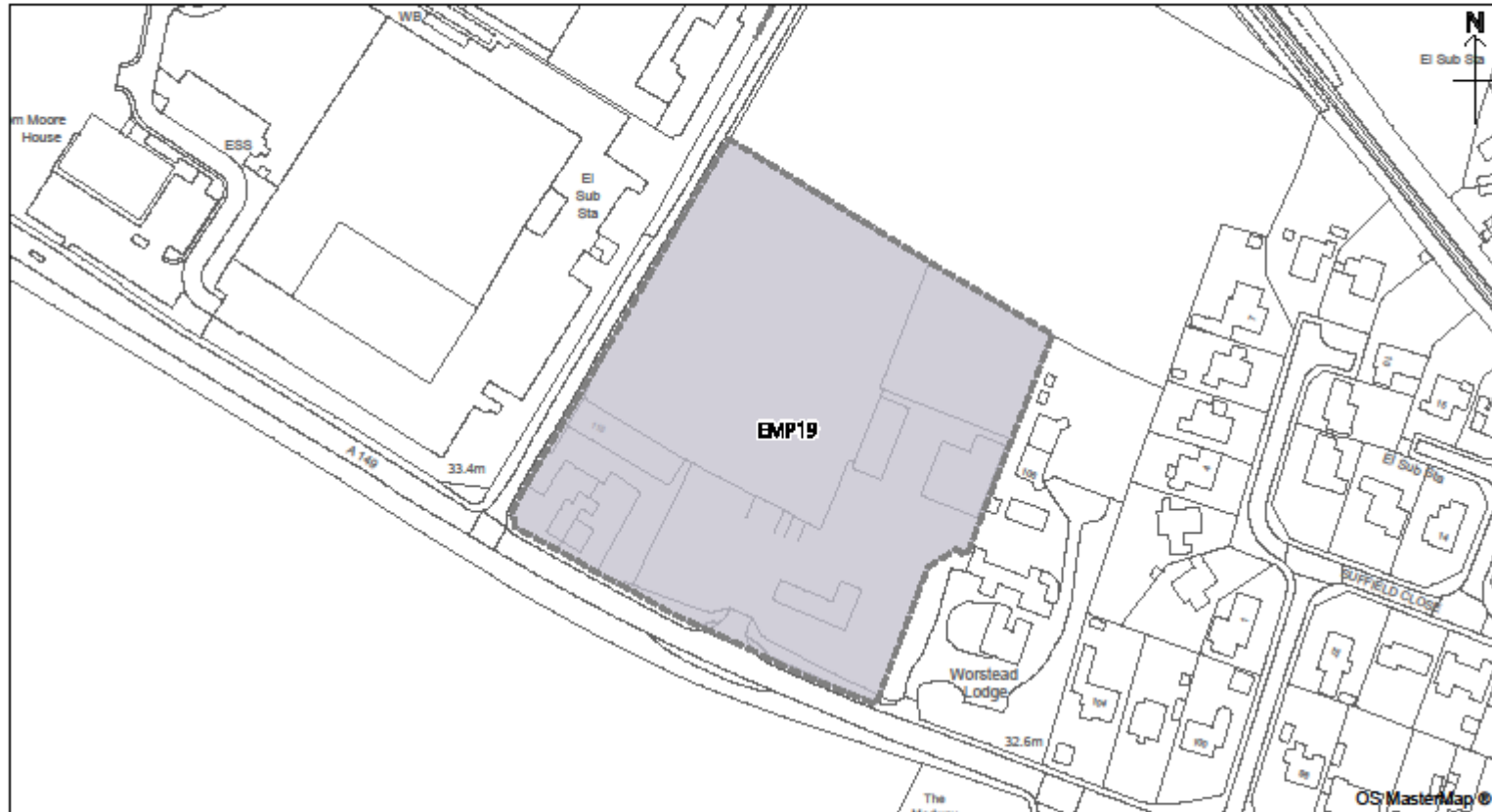
Bradfield Road Industrial Estate West (EMP18)

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**North Walsham**

Bradfield Road Industrial Estate East (EMP19)

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#### Weybourne Road Industrial Estate (EMP20)

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**Stalham**

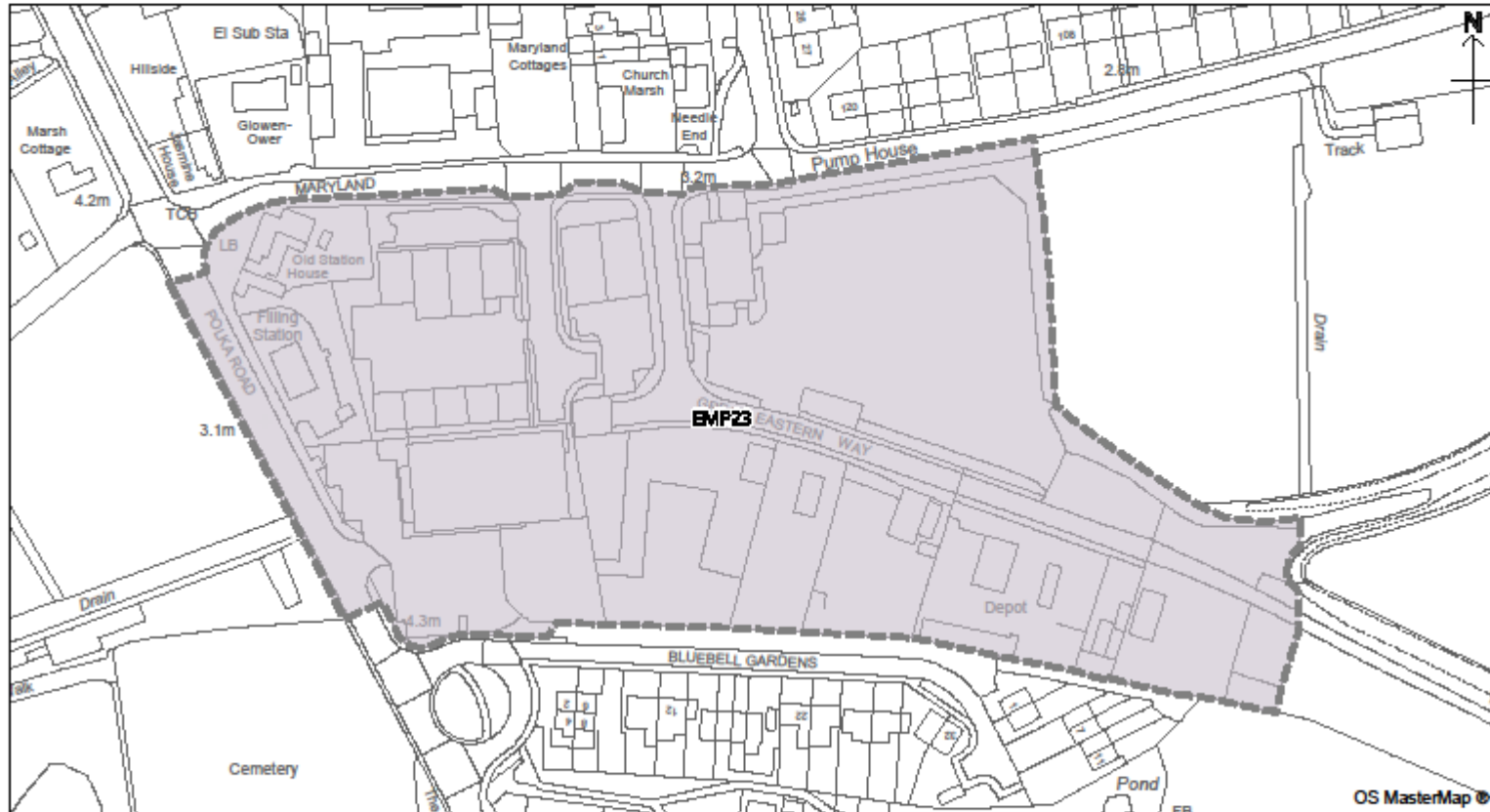
Nicholson's Yard, Yarmouth Road (EMP21)

- Employment Designation
- Proposed Addition
- Proposed Deletion

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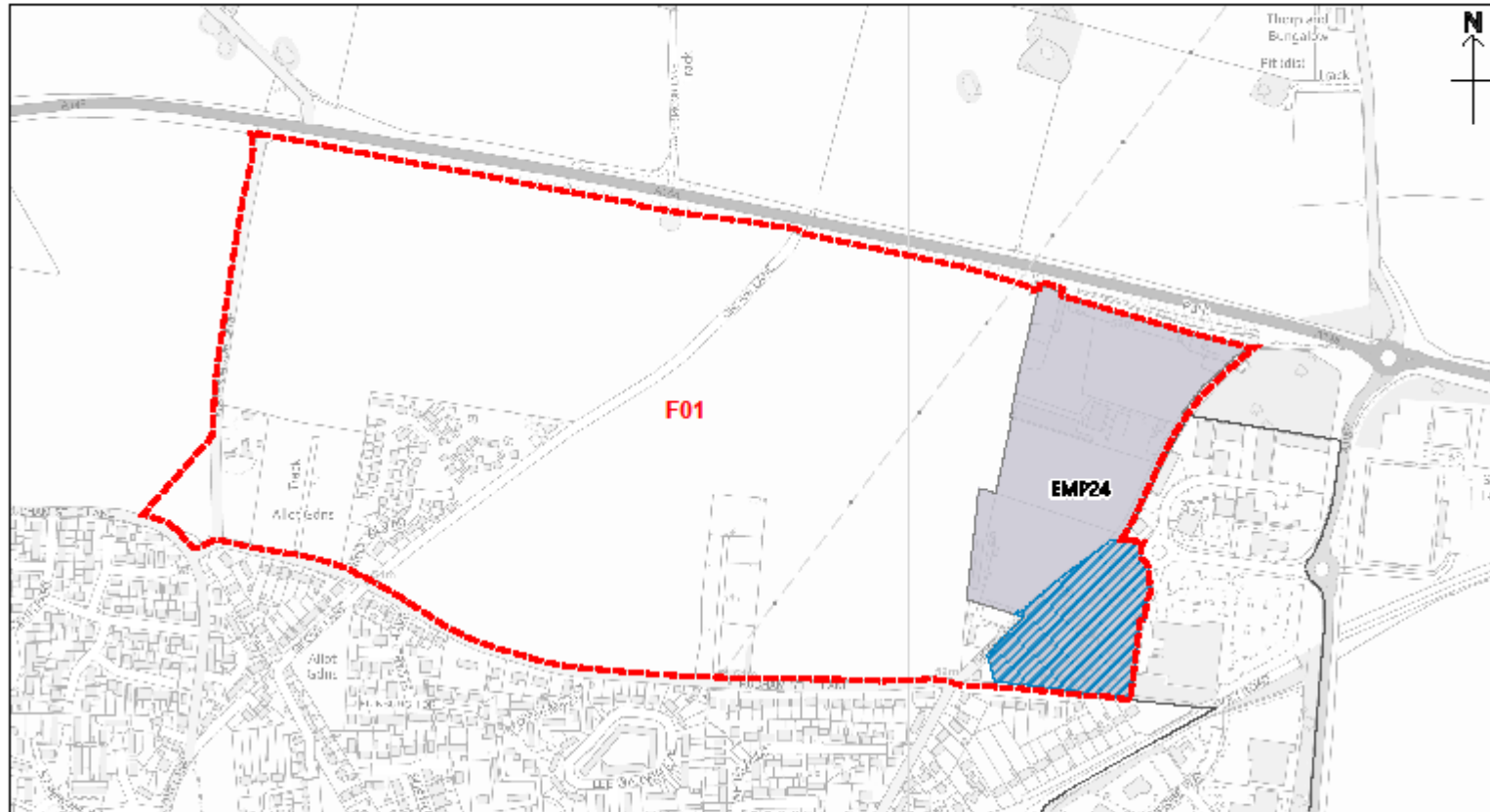


**Wells-Next-The-Sea**  
Great Eastern Way / Polka Road (EMP23)

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**Fakenham**

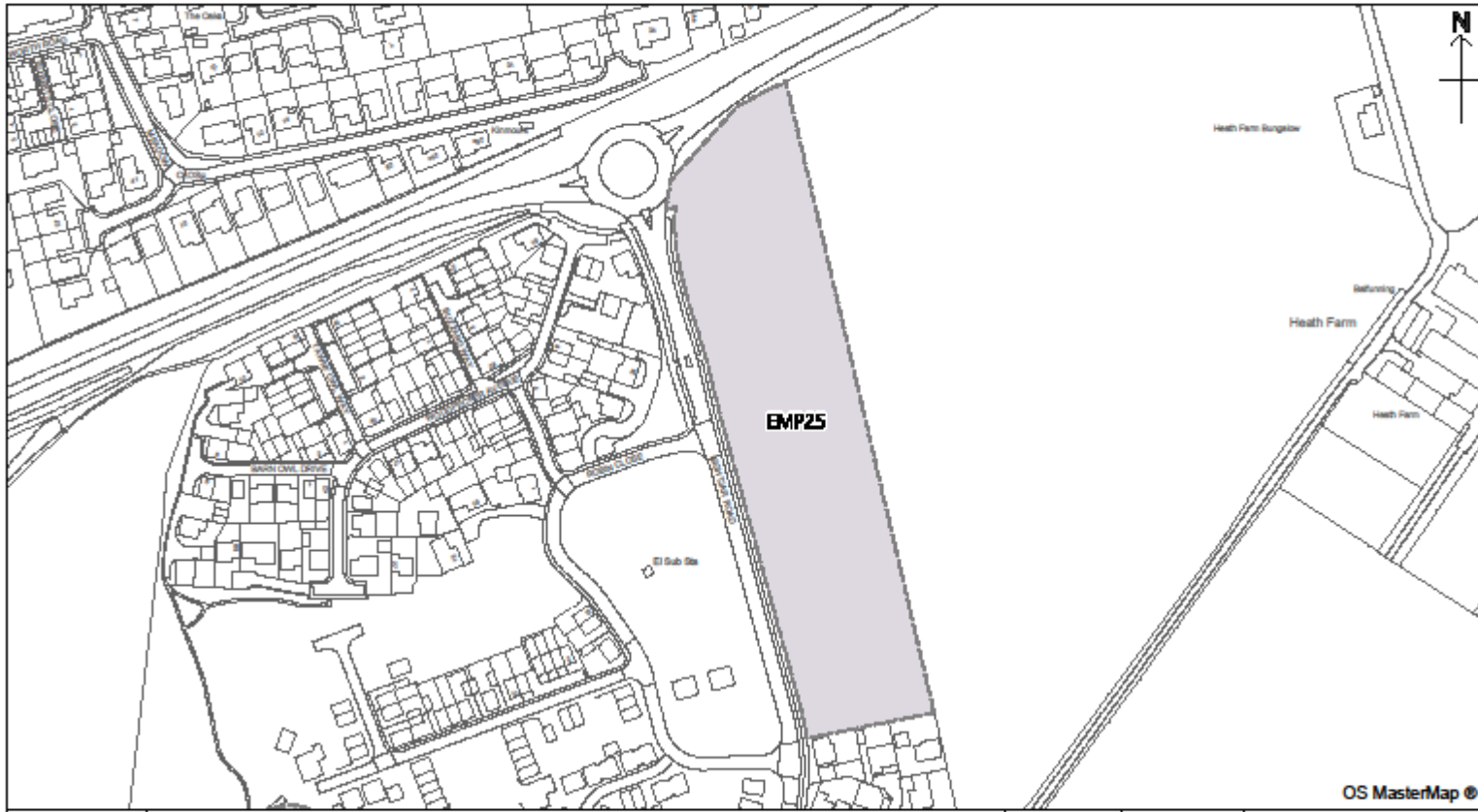
Employment Boundary Review - June 2021

**New Designation: Fakenham Commerce Park Extension (EMP24)**

Proposed Employment Designation
  Proposed Addition
  LDF Mixed-Use Allocation

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 New Designation: Nightjar Road (EMP25)  
 Proposed Employment Designation


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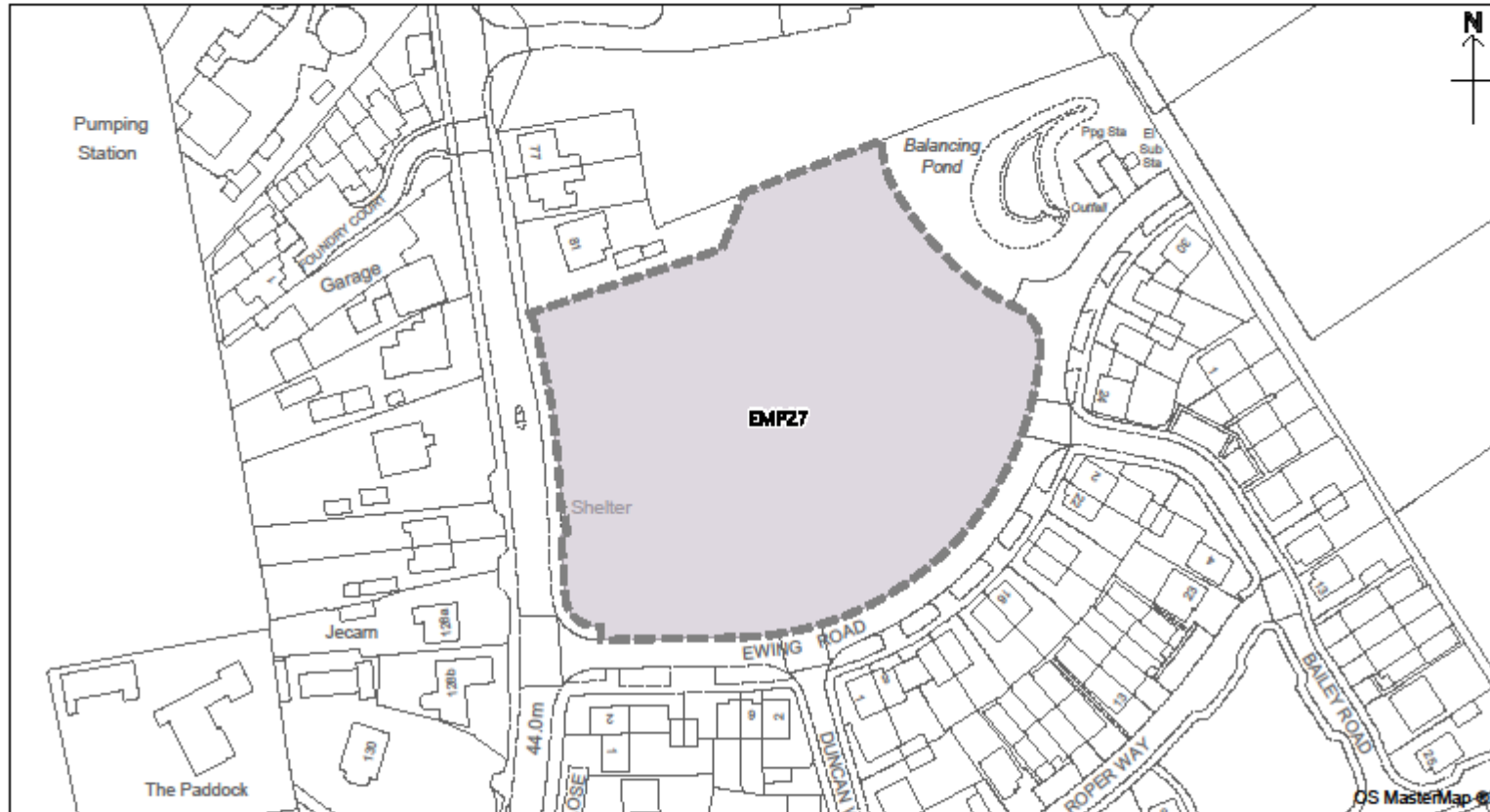
**North Walsham**

**New Designation: Hombeam Business Park (EMP26)**

 Proposed Employment Designation

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New Designation: Ewing Road (EMP27)

Proposed Employment Designation

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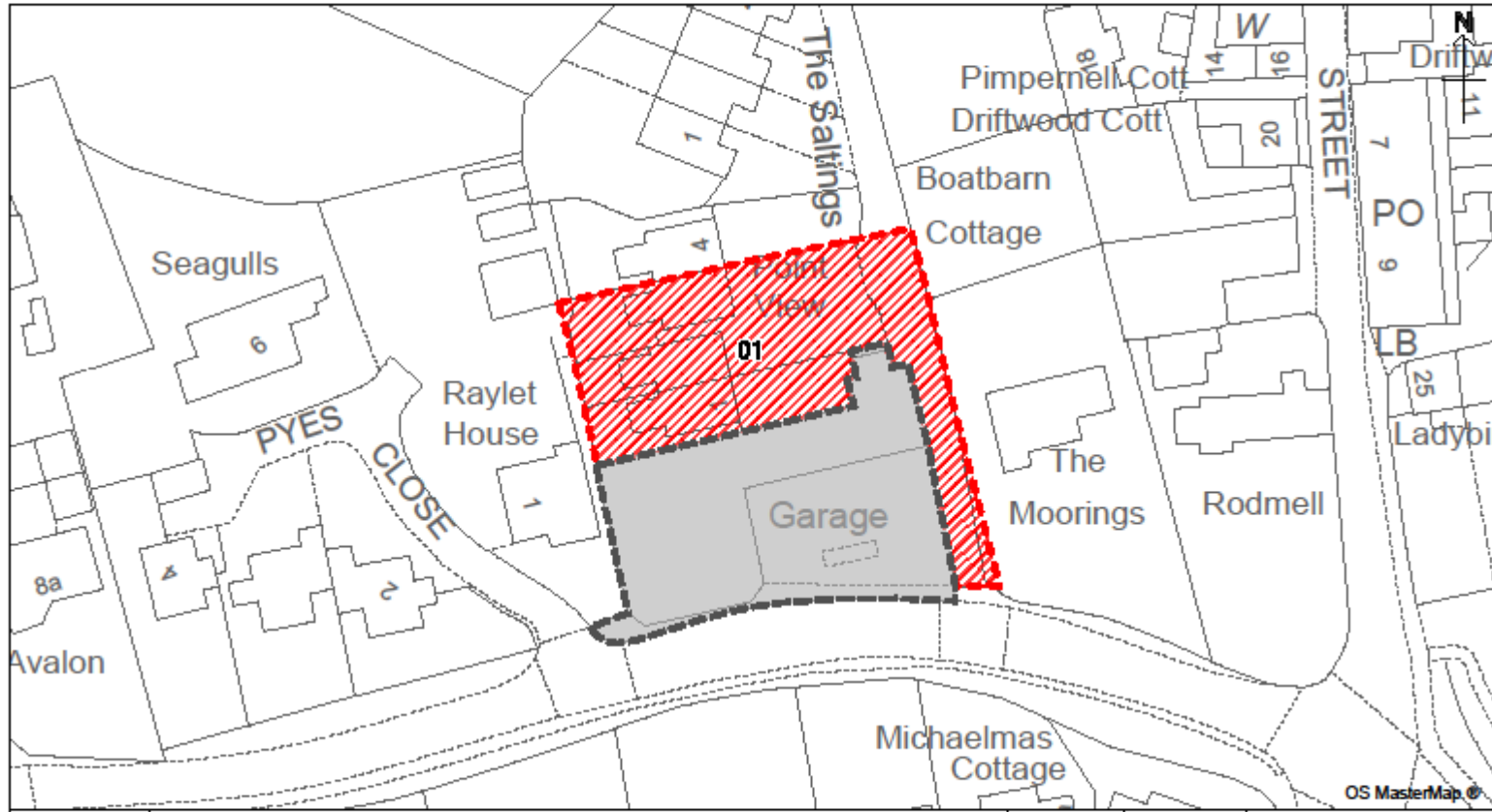
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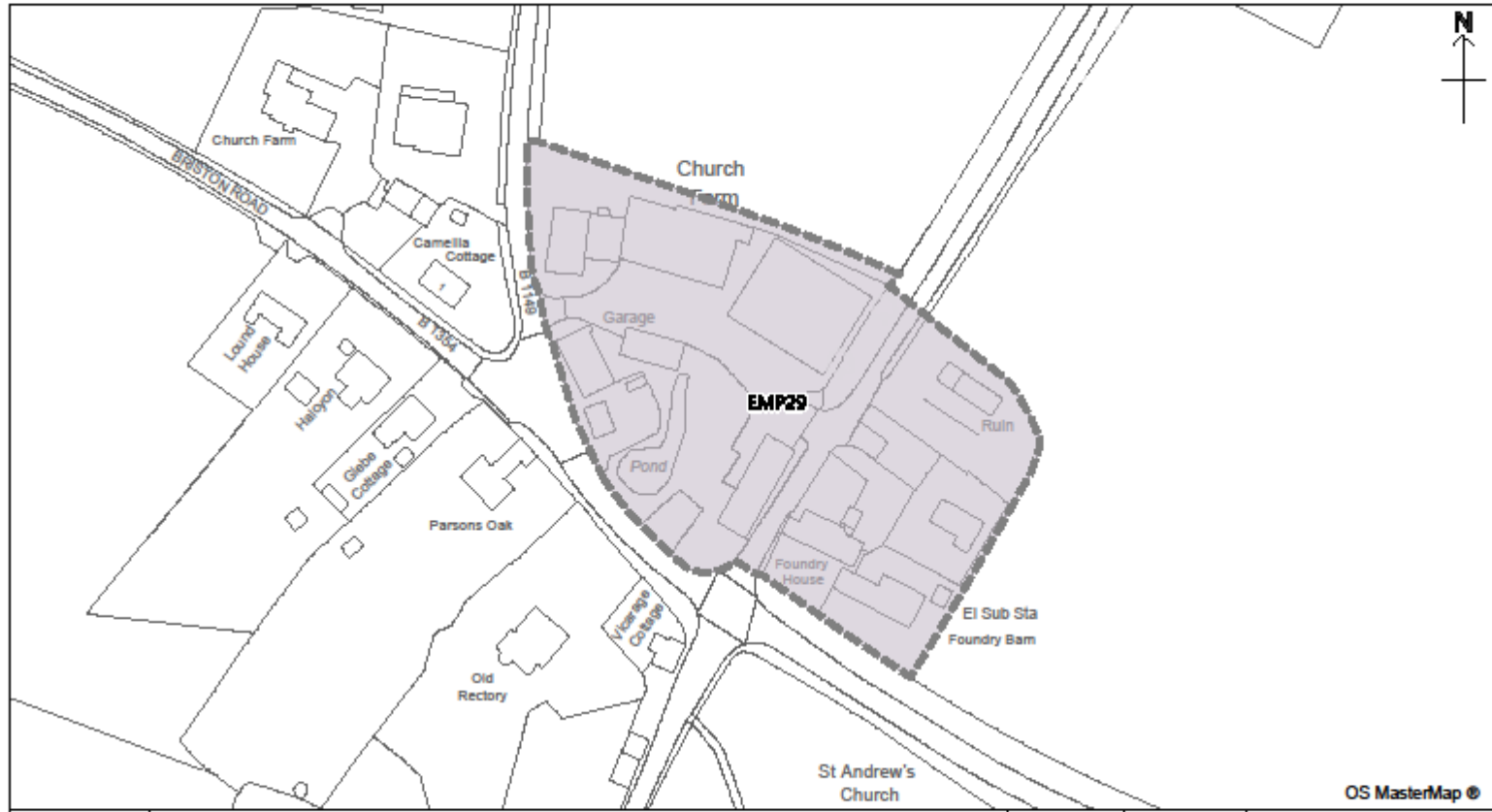
**Blakeney**  
Land off North Road (EMP28)

- Employment Designation
- Proposed Addition
- Proposed Deletion

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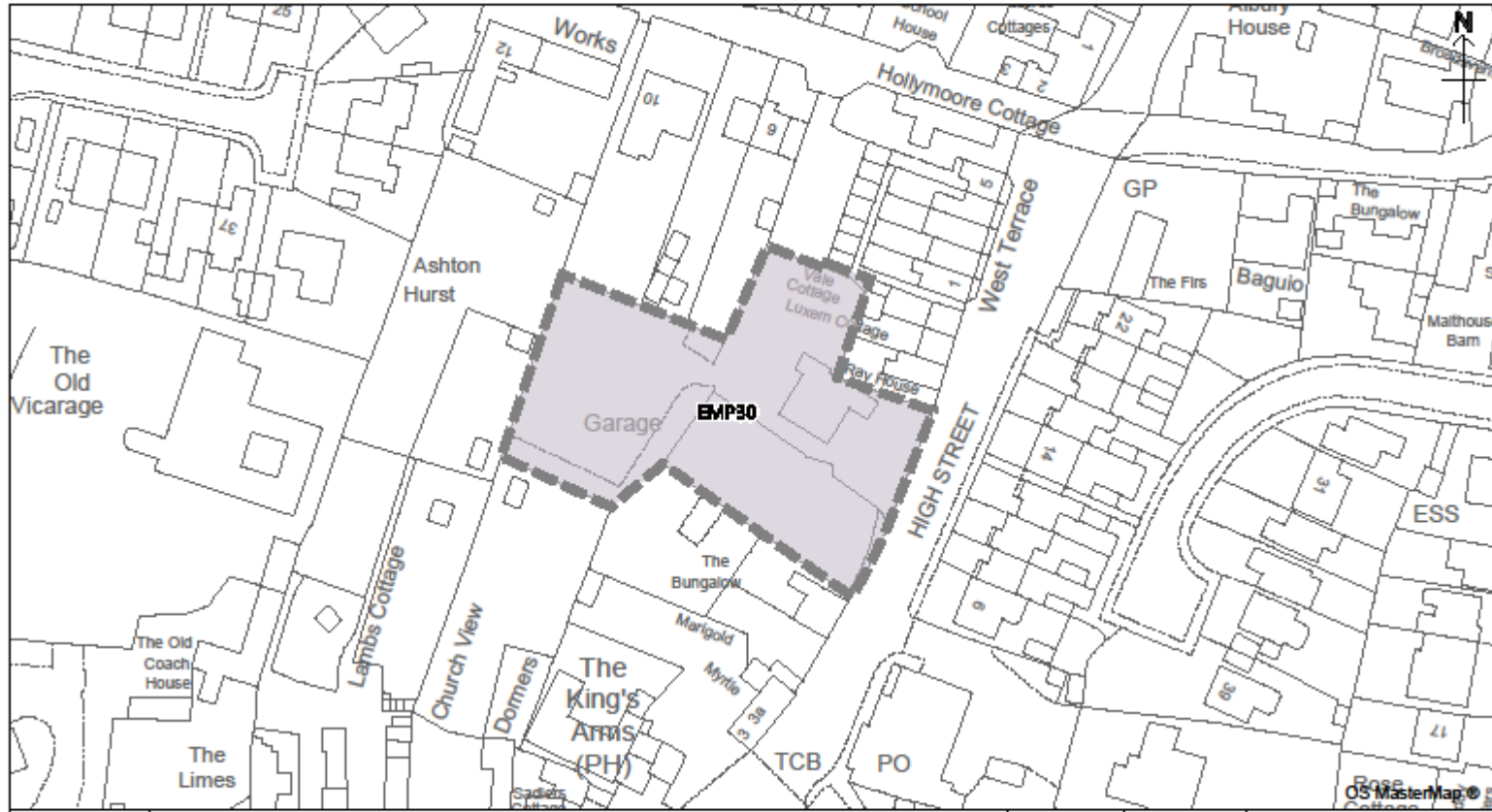
**Corpusty**

Land North of B1149 (EMP29)

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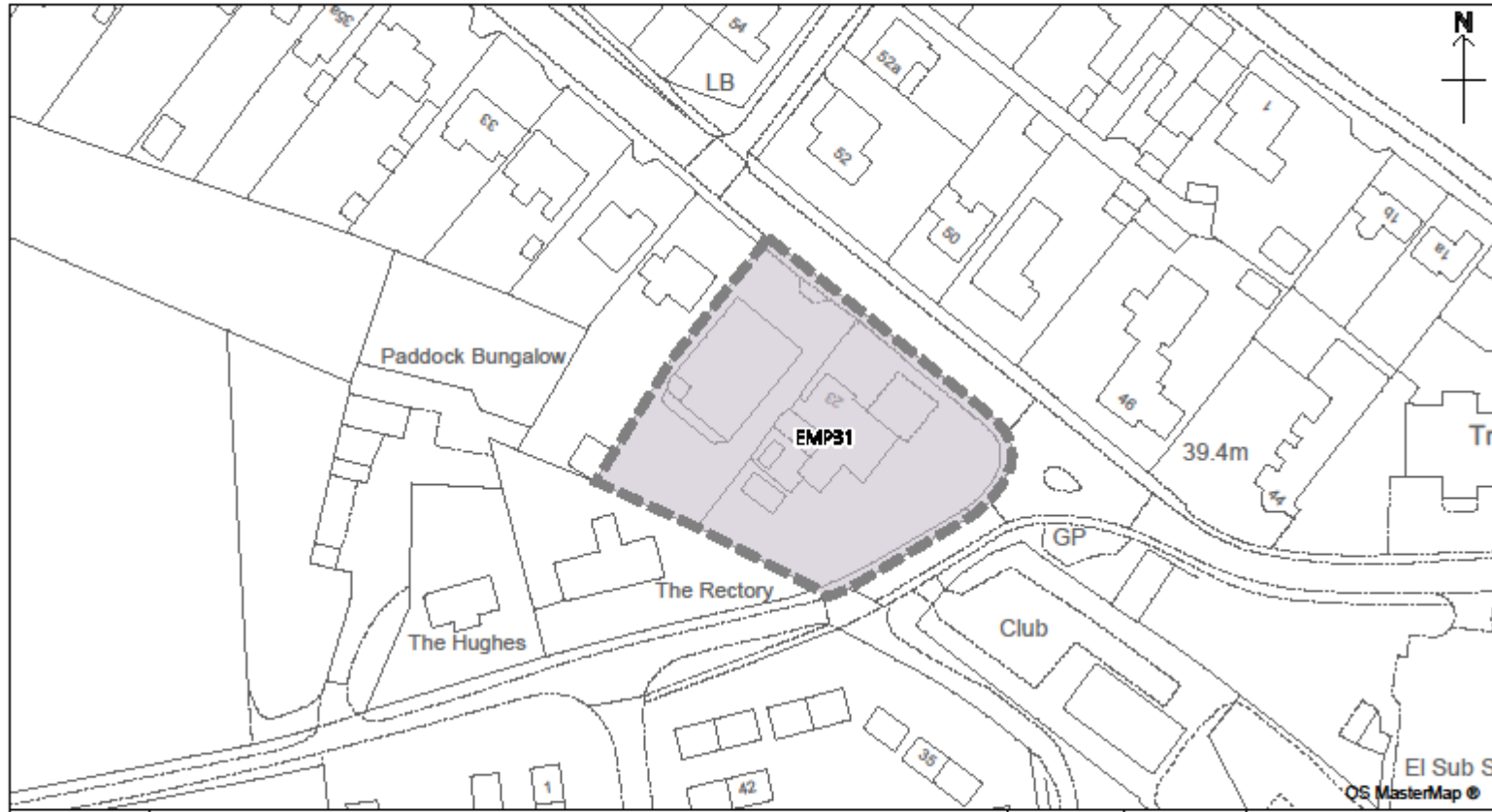
**Ludham**

Garage Site, High Street (EMP30)

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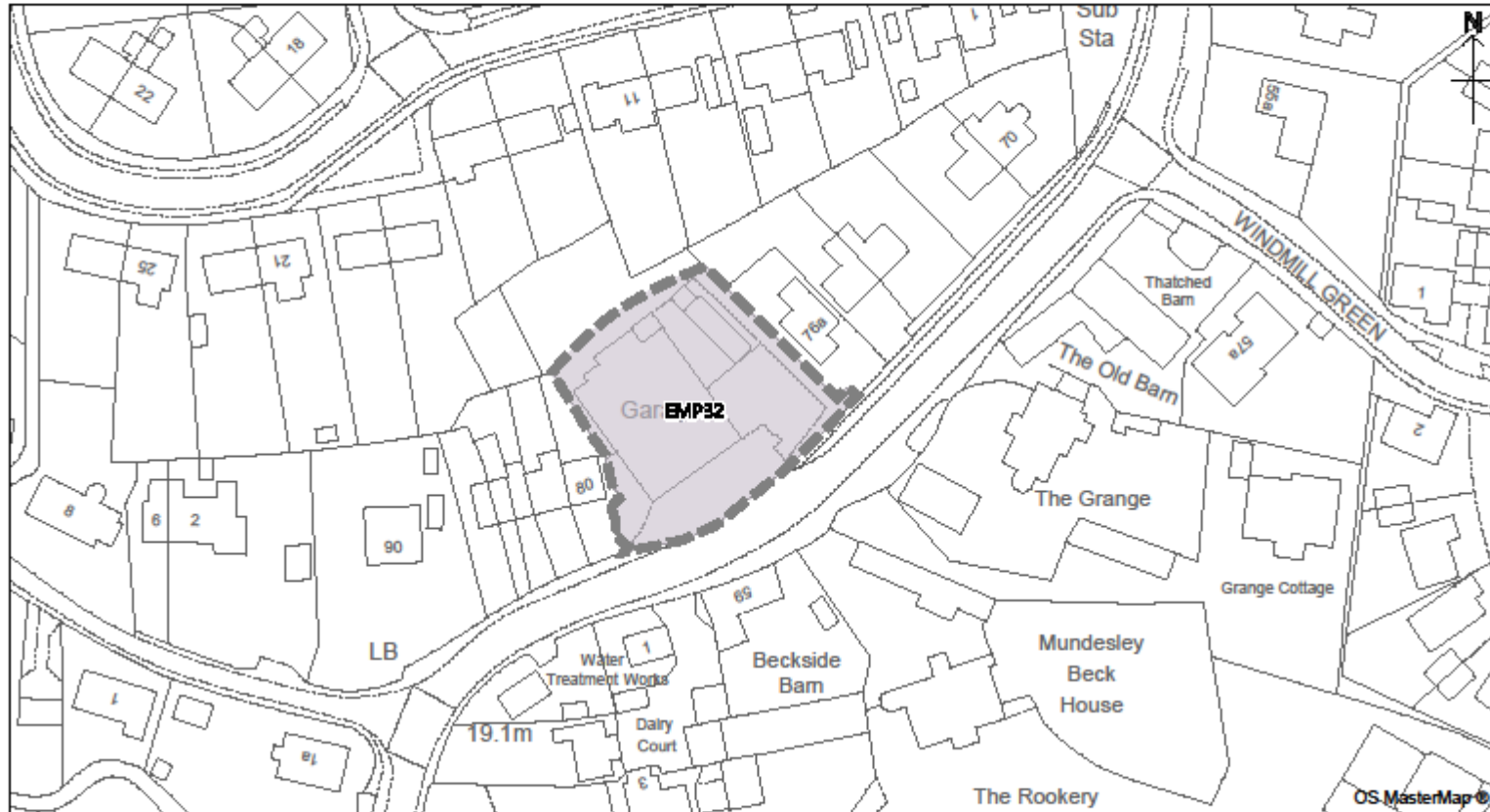


**Mundesley**  
Land South of Cromer Road (EMP31)

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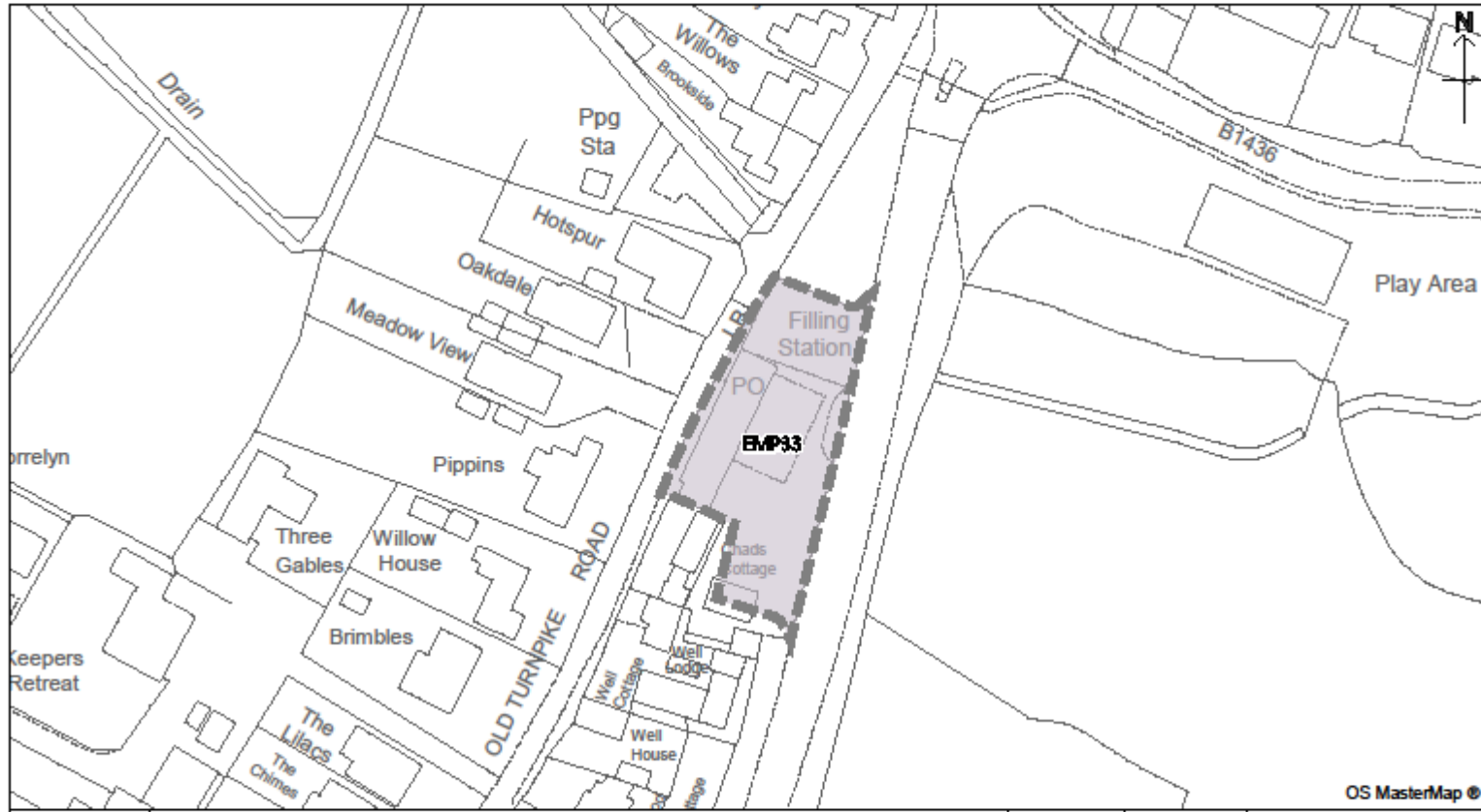
**Mundesley**

Garage Site, North of High Street (EMP32)

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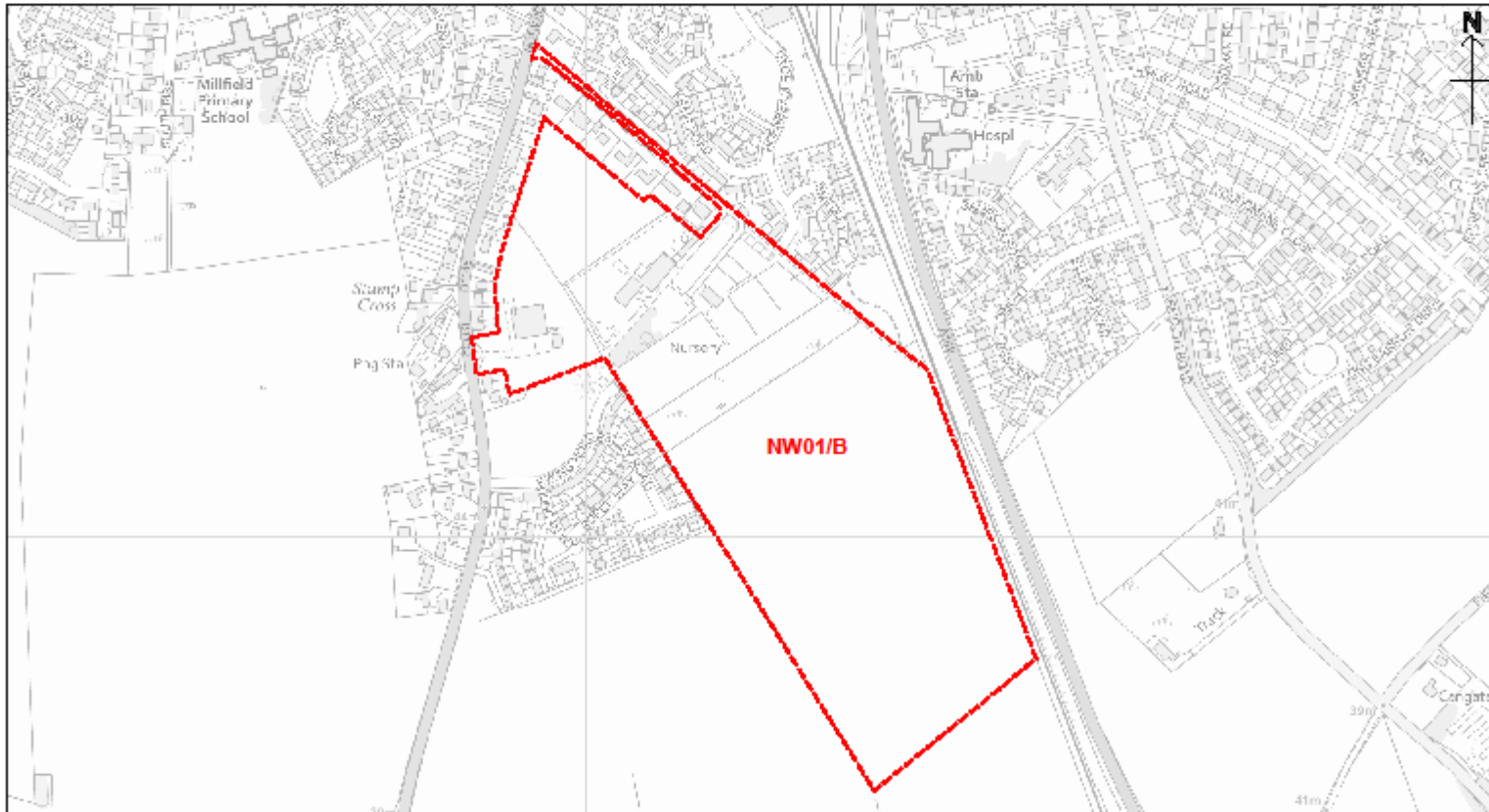


**Roughton**  
Land off Norwich Road (EMP33)

Proposed Employment Designation

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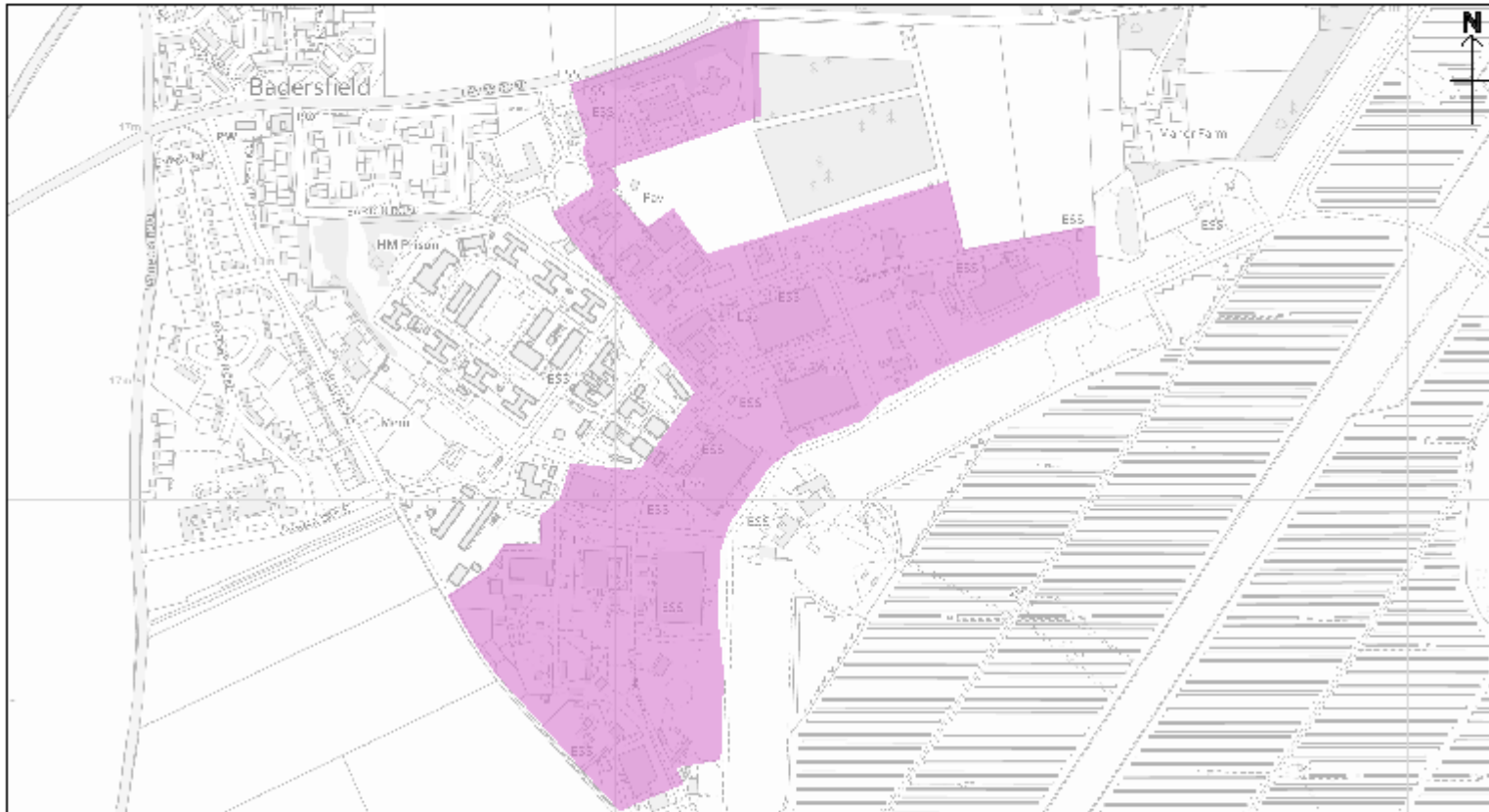
**North Walsham**

Land at Norwich Road & Nursery Drive (NW01/B)

 Proposed Mixed-Use Allocation

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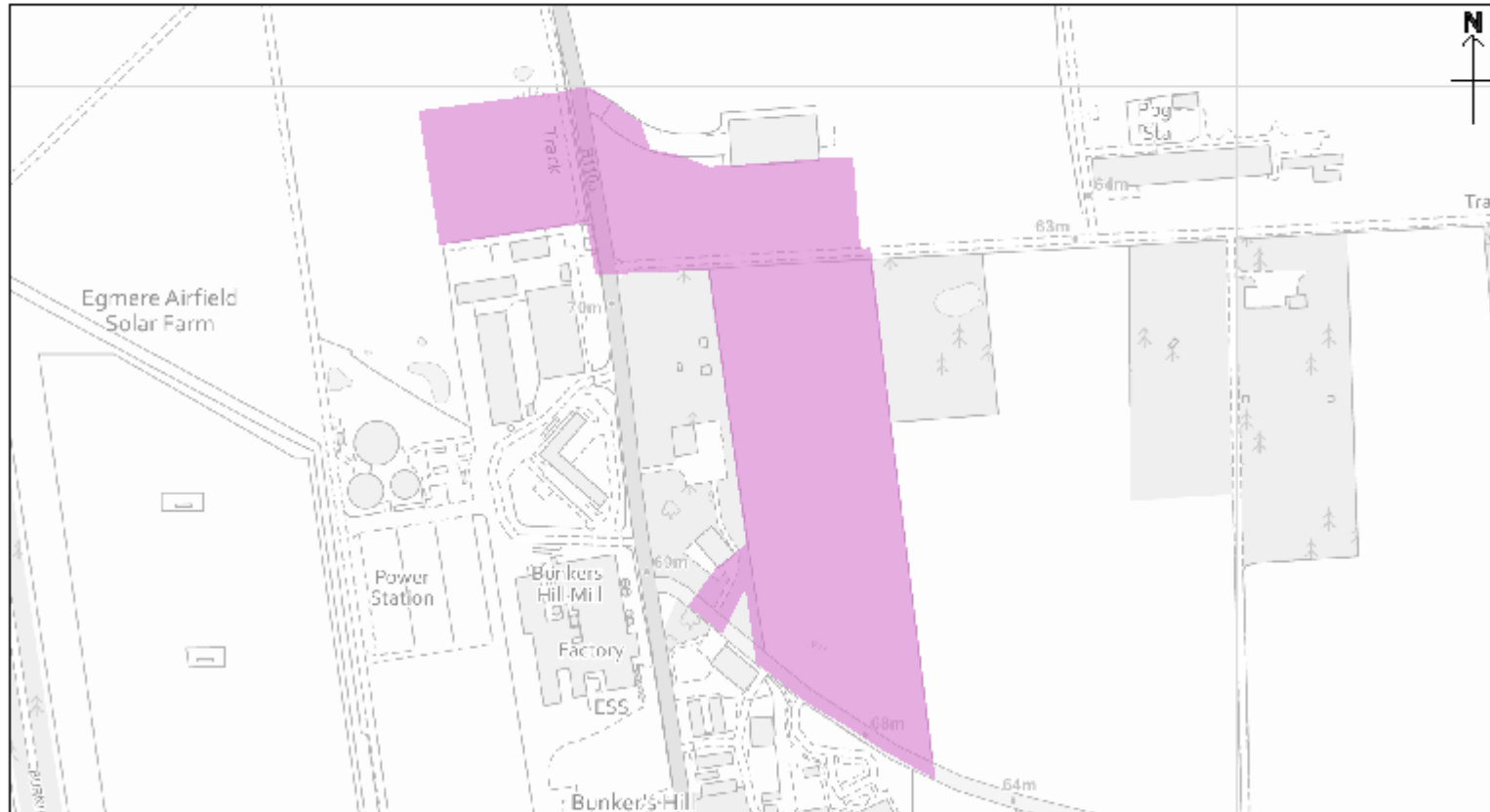
**Scottow**  
**Scottow Enterprise Park**

Enterprise Zone


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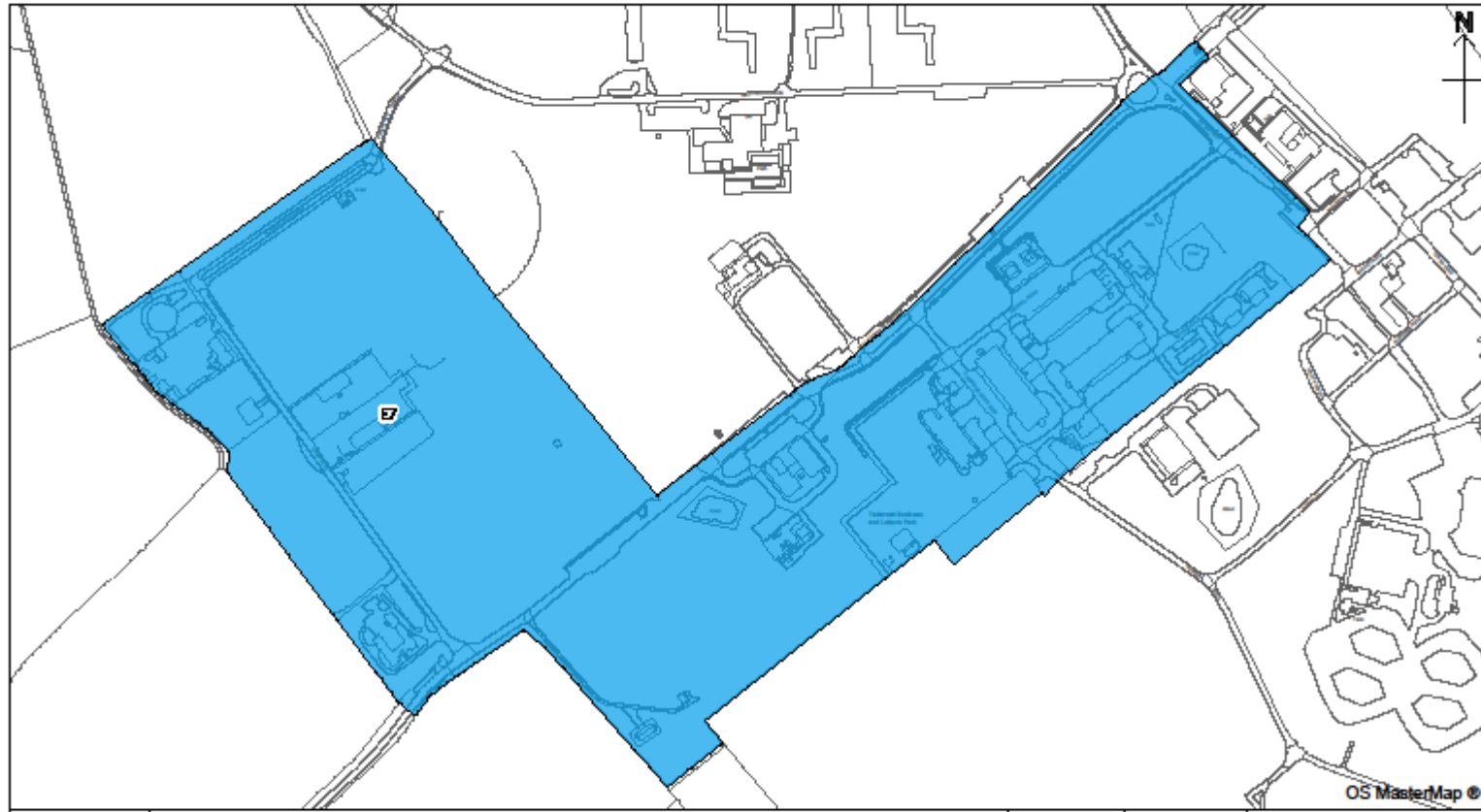


**Egmere**  
Egmere Business Zone

 Enterprise Zone

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**Tattersett**

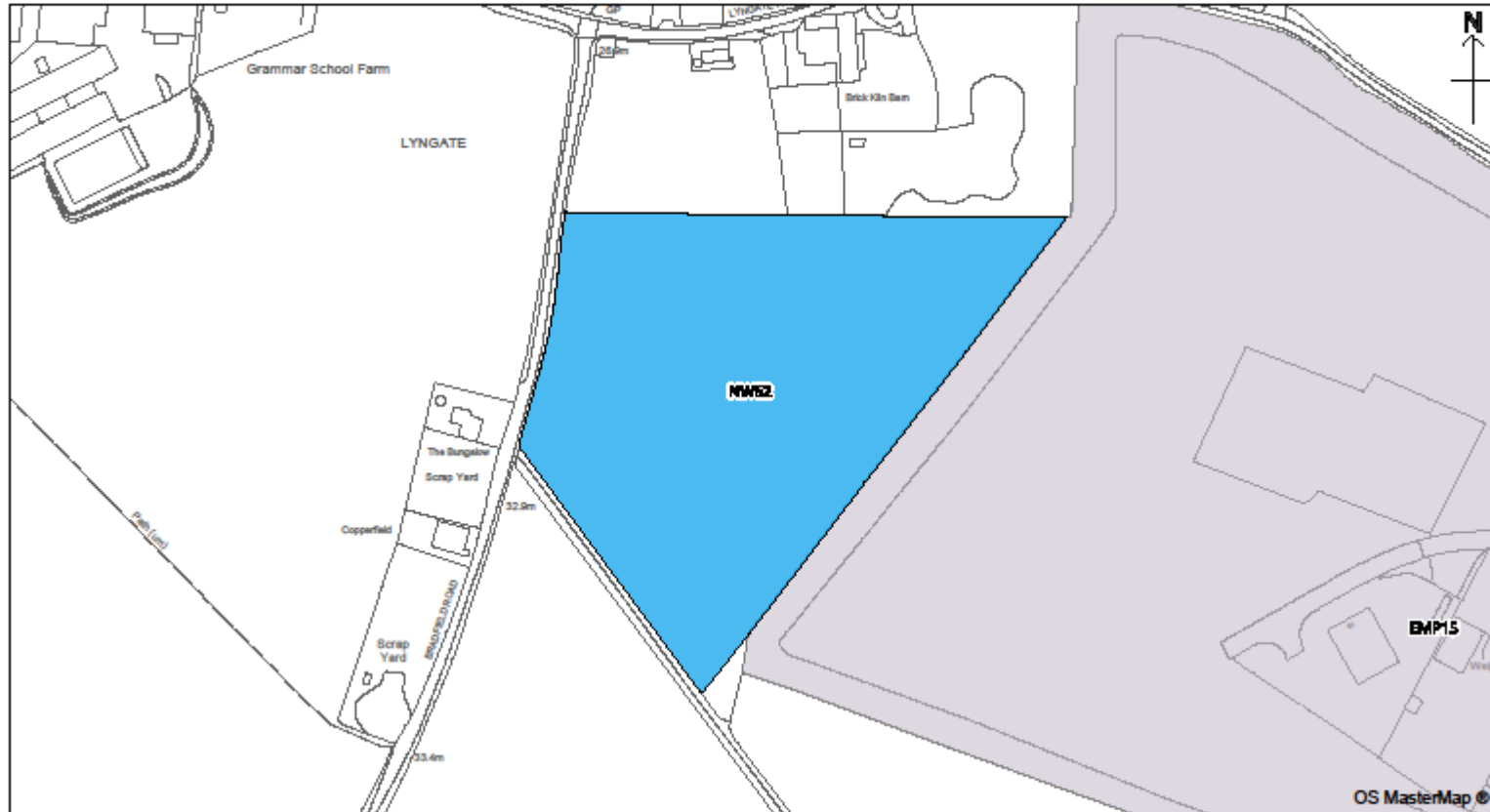
Re-Allocation: Tattersett Business Park (E7)

Employment Designation
  Proposed Allocation

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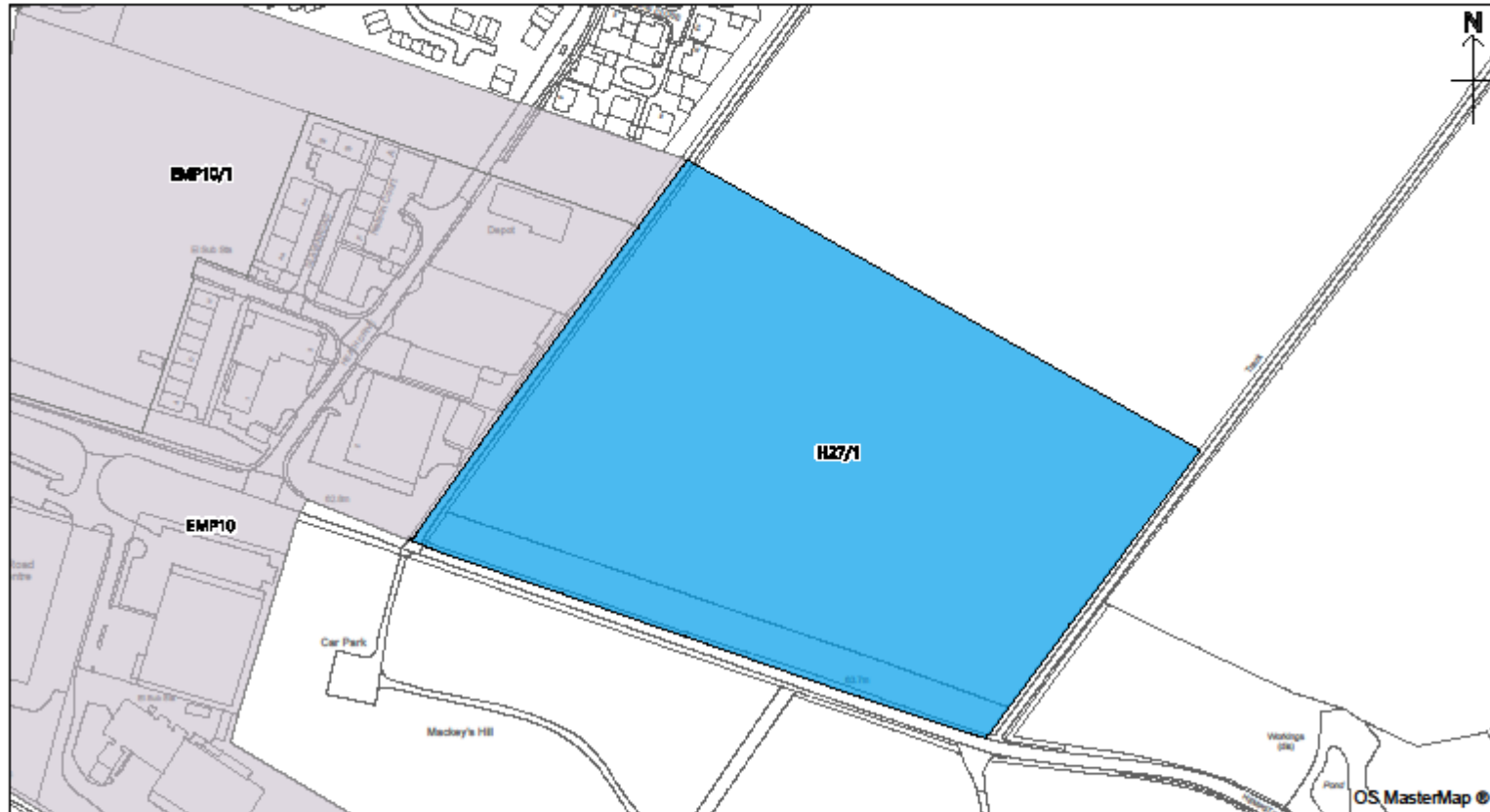
**North Walsham**  
 New Allocation: North Walsham Industrial Site Extension  
 Land East of Bradfield Road (NW52)

Employment Designation
  Proposed Allocation

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**Holt**

**New Allocation: Land at Heath Farm (H27/1)**

Employment Designation
  Proposed Allocation

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## Appendix 3

### Site Assessment of Designated Employment Land 2019

Source: Background Paper 3 Regulation 18, 2019.

Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
<b>Blakeney Land off North Road</b>	1.8	N/A	<b>Low</b>	<b>Medium</b>	<b>Low</b>	<p>The site is situated within a Coastal Service Village within the Core Strategy. It is well located to the village and the local highway network. The northern part of the site now includes residential development, however the southern extent of the site includes Blakeney Garage. It represents a limited employment opportunity within the village. Furthermore, the site represents one of the few options for employment land.</p> <p><b>Rec : Designate as part Employment Land part Residential Land in the Local Plan</b></p>
<b>Blakeney Land off Westgate Street</b>	1.4	N/A	<b>Low</b>	<b>Medium</b>	<b>Low</b>	<p>The site is situated within Blakeney, a Coastal Service Village within the Core Strategy. It was subject to a residential application that was refused (PF/18/1462); however, this refusal sets out that the principle of residential development on the site is acceptable. Within</p>

Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
						<p>the Officer Report, reference is also made to an earlier Planning Inspectorate Appeal report, which states that the site may not be suitable for employment development and should not, therefore, be retained as such. It is therefore considered that the site should not be retained for employment use within the emerging local plan.</p> <p><b>Rec : Do not designate as Employment Land within the Local Plan</b></p>
<p><b>Catfield Industrial Estate</b></p> <p>EMP 01</p> <p>Designated as Employment Land within the LDF</p>	12.01	<p>HE0008</p> <p>0.47</p> <p>Suitable, Available and achievable</p>	<b>Medium</b>	<b>Medium</b>	<b>Medium</b>	<p>The site is not located in one of the Large or Small Growth Towns, but is well related to the strategic highway network. There is a limited supply of employment land within this part of the District.</p> <p>The site is well located to Catfield. However, this is within the smallest category of settlement within the settlement hierarchy</p> <p>The 2015 Business Growth and Investment Opportunities Study states that the Stalham/Catfield area has a steady long-term</p>

Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
						<p>turnover of space, and this is based on a strong engineering and manufacturing base in the area. The Catfield estate provides a reasonable level of floorspace and currently has the greatest level of vacant stock to meet needs.</p> <p>The Housing and Economic Land Availability Assessment Part 2 states that 0.47 ha of land is available on the site. The study scores the site positively overall stating that it is suitable, available and achievable.</p> <p><b>Rec : Designate as Employment Land in the Local Plan</b></p>
<b>Corpusty (Saxthorpe) Land north of B1149</b>	11.5	N/A	<b>High</b>	<b>Low</b>	<b>Medium</b>	<p>The site is situated within Corpusty &amp; Saxthorpe, which is defined as an infill village within the emerging local plan. The site is occupied by a range of rural employment uses and is also identified within the emerging Corpusty and Saxthorpe Neighbourhood Plan.</p> <p><b>Rec : Designate as Employment Land in the Local Plan in line with the Neighbourhood Plan.</b></p>

Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
<b>Cromer Holt Road Industrial Estate</b>  EMP 03  Designated as Employment Land within the LDF	15.34	HE0025  0.37  Suitable, available and achievable	<b>High</b>	<b>High</b>	<b>High</b>	<p>The site is almost fully developed and makes a substantial contribution to employment needs in Cromer, a Large Growth Town, and due to the lack of significant alternatives and its size is regarded as strategically important.</p> <p>Only a small number of small sites remain. These are not considered suitable for alternative development due to the proximity of adjacent commercial uses. The site is within close proximity to a Large Growth Town.</p> <p>The 2015 Business Growth and Investment Opportunities Study states that the small infill plots could potentially be suitable for small premises. However, the study states that these would be difficult to develop in isolation but may provide opportunities for expansion of neighbouring uses.</p> <p>The Housing and Economic Land Availability Assessment Part 2 states that 0.3 ha of land is available on the site. The study scores the site positively overall, stating that the site is suitable, available and achievable.</p>



Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
						<b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Cromer Retail Park</b> EMP 04 Designated as Employment Land within the LDF	2.95	HE0024 0 Not assessed through the HELAA due to a lack of land remaining.	<b>High</b>	<b>High</b>	<b>High</b>	The site is a large site within one of the Large Growth Towns, meaning the site is of high strategic importance and is within a sustainable location.  Now fully developed as a retail warehouse site this development fulfils identified need for this type of development in Cromer.  <b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Fakenham Industrial Estate</b> EMP 05 Designated as Employment	31.50	HE0041 1 Suitable, available and achievable	<b>High</b>	<b>High</b>	<b>High</b>	The site is well placed to meet the employment needs of Fakenham and the surrounding area and has high strategic importance. The site is also situated within a sustainable location, being within a Large Growth Town.  The site has high occupancy rates, but the HELAA (2015) identified 1 hectare of available land on the site. The study scores the site

Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
Land within the LDF						<p>positively overall, stating that the site is suitable, available and achievable.</p> <p>The 2015 Business Growth and Investment Opportunities Study states that the small infill plots could potentially be suitable for B2 or B8 uses.</p> <p><b>Rec : Designate as Employment Land in the Local Plan</b></p>
<p><b>Fakenham Commerce park</b></p> <p>EMP 06</p> <p>Designated as Employment Land within the LDF</p>	12.14	<p>HE0040</p> <p>0.6</p> <p>Suitable, available and achievable</p>	<b>High</b>	<b>High</b>	<b>High</b>	<p>The site is well placed to meet the employment needs of Fakenham and the surrounding area and has high strategic importance. The site is also situated within a sustainable location, being within a Large Growth Town.</p> <p>The HELAA (2015) states that there is 0.6 ha of available land on the site. The study scores the site positively overall, stating that the site is suitable, available and achievable.</p> <p>The 2015 Business Growth and Investment Opportunities Study states that the remainder of the site is being developed for trade units.</p>

Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
						<b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Fakenham adjacent 30 Holt Road</b>  EMP 07  Allocate as residential development in the LDF	1.02	HE0036  0  Not assessed through the HELAA due to a lack of land remaining.	<b>Medium</b>	<b>Medium</b>	<b>Medium</b>	The site is situated within Fakenham, a Large Growth Town. The site is small and is therefore not considered of high strategic importance. Being situated within Fakenham the site represents a sustainable site.  The site is situated within a location that is likely to be attractive to the market.  <b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Fakenham 66/72 Holt Road</b>  EMP 07  Designated as Employment	1.26	HE0037  0  Not assessed through the HELAA due to a lack of	<b>Low</b>	<b>Medium</b>	<b>Medium</b>	The site is situated within Fakenham, a Large Growth Town. The site is small and is therefore not considered of high strategic importance. Being situated within Fakenham the site represents a sustainable site.  The site is surrounded by residential development on all sides and could potentially represent an opportunity for redevelopment.

Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
Land within the LDF		land remaining.				<p>However, the site supports a number of local small scale businesses and it is therefore important that the site is subject to an employment designation.</p> <p><b>Rec : Designate as Employment Land in the Local Plan</b></p>
<p><b>Fakenham Oxborough Lane</b></p> <p>EMP 08</p> <p>Designated as Employment Land within the LDF</p>	3.63	<p>HE0039</p> <p>1.6</p> <p>Suitable, available and achievable</p>	<b>Medium</b>	<b>Medium</b>	<b>High</b>	<p>The site is situated within Fakenham, a Large Growth Town. The site is small and is therefore not considered of high strategic importance. Being situated within Fakenham the site represents a sustainable site.</p> <p>The HELAA (2015) states that there is 1.6 ha of available land on the site. The study scores the site positively overall, stating that the site is suitable, available and achievable.</p> <p>The site is situated within a location that is likely to be attractive to the market. Due to its relationship with existing commercial uses and poor quality vehicular access are considered to make the site unsuitable for housing.</p>

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						<b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Fakenham Hempton Road</b>  EMP 09  Designated as Employment Land within the LDF	2.25	HE0038  0  Not assessed through the HELAA due to a lack of land remaining.	<b>Medium</b>	<b>Medium</b>	<b>Medium</b>	<p>The site is situated within Fakenham, a Large Growth Town. The site is small and is therefore not considered of high strategic importance. Being situated within Fakenham the site represents a sustainable site.</p> <p>The site is fully developed, and, as such, not assessed through the HELAA.</p> <p>The site is situated within a location that is likely to be attractive to the market.</p> <p>The site is situated within a location that is likely to be attractive to the market. Due to the site being situated within a flood risk zone the site is considered unsuitable for housing.</p> <p><b>Rec : Designate as Employment Land in the Local Plan</b></p>

Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
<b>Holt Hempstead Road Industrial Estate</b>  EMP 10  Designated as Employment Land within the LDF	7.49	HE0060  0.35  Suitable, available and achievable	<b>High</b>	<b>High</b>	<b>Medium</b>	<p>This is the main area of employment development in Holt, a Small Growth Town, and is, therefore, both sustainable and strategic.</p> <p>The HELAA (2015) states that there is 0.35 ha of available land on the site. The study scores the site positively overall, stating that the site is suitable, available and achievable.</p> <p><b>Rec : Designate as Employment Land in the Local Plan</b></p>
<b>Holt Old Station Way (Thaxters)</b>  EMP 11  Designated as Employment Land within the LDF	1.37	HE0052  1.37  Suitable, available and achievable	<b>Medium</b>	<b>Medium</b>	<b>High</b>	<p>The site is located within Holt, a Small Growth Town. Although the site is small its prominent position as a 'gateway' into Holt makes the site score more positively in terms of both strategic importance and market attractiveness.</p> <p>The HELAA (2015) states that there is 1.37 ha of available land on the site. The study scores the site positively overall, stating that the site is suitable, available and achievable.</p> <p>The majority of this available area has been cleared. There may be pressure for residential</p>

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						<p>development to come forward on the site, but it is considered that the employment designation should be retained in order to protect current businesses and to provide ongoing employment opportunities in the town.</p> <p><b>Rec : Designate as Employment Land in the Local Plan</b></p>
<p><b>Hoveton Tunstead Road</b></p> <p>EMP 12</p> <p>Designated as Employment Land within the LDF</p>	7.03	<p>HE0062</p> <p>2</p> <p>Suitable, available and achievable</p>	<b>Medium</b>	<b>Medium</b>	<b>Medium</b>	<p>The site is a relatively large site situated within Hoveton, a Small Growth Town. The site is considered of higher strategic importance due to the lack of alternative sites in the vicinity.</p> <p>The HELAA (2015) states that there is 2 ha of available land on the site. Part of this available land on the northern part of the site is now subject to residential outline planning permission (PO/15/0539). Further analysis of the boundaries of employment areas will be considered within part 2 of the study. Taking the site as a whole, protection should be given for the employment uses on the site through employment land designation in the local plan.</p>

Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
						<b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Hoveton Stalham Road Industrial Estate</b>  EMP 13  Designated as Employment Land within the LDF	2.85	HE0061  0  Not assessed through the HELAA due to a lack of land remaining.	<b>Medium</b>	<b>High</b>	<b>High</b>	The site is a relatively small site situated within Hoveton, a Small Growth Town. The site is considered of higher strategic importance due to the lack of alternative sites in the vicinity.  The site has been fully developed out with low levels of vacancy. The site represents one of the few options for employment land within the area.  <b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Ludham High Street</b>	2.7	N/A	<b>Medium</b>	<b>Medium</b>	<b>Low</b>	The site is situated within Ludham, which is a Service Village within the Core Strategy. The site itself comprises of Ludham Garage. Whilst the site is not a B-Class Use it represents a limited employment opportunity within the village. Furthermore, the site represents one of the few options for employment land.



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						<b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Melton Constable Industrial Estate</b>  EMP 14  Designated as Employment Land within the LDF	7.68	HE0065  0  Not assessed through the HELAA due to a lack of land remaining.	<b>Medium</b>	<b>Medium</b>	<b>High</b>	The site is situated within Melton Constable, a Large Service Village within the Core Strategy. The site is a medium sized employment area providing a wider strategic function. The site has been fully developed out, representing high market demand.  <b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Mundesley Land North of High Street</b>	1.6	N/A	<b>Medium</b>	<b>Medium</b>	<b>Low</b>	The site is situated within Mundesley, which is a Coastal Service Village within the Core Strategy. The site itself comprises of Jen-Bar Garage. Whilst the site is not a B-Class Use it represents a limited employment opportunity within the village. Furthermore, the site represents one of the few options for employment land.  <b>Rec : Designate as Employment Land in the Local Plan</b>

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<b>Mundesley Land South of Cromer Road</b>	1.4	N/A	<b>Medium</b>	<b>Medium</b>	<b>Low</b>	<p>The site is situated within Mundesley, which is a Coastal Service Village within the Core Strategy. The site itself comprises of a Tesco Express and a car sales yard. Whilst the site is not a B-Class Use it represents a limited employment opportunity within the village. Furthermore, the site represents one of the few options for employment land.</p> <p><b>Rec : Designate as Employment Land in the Local Plan</b></p>
<b>North Walsham Industrial Estate</b>  EMP 15  Designated as employment land within the LDF	30.64	HE0085  2.5  Suitable, available and achievable	<b>High</b>	<b>Medium</b>	<b>High</b>	<p>The site represents the largest industrial area within North Walsham, a Large Growth Town. The site is considered to represent a sustainable site due to the proximity of the site to the town. The majority of the site designated within the previous Core Strategy has been largely developed indicating high market demand for employment land in this location.</p> <p>The HELAA (2015) states that there is 5 ha of available land on the site. However, further assessment shows that this is approximately</p>

Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
						now 2.5 ha. The study scores the site positively overall, stating that the site is suitable, available and achievable.  <b>Rec : Designate as Employment Land in the Local Plan</b>
<b>North Walsham Midland Road</b>  EMP 16  Designated as Employment Land within the LDF	2.1	HE0072  0  Not assessed through the HELAA due to a lack of land remaining.	<b>High</b>	<b>High</b>	<b>High</b>	The site is situated within North Walsham, a Large Growth Town, and represents a sustainable and strategic location for employment land.  The site has now been fully built out indicating high market demand.  <b>Rec : Designate as Employment Land in the Local Plan</b>
<b>North Walsham CT Baker Building</b>  EMP 17	0.55	HE0067  0  Not assessed through the	<b>High</b>	<b>Medium</b>	<b>Medium</b>	The site forms part of a larger former employment designation, which was de-allocated and proposed as a mixed use allocation (NW001).

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Designated as Employment Land within the LDF		HELAA due to a lack of land remaining.				<p>The site is situated within North Walsham, a Large Growth Town, and represents a sustainable location.</p> <p>The site is fully developed representing high market demand. Although the site is small in scale, it is considered appropriate to maintain the employment land designation in order to help protect employment opportunities.</p> <p><b>Rec : Designate as Employment Land in the Local Plan</b></p>
<p><b>North Walsham General Trailers Site</b></p> <p>EMP 18</p> <p>Designated as Employment Land within the LDF</p>	10.91	<p>HE0084</p> <p>1</p> <p>Suitable, available and achievable</p>	<b>High</b>	<b>High</b>	<b>High</b>	<p>The site was acquired for redevelopment for employment purposes by the East of England Development Agency (EEDA) in March 2001. The site has been largely built out with Waitrose, Victory Housing and Davenport's Magic Kingdom, leaving only 1 hectare of land to be developed.</p> <p>Part of the site has been developed as retail. The HELAA (2015) states that there is 1 hectare of available land on the site. The study scores</p>

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						<p>the site positively overall, stating that the site is suitable, available and achievable.</p> <p>The site represents an important strategic site within North Walsham. The site forms part of a key gateway to the town and will sit to the north of a large strategic residential allocation to the town. The provision of a link road through this allocation will enhance the strategic location of this site within the town. The remaining available land is therefore important to the longer term employment strategy within North Walsham.</p> <p><b>Rec : Designate as Employment Land in the Local Plan</b></p>
<p><b>North Walsham Travis Perkins Site</b></p> <p>EMP 19</p> <p>Designated as Employment</p>	0.6	<p>HE0068</p> <p>(0 ha remaining – HELAA assessed a larger site and</p>	<b>Medium</b>	<b>High</b>	<b>High</b>	<p>The site is situated within a key gateway location into North Walsham, a Large Growth Town. However, the site is of a smaller in scale than the General Trailers site.</p> <p>The HELAA (2015) states that there is 1.95 ha of available land on the site. However, the site included in the HELAA was larger and forms part</p>

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Land within the LDF		identified 1.95 ha remaining)				of the large mixed use site within North Walsham. The study scores the site positively overall, stating that the site is suitable, available and achievable. The existing employment area should be retained as employment land within the Local Plan.  <b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Roughton</b> <b>Land off Norwich Road</b>	1.3	N/A	<b>Medium</b>	<b>Medium</b>	<b>Low</b>	The site is situated within Roughton, an Infill Village within the Local Plan. This site comprises the Roughton Service Station and associated retail outlet. Whilst this is not a B-Class Use the employment generating function is considered to be important for the vitality and sustainability of the village.  <b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Sheringham</b> <b>Site adjacent to Splash Centre</b>	4.29	HE0098  0	<b>Medium</b>	<b>Low</b>	<b>Medium</b>	The site is situated on the edge of Sheringham, a Small Growth Town within the emerging Local Plan. Although a relatively small site, the site is

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EMP 20  Designated as Employment Land within the LDF		Not assessed through the HELAA due to a lack of land remaining.				considered to be strategic and within a sustainable location.  The site is fully developed and should continue to be designated as employment land.  <b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Southrepps Land off Thorpe Road</b>	5.9	N/A	<b>Low</b>	<b>Low</b>	<b>Low</b>	The site is situated on the edge of Southrepps, which is considered to be open countryside. The site comprises farm buildings and appears to have no business use. The site is considered to be in an unsustainable location and not suitable for designation within the Local Plan.  <b>Rec : Do not designate as Employment Land in the Local Plan</b>
<b>Stalham Nicholson's Yarmouth Road</b>	1.49	HE0108  0  Not assessed	<b>Medium</b>	<b>Medium</b>	<b>Medium</b>	The represents a small site on the edge of Stalham. The site is fully developed and is occupied by an engineering company. As a result, the site should continue to be designated as employment land.

Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
Allocated as Employment Land within the LDF		through the HELAA due to a lack of land remaining.				<b>Rec : Designate as Employment Land in the Local Plan</b>
<b>Stalham Former Bush Abattoir Site</b>  Allocated as Employment Land within the LDF	1.04	HE0113  1.04  Suitable, available and achievable	<b>Low</b>	<b>Medium</b>	<b>Low</b>	The site represents a small site on the edge of Stalham. The site was operational as an abattoir until the 1990's, but has been vacant since 2008.  The site now has planning permission for C3 dwellings and therefore the site should not be allocated for employment use through the local plan.  <b>Rec : Delete Employment Land designation in the Local Plan</b>
<b>Wells Great Eastern Way</b>	3.03	He0120  0  Suitable, Available	<b>Medium</b>	<b>Medium</b>	<b>Medium</b>	The site is located within Wells-next-the-sea, a Small Growth Town within the Local Plan. The site is well located to the town.  The majority of the designated area is situated within a flood risk zone making it unsuitable for



Site Name Site Reference Current Designation	Site Size (ha)	HELAA Reference Land Availability Summary of Assessment	Strategic Importance	Sustainability	Market Attractiveness	Summary & Recommendation
		and Achievable				<p>other land uses. The site currently supports a number of businesses and there is no land available on the site.</p> <p><b>Rec : Designate as Employment Land in the Local Plan.</b></p>