

2017

Borough Council of King's
Lynn & West Norfolk

Planning Policy

[EMPLOYMENT LAND REVIEW – BACKGROUND PAPER]

September 2017

Contents

Introduction	2
Economic vision	3
Local Plan policy regarding employment land	3
Annual monitoring reports BCKLWN	5
Present employment land study (2007) for King's Lynn & West Norfolk.....	6
General justification of additional employment land	6
The current situation	7
Data about the current employment land provision.....	8
Current employment land stock in King's Lynn & West Norfolk	9
Previous employment land allocations (Local Plan 1998)	10
Current employment land allocations	10
Nar Ouse Regeneration Area employment land provisions	12
Current employment floorspace and properties.....	13
Current number of employees and numbers of jobs	15
Achievement of previous targets.....	18
New Anglia LEP targets	18
Core Strategy targets	19
Demand and supply in the long term	20
Forecasts/trends	20
Conclusions	23
References	25

Introduction

The National Planning Policy Framework (NPPF) requires an up-to-date and robust evidence based Local Plan. The NPPF (para 160) states, that local planning authorities should prepare and maintain a robust evidence base to understand existing needs and likely changes in the economic markets in their area. Moreover, they should use this evidence base to assess:

- the needs for land or floorspace for economic development, including the qualitative and quantitative needs for foreseeable types of economic activity over the plan period; and
- the existing and future supply of land available for economic development and its sufficiency and suitability to meet identified needs. (cf. Communities and Local Government, 2012: 39)

The term economic development is defined in the NPPF (Annex 2) as “Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).” (cf. Communities and Local Government, 2012: 51)

An employment land review or also the previous 2007 employment land study, and in this sense also this background paper regarding employment land considers development summed up in the following use classes:

- Business (Class B1)
- General Industrial (Class B2)
- Storage and Distribution (Class B8)

As one can see, retail development/floorspace is not included in this classification, and therefore also not in this paper, but it is noteworthy that an additional background paper has been produced about retail floorspace and the need for additional floorspace in King’s Lynn. The following figure shows the logic of an employment land review and the different parts or stages within this process. This background paper’s structure will also be based on the listed stages.

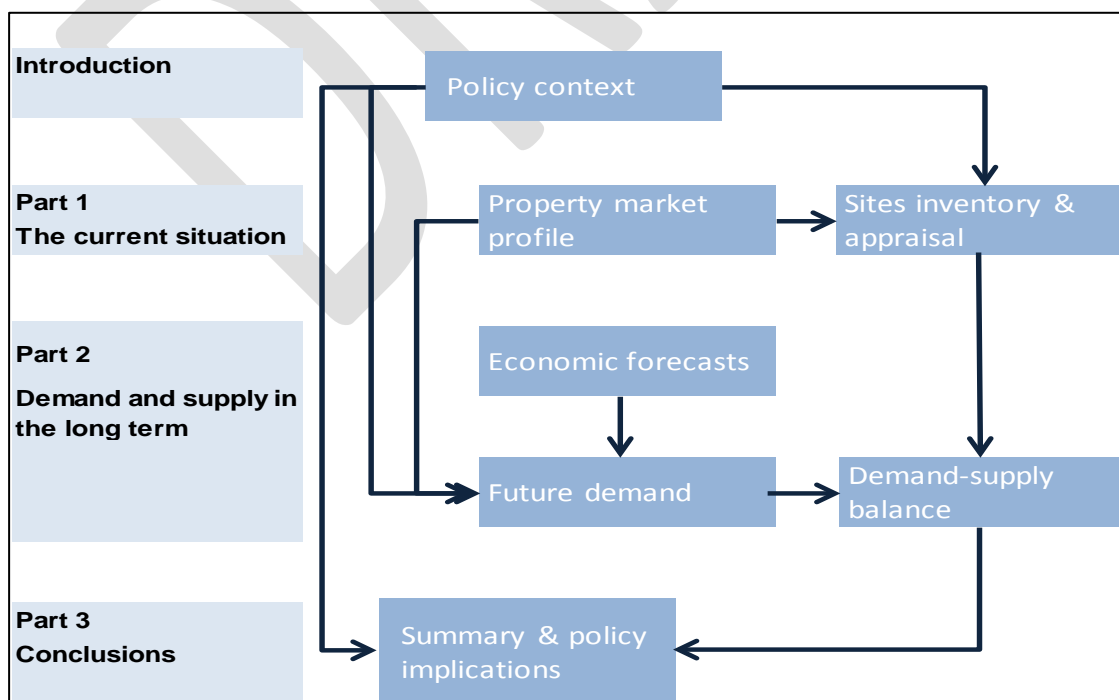


Figure 1: Logic of an employment land review (cf. PAS/PBA/Planning&Development, 2016:15)

In this sense, this background paper seeks to provide an updated position on economic issues in the Borough of King's Lynn and West Norfolk and an evidence base for the development or revision of policies in the Local Plan Review 2017 regarding employment land provision.

Economic vision

As stated in the NPPF, local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.

Within the Borough Council's Core Strategy, which forms part of the current local plan, the following vision is listed:

"West Norfolk enjoys an unparalleled balance between quality of life and quality of opportunity with people drawn to the area to take advantage of this."

Additionally, regarding the economy it is also stated, *"We want to help people of all ages improve their skills and qualifications, and help raise their aspirations. We want to help people become entrepreneurs and benefit from the growing economy. We want to be a place where skilled people want to live and work."*

Since King's Lynn and West Norfolk falls within the Greater Cambridge/Greater Peterborough LEP and New Anglia LEP areas it is advisable to look at the visions of these Local Enterprise Partnerships too:

- New Anglia LEP aims *"to create 95,000 more jobs, 15,000 new businesses and 117,000 more homes by 2026."* Through an unique collaboration of business, education and local authorities they are committed to releasing the region's full economic potential, showing visible local leadership and creating the mobile and accessible world-class economy the area needs to be. (cf. New Anglia LEP, undated: online)
- Greater Cambridge/Greater Peterborough LEP aims to collaborate with businesses, social enterprises, the voluntary sector, and the public sector to deliver sustainable economic growth, create new jobs and achieve further growth in their key industries and support people to gain the skills required by employers. (cf. Greater Cambridge/Greater Peterborough LEP, undated: 5)

Local Plan policy regarding employment land

The current Site Allocations and Development Management Policies Plan and the Core Strategy include policies for:

- **employment opportunities in rural areas** (CS06),
- **small scale employment** (DM 2, DM3 and CS10),
- **large and important employment sites** at RAF Marham and the National Construction College at Bircham Newton (DM14),
- **employment land allocations** in King's Lynn (E1.12), Downham Market (F1.2) and Hunstanton (F2.5).

These employment land allocations include *"about 66 hectares of employment land (...) across the borough"* such as *"two sites (total of 50 ha) in King's Lynn, two in Downham Market (total of about*

16.5 ha) and one in Hunstanton (1 ha)" and have been based on outcomes and assumptions of "The King's Lynn & West Norfolk Employment Land Study" (2007).

Additionally, to the previously mentioned broad overview of employment land related policies, it is necessary to point out the following policies:

- CS01: 75% of employment land will be allocated in King's Lynn and that the Council will "make provision for new jobs within existing and new employment areas and also as part of central area regeneration".
- CS03: "at least 3,000 new jobs in existing and new employment areas" should be provided.
- CS10: delivery of the RSS target of 5,000 additional jobs by 2021 and to increase the proportion of higher skilled jobs.

The 2016 Site Allocations and Development Management Policies Plan (SADMP) replaced the saved policies of the 1998 Local Plan, such as:

- SS10 Provisions of Employment Land:
"Provision is made for some 160 hectares of general employment land distributed mainly at King's Lynn and Downham Market. Employment provision in the rural areas will be promoted where appropriate."
- 5/25 General Employment Sites:
"Provision is made in the Lynn South Expansion Area for employment land for business, general industry and storage and distribution purposes in the following locations shown on the Proposals Map: Saddlebow Estate West (49.9 ha), White House Farm (55.2 ha)"
- 5/32 General Employment Sites King's Lynn East:
"Provision is made in Lynn East for 27.1 ha of employment land for business, general industry and storage and distribution purposes at the Hardwick Estate Extension as shown on the Proposals Map."
- 5/37 General Employment Sites King's Lynn West
"Provision is made in Lynn North for employment land for business, general industry and storage and distribution purposes in the following locations shown on the Proposals Map: Edward Benefer Way (2.3 ha), North Lynn Farm (2.8 ha), Estuary Road (1.6 ha)"
- 6/8 General Employment Sites Downham Market:
"Provision is made for employment land at Riverside, Downham Market for general industry and storage and distribution purposes in the following locations shown on the Proposals Map: Barton's Drove North (6.5 ha), Barton's Drove South (10.3)"
- 7/4 Employment Hunstanton:
"Provision is made in Eastern Hunstanton for 0.6 ha of employment land for general industry and storage and distribution purposes at King's Lynn Road, Hunstanton, as shown on the Proposals Map."

In regard to these previously saved policies it is necessary to point out, that the employment land allocations of the previous Local Plan (1998) have been reviewed and some of the allocations in the latest plan present sites which have been already allocated in the past and partly these sites are already used for employment purposes. Though others have been removed, e.g. since they were not delivered in the past.

Though, it is noteworthy to point out, that the amount of employment land allocations has been reduced rigorously, from 160 to about 66 hectares.

Important information regarding these site allocations and their delivery are provided within the annual Monitoring Reports of the borough council.

Annual monitoring reports BCKLWN

Within these reports monitored information e.g. about the economic profile of the Borough is provided.

Table 1: Economic Profile KLWN (cf. Borough Council of King's Lynn and West Norfolk, 2016b: 8)

Core Output Indicator		10/11 Result	11/12 Result	12/13 Result	13/14 Result	14/15 Result	15/16 Result
BD1 – Total amount of additional (completed) employment floorspace	B1 (sq. m)	4269	5525	5021	10669	2186	2678
	B2 (sq. m)	9963	2159	2231	8820	63800	2938
	B8 (sq. m)	1150	3966	5519	17958	52715	14037
	Total sq.m	15383	11650	12771	37447	118701	19653
BD2 – To show the amount & type of completed employment (B1, B2, B8) floorspace on previously developed land (PDL)	B1 on PDL sq. m	Data unavailable	Data unavailable	4766	536	1738	1981
	B2 on PDL sq. m	Data unavailable	Data unavailable	1616	8500	13021	2092
	B8 on PDL sq. m	Data unavailable	Data unavailable	3924	17328	4483	1627
	Total on PDL sq. m	13003	9786	10306	25202	19242	5700
	Proportion on PDL	85%	84%	81%	67%	16%	29%

Table 2: Employment Land Position 2015/2016 King's Lynn & West Norfolk (cf. Borough Council of King's Lynn and West Norfolk, 2016b: 8)

Employment Land Allocations	Permissions Completed	Permissions under Construction	Land with Permission	Remaining Land with No Permission
2015/2016 Position	320.59 ha	29.89 ha	28.75 ha	130.27

In regards to this monitoring data one can see that the information published in the latest monitoring report, still refers to the allocations of the 1998 local plan, and not to the current numbers/allocations from the SADMP, which has been adopted in September 2016. But, it seems that the employment land stock of King's Lynn and West Norfolk was 320.59 ha at the time this monitoring report was created. However, this number should be considered carefully, in particular because the previous monitoring reports do not include directly comparable information.

Present employment land study (2007) for King's Lynn & West Norfolk

In 2007 an employment land study was produced, which was used as the evidence base for the Core Strategy (2011) and the Site Allocations and Development Management Policies Plan (2016). However, research pointed out that 50% of English local authorities rely on ageing assessments of future employment land requirements, such as employment land evidence produced before the NPPF was published in 2012. (cf. Turley, 2015: 4) In this sense the 10 year old, and therefore pre-NPPF employment land study cannot be seen as adequate evidence base for the local plan review.

Para 158 of the NPPF moreover also points out that the planning authorities "should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area."

One aspect regarding the outcomes of this employment land study is that the provision of higher numbers than the forecasts is necessary and a typical approach to allow choice and variety.

General justification of additional employment land

In general, maintenance of "employment land supply is critical to ensuring that businesses can expand and deliver employment and productivity growth to the UK. However, the way we plan for supply attracts very little attention, compared to the national housing debate." (Turley, 2015: 1)

It is also mentioned, that "[w]ith the UK firmly on an economic growth trajectory and with rising demand for employment land and commercial premises, it is imperative that Local Plans ensure there is a sufficient supply of land" (Turley, 2015: 2).

As pointed out in the last Housing and Economic Land Assessment 2014 (HEELA) "New employment allocations are needed to provide job opportunities for residents in the Borough to support the growth aspirations for the area." In this sense the CS and the SADMP aim to provide a sufficient and flexible supply of employment land, following the distribution of the housing based on the Settlement Hierarchy, during the plan period. (cf. Borough Council of King's Lynn and West Norfolk, 2014: 61)

In this sense, (additional) employment land is required to provide for the creation of new employment and also to allow companies already present to expand their businesses.

However, additional land does not necessary mean development on green fields, brownfields can also be reused/redeveloped, though for developers green field development means the easier and therefore preferred option.

"New employment allocations are needed to provide job opportunities for residents in the Borough to support the growth aspirations for the area." Therefore, the CS and SADMP aim to provide a supply of employment land during the plan period across the borough. However, it is necessary to mention that the distribution of employment land also follows the Settlement Hierarchy, (cf. Borough Council of King's Lynn and West Norfolk, 2014: 61) and due to that a majority of employment land allocations is located within King's Lynn.

The current situation

The following part tries to give a broad overview about the employment situation in King's Lynn & West Norfolk, in regards to employees, properties, and employment floorspace as well as employment land provisions.

Norfolk County Council states, "Norfolk is arguably the most self-contained labour market in the region, in part due to its peripheral/coastal location, but also due to the distance from other regional cities and the limited connectivity of the transport network." (Norfolk County Council, 2012: 2)

Within the following figure, Norfolk County Council pointed out the key employment growth locations within the county.

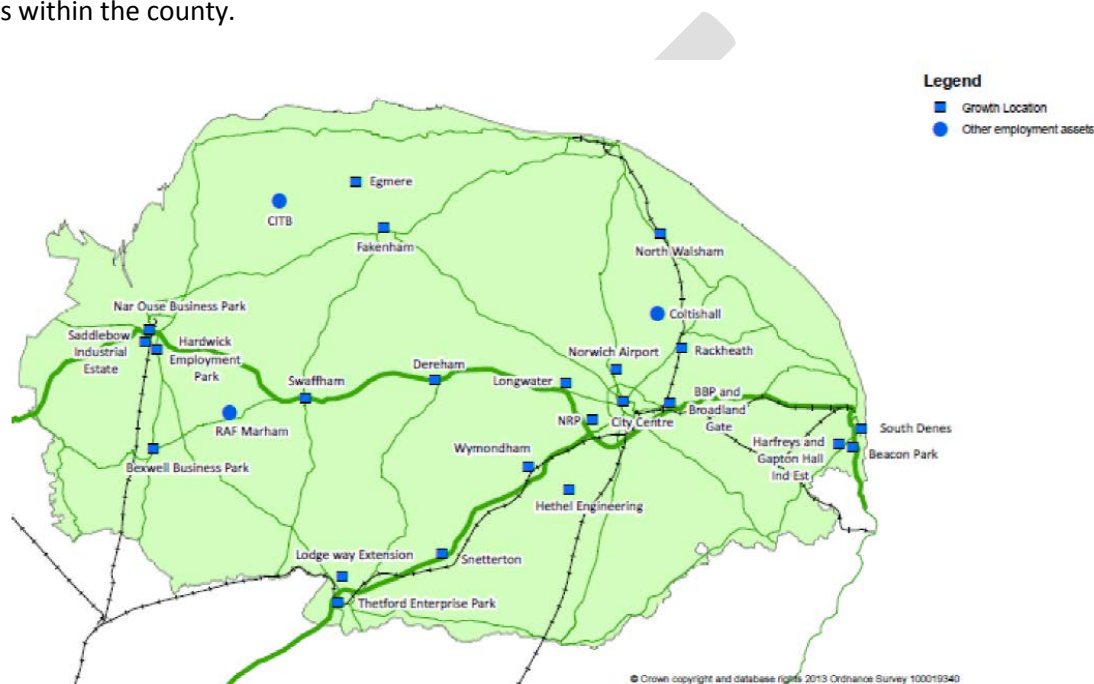


Figure 2: Key employment growth locations (Norfolk County Council, 2016a: 3)

As one can see Saddlebow Industrial Estate, Nar Ouse Business Park, Hardwick Employment Park, Bexwell Business Park are the indicated growth locations within the borough, which are clustered along the important transport routes. Additionally, RAF Marham and the CITB at Bircham Newton are also pointed out as important "other employment assets".

Therefore, one can see that the current employment land allocations follow the baseline policy such as the settlement hierarchy, and that moreover land is allocated across the borough at King's Lynn and the larger towns of Downham Market and Hunstanton. Moreover, policies allowing employment opportunities in rural areas (CS06) or small scale employment outside of these allocations are in place, since it does not really make sense to allocate (smaller) sites in rural areas, since they easily will not match the need or the right location.

In general, "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose." Therefore, these allocations should be regularly reviewed, and if it is unlikely, that a site will be used for the allocated employment use, applications for alternative uses of land or buildings "should be

treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.” (cf. Communities and Local Government, 2012: 7)

The removal of certain allocations and reduction of total employment land allocations with the adoption of the SADMP can be seen as such a review.

Data about the current employment land provision

Within the Core Strategy (Para 7.3.19), it has been stated, that “the Employment Land Study identifies that the key issue is to take steps to assist in the delivery of existing sites so that they are genuinely available and able to come forward for development, particularly in King’s Lynn.” (cf. Borough Council of King's Lynn & West Norfolk, 2011: 42)

However, Norfolk County Council’s “Employment Land Monitoring Report 2016” points out that on the one hand the “employment sites in and around King’s Lynn are some of the largest in the county notably NORA and Saddlebow; however [on the other hand] a significant number of these sites are heavily constrained due to factors such as flood risk and contamination from previous uses.” (Norfolk County Council, 2016a: 14)

Therefore, sites with known constraints or contamination might not be allocated in the first place, or just if it is likely to be able to deal with these constraints or contamination without causing viability problems.

Additionally, it is also noteworthy to mention, that a large amount of available employment land does not have planning permission at the current time, and therefore costs and also time consuming planning applications are involved before employment land can be developed.

Table 3: Employment land availability (in hectares) April 2016 (cf. Norfolk County Council, 2016a: 8, 14 and 16)

	No Permission	Permission	Under Construction	Total
Downham Market	32.6	0.9	0.0	33.5
Hunstanton	0.6	0.0	0.0	0.6
King’s Lynn Urban Area	100.7	28.2	27.8	156.7
King’s Lynn and West Norfolk	130.3	28.8	29.9	189.0
Norfolk	406.0	117.4	39.5	562.9
Norfolk Years Supply	18.3 years	5.3 years	1.8 years	25.5 years

In general it seems as if employment land, without planning permission might be available, and therefore it might be possible that a high number of additional employment land allocations might not be necessary. Though, it is necessary to analyse where this available employment land without planning permission is located, and if it is actually available. Moreover, it is stated, “Norfolk has a good supply of employment land but about 50% of undeveloped land has development constraints. (cf. Norfolk County Council, 2012: 6)

However, it should be noted that these numbers provided by Norfolk County Council are based on the allocations of the previous Local Plan, which have been replaced by the allocations of the 2016 SADMP. The allocations have been reviewed, and in this process, certain locations dropped out, while others have been reduced in size. Therefore, this report from Norfolk County Council cannot be seen as adequate and correct evidence, since it is out of date. Another important aspect is that the delivery, particularly of large employment land allocations can be a process which lasts very long. In this sense the strategy to allocate smaller sites at locations adjacent to existing employment land or at strategic locations might be more successful, than the allocation of huge areas such as the previous White House Farm allocation of the 1998 local plan.

Since the Site Allocations and Development Management Policies Plan was adopted last year, another review of the allocated sites is not very useful, since these allocated sites cannot be delivered in a short time due to access and other reasons, e.g. the size of the allocation. In this sense the existing allocations from the SADMP should be included without an amendment in the Local Plan review.

Current employment land stock in King's Lynn & West Norfolk

In general knowledge about the extent of land within the borough with an employment land use is very limited, due to the lack of maps showing the current land-use, e.g. divided in use classes or overviews such as residential, mixed use and employment land. In this sense it is not possible to present a number based on the extent of land which is currently in "employment use". Due to that the identification of sites particularly suitable for employment land use cannot be identified in a straight forward map based analysis.

Also in the 2007 King's Lynn and West Norfolk Employment Land Study the existing stock only listed employment floorspace, and only referred to employment land in terms of vacant employment allocations. Though, in this study it was stated, that 140 ha of employment land allocations could accommodate about 650,000 sq. m of employment floorspace. **In this sense 1 ha of allocation in average could accommodate ~ 4,640 sq. m of floorspace.** However, this number might be a possible starting point to convert floorspace forecast numbers to employment land needs. (cf. Drivers Jonas, 2007:116)

Previous employment land allocations (Local Plan 1998)

In the last local plan (1998), about 160 ha of employment land has been allocated at 9 sites across the borough.

Table 4: Employment land provisions in the Local Plan 1998 (cf. Borough Council of King's Lynn & West Norfolk, 1998)

	Employment Allocation/Policy	Land	Site size
King's Lynn	5/25 Saddlebow Estate West		49.9 ha
	5/25 White House Farm		55.2 ha
	5/32 Hardwick Estate Extension		27.1 ha
	5/37 Edward Benefer Way		2.3 ha
	5/37 North Lynn Farm		2.8 ha
	5/37 Estuary Road		1.6 ha
Downham Market	6/8 Barton's Drove North		6.5 ha
	6/8 Barton's Drove South		10.3 ha
Hunstanton	7/4 King's Lynn Road Hunstanton		0.6 ha
Total			156 ha

The outcome of allocating these sites has been limited. Therefore, some have been dropped out, while others have been allocated again in the current Site Allocations and Development Management Plan in 2016. Due to this review, e.g. the site at Edward Benefer Way has been lost to residential development.

Current employment land allocations

In contrast to the numbers provided by Norfolk County Council, in their 2016 report, it is relevant to present the actual employment land provisions of the current King's Lynn & West Norfolk Local Plan.

Policy CS10 the Economy sets out the following employment land distribution targets:

Table 5: Core Strategy 2011 employment land distribution targets (cf. Borough Council of King's Lynn & West Norfolk, 2016a: 61)

Area:	Approx. Total land
King's Lynn	50 ha
Downham Market	15 ha
Hunstanton	1 ha
Total:	66 ha

These targets have been addressed in the Site Allocations and Development Management Policies Plan, which includes a total of 68.5 ha of employment land allocations.

Table 6: Employment land provisions in the Site Allocations and Development Management Policies Plan 2016 (cf. Borough Council of King's Lynn & West Norfolk, 2016a)

Employment Land Allocation	Site size
E1.12 King's Lynn	50 ha
F1.2 Downham Market	16.5 ha
F2.5 Hunstanton	1 ha
E2.1 West Winch Growth Area	1 ha
Total:	68.5 ha

In reference to the previous and current allocations, it is noteworthy to point out that the delivery of employment land allocations seem to be a long lasting process, and that the need for additional employment land might be overestimated in the past.

Though, it is noteworthy that some parts of these allocations are already developed or received planning permission. However, in overall at the moment employment land is available in the borough. The table below provides an overview about the current status of the current SADMP allocations.

Table 7: Current status of SADMP employment land allocations (BCKLWN policy team internal calculation)

Allocation	Name	Area	Status	2016-2017
E1.12 - HAR	Hardwick (King's Lynn)	27 ha	Completed Under Construction Permission No Permission	0 ha 0 ha 27 ha 0 ha
E1.12 - SAD	Saddlebow (King's Lynn)	23 ha	Completed Under Construction Permission No Permission	0 ha 0 ha 0 ha 23 ha
F1.2	Land off St John's Way (Downham Market)	17 ha	Completed Under Construction Permission No Permission	1.8 ha 0 ha 0 ha 15.2 ha
F2.5	Land south of Hunstanton Commercial Park (Hunstanton)	1 ha	Completed Under Construction Permission No Permission	0 ha 0 ha 1 ha 0 ha
E2.1	West Winch Growth Area – Employment (West Winch)	1 ha	Completed Under Construction Permission No Permission	0 ha 0 ha 0 ha 1 ha

Therefore, of 68.5 ha, currently just 1.8 ha have been completed, 28 ha have planning permission and 39.2 ha do not have permission yet. In comparison to completions of the previous years, the current available employment land within the SADMP allocations present a supply of employment land for 19.6 years. Therefore, the current allocations could satisfy the need until the end of the plan period of this local plan review (2036).

Nar Ouse Regeneration Area employment land provisions

Additional, to the SADMP allocations the Nar Ouse Regeneration Area (NORA) also provides sites for employment.

Table 8: Employment Land Provision at Nar Ouse Regeneration Area (cf. Borough Council of King's Lynn & West Norfolk, undated)

Employment Land Site at NORA	Site size
E1a	1.1
E1b	2 ha
E2	1.5 ha
E3 (part 1)	3.3 ha
E3 (part 2)	8.5 ha
E4	0.5 ha
E5	1.2 ha
Total	18.1 ha

In regards to the employment land provisions within the Nar Ouse Regeneration area, it is noteworthy to mention that E1a is already in use and houses the King's Lynn Innovation Centre, as well as E5 which houses a pub/restaurant and a hotel, while the rest is not occupied yet but gained outline planning permission. Therefore, about 15.8 ha of employment land seem to be available at NORA. This available employment land at NORA presents an addition to the previously mentioned SADMP allocations, and therefore allow a certain degree of flexibility and site choice for developers.

Current employment floorspace and properties

Due to the lack of information about employment land within the borough, the approach to analyse the current employment floorspace and base the need for additional floorspace on this instead might be more suitable. As a first step the number of businesses and properties will be analysed.

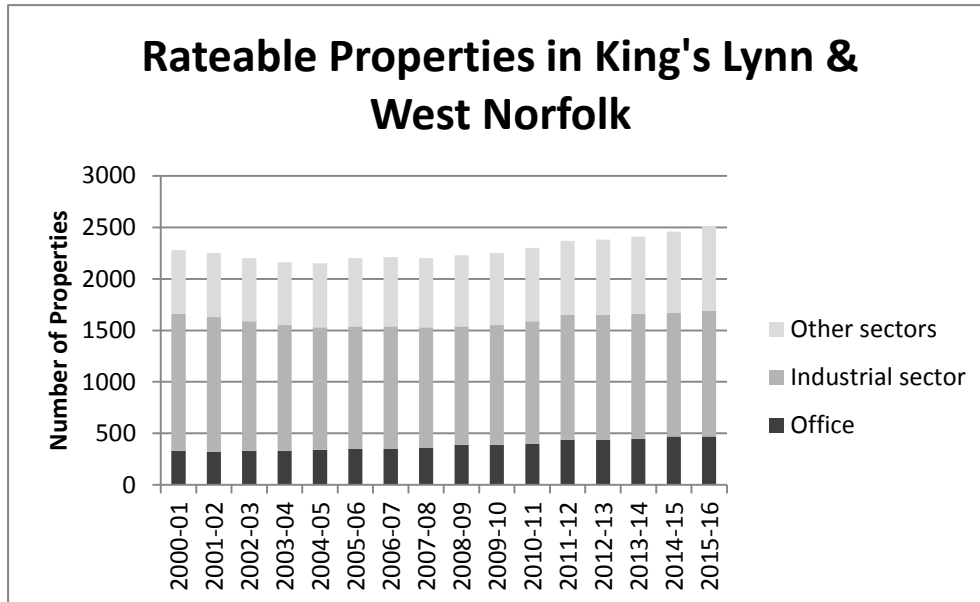


Figure 3: Rateable Properties in King's Lynn & West Norfolk (cf. Valuation Office Agency, 2016a)

As one can see in the figure above, the number of rateable properties (grouped in office, industrial sector and other sectors) is slightly increasing. Moreover, a high share of properties in the industrial sector can be noticed.

In the next figure, the floorspace of these properties is shown.

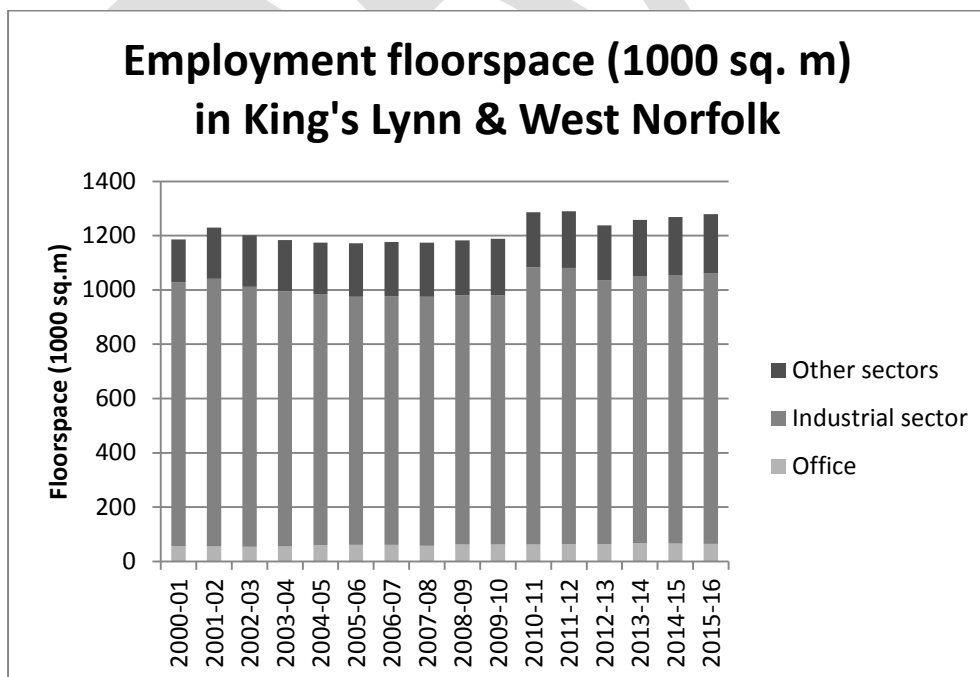


Figure 4: Employment floorspace in King's Lynn & West Norfolk (cf. Valuation Office Agency, 2016b)

As one can see, the number of properties in King's Lynn & West Norfolk has increased since 2011, while the floorspace in general is also increasing after a drop in 2012, but did not reach the peak floorspace accommodated in 2010-2012.

Unfortunately, however the amount of existing employment floor space does not allow a calculation of the current employment land stock, since information about the floorspace does not enable one to calculate the required land to house this floorspace, since it depends on the type of buildings and how buildings are located on a site as well as additional requirements such as parking, manoeuvring areas for lorries, etc.

The 2007 employment land study which pointed out that 1 ha of employment land allocation could accommodate an average of ~ 4,640 sq. m of employment floorspace. If one uses this factor, the total employment floorspace of 2510,000 sq. m of employment floorspace (2016) accommodates 541 ha of employment land. Though, it is unlikely that this number presents a correct figure. However, the number of 320.59 ha (completed permissions) as listed in the 2016 annual monitoring report is much lower.

The number of employees, since the EEFM uses employment densities based on the number of employees might also be a relevant source of information to identify characteristics of companies in King's Lynn & West Norfolk. "In Norfolk 99.7% of local business units employ less than 250 people and 82.8% of these employ less than ten people" In King's Lynn and West Norfolk the following table points out the percentage of businesses by employment size.

Table 9: Percentage of businesses by employment size (2011) (IDBR in Norfolk County Council, 2012: 5)

	0-9 employees	10-49 employees	50-250 employees	250+ employees
King's Lynn and West Norfolk	83.3%	14.2%	2.3%	0.3%
Norfolk	82.8%	14.3%	2.6%	0.3%
East	84.1%	12.8%	2.8%	0.4%
England	83.0%	13.5%	2.9%	0.5%

The assumption that a high number of smaller businesses, which might use smaller sites and have less demand of floorspace can be made, however, one should not forget, that e.g. Warehouses often have a very small number of employees while the floorspace and necessary site size is high, as shown in the table below.

Table 10: Average ratio of sqm/worker for industrial and warehouse space in East of England (cf. ONS, CLG & RTP, 2007 in Roger Tym & Partner, 2010: 5)

	Industrial	Warehouse	WH & Ind
East of England	56.7	88.9	68.5

As a next step the number of employees in the borough will be analysed.

Current number of employees and numbers of jobs

The latest numbers of people in employment (either as employees or self-employed) in King's Lynn, provided by ONS, are from 2016 and are provided within the following table.

Table 11: Comparison of people in employment in King's Lynn & West Norfolk (2011-2016) (cf. ONS, 2017)

	2011	2012	2013	2014	2015	2016
16-64 in employment	65,600	58,900	62,000	63,500	65,000	64,900
16+ in employment	68,300	60,500	64,900	65,800	68,300	67,600

As one can see in the previous table, the numbers of people in employment between 2011 and 2016 varied quite a lot during recent years.

Besides the number of people in employment the number of existing jobs within the borough is also relevant for further analysis if previously set targets are likely to be achieved, review of targets as well as for future forecasts.

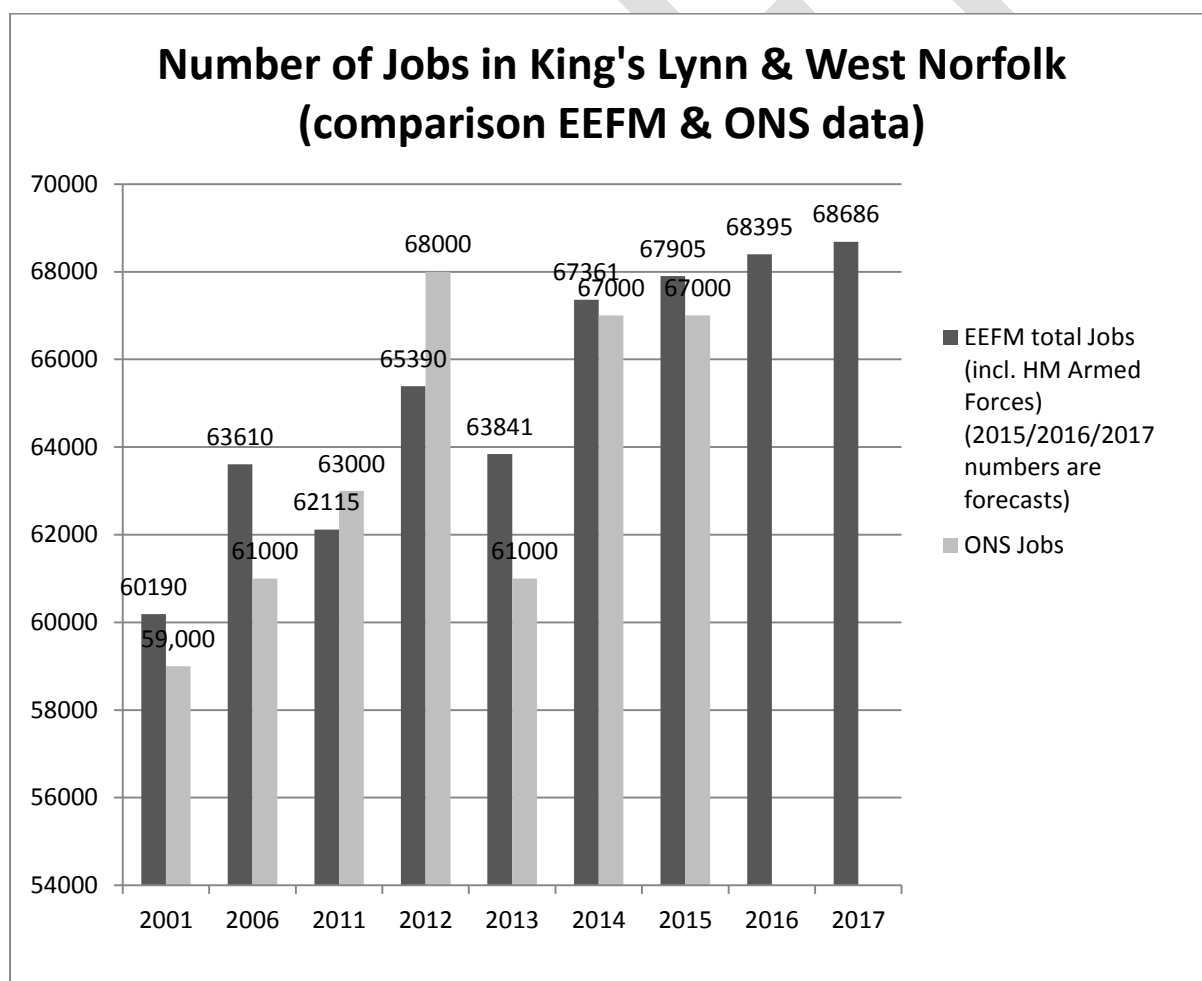


Figure 5: Number of Jobs in King's Lynn and West Norfolk comparison EEFM & ONS data (cf. Cambridge Econometrics, 2016b and ONS, 2017b)

As one can see, the numbers of jobs within the borough vary depending on the source. This might be explained by the fact, that the numbers provided by the EEFM include Armed Forces jobs, but does not explain the higher numbers of ONS compared to EEFM in 2012.. Though, in the year 2014 (the year of EEFM which is an actual figure and not a forecast) the numbers are relatively similar. Therefore, the current job numbers for the borough seem to be around 68,000-69,000.

In the figure on the following page, the fulltime-equivalent (FTE) job numbers in King's Lynn 2011-2017 of the East of England Forecasting model are compared. As one can see the sector share was relatively similar in these years, however the total numbers of jobs change quite significantly. An important aspect of these numbers is that they are used for the land use forecasts of the East of England Forecasting model.

With the EEFM and ONS data about the number of jobs in mind, one can see that the FTE jobs in King's Lynn & West Norfolk are much lower than the total jobs number. This points out that there is a significant number of part time jobs existing. Also the New Anglia LEP lists 34% of part time and temporary jobs compared to 66% full time jobs within the LEP area. (cf. New Anglia LEP, 2017b: 5)

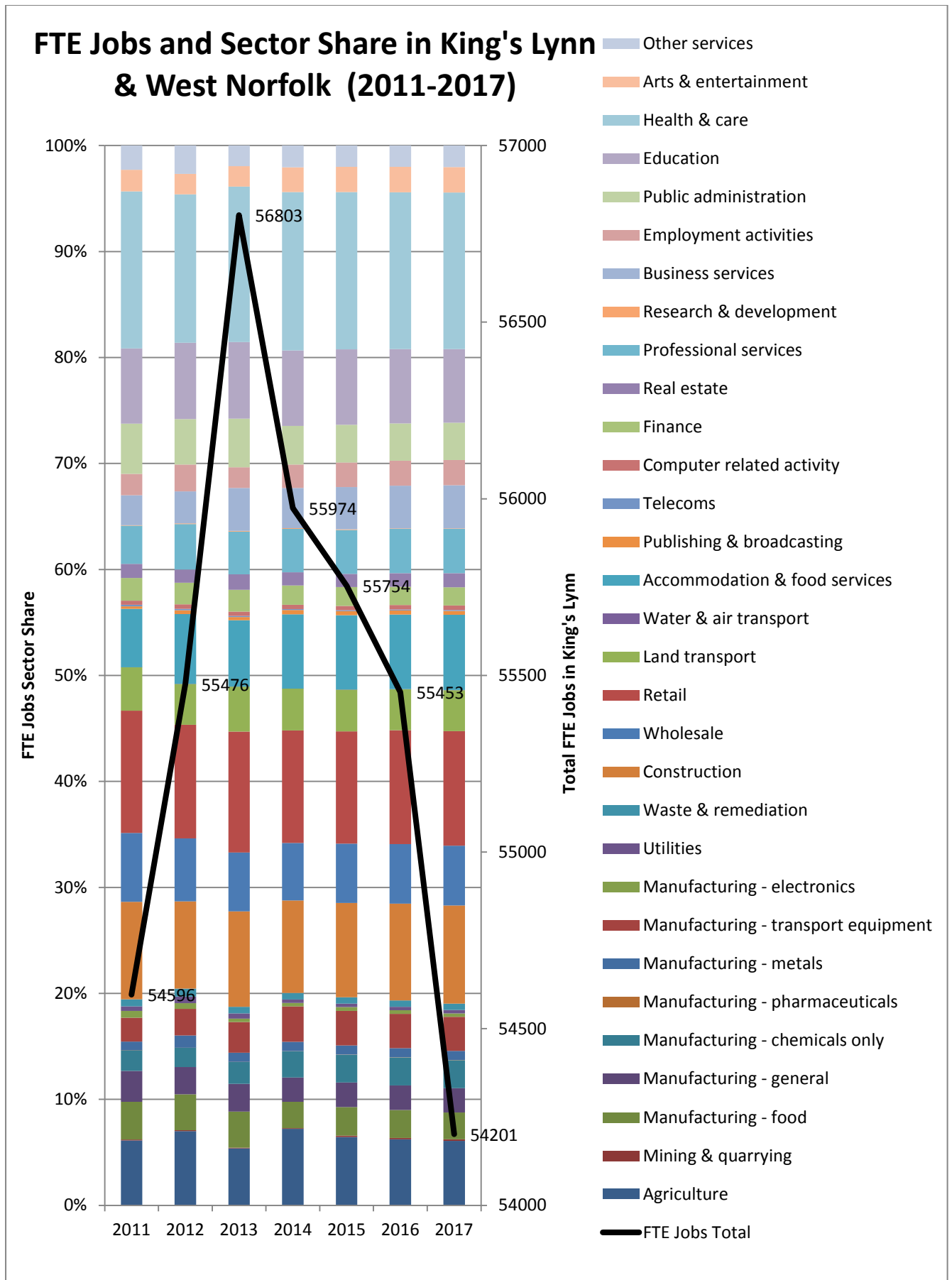


Figure 6: FTE Jobs and Sector Share in King's Lynn 2011-2017 (cf. Cambridge Econometrics, 2016a)

In addition information about the types of jobs within the borough is available within the latest annual monitoring report.

Table 12: Employment share in SOC major groups in King's Lynn & West Norfolk (cf. King's Lynn and West Norfolk, 2016b: 9)

Indicator and Description	2010/2011	2011/2012	2012/2013	2015/2016
Employment in SOC major group 1-3 % of 16+ pop. employed as managers and senior officials; professionals; associate professionals & technical employment	30.8%	33.0%	38.1%	38.6%
Employment in SOC major group 4-5 % of 16+ pop. employed as administrative and secretarial; skilled trades occupations	27.7%	25%	20.8%	21.9%
Employment in SOC major group 6-7 % of 16+ pop. employed as personal service occupations; sales and customer service	14.0%	13.2%	16.9%	18.3%
Employment in SOC major group 8-9 % of 16+ pop. employed as process and plant machine operatives; elementary occupations	27.4%	28.8%	24.7%	21.2%

As pointed out in the table above, it is possible to see that the share of employees in higher qualified roles increased in the last 5 years.

But in the evidence report of New Anglia LEP it is stated, that in “2015 some 3,700 vacancies – or 18.6% of all employer vacancies in Norfolk and Suffolk – went unfilled due to a lack of suitably skilled applicants. This could have cost the local economy an estimated £170 million.” (New Anglia LEP, 2017b: 28) Moreover, local employers stated, that another 7,200 vacancies were named as “hard to fill” due to lack of skills. Therefore, the creation of higher qualified roles is depending on skills as well as how attractive the location is for the needed staff. But compared to other parts of the country it is stated within this report that incidences of skill shortage are much lower in Norfolk and Suffolk. (cf. New Anglia LEP, 2017b: 29)

Achievement of previous targets

New Anglia LEP targets

As mentioned above the New Anglia LEP set targets for the economic development within their area. Of these targets until 2026, the numbers within the following table have been achieved so far. The share of King's Lynn and West Norfolk of the total achievements is also pointed out.

Table 13: New Anglia LEP Target Achievements (cf. New Anglia LEP, 2017a)

	King's Lynn and West Norfolk	New Anglia LEP	KLWN share of LEP total progress
Jobs (2012-15)	2,723	44,957	6.1%
Housing (2012-16)	1,330	18,850	7.1%
Businesses (2012-16)	550	5,715	9.6%

Core Strategy targets

Within CS10 the delivery of the RSS target of 5,000 additional jobs until 2021 and the increase of higher skilled jobs was the aim.

As one can see in the table showing the target achievements of the New Anglia LEP, an additional 2,723 jobs have been created in King's Lynn and West Norfolk until now, therefore the achievement of a total of 5,000 additional jobs in the borough seems likely and possible. Moreover, the data regarding the employment share in SOC major groups also points out an increasing share in Employment in SOC major group 1-3, which includes higher skilled jobs such as: managers and senior officials; professionals; associate professionals and technical employment.

In the Core Strategy from 2011, policy CS10 The Economy aimed to "facilitate job growth in the local economy, delivering the RSS target of 5,000 additional jobs by 2021." This job growth should be achieved "through the provision of employment land as well as policies for tourism, leisure, retail and the rural economy."

An integrated model estimating jobs (labour demand) and the population needed to fill these jobs is the East of England Forecasting Model (EEFM). In this sense it is important that Local Plans "provide enough housing to ensure that the area's economic potential is not stifled by a lack of workers. This, in effect, directs those estimating the 'objectively assessed housing needs' (OAN) of an area to consider whether a demographically-based estimate of housing need would accommodate a sufficiently large resident labour force to support the likely growth in labour demand (the jobs that employers wish to fill)." (cf. McDonald, undated: 1f)

McDonald also points out that the EEFM's output of the working age population (aged 16-64) enables the production of an "estimate number of homes needed to support economic growth by comparing the EEFM working age population estimate with that used to produce the demographic projection-based estimate of housing need." (McDonald, undated: 2) Moreover, McDonald states, that other economic activity rates, e.g. Office for Budget Responsibility, can lead to misleading results. (McDonald, undated: 3) Therefore the EEFM seems to be an appropriate option to be used to estimate a demand for additional employment land in the borough.

The current forecasts for 2021 of the EEFM seem to achieve the goal intended in the 2011 Core Strategy (additional 7,300 jobs compared to 2011), therefore the contents of policy CS10 "The Economy" can be seen as successful and will be able to deal as a base for a review.

Table 14: East of England Forecasting Model: 2016 baseline results (cf. Cambridge Econometrics, 2016b)

	2011	2014	(forecast) 2021	(forecast) 2036
Total population	147900	150000	158700	176100
Working age population	89000	87500	90000	93700
Total employment: jobs	62100	67400	69400	72800

In this sense the forecast **3,400 additional jobs** (of the East of England Forecasting Model) for the plan **period 2021 to 2036** are lower than for the previous plan period.

As another possible outcome, one can see that additional employment land might be required to support the forecast additional jobs until 2036. This might be possible by strategies to reuse vacant employment land/sites besides allocating new sites. E.g. due to structural changes units/sites might become available.

However, within the current forecasts the possible effects of Brexit have not been considered, so it might be that the forecast job growth is not realistic.

Additionally it is also necessary to point out the assumptions for required additional employment floorspace based on the number of new employees are simplified, since shifts within the individual employment sectors also take place.

Demand and supply in the long term

The PPG suggests two possible approaches to assessing the likely change in jobs numbers:

- Past trends
- Economic forecasts

Since Neil McDonald used economic forecasts, in particular the East of England Forecasting Model for his objectively housing needs assessments, etc. it seems appropriate to use this forecasting model to also assess future employment land needs. However, it cannot be seen as ultimate truth. As it is also stated within the technical report of the East of England Forecasting Model, this model is based on observed past trends, the forecasts are unconstrained and subject to margins of error, is not as complex as reality and different forecasting models will not all agree. (cf. Cambridge Economics, 2016: 8f) Though, one has to keep in mind that due to the uncertainties of Brexit, economic forecasts might not be as reliable as in the past, since the possible outcomes/effects of Brexit – positive as well as negative – are very uncertain.

Forecasts/trends

The EEFM estimates for employment land requirements are based on the job-based, workplace-based and full-time equivalents employment forecasts, and are based on the employment densities guide 2010 (cf. Cambridge Economics, 2016: 28).

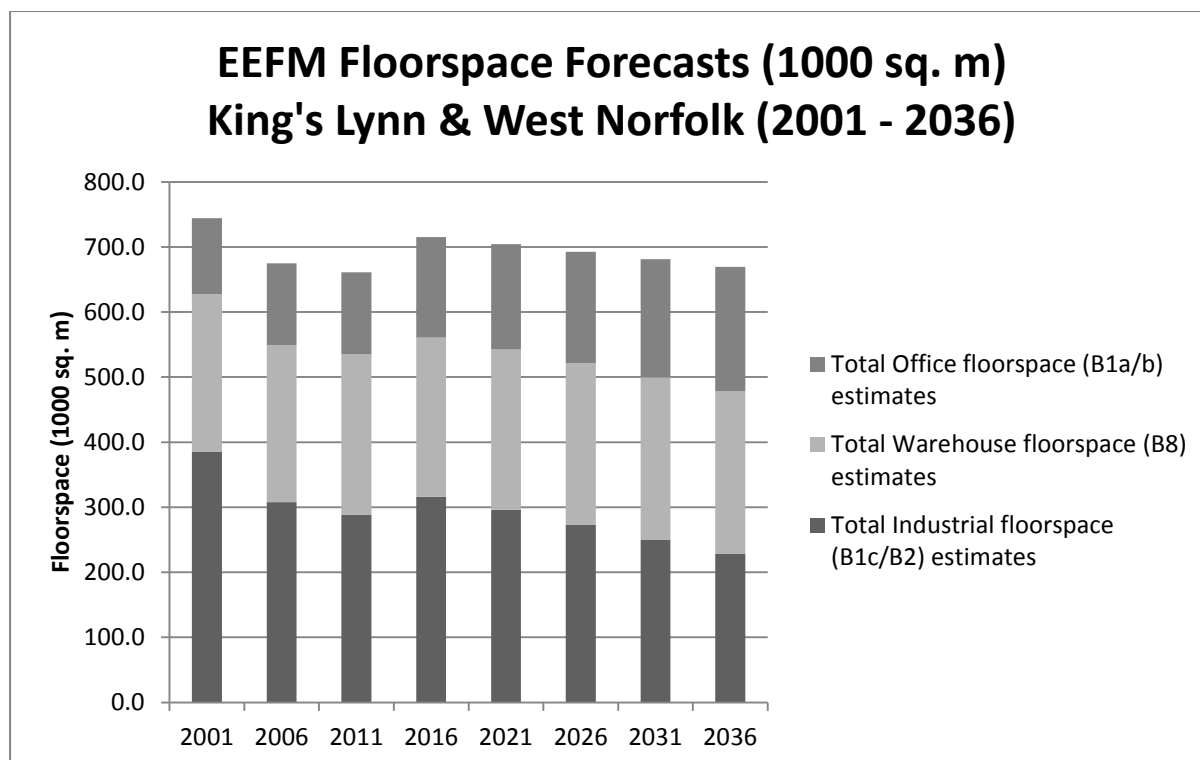


Figure 7: EEFM Floorspace Forecasts (1000 sq. m) KL&WN (cf. Cambridge Econometrics, 2016b)

As one can see within the diagram above, the floorspace estimates of the EEFM forecast a general reduction of floorspace within King's Lynn & West Norfolk until 2036 compared to the current figures, which is particularly based on a reduction of industrial floorspace and an increase of office floorspace as well as a slight increase in warehouse floorspace.

However, if one compares the estimate figures of the EEFM with the floorspace numbers provided by the Valuation Office Agency for the years 2001 to 2016, it is possible to see that these numbers are not coherent, particularly in total floorspace figures. The up and downturns are similar, but the EEFM estimates much lower numbers than the Valuation Office Agency figures present. Partly, the reason for the higher total and industry numbers of the Valuation Office Agency are caused by the fact that EEFM uses warehouses as third sector and the Valuation Office Agency uses "other sectors" which includes a variety of uses, while warehouses are falling into the industry and retail sectors, depending on the type of warehouse. But generally also office floorspace of the Valuation Office Agency is much higher than the EEFM estimates as well as of actual numbers of previous years. In regard to this disparity, on request the Valuation Office Agency provided a table showing the variety of categories which fall within their "other sector" category, such as Ambulance Stations, Animal Boarding, Film & TV Studios, Funeral Parlours, Fire Stations, Laboratories, Recording Studios, and much more, which would not fall within the general definition of office, industry and warehouse, but present a business use. (cf. Valuation Office Agency, 2017)

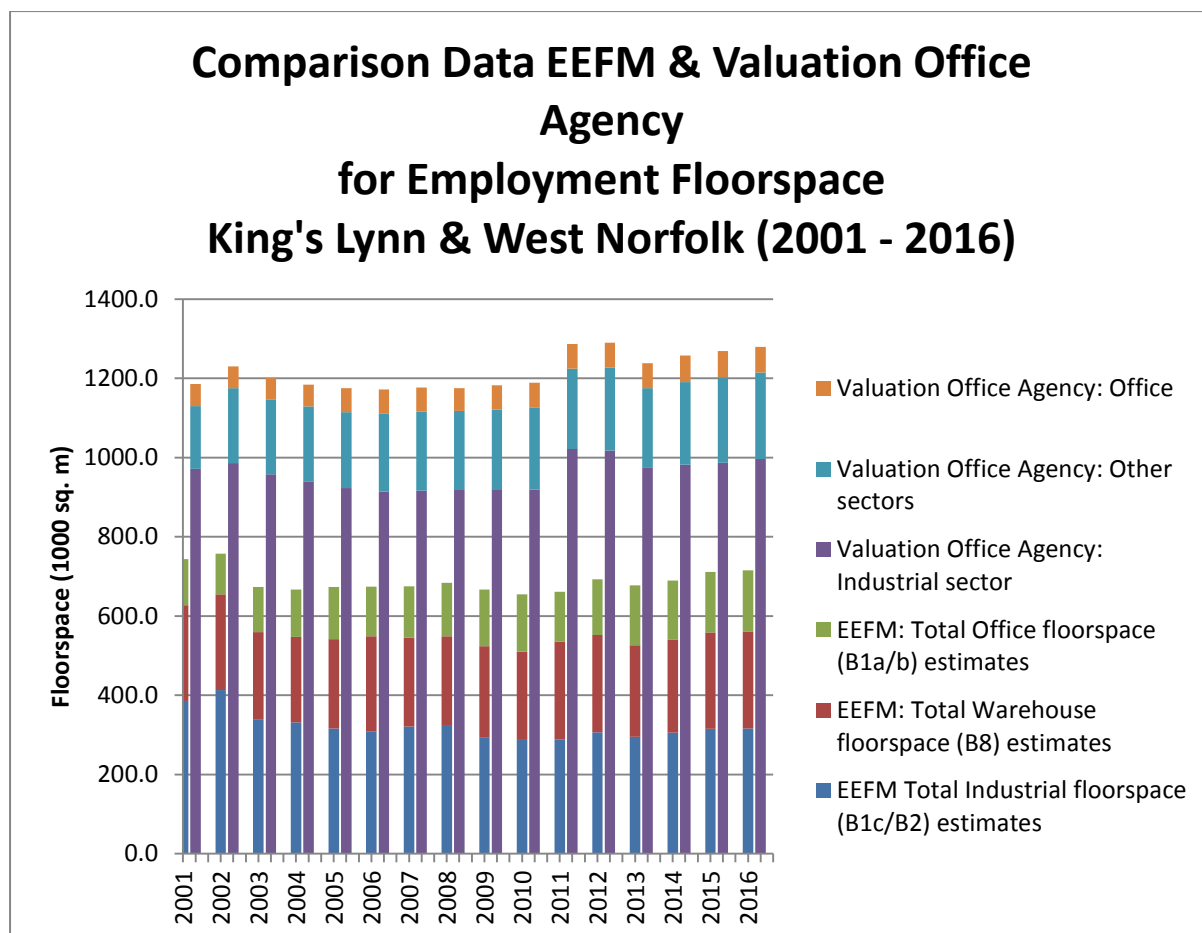


Figure 8: Comparison Data EEFM & Valuation Office Agency for Employment Floorspace KL&WN 2001 - 2016 (cf. Cambridge Econometrics, 2016b and Valuation Office Agency, 2016b)

In this sense, the estimate of the EEFM of a total employment floorspace (office, industry and warehouses) below 700,000 sq. m in King's Lynn and West Norfolk in 2036 might be seen as a realistic assumption, in particular since total employment floorspace (office, industry and warehouses) in King's Lynn & West Norfolk, dropped already below this level in the recent past (EEFM numbers 2003-2014). It is also noteworthy to point out that information about employment floorspace, depending on the source of the information, includes different sectors and might be based on different definitions. It is also possible, that previous employment floorspace as used in the EEFM might be needed/occupied by other uses, which are beyond the strict definition of office, industry and warehouses, but also provides employment (see "other sector" of the valuation office agency).

Though, it is noteworthy to point out that at the moment King's Lynn & West Norfolk has a high share of industrial units and also of industrial floorspace. Though, "demand for industrial floorspace fell dramatically over the period 2001-2014 and this downward trend is predicted to continue to 2045 when the area is expected to be halved compared to the area in 2001". However, an increasing demand in office floorspace can be seen. (cf. Norfolk county council, undated: 7) In this sense due to these (predicted) changes a relatively large amount of employment floorspace either in the form of employment land or units might become available for other uses, such as offices, etc. in the future.

As a result the demand for additional employment land allocations might be low. Therefore, allocating large areas for employment land as in the 1998 Local Plan seems to be unnecessary, in particular to the fact that the current SADMP allocations include available employment land worth 19.6 years of supply. In addition employment land is available at other sites in the borough, such as NORA.

Conclusions

There are certain issues and obstacles existing regarding the evaluation of, if and to what extent, additional employment land is needed, due to a lack of evidence regarding the current stock of employment land. In particular, monitoring of land-uses and up to date land use mapping based on sites on the land registry would be able to support analysis regarding this topic.

However, even with limited information and evidence it is possible to point out certain characteristics of current employment land provision and possible future development and demand in King's Lynn.

- Current targets (CS and also LEP targets) seem to be achieved
- Current Employment land stock in King's Lynn & West Norfolk seems to be about 320.6 ha (2016).
- Slightly increasing number of properties in the Borough
- Increasing number of jobs within the Borough
- Increasing share of higher qualified jobs within the Borough, skill shortage less significant in Norfolk than in other parts of the country
- Reduced need for industrial floorspace in the last few years, trend likely to continue
- Too large and too many employment land allocations in the past, which led to a rigorous reduction of employment land allocations between 1998 Local Plan and 2011 Core Strategy/2016 SADMP
- Currently, (within allocations) employment land without (full) planning permission is available and present a supply worth 19.6 years
- Besides allocations there is additional available employment land (e.g. 15.8 ha at NORA), which is not visualised in the current local plan
- Lack of land use mapping/monitoring of current residential/employment use within the development boundaries
- Difficulties in delivering large employment land allocations in the past
- Loss of potential employment land to residential development, caused by pressure on employment land (allocations) due to housing need/housing crisis
- Structural changes might reduce the need for additional employment land, if vacant sites/units are reused
- Employment can be provided by a variety of uses, which fall beyond office, industry and warehouses as analysed in the EEFM, these "other sectors" might be able to be a substitute for a decrease in other sectors (e.g. industrial), and reuse vacant sites or units, but might also require additional sites

In addition also general issues regarding the provision of employment land have to be taken into account:

- Uncertainty due to effects of Brexit
- Structural changes of employment sectors
- Difficulties in the deliverability of (large) employment allocations
- Infrastructure provision for (large) employment land allocations
- Housing crisis - Demand for residential land/allocations might conflict with the provision of employment land
- Good access by individual motorised transport and public transport in particular should be considered in the choice of employment allocations

Based on these outcomes and characteristics the following actions seem appropriate to deal with employment land provision within the local plan review.

- Large additional employment land allocations seem unnecessary (19,6 years supply and a forecasted reduction in employment land/floorspace demand)
- Additional allocations should present extensions of existing employment land and should be (easily) deliverable, e.g. based on available sites submitted in the Call for Sites 2016 to allow flexibility
- Since an increasing demand for office floorspace is predicted, creation of (high quality) offices, at town centre and other suitable locations should be supported
- Existing, currently not built up land proposed for employment land use, e.g. the land at NORA should be identified in the local plan e.g. by the means of an allocation
- Possibility to achieve benefits due to provision of more employment land allocations than forecasted to allow choice and variety (see employment land study 2007)
- Policies should allow flexibility to deal with uncertainties due to structural changes within employment sectors, unforeseeable effects of Brexit, etc.
- Policies for redevelopment/reuse of unused/vacant sites and units might be needed to react on structural changes, which might reduce the need for additional employment land
- Policies should also target uses beyond office, industry and warehouse uses as used in the EEFM forecasts
- The redevelopment/reuse of vacant sites and units, or brownfields, presents sustainable development and land-use and should therefore be supported/encouraged

As one can see, the provision of employment land within a local plan review can be a quite challenging task. However, the allocations in the current SADMP can be used as a starting point or baseline provision, which might be diversified by allocating some additional sites.

References

- BOROUGH COUNCIL OF KING'S LYNN AND WEST NORFOLK (2016a): Site Allocations and Development Management Policies Plan (SADMP)
- BOROUGH COUNCIL OF KING'S LYNN AND WEST NORFOLK (2016b): Authority Monitoring Report 2014 to 2016
- BOROUGH COUNCIL OF KING'S LYNN AND WEST NORFOLK (2014): Housing and Economic Land Availability Assessment (HEELA) 2014,
- BOROUGH COUNCIL OF KING'S LYNN AND WEST NORFOLK (2011): Core Strategy,
- BOROUGH COUNCIL OF KING'S LYNN AND WEST NORFOLK (1998): Local Plan,
- BOROUGH COUNCIL OF KING'S LYNN AND WEST NORFOLK (undated): Nar Ouse Regeneration Area (NORA) Masterplan,
- CAMBRIDGE ECONOMETRICS (2016a): East of England Forecasting Model: Land Use Module – 2016 baseline results
- CAMBRIDGE ECONOMETRICS (2016b): East of England Forecasting Model: 2016 baseline results
- COMMUNITIES AND LOCAL GOVERNMENT (2012): National Planning Policy Framework
- DRIVERS JONAS (2007): King's Lynn and West Norfolk Employment Land Study
- GREATER CAMBRIDGE GREATER PETERBOROUGH LEP (2014): European Structural & Investment Funds Strategy
- MCDONALD, N. (undated): Using the East of England Forecasting Model (EEFM) to estimate the number of homes needed to support economic growth
- NEW ANGLIA LEP (undated): Our priorities, URL: <http://www.newanglia.co.uk/our-priorities/> [assessed 07/07/2017]
- NEW ANGLIA LEP (2017a): LEP Target Achievement 2017,
- NEW ANGLIA LEP (2017b): DRAFT Economic Strategy Evidence Report,
- NORFOLK COUNTY COUNCIL (2012): Local Economic Assessment for Norfolk, 2012 Update, Norwich.
- NORFOLK COUNTY COUNCIL (2016a): Employment Land Monitoring Report 2016, Norwich.
- NORFOLK COUNTY COUNCIL (2016b): Norfolk Economic Intelligence Report October – December 2016, Norwich.
- ONS (2017a): Annual Population Survey King's Lynn & West Norfolk, provided via NOMIS
- ONS (2017b): Jobs density King's Lynn & West Norfolk, provided via NOMIS
- PAS/PBA/Planning&Development (2016): Economic Development Needs Assessment, presentation
- TURLEY (2015): The land that time forgot Planning for Employment Land
- VALUATION OFFICE AGENCY (2016a): NDR Rateable Properties,
- VALUATION OFFICE AGENCY (2016b): NDR Business floorspace,
- VALUATION OFFICE AGENCY (2017): email response 21/08/2017