

Draft Policy LP09 - Development associated with the National Construction College, Bircham Newton (CITB) and RAF Marham

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542892963547#section-s1542892963547>

Consideration of issues:

The main issues raised are as follows:

- Historic England suggest rewording to modify the reference to ‘enabling development’ as this has a specific meaning. This change is recommended to be accepted.
- The case for the inclusion of British Sugar Wissington in the policy (see also LP06 responses) as a major employment centre in a similar way to RAF Marham and the CITB is recognised. It is recommended that this change should be made for the consistency of treatment of these major employment centres.
- The points around the accommodation impacts and employment numbers at RAF Marham are broadly considered in the Strategic Housing Market Assessment (SHMA). The policy is right to take a positive stance in relation to the development of RAF Marham. The MOD as a statutory consultee has not suggested that we need to amend the policy stance or supporting statement. No change is recommended.
- The appropriate policy response to the closure of the CITB at Bircham Newton is unclear and needs further consideration. In response it is recommended that adjustments need to be made to the policy and supporting text to reflect the desire to see the site continue its role as an important employment centre in the Borough.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend the policy and supporting text to reflect the imminent closure of the National Construction College (CITB) at Bircham Newton by referring to it as the former National Construction College site;**
- 2) Modify the wording of LP09 clause 2 and para. 5.4.7 by deleting ‘enabling’ before ‘development’ and modify LP09 clause 2.b. and para. 5.4.8 (3 references) by deleting ‘enabling’ and replacing with ‘supporting’ before ‘development’.**
- 3) Amend the policy and supporting text to apply this policy approach to the British Sugar Factory, Wissington.**

Policy Recommendation:

Policy LP09 - Development associated with the former National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham

1. The Council strongly supports the roles that the former National Construction College site, Bircham Newton, British Sugar Factory, Wissington and RAF Marham play as local employers and as centres of excellence for construction and advanced engineering respectively.
2. The Council will adopt a positive approach to new development to improve these facilities. Non-operational enabling development which supports the retention, enhancement or expansion of these facilities will be permitted where it can be demonstrated that:
 - a. the development will enhance the facility's long term value to the Borough's economy and employment; and
 - b. there are robust mechanisms to ensure the improvements justifying the supporting enabling development are delivered and sustained; and
 - c. the resulting development will not undermine the spatial strategy set out in Strategic Policy LP01; and
 - d. it will not result in the loss of land needed for operation of the facility, or reduce its reasonably foreseeable potential to expand or be reconfigured.

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Supporting text:

Introduction

5.4.1 The Borough has two three particularly large and important employment sites: RAF Marham and associated facilities; the British Sugar Factory at Wissington and the former National Construction College (CITB) site at Bircham Newton. The Borough Council considers the continued operation and

development of these sites especially important to the economy, and to the scale and balance of employment opportunities in the Borough and beyond and that this warrants explicit policy support for their future adaptation and expansion.

5.4.2 Strategic Policy LP01, 'Spatial Strategy', identifies encouraging economic growth and inward investment as one of the Borough's development priorities. Strategic Policy LP06, 'The Economy', states the local economy will be developed to facilitate job growth, and to increase the proportion of higher skilled jobs. The National Planning Policy Framework (para. 81) states that planning policies should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration".

5.4.3 The RAF base (and associated facilities) at Marham is the largest single employment site in the Borough, supporting over 4,000 jobs, with a wide range of roles, and in particular a strong emphasis on high-end engineering skills. The estimated annual value to the local economy is in excess of £150 million. The base hosts the whole of the RAF strategic strike capability, and this pre-eminence will continue into the future as RAF Marham has been designated the sole operating base for the Lightning II aircraft which has replaced the current Tornado.

5.4.4 The National Construction College employs staff numbers of around 650, as well as generating further indirect employment in the area. It was the leading facility of its type in the UK, the largest in Europe, and performed a key role in supporting the recovery of the UK construction industry through provision of highly specialised technical training. The College trained some 20,000 students and workers per year, and is estimated to contribute £25 million to the local economy. Following its closure as a training site it is important to encourage the continuing use of the site for employment purposes.

British Sugar's diverse operations at Wissington Sugar Factory are of national importance, as it is the largest sugar beet processing factory in the world and one of the four sugar beet factories in the UK. It is a major enterprise in the Borough and the wider region, generating and supporting on site and off site jobs, including sugar beet growers.

5.4.5 The importance of these two establishments has been recognised by the New Anglia Local Economic Partnership (LEP). Together with the establishments' particular characters and stand-alone locations, this justifies their special treatment and support in policy.

5.4.6 Outside the operational base at RAF Marham are extensive residential quarters and associated facilities (and nearby is the original Marham village from which the base takes its name.) The CITB is located on the site of the former RAF Bircham Newton. Many of the buildings from the former RAF base remain in use or in evidence. In both cases the sites are extensive and they, and their surroundings, are largely free of major constraints. There is thus the potential for the consolidation and extension of these establishments and related supporting development.

5.4.7 In order to strengthen these facilities the policy highlights the support given to development for their improvement. It also indicates that a positive approach will be taken to **enabling** development in support of this, provided this is not inconsistent with the Strategic Policies, taken broadly. There will be a need to balance the economic and employment benefits with environmental and other factors, but the Borough Council will be willing to consider some relaxation of the application of policies for the location of, say, housing and new employment uses, provided this does not compromise the settlement strategy taken as a whole, and such a relaxation is justified by the overall benefits and sustainability.

5.4.8 In order to ensure the policy intentions are delivered an application for **enabling supporting** development would be expected to be accompanied by:

- a long term business plan for the facility;
- a financial viability assessment for both the facility and the **enabling supporting** development;
- a proposed mechanism to provide certainty that the intended enhancements to the facility will be delivered in the event the development is permitted.
- an assessment of the proposed **enabling supporting** development in terms of its effect on the settlement hierarchy and the protection of the open countryside rural character of the area within which it is located.

Sustainability Appraisal:

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This policy is judged to have a positive effect. The alternative would be no specific policy, relying on the National Planning Policy Framework and general planning principles, which is considered a 'neutral' option.

LP09: Development associated with the former National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	++	++	+6	0	Likely Positive Effect +6
Draft LP09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	++	++	+6	0	Likely Positive Effect +6
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mr Michael Inder	Object	CITB Bircham Newton is scheduled to close by end of 2019 with relocation to Peterborough as reported in EDP https://www.edp24.co.uk/business/raab-citb-housing-minister-visit-1-5514972	This not only negates sustainable growth in that and the surrounding area but also requires the economic loss of £25m stated in the LDP to be revised throughout in assumptions and plans. Total review with all references to Bircham Newton and CITB to be amended.	Agree – while no comments were received from CITB or its representatives its imminent closure means that adjustments need to be made to the policy and supporting text to reflect the desire to see the site continue its role as an important employment centre in the Borough. Amend policy and supporting text.
Mr Michael Inder	Object	The figures quoted of employees (Servicemen and Civilians) at RAF Marham are no longer accurate and the difference is significant (I know because I was the RAF TG1 Manning WO and had access to the establishment and the figures relating to the drawdown of Tornado personnel and arrival of Lightning personnel). The future growth of Lightning Force personnel between 2018 and 2023 is circa 650 set against the drawdown of the Tornado Force between 2014-19 of circa 1500 personnel. The additional factor is that 42% of the Lightning Force are Royal Navy personnel who as a Service have a far greater proportion of personnel who live in single accommodation through the week and commute home to their permanent family residence at weekends. Furthermore the Service Families Accommodation contract with Annington Property that restricted rental charges is due to end in 2021. The MOD has	Comprehensive engagement with MOD regarding impact of Annington Property contract limitation due to expire in 2021 and the MOD's Future Accommodation Model and how that is likely to influence Servicemen's choice. Also a review of employment figures at RAF Marham for Service and Civilians as the	The housing implications of RAF Marham are broadly considered in the Strategic Housing Market Assessment (SHMA). The policy is right to take a positive stance in relation to the development of RAF Marham. The MOD as a statutory consultee have not suggested that we need to amend the policy stance or supporting statement. No change.

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		reacted to this by introducing a Future Accommodation Model, thinly disguised to be offering Servicemen more choice. The Planners need to gain a full understanding of what effect that will have as whilst it may drive the market to increase housing for servicemen looking for a better value alternative to more expensive Service Accommodation it will inevitably leave potentially hundreds of empty properties right outside RAF Marham and Annington Property are going to want to sell or rent these to someone.	4000 quoted based on legacy is a significant difference to reality as the Lightning Force is not a one for one replacement for Tornado.	
Historic Environment Planning Adviser, East of England Historic England	Object	Object. We suggest avoiding using the term ‘enabling development’ in this context. Enabling development has other definitions and we would generally say that enabling development is development that is contrary to Plan policy and as such has no place in the Plan. We suggest using some alternative wording in this instance. Use wording other than ‘enabling development’.	Use wording other than ‘enabling development’.	Agree - modify wording of 5.4.7 in line with the comment to remove the reference to ‘enabling development’.
British Sugar PLC	Object	In contrast, the adopted Local Plan identifies British Sugar as one of the three significant employers in the borough, alongside RAF Marham and the National Construction College and Bircham Newton (emerging Policy LP09). Whilst these other two employers are recognised through a specific policy to support the role of the employers, there is no such policy for British Sugar/Wissington Sugar Factory within the emerging Local Plan, as drafted. The supporting text of emerging Policy LP09 summarises the importance of both RAF Marham and the National Construction College, as major employers, highlighting at paragraph 5.4.5 that both establishments have been recognised by the New Anglia LEP. The New Anglia LEP also recognises the importance that British Sugar for its contribution towards food production, agriculture and manufacturing. These representations urge the Council to support		Agree - include a specific policy approach for the Wissington Sugar Factory as an addition to Policy LP09.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>British Sugar and recognise the significant contribution that Wissington Sugar Factory makes to the local economy and beyond. Rather than negatively protecting the Factory from development, it should seek to support this ongoing employment use, including the need for efficient production and opportunities for British Sugar to diversity its offer, in order to ensure the longevity of its unique and important operations. Given the historic and ongoing presence of British Sugar operating at Wissington Sugar Factory, we consider that it warrants a site specific policy, similar to LP09, confirming the Local Plan's support of the ongoing and future operation of the Factory and the role British Sugar plays as a significant enterprise in the Borough and the wider region, adopting a positive approach to development relating to British Sugar's business operations. An Employment Land Review (dated 2017) has been undertaken in relation to the Local Plan Review, which seeks to provide an updated position on economic issues in the borough of King's Lynn and West Norfolk and an act as an evidence base for the development or revision of policies in the Local Plan review. There is no reference to Wissington Sugar Factory or British Sugar within the 2017 Employment Land Review, despite detailed information being contained within the 2014 Employment Land Review. We request the Council to update its evidence base to ensure that British Sugar's contribution to the economy is properly reflected.</p> <p>Conclusion</p> <p>British Sugar's diverse operations at Wissington Sugar Factory are of national importance, as it is the largest sugar beet processing factory in the world and one of the four sugar beet factories in the UK. It is a major enterprise in the Borough and the wider region,</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>generating and supporting on site and off site jobs, including sugar beet growers. We request that the Factory's diverse and sustainable operations and its significant contribution to the regional and local economy are recognised and supported by the emerging Local Plan. The recognition of, and support for, the long term operation and future enhancement and operational needs which may arise are in accordance with the provisions of the NPPF. We request that this submission is fully taken into account as part of the current Local Plan review consultation. Should you have any questions or require any additional information however, please do not hesitate to contact Olivia St-Amour on the details below.</p>		