

Land to the west of Tilekiln Green, Stansted Airport Economic Report

Final Report

FKY Ltd

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Executive Summary

This report provides the evidential basis for considering the economic need for - and the economic benefits that would be generated by - an open storage distribution facility at land west to the Tilekiln Green, adjacent to Junction 8 of M11 near Stansted Airport (“the site”). The report is intended to accompany the planning application for the proposed development. The applicant, FKY Limited, is the owner of the site, but the facility will be operated by Wren Kitchens (“Wren”).

Wren currently operates a depot on land north of Stansted Airport (known as ‘North Side’), but the lease expires by 2023 and the new owners of the site do not intend to make the site available for Wren beyond that point. Therefore, Wren has a business need for a new location and has identified the application site that extends to c. 5 ha of which around 3 ha is proposed to be developed.

The operations on-site will include decanting storage containers from larger vehicles onto smaller ones through “*demountable operations*” and fall entirely within the storage and distribution (B8) Use Class.

Policy considerations

Uttlesford withdrew its submitted local plan from examination in April 2020 following initial findings from the examining Inspectors. The Council has embarked on work preparing a new Local Plan that needs to be in place by 2023. Pending this plan, the NPPF provides the central policy considerations in relation to assessing the case for development of the Tilekiln Green site.

Paragraph 82 of the NPPF emphasise how planning decisions should recognise and address the specific locational requirements of storage and distribution, at a variety of scales and in suitably accessible locations.

The Tilekiln Green site was assessed by the SLAA in 2018, which considered the site both achievable and available, but unsuitable as “*development on this site would not contribute to sustainable patterns of development*”. However, this conclusion is superseded by the specific needs of the distribution sector.

The withdrawn local plan is considered to have not satisfied employment growth for the Plan period and over 95% of the identified supply was focused on North Side and Chesterford Research Park, which is not available for open storage and distribution activities such as those proposed by Wren.

Specific locational requirements

The original intention of the operator was to occupy its current facility on the North Side, but the site is not available beyond the current lease expiry of 2023 and wider aspirations of that landowner mean there would be no scope to cater for Wren’s expansion. Therefore, Wren has to relocate urgently.

The operator has specific locational requirements that reflect its business needs, based on operating a manufacturing facility in Barton on Humber, and then delivering to customers in the South of England via a network of distribution facilities. Relevant factors selecting a location therefore include: the driving distance regulations; the role of a Stansted depot as a strategic facility for the emerging southern network of Wren’s depots; serving the catchment area of the Stansted itself; the ability to service deliveries in London with an electric fleet; the labour catchment area; and availability of sites that are accessible and not constrained by Green Belt or national environmental designations. This helps to define the ‘area of search’ that extends along the M11 approximately from Saffron Walden south of Junction 9 to Junction 7 (Harlow Junction) with extensions east and west along the highway network.

Demand and supply position in the area of search

There is an increased demand for transport and storage across the area of search, with an unsatisfied requirement of at least 35ha for distribution purposes (as at November 2020). High levels of accessibility, proximity to London's market and the airport drive demand for strategic distribution with a regional focus.

We have scrutinised suitability and availability of all sites - allocations, planning permissions, and land advertised for commercial purposes - within the area of search. Wren's minimum immediate requirement is 2ha, but its ambitions for growth would require 3ha. A total of 15 sites match the immediate requirement. Input has been secured from Coke Gearing Consulting – a property advisor, active in the local market.

Our analysis reveals significant land supply constraints across the area of search for meeting Wren's immediate requirement. None of the assessed sites is realistically available, principally because consented schemes already have identified occupiers, and the value of use for open storage facilities is lower than that which commercial land owners could secure from modern logistics, meaning landowners are less willing to make their sites available given strong demand levels.

Proposed site and locational advantages

The Tilekiln Green site falls within the area of search and offers a suitable permanent solution for Wren's distribution operations. It has a number of characteristics that contribute towards meeting Wren's business needs:

- 1 **Accessibility:** The site has good quality links to the motorway network, and a nexus between manufacturing operations in Barton on Humber and customers in the south of England .
- 2 **Proximity to the market it serves:** The site is appropriately located in relation to the market it serves and to perform its intended hub role related to other distribution facilities around London once the southern depot network is completed.
- 3 **Suitable size:** The size and layout of the site allow for flexibility in its configuration so that it can accommodate the size and facilities required to serve its market, both immediately (2ha) and for future expansion (3ha).
- 4 **Land availability:** the proposed site is the only option immediately available within the area of search that is able to accommodate Wren's requirements.
- 5 **Labour accessibility:** The site lies at the heart of the current Stansted depot's labour catchment area and relocation will sustain access to employment for existing workers.
- 6 **Neighbouring uses:** The site can be developed without impacting on neighbouring uses, including via mitigation on-site. It is a suitable site for this distribution activities.
- 7 **Policy support:** There is no up-to-date local plan that provides land for business needs, so the site is not allocated for employment. However, it is part of the A120/M11 growth corridor identified as a strategic employment focal point by overarching strategies. The site is not constrained by nationally-significant protections policies and its development would be consistent with policies in the NPPF, including paragraphs 80-82 which require planning decisions to address the specific locational requirements of distribution operations at a variety of scales and in suitably accessible locations.

Economic Benefits

There are economic benefits associated with the proposed development during both the construction and operation phases. In particular, a total of 116 gross direct FTE construction jobs and 129 gross indirect/induced FTE jobs will be created during the construction that will enhance temporary construction employment across the District. In addition, £11.4 million direct GVA and £13.6 million indirect GVA will be generated in Uttlesford and regionally.

Once the facility is operational, a total of 196 FTE jobs will be sustained, comprising the safeguarding of 130 jobs from the current facility that would otherwise be lost, plus 66 extra jobs from the expansion of operations. In addition, there will be 86 indirect and induced FTE jobs across the region, of which 57 FTE jobs will be based in Uttlesford. These should be counted as net additional jobs for the purpose of assessing the benefits of the proposed development because if permission is refused, the existing Wren operations in the area will cease due to expiry of its existing lease at North Side from 2023. All these new jobs will contribute to the District's economic activity and could possibly reduce the JSA claimants in relation to transport and storage sectors by 29%. In addition, the economic output that will be generated is estimated at £12.4 million per annum in Uttlesford and £13.8 million per annum across the East of England. This will enhance further the local economy. It is also estimated that a total of £3.1 million per annum will be generated for National Insurance and PAYE tax purposes.

Conclusions

We have looked at the specific locational requirements of Wren's distribution operations and defined an area of search. Within this area, the only suitable, available and deliverable site that meets Wren's immediate and future growth requirements is the proposed site at west of Tilekiln Green. The need for the site is set within the context of an overall shortfall of employment land in the District and wider area, and a strong demand for logistics space. If the development commences, it will generate additional economic benefits in Uttlesford contributing to the area's economic activity, boosting the local economy with additional indirect jobs and economic output and enhancing public sector revenues.

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1.0 Introduction

- 1.1 This report has been prepared by Nathaniel Lichfield & Partners (“Lichfields”) on behalf of FKY Limited. Its purpose is to consider the economic need for and economic benefits that would be generated by an open storage distribution facility at land west to the Tilekiln Green, adjacent to Junction 8 of M11 near Stansted Airport (“the site”) to accompany the planning application for the proposed development. The site is located within the Uttlesford District Council’s (“UDC”) administrative area. The applicant, FKY Limited, is the owner of the site; however, the distribution facility will be operated by Wren Kitchens (“Wren”, “the operator”).
- 1.2 Wren operates a current depot on land north of Stansted Airport, but this does not meet the operator’s long term requirements, not least because the current temporary lease expires in three years, and long term security of tenure is not being offered by the current landowner. This is not consistent with Wren’s business needs for a regional depot of a scale to meet its growth plans. Wren therefore has a business need for a new location and has identified the application site.
- 1.3 The policies within the National Planning Policy Framework (“NPPF”) - and particularly Paragraph 82 - emphasise the need for planning policies and decisions to *“recognise and address the specific locational requirements of different sectors, including storage and distribution operations, at a variety of scales and in suitably accessible locations”*.
- 1.4 In this context, the scope of the report is:
- 1 to assess the need for storage and distribution uses to be located on the site; it does this by defining the area of search that responds fully to the specific locational distribution requirements of the operator and then reviewing the suitability of the site and overall available supply across the area of search to meet those bespoke distribution requirements. It sets this within the context of the wider supply-demand position on land for logistics in the UDC and wider area; and
 - 2 to assess the economic benefits derived by the proposed development by quantifying impacts of the development during the construction phase and upon completion, together with considering the wider qualitative effects of the role that new development could have in the context of supporting economic growth across the District.

Proposed Development

- 1.5 The site extends to 5.12 hectares (ha) of which some 3.07 ha is proposed to be developed. The remainder which expands around the edges of the developed area, will remain in its current condition, that being predominantly woodland or areas of the open land where significant new tree planting is proposed.
- 1.6 The proposed development involves the creation of an open-land distribution facility which will comprise mainly of an area of hardstanding for heavy goods vehicles (“HGVs”) and urban vehicles (lorries) parking and circulation space. The operations on-site will include decanting storage containers from larger vehicles onto smaller ones through demountable operations. Other on-site facilities will include parking for drivers and porters and probably two small portacabin office facilities. In addition, the proposals involve the formation of a new junction with Dunmow Road. The development will also include landscaping and boundary fencing.

Approach

- 1.7 Having regards to the NPPF and the Planning Practice Guidance for economic needs and land availability assessment¹, we have adopted the following approach in preparing this study:
- 1 Background evidence and policy review – a review of the background evidence and policy framework in relation to the proposals and the employment land issues that are likely to represent key considerations as part of the planning case of the development.
 - 2 Operator’s specific logistic requirements and distribution market – we consider the nature of Wren’s operations and its locational requirements. This involves identifying the operator’s nature and service; identifying the operator’s distribution network; identifying the role of the site in this network; and defining the appropriate area of search where the operator needs to be located within to continue thriving.
 - 3 Logistics demand and supply position – we have assessed the employment land position, solely related to warehousing and distribution (B8 Use Class), within the defined area of search from both a demand and supply perspective and placed this within the context of current and recent commercial property market trends. In addition, we have provided a high-level review of the economic development need and supply position within the District and neighbouring authorities, forming the West Essex and East Hertfordshire’s Functional Economic Market Area (FEMA), based on the latest available evidence. This contextualises the analysis of the site across the wider economic area.
 - 4 Economic benefits assessment - we have assessed the economic benefits associated with the proposed development drawing on the Evaluate methodology developed by Lichfields, which provides an analytical framework for assessing economic impacts arising from new development. For the proposed open-land distribution facility, the scale and type of economic impacts have been determined by the scale of capital investment in the scheme which generates employment and economic output during construction; the additional jobs and economic output that will be created once the development is operational; the scale of financial benefits that would be generated from planning contributions and business rates; and the wider economic impacts associated with the proposed development.

Report Structure

- 1.8 The remainder of the report is structured as follows:
- **Evidence Review (Section 2.0)** – this section summarises all the existing policy evidence in relation to the demand and supply of employment land in Uttlesford, together with the planning history of the site.
 - **Operator’s requirements and market (Section 3.0)** – this section defines the nature of the operator and its relation to storage and distribution uses, the specific locational requirements that the operator has, the definition of the area of search that responds to those requirements and the site’s suitability of these requirements.
 - **Demand and supply position (Section 4.0)** – this section presents the storage and distribution demand and supply position across the area of search and the District together with a high-level analysis of the FEMA’s demand and supply position to put the analysis into a perspective.
 - **Economic Benefits Assessment (Section 5.0)** – this section explores the economic benefits associated with the proposed development by initially reviewing the key

¹ Available at www.gov.uk/guidance/housing-and-economic-development-needs-assessments and www.gov.uk/guidance/housing-and-economic-land-availability-assessment

demographic and economic conditions of the local area; presenting the scheme's economic benefits; and contextualising the findings to the District's baseline.

- **Conclusions (Section 6.0)** – this section summarises the findings and highlights the site's suitability, availability and deliverability for the proposed development and the economic benefits that this could create.

2.0 Evidence Review

- 2.1 This section summarises all the relevant local and strategic policies and evidence base that forms the evidential framework for planning decisions in relation to the proposed development. These include:
- 1 The local policies and evidence, comprising:
 - a The withdrawn Uttlesford Local Plan and identified issues relating to employment demand and supply with emphasis on distribution sector in the [Inspectors' Letter](#) (January 2020) and Local Plan Peer Review (March 2020).
 - b Ensuring Robust Employment Evidence for the Uttlesford Local Plan (September 2018)
 - c Strategic Land Availability Assessment (SLAA) (May 2018)
 - d West Essex and East Hertfordshire Assessment of Employment Needs ([EDNA](#)) (October 2017)
 - e Uttlesford Employment Land Review Update ([ELR](#)) (May 2017)
 - f Property Delivery Advice (June 2016)
 - g Uttlesford Economic Development Strategy and Action Plan 2018-2021
 - 2 Stansted Airport planning evidence, including:
 - a Uttlesford East of England Forecasting Model (EEFM) Stansted Scenarios Workbook (October 2015)
 - b Stansted's Airport Sustainable Development Plan ([2015](#))
 - c Planning History of North Side site
 - 3 Overarching economic strategies, consisting of:
 - a Cambridgeshire and Peterborough Local Industrial Strategy (July 2019)
 - b Emerging Local Industrial Strategy of South East Local Enterprise Partnership

Local policy and evidence

Withdrawn Uttlesford Local Plan and identified issues

- 2.2 The Planning Inspectorate wrote to UDC to inform that the Uttlesford Local Plan was likely to be found unsound in January 2020. The main matter of concern has been the fact that the Plan relies significantly upon the delivery of the three proposed garden communities, namely Easton Park, North Uttlesford and West of Braintree, to deliver the housing requirements of the District.
- 2.3 With regards to employment, the examining Inspectors suggested that the Council had not provided sufficient information with regards to the employment floorspace proposed to be provided within the garden communities and particularly the specific location and time of delivery. The Inspectors proposed that further work should be undertaken in conjunction with the site promoters, to at the very least identify zones within the garden communities where the various employment uses will be located, together with information regarding what stage they will be completed and how they will be delivered.
- 2.4 The Draft Plan stated (paragraphs 5.21 to 5.25, p24-5) that there is a gross employment requirement of 120,000m² of office floorspace and 90.7 hectares of industrial land including

both manufacturing and warehousing for the 2016-33 period. The plan clearly argued (in justification paragraphs 5.23 and 5.24) that the industrial requirements are driven by the need in warehousing and distribution uses rather than manufacturing, which is forecast to decrease (in line to national trends). The Plan estimated a net additional requirement of 21,000m² of office floorspace and 10.2 ha of industrial land for the 2016-33 period.

- 2.5 In terms of the supply position to fulfil those requirements, the plan listed a total of 23,900m² completed floorspace between 2011-16, 49,000m² from extant permissions, together with undefined employment space within the garden communities, 55ha in London Stansted Airport (North Side allocation) and the 29.4ha R&D development of the Chesterford Research Park, which according to justification paragraph 5.42 is expected to be delivered in 12-15 years.
- 2.6 The Council, therefore, has not provided robust evidence that the employment requirements across the plan period to 2033 will be satisfied during the Plan period, as the employment allocations lack of evidence suggesting deliverability on time.
- 2.7 It should be noted that a large portion of the site (3.37 ha out of 5ha) was unsuccessfully submitted for consideration as an employment land allocation in the Draft Plan (withdrawn) (site ref. 07GtHal16). The Strategic Land Availability Assessment (SLAA) (2018) concluded that the site was unsuitable for allocation as it “*would not contribute to sustainable patterns of development*”. The justification for this conclusion was not explained further, although the policy constraints section of the analysis included the recognition that the site is “*beyond Adopted Development Limits*”.
- 2.8 We consider that the provision of land for strategic warehousing and distribution uses should be approached under a suitable set of criteria that reflect the specific locational needs of this type of employment land in accordance to NPPF.
- 2.9 In this case, the provision of a strategic distribution site adjacent to existing built development with high access (as it is adjacent to a motorway junction) and within a corridor identified by the commercial market and overarching strategies as a growth corridor for strategic distribution uses (see paragraphs 2.27-2.32 and 2.50-2.56) should not be considered as “*contributing to unsustainable patterns of development*”, a judgement in the SLAA that does not appear to be supported by the NPPF.

Strategic Land Availability Assessment

- 2.10 The Council held a Call for Sites exercise between April 2015 and July 2015. This provided an early opportunity for developers, landowners and site promoters to suggest sites within Uttlesford for residential and employment development. The SLAA informed the Local Plan process and indicated which sites should be allocated in the Local Plan.
- 2.11 Since the Call for Sites exercise and publication of the 2015 SHMA, 34 additional sites have been submitted for consideration either through the Call for Sites process or through representations to the Regulation 18 Local Plan 2017.
- 2.12 As part of this exercise, the proposed site was submitted for consideration to provide 3.4ha of employment land (SLAA Reference:07GtHal16). According to SLAA evidence, the site was considered both achievable and available but unsuitable as “*development on this site would not contribute to sustainable patterns of development*”.
- 2.13 As a result, the site was classified within the category E that included sites “*which are not considered developable and delivery is not considered suitable within 15 years for one or more of the following reasons:*
- *Departure from National Policy leading to development in unsustainable locations.*

- *Development being of a vastly disproportionate scale to the adjacent settlement.*
- *Sites contrary to the development strategy of concentrating development in Garden Communities which are of a scale to be self-contained and provide a secondary school.*
- *Sites in Type B villages where development would not contribute to sustainable patterns of development.*
- *Sites which contribute to the purposes of the Green Belt or Countryside protection Zone as identified in the Green Belt Review (2016) and the Countryside Protection Zone (CPZ) Review (2016).*
- *Sites with insurmountable physical constraints such as flood risk, noise pollution”.*

2.14 It is understood that the site was not considered suitable mainly due to the CPZ designation. Therefore we have also reviewed the 2016 CPZ study to understand the contribution of the site in the Countryside Protection Zone.

2.15 The purpose of the CPZ that expands around the Stansted Airport was set out in Policy S8 of the Local Plan adopted in 2005. The CPZ aims to limit the physical size of the airport and to maintain an area of open countryside around the airport, reinforcing normal planning controls on development in the countryside.

2.16 The site falls within parcel CPZ 1 and scored ‘medium’ across the three first purposes of the CPZ, including to protect the open characteristics; to restrict the spread of development from the airport; and to protect the rural character of the countryside around the airport. The site scored ‘low’ across the fourth purpose of preventing changes to the rural settlement pattern of the area by restricting coalescence. The overall score of the site was moderate, indicating moderate significance to contribute to the purposes of CPZ.

Ensuring robust employment evidence for the Uttlesford Local Plan

2.17 The Council instructed the ELR consultants to undertake an update with the purpose of having robust employment land evidence in place to inform the Local Plan in September 2018. In particular, this study provided a critical review of the Regulation 19 Local Plan and other relevant documentation and identified any additional work required to ensure a sound evidence base with regard to employment; and provided an indicative forecast of the amount of employment land to be included within the three proposed garden communities.

2.18 The report recommended that the (subsequently withdrawn) Reg. 19 Draft Local Plan provide clarity on the requirement for employment land across the District and how it would be met.

2.19 The report also noted that the 2017 ELR was likely to have underestimated the level of need for employment land, due to the following issues with the adopted approach:

- 1 The ELR focused on net floorspace changes alone and does not take account of gains and losses, which indicate a “muted” level of activity;
- 2 The ELR did not consider the need to replace lost stock (i.e. associated with Permitted Development Rights); and,
- 3 There was no detailed consideration of labour supply and past development trends.

2.20 Notwithstanding these concerns, the report stated that, compared to the overall assessment of required employment land in both EDNA and ELR, the Reg. 19 Draft Local Plan contained a substantial over provision in quantitative terms. However, it noted that this was largely a result of large allocations at North Stansted and Chesterford Research Park – allocations which may

have been intended to provide for long term needs beyond the Plan period – but this was not clearly explained in the Draft Plan.

West Essex and East Hertfordshire assessment of employment needs

- 2.21 This study (published in October 2017) provides a needs assessment for the West Essex and East Hertfordshire FEMA and its constituent local authorities, taking as its starting point the East of England Forecasting Model (EEFM) (2016), published by Cambridge Econometrics. This labour demand-based assessment reviewed the 2016 EEFM forecast and created a moderated baseline scenario, taking into account the spatial distribution of growth in the previous EEFM (2014) forecasts and other assumptions in relation to sectoral performance. We note that these forecasts are now very dated and should not be relied upon as the sole basis for the assessment of employment land needs in Uttlesford.
- 2.22 The assessment calculated the resulting land requirements for each local authority area, having regard to supply, economic strategy, historic take-up and market demand. In Uttlesford, the assessment took into account the planned growth of Stansted Airport, creating an additional 6,750 jobs in the area above the moderated baseline.
- 2.23 The Preferred Scenario indicated growth of 16,000 jobs in Uttlesford between 2016 and 2033. This figure was below by 2,100 jobs required to “*balance the labour supply*” across the FEMA; however, the assessment concluded that additional provision could be accommodated through increased job densities and/or windfall development.
- 2.24 Under the Preferred Scenario, the assessment indicated a need for 22ha of industrial land in Uttlesford between 2016 and 2033, to include the former B1c, B2 and B8 Classes. A detailed analysis of demand-supply position for distribution uses (B8 Use Class) is presented in Section 4.0.

Employment land review update

- 2.25 The Uttlesford District ELR Update (May 2017) identified a need for 10.2ha of land for industrial uses over the Plan period to 2033. That represented a “*medium*” growth labour demand scenario, based on the 2014 EEFM, which was superseded by the 2016 EEFM forecast considered by the West Essex and East Hertfordshire Assessment of Employment Needs (October 2017) as discussed above.
- 2.26 The ELR noted that vacancy rates were below the optimum level to allow efficient transition between occupiers and, therefore, it was recommended that the Council should identify opportunities to release poor-performing, older industrial stock and bring forward new industrial land to meet the needs of future occupiers. This would then allow for additional industrial land to be brought forward.

Property delivery advice

- 2.27 The Property Delivery Advice report (June 2016) reviewed the commercial property market in Uttlesford. The research concluded that the southern part of the District had a “*reasonable range of development options in the pipeline*”. However, it only reviewed the development pipeline in relation to employment sites with buildings and did not address the need for open employment land for B8 use.
- 2.28 At the time of the report, a total of 109,922 m² of B2 and B8 (combined) floorspace was either committed or in the development pipeline in the District, 84% of which was based at Stansted Airport and the surrounding area. However, this supply included premises for use by

proponents as well as those available to the market. The report did not give an indication of the amount of B8 land that was available for occupation in the Stansted area.

2.29 The report demonstrated that there was clear developer interest in the areas around Stansted Airport and the A120 corridor, highlighting the commerciality and attractiveness of this area against the rest of the market in Uttlesford.

2.30 Self-evidently, having dated from June 2016, this report is now out of date.

Uttlesford Economic Development Strategy and Action Plan 2018-2021

2.31 The Uttlesford Economic Development Strategy and Action Plan 2018-21 sets out the Council's priorities to support sustainable business growth. This Strategy references the findings of the Essex Economic Commission, which identified certain "*opportunity sectors*", including the logistics sector in connection with London Stansted Airport.

2.32 The Strategy also provides support for a number of transport priorities in the District, including major scheme improvements to Junction 8 of the M11 to "*support strategic development in Uttlesford and neighbouring districts beyond 2033*".

Stansted airport

Uttlesford East of England Forecasting Model (EEFM) Stansted scenarios workbook

2.33 Although this briefing paper is somehow dated, it still provides evidence of increased employment requirement under the Stansted Growth Scenario. As part of this analysis an adjusted EEFM (2014) scenario, taking account of Stansted growth. This scenario, based on 1,895 jobs per annum (jpa) across the strategic housing market area, has been adopted as the basis for the analysis in this report. This is an increase from the EEFM baseline of 1,590 jpa.

2.34 In this context, the jobs forecast between 2011 and 2033 doubled for Uttlesford from 7,080 jobs or 320 jpa to 14,815 jobs or 675 jpa across the period to 2033, reflecting the growth ambitions of Stansted Airport with impacts mainly being concentrated in Uttlesford.

2.35 To put in context, this figure appears higher than the figure of 6,175 jobs (by 560 jobs) that was applied for the Stansted growth scenario in the ELR 2017 and the resulting employment requirement proposed in the Local Plan (withdrawn).

Stansted airport sustainable development plan

2.36 Manchester Airports Group (MAG) set out its vision and strategy for Stansted Airport growth in the Stansted Airport Sustainable Development Plan (SDP) (2015).

2.37 The existing Wren Kitchens depot falls within the area identified as "*North Side*" in the SDP, which is an area of 55ha that was historically the main facility at the airport (Figure 2.1). This now contains substantial areas for aircraft parking and manoeuvring, the airport's fuel farm and general aviation facilities for fixed based operators (FBOs) (providing private and executive travel). The wider North Side area also includes the airport's main long stay car park and the Hilton Hotel.

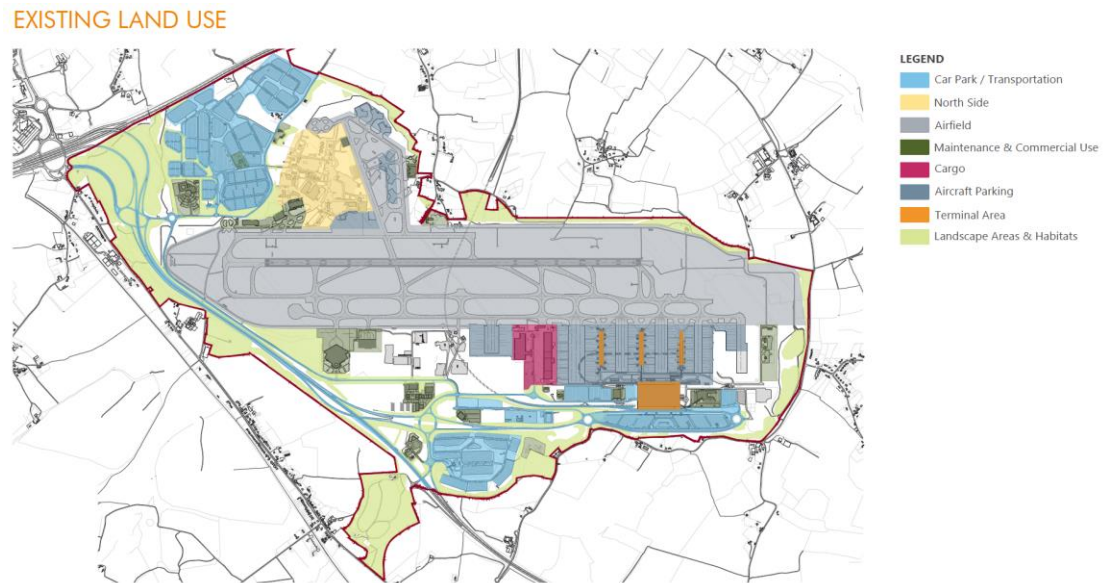
2.38 The fact that the historic road network and the old and in poor condition buildings within the area limit the efficient use of land and makes the site as the best candidate for redevelopment.

2.39 In Policy SMP9 of the 2005 Local Plan, 18 hectares of land at North Side was allocated for general employment uses comprising offices and non-strategic warehousing, freeing the land

from long-standing ‘airport-related uses’ restriction. This was also proposed within the 2014 emerging local plan that was eventually withdrawn (in 2014). Despite the plan being withdrawn, the Inspector concluded that provision of general employment on this site as part of the District’s land supply was a sound approach.

- 2.40 The SDP states that MAG will continue to support the retention and operation of FBOs at the site and to have land available if additional hangars are required. As of 2015, there were five FBOs operating from the site.

Figure 2.1 London Stansted existing land use plan (2015)



Source: Manchester Airports Group Stansted Airport Development Plan (2015)

- 2.41 The SDP provides support for other sectors in the North Side area, including hotels, food and beverage, petrol station and offices to accommodate airport-related companies. It also states that in longer term employee car parking may be relocated in the site. There is no specific support for other uses.

Planning History of North Side

- 2.42 Following the publication of the Airport’s SPD, MAG submitted a scoping opinion request in December 2016 with regards to the site’s development (UTT/16/3601/SO), including:

“Redevelopment of land northwest of the runway (North Side Site) for uses comprising storage and distribution (B8), logistics and commercial space (B1/B2). Revised site access and internal road layout”.

- 2.43 It was stated in the scoping request that the area consists of 55ha of which 43ha is proposed development split into two distinct parcels of land of 17ha and 26ha. *“Built form being developed but expect between 10 and 20 units with proposed heights up to 25m. No further application was submitted with regards to the site”.*

- 2.44 As a result, among the 55ha only 43ha would be actually considered for commercial development and it is likely to provide up to 20 B1/B2/B8 Units of undefined size; however, it is expected to be of large scale. The average size based on a plot ratio of 0.4 could be estimated to 8,500m² (c.90,000ft²), which is a size serving the medium box logistics market or large industrial requirements. The proposed height of up to 25m which equates to over six floors,

indicates that potentially office centres were also included within the proposals. In any case the scoping request was referring to an open B Use Class development of 43ha area.

- 2.45 In January 2017 the Council provided a scoping opinion response that focused mainly on addressing the ecological issues around the site.
- 2.46 In June 2017, an EIA scoping opinion request was received in relation to the airport's entire boundary for proposed increase in annual number of passengers to 44.5mppa and a corresponding increase of 11,000 annual aircraft movements with associated construction within the airport boundary, including two new links to the runway together with nine additional aircraft stands (UTT/17/1640/SO).
- 2.47 This was followed by a planning submission in February 2018 for infrastructure works within the existing runway to increase passenger capacity. In particular, the proposal includes:
“Airfield (infrastructure) works comprising two new taxiway links to the existing runway (a Rapid Access Taxiway and a Rapid Exit Taxiway), six additional remote aircraft stands (adjacent Yankee taxiway); and three additional aircraft stands (extension of the Echo Apron) to enable combined airfield operations of 274,000 aircraft movements (of which not more than 16,000 movements would be Cargo Air Transport Movements (CATM)) and a throughput of 43 million terminal passengers, in a 12-month calendar period”.
- 2.48 A refusal was issued in January 2020 and an Appeal has since been lodged and will be considered at an inquiry in January 2021.
- 2.49 It should be noted that the above application does not make any reference to the North Side site. Therefore, since January 2017, there has been no evidence supporting the delivery of the SPD's proposals for employment provision of 43ha in the North Side.

Overarching Strategies

- 2.50 Uttlesford District falls within both the Greater Cambridge Greater Peterborough (GCGP) and the South East Local Enterprise Partnerships.
- 2.51 The GCGP Enterprise Partnership Strategic Economic Plan (SEP) (2014) highlights the diverse economy in the LEP area, including the valuable role of the logistics sector.
- 2.52 The Cambridgeshire and Peterborough Local Industrial Strategy (LIS) (July 2019) sets out how the area will support its economy and boost productivity. The LIS identifies a number of sectoral strengths and specialisms in the area, together with supporting sectors that also provide opportunities to create business growth and increase the sustainability of the local economy.
- 2.53 The logistics sector is recognised as one of these supporting sectors. The need to support growth in this sector aligns with one of the three priorities for the LIS including to broaden the base of local economic growth, which has traditionally been unevenly spread.
- 2.54 The South East Local Enterprise Partnership SEP (2014) emphasises on the economic importance of imports and exports at sea ports in the area, together with their associated road and rail networks. As such, the South East SEP highlights that there are significant opportunities for growth in the associated transport and logistics sectors.
- 2.55 The LEP is currently preparing their LIS and A first working draft was presented to the LEP's Strategic board in January 2020. This draft LIS recognises the concentration of employment in the transport and logistics sector in the South East, reflecting its *“gateway location”*. The draft LIS also noted a shared commitment with London to develop the capacity of industrial and logistics sectors in the wider area.

2.56 As a result, both LEPs recognise the importance of storage and distribution sector within their economies and prioritise their strategies across addressing emerging capacity issues that the sector faces. These strategies comprise the overarching framework for the emerging new Local Plan of Uttlesford District.

Summary

2.57 There is a substantive body of existing policy and evidence albeit much of it is out of date or not fully crystallised. The key points arising from our review include:

- 1 The proposed site was considered unsuitable for employment allocation by the SLAA based on the conclusion that it “*would not contribute to sustainable patterns of development*”. In accordance to NPPF, we consider that the location of the site would not represent an unsustainable pattern of development given the NPPF requirement to accommodate the specific locational needs of distribution sector and the site’s relatively moderate scoring against the CPZ’s purposes.
- 2 The Reg. 19 Draft Uttlesford Local Plan (withdrawn) proposed a net requirement for 10.2ha of industrial land from 2016 to 2033, based on the Uttlesford District ELR Update (May 2017) and the West Essex and East Hertfordshire Assessment of Employment Needs (October 2017). However, policy implications in relation to the on-time deliverability of allocations (within the plan period) are questioned. In addition, the examining Inspectors highlighted the lack of evidence around the garden communities’ employment allocations.
- 3 The Local Plan (withdrawn) proposed to allocate 55ha of employment land at the North Stansted Employment Area as one major employment centre, however this cannot be considered developable (in short and medium terms) due to safeguarding policies and ownership constraints.
- 4 The Local Plan (withdrawn) noted an aspiration for “*strategic*” warehouse and distribution depots with good access to Junction 8 of the M11, albeit did not identify specific sites in this area. There is, therefore, a recognition of the area’s strong distribution activity and its geography and accessibility, but the Draft missed the opportunity to address the upcoming pressures creating the risk of the area to be developed organically.
- 5 The Ensuring Robust Employment Evidence for the Uttlesford Local Plan report (September 2018) stated that the Reg. 19 Draft Local Plan contained a substantial over provision of total employment land in quantitative terms, but that was largely a result of large allocations at North Stansted and Chesterford Research Park, which have been intended to provide for long term needs beyond the Plan period. In addition, the report stated that the ELR (2017) focused on net floorspace changes alone and did not take account of gains and losses, which indicate a “muted” level of activity.
- 6 The Uttlesford District ELR Update (May 2017) noted that vacancy rates were below the optimum level and recommended that the Council identify opportunities to bring forward new industrial land to meet the needs of future occupiers. This element was not addressed in the Draft Plan.
- 7 The Property Delivery Advice (June 2016) reviewed only the development pipeline in relation to employment sites with buildings and did not address the need for open employment land, including land for B8 use. The report demonstrated that there was clear developer interest in the areas around Stansted Airport and the A120 corridor.
- 8 Uttlesford Economic Development Strategy and Action Plan for 2018-21 period identify logistics as an opportunity sector across the local economy. In addition, the plan includes the Junction 8 of the M11 improvements within its transport priorities to support strategic developments in the wider airport’s area.

- 9 The North Side area, where the current depot is located, was proposed for redevelopment through both the Local Plan (withdrawn) and the Airport's SPD. It was also subject of a scoping opinion request for the site's redevelopment dated in 2017 relating to an open-B Class scheme.
- 10 The Greater Cambridge Greater Peterborough and South East Strategic Economic Plans and adopted and emerging Local Industrial Strategies, highlight the importance of the transport and storage sector in their economies and provide the evidence to support an increased employment land provision across their boundaries.

3.0 **Operator's Requirements and Market**

3.1 This section presents the nature, service and operation processes of Wren Kitchens and identify its specific locational requirements. It also defines the area of search that responds to those requirements and, finally, highlights the application site's suitability to respond to these requirements.

Operator's nature and service

3.2 Wren Kitchens is one of the largest and most recognised kitchen retailers in the domestic market with an award-winning distribution network. The company employs over 4,000 people and is the largest employer in Barton upon Humber, North Lincolnshire, where it is based. Apart from the Barton manufacturing facility, there are seven regional depots located in Howden, Barton, Bristol, Stansted, Larkhall, Manchester and Glasgow and 99 showrooms across the UK. Currently the operator delivers over 2,000 kitchens every week across the UK with an on-time accurate delivery rate of 99.5%.

3.3 The company is growing substantially. The manufacturing facility at Barton secured permission for a significant expansion in 2019 for the erection of a 100,000m² (c. 1m ft²) facility adjacent to the current manufacturing unit, reflecting the growth that the company is experiencing. In addition, over the last two years, more than 20 showrooms and two regional depots have opened nationwide, with three more depots being on planning or initial development stages. The current forecast suggests an annual growth rate between 20% and 30% is expected for the next couple of years.

3.4 Wren's logistics team will be increased by over 20% this year - according to the company's growth plans - to accommodate the increased demand. The logistics department has won a plethora of business awards with regards to on-time delivery, efficiency of their logistics methods, high technologies, employee-oriented company, health and safety issues and various other categories. Most recently it has won the business excellence category at the Motor Transport Awards, where large distribution companies such as Hermes and Parcel Force were also candidates. This recognition from the industry highlights that Wren's distribution operations are well-recognised and considered among the most efficient.

3.5 Wren operates a unique distribution system, which is expanding at a fast rate. The company owns the entire vehicle fleet, and all drivers and porters are directly employed by Wren. The transport fleet consists of over 214 new technology vehicles. It should also be highlighted that the company is planning to invest to high-tech and low carbon electric urban fleet to comply with environmental regulations in the near future, particularly with regards to servicing urban conurbations such as London. However, due to mileage limitations for electric vehicles (see paragraphs 3.22 to 3.24), the company needs to have a comprehensive depot network that supports the on-time delivery and efficiency of the existing distribution operations.

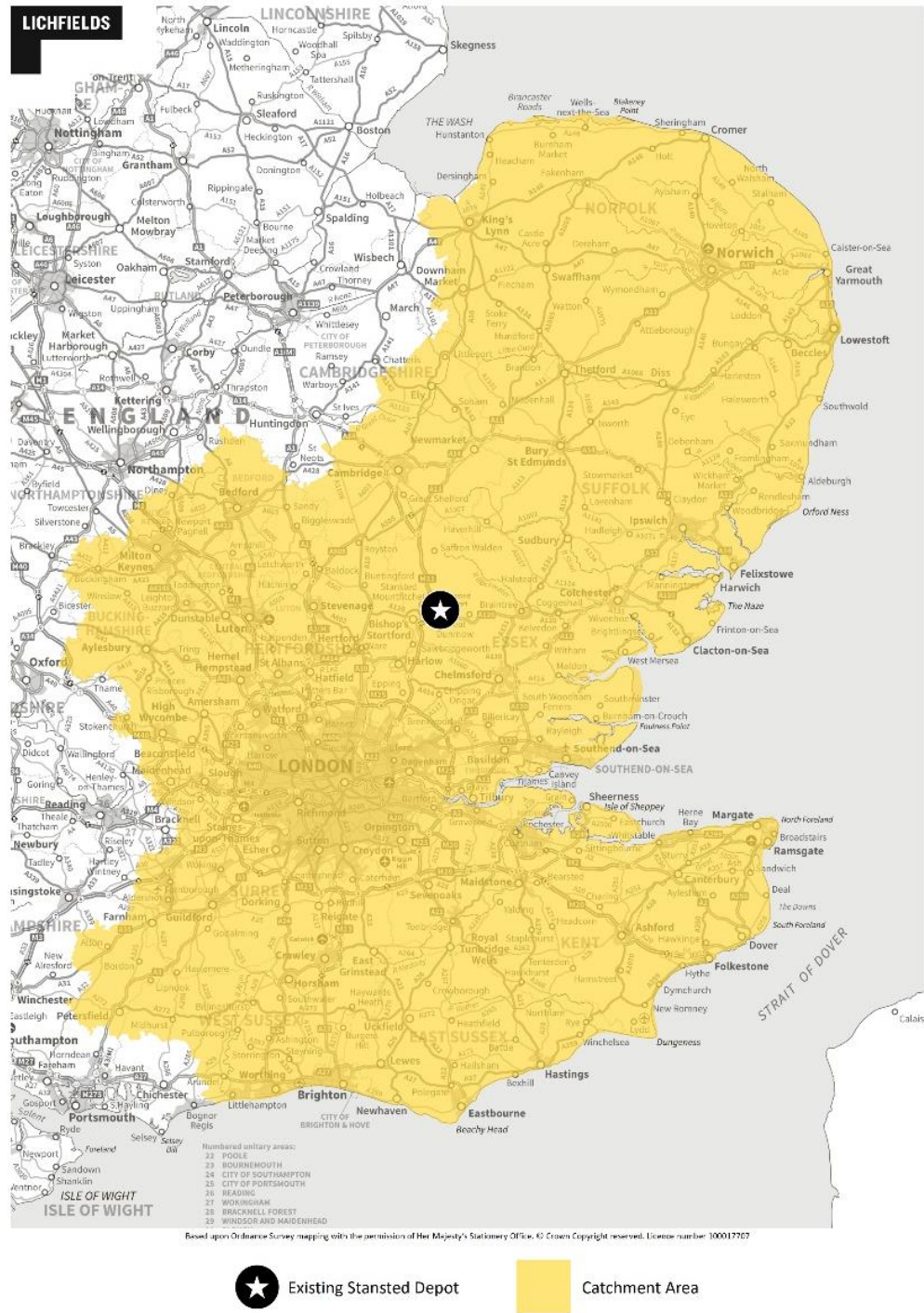
3.6 The operation cycle begins once kitchens are ordered by customers in one of the retail showrooms. The kitchen selected is manufactured in Barton and then transported in a large HGV to a regional depot. From there, the container (also referred as a box body) is swapped through demountable operations from the trunking vehicle to a smaller urban distribution vehicle, which loads the container (that on average has a capacity of two kitchens) and runs the last mile delivery to the customers' home. The HGV returns to the base in Barton to reload and the cycle begins again. The distribution operations run 24 hours a day, seven days a week. In 2019, the operator achieved a reduction of 33% in road miles due to their triple-trunking method which sees demountable box bodies pulled by one 18-tonne truck.

- 3.7 This operational pattern does not require a warehouse, as the company operates without stockpiling the products. This demountable logistics system allows quick and efficient turnaround of the delivery trips and minimises product damage. As a result, the main requirement of the regional depots relates to hardstanding truck areas with enough circulation and parking space for HGVs, lorries and urban transport vehicles.
- 3.8 The proposed site meets the operator's locational and spatial requirements. With regards to specific locational requirements, the following section provides a detailed justification of the area of search based on various parameters (see paragraphs 3.14 to 3.42). In terms of the site size, there is a need based on current operations of at least 2 ha of land to accommodate the truck, urban fleet and employees parking, together with the appropriate circulation space for HGVs and the portacabin office facilities. Once the immediate future growth plans of the company are included the requirement for the new depot is increased to at least 3 ha reflecting the regional role of Stansted depot across the rest of the southern depots network (see section below).
- 3.9 As described above, the operator provides bespoke distribution services and the proposed site relates to conventional logistic uses within B8 Class, albeit there is no need for a warehousing facility as the Wren system is bespoke, without stockpiling requirements just an open-land storage facility.

Operator's distribution network

- 3.10 Wren has a fleet of over 214 vehicles which travel to customers across the UK from currently seven depots that are located in Howden, Barton, Bristol, Stansted, Larkhall, Manchester and Glasgow.
- 3.11 Wren's logistic operations are important for the company's competitiveness and, therefore, a significant investment is in place to expand their depot network and increase its functionality. There are plans for further transport depots to be developed including, in relation to the southern parts of the country, the recently permitted depot in Rochester, Kent and the proposed depot in the area around Heathrow Airport.
- 3.12 Based on the current geographical distribution of the existing transport depots, together with the size of the various sites, the Stansted depot runs as a key regional distribution hub servicing the Southern parts of the country. Figure 3.1 shows the current service area of Stansted depot expanding across the eastern parts of East and South East regions and London as a whole. The depot is located strategically to serve any area within a catchment of between 2.5 hours and 3 hours driving distance.

Figure 3.1 Current service area from existing Stansted depot

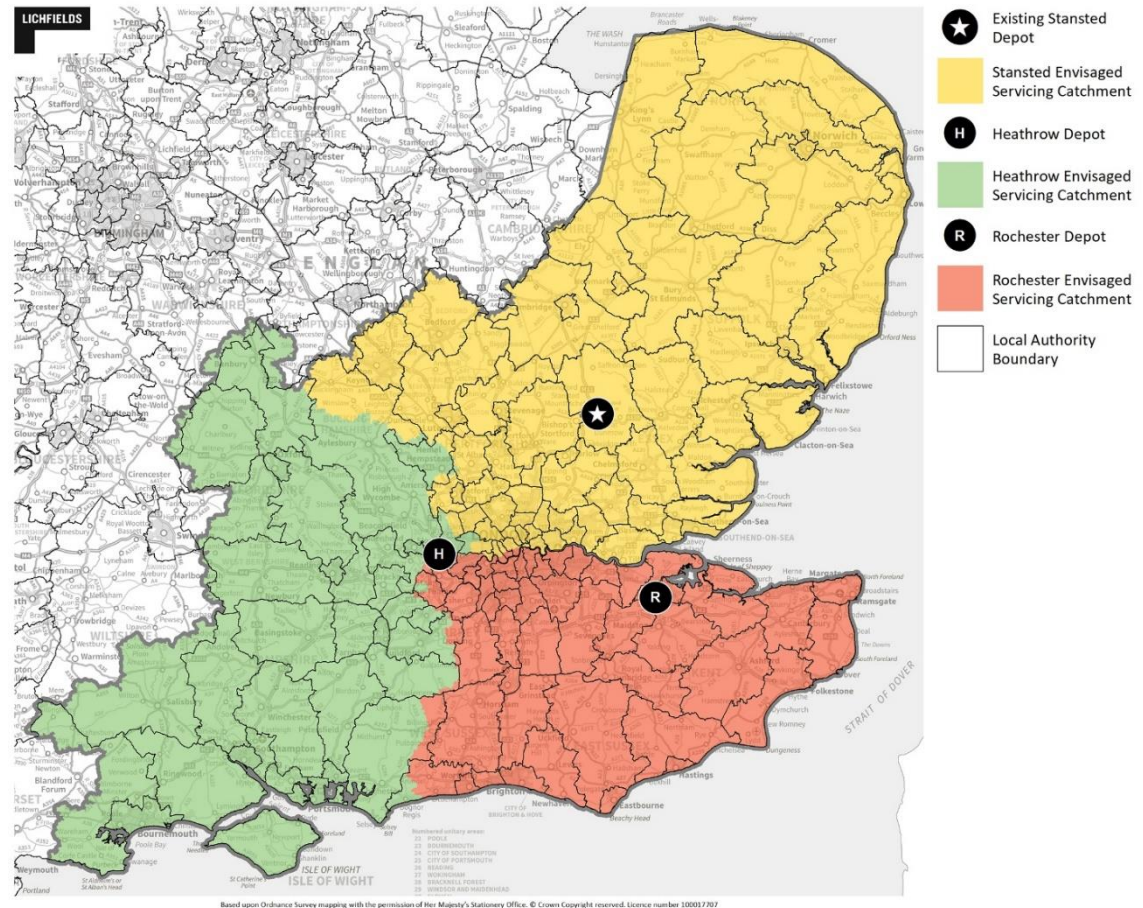


3.13

Once the Kent and Heathrow facilities are operational (within the next three years), they will complement the function of Stansted depot. In particular, South London and the southern parts of the South East would be covered by these depots as presented in Figure 3.2. However, Stansted will maintain a regional role for the southern network with interchange facilities and services to the rest of the emerging network. In particular, it is envisaged within the operator’s strategy that the HVGs from Barton will terminate in Stansted due to driving-time regulations

and limitations and smaller vehicles will transfer the box bodies to Rochester and Heathrow’s depots.

Figure 3.2 Future service area from southern depots



Source: Wren Kitchens – Lichfields analysis

Define the area of search

3.14 This section defines Wren’s area of search for a new location for its Stansted depot in order that it can continue contributing efficiently to the operator’s logistics network and being aligned with the company’s future growth plans.

3.15 The following parameters have been factored in the analysis to identify the most suitable area of search.

1. Driving distance from the company’s base in Barton

3.16 In compliance with [Drivers’ Hours \(EU Regulations\)](#) the driving distance from Barton should be less than 4.5 hours. The depot was previously (pre-2017) located in Hoddesdon and Wren advise us that this was consistent with working within the 4.5 hour limit for an HGV to reach the depot at that location.

3.17 Using Experian’s drive time isochrones for peak driving time for a conventional vehicle (i.e. not an HGV), the Hoddesdon depot generates a drive time of 3.5 hours from Barton. Recognising that an HGV is slower than a conventional vehicle and there is need for some flexibility to

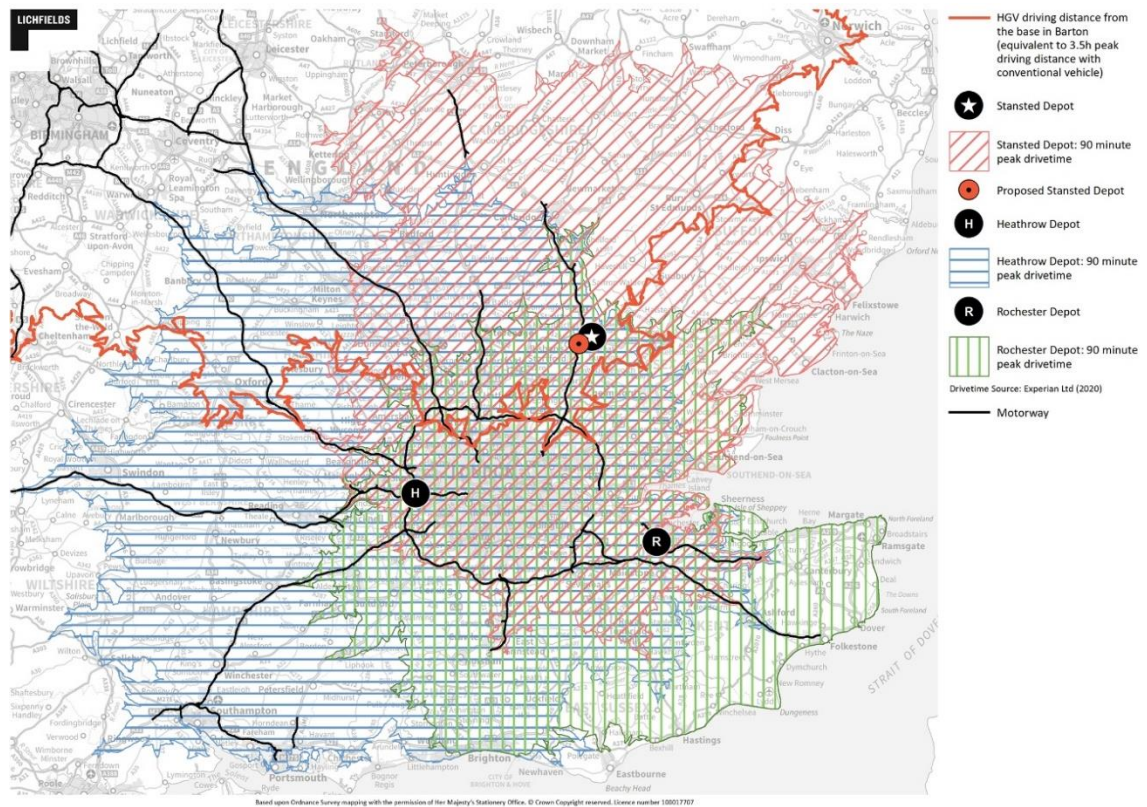
account for delays (and reduce the risk for a driver to reach their 4.5 hour limit before reaching the destination), for the purpose of defining an operationally viable area of search, we have applied this 3.5 hour peak time conventional vehicle driving distance from Barton. This catchment expands up to M25 as illustrated in Figure 3.3.

2. Distance from the rest of the southern network

3.18 The new depot should be either in equidistant travel from the emerging southern depots, namely Rochester and Heathrow, or at least within a 1.5-peak hour driving distance from both. This is important in order to provide efficient interchange services to these depots, including the fact that Stansted depot will be the HGVs’ terminal for the southern network.

3.19 On this basis, Figure 3.3 illustrates the relevant catchment areas for each southern depot together with the driving distance of HGVs from the base in Barton.

Figure 3.3 Driving distance catchments



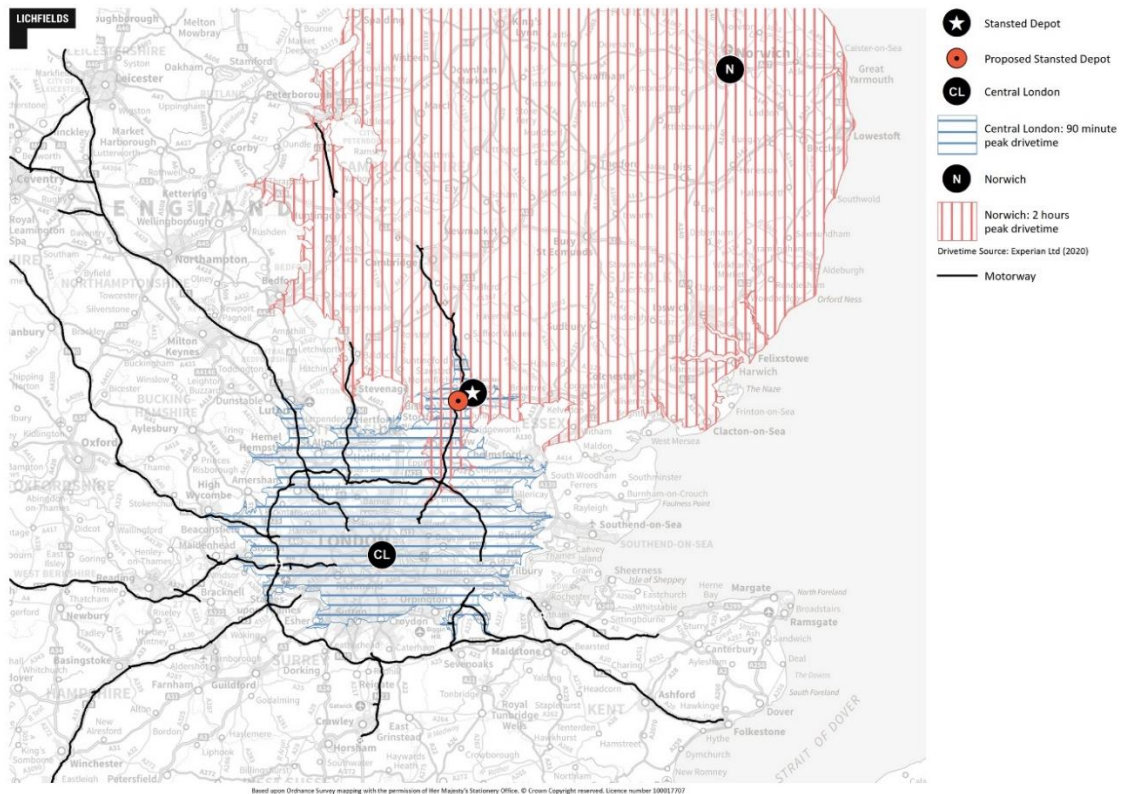
Source: Experian 2020 – Lichfields analysis

3.20 In this context, the overlapping area expanding north of M25 across M11 to Junction 9 in Great Chesterford, A1 to Stevenage and M1 to Luton represents the locations in accordance to the specified time distances.

3. Servicing the catchment area

3.21 In addition, the site will need to serve a wide area (see Figure 3.2) from Norfolk to Central London. As such it should be located within an area that provides similar driving distances from Central London and Norwich. Indeed, this location is within 1.5h to 2h peak driving distance from these locations and as presented in Figure 3.4, only locations with access to J6, J7 and J8 of M11 can comply with these time limitations.

Figure 3.4 Servicing the catchment area



Source: Experian 2020 – Lichfields analysis

4. Electric vehicles for the last mile delivery

- 3.22 National government policy encourages a transition towards ultra-low emission vehicles, including electric vehicles, over the next few years. The Mayor of London has also set out plans to transform London to a leading zero-emissions city. As a result, an Ultra-Low Emission Zone (ULEZ) has been introduced in Central London, with plans for expansion across the Capital in the future. This runs on a 24-hour a day, 7-day a week basis.
- 3.23 In compliance with these policies, the operator will introduce electric vehicles to serve urban areas and particularly London. Stansted, Rochester and Heathrow depots will use an electric fleet to service their London catchments as presented in Figure 3.2.
- 3.24 There are, however, some limitations in terms of the distance coverage of electric vehicles of around 90 miles between charging sessions. From Stansted to Kensington (which is within Stansted’s catchment) is almost 43 miles and to Shepherd’s Bush is 46 miles which is just about within the sufficient distance for a return trip to the base. Therefore, any locations further north from Junction 8 could not allow Wren to service London with electric fleet.

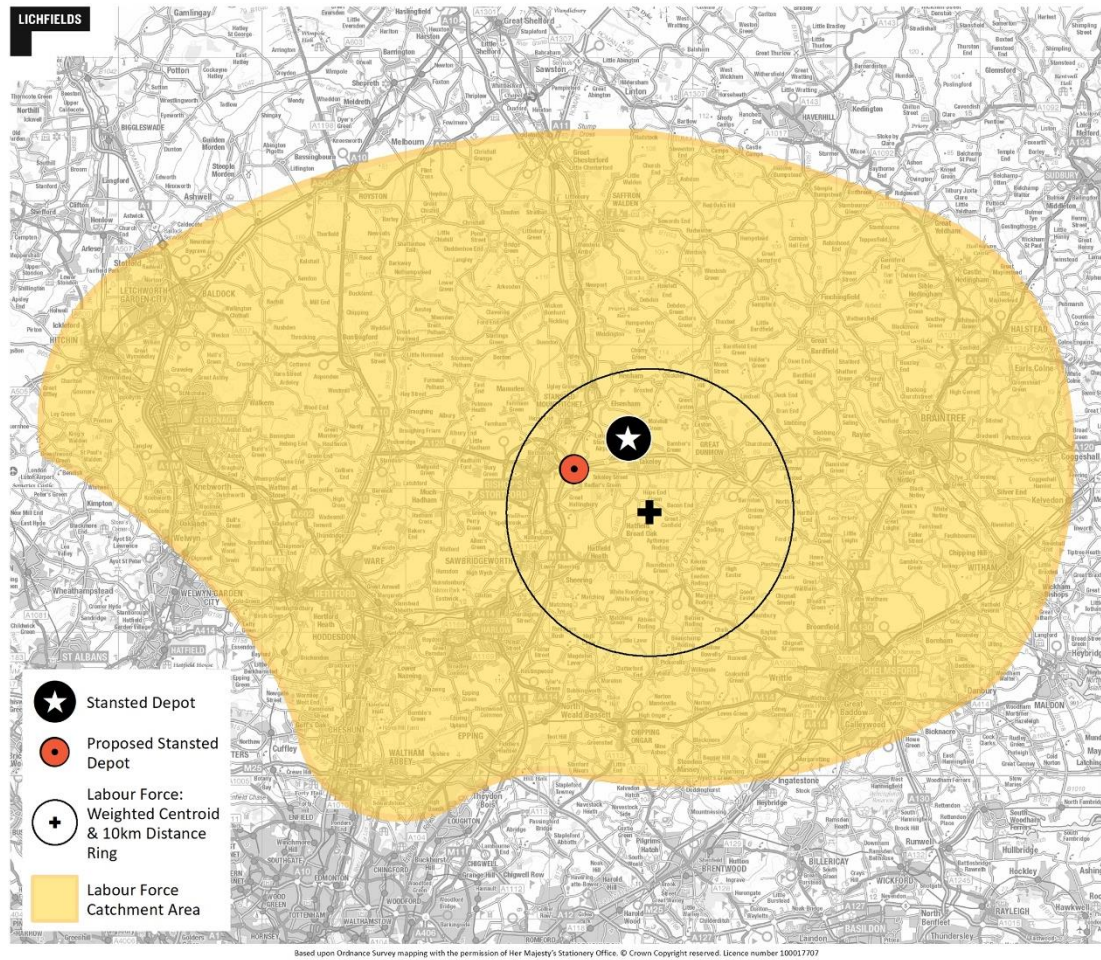
5. Labour catchment area

- 3.25 Three years ago, when Wren’s regional depot moved from Hoddesdon to Stansted site, there were significant additional costs associated with training new workforce to serve Stansted’s depot.
- 3.26 The analysis of the existing labour catchment area reveals that most of employees in Stansted reside in Harlow and Braintree, followed by Uttlesford and East Hertfordshire. All these areas are within 20-minute driving distance from the Stansted depot. There are also commuters from

Hoddesdon, albeit in a relatively smaller scale. The rest of the workforce commutes from scattered areas expanding almost linearly from Stansted to Stevenage and Colchester across A120.

3.27 Figure 3.5 illustrates notionally the labour origin area. The weighted centroid, which is just 5.5km from the proposed site and 6.5km from the current site, is a geospatial analysis tool that shows the weighted centre of the distribution of existing workforce. The location of this geometrical estimation highlights the origin clusters around Harlow and Braintree.

Figure 3.5 Labour origin Analysis



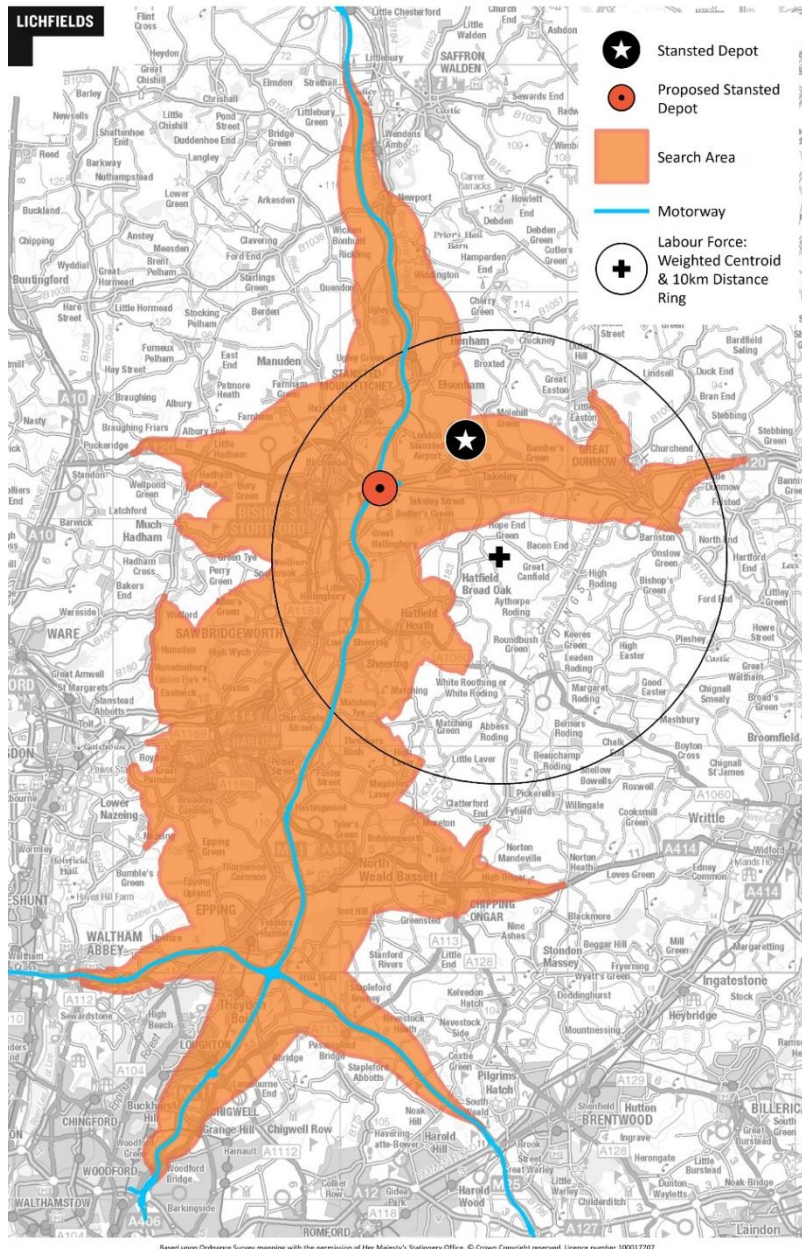
Source: Wren Kitchens – Lichfields analysis

3.28 In this context, the proximity to the existing facility or at least to the weighted centroid, is an important factor to avoid increasing commuting times and consequently losing workforce. The new depot will have an increased employment provision which will require additional training, but this could not compare to providing training for the entire workforce. Indicatively, it is estimated that around 200 employees will be based in Stansted. More detailed figures are provided within Section 5.0 Economic Benefits Assessment.

3.29 On this basis, any site within a 10km-distance of the weighted centroid would be considered preferable in terms of retaining the same labour force and minimising training and recruitment costs. It should be noted that the proposed site falls within this catchment with just 5.5km distance from the weighted centroid.

3.30 Combining all these factors together, Figure 3.6 illustrates the identified area of search where the new depot should be located within in order to ensure a continuation of the network’s efficiency integrating the future growth plans of the operator. The 10km buffer related to labour force origin has been included, however due to land constraint issues, we have sought to consider this factor as a non-limited, albeit desirable, parameter for defining the area of search.

Figure 3.6 Area of Search - Combined parameters 1 to 5



Source: Lichfields analysis

3.31 The area of search expands across M11 from Saffron Walden south of M11 Junction 9 to M11/M25 Junction 6 (Theydon Interchange). In particular, the area of search is identified as the areas in proximity of Junctions 6, 7 and 8 of M11 motorway. This expands north west across A120 crossing Bishop Stortford and extending to the village of Little Hadham. At north east, it crosses A120 to Great Dunmow, covering the area around the airport.

3.32 Around Junction 7 of M11, the area expands at west across A414 up to Roydon, covering the town of Harlow entirely and at east to Chipping Ongar through Epping Road.

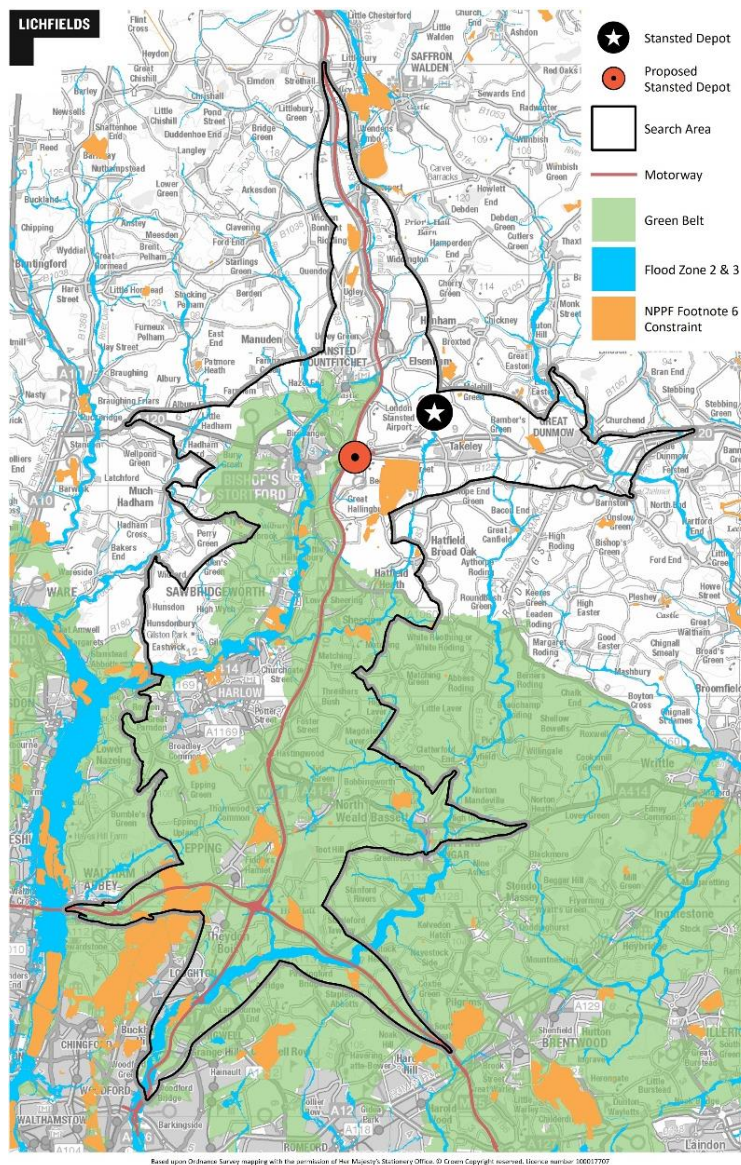
3.33 The southern parts of the area of search include Epping and Theydon Bois at west and across M25 to A12/M25 junction near Brentwood (Brentwood falls outside of the area).

6. Environmental constraints of national significance

3.34 Applying the presumption in favour of sustainable development, in accordance with NPPF Paragraph 11 and Footnote 6, the analysis excludes those areas that are designated as areas of natural importance. These include habitats sites and/or designated areas as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park; irreplaceable habitats; designated heritage assets; and areas at risk of flooding.

3.35 Figure 3.7 shows the expansion of environmentally constrained areas.

Figure 3.7 Environmental constraints



Source: Lichfields analysis

3.36 Although one might argue to include Green Belt within the potential availability, it is known that development on land within Green Belt would need to be demonstrated by very special circumstances, and this would require showing there were no alternative sites in the area of search not constrained by Green Belt. Conversely, removing land from Green Belt would have a uncertainty and timescale that is not compatible with Wren's current business needs. For the purposes of this analysis and considering that there is an available site (the proposed site) that falls outside of those environmental constraints, there is no requirement to consider unallocated sites that are subject to Green Belt designation. For these reasons, we have excluded unallocated sites within Green Belt from the assessment of the potential availability.

7. Other qualitative factors

3.37 The area of search expands across Junctions 6, 7 and 8 of M11. As presented in Figure 3.7 the southern parts around Junction 6 (Theydon Interchange with M25) have been excluded due to Green Belt and NPPF Footnote 6 designations.

3.38 Even if those areas were to be included within the analysis, there are important accessibility issues associated with them that would eventually exclude them from the analysis. Although adjacent to Junction 6 of M11/M25 there is no access/exit to these motorways from the local network. The access is provided through Junction 7 (Harlow) and any potential distribution development relating to HGVs traffic flows would impact on the local road network of Epping Forest and it would be most likely to be refused.

3.39 Another important qualitative factor that should be considered with the assessment relates to land availability and deliverability in the short term. This is further explained in the following sections when we scrutinise the available land; however, at this stage of the assessment, we have sought to exclude apparent showstoppers in planning terms including land within the Green Belt and land covered by Footnote 6 designations.

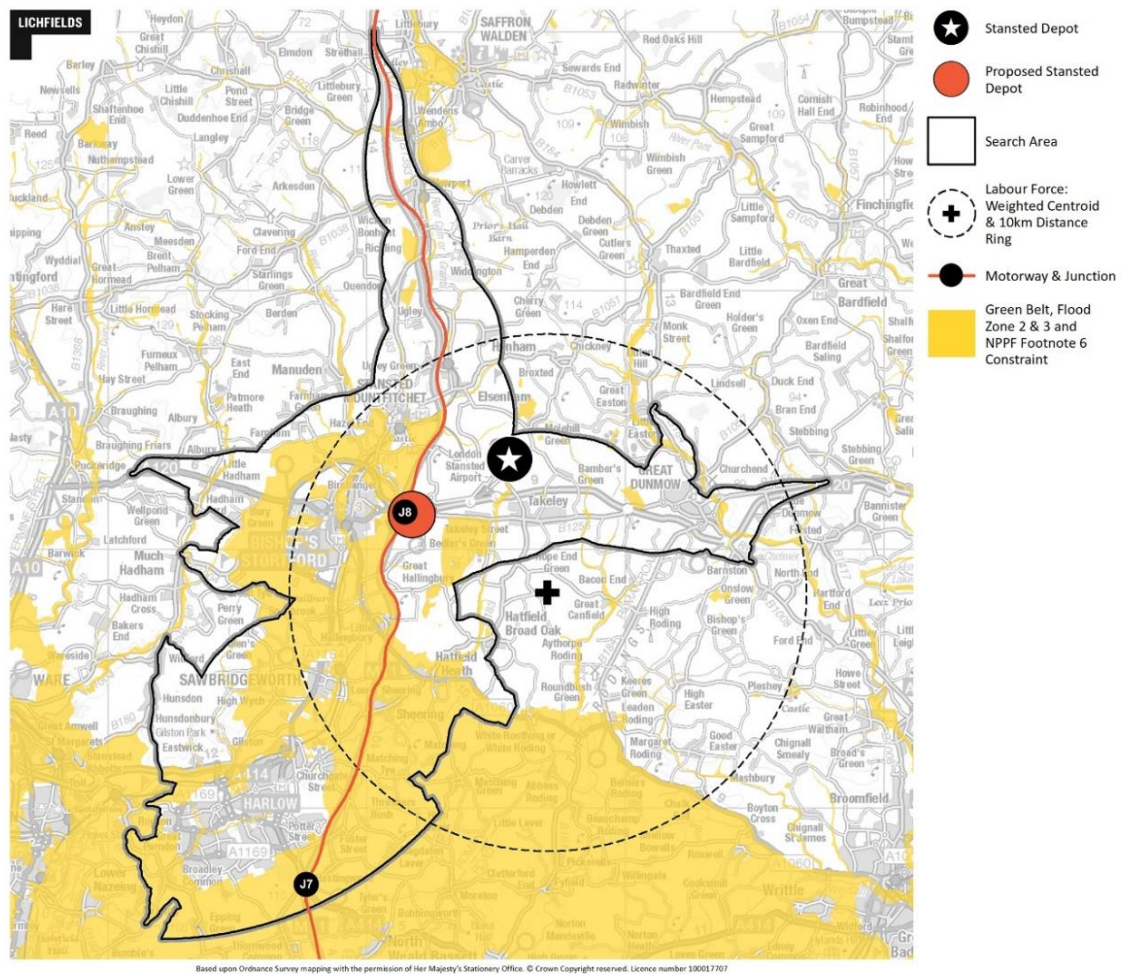
The area of search

3.40 Combining the analysis above, Figure 3.8 presents the area of search, within which the operation should be located to fulfil Wren's bespoke locational requirements. Although the labour-origin catchment of 10km from the weighted centroid is not considered as a determinative factor, any site within this area should be more desirable as it could potentially minimise any additional costs for training and recruitment purposes and reduce commuting lengths for existing workers.

3.41 The area expands mainly around Junction 8 across A120 to Great Dunmow. This east quadrant is preferable in terms of meeting all the locational requirements including the proximity to current facilities and the weighted labour origin centroid. Notably, the proposed site falls within this area.

3.42 In addition, the area of search covers Bishop Stortford and the area across A120 to the village of Little Hadham. Harlow is also part of the area of search, together with the area expanding north west of Harlow across A414 to Roydon and at north to the village of Widford.

Figure 3.8 Area of Search – Combined all parameters



Source: Lichfields analysis

Current Depot

- 3.43 Stansted depot is currently located within the North Side airport area, which is identified in Figure 2.1. This is a temporary facility for the next three years. The site was originally owned by the Manchester Airport Group (“MAG”), which leased it to Wren for a short-length period between 2017 and 2020. Since Summer 2020, the site as part of MAG’s estate has been bought by a new owner, who has extended Wren’s lease for three more years (to 2023). Estate agents that act on behalf of the new owner have confirmed that this leasing arrangements have no scope for further extension as the owner intends to progress with the site’s redevelopment post 2023.
- 3.44 North Side was proposed for redevelopment in both the Local Plan (withdrawn) and the Airport’s SPD. It was also subject of a scoping opinion request for the site’s redevelopment in 2017 (see paragraphs 2.42 to 2.49). Although there is no evidence of any recent planning activity since 2017 with regards to the area’s redevelopment, the agents that act on behalf of the site’s owner have confirmed that this will come forward in short term.
- 3.45 The emerging proposals are understood to be inspired by Manchester Airport business park (“Airport City”) and will include high-quality HQ office buildings and modern distribution warehouses. It is understood that there is no intention by the owner/developer to accommodate open-storage facilities (reflecting Wren’s operations) within the site.

3.46 On this basis, Wren seeks to secure a permanent location for the Stansted facility as their investment plan could not rely on a temporary facility of three-year leasing arrangements particularly for this regional depot which comprise a key node of Wren's southern network.

Proposed site and locational advantages

3.47 The proposed site west of Tilekiln Green offers this permanent solution and its location and characteristics make it the most suitable location for Wren's distribution operations. The site is adjacent to Junction 8 of the M11 motorway. To the north of the site is Dunmow Road and across the road, north east of the site is a petrol station. To the south east there is a small sewage/water treatment plant and three residential buildings on Tilekiln Green. To the west lies Junction 8 and M11 motorway and to the south a disused railway line beyond which is agricultural land.

3.48 The site extends to some 5.12 hectares of which 3.07 hectares is proposed to be developed. The remaining land, which is mainly around the edges of the developed area, will remain in its current condition, that being predominantly woodland or areas of the open land where significant new tree planting is proposed.

3.49 The site is highly accessible and well-integrated to the motorway network and there are no substantive planning issues with neighbouring uses or natural designations. These - together with other site characteristics that are presented below - establish the site as a strong location for logistics operations, in general, and a very suitable location for Wren's distribution operations.

3.50 The key locational advantages of the site that make it a suitable location for Wren's operations, include:

- 1 **Accessibility:** The site is adjacent to Junction 8 M11 with high accessibility and good condition links to the motorway network. This is key for the operations of Wren Kitchens as the site should be within maximum 4.5-hour HGV driving distance (at any time, including peak time) from the base in Barton and in close proximity (less than 90 minutes, including peak hour, driving distance) to the rest of the southern depots.
- 2 **Proximity to the market it serves:** The site is appropriately located in relation to the market it serves as it is located centrally of the current service catchment (Figure 3.1). Based on the relative size of the market that will serve in the future (once the southern depot network is completed with the introduction of Rochester and Heathrow depots - Figure 3.2) this location is weighted towards the dense population of the market (i.e. London), but it is still within a maximum of 2.5-hour driving distance from the north edge (i.e. Town of Cromer in Norfolk) of the envisaged service catchment area and below 2hour-driving from Norwich.
- 3 **Land availability:** There has been a continues investigation of available land around the targeted area since 2017. It is evident that there is shortfall of distribution land against the demand for logistics in this location. Section 4.0 presents a detailed demand-supply position across the area and the District as a whole, highlighting the shortfall of land for distribution operations and particularly for open storage which is considered by the developers and stakeholders as one of the least profitable uses for B8 Use Class employment land. The site is available immediately for Wren's operations, in contrast to the rest of the land supply around the area of search.
- 4 **Suitable size:** The size and layout of the site should allow for flexibility in its configuration so that it can accommodate the size and facilities required to serve its market. Indeed, the proposed site is of a size (i.e. 5ha) that can accommodate the increasing requirements for additional capacity in line to the operator's growth strategy, which relates to a requirement

of 3 ha of land. In addition, the site's shape allows for a functional layout to be designed, in accordance to the operator's bespoke circulation and open storage spatial needs.

- 5 **Labour accessibility:** Every business should be located in an area with enough labour supply. The site lies in the heart of the Stansted depot's labour catchment area (Figure 3.5). Wren invested in extensive training of the current workforce (i.e. 130 employees) in this area when they moved from Hoddesdon to Stansted three years ago. Therefore, obtaining the same labour catchment is a very important parameter in considering the location of their new depot as they should avoid additional costs on training and recruitment. The proposed site is in proximity to the current depot and it is expected to create no impacts in terms of maintaining existing employees.
- 6 **Neighbouring uses:** Logistic sites should be located away from incompatible land-uses. Apart from the residential buildings at south east, the rest of the neighbouring uses are compatible with logistic operations. The design can mitigate any views and noise that could potentially be created by the development. It should be noted that the residential units in proximity to the site are within the airway of Stansted and just 1.2km away from the airport's runway and as such they are already exposed to high noise levels. The site's layout and design proposals mitigate potential nuisance to those uses.
- 7 **Policy support:** Albeit the site is not allocated for employment; it is part of the A120/M11 growth corridor that is supported for strategic employment development through the overarching strategies. The District's Economic Development Strategy refers to improvements in Junction 8 of the M11 to *support* strategic development in Uttlesford and neighbouring districts beyond 2033. Currently the site is subject to Policy S8 The Countryside Protection Zone in the 2005 Local Plan. However, this has now limited weight due to the fact that was adopted 15 years ago. NPPF paragraph 82, which urges planning decisions to *"recognise and address the specific locational requirements of different sectors including distribution operations... at a variety of scales and in suitably accessible locations"* has much more weight in planning terms.

Summary

- 3-51 This section presents in detail the proposed site's operation and justifies how this relates purely to distribution uses within B8 Use Class. It also explains the reasons, which are mainly related to uncertain leasing arrangements, for the urgent requirement to secure a move to new facilities.
- 3-52 A detailed definition of the area of search in accordance to the operator's specific locational requirements is presented above. This is the area within which the operator needs to be located to fulfil its locational requirements and continue to thrive.
- 3-53 The area of search expands across M11 from Saffron Walden south of M11 Junction 9 to Junction 7 (Harlow Junction), including at north west Bishop Stortford and the areas extending across A120 to the village of Little Hadham. At north east, it expands across A120 including Stansted Airport and Great Dunmow (east edge). The north edge of this quadrant is Widdington Village in Saffron Walden. Around Junction 7 of M11, the area of search expands at west across A414 up to Roydon, covering the town of Harlow entirely. At the north of this section the area of search expands up to the settlements of Hunsdon and Widford.
- 3-54 The section also justifies in detail how the proposed site responds fully to these requirements and lists the locational advantages that make the site suitable for Wren's operations.
- 3-55 To set the site in context, the next section considers the demand and supply position of distribution uses across the area of search together with the position across Uttlesford District and neighbouring authorities within the same functional economic market area.

4.0 Demand and Supply Position

4.1 Following the analysis of the operator's nature and area of search, this section provides an assessment of the employment land position, solely related to sites that are available for warehousing and distribution uses (B8 Use Class), within the defined area of search from both a demand and supply perspective.

4.2 The section also presents the overall demand and supply position of Uttlesford District together with Harlow, Epping Forest and East Hertfordshire Districts, covering entirely the associated Functional Economic Market Area, based on the most recent evidence to put the analysis into perspective.

Demand in Uttlesford and FEMA

4.3 Policy SP4 in the Reg. 19 Draft Uttlesford Local Plan (Withdrawn) proposed a minimum net increase of 14,000 jobs in the period 2011 to 2033, at a ratio of one new job per new home (Policies SP3 and SP4), although it stated that c.16,000 jobs were expected to be created across the plan period (paragraph 3.76), which is in accordance to West Essex and East Hertfordshire EDNA that underpinned the plan's employment policies.

4.4 It should be noted that this figure (i.e. 16,000 jobs) derives from the job growth distribution across the FEMA and according to the EDNA the cumulative figure was below by 2,100 jobs required to "balance the labour supply" across the market area. The assessment concluded that additional provision could be accommodated through increased job densities and/or windfall development without providing further evidence to support this assumption.

4.5 The Draft Plan (Withdrawn) anticipated an increase of 700 jobs in the warehousing sector and a loss of 700 manufacturing jobs during the local plan period (paragraph 5.23), foreseeing an increasing role of distribution sectors in the employment land of the District.

4.6 It is evident that Uttlesford's industrial need is driven by warehousing and distribution requirements. The EDNA forecasted a net requirement for distribution uses of 83,400m² of B8 Class solely across FEMA for 2016-33. The B2 equivalent was -86,900m². The gross requirement including replacement allowances and flexibility margin, which related to a combined industrial and warehousing figure, totalled 505,000m² or 65 ha across the FEMA. The industrial and manufacturing need distributed to Uttlesford related to 22ha.

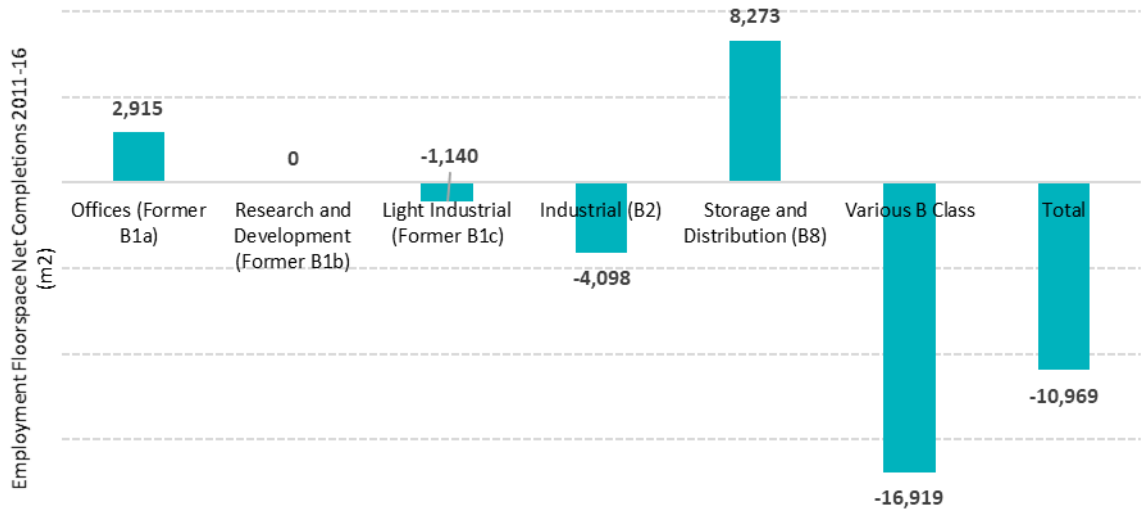
4.7 The Draft Plan (Withdrawn) proposed a net requirement for 10.2ha of industrial land (B1c, B2 and B8 uses) during the period from 2016 to 2033. This resulted from excluding 49,000m² consented floorspace for office and industrial uses. It should be noted however that 52% of that consented industrial floorspace will be deliverable in longer term (Draft Plan Chart 5, p105).

4.8 The Draft Plan (Withdrawn) also stated that the net requirement is driven primarily by demand for B8 warehouse and distribution uses, taking advantage of London Stansted Airport and the strategic road connections in the south of the District (A120/M11 Corridor) (paragraph 5.23, p 106). In particular, at paragraph 5.25 (p107) the Draft Plan noted an aspiration for "strategic" warehouse and distribution depots in locations with good access to Junction 8 of the M11. The proposed site is located within this Corridor. However, the Draft Plan did not identify specific sites in this area.

4.9 The figure below shows the net completions data across Uttlesford for the period between 2011 to 2016 (the most recent data available). Although the overall employment floorspace has been decreased, the storage and distribution, followed by office space have seen significant gains.

This supports further the assumptions that distribution has a key role within Uttlesford economy and employment land.

Figure 4.1 Employment Floorspace net completions 2011-16, Uttlesford District (m2)



Source: Arup (2017) Uttlesford ELR – Lichfields analysis

Requirements across the FEMA

- 4.10 The current statutory development plan for Harlow, the Adopted Replacement Harlow Local Plan, was adopted in July 2006 and is now considered dated. The emerging new Local Plan is at an advanced stage, with the Schedule of Main Modifications having been published for consultation on 12 March 2020.
- 4.11 The Pre-submission Draft Local Plan indicates a net requirement of 16 ha for industrial and distribution (B2/B8 Use Class) employment land in the District. This figure derives from the same evidence study to Uttlesford, namely the West Essex and East Hertfordshire EDNA.
- 4.12 Epping Forest's original Local Plan was adopted in 1998. In 2006 the Council adopted the Local Plan Alterations, which replaced parts of the 1998 Local Plan.
- 4.13 The Draft Epping Forest Local Plan was submitted to the Secretary of State for examination in public on 21 September 2018. The Council is currently working to prepare Main Modifications to address the Inspector's comments (as of 2 October 2020).
- 4.14 The Submission Version Draft Local Plan indicates a net requirement of 14ha for industrial and distribution employment land in the District. The same evidence (EDNA) supports this figure.
- 4.15 Finally, East Hertfordshire Local Plan for 2011-33 period was adopted on 23 October 2018 and indicates a net requirement of 19-20ha for industrial and distribution uses, which was slightly above the EDNA's recommendations of 18ha.

Distribution requirements in the area of search

- 4.16 It is evident across the commercial market that, although Uttlesford District has mainly an indigenous and localised demand for industrial space which is driven by the need for small and medium enterprises (SMEs), the area around Stansted Airport and A120 (also referred as the southern parts of the District) has a regional focus particularly for distribution uses which stands out from the rest of the market.

- 4.17 Indeed, demand for larger distribution premises is evident across the area of search. We have liaised with Coke Gearing Consulting (“CGC”) to provide an updated market position across the area of search. CGC, which is the most active locally commercial property advisor, confirmed that the market is very active around the area, reporting over 1.9m ft² (over 176,000m²) of mixed employment space in need currently on the area within ten miles from Junction 8 in M11 (Stansted Airport’s commercial catchment).
- 4.18 In terms of storage and distribution space solely, there is currently a live requirement of at least 140,000m² based on CGC’s report. On an average of 40% plot ratio, this is translated to a need for at least 35 ha of distribution (i.e. B8 Use Class) employment land. In addition, the occupancy rates are very high across this area and vacancy rates are estimated at around 0.6%.
- 4.19 Market intelligence supports that there is demand that can easily justify any speculative development of distribution or warehousing scheme across this active market. This is also supported by the reporting solid developer interest across the area of search, with increasing enquires for land available to be sold for commercial and particularly distribution purposes.
- 4.20 The market also reports that competing uses, and particularly housing, occupy usually any unused sites around the area that could potentially be developed for employment as they can simply offer higher value and yields. Therefore, employment land around the area is very constrained with a large live shortfall. This argument was also presented within the evidence base of the withdrawn local plan, namely the Property Delivery Advice Study in 2016.
- 4.21 On a similar basis, landowner preferences are typically for any consented land for employment be built out with modern warehouses as this creates higher yields than open storage facilities. This is the key reason why Wren has been searching for available and deliverable land around the area for at least four years.
- 4.22 The development progress and occupancy rates of the Vision Stansted Site represents how responsive the market is in any speculative development around the area. This development lies east of the proposed site adjacent to Start Hill employment area. Once Vision Stansted was proposed for allocation, immediately an application made for its development, approval granted, and the development started. The site was fully built out and occupied by businesses within 3.5 years from the very first application submission (UTT/14/0138/FUL).
- 4.23 The area’s attractiveness for the logistic sector is also evident across all the employment evidence studies. The 2017 ELR particularly stated (in paragraph 9.8.19) that
“Start Hill south of the B1256 adjacent to the Stansted Distribution Centre offers a strategic location within close proximity to both Stansted Airport and Junction 8 of the M11 which would be very attractive to potential warehouse and distribution occupiers”.
- 4.24 As a result, there is currently an unsatisfied demand for distribution uses of at least 35ha of land evident across the area. There are strong grounds to support that this area around Stansted differs from the rest of the commercial market across Uttlesford, as there is strong demand for large size transport and storage facilities driven by the area’s high accessibility to the national motorway network and its access to London’s market. In addition, the proximity to the airport offers agglomeration economy opportunities for the airport’s supply chain businesses. All these factors make the area the most attractive location across the District and the wider functional economic market area, which is part of, for logistic operations.

Employment land supply in Uttlesford and FEMA

- 4.25 The updated analysis of employment land demand prepared above is compared against the latest supply position to identify evidence of demand and supply mismatch in this section.

- 4.26 This section establishes the type and quantum of available land for distribution uses, the scale of extant permissions which could be seen as contributing towards the District's requirements and those locations within the District as a whole that have historically been most successful in sustaining employment and particularly distribution activity.
- 4.27 The withdrawn Local Plan proposed to allocate the North Stansted Employment Area (referred as North Side) at Stansted Airport as its one major employment centre of 55ha. This site represents over 68% of the identified supply across the District. In addition, Chesterford Research Park is the second proposed key allocation in Uttlesford, focusing on Research and Development (R&D) activities (29.4ha) predominantly in relation to office floorspace.
- 4.28 Other additional employment land within the Draft Plan related to consented schemes on smaller industrial estates and premises in Saffron Walden (11.83 ha) and Great Dunmow (2.1 ha). In addition, provision for local employment was proposed for the three Garden Communities however details were not included within the withdrawn plan.
- 4.29 It is evident that the new commercial supply across the District is concentrated in mainly two locations, one focusing on R&D uses at Chesterford and the other on a mixed use, but industrial and warehousing-led, scheme in Stansted Airport. The single ownership status of these sites, - and particularly considering North Side - puts employment provision at risk, in general and they are not considered as a sustainable form of employment allocations aiming to fulfil short-, medium- and long- term needs.
- 4.30 In quantitative terms, distribution sector represents around 81.5% of the demand across the District (as evident within West Essex and East Hertfordshire EDNA) while the emerging supply for distribution uses represents 68%. This figure relates to the overall demand and supply without factoring in the time-sensitivity and deliverability elements of the supply position.
- 4.31 The withdrawn local plan identified a shortfall of 10.2 ha; however, if we factor in the disproportionate employment provision and the deliverability within the plan period there is a significant outstanding demand that has not been accommodated through the Withdrawn Draft Plan.
- 4.32 In order to accommodate the District's distribution needs, the Council should ensure that North Side becomes available in short term and new sites should come forward around the M11/A120 logistics corridor to fulfil outstanding storage and distribution needs. But this does not address the immediate requirements, particularly for open storage.
- 4.33 Across FEMA, it is evident that there is a mismatch in terms of demand and supply for transport and storage uses. Harlow is undeniably a constrained area. The Pre-Submission Draft suggests that the three existing employment areas, namely the Pinnacles, London Road and Templefields will be retained and enhanced for a mix of office, industrial and warehouse uses and other associated activities. East Road in Templefields (ED1-3) of 2.2ha is the only allocation that can accommodate additional warehousing requirements.
- 4.34 Epping Forest Submission Version Draft Local Plan identifies three new employment allocations (open B Class) of a total of 21ha. These relate to 10 ha in North Weald Airfield (NWB.E4), 1 ha in Galley Hill Road Industrial Estate (WAL.E6) and 10 ha in Land North of A121 (WAL.E8). In addition, Policy E1 states that proposals for the redevelopment, renewal, intensification, or extension of existing employment sites will be encouraged with emphasis on two existing areas, namely Oakwood Hill Industrial Estate (6.1 ha) and Buckingham Court (0.62 ha).
- 4.35 The adopted East Hertfordshire Local Plan allocates five employment areas totalling 19-20 ha for any employment activity. These include North of Buntingford Business Park (BUNT3, 3 ha),

Bishop's Stortford North (BISH3, 4ha), Bishop's Stortford South (BISH5, 4-5ha), North and East of Ware (WARE2, 3ha) and Gilston Area (GA1, 5ha).

4.36 The following section scrutinises the supply provision within the area of search and as a result those sites and allocations mentioned above that are located within the area of search have been reviewed in detail below.

Land availability within the area of search

4.37 Two proposed allocations of the Uttlesford Draft Plan (Withdrawn) fall within the area of search, namely the land north of Stansted (i.e. North Side) and the proposed allocated land at the south edge of Great Dunmow.

4.38 Wren's current Stansted depot is located in the heart of the **North Side** area in Stansted, which was one of the key proposed allocations of the withdrawn plan. Policy SA1 proposed to allocate the North Stansted Employment Area (55ha) for B1, B2 and B8 uses. The policy notes that there are contamination issues at the site and that the site is adjacent to listed buildings at Bury Lodge. There are also accessibility issues at the site that need to be addressed prior to the commercial development. In addition, Policy SP11 states that development at London Stansted Airport would need to be "*directly related to airport use of development, apart from within the North Stansted Employment Area*", showing the intention to accommodate also non-airport related employment uses on-site.

4.39 The original intention of the operator was to continue being located within this area. However, Wren was only able to secure a leasing expansion up to 2023 and the site is not available in the medium to long term for open storage facilities. The agent acting on behalf of the site's new owner has indicated that the intention is to redevelop the site following the expiry of this lease, reflecting the ambitions for the North Side area to provide a modern business park, comparable in broad terms to the Manchester Airport business park (Airport City) and operations relevant to Wren's nature will not be accommodated within the redevelopment.

4.40 From the owner and developer's perspective, an open-storage facility has limited financial interest at North Side and for this reason it does not intend to facilitate these uses. The new park will offer up to a million square foot of modern warehousing units. The CGC advise whilst there might be possibility that land on the edges might be available for "lower" value uses, this is something that will only emerge in the longer term, and is not available now to meet Wren's business needs.

4.41 The second proposed allocation within the area of search in the withdrawn plan is the 2.1 ha employment area in **Great Dunmow**. Firstly, the site is too small to accommodate the future growth requirements and any scope to expand beyond 2ha. However, we have sought to assess in detail this allocation as it falls within the area of search.

4.42 The site is part of a consented residential-led scheme expanding across 20 ha of land at Smiths Farm (UTT/13/1684/OP) located south of the settlement. The scheme's permission was granted in November 2014 and since then various applications for discharge of conditions and reserved matters have been decided showing that the development will soon commence. The allocated employment area is adjacent to the southern edge of the existing industrial location (EMP1) and the area is also part of the residential allocation (GtDun8) within the withdrawn Reg19 Draft Policies Map.

4.43 With regards to the employment space, the planning statement stated at paragraph 5.20:

"This will be delivered as part of Phase 2. Separate access will be provided to the employment units from the existing access off Chelmsford Road. In order to retain flexibility at this stage, it

is proposed that the employment space could be used for a range of uses, including B1, B2 and/or B8 uses. The specific floorplates and design of the buildings will be operator led. It is anticipated that a series of two storey buildings [our emphasis] will be provided with associated car parking and landscaping. Full details of this element will be submitted pursuant to a Reserved Matters application at a later date.”

- 4.44 It is clear based on these proposals that the intention of the developer is to provide higher value employment floorspace, probably within the former B1 Use Class. It is widely appreciated that any investor would seek higher value for the consented land. As mentioned above, this is a key constraint for identifying available land for the operator’s open-storage facilities.
- 4.45 A further constraint for Great Dunmow site is its availability within the short-term period of three years. In particular, an application for reserved matters approval for Phase 2 has been submitted since November 2017 with still an awaiting decision (UTT/17/3106/DFO). It should be noted that the allocated industrial area has been excluded from the site’s boundary in relation to this submission. This indicates that the development of commercial floorspace will be further delayed and probably will be developed once Phase 1 and the residential parts of Phase 2 are completed. As explained previously, the operator could not wait for this length of time.
- 4.46 The 2016 Property Delivery Advice Study assessed the deliverability of various sites including the proposed commercial development in Great Dunmow by liaising with various stakeholders and market experts. With regards to the site, the study stated that the scheme is *“likely to provide B-class components for B2 or B8 similar to that in nearby industrial estates, including small manufacturing and engineering firms, auto-servicing and construction supplies. This will be low impact businesses with links to the Great Dunmow community”*.
- 4.47 In addition, with regards to the site’s deliverability, the study stated (Table 7, p13) that:
“Proponent reports delays in the overall project but remains confident of delivering the employment uses in the short to medium term. Proponent states that they are prepared to deliver commercial units speculatively. Strong interest in the commercial land by potential occupiers suggests that even if the proponent sells this land that it would be taken-up and developed in a short timeframe. Regular monitoring of this project is recommended to ensure delays are not overly long and that the development of the commercial land is not being proceeded in an attempt to convert to residential”.
- 4.48 Four years after this study and six years after the outline permission, there is still no planning activity in relation to the commercial uses in this site. Without speculating any further development about the site, we believe that there are strong grounds to argue that the site cannot be available within the appropriate timescales to enable Wren to move to the site and therefore the site is considered unavailable for the operator’s purposes.
- 4.49 In addition to these two allocations, we have scrutinised land availability within the search area. Table 4.1 shows all the sites of suitable size to accommodate the operator’s needs that have been reviewed. A threshold of 2ha has been applied which represents the minimum and immediate spatial requirements, however it is understood that a scope to expand to 3ha should be possible to accommodate Wren’s future growth plans.

Table 4.1 Review of land availability in the area of search (sites of 2ha or over)

Local authority / Site Reference	Site name and address	Notes	Agent comments	Review of availability and suitability
Harlow ED1-3	East Road, Templefields, Land South of Tesco Store East Road Harlow Essex CM20 2TL	<p>Draft allocation (2.2ha), Planning permission HW/FUL/17/00460 (granted 26 July 2018) Applicant: Chancerygate (Livingston) Ltd – occupier Travis Perkins</p> <p>Erection of Four New Industrial Buildings, Sub-divided into Nine Units, to Provide 4,841 m² of B1c and B8 Use (Units 1-8) and 1,391 m² of Builders' Merchants (sui generis) for Display, Sale Storage of Building, Timber and Plumbing Supplies, Plant and Tool Hire Including Outside Display and External Storage, B1c, B2 and B8 Use (Unit 9), Together with Access, Parking and Landscaping. Variation of conditions and reserved matters submitted in July and September 2019, respectively.</p>	<p>This site has now been developed out and largely sold by Chancerygate. Developments there have insufficient yard or parking available to accommodate Wren's needs.</p>	<p>Not available. The scheme has been completed and occupied. The remaining units are not suitable for the purposes of Wren.</p>
Harlow	The Pinnacles, New Frontiers Science Park Coldharbour Road Harlow Essex CM19 5AD	<p>Existing employment site with planning permission (HW/OUTAM/17/00372) granted subject to S106 on 23 October 2018. New Frontiers Science Park, applicant: Public Health England. Outline Application for up to 115,200 m² of Offices, Research and Development Laboratories (Class B1), Ancillary Facilities, New Accesses, Landscaping, Parking and Ancillary Works. Reserved matters applications between 2018 and September 2020.</p>	<p>This is the designated HQ for Public Health England and will be fully occupied by them and by associated enterprises. There will not be surplus land for distribution type uses.</p>	<p>Not available. This is an R&D development.</p>

Local authority / Site Reference	Site name and address	Notes	Agent comments	Review of availability and suitability
Harlow	London Road CM17 9NA	Existing employment site. The proposed Main Modification (MM5) to the draft Local Plan states that the Enterprise Zone at London Road will facilitate the Research and Development Sector and other associated activities. Employment uses which are not related to R&D will be resisted. This relates to KAO Park (London Road South site within the Harlow Enterprise Zone), which will comprise the creation of a 32,000 m ² data centre complex (www.kaodata.com) combined with the development of a 20,000 m ² business park providing grade A office space and Harlow's Science Park (London Road North) and Templefields North-East. Land appears for sale in Rightmove (https://www.rightmove.co.uk/commercial-property-for-sale/property-96132098.html)	This site is owned and promoted by Harlow Town Council for High Technology companies serving the Bio Science industry in particular consent will not be forthcoming for purely B8 uses.	Not available. R&D sector needs will be accommodated on-site.
Epping Forest NWB.E4	North Weald Airfield CM16 6ND	Draft allocation (10ha). No planning applications yet. As we understand the land is owned by the Council. A planning Brief for the North Weald Airfield Masterplan Area has not yet been published. We have reviewed the draft planning brief (https://www.efdclocalplan.org/wp-content/uploads/2019/04/EB142B-North-Weald-Airfield-Masterplan-EFDC-Cabinet-Report-11th-April-2019.pdf) which identifies the 10ha land west of the runways. A masterplan will be commissioned. A key objective will be to create an area with a vibrant mix of employment uses (B1, B2, B8), adding value and increased employment options for the local community of North Weald Bassett, the wider Epping Forest District and beyond and there is also the possibility for accommodating high quality and sustainable new offices for Epping Forest District Council within the site.	The Council's aspirations for this site are for a "High Quality" business park and we understand from discussions with them that there are a range of constraints which would indicate development is unlikely to be forthcoming in the foreseeable future.	The site will be available for employment but in long term and it is envisaged that the new council offices will be located there together with aviation related uses. As a result, this site is not considered available for the purposes of an open storage facility.

Local authority / Site Reference	Site name and address	Notes	Agent comments	Review of availability and suitability
Epping Forest WAL.E8	Land North of A121 Dowding Way Waltham Abbey EN9 3AD	Draft allocation. Registered Planning application (EPF/1413/18) since June 2018. Applicant: Next plc and Trinity Hall. Full planning application for erection of 1 no. warehouse with ancillary accommodation (Class B8), including access and servicing arrangements, car parking and landscaping, roof-mounted photovoltaic array and associated works including new vehicular access to A121 (phase 1), gatehouse and sprinkler tanks; outline planning application for up to 22,733 m ² of employment floorspace (Classes B1(c), B2 and B8) with all matters reserved (phase 2)	This development application, on Green Belt land, is primarily for a purpose-built distribution warehouse for Next PLC of 616,421 ft ² approximately. The development, if granted, is subject to a pre let/sale to Next and as such the site is not currently available. If consent is not granted it will remain an unallocated Green Belt site and as such would not be available for our client use.	This site falls south of Waltham Abbey, it is just on the edge of the appropriate time distance catchment (parameters 1 to 5) but out of the final area of search. However, we have sought to include it due to availability constraints around the area. Next plc has interest on the site to create a regional distribution unit. The site is not considered available for Wren's operations.
East Hertfordshire BISH3	Bishop's Stortford North CM23 2JN	Allocation for mixed use development including c.2,500 homes and c.4ha employment land. The consented scheme (3/13/0804/OP) provides up to 2,200 new homes, two local centres and primary schools, 21,000 m ² of employment, and around 59 ha of multifunctional greenspace and landscape habitats. In terms of employment, the scheme includes commercial floorspace (Use Class B1 a, b and c) and retail (Use Classes A1, A2, A3, A4 and A5). Parts of land advertised for sale in Rightmove (https://www.rightmove.co.uk/commercial-property-for-sale/property-86761730.html , https://www.rightmove.co.uk/commercial-property-for-sale/property-85171912.html , https://www.rightmove.co.uk/commercial-property-for-sale/property-86061166.html)	This is a mixed-use site on the edge of a major residential site which is split into four areas, the first of which comprising 3.2 acres has been sold to Frontier Estates PLC for a mixed-use development incorporating healthcare, Care Home, retail and day nursery. The remainder is split into three parcels of land with a range of outline consent for employment within the former B1c and B1a/ B1b, an elderly care and restricted living development and a local centre comprising retail, healthcare, day nursery and A3/A4 accommodation which render it unsuitable for B8 development. In addition, the planned estate roads will not allow a single site of sufficient size to provide for Wren's needs.	The site is not considered available or suitable for Wren's purposes as no distribution provision has been proposed. In addition, there is no site of a size sufficient to accommodate the occupier's needs.

Local authority / Site Reference	Site name and address	Notes	Agent comments	Review of availability and suitability
East Hertfords hire BISH5	Bishop's Stortford South CM23 4AD	<p>Allocation and Permission granted on 19 December 2019 (3/18/2253/OUT).</p> <p>Hybrid Planning application comprising:</p> <p>(i) A full application for 142 dwellings (class C3) including affordable homes, plus associated accesses, landscaping, open space and infrastructure works (development zone A) , and a north/south primary route; and</p> <p>(ii) An outline application, with all matters reserved except access, for approximately 608 (Class C3) including affordable homes, a care home (Class C2) , up to 4 ha of employment land (classes B1, B2, B8, Sui Generis (car showroom)), a local centre including up to 1,000 m² for retail (Class A1), and up to 2,200 m² for other uses (Classes A2, A3, A4, A5 and D1), a primary school (Class D1) up to 3 forms of entry and including early years facilities, a secondary school (Class D1) up to 8 forms of entry, open space including equipped areas for play, sustainable drainage systems, landscaping and all associated infrastructure and development.</p> <p>With regards to employment proposals for 4ha, the application supporting documents assumed a provision of 5,333m² of B1, 5,333m² of B2 and 5,333m² of B8.</p>	<p>This site is now under offer to a major commercial developer for a mixed E class employment site comprising a range of buildings - there will not be a likelihood of sufficient land becoming available for B8 use and the developers intention is to construct buildings to a c 40% plot ratio, thus precluding yard areas, sufficient to meet the needs of their Client. In addition, Planning Authority see this as a gateway site for the town and are consequently seeking a high standard of building design which again would preclude open storage facilities.</p>	<p>The site is not considered available for Wren's purposes as the scheme relates to E Class use and it is seen as a gateway to the town.</p>

Local authority / Site Reference	Site name and address	Notes	Agent comments	Review of availability and suitability
East Hertfords hire GA1	The Gilston Area CM20 2QS	<p>Allocation and Outline planning submission (3/19/1045/OUT) with awaiting decision - all matters reserved apart from external vehicular access for the redevelopment of the site through the demolition of existing buildings and erection of a residential led mixed use development comprising up to 8,500 residential homes including market and affordable homes; retirement homes and extra care facilities; a range of community uses including primary and secondary schools, health centres and nursery facilities; retail and related uses; leisure facilities; business and commercial uses; open space and public realm; sustainable urban drainage systems; utility and energy facilities and infrastructure; waste management facilities; vehicular bridge links; creation of new vehicular and pedestrian accesses into the site, and creation of a new vehicular, pedestrian and cycle network within the site; improvements to the existing highway and local road network; undergrounding and diversion of power lines; lighting; engineering works, infrastructure and associated facilities; together with temporary works or structures required by the development.</p> <p>In terms of commercial uses, the ES states that "a range of retail and related services, such as local neighbourhood shops, professional services, food and drink venues and local employment for Small and Medium Enterprises (SME) will be provided for each village".</p>	n/a	The site is not available as it accommodates residential-led schemes with moderate employment provision associated with small industrial units to accommodate SME needs, retail and neighbourhood shopping uses.

Local authority / Site Reference	Site name and address	Notes	Agent comments	Review of availability and suitability
Epping Forest	Canes Lane near J7 of M11- Storage Parking Open Land Hard Standing Ground Commercial CM17 9LD	<p>Gumtree advert: https://www.gumtree.com/p/commercial-property-to-rent/storage-open-storage-land-commercial-parking-hard-standing-ground-to-let-m11-harlow-junction/1388901890</p> <p>May be adjoining to Canes Farm, Canes Lane or Harlow Garden Centre. Looks to be too small from images on Gumtree. Available to let for £1,000pcm.</p> <p>No proposed allocations in this area.</p> <p>A search of the Council's online planning database indicates no planning history.</p>	From the details provided this would appear to be a site of no more than 5,000 ft ² and thus is clearly insufficient in terms of scale for the Wren operation.	The site is not considered suitable or available for Wren's purposes as it seems insufficient in terms of scale to accommodate Wren's facilities.
Uttlesford	Elsenham, South/West of Elseham Hall CM22 6DP	<p>Approximately 3.51 acres (1.42 hectares) of undulating Grade 3 pasture land. The land may be accessed via both the main entrance to Elsenham Hall and Church Lane, using a right of access over a privately-owned track. The land would be suitable for equestrian and amenity uses and is situated in a rural location on the edge of the well-served village of Elsenham.</p> <p>No associated planning activity.</p>	This site is an agricultural site with limited access unsuitable for HGV access and within the curtilage of a listed building, as such it is considered unsuitable for the proposed use and unlikely to obtain a commercial consent.	This is not suitable in terms of size, restricted access and adjacent to not compatible uses.
Uttlesford	Woodgates Farm, Gaunts End, North east of Stansted Airport CM22 6DS	<p>UTT/18/1365/FUL for the erection of two units totalling 32,000 m² for B Uses. 20,000 m² has been pre-let and only 12,000 m² is available. Completion was anticipated by 2020.</p>	This site is now fully let and there is no remaining availability.	Not available.

Local authority / Site Reference	Site name and address	Notes	Agent comments	Review of availability and suitability
Uttlesford	Part of Smiths Farm Great Dunmow Adjacent to A120 Great Dunmow CM6 1LW	Site of c.6 acres (2.1 ha) allocated for employment use adjacent to A120 on the Edge of Great Dunmow forms part of a hybrid application comprising c 350 homes, school retail and care home/extra care facility (see paragraphs 4.41 to 4.48)	This site has been part of a wider employment allocation for over 20 years and has yet to come forward due to a number of issues. The road access requires a new gyratory system off the A120 which is not economic in relation to purely the employment site, the wider mixed use site is embroiled in land ownership and joint venture litigation which has stalled development over a number of years , according to the Developers there is no prospect of this site coming forward in isolation in the foreseeable future and, if development were to proceed this would only be possible for a high value development of maximum site coverage due to the abnormally high infrastructure costs associated with the project.	As explained in paragraphs 4.41 to 4.48, the site is not considered available for Wren’s purposes.
Uttlesford	Land East of Braintree Road Great Dunmow East of Great Dunmow adjacent to Dunmow Park	<p>Planning Permission (Subject to S106) -</p> <p>A full application for Refuse Lorry Depot, Classic Car storage and restoration business, flexible office space, enhanced public open space, cycle and pedestrian uses and associated development.</p> <p>This is a site of 8.6 ha proposed for a Council Depot, office and light industrial and workshops, including Classic Car Restoration and Storage Business.</p>	<p>Recently granted consent subject to a S106 agreement on the basis of a relocation of the Council Depot and the construction of speculative and owner-occupied office and industrial units subject to S106.</p> <p>The Council have two other sites in mind and, if they do not decide to take up this opportunity it may present a possible alternative however the costs associated with infrastructure, requiring a new roundabout on the Braintree Road and extensive flood mitigation works would probably make development for a storage related use unviable.</p>	Not available.

Source: Uttlesford, Epping Forest, Harlow, East Hertfordshire policy evidence and planning registers, Rightmove, Zoopla, Gumtree (Accessed in October 2020), Coke Gearing Consulting (November 2020) – Lichfields Analysis

4.50

As presented above, we have reviewed a total of fourteen sites (i.e. thirteen listed in the table and the North Side allocation presented in paragraphs 4.38 to 4.40) across the area with a size

considered in general suitable to meet at least the immediate requirements of the occupier (i.e. 2ha or more), together with all Uttlesford's employment allocations.

4.51 It is evident that there is no other available site within the area of search, apart from the proposed site, to accommodate the immediate and future spatial and locational requirements of Wren Kitchens.

4.52 According to NPPF Paragraph 82, local authorities should consider the specific locational requirements of distribution sector (together with other sectors) at a wide range of scale and in suitable accessible locations in decision making. In addition, NPPF Paragraph 80, states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Therefore, the occupier should expect that their growth plans and any scope for expansion would be accommodated as well.

4.53 In this context and having reviewed any available supply, the proposed site at Tilekiln Green is the only suitable, available and deliverable site within the area that can accommodate the specific locational requirements for Wren's distribution needs.

Summary

4.54 This section presents the increased demand for transport and storage across the area of search and the FEMA as a whole. It is evident that there is currently a live unsatisfied requirement of at least 35ha for distribution purposes.

4.55 The analysis underpins the argument that the area around Stansted differs from the rest of the commercial market across Uttlesford with strong demand for large size transport and storage facilities and has a regional focus. The area's high accessibility, its access to London's market and the proximity to the airport drives the demand currently for strategic distribution uses and make the area one of the most attractive location for logistics across the FEMA.

4.56 In terms of supply, it is evident that the current allocations across the District and FEMA, as a whole, provide supply disproportionately to the requirements for transport and storage. The supply position in Uttlesford is mainly concentrated in two locations, one focusing on R&D uses in Chesterford and the other is Stansted Airport's North Side site with an open B Class Use allocation. The single ownership status and the long-term deliverability puts employment provision in jeopardy, and it is not considered able to fulfil the current, short- and medium-term needs of the area.

4.57 The section, finally, scrutinises the land availability within the area of search to explore any alternative options that the occupier might have to consider in order to accommodate their locational requirements. The detailed analysis of the fourteen alternative sites, including allocations and site promotions, highlights the constrained deliverable supply across the area for the bespoke locational distribution requirements of Wren.

4.58 The evidence clearly demonstrates that the only suitable, available and deliverable site within the area of search to accommodate the specific locational requirements for Wren's distribution needs is the proposed site.

5.0 **Economic Benefits Assessment**

5.1 This section presents the potential economic benefits that could be generated by the proposed development at the land west of Tilekiln Green.

5.2 For the purposes of this assessment it has been assumed that if the development will not commence in the proposed site, the occupier would cease operations, through relocation to somewhere outside the District which would not meet its business needs, and resulting in a loss of the current employment on-site of 130 jobs.

Baseline and Context

5.3 We have initially established the baseline economic context for the proposed open storage distribution facility, highlighting the key economic trends across the District.

Employment

5.4 In 2019, there were c.46,000 jobs in Uttlesford District. The transport and storage sector was the largest broad industry group in terms of employment, accounting for 9,000 jobs (19.6%), followed by professional, scientific and technical (5,000 jobs, equivalent to 10.9%) and accommodation and food services (4,000 jobs, equivalent to 8.7%)².

5.5 The transport and storage sector had a significantly higher representation in Uttlesford (19.6%) than in the East of England region (4.9%) and Great Britain (4.8%)³.

Economic Activity

5.6 In the 12 months to June 2020, the average economic activity for residents aged 16 to 64 in Uttlesford was 80.9%, which was equal to the East of England's equivalent (80.9%) but higher than the national rate of 79.1%⁴.

5.7 Over the ten-year period from 2010 to 2020, economic activity in Uttlesford increased slightly from 80.8% to 80.9%, compared to a higher level of increase in the East from 78.7% to 80.9% and an increase in Great Britain from 76.3% to 79.1%⁵.

Unemployment

5.8 In the 12 months to June 2020, Uttlesford had an average unemployment rate of 2.4%, which was lower than in the East (3.5%) and Great Britain (3.9%)⁶.

5.9 Over the ten-year period from 2010 to 2020, unemployment in Uttlesford decreased from 4.5% to 2.4% (-47%), compared to a similar decrease in the regional (-47%) and national (-49%) averages.

5.10 Claimant data for November 2020 shows that 2,120 Uttlesford residents were claiming Universal Credit, representing 3.8% of residents aged 16 to 64, which was lower than the regional (5.4%) and national (6.3%) averages⁸.

² ONS Business Register and Employment Survey (2019)

³ ONS Business Register and Employment Survey (2019)

⁴ ONS Annual Population Survey (12 months to June 2020)

⁵ ONS Annual Population Survey (12 months to June 2010 to 12 months to June 2020)

⁶ ONS Model-based estimates of unemployment rate (12 months to June 2020)

⁸ ONS Claimant count (November 2020)

- 5.11 In terms of unemployment-related benefits, 310 Uttlesford residents were claiming Jobseekers Allowance (JSA). Of these claimants, 230 (74.1%) were seeking work in the transport and storage sub-sectors⁹.

Occupations

- 5.12 Uttlesford's resident population occupies more highly skilled jobs than the regional and national average. In the 12 months to June 2020, a total of 50.1% of employed residents in Uttlesford held jobs in standard occupational classification (SOC) 2010 major groups 1-3¹⁰, which was higher than in the East (47.8%) and Great Britain (48.4%)¹¹.
- 5.13 Uttlesford had a lower proportion of employed residents (19.7%) in SOC major groups 7-9¹² than the East (22.4%) and Great Britain (22.6%) averages during this period¹³.

Qualifications

- 5.14 Uttlesford's resident population is more highly qualified than the regional and national average. As of December 2019, a total of 44.4% of residents in Uttlesford aged 16 to 64 held qualifications of NVQ level 4 (equivalent to degree level) and above, which was higher than the average for the East of England (36.8%) and Great Britain (40.3%)¹⁴.
- 5.15 Similarly, Uttlesford had a lower proportion of residents aged 16 to 64 with no qualifications (6.9%) than the average for the East of England (7.2%) and Great Britain (7.7%)¹⁵.

Earnings

- 5.16 Median gross annual earnings for full-time workers that were resident in Uttlesford in 2020 amounted to £36,515, which was 10.8% higher than in the East (£32,944) and 15.6% higher than in Great Britain (£31,596)¹⁶.
- 5.17 Full-time workers in Uttlesford had lower median earnings, at £32,533 but these earnings were still higher than in the East (£31,044) and Great Britain (£31,589)¹⁷.
- 5.18 The difference between workplace and resident earnings suggests that some Uttlesford residents commute outside of the local authority area to work in locations where wages are higher, leading to residents earning more on average than those working within the District.

Table 5.1 Median gross annual earnings

	Uttlesford	East	Great Britain
Median gross annual earnings by residence	£36,515	£32,944	£31,596
Median gross annual earnings by workplace	£32,533	£31,044	£31,589

Source: ONS Annual Survey of Hours and Earnings (2020)

⁹ ONS Jobseekers Allowance claimants for those seeking work in the transport and storage sub-sectors (2-digit SIC codes 82 and 91) (November 2020).

¹⁰ SIC Groups 1-3: Managers, directors and senior officials; professional occupations; and, Associate professional and technical occupations

¹¹ ONS Annual Population Survey (12 months to June 2020)

¹² SIC Groups 7-9: Sales and customer service occupations; Process, plant and machine operatives; and, Elementary occupations

¹³ ONS Annual Population Survey (12 months to June 2020)

¹⁴ ONS Annual Population Survey (12 months to December 2019); This represents the latest available data.

¹⁵ ONS Annual Population Survey (12 months to December 2019); This represents the latest available data.

¹⁶ ONS Annual Survey of Hours and Earnings (2020)

¹⁷ ONS Annual Survey of Hours and Earnings (2020)

- 5.19 Median gross earnings for full-time workers in the transportation and storage sector in the East of England was £32,571 per annum in 2020¹⁸, so this was similar to the average across all sectors in Uttlesford.

Deprivation

- 5.20 Local levels of deprivation are measured by the Index of Multiple Deprivation (IMD) 2019. This uses a range of data to rank areas in seven categories or “domains” ranging from income to health, which are then combined to create a multiple deprivation score for each area.
- 5.21 In relation to the overall IMD 2019, Uttlesford ranked 295 out of the 317 local authorities in England, where a rank of 1 is the local authority with the highest proportion of the population living in the most deprived neighbourhoods. Hence, Uttlesford is within the 90th percentile for deprivation, i.e. it is one of the 10% least deprived local authorities in the nation.

Employment Deprivation

- 5.22 Uttlesford ranked 314 out of the 317 local authorities in terms of the employment domain, indicating that it is one of the 1% least deprived in this regard.

Income Deprivation

- 5.23 Uttlesford ranked 308 out of the 317 local authorities in terms of the employment domain, indicating that it is one of the 3% least deprived in this regard.

Construction Impacts

Capital Investment

- 5.24 Information provided on behalf of the applicant indicates that the total capital investment associated with the proposed development will be in the region of £10 million, and it is estimated that construction will take place over an estimated period of 12 months.

Direct Employment

- 5.25 Using labour coefficients from the HCA Calculating Cost per Job Best Practice Note (2015), it is anticipated that **116 gross direct FTE construction jobs** will be supported by the proposed development over the course of the construction phase.
- 5.26 It is acknowledged, however, that levels of employment on-site will not remain uniform throughout this period. Rather, they will change over time to reflect different stages of the build, some of which will, inevitably, be more labour intensive than others.
- 5.27 The extent to which construction opportunities created by the proposed development will be taken up locally cannot be estimated with any certainty until contracts have been let. However, it would be reasonable to expect that at least a proportion of the construction jobs would be taken up by the local workforce.

Indirect and Induced Employment

- 5.28 In addition to direct employment opportunities, construction activity also involves purchases from a range of suppliers (e.g. concrete, steel), some of which will be based in the local area. In turn, these suppliers purchase from other businesses further down the supply chain. Consequently, a number of indirect jobs would be supported in companies supplying construction materials and equipment.

¹⁸ ONS Annual Survey of Hours and Earnings (2020)

5.29 Workers spending their wages in local shops, bars, restaurants and other facilities will help to support the creation of induced jobs. Therefore, businesses in the local area and beyond are also expected to benefit to some extent from temporary increases in expenditure linked to the direct and indirect employment effects of the construction stage.

According to the ONS Detailed Input-Output Tables (2020) the construction industry has an indirect and induced employment FTE multiplier of 2.11. As a result, it is anticipated that the proposed development could support an **additional 129 spin-off FTE jobs** annually over the construction phase (in addition to the 116 FTE jobs set out above)¹⁹. These jobs would be distributed across the UK economy.

5.30 The total construction employment would therefore be **245 FTE jobs**.

Economic Output

5.31 The construction phase of the proposed development will also make a contribution to local economic output, as measured by Gross Value Added (GVA), a commonly used measure of productivity and economic performance.

5.32 The capital spending associated with the proposed development could deliver **£11.4 million of direct GVA** for each year of construction²⁰, whilst the spin-off impact would equate to an additional **£13.6 million of GVA** per annum during the build period²¹. It should be noted that not all of the GVA impact will be retained locally.

5.33 The total GVA produced would therefore be **£25.0 million**.

Operational Impacts

Direct Employment

5.34 It is estimated that the new Stansted depot will support a total of **c.196 FTE jobs**, including approximately six office staff jobs, namely a transport manager, transport supervisors and a driver trainer. The rest of the jobs will relate to drivers and porters (also referred as drivers' mates). All of the jobs are anticipated to be full-time.

5.35 Given that the existing site at the North Side will no longer be available to Wren Kitchens after the current lease expires in 2023, all of the existing 130 full-time jobs at this site are due to be lost. Hence, for the purposes of assessing the economic benefits of the proposed development, all of the c.196 FTE jobs at the new depot are assessed as net employment benefit. This will include the 130 jobs safeguarded together with the extra 66 FTE jobs. The generation of the additional 66 jobs reflects the ability to expand on the proposed site and increase the scale of the facility's operations.

5.36 As discussed in Section 3, based on the distribution of North Side depot's workforce, it is anticipated that the majority of jobs at the new depot will be taken by people living locally – with the vast majority within 10km of the site.

¹⁹ This figure draws upon research undertaken by CEBR on behalf of the National Housing Federation (NHF) in 2019 which indicates that the construction industry has an indirect and induced employment multiplier of 1.23 for the UK (i.e. 1 job supports 1.23 spin-off jobs).

²⁰ This figure is based upon data published by Experian in March 2020, which indicates that the construction sector generates an average GVA of £98,052 per FTE construction job in the East of England.

²¹ This figure is based on research undertaken by CEBR on behalf of the NHF (2019) which indicates that £1 of GVA would support £1.26 of indirect GVA across the UK.

Indirect and Induced Employment

- 5.37 As with the construction jobs, the new jobs created at the proposed development will support indirect employment in the supply chain and also induced employment as a result of staff spending their wages in the local area.
- 5.38 Based on relevant multipliers in the HCA Additionality Guide, Fourth Edition 2014 it is estimated that the proposed development would support **86 indirect and induced FTE jobs** in the East of England region, of which **57 FTE jobs** will be based in Uttlesford²².

Economic Output

- 5.39 Based on March 2020 Experian data, it is estimated that the c.196 direct FTE jobs at the new depot would contribute £9.6 million in GVA to the regional economy²³.
- 5.40 In addition, it is estimated that the indirect and induced jobs will contribute an additional £4.2 million in GVA to the region, of which £2.8 million will be in Uttlesford²⁴.
- 5.41 Therefore, the total GVA produced by the new depot would be **£13.8 million** in the East of England region, of which **£12.4 million** will be in Uttlesford.

Fiscal Impacts

Earnings and National Insurance/Income Tax

- 5.42 Based on data supplied by the occupier on the earnings of existing staff at the current depot, the c.196 jobs at the new depot are anticipated to generate minimum average annual earnings of £37,052 per job²⁵, with total earnings of c.£7.3 million across all staff.
- 5.43 These average earnings are higher than the median for full-time workers in the transportation and storage sector in the East of England in 2020 (i.e. £32,571 per annum).
- 5.44 The c.196 FTE jobs at the new depot will also generate National Insurance and PAYE tax revenue of c.£3.1 million per annum²⁶.

Local Authority Revenue Benefits

- 5.45 The proposed facility is estimated to generate a business rates contribution of £60,000 per annum. This estimation is based on the current depot's business rates contributions with the assumption that the Rateable Value of the new facility will be increased proportionally to the floorspace increase as both the market and 'use of space' will remain the same between the current and the proposed sites.

²² The relevant indirect/induced multipliers for B2/B8 workspace is 1.29 for the local area and 1.44 for the region (i.e. every 1 direct job supports an additional 0.29 indirect/induced jobs in the local area and 0.44 indirect/induced jobs in the region).

²³ This figure is based upon data published by Experian in March 2020, which indicates that the distribution sector generates an average GVA of £49,100 per FTE job in the East of England.

²⁴ Based on multipliers from the HCA Additionality Guide, Fourth Edition 2014

²⁵ Including salary and any bonus. This average wage figure is based on earnings for drivers and does not include earnings of office staff (i.e. transport manager, transport supervisors and driver trainer).

²⁶ Based on HMRC National Insurance and tax rates for 2020/21, including employer and employee National Insurance contributions and PAYE income tax.

Wider Impacts

Employment Needs

- 5.46 The proposed development responds to the specific locational requirements of the distribution sector, and the operator in particular, in an accessible location, thereby complying with NPPF paragraph 82.
- 5.47 As detailed in Section 4, the current supply of employment land in Uttlesford is not considered sufficient to accommodate the current, short- and medium- term needs of the District, particularly in relation to distribution uses. The (withdrawn) Draft Plan recognised the area's strong distribution activity and commercial attractiveness but missed the opportunity to address the upcoming (and current) pressures creating the risk of the area to be developed organically. As a result, more sites particularly around the southern parts of the District are needed to come forward for distribution uses in the emerging Local Plan.
- 5.48 The analysis in Section 4 shows an increased demand for transport and storage across the area of search, which relates to a current unsatisfied requirement of at least 35ha for distribution purposes (as in November 2020). The proposed depot will therefore contribute towards accommodating this identified need.

Economic Objectives

- 5.49 The proposed depot will contribute towards local, regional and national economic objectives.
- 5.50 In particular, the Uttlesford Economic Development Strategy and Action Plan for 2018-21 period identifies logistics as an opportunity sector across the local economy. This is supported by the importance of the transport and storage sector in terms of employment in Uttlesford, as identified in the baseline analysis.
- 5.51 Similarly, the Greater Cambridge Greater Peterborough and South East Strategic Economic Plans and adopted and emerging Local Industrial Strategies highlight the importance of the transport and storage sector in their economies and provide the evidence to support increased employment land provision across their boundaries.
- 5.52 At a national level, the NPPF sets out at paragraph 80, at the beginning of Chapter 6, "*Building a strong, competitive economy*":
- "Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."*
- 5.53 The proposed depot represents a key opportunity to support economic growth and productivity by providing for the specific needs of a growing business. Its potential to support employment will also contribute to keeping Uttlesford's unemployment and deprivation levels low.
- 5.54 Whilst it is anticipated that a significant proportion of the jobs at the proposed depot will be taken by existing employees (c. 130 employees) at the North Site, there is the potential for some of these jobs (up to 66 jobs) to be filled by unemployed residents currently claiming benefits.
- 5.55 As identified in the baseline analysis, a total of 230 JSA claimants in Uttlesford were seeking work in the transportation and storage sector in November 2020. This indicates a strong degree of alignment between the new jobs to be offered and the needs of those that are currently unemployed. As a result, there is a potential to decrease JSA claims in Uttlesford by 29%.
- 5.56 If the proposed development does not proceed, none of the identified benefits will come forward, as no suitable alternative site has been identified.

Summary

Baseline

5.57 The baseline economic conditions in Uttlesford are summarised below:

- 1 The transport and storage sector was the largest broad industry group in terms of employment in Uttlesford in 2019, with a significantly higher representation than in the East of England region and Great Britain;
- 2 The average economic activity rate for residents aged 16 to 64 in Uttlesford in the 12 months to June 2020 was equal to the East of England's equivalent, but higher than the national average;
- 3 The average unemployment rate in Uttlesford was lower than in the East and Great Britain;
- 4 Uttlesford's resident population occupies more highly skilled jobs than the regional and national average and is more qualified than the regional and national average;
- 5 Earnings for Uttlesford residents and those that work in Uttlesford are higher than the regional and national average;
- 6 Uttlesford has very low levels of deprivation. In terms of the overall deprivation ranking, Uttlesford is one of the 10% least deprived local authority areas in England; in terms of employment, it is one of the 1% least deprived and in terms of income, it is one of the 3% least deprived.

Economic Benefits

5.58 The proposed depot will generate the following key quantifiable economic benefits:

Construction phase

- 1 116 gross direct FTE construction jobs;
- 2 129 gross indirect/induced FTE jobs; and,
- 3 £11.4 million direct GVA and £13.6 million indirect GVA.

Operational phase

- 4 196 direct FTE jobs at the site, representing 130 safeguarded jobs and 66 jobs from expansion;
- 5 86 indirect and induced FTE jobs in the region, of which 57 FTE jobs will be based in the local area;
- 6 £13.8 million total GVA from operational jobs in the region, of which £12.4 million will be in Uttlesford.

Fiscal impacts

- 7 Total earnings of £7.2 million across all operational staff; and,
- 8 National Insurance and PAYE tax revenue of £3.1 million per annum.
- 9 Business rates contribution of £60,000 per annum.

5.59 The proposed development will also support wider economic benefits, in terms of:

- 1 Responding to the specific locational requirements of the distribution sector and the operator in particular; and,

- 2 Contributing towards local, regional and national economic objectives to support economic growth, with particular recognition of the local importance of the transport and storage sector.

5.60 If the proposed development does not proceed, none of the identified benefits will come forward, as no suitable alternative site has been identified and the existing Wren operations at Stansted will cease.

6.0

6.0 Conclusions

- 6.1 This employment report provides the evidential base to support the development proposals for an open storage distribution facility in land west to the Tilekiln Green, adjacent to Junction 8 of M11, in Uttlesford. The applicant - FKY Limited - is the owner of the site but the distribution facility will be operated by Wren Kitchens.
- 6.2 The site extends to c 5 ha of which around 3 ha is proposed to be developed. The proposed development involves the creation of an open-land distribution facility which will consist mainly of an area of hardstanding for heavy goods vehicles, parking space for urban vehicles and lorries, employees' parking, two portacabins for office uses and circulation space. The remaining land which expands around the edges of the developed area, will be predominantly woodland or areas of open land where new tree planting is proposed. This aims to minimise any potential nuisance to neighbouring uses.
- 6.3 The operations on-site will include decanting storage containers from larger vehicles onto smaller ones through “*demountable operations*” and fall entirely within the storage and distribution (B8) Use Class.
- 6.4 Wren Kitchens currently operates from an existing site at the North Side, Stansted, but the lease expires by 2023 and the new owners of the site do not intend to make the site available for Wren beyond that point.

Policy considerations

- 6.5 The policies within the NPPF, and in particular Paragraph 82, emphasise in need for planning policies and decisions to recognise and address the specific locational requirements of different sectors, including storage and distribution operations, at a variety of scales and in suitably accessible locations. NPPF provides the main policy considerations in relation to the proposed development as the adopted Local Plan (back in 2005) has now very limited weight.
- 6.6 The proposed site was submitted in the Call for Sites exercise and assessed by the SLAA. That study concluded that the site was considered both achievable and available, but unsuitable as “*development on this site would not contribute to sustainable patterns of development*”. Lichfields considers that the location of the site would not represent an unsustainable pattern of development, given the specific needs of distribution sector across the area and the weight that NPPF gives to accommodate those specific locational requirements of the sector, combined with the moderate scoring of the site in terms of Countryside Protection Zone's purposes (2016 CPZ Review).
- 6.7 The Reg. 19 Draft Local Plan (withdrawn) proposed a net requirement for 10.2ha of industrial and distribution land for 2016-33 plan period, based on the ELR Update and the West Essex and East Hertfordshire EDNA. In terms of distribution uses, both evidence and Draft Plan presented a combined industrial and distribution figure (B2 and B8 Use Classes). However, all the evidence, together with the proposed policy justification, clearly stated that demand was driven by transport and storage rather than industrial sectors. A net requirement of 22ha for industrial and distribution activities was identified for Uttlesford and a total of 65ha for the West Essex and East Hertfordshire FEMA as a whole.
- 6.8 The policy implications in relation to the deliverability of allocations within the plan period (to 2033) are questioned. At least 30% of the proposed allocations (i.e. Chesterford Research Park) would be delivered towards the end of the plan period. In addition, the Draft Plan (withdrawn) proposed to allocate 55ha of employment land at North Side as one major employment centre,

however this cannot be considered developable in short and medium terms due to safeguarded policies, ownership constraints and accessibility issues.

- 6.9 North Side represents over 68% of the identified supply across the District. In addition, the Draft Plan proposed Chesterford Research Park (29.4ha) as the second key allocation in Uttlesford, focusing on R&D activities solely. Other additional employment land related to consented schemes on smaller sites in Saffron Walden (11.83 ha) and Great Dunmow (2.1 ha). Finally, provision for local employment was proposed for the three Garden Communities, however details were not included within the Draft Plan, and that lack of details was also highlighted in the Inspectorate's comments.
- 6.10 It is evident that the proposed allocations across the District provide an employment supply position disproportionately to the identified requirements for transport and storage that relate to 81.5% of the demand. In addition, Uttlesford proposed supply position is considered in jeopardy due to the single ownership status and long-term deliverability of the two main allocations.
- 6.11 That supply position is not considered able to accommodate the current, short- and medium-term needs of the District particularly in relation to distribution uses. Although the Draft Plan recognised the area's strong distribution activity and commercial attractiveness, it missed the opportunity to address the upcoming (and current) pressures creating the risk of the area to be developed organically. As a result, more sites particularly around the southern parts of the District should come forward for distribution uses in the emerging Local Plan.

Specific locational requirements

- 6.12 The North Side area, where the current depot is located, was proposed for redevelopment through both the Local Plan (withdrawn) and the Airport's SPD. It was also subject of a scoping opinion request for the site's redevelopment dated in 2017 relating to an open-B Class scheme.
- 6.13 The original intention of Wren was to continue being located within the North Side area. However, the site's new owner clarified that there are ambitions for new development over the coming years and that open storage operations like Wren's would not be accommodated within the redevelopment. There might in future be opportunity to accommodate lower value uses (such as open storage) on the edges of the development dependent on the market, but this could only be confirmed following the development's commencement in around 10-year time. Wren's immediate occupation ceases in 2023 and there is no prospect of retaining occupation beyond this.
- 6.14 In this context, Wren has looked at options for a new facility to meet its current and future business needs. The first part of this report sets out why the proposal site has been identified as the only suitable site that matches the occupier's bespoke locational requirements. This is based on a series of parameters, including: driving distance regulations; the role of the depot within the emerging southern network of Wren's depots; the servicing catchment area of the proposed facility; the strategy in servicing London with electric fleet; the labour catchment area; Green Belt and environmental constraints; and other qualitative factors.
- 6.15 The area of search based on these parameters expands across M11 from Saffron Walden south of M11 Junction 9 to Junction 7 (Harlow Junction), including at the north west quadrant Bishop Stortford and the areas extending across A120 to the village of Little Hadham. At north east, it expands across A120 including Stansted Airport and Great Dunmow (east edge). The north edge of this quadrant is Widdington Village in Saffron Walden. Around Junction 7 of M11, the area of search crosses A414 to Roydon, covering the town of Harlow entirely. At the north of this section the area expands to the settlements of Hunsdon and Widford (Figure 3.8).

Demand and supply position in the area of search

- 6.16 The analysis shows an increased demand for transport and storage across the area of search, which relates to a current unsatisfied requirement of at least 35ha for distribution purposes (as in November 2020). In contrast to the rest of the District, the area of search has a very strong demand for large size transport and storage facilities with a regional focus. The area's high accessibility, its access to London's market and the proximity to the airport drives the demand currently for strategic distribution uses.
- 6.17 We have scrutinised suitability and availability across all the sites within the area of search that have an area of above 2ha representing the immediate spatial requirements for Wren's purposes. However the analysis recognises that there is a scope for an expansion to at least 3ha to accommodate the company's future plans. A total of 14 sites have been assessed. This list of sites (see paragraphs 4.38 to 4.40 and Table 4.1) includes all the allocations, planning consents, any land advertised for commercial purposes (within the most recognised commercial databases) and any site that has been recommended from the estate agents within the area of search. The analysis was then supplemented and sense-checked with market intelligence and commentary provided by locally active agents.
- 6.18 The detailed analysis highlights the constrained supply across the area for the bespoke locational distribution requirements of Wren. None of the assumed available sites is considered available in reality, due to various reasons including mainly the fact that the consented sites have already an identified occupier. In addition, the open storage facilities associated with Wren's occupation are considered as a lower commercial value use and as such the developers tend to resist making sites available for these purposes, when warehousing and higher value operations are possible in a strong market.

Proposed site and locational advantages

- 6.19 The proposed site at Tilekiln Green falls within the area of search and offers the necessary permanent solution for Wren's distribution operations. We have analysed all the site's characteristics that make the proposed site the most suitable location to accommodate the bespoke locational distribution requirements of the occupier. These include:
- 1 Accessibility: The site is highly-accessible with good condition links to the motorway network, enabling compliance with driving regulations.
 - 2 Proximity to the market it serves: The site is appropriately located in relation to the market it serves and the market that it will serve once the southern depot network is completed.
 - 3 Land availability: It is evident that there is shortfall of distribution land against the demand for logistics in this location. Having assessed in detail the availability around the area of search, the proposed site is the only available option immediately to accommodate Wren's requirements.
 - 4 Suitable size: The size and layout of the site allow for flexibility in its configuration so that it can accommodate the size and facilities required to serve its market.
 - 5 Labour accessibility: The site lies in the heart of the current Stansted depot's labour catchment area and it is expected to minimise impacts in terms of additional training and recruitment costs.
 - 6 Neighbouring uses: Overall there are compatible uses in the surroundings of the site. The exception is the three residential buildings at the south east of the site, however the design could enable any mitigation to minimise nuisance. Of note, these residences are within the airway and just over 1km away from the airport's runway. Therefore, in planning terms these residential premises are considered incompatible to the wider environment.

- 7 Policy support: Although the site is not allocated for employment, it is part of the A120/M11 growth corridor that is supported for strategic employment development through the overarching strategies. Currently, the site is subject to Policy S8 The Countryside Protection Zone in the 2005 Local Plan, albeit the CPZ review scored the site's contribution on the CPZ purposes as 'moderate'. In any case, this designation has limited weight due to the fact that the Local Plan was adopted 15 years ago and does not account for current business needs or national policy. NPPF paragraph 82, which urges planning decisions to address the specific locational requirements of distribution operations at a variety of scales and in suitably accessible locations is a key policy determinant for considering the site for Wren's proposals.

Economic Benefits

- 6.20 There are economic benefits associated with the proposed development that will be generated in Uttlesford and the wider area.
- 6.21 During the construction phase of 12 months, a total of 116 gross direct FTE construction jobs and 129 gross indirect/induced FTE jobs will be created. This will enhance construction employment across the area in a temporary basis. During this phase, £11.4 million direct GVA and £13.6 million indirect GVA will be generated in Uttlesford and regionally.
- 6.22 Once the facility is operational, a total of 196 FTE jobs will be accommodated. This would comprise safeguarding the 130 jobs that are associated with the current facility and creating 66 new jobs from the expansion of activity allowed by the larger facility. It is important to highlight that post-2023 the business will need to re-locate from its current facility at North Side. If its needs are not accommodated in the proposed development, this would result in a loss of 130 jobs in Uttlesford. Therefore, the analysis considers that there is a net employment gain of 196 FTE jobs in Uttlesford arising from the proposed development.
- 6.23 In addition, 86 indirect and induced FTE jobs will be created in the region, of which 57 FTE jobs will be based in Uttlesford. All these new jobs will contribute to the District's relatively low unemployment rates. Moreover, the direct net additional jobs (i.e. 66 jobs) could possibly reduce the JSA claimants in relation to transport and storage sector by 29%. The economic output during the operation phase is estimated at £12.4 million per annum in Uttlesford and £13.8 million per annum across the East of England.
- 6.24 Furthermore, based on the occupier's salary estimations, a total of £3.1 million per annum will be generated for National Insurance and PAYE tax revenue purposes. The new facility will also provide a business rates contribution of over £60,000 per annum.
- 6.25 Finally, the proposed development will also support wider economic benefits, including contributing to local, regional and national economic objectives to support economic growth, with particular recognition of the local importance of the transport and storage sector. In addition, the development will contribute to accommodating the distribution needs across the District.

Summary

- 6.26 In conclusion, this report presents initially the specific locational requirements of Wren's distribution operations in the defined area of search and how the proposed site responds fully to these bespoke requirements, in contrast to the rest of the emerging supply for employment uses. This report also quantifies the economic benefits that would be generated by the development, which if do not proceed, none of the benefits will come forward and in addition an employment loss of 130 jobs will be resulted, as no suitable alternative site has been identified across the area.