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To: [REDACTED]
Cc: [REDACTED]
Subject: Sheffield Plan representation submission - Orgreave Park
Date: 20 February 2023 12:16:45
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[Orgreave Park - Representation to the Sheffield Plan.pdf](#)
[Boost for Logistics.pdf](#)
[Location Plan including wider client ownership.pdf](#)

Good afternoon,

Please find attached our representations to the emerging Sheffield Plan Publication Draft (reg 19) on behalf of Norfolk Estates. The document pack includes:

- Representations to the Sheffield Plan, with promotion of the site: 'Orgreave Park' with the location Plan shown within the representations;
- Demand For Logistics study to support the logistic need in Sheffield with context given to Orgreave Park;
- Location Plan showing the submission site in a red line, and the wider client ownership in a blue line.

It should be noted the site was previously submitted at previous part of the Local Plan as 'Hall Farm' (ref: SE-2). However, in response to the site's proximity to the AMID, and the objectives and evidence provided as part of the Local Plan process, the site is now proposed as solely employment use. We believe the proposed development could provide meaningful support to Sheffield's promotion of advanced manufacturing on a underutilised site which has previously been using for coal mining. Further information is contained within the representations.

Please can you confirm receipt of these representations.

We want to take a collaborative approach with Sheffield City Council to help realise its objectives. Should you have any questions please feel free to get in contact with Adam Key or me at Savills Leeds office.

Kind regards,

Ben

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Orgreave Park, Handsworth, Sheffield

Representations to Sheffield Local Plan – Publication Draft (Regulation 19), on behalf of Norfolk Estates



Orgreave Park, Handsworth, Sheffield

Representations to Sheffield City Council Publication (Reg 19) Draft Consultation



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1. Introduction

- 1.1. These representations have been prepared by Savills (UK) Ltd on behalf of Norfolk Estates in relation to the Sheffield City Council (SCC) Emerging Local Plan - Publication Draft (Reg 19) consultation.
- 1.2. These representations are submitted only in the context of the land at Orgreave Park, Handsworth; formerly known and submitted as 'Hall Farm'. It is important to note that Norfolk Estates' vision for this land is evolving and now likely to focus on employment development closely linked to the Harworth Advanced Manufacturing Park (AMP) situated in close proximity. This change in approach is explained further in Section 2 of these representations.
- 1.3. It is considered this land is sustainable for an employment development capable of delivering advanced manufacturing as an extension to the existing Advanced Manufacturing Park in Waverley or in synergy with the wider AMID (Advanced Manufacturing Innovation District). The scheme could be delivered in the medium term and could provide a meaningful contribution to the identified employment needs and help support advanced manufacturing industry in Sheffield.
- 1.4. This representation seeks to comment on the Publication Draft of the Local Plan and demonstrates how the site constitutes sustainable development in the context of the National Planning Policy Framework (NPPF).
- 1.5. The Site extends to approximately 64.98 hectares (160.57 acres) in size. A site Location Plan is shown in **Appendix A**.
- 1.6. Please note these representations have been prepared in accordance with paragraph 35 of the NPPF which states plans must be:
 - a. **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b. **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c. **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d. **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.7. The following sections of these representations are arranged as follows:
 - Section 2: Changing Approach
 - Section 3 : Representations on the Publication Draft Plan; and
 - Section 4: Summary and Conclusions.

2. A Changing Approach – Employment Opportunity

- 2.1. Norfolk Estates are seeking to bring Orgreave Park forward for employment purposes. It is considered the land has significant potential to contribute towards the employment and economic objectives of the Sheffield City region with potential future linkage and opportunities in conjunction with the closely situated Advanced Manufacturing Park (AMP) and AMID.
- 2.2. Norfolk Estates has historically been a pioneer for economic growth in Sheffield through the development of land for steel, industry and coal which paved the way for the development of Sheffield. Norfolk Estates wish to continue to support the economic progress of Sheffield and see advanced manufacturing as a key element of this.
- 2.3. It is acknowledged this is a change in approach from the more recent promotion of the land for residential purposes. Norfolk Estates consider that the site could make a greater contribution to the needs of Sheffield in employment use and also recognises the emerging strategy of the new Local Plan contains a focus on the provision of new housing development on previously developed land.
- 2.4. We realise this changed approach is relatively late in the Local Plan process (Reg19), but consider there is still the opportunity for meaningful engagement with Sheffield City Council (SCC) and other key stakeholders as part of the current Local Plan process. We intend to further these discussions in the coming months.

Key Location

- 2.5. Orgreave Park comprises 64.98ha of land which lies adjacent to the Advanced Manufacturing Park (AMP) in Waverley. It is the only available land capable of providing a significant extension to this part of the innovation district. Clustering of certain industries (including high tech, engineering, and logistics activities) can play an important role in supporting collaboration, innovation, productivity, and sustainability, as well as in driving the economic prospects of the areas in which they locate¹.
- 2.6. The Waverley AMP is almost completely constructed and without further expansion land, advanced manufacturers may not be able to find suitable sites within the Sheffield Region, forcing them to relocate elsewhere. This threatens the long-term viability of advanced manufacturing in Sheffield.
- 2.7. As evidenced in the Employment Land Review² there have been several unfulfilled enquires by advanced manufacturing companies who have not been able to relocate to Sheffield due to a lack of available sites. However, Orgreave Park offers the opportunity to expand the current AMP and offer land available for new employment units which can specialise in advanced manufacturing.

¹ National Planning Practice Guidance, Housing and Economic Needs, Paragraph 32

² Employment Land Review Update for Sheffield (September 2021), Table 5.6

- 2.8. Moreover, the logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities³. Orgreave Park offers the chance to provide modern, energy efficient buildings of the highest specification. The lack of the highest quality units in Sheffield is particularly acute with 18 out of the 21 large B8 units in Sheffield built pre-2008⁴, causing a hinderance to economic growth as well as meeting the climate emergency. The allocation of new land allows new buildings to be constructed to the exact specification of manufacturers, proving more attractive to prospective future occupiers than the reuse of existing industrial land.

Background and Planning History

- 2.9. Orgreave Park comprises land formerly used for coal mining and waste storage which has been restored to agricultural use, although remains designated as 'land predominantly in urban use'⁵. The site is surrounded by built development on all sides and is just 3 miles from Junction 34 of the M1, accessed via Sheffield Parkway. This supports the PPG's objective for strategic employment facilities to have good access to strategic transport networks⁶.
- 2.10. The site is situated in Southeast Sheffield and is 5.5km east of Sheffield city centre, and 5.5km south of Rotherham town centre. The site is located 700 metres away from Portland Business park, which contains a range of services including restaurants and a supermarket; as well as being 500 metres from St Joseph's Primary School.
- 2.11. The site abounds the boundary between Sheffield and Rotherham District with the Waverley Advanced Manufacturing Park and housing development, adjacent to the north, separated by a rail line. To the south lies residential development. Dore House Industrial Estate is located south east of the site separated by the B6066. The site also adjoins the Sheffield Parkway to the west, which leads onto the M1. Overall, the site is considered to be in a mixed use area.
- 2.12. There is no relevant planning history on the site. However, a complete site history of the site since 1855 is shown in Table 2.1 below which demonstrates the site has been partially used for coal mining and waste storage.

³ National Planning Practice Guidance, Housing and Economic Needs, Paragraph 31

⁴ Sheffield Logistics Study (2022), Icen Projects, paragraph 5.7

⁵ Agricultural Land Classification Yorkshire and The Humber (ALC003)

⁶ Planning Practice Guidance, Housing and Economic Needs Assessment, paragraph 31

Orgreave Park, Handsworth, Sheffield

Representations to Sheffield City Council Publication (Reg 19) Draft Consultation



Date (Scale of plan)	Land Use
1855 (1:10,560)	The site comprises open fields. A track is shown crossing southwest northeast through the centre of the site. 'Finch Well' is recorded at the centre of the south western boundary of the site, a second 'Well' is recorded in the centre of the site. A wooded area, which is part of 'High Field Spring' runs along the northern section of the north eastern boundary. An old sandstone quarry is shown close to the northeast boundary. The site is bound to the northeast by a railway, to the northwest and southwest by fields and to the southeast by Orgreave Lane.
1905 (1:2,500)	'Allotment Gardens' are recorded on site adjacent to the northeast boundary. No other major changes to the site.
1923 (1:2,500)	'Finch Well' and the second 'Well' at the centre of the site are no longer recorded. There is now a 'Tramway' shown to run through the northwest corner of the site connecting Handsworth Colliery and High Hazel pits.
1935 (1:10,560 and 1:2,500)	'Allotment Gardens' adjacent to the northeast boundary are no longer recorded on site. A 'Sports Ground' is recorded in the north western corner of the site. A drift (mine tunnel entrance) is shown in the northern corner of the site, inferred to be entering the ground in a southerly direction.
1955-1957 (1:2,500)	The spoil/refuse heap from Handsworth Colliery now encroaches on the site across the south western boundary. 'Opencast Coal Workings' are recorded along the northeast boundary of the site. The drift is now larger and has a track entering it.
1967-1968 (1:10,000)	The spoil heap from Handsworth Colliery has increased in size towards the northwest. The drift is no longer shown in the northern corner of the site.
1981 (1:10,000)	The 'Opencast Coal Workings' are no longer recorded along the northeast boundary of the site, the 'Tramway' is now shown to be a track or path.
Post 1981	No significant changes are noted within the site boundary.

Table 2.1 – Orgreave Park site history – produced by WSP

2.13. The site affords the opportunity to regenerate this underutilised site in an area traditionally associated with coal mining and quarries.

3. Representations on the Sheffield Local Plan – Publication Draft (Regulation 19)

- 3.1. These comments are made following a full review of the relevant consultation documents. We have focussed our comments on key draft policies in the context set out previously in these representations.
- 3.2. We object to and also have concerns in respect of a number of policies outlined within the Publication Draft Plan and consider that significant amendments are required for the new Local Plan to be found sound.
- 3.3. Our comments relating to each of the following draft policies are considered in the below:

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations:

- Policy SP1: Overall Growth Plan;
- Policy SP2: Spatial Strategy;
- Policy SA5: Southeast Sheffield;
- Policy H1 Scale and Supply of New Housing;
- Policy T1: Enabling Sustainable Travel;
- Policy IN1: Infrastructure Provision;

Part 2: Development Management Policies and Implementation:

- Policy EC1: Development in the Advanced Manufacturing District;

Evidence Base:

- Employment Land Review (2020) and Update (2021) – Lichfields;
- Sheffield City Region Strategic Economic Plan (2021-2041)- Sheffield City Region;
- Sheffield Logistics Study (2022) – Icen Projects;
- Whole Plan Viability Assessment (2022) – HDH;
- Sheffield Green Belt Review (2020) and Addendum (2022) – Sheffield City Council;
- Housing, Economic Growth and Demographic Modelling Report (2021) – Icen Projects;
- Sheffield Housing and Economic Land Availability Assessment (2022) – Sheffield City Council;
- Sheffield Transport Strategy (2019) – Sheffield City Council and WSP;
- Landscape Character Assessment Addendum (2022) – Sheffield City Council;

Policy SP1: Overall Growth Plan - objection

- 3.4. Policy SP1 intends to realise the vision for Sheffield which promotes growth to achieve an '*economically stronger, fairer, more inclusive and sustainable city*'.

- 3.5. Policy SP1 outlines a target to deliver a minimum of 35,530 dwellings (2,090 per annum), and 195.5 hectares of employment land, of which 170 ha is for industrial land (12.9 hectares per annum, of which 10 hectares is industrial (non office / retail) and 2.9 hectares for office development) over the plan period (2022 to 2039). The housing and employment need progressed within the Plan is commented on further within these representations. In addition, the growth plan seeks economic growth through the Advanced Manufacturing District (AMID) and Broad Locations of Growth. It also sees the protection of all non-previously developed Green Belt land.

Industrial Employment Land Requirement

- 3.6. Having reviewed the Employment Land Review (ELR) (2021), and the Sheffield Logistics Study (2022) which underpins the employment land requirement set out in the Local Plan, Savills believes this requirement is too low.
- 3.7. The ELR models demand for employment for a 20 year plan period 2018 - 2038 across 11 scenarios. The preferred scenarios are based on a localised model of labour supply that models the level of job growth that might be expected to be sustained under a series of demographic projections aligned with the Government's Standard Methodology for calculating housing need. This methodology of assessment is contradictory to Planning Practice Guidance (PPG) which requires "*analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities*"⁷. Moreover, the NPPF⁸ requires planning policies to provide "*a rapid response to changes in economic circumstances*". Of recent significance was the Covid Pandemic which accelerated a need in the logistics and distribution sectors, for which there is still a huge shortage of employment land across the country, but is particularly acute in Sheffield with just 0.8 years of industrial supply⁹.
- 3.8. The ELR gives an estimate of future demand for employment land in Sheffield between 176 and 242 ha over a 20 year period. The Publication Draft gives an industrial development land requirement of 10 hectares per annum which equates to 170 ha over the seventeen year plan period.
- 3.9. We find the following flaws in the ELR methodology:
1. **It uses demographic and labour market projections to project market metrics instead of looking at the market directly.** In England, market demand and supply data are readily available via commercial real estate agents, planning application information, Authority Monitoring Reports and commercial databases. Given the wealth of market information available it is unclear as to why the ELR has relied on projections of indicators which are correlated, but not directly translatable into market data itself.
 2. **It doesn't take a sub-regional approach.** Local authorities are administrative geographies that rarely correspond to functional economic market areas Sheffield and Rotherham share a single FEMA, consistent with a single travel to work area. Therefore market demand should be first assessed at this level.

⁷ Planning Practice Guidance, Housing and Economic Needs, Paragraph 31

⁸ National Planning Policy Framework, Paragraph 82d

⁹ Employment Land Review Update for Sheffield (September 2021)

3. **It doesn't account for suppressed demand.** The ELR notes that the lack of appropriate stock is causing many firms to instead locate into other less desirable areas outside Sheffield. The ELR doesn't quantify this 'suppressed demand' but suggests that the Council may wish to commission a further strategic study to quantify the need for strategic B8 across the wider sub region. We consider suppressed demand to be significant given the level of supply shortages over the last decade and estimate that if more land had been made available, demand would have been 28% higher over the last decade.
 4. **It doesn't account for E-commerce growth.** The ELR recognises the limitations of the chosen model to capture the need for large scale logistics and account for the shift towards e commerce.
 5. **We do not agree with the recommended office/I&L split.** The final recommendation on the 25% office 75% I&L split is also inconsistent with the original outputs of the chosen scenarios where it was in the region of 15-16%.
- 3.10. Similarly, the Sheffield Logistics Study makes similar incorrect assumptions because it bases the employment requirement based on past trends without accounting surprised demand. In particular, the logistic study notes there is an increase in logistic land over historic demand, yet fails to account for this in its final conclusions.
- 3.11. The study concludes a mid-point, between historic net absorption (2012-2021) of 69.6 ha and recent net absorption (2017-2021) of 86.8 ha, as the method of calculating the demand for B8 logistics¹⁰. As this data demonstrates, there is 65.65% (13.13% annual) increase in demand between 2012-2017 and 2017-2021; rather than account this significant increase in demand, due to structural shifts, in projecting the future employment requirement, the report instead takes the midpoint. We consider this to be flawed.
- 3.12. The report also fails to account for the suppressed demand for logistics development in Sheffield due to a shortfall of logistics developments post 2008, of which just 3 large scale B8 developments have been built¹¹. Whilst the report acknowledges this shortfall, it does not account for it within the suggested employment requirement.
- 3.13. Savills has prepared an Industrial Investment Strategy report which accompanies these representations (**Appendix 3**) which instead provides more accurate estimate for the employment land required in Sheffield. The report first estimates the historic demand at the Functional Economic Market Area (FEMA) which is based on average net absorption across the FEMA, which between 2011 and 2021; this was at 543,100 sq ft per annum.
- 3.14. The methodology then estimates the level of suppressed demand at FEMA level of which has been severely constrained since 2014 due to a lack of employment land causing businesses to search for premises outside of Sheffield District due to a lack of availability of units. The methodology estimates a suppressed demand across the FEMA at 151,900 sq.ft per annum. If more land had been made available for I&L uses, demand would have been 28% higher over the last decade. This suppressed demand is combined with the historic demand to give a total annual future demand of 695,000 sq.ft per annum.

¹⁰ Sheffield Logistics Study (2022), Icen Projects, paragraph 5.14

- 3.15. Next, there is an adjustment for the increase in online sales of which these sectors account for 39% of leasing demand, corresponding to 179,500 sq.ft, and totalling 874,500 sq.ft in total. Once this is combined across the plan period of 17 years it yields a total demand of 14.87 million sq.ft across the FEMA. Once a safety margin equivalent to 5 years' worth of demand is factored in, equivalent to 3.5 million sq.ft, it yields a total demand of 18.37 million sq.ft.
- 3.16. Applying a 35% plot ratio to the estimated demand translates into 487.6 ha of land required across the FEMA in the Plan period.
- 3.17. To apportion demand at FEMA level to Sheffield, we consider the role played by Sheffield in the FEMA from a demand perspective. We calculated historic and suppressed demand for Sheffield and compared to the level estimated across the FEMA. This analysis suggests that Sheffield accounts for 44% of FEMA demand; however, Sheffield accounts for just 13% of the future development pipeline¹².
- 3.18. Applying this demand share to the estimated demand at FEMA level, we expect 206.04 ha of I&L land to be needed in Sheffield over the next 17 years. This is 36 hectares higher than Local Plan requirement.

Recommendation 1: Reassess the employment land need to include suppressed demand factors and future trend analysis.

Quantity of Employment Land Allocated

- 3.19. Savills have concerns with the amount of employment land allocated for growth. The Preferred Options of the Local Plan, presented to Full Council on the 2nd February 2022, stated an economic need for 207ha of new employment land, 12ha more than Sheffield have allocated for development. The employment need should be viewed as a minimum for calculating the employment land requirement. However, the current allocations do not even meet this requirement which Savills argue should be higher. This restriction on the employment land supply will reduce the choice, flexibility and competition of the market which will reduce the attractiveness of new employers moving into Sheffield. This will restrict economic growth through the reducing the effectiveness of the logistics supply chain, which has a knock on effect onto other businesses within the locality and thus onto consumers¹³.
- 3.20. Furthermore, the proposed employment land supply largely relies on the recycling of existing employment sites rather than new allocations to meet the employment land supply. The majority of allocated sites have been identified as existing employment land within the UDP (1998), many of which have existing employment development on. This therefore does not constitute new employment land and including it as such constitutes 'double counting'. Thus, sites which are existing employment sites should be removed as 'allocations' and instead referred to as existing employment land suitable for intensification.

¹¹ Sheffield Logistics Study (2022), Icen Projects, paragraph 5.7

¹² Sheffield Logistics Study (2022), Icen Projects, page 66.

¹³ Planning Practice Guidance, Housing and Economic Needs Assessment, Paragraph 31

- 3.21. In particular, allocations such as NES01, which totals 13.32ha, has already received full planning permission and has largely been built. It can therefore not count as new development, but instead as existing development.
- 3.22. By comparison, Calderdale Metropolitan Borough Council’s new Local Plan has a separate distinction between its allocation of new sites in the Plan, and the intensification of land within ‘Primary Employment Areas’. Through the examination process Calderdale was required to provide enough employment land through new sites to meet the 73 hectare requirement for the Borough. The additional extra supply through the intensification of ‘Primary Employment Areas’ was seen as an addition to the requirement.
- 3.23. Calderdale’s Local Plan underwent consultation on its Main Modifications in August 2022, and is due to be adopted in the immediate future. It therefore serves as a contextual recent example of an Examination of a Local Plan in Yorkshire and it is suggested that Sheffield follows a similar methodology if it wishes to be found ‘sound’ under examination.
- 3.24. Tables 3.1 – 3.6 below summarises sites allocated for either ‘General Employment’ or ‘Industry’ in each Sheffield Area which should not be included as new employment land. It should be noted that there are no employment allocations in either South Sheffield, Chapeltown/High Green, or Southwest Sheffield.

Table 3.1 Employment Allocations Northwest Sheffield

Site Allocation Reference	Site Area (ha)	Reason
NWS01	4.58	Existing Employment Land
NWS02	4.04	Existing Employment Land
NWS03	2.62	Existing Employment Land
NWS05	0.74	Existing Employment Land
NWS06	0.64	Existing Employment Land
NWS07	0.42	Existing Employment Land
Northwest Total	13.05ha (84.7% of allocated land)	

Table 3.2 Employment Allocations Northeast Sheffield

Site Allocation Reference	Site Area (ha)	Reason
NES01	13.32	Development under construction/built
NES02	0.67	Existing Employment Land
NES05	2.01	Existing Employment Land
NES07	1.27	Full Planning Approved, under construction
Northeast Total	17.27ha (50.5% of allocated land)	

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Table 3.3 Employment Allocations Southeast Sheffield

Site Allocation Reference	Site Area (ha)	Reason
SES01	1.29	Existing Employment Land
SES02	1.1	Existing Employment Land
SES04	9.41	Existing Employment Land
SES05	3.75	Existing Employment Land
SES06	0.57	Existing Employment Land
SES07	0.54	Existing Employment Land
Southeast Total	16.6ha (70.6% of allocated land)	

Table 3.4 Employment Allocations East Sheffield

Site Allocation Reference	Site Area (ha)	Reason
ES01	17.1	Existing Employment Land, Full Planning Approved
ES02	9.98	Existing Employment Land
ES03	3.24	Existing Employment Land
ES04	1.22	Existing Employment Land
ES05	1.05	Existing Employment Land
ES06	19.53	Existing Employment Land; and Development under construction/built
ES07	3.38	Existing Employment Land
ES08	3.26	Existing Employment Land
ES09	2.14	Existing Employment Land
ES10	1.6	Existing Employment Land
ES11	1.52	Existing Employment Land
ES12	1.36	Existing Employment Land
ES13	1.1	Existing Employment Land
ES15	0.89	Existing Employment Land
ES16	0.68	Existing Employment Land
ES17	0.65	Existing Employment Land
ES18	0.55	Existing Employment Land
ES19	0.45	Existing Employment Land
East Total	99.41ha (99.1% of allocated land)	

Table 3.5 Employment Allocations Stocksbridge/Deepcar

Site Allocation Reference	Site Area (ha)	Reason
SD01	0.89	Existing Employment Land
Northeast Total	0.89ha (100% of allocated land)	



Table 3.6 Industrial Allocations Central

Site Allocation Reference	Site Area (ha)	Reason
SU01	0.05	Under Construction
KN01	1.5	Existing Employment Land
KN02	0.06	Existing Employment Land
CW01	0.12	Existing Employment Land
Northeast Total	1.73ha (100% of allocated non-office employment land)	

3.25. As Tables 3.1 - 3.6 demonstrate the vast majority of employment allocations are on existing employment land and thus their development would not increase the total amount of employment land. It is therefore considered that within national guidance and recent examples of Public Examinations that almost entirely relying on the recycling of existing employment land is not sound plan making in line with paragraph 11 of the NPPF.

Recommendation 2: Remove committed developments and sites that are already employment land from new allocations.

Recommendation 3: Allocate more land for industrial use to meet the employment needs of Sheffield.

Size and Scale of Allocated Sites

3.26. Further to the type of sites, there are no allocated employment sites over 20ha in the Sheffield Publication Draft Plan. The NPPF¹⁴ states that industrial/logistic sites require “a variety of scales and in suitably accessible locations”. However, there is little variety in the size of the allocated sites in Sheffield with all sites under 20ha. What’s more is that the three allocated employment sites in Sheffield over 10ha (NES01, ES01, ES06) all have full matters planning applications granted on the sites and are therefore regarded as committed development and should not be classed as new employment allocations. In particular, ES06 and NES01 have large amounts of the site already constructed, with other elements of the site under construction. It is expected that by the time the Local Plan is adopted, scheduled for December 2024, the majority of these sites would have been developed. Therefore, the Local Plan provides no provision for employment sites over 20 ha, and those allocated sites over 10ha should already be regarded as committed development; thus there are no strategic allocations for employment sites in Sheffield.

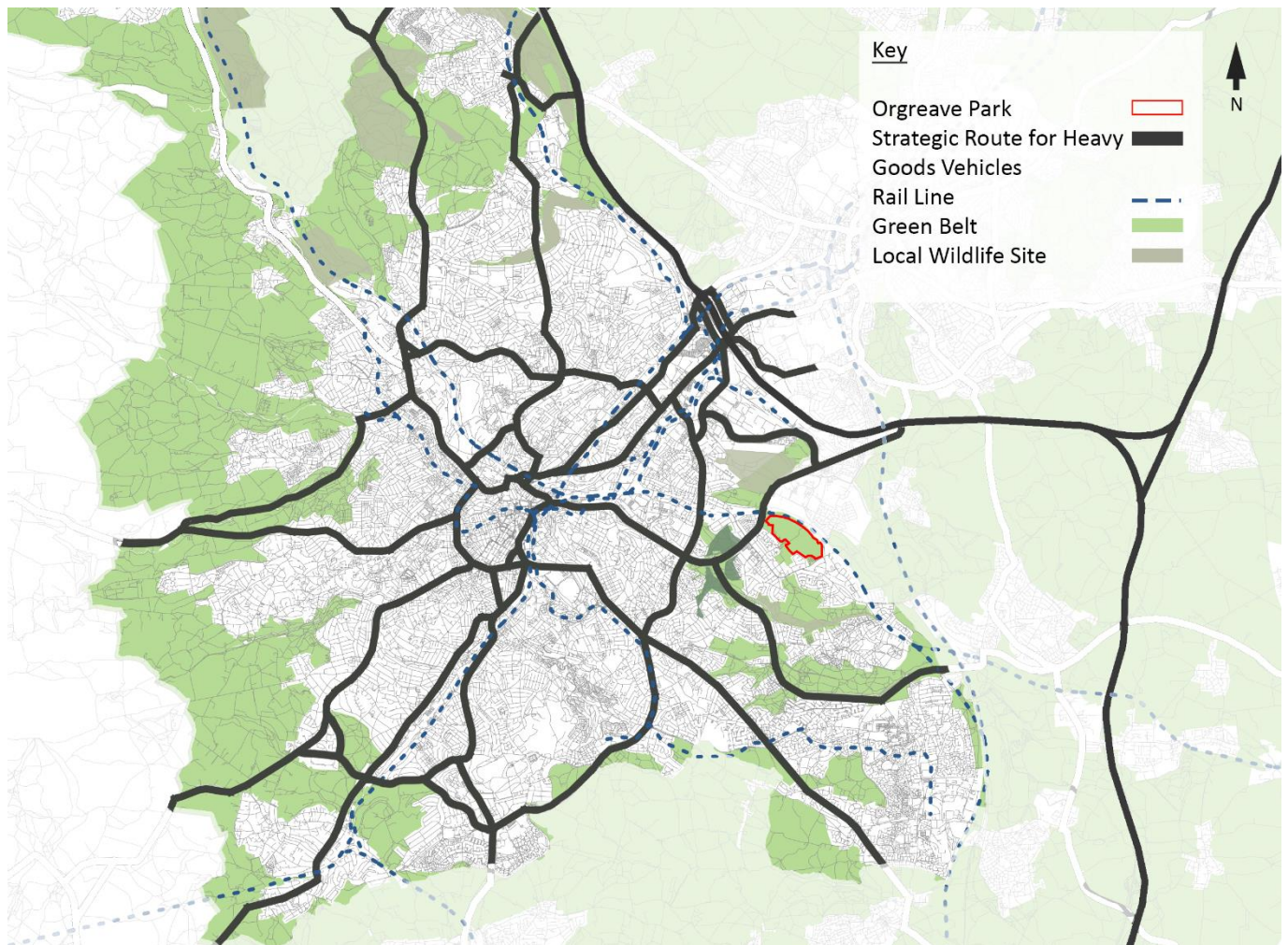
¹⁴ National Planning Policy Framework, Paragraph 83

- 3.27. As a result, the allocated sites in Sheffield are too small to provide the '*significant amounts of land*' required for size of sites in the PPG¹⁵ to accommodate for strategic facilities that serve national and/or regional markets. Consequently, the scale of the sites will effect on the type of industrial development in Sheffield by limiting opportunities for strategic facilities. This will inevitably restrict supply for potential businesses and thus restrict economic growth. This is contrary to guidance set out Chapter 6 of the NPPF¹⁶ which requires Local Plan to identify: strategic sites; a variety in scale of sites; and, for clusters of various types of industry.
- 3.28. Of particular importance, the Sheffield Logistics Study identifies there is a need for a site with a gross size over 50ha, with a good connection to the strategic highway network, and accessible to labour via sustainable transport¹⁷. Orgreave Park meets all of these requirements and is the only site within the main urban area which could deliver such a site, shown in Map 3.1 below.
- 3.29. Strategic sites are unlikely to come forward without Local Plan allocation due to the risk and complexity of such sites. Thus, within the parameters of the Plan there is little opportunity to meet the proven demand for strategic sites and will therefore restrict the opportunity to attract larger scale facilities/employers.

¹⁵ Planning Practice Guidance, Housing and Economic Needs Assessment, paragraph 31

¹⁶ National Planning Policy Framework, Paragraphs 81-83

¹⁷ Sheffield Logistics Study (2022), Icen Projects, Paragraph 7.10



Map 3.1 – Context of Orgreave Park (red line) within the context of Sheffield and the Strategic Road Network and Rail Lines.

Recommendation 4: Allocate strategically sized site(s) in Sheffield to meet the market demand for industrial land.

Broad Locations for Growth

- 3.30. In regards to Broad Locations for Growth, Savills supports the re-use of employment land for housing where the employment uses are no longer viable. The market for employment sites has seen a continual shift to larger, modern units well connected to major road infrastructure. Many units throughout Sheffield will therefore become surplus to requirement.
- 3.31. However, Savills questions why the proposed loss of employment land through the Broad Locations for Growth has not been factored into the employment land requirements. When calculating future needs it is important to consider the loss of employment land on top of the need to calculate the final requirement. This would follow the same methodology as the Standard Method for calculating a housing requirement.

Conclusion

- 3.32. The thrust of these representations is to promote economic growth in Sheffield. To achieve this economic growth, more employment land needs to be allocated and it needs to include larger strategic sites if it is to attract businesses operating in the regional/national markets. In particular, demand for industrial and logistic land has increased exponentially since the Covid pandemic and the Draft Sheffield Plan does not accommodate these changes.
- 3.33. Several recommendations are suggested to ensure Policy SP1 is found sound under Examination. Most pertinent is that Sheffield is constrained in the amount of non-Green Belt land available for both employment and housing purposes. To meet the objectively assessed need some Green Belt release is required.

Policy EC1: Development in the Advanced Manufacturing Innovation District – objection

- 3.34. We strongly support Sheffield's vision for Advanced Manufacturing and Innovative industries to deliver transformational economic development. The AMID has been a major factor in the regeneration of Sheffield and offers a unique opportunity moving forward to deliver a European leading hub for advanced manufacturing, advanced health and creative industries.
- 3.35. As part of realising this vision, we are promoting Orgreave Park to be included within the AMID. As Map 3.2 below shows, Orgreave Park provides a natural extension to the AMID, extending through the Waverley AMP to reach The University of Sheffield Innovation District and Sheffield Business Park.
- 3.36. As the Employment Land Review 2021 states, there were two requests for Advanced Manufacturing and one for Aero Tech which could not be fulfilled in the five months from February – July 2021¹⁸. Moreover the employment land supply position in Sheffield is just 0.8 years of industrial supply against the annual average take up¹⁹. As such, there is a clear identified need for additional well located employment land of an appropriate scale for advanced manufacturing. Without such land being released could lead to limiting the economic growth in Sheffield due to the lack of available land supply.

¹⁸ Employment Land Review Update for Sheffield (September 2021), Table 5.6

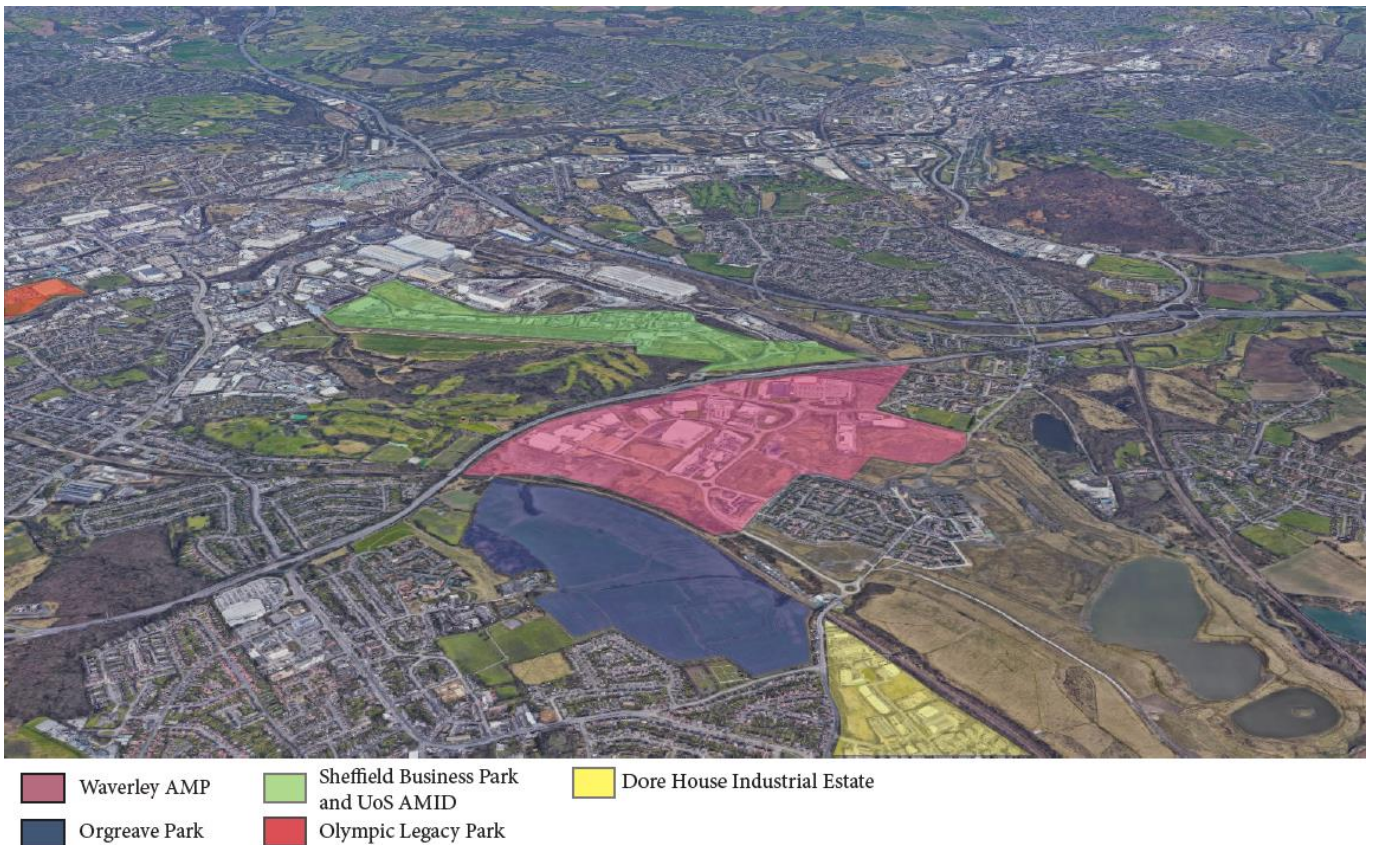
¹⁹ Employment Land Review Update for Sheffield (September 2021), Table 5.5

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- 3.37. The Sheffield Logistics Study supports these findings stating that the significant aspirations for advanced manufacturing will reduce supply for non-large logistics units in Sheffield due to the competition between sites. This would cause a shortfall of logistic supply in Sheffield without the allocation of more employment land²⁰.
- 3.38. The Savills 'Industrial Investment Strategy' (**Appendix C**) demonstrates that the lack of available high quality land for manufacturing, science and technology, and logistics will reduce the employment growth of Sheffield in the long-term. It also outlines the opportunity from the location of Sheffield, and the existing strength of the aforementioned sectors which could support strong economic growth in these sectors which Sheffield has traditionally been strong in. However, the land constraints around Sheffield is the biggest restriction in realising this economic potential. As such, Orgreave Park can provide sustainable development in a prime location to support economic growth in the advanced manufacturing and innovative sectors.



Map 3.2 – Google Maps showing the Location of Orgreave Park in the context of the AMID

²⁰ Sheffield Logistics Study (2022), Icen Projects, Paragraph 6.3

Orgreave Park, Handsworth, Sheffield

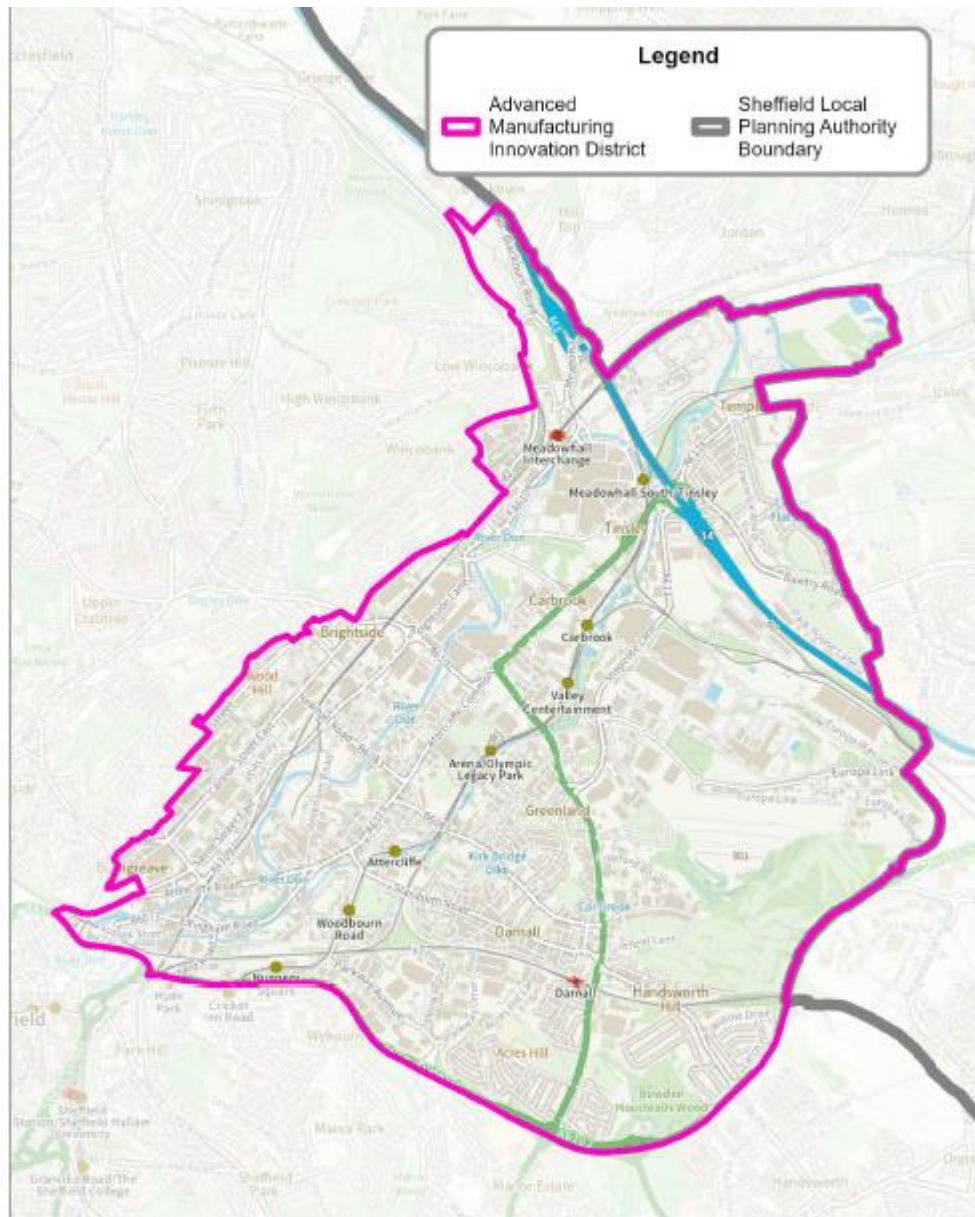
Representations to Sheffield City Council Publication (Reg 19) Draft Consultation



- 3.39. In support of this policy, Savills' make a suggestion to the area the policy applies to ensure it fully achieves its aims and objectives, as well as being found sound under Examination.
- 3.40. The current proposed AMID (shown on map 3.3 below) covers a very broad area for which includes residential districts and Meadowhall shopping centre in the northern part of the district. It is considered that these areas offer little in the way of supporting the aims and objectives of the AMID and thus should be removed.
- 3.41. Instead, the AMID should be focused on land which can specifically deliver advanced manufacturing without compromising land for other uses. As such, it is proposed the AMID extends to include Orgreave Park which currently adjoins the AMID on its north and western side. Through this inclusion, it would provide a positive policy context for Orgreave Park to deliver advanced manufacturing.

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Map 3.3 – The AMID as per Policy EC1

Recommendation 5: Include Orgreave Park in the Advanced Manufacturing and Innovation District.

Policy SP2: Spatial Strategy - objection

- 3.42. The approach towards distributing future growth detailed within SP2 is largely based on the development of previously developed land within existing urban areas. The Policy identifies nine sub-areas for Sheffield of which the Orgreave Park is located within 'Southeast Sheffield'. Savills supports the localised approach to the spatial strategy; comments relating to South-East Sheffield are discussed later in the report.
- 3.43. However, it is important to note that Orgreave Park lies on the north-western boundary of Southeast Sheffield and geographically relates as much with Waverley (Rotherham Borough) and Darnall as it does with the rest of Southeast Sheffield. In particular, due to Orgreave Park's access to the M1, there is a large amount of industrial developments with 2km of the site, including the adjacent Dore House Industrial estate and Waverley Advanced Manufacturing Park. As such, when considering Orgreave Park, it is important to contextualise the Site within the wider employment areas of Sheffield, Rotherham as well as Southeast Sheffield.

Policy SA5: Southeast Sheffield - objection

- 3.44. Policy SA5 sets out the spatial strategy for Southeast Sheffield, where the Site is located in the far north of the area, bordering Rotherham Borough Council and East Sheffield area. The policy sets out a target to deliver 1,640 homes and 22.6 hectares of employment land, as well as support for existing employment land and sustainable transport improvements. We set out our representations regarding each element in turn.

Employment Land

- 3.45. We have concerns regarding the amount of employment land proposed to be delivered through new allocations in Southeast Sheffield.
- 3.46. Southeast Sheffield benefits from its eastern location in Sheffield to offer fast access onto the M1, making it a prime location for employment development. As such, Southeast Sheffield has a number of business/industrial parks. However, none of these industrial parks have been developed in the last 15 years and as such are outdated in terms of the size and quality of units available.
- 3.47. Allocation SES03 is the only proposed new employment site in Southeast Sheffield. The other allocated sites are an intensification of existing employment land, which would be expected to be delivered whether a new local plan was delivered or not.
- 3.48. For instance, strategic employment allocation SES01 is part of the Dore House Industrial Estate and benefits from existing outline permission and designation as a 'General Industry Area' in the adopted development framework. By including an undeveloped part of the site as an allocation, it does not provide any new employment land and should instead be considered as an existing employment area. By re-allocating existing employment land as new allocations, it constitutes 'double counting'.

- 3.49. Therefore, allocations such as SES01, as well as SES02, SES04, SES05, and SES07 which are expected to provide 15.75 ha of the 23.51 ha of the employment land in Southeast Sheffield, do not constitute sustainable new employment allocations in line with the Planning Practice Guidance²¹ (PPG) and advice given by Planning Inspectors in recent examinations such as Calderdale. Thus, the 6.85ha of new employment land provided by SES03 is not sufficient to meet either the amount or the variety of employment land required for Southeast Sheffield to meet its identified employment needs.
- 3.50. Furthermore, the existing industrial estates in Southeast Sheffield were all in existence before the UDP (1998) and therefore are considered to contain largely outdated stock, not capable of attracting advanced manufacturing and other high quality employers. In particular, the units of the existing stock, as well as the allocations, are largely small and medium sized units which would not be capable of supporting large swathes of businesses. Demand for larger, high-specification units is only increasing yet the employment land in Southeast Sheffield does not accommodate these needs. As per the PPG²² *“When assessing what land and policy support may be needed for different employment uses, it will be important to understand whether there are specific requirements in the local market which affect the types of land or premises needed”*; the current allocations in Southeast Sheffield do not meet this requirement.

Recommendation 6: Allocate more employment land in Southeast Sheffield to take advantage of its sustainable location.

Sustainable Transport Improvements – Barrow Hill Line

- 3.51. Savills support in principle the proposed re-opening of the Barrow Hill line including the station at Waverley. Norfolk Estates supports this redevelopment and wishes to work with SCC and the relevant stakeholders and bodies, including national government to support this reopening. Land at Orgreave Park could be made available to facilitate the new station along with an appropriate financial contribution depending on the scale and type of development which is achievable.
- 3.52. It is considered the Barrow Hill line would help support employment development for Sheffield, particularly the AMID, through offering a larger pool of workers to access the employment opportunities it would offer. Therefore the Barrow Hill Line would help Sheffield meet its Local Plan objectives.
- 3.53. However, Savills understands this line is dependent on funding, including grant funding from national government. To help support the delivery of this significant sustainable transport infrastructure, further sites for housing and employment should be allocated to help bring in funding through the Community Infrastructure Levy. This could include Orgreave Park whereby delivery of employment uses on the site would help strengthen the case for grant funding for the Barrow Hill line.

²¹ Planning Practice Guidance, Plan Making

²² Planning Practice Guidance, Housing and Economic Needs, Paragraph 32

Policy H1: Scale and Supply of New Housing - objection

3.54. Policy H1 sets out the parameters of which SCC intend to deliver the proposed housing growth sets out in Strategic Policies SP1 and SP2. Of the 35,700 dwellings to be delivered in the plan period, it is proposed 85% will be from previously developed land. The method of delivering dwellings is set out in the Table 1 of the emerging Plan which supports Policy H1 is shown below.

Table 1: Housing Land Supply 2022-2039

Source of Supply	Total Supply (2022-2039)
Remaining capacity on large sites with planning permission not proposed as allocations (as at 1st April 2022)	630
Proposed allocated sites	26,995
Allowance for small sites with planning permission and windfall sites	3,400
Estimated supply from developable sites in 'Broad Locations for Growth' and in other areas (mainly years 6-15)	4,675
TOTAL	35,700

Table 2.1 – Policy H1 sources of housing land supply

- 3.55. Savills' has concerns linked to the reliance of housing numbers coming from previously developed land, particularly where this would see the redevelopment of employment land. From a review of housing allocations, a substantial amount of allocations on former industrial land, in addition to the broad locations of growth also being reliant on employment land being converted to residential. Despite these expected losses SCC have not accounted for these substantial losses in employment land into their future employment calculations, contrary to national guidance²³.
- 3.56. Of the 26,995 dwellings expected to come from allocations, over two thirds (18,185 dwellings) are expected to be built within the Central Area of Sheffield. These are predominately from land previously in employment uses, as shown on the UDP Central Policies Map. For instance, allocation SU03 was granted full planning permission (19/00483/FUL) in February 2020 on land formerly in 'Business Area' and the land has since been cleared for development. There are a several other sites within the wider Netherthorpe Area of Sheffield which were formerly in business or industrial use which are now either housing or are allocated for residential development.
- 3.57. Moreover, a further 11.3% of the dwellings are expected to be delivered through Broad Locations of Growth. To deliver 4,675 dwellings on predominately employment land, would see a significant loss of employment land supply.
- 3.58. This loss in of employment land through allocating employment land for housing, and through Broad Locations for Growth, has not been considered within the Publication Draft Plan when considering the employment needs of the Sheffield. When objectively assessing the employment needs of an area, the total requirement also needs to consider the amount of employment land which is expected to be lost. Sheffield has not assessed this, nor allocated adequate amounts of employment land to account for the loss of employment land. This highlights the effects that the shortage of land creates between employment and housing.
- 3.59. In addition, the 2,100 dwellings per annum is considerably below the Standard Methodology figure of 2,973 dpa. This causes a conflict whereby the need to allocate more land for housing would reduce the land used for employment due to the land constraints in Sheffield. As such, the only way to provide additional growth is to allocate undeveloped land for development. If land was allocated at Orgreave Park for employment uses, it would allow further employment land to be developed for residential, helping Sheffield meet its housing needs as well as its employment needs.

Recommendation 7: Add the expected losses of employment land onto the employment land requirement to ensure the requirement is robustly calculated.

²³ Planning Practice Guidance, Housing and Economic Needs

Policy T1: Enabling Sustainable Transport

- 3.60. Savills strongly supports the proactive approach Policy T1 as it delivers a strong framework to improving transport links both within the city-region level, and on a national and regional level. Transport infrastructure plays an important role in the connectivity for residents, workers and businesses which helps improve the productivity of Sheffield. It also will help tackle the climate emergency by reducing the reliance on private vehicles.
- 3.61. Savills supports the initiatives proposed on a national level which support improvements to road and rail infrastructure. In particular, concentrating road-based freight onto the Strategic Heavy Goods Vehicle Route Network (SHGVRN) is essential to ensure the quick transfer of goods to their destination. Orgreave Park lies adjacent to the SHGVRN and can offer fast access onto the network, with minimal use of tertiary roads. Thus, Policy T1 supports the allocation of Orgreave Park for employment uses.
- 3.62. In terms of sustainable transport of a city-region Savills supports the commitment to the Supertram network and improving rail connections within the combined authority area. As aforementioned, Orgreave Park lies along the Barrow Hill Line and offers the opportunity to develop a station at Waverley as well as providing CIL funding via development to support the line.
- 3.63. In addition, Savills supports the seven identified Mass Transit Corridors and the development of bus priority schemes. To support these important improvements it is important to release sufficient land to help secure infrastructure payments from developments as well as support job creation in sustainable areas which are well served by public transport.
- 3.64. Overall, Policy T1 is positively prepared and offers the opportunity to improve transport connectivity in Sheffield. To help support the aims and objectives within the policy, the release of sustainably located land, in locations supported by Policy T1, would provide infrastructure funding to support the delivery of such infrastructure. Therefore synergy is needed throughout the Plan to ensure the delivery of the objectives of Policy T1.

Recommendation 8: Support development of land which is sustainably located within the parameters set out in Policy T1.

Policy IN1: Infrastructure Provision

- 3.65. Savills support Policy IN1 to provide new infrastructure to enable and support growth. However, Savills have concerns over the deliverability of the policy due to the restrictive nature of developments, their viability and thus the funds raised by CIL. Savills note the majority of proposed development is on brownfield land in the central areas of which there are known viability issues.
- 3.66. As such, it is important not to rely solely on developments which may require infrastructure developments to deliver the scheme but instead sites which are already in accessible locations with capacity on the road network. Work conducted by Pell Frischmann demonstrates that development at Orgreave Park could be accommodated into the strategic road network without the need for improvements via public money.

4. Summary and Conclusions

- 4.1. These representations have been prepared by Savills (UK) Ltd on behalf of Norfolk Estates, in response to the Sheffield Emerging Local Plan - Publication Draft (Reg 19) consultation. The representations seek to ensure the emerging Sheffield Local Plan is positively prepared, justified, effective, and consistent with national policy.
- 4.2. The representations seek to highlighted the changing approach in the promotion of the Land at Orgreave Park, Handsworth, Sheffield for employment development. The Site in close proximity to the Advanced Manufacturing Park and Advanced Manufacturing Innovation District. It is sustainably located within the urban area of Sheffield, surrounding by built development on all sides, and with potential fast access to the M1 via Sheffield Parkway.
- 4.3. We support many objectives and policies in the Reg19 Plan. However, the thrust of these representations is to provide detailed comments on the growth options and employment land type and quantity to ensure that the Local Plan provides for sufficient amounts of employment land in the most suitable and sustainable location to ensure Sheffield delivers its economic growth objectives.
- 4.4. It is clear from the review provided in this representation, that there is a shortage of new land for employment and the over-reliance on existing employment land. The strategy risks therefore not attracting the new national employers which will stifle economic growth. We therefore make the following recommendations in the interests of effective, justified, consistent and positive plan making: -

Recommendation 1: Reassess the employment land need to include suppressed demand factors and future trend analysis.

Recommendation 2: Remove committed developments and sites that are already employment land from new allocations.

Recommendation 3: Allocate more land for industrial use to meet the employment needs of Sheffield.

Recommendation 4: Allocate strategically sized site(s) in Sheffield to meet the market demand for industrial land.

Recommendation 5: Include Orgreave Park in the Advanced Manufacturing and Innovation District.

Recommendation 6: Allocate more employment land in Southeast Sheffield to take advantage of its sustainable location.

Recommendation 7: Add the expected losses of employment land onto the employment land requirement to ensure the requirement is robustly calculated.

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Recommendation 8: Support development of land which is sustainably located within the parameters set out in Policy T1.

- 4.5. We welcome the opportunity to maintain engagement in the preparation of the new Local Plan and would be happy to discuss any of the points raised within these representations.



Appendices

Appendix 1 Location Plan – Land within the Management of Norfolk Estates



Red Line showing the submitted site within the representation. Blue line shows additional land under the client's ownership

[REDACTED]

From: [REDACTED]
Sent: 16 June 2022 15:56
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Industrial & Logistics

FYI below - the Future of Freight Plan has been released. Good to see our Logic of Logistics Report has been referenced.

A couple of clients have been in touch about responding to the Autumn consultation. I will coordinate with the group once further details emerge.

From: [REDACTED]
Sent: 15 June 2022 15:57
To: [REDACTED]
Subject: Future of Freight Plan published

[EXTERNAL EMAIL]

Dear Industrial Committee, Industrial Associates and BPF Supply Chain Board,

For your information, the government have today released their long-awaited Future of Freight Plan. The plan sets out a strategy for how government and industry can work more closely together 'to deliver a world-class, seamless flow of freight across the UK's roads, railways, seas, skies and canals'.

<https://www.gov.uk/government/news/boost-for-freight-as-government-unveils-major-new-plan-to-bolster-supply-chain>

<https://www.gov.uk/government/publications/future-of-freight-plan>

I am still working my way through the document however members (in particular those who sit on industrial committee) will be interested in chapter 5 on planning reform. There is a commitment in there to a call for evidence on planning more effectively for logistics this Autumn which will feed into the government's wider review of planning reform and guidance associated with the Levelling Up and Regeneration Bill.

Government have also launched a major campaign today to recruit and retain a skilled workforce in the logistics sector titled 'Generation Logistics'

Our research report – [Levelling Up: The Logic of Logistics](#) – is also listed three times in the footnotes section of the Future of Freight Plan.

Kind regards

[REDACTED]
Head of Planning and Development
[REDACTED]

British Property Federation, St Albans House, 57-59 Haymarket, London, SW1Y 4QX
www.bpf.org.uk

From: [REDACTED]

Sent: 12 May 2022 17:21

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Industrial & Logistics

All,

Many thanks to those who were able to attend the discussion this afternoon, which was very useful. We are clearly very active for a wide number of clients and there seems to be the potential to work together effectively in a number of areas to coordinate activities and to develop our I&L business across the regions.

I promised to send a short note to summarise the actions. This was a kick off meeting so I imagine ideas will develop as we go forward:

- I will try to make a first stab at putting together a client list with some geography attached to it. Everyone agreed to send a list back and I will put it together into a comprehensive document that we can look at next time. I have suggested a format in the attached document – please complete and return as appropriate. Hopefully this might help to identify areas where we can target existing client relationships on wider geographical basis where there are ‘gaps’.
- We will arrange a monthly recurring meeting – I will send an invite shortly.
- [REDACTED] to do 20 min presentation at next meeting to summarise the recent BPF work on Suppressed Demand plus and other useful work that can be promoted to clients.

- We will arrange a series of targeted client dinners over the course of the year (say 10-15 people each time total), and perhaps we can agree a target list at the next meeting. [REDACTED] and [REDACTED] are happy to attend and present at these, in addition to the right people from planning depending on the client. I happy to take a lead arranging these on behalf of the group subject to identifying suitable admin resources to help out etc.
- Potential to organise or take part in a larger client event in the future – this needs further thought so is something to discuss again next time.
- Something else for future discussion will be potential marketing activity and assistance, website/linkedin profile etc

I hope that captures most things but please let me know if I've missed anything.

[REDACTED]

From: [REDACTED]

Sent: 12 May 2022 13:40

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Industrial & Logistics

[REDACTED] et al

I am looping [REDACTED]s in the Birmingham Development team into this conversation / group. [REDACTED] undertakes a lot of market based need assessment work in support of I&L proposals on a national basis and is probably unique within Savills in that regard. [REDACTED] interfaces a lot with [REDACTED], and with [REDACTED] and the agency teams. [REDACTED] will not join the call today as she is reluctant to crash a planning party, but could we please keep her copied to outputs. Matters of best practice for need assessment work, the interrelationship between models and market evidence, fees for undertaking such work, marketing and common awareness of instructions for conflict and synergy reasons are all areas of interest for [REDACTED]

Look forward to discussing shortly.

Thanks

[REDACTED]

From: [REDACTED] >

Sent: 29 April 2022 15:43

To: [REDACTED]

Cc: [REDACTED]

Subject: Industrial & Logistics

All,

As many of you know we have been intending to draw together the various client activity in the increasingly busy I&L sector to share information and to become more effective from a business development point of view. As a planning team we are market leaders in this sector and I think we are probably the only team in the country which has the ability to work closely with all three industry-leading economics, research and industrial agency teams. [REDACTED] has asked me to activate a planning working group to act as a forum to help coordinate this and I am sending this email to who I think are the most appropriate individuals to get the ball rolling. Some of you I have spoken to and others not, so please let me know if there is anyone else who should be included or indeed if you don't need to be involved.

I suggest that we arrange a short initial discussion in the next couple of weeks to agree the best way forward in terms of what we might want to achieve, and to discuss any ideas. Initial thoughts include:

- Format – monthly meetings?
- Marketing collateral
- Thought leadership ([REDACTED]), cross sector working
- Client targets and BD ideas, potentially alongside agency, economics or research ([REDACTED] cc'd)
- Project/client lists, fee income monitoring
- Industry events and conferences
- Admin support

I will send a Teams invitation initially for the week beginning 9 May which hopefully will be convenient for most people. Please let me have any thoughts - or good ideas - in the meantime.

[REDACTED]

[REDACTED] (Hons) MRTPI
Director
Planning

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