

Greater Norwich Local Plan Team

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Dear Sir or Madam,

Greater Norwich Local Plan Site Proposals Addendum (New, Revised & Small Sites) Consultation: Comment in Relation to Site Reference GNLPSL0466 – Land East of the A140 and North of Norwich International Airport, Horsham St Faith.

1.0 Introduction

- 1.1 On behalf of our client, Horsham Properties Ltd, we write in respect to the Greater Norwich Local Plan, Regulation 18 (b), New, Revised & Small Sites Consultation, published October 2018.
- 1.2 This letter comprises our representation regarding Site Reference GNLPSL0466 – Land East of the A140 and North of Norwich International Airport, Horsham St Faith, allocated under adopted policy HNF2 for airport related employment uses within the Broadland District Council Site Allocations Development Plan Document (Broadland Site Allocations DPD, 2016).
- 1.3 In summary, Horsham Properties Ltd supports the incorporation of this employment allocation (site reference GNLPSL0466) within the Greater Norwich Local Plan (GNLP), but requests that any future accompanying policy wording is not unduly restrictive in order to promote the delivery of this allocation. With this in mind, it is requested that the current policy wording, which confines uses to those associated with the airport, is unwarranted and requires revision to allow for a more flexible approach.

2.0 Background

- 2.1 Abbey Farm Commercial Park comprises a number of thriving industrial (B1, B2 & B8) units located immediately to the west of Horsham St Faith. Horsham Properties Ltd, who own and operate the Commercial Park, have experienced increased interest in the provision of industrial accommodation as a result of the growth in the City of Norwich and the provision of the Norwich Northern Distributor Road (NNDR).

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2.2 In order to address this demand, Horsham Properties Ltd are in the process of preparing a planning application for development which would extend the business park to the west into the allocated employment area (also identified as site reference GNLPSL2007 on the Greater Norwich Local Plan Regulation 18 Consultation Site Proposals maps for Horsham & Newton St Faith).

2.3 Levels of demand for industrial units in the surrounding area is likely to increase as a result of airport expansion and proximity to the NNDR. The site owners therefore see opportunities for further investment in the area identified as site GNLPSL0446, south-west of Horsham St Faith.

3.0 Greater Norwich Local Plan 'New, Revised & Small Sites' Consultation

3.1 Site GNLPSL0466R is identified on the revised Site Proposals maps for Horsham & Newton St Faith as 33ha area of land allocated for employment uses. The site boundary is similar to the existing allocation within the Broadland Site Allocations Development Plan Document (policy HNF2), but excludes an area of approximately 2ha located in the south-eastern corner.

3.2 The Joint Core Strategy (JCS) identified that this is a strategically important site which will play a role in contributing to growth in the Norwich Policy Area. Policy 9 of the JCS originally envisaged the site to be *"focused on uses benefitting from an airport location"*.

3.3 A tie between the site and Norwich Airport was further emphasised in the Broadland Site Allocations DPD under policy HNF2 (2016), which required that businesses *"demonstrate there will be a significant specific benefit from a use being located near the airport"*. This policy placed restrictions on the phasing of the development, controlling the mix of uses and requiring that extensive landscape buffers are provided to the north and eastern peripheries of the site.

3.4 Since 2016, the NNDR has been delivered, promoting the economic sustainability of this area. The NNDR will also ensure accessibility and connectivity to the major road network, which can only serve to alleviate any potential transport impacts associated with development of site GNLPSL0466. However, investment in this site has inevitably been delayed until the completion of the NNDR and the NNDR creates a different geographic relationship with the airport than historically policy envisaged.

3.5 The National Planning Policy Framework (NPPF, 2018) states that achieving sustainable development requires that the planning system builds a *"strong, responsive and competitive economy"* (paragraph 8). In order to deliver this, planning policies should *"help create the conditions in which business can invest, expand and adapt"* (paragraph 80).

3.6 Flexibility to respond to market demand is key to delivering an optimum range of uses and the quantum of jobs required to maximise sustainable economic growth, and is therefore central to achieving the over-arching objectives of the Greater Norwich Local Plan.

3.7 In line with the sentiment of national policy, whilst it is acknowledged sufficient provision must be ensured for businesses associated with the airport, it would not be appropriate to insist site

operators allow units to lie empty, preventing them from catering for local demand, or allow the viability of the business to suffer as a result of a necessity to save units for airport related uses.

- 3.8 Whilst local businesses and investors are confirming market demand for industrial units within this area, the historically rigid policy wording would not enable businesses to rapidly respond to economic circumstances (NPPF, paragraph 81) and this could risk them not remaining viable to provide capacity for the airport related uses at all.
- 3.9 The development at Imperial Park is an example of this, whereby a need for a pragmatic approach to the promotion of airport related uses has become evident. It is also noted that the Airport Masterplan does not identify additional land for airport related uses in excess of that provided to the south of the runway and at Imperial Park.
- 3.10 The Market Appraisal provided by Bidwells & Roche under the instruction of Norwich Airport, submitted to accompany the variation of condition application at Imperial Park (reference 20181762), also supports our view that demand is growing for unrestricted, industrial floorspace in this part of the Greater Norwich Local Plan area. The study also suggests that sites which can achieve direct access to the NNDR, such as site reference GNLPSL0446, will also be particularly attractive to the logistics and warehousing sectors.
- 3.11 In line with the points made by Brown & Co. in their representation to the GNLP Regulation 18 Site Proposals Consultation Document, regarding site reference GNLPSL4066, Horsham Properties Ltd also request that the policy mechanism for supporting airport related uses is reviewed in order that the allocation is permitted to deliver the maximum employment benefits to the local area.
- 3.12 The site owners in particular, support the removal of policy restrictions controlling the mix of industrial (B1, B2 & B8) uses given the flexible approach advocated in the NPPF. In the northern area of the site, we also feel that the provision of industrial uses is essential to ensure sufficient employment benefit, and associated levels of job creation, are delivered by the allocation as a whole. It is noted that without such a stipulation, the market might favour more lucrative development in non-industrial use classes throughout the site.
- 3.13 The legal requirements of the Community Infrastructure Levy Regulations 2010 are noted and the site owners request that during policy formulation, the necessity to restrict elements affecting the viability of the scheme, such as dictating phasing or the provision of landscaping, are reconsidered to ensure delivery of the allocation is not compromised without adequate justification.
- 3.14 It is also noted that 2ha in the south-eastern corner would be removed from the allocation and that an access is potentially required for a Park and Ride facility to the east. The delivery of employment uses in the northern area of the site will need to be reconciled with land levelling and infrastructure costs for the site as a whole, and areas of land sacrificed to provide landscape buffers. A coordinated approach to the delivery of this allocation is therefore essential to ensure the northern

portion of the site relates well to development in the south, and that the allocation remains deliverable in the main, not just in part.

4.0 Conclusion

- 4.1 In summary, Horsham Properties support the incorporation of the existing employment allocation (site reference GNLPSL0466) within the Greater Norwich Local Plan (GNLP) and note that sufficient planning harm does not arise to justify the current policy restrictions tying the site to airport related uses or controlling the mix of industrial use classes.
- 4.2 Any associated policy wording should also be reviewed to promote the comprehensive delivery of the allocation, taking account of the current geography, necessity to promote long term viability and flexibility of businesses, and the need to ensure the impacts of development are suitably mitigated.

We trust you find the above information to be helpful, please contact Kathryn Oelman on 01206 835150 if you require further clarification.

Yours faithfully,

Kathryn Oelman
Lawson Planning Partnership Ltd