

Date: 16th March 2020

Ref: 2052

Greater Norwich Local Plan
Sent via email to: GNLP@norfolk.gov.uk

Dear Sirs,

Re: Greater Norwich Local Plan, POLICY KES 2 (including GNL0497) Land west of Ipswich Road, Keswick (approx. 12 ha)

Allocation for employment uses

This submission is made in respect of Land West of Ipswich Road, East of B1113 (Ref: GNL0497) on behalf of Norwich Apex Limited.

Norwich Apex are the owners of Apex Business Park (formerly MAHB Capital). Norwich Apex secured planning permission for Apex Business Park in 2018 from South Norfolk Council (2017/2794) which includes KES2 and are currently assembling the required infrastructure for the site (including the access, link road and strategic landscaping).

We note the emerging policy in the draft GNL0497:

Existing allocation to be carried forward

POLICY KES 2 (including GNL0497) Land west of Ipswich Road, Keswick (approx. 12 ha) is allocated for employment uses.

The development will be expected to address the following specific matters:

- *Mixed use development within Use Classes B1, B2 and B8, the ratio of uses being subject to acceptable highways impacts;*
- *An access road across the site from B1113 to A140 at Tesco Harford, with roundabout access from the B1113 and revised traffic light junction on the A140, to be agreed with Highways Authority.*
- *Restriction of a right turn movements at the existing B1113/A140 junction.*
- *Off-site cycle and footway links connecting to Low Road, Keswick and the Yellow Pedalway on the A140.*
- *Appropriate layout, scale and landscaping to protect properties to the north and to reflect the setting of the site within the Southern Bypass Landscape Protection Zone and its location on a gateway into Norwich.*
- *Off-site strategic landscaping north-west of the B1113.*
- *Sustainable drainage, reflecting the implications of the river valley location.*
- *Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is underlain by safeguarded mineral resources.*

Norwich Apex fully support this proposed policy allocation. The land presents the opportunity to provide additional employment floorspace in a sustainable location and in a sustainable manner and contribute to the challenge of providing jobs growth in the Greater Norwich Area over the plan period.



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It is considered that the site, in combination with KES2, would have the capacity to deliver in the region of 30,000 sq. meters of employment floorspace across the 'B' uses and potentially other employment generating uses. A development of this nature could deliver circa 1000 new jobs.

We have included with this submission the 'GNLP Preferred Sites for Site Allocation – Owners Information and Confirmation of Viability and Expected Delivery' form. This sets out progress with the delivery of the site including:

- The site is currently being marketed. Norwich Apex have boards on site, a brochure and a website (<https://norwichapex.co.uk/>).
- Buildings are available to purchase or lease.
- Norwich Apex currently have 28 live enquiries from companies of all sizes, including local and international. The enquiries range from 3,000 sq ft to 150,000 sq ft.
- Norwich Apex have agreed the first two deals on the site. The first deal is the sale of a 15,000 sq ft B2 building which is for a new company to the area. It will manufacture and create 40 jobs once up to full capacity. These jobs will include research and design. The second deal is the lease of a 15,000 sq ft B8 unit.
- Most interest is from local companies looking to acquire a brand new building to expand their business. Feedback from potential occupiers is that this is an excellent location for their business due to the proximity to the A47 and A11. Most businesses we are talking with have staff located to the south or east of the city, therefore, creating far less traffic through the City Centre.

In addition, and for completeness, we include our previous representations submitted in respect of the site in 2018.

We submit that the land subject of this submission is suitable for inclusion in the local plan and we support the proposed policy.

Yours sincerely,

Ian Douglass
Head of Planning

cc. Craig Knights, Norwich Apex

Enc.



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Appendix 1. GNLP Preferred Sites for Site Allocation – Owners Information and Confirmation of Viability and Expected Delivery form.



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Appendix 2. Previous representations in respect of GNLP0497 submitted 2018.



**GNLP Regulation 18 Consultation Response
March 2018**

**Land West of Ipswich Road, East of B1113
GNLP0497**

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1. Executive Summary

This submission is made in respect of Land West of Ipswich Road, East of B1113 (Ref: GNLP0497) on behalf of MAHB Capital the promoters of the site. The submission is made by Ian Douglass, Head of Planning, Lanpro Services, Brettingham House, 98 Pottergate, Norwich, NR2 1EQ

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In order to make our submission representation we have set out our response on this proforma. We have extracted the questions from the consultation document that are relevant to our site and the case for its allocation, and provided written answers supported by plans and other material contained in the Appendices where necessary.

The site presents the opportunity, in combination with an existing allocation (KES2), to provide land for additional employment floorspace in a sustainable location and contribute to the challenge of providing 45,000 jobs in the Greater Norwich Area over the plan period. It is considered that the site, in combination with KES2, would have the capacity to deliver in the region of 30,000 sq. meters of employment floorspace. A development of this nature could deliver circa 1000 new jobs.

KES2 requires the delivery of a link road between the A140 and the B1113. An expanded KES2 allocation as envisaged by this submission, would facilitate the delivery of this link road (whereas in isolation, KES2 cannot deliver the link road). This has been established through a Viability Assessment (VA).

We note that the evidence base (Employment Land Review) supporting the Reg 18 consultation acknowledges that whilst on paper, there may be a large quantity of potential employment land for development, the quality of this supply is untested. We submit that, going forward, it should be recognised that there are weaknesses within the identified employment land supply pipeline across the Greater Norwich Area and as set out within the GNLP Reg 18 document, and the opportunity to capitalise on sustainably located and deliverable employment land, that can be made available to the market promptly (such as the site subject of this submission), should not be lost.

An expanded KES2 allocation has been tested and would be viable and deliverable both in respect of delivering a link road between the A140 and the B1113 (providing wider public benefit); and the infrastructure necessary to provide servicing to the site. This means an expanded KES2 allocation could be made available to the market quickly and would not be fettered by infrastructure burdens (as other allocations experience).

In respect of demand, the promoter of the site has had substantial interest in it from operators from within the B1, B2 and B8 use classes since 2014. The land is available for development and as such, we submit that the site should be included in the emerging local plan.

2. Site Introduction and Description

The site represents an opportunity to build on an existing employment allocation at Harford / Keswick (KES2) (see proposal plan submitted with this representation at **Appendix 1**). The site has the potential to accommodate a range of employment generating uses and particularly B1, B2 and B8.

KES2 is allocated for B1 use in the adopted SNC Local Plan (October 2015), which requires any development of it to provide the following infrastructure:

- An access road across the site from B1113 to A140 at Tesco Harford, to be agreed with Highways Authority.
- Right turn junction into site from B1113
- Landscaping/bunding to protect properties to the north.

The site boundary plan at **Appendix 1**, shows the extent of the site subject of this representation, amounting to 8.13 hectares, adjoining the boundary and to the south of KES2.

The site is on the urban fringe and to the south of Norwich within South Norfolk District (Grid Reference TG 21745 04553) and currently consists of Arable fields. It is bounded by the B1113 to the west and the A140 to the east and situated close to the A140/A47 to the south. An arable field and another road lie immediately to the south of the site along with the Harford Park and Ride development.

The wider landscape is occupied by arable fields; small parcels of woodland and scrub; trunk road / highway infrastructure including the A47 and A140; overhead power / transmission lines and pylons (including those that run across the northern boundary of the site); and substantial urbanising development namely the Tesco supermarket and the Park and Ride.

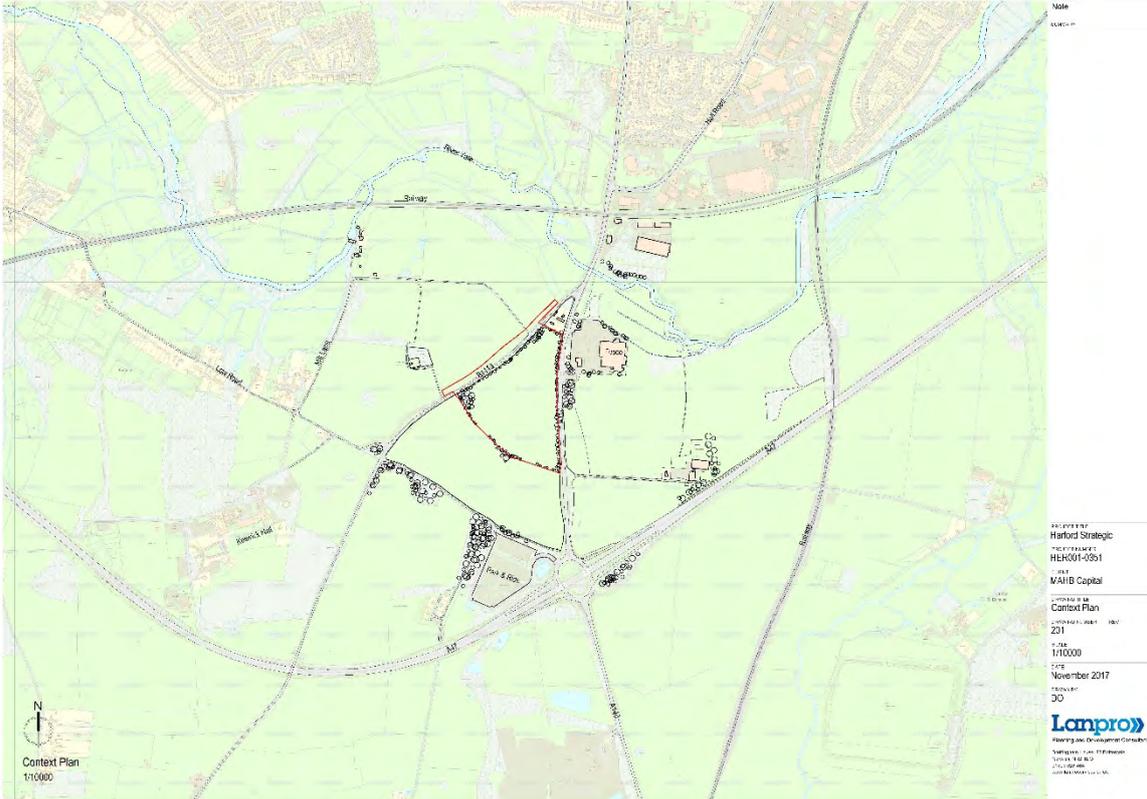
The village of Keswick is located approximately 550m west of the site. There are residential properties located immediately to the north of the site. These properties are separated from the site by a tree belt.

The site gently rises to the south forming a plateau area along its southern boundary, with the Park and Ride development sitting further to the south. Hedgerows are present along the field boundaries and two small wooded areas are located in the south of the site. The site does not have any Public Rights of Way (PROW) or bridleways crossing it. There is a PROW (Keswick BR7) from the B1113 to Keswick Mill.

The site is not within a designated site / area in regard to landscape or nature conservation and does not accommodate any Scheduled Monuments or Listed Buildings.

3. Site Location

The site location is shown on the context plan below.



4. Site Opportunities

The site presents the opportunity, in combination with KES2, to provide land for additional employment floorspace in a sustainable location and in a sustainable manner and contribute to the challenge of providing 45,000 jobs in the Greater Norwich Area over the plan period.

It is considered that the site, in combination with KES2, would have the capacity to deliver in the region of 30, 000 sq. meters of employment floorspace across the 'B' uses. A development of this nature could deliver circa 1000 new jobs.

KES2 requires the delivery of a link road between the A140 and the B1113. An expanded KES2 allocation as envisaged by this submission would facilitate the delivery of this link road whereas in isolation, KES2 cannot deliver the link road. This has been established through a Viability Assessment (VA). The VA has informed the amount of land-take that is proposed in this submission and which is only that amount needed to accommodate a commercial development of circa 30, 000 sq. m that will fund the highway infrastructure and deliver the public benefit.

The new link road would greatly improve the general traffic flow in the area and remove the regular congestion experienced by drivers.

Broadly, the allocation of the site would bring about the following benefits:

- A high quality commercial development in an appropriate landscape setting.
- Circa 30, 000 sq. m of employment floorspace (likely B1, B2 and B8).
- A substantial tree and landscaping belt along the north-western side of the B1113.
- Development could be sited / set in to the ground to minimise the impact on the landscape (See attached LVIA at **Appendix 2**).
- Delivery of the link road.
- From a commercial perspective, the site sits in a sustainable location on the southern side of Norwich in close proximity to the City and to the A47 junction to the south. The owners have received substantial inquiries from prospective occupiers of the site.
- The site could deliver circa 1000 new jobs.

A planning application for the proposals described above has previously been supported by Planning Officers at South Norfolk Council. The current planning application for the proposals, and supporting documents can be found at:

<https://info.south-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=P0LJ5LOQI4500>

5. Response to relevant consultation questions

Section 3 – The Vision and Objectives for Greater Norwich

1. Do you agree with the draft vision and objectives for the plan below?

We broadly agree with the overarching vision and objectives for Greater Norwich to 2036 as set out at Figure 1. Notwithstanding, we provide more specific comments / submissions below in respect of the need for the necessary and appropriate location, choice and availability of employment land within the GNLP area in order to achieve this vision.

Section 4 – The Strategy

Delivering jobs, homes and infrastructure

2. Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1-4.7?

The Greater Norwich Local Plan is an opportunity to make the wider Norwich area a hub for investment, commercial activity and high- quality place making, which will be of benefit to all who live and work there, building on the significant existing attributes.

We welcome the joint working of the different authorities, who will lead the planning process for this Plan, in our view to take the required strategic view essential to the future prosperity of the Greater Norwich area.

We are presently at a unique position, where there is a recognition that growth is needed, there is a need for investment particularly on key infrastructure, clear opportunity areas (particularly around the A11 corridor) and a recognition that new settlements may form a key role in ensuring delivery.

There is a need for the Greater Norwich area to benefit from the economic growth at Cambridge to the south (as well as ensuring it captures any opportunities looking to Great Yarmouth to the east) and not be left behind by accelerated investment at those locations.

It is our view that there are a series of opportunities that recognise the existing attributes within the area, but which can also secure the levels of economic growth which will be of benefit to those who live and work here. Alongside the City Deal initiative, it is noted that a target of 45,000 new jobs is sought over the plan period. Whilst there is recognition in the Regulation 18 consultation of the positive attributes of the Greater Norwich area which we support, in respect of employment land, whilst a focus on the high value sectors such as engineering, health and food technology is to be welcomed, overreliance on long allocated employment sites, many of which are constrained, may limit the ability of Greater Norwich to maximise its potential.

The Local Plan evidence base recognises there is a robust demand for office, industrial and retail units in Greater Norwich (across Greater Norwich, vacant and available industrial and office floor space has fallen over recent years whilst occupancy rates have risen). Sectors such as food, health, logistics, Knowledge Intensive Business Services (KIBS) and technology are likely to show

increasing demand for floorspace and sites in Greater Norwich. There is a recognised shortage of good quality industrial stock which may restrict the sub region in meeting its growth potential.

Many of the long-allocated employment and development sites in the Greater Norwich area have an infrastructure deficit (amongst other constraints) which is fettering their ability to come forward. KES2 could be a further example of this. In its current form, KES2 is unable to deliver the infrastructure that unlocks its potential for job creation and bring about improvements to the highway network (which is of clear, further public benefit).

It is considered that the GNLP now needs to recognise that there are weaknesses within the identified employment land supply pipeline set out within the Reg 18 document, and the opportunity to capitalise on sustainably located and deliverable employment land, that can be made available to the market promptly (such as the site subject of this submission), should not be lost.

In addition to the position we have outlined above in respect of the availability of good employment land, in terms of general growth projections in the local plan and the housing requirement, it is noted that the plan predicts the need for circa 7,000 new homes over the plan period. This is considered to be low and a more realistic assessment of the requirement would lead to a figure of between 11,000-14,000 homes in order to deliver City Deal jobs growth aspirations.

Job Targets

3. Which option do you support for jobs growth?

There is a recognition in the Regulation 18 consultation of the positive attributes of the Greater Norwich area, which are supported, however to ensure a bright and prosperous future an ambitious strategy is essential, which also respects existing key characteristics.

The Greater Norwich Local Plan is an opportunity to make the wider Norwich area a hub for investment, commercial activity and high-quality place making, which will be of benefit to all who live and work there, building on significant existing attributes.

There are good prospects to grow the local economy and an enhanced forecast of circa 45, 000 jobs over the plan period is supported. As such, we support the favoured option in respect of jobs growth, which is to deliver forecast jobs growth plus additional growth (Option JT1).

Calculating the Housing Numbers for the Plan

4. Do you agree that the OAN for 2017-2036 is around 39,000 homes?

The overall housing requirement number of 7, 200 dwellings derived from an OAN of around 39,000 is not supported and is considered to be too low.

The GNLP's 2016 call for sites consultation considered that sites for around 12,000 new homes were needed. It is surprising that this has reduced so significantly to 7, 200 for this round of consultation. We are very doubtful that this figure is sufficient to meet the housing requirement for Greater Norwich for the period to 2036 and to support the targeted jobs growth.

We do not support the figure of 7, 200 homes arising from the use of the draft Government methodology for the calculation of housing numbers. Para 4.17 of the Growth Options Document states that the OAN figure for Greater Norwich is 38, 988 dwellings for 2017 - 2036 based upon this methodology. This figure should be used with caution because it uses figures taken from the 'application' of a proposed formula for assessing housing need, with contextual data' table that accompanies the Government Consultation document. This is an indicative assessment of dwellings per annum need based upon a draft formula for the period 2016-2026, rather than for the period 2017 -2036. Furthermore, it does not consider economic objectives for the area.

The calculation of the OAN should in any event be only a starting point for calculating housing numbers for the plan. The Government OAN figure does not include the housing necessary to deliver economic objectives via the City Deal which has been agreed with Central Government in order to help turn knowledge into growth and 13,000 additional jobs. Delivery of these objectives is necessary to ensure that the area is eligible to receive the related Government funding for infrastructure and business support, enterprise and innovation that is due from this. We consider that it is important that the City Deal requirements are included as they have already been committed to and will contribute to the Greater Norwich and wider economy.

Plan makers are entitled to utilise different methods of assessing need to the Government's draft methodology and if these produce figures that are higher, the Government proposes that Inspectors should consider such approaches sound unless there are compelling reasons to indicate otherwise. Therefore, where it is sensible to propose higher figures based on employment growth or higher affordable housing needs there is scope to do this and the "significant contribution" that Government sees the City Deal making "to the recovery and future growth of the UK economy" (source: Greater Norwich City Deal) is valid justification for this.

Paragraph 158 of the NPPF requires that Local Plans ensure that strategies for housing and employment set out in their plans are integrated and take full account of relevant market and economic signals. Not to include the City Deal requirements would be a failure to meet this requirement.

If the City Deal housing requirements are added to the Government OAN figures the housing requirement for the period 2017-2036 should be circa 14,000.

We consider that the up to date Strategic Housing Market Assessment June 2017 figures for the calculation of the housing requirement should be used until the Government's methodology is formally put into practice. The SHMA sets out a Policy on full objectively assessed need for housing for the period 2015-36 for the Greater Norwich Area of 44,714 **including** the City Deal housing requirement (Figure 96: Central Norfolk Strategic Housing Market Assessment 2017). This would indicate a residual requirement of 10,859 homes 2015-2036 taking into account a 20% buffer.

It is important that the City Deal requirements are not ignored and are included in the final housing requirement figure as they have already been committed to and will contribute to the Greater Norwich and wider economy. This should be the case whether the Government or SHMA OAN methodology is used.

Both scenarios suggest that the housing requirement to 2036 should be significantly **higher** than the 7,200 homes specified in the Growth Options Document and a figure in the range of 11,000 to 14,000 would be more appropriate.

5. Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?

6. Do you agree that windfall development should be in addition to the 7,200 homes?

Delivering Infrastructure

7. Are there any infrastructure requirements needed to support the overall scale of growth?

Inevitably with any significant housing and employment growth there will be supporting infrastructure requirements. It is essential that these are properly planned for at the outset. There is a need for investment particularly on key infrastructure. The opening of the NDR will help to facilitate growth to the east and north of the city. It is also likely that improvements will be required to the A47 southern bypass junctions, e.g. Thickthorn, Longwater to ensure sufficient capacity. Opportunities for better public transport linkages including rail and bus also need to be properly considered.

Notably, the site subject of this submission is located in close proximity to the Trunk Road network (A47 linking to A11) at the A140 / A47 interchange and which is currently not constrained in the way other interchanges such as Thickthorn and Longwater are.

How should Greater Norwich grow?

Existing Housing Commitment

8. Is there any evidence that the existing housing commitment will not be delivered by 2036?

The Growth Options (options on pg.39-40)

9. Which alternative or alternatives do you favour?

We broadly support Option 3 'Supporting the Cambridge to Norwich Hi-Tech Corridor'. However, we recognise the merits of siting employment land in transport corridors close to principle sustainable settlements and as such the principle of Option 2 'Transport Corridors' in respect of the siting of employment land, is recognised.

Broadly, Option 3 is supported because it would ensure that the proposed housing growth is closely aligned with the ambitions of the New Anglia LEP Strategic Economic Plan which aims to deliver economic growth in identified Growth locations including Greater Norwich to build on the City Deal.

Option 3 will provide the best support to enable the jobs potential of the Hi-Tech corridor to be realised in addition to jobs growth associated with the city centre, NRP and airport.

Option 3 provides the opportunity to focus significant growth in an area which could effectively create an extension of the Cambridge, Milton Keynes, Oxford corridor, which will be the subject of significant investment. In order to compete effectively with and benefit from Cambridge regional growth, this option is essential.

10. Do you know of any infrastructure constraints associated with any of the growth options?

11. Are there any other strategic growth options that should be considered?

12. Do you support the long-term development of a new settlement or settlements?

Green Belt

13. Do you support the establishment of a Green Belt? If you do, what are the relevant “exceptional circumstances”, which areas should be included, and which areas should be identified for growth up to and beyond 2036?

We do not support the establishment of a Green Belt. This would only serve to restrict the potential availability of employment land in sustainable locations around the City and potentially push development further into the countryside in order to achieve a protected area around Norwich. This would be unsustainable because it would increase the length and number of journeys into the city and would be likely to have a greater environmental impact on countryside locations.

Norwich City Centre
Defining the City Centre Area

14. Should the area defined as the city centre be extended?

Strategic City Centre Policy

15. Do you support the approach to strategic planning for the city centre in 4.80 above?

City Centre Offices

16. What should the plan do to reduce office losses and promote new office development in the city centre?

Retailing

17. What should the plan do to promote retailing in the city centre?

Leisure and Late Night Activity Zone

18. Should the focus for late night activities remain at Riverside, Prince of Wales Road, and Tombland, or should a more flexible approach be taken?

City Centre Housing
19. What should the plan do to promote housing development in the city centre?
Cultural, Visitor and Education Facilities
20. How can the plan best support cultural, visitor and educational uses in the city centre?
Remainder of the Norwich Urban Area and the Fringe Parishes
21. Do you support Option UA1 for the remainder of the urban area and the fringe parishes?
Main Towns
22. Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?
Settlement Hierarchy
23. Do you agree with the approach to the top three tiers of the hierarchy?
24. Do you favour option SH1, and are the villages shown in appendix 3 correctly placed?
25. Do you favour the Village Cluster approach in option SH2?
25a. What criteria should be used to define clusters?
25b. Which specific villages could form clusters?
25c. How could growth be allocated between villages within a cluster?
The Influence of the Norwich Urban Area
26. Do you support a Norwich centred policy area and, if so, why and on what boundaries?
Section 6 – Topic Policies
The Economy
The Supply of Employment Land
27. What option or options do you support? (refers to options on pg.71-2) <p>The NPPF states that one of the key strands of the planning system is that it has an economic role and should contribute to building a strong, responsive and competitive economy, by ensuring that “...the sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure”. (Para 7 NPPF)</p> <p>The NPPF goes on to say that planning policies should “.....avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed”. (Para 22 NPPF)</p> <p>The GNLP evidence base recognises there is robust demand for office, industrial and retail units in Greater Norwich (across Greater Norwich, vacant and available industrial and office floor space has fallen over recent years whilst occupancy rates have risen). Sectors such as food, health, logistics, Knowledge Intensive Business Services (KIBS) and technology are likely to show increasing demand for floorspace and sites in Greater Norwich. There is a recognised shortage of good quality industrial stock which may restrict the sub region in meeting its growth potential.</p>

In December 2016 it was anticipated that there would be a shortage of good quality industrial retail stock which may lead to the sub region not meeting investment potential. Vacant and available industrial office and floorspace has fallen recently and occupancy rates have risen.

In addition, business use class floorspace continues to be lost to Permitted Development schemes.

There are recent examples of the desire to invest in Greater Norwich such as the completion of large industrial units in Wymondham.

Norwich has a series of allocated/opportunity sites proximately located to existing sites to support expansion and sector specific growth. Many of the long-allocated employment and development sites in the Greater Norwich area have an infrastructure deficit (amongst other constraints) which is fettering their ability to come forward. KES2 is likely to end up in the same position. In its current form, KES2 is unable to deliver the infrastructure that unlocks its potential for job creation and bring about improvements to the highway network (which is of clear, further public benefit).

The critical factors that facilitate the take up and delivery of employment land range from land value; siting and location; demand; and infrastructure provision / cost of servicing.

Numerous of these factors affect many of the currently (and long) allocated sites within the Greater Norwich Area. The emerging local plan states that the Greater Norwich area has circa 340 hectares of undeveloped employment land. When balanced against identified demand as set out in the evidence base ('enhanced scenario' of 114 hectares over the plan period) would suggest that there is the potential employment land to meet demand 3 times over.

This assessment is clearly too simplistic and the figures within the emerging plan are overoptimistic and should be treated with caution. The potential supply figure is made up of the following:

- Allocated employment sites.
- 'Call for sites' employment sites.

Clearly the 'call for sites' element, at this point is untested and cannot be relied upon (but clearly presents some potential for sustainably located employment land).

In respect of the allocated sites. Whilst, a forensic analysis has not been undertaken of all the sites listed in Appendix 1 of the Employment Land Assessment (GVA December 2017), numerous of these sites have inherent problems that hinder their delivery such as infrastructure constraints; poor land values; landownership models. In addition, many of these sites whilst allocated, are situated in rural and potentially unsustainable locations. This is evidenced in the GNDP Annual Monitoring Report March 2018 that is unable to demonstrate meeting targets in respect of newly permitted B1, B2 and B8 floorspace and which shows there has been a sustained loss of employment floorspace in Norwich across all use classes.

As such, these factors do not apply to the site subject of this submission.

In addition to the AMR assessment, commercial agents report the following trends in the take up of 'industrial' buildings in Norwich:

- Since 2012, as we have seen a general economic recovery, there has been increasing take up of industrial land with very little new supply.
- There is a large amount of what is termed '2nd hand poor' floorspace on the market.
- There has been no new Grade A office supply since 2013.
- As supply decreases, the market is / will become constrained.
- The bulk of demand is for units of 1, 000 - 2,000 sq. metres of floorspace (and where there appears to be a lack of supply).

It is considered that going forward the GNL now needs to recognise that there are weaknesses within the identified employment land supply pipeline as set out set out within the Reg 18 document, and the opportunity to capitalise on sustainably located and deliverable employment land, that can be made available to the market promptly (such as the site subject of this submission), should not be lost. A wide range of good employment sites need to be maintained to not only attract new business to Norwich but also to retain existing ones, who may be considering relocating (the loss of Colmans is particularly pertinent to this final point).

We note that the evidence base does acknowledge this problem (ELR paragraph 7.10) which states that whilst a large quantity of land could potentially be available for employment use, it is the quality of this land that is key and its ability to meet demand from different growth sectors.

The site subject of this submission is sustainably located with good transport links and will be able to take advantage of different market sectors.

In respect of the three alternative scenarios for the supply of employment land (Options EC1 to EC3) as suggested in the consultation document, our view is that a combined approach of:

- i) providing certainty through the allocation of deliverable sites, and;
- ii) inclusion of a criteria-based policy to allow windfall, should be pursued.

We acknowledge / agree that a healthy supply of viable sustainably located employment allocations / land should be included within the Local Plan. In accordance with the NPPF existing sites making up supply should be assessed and those with little prospect of coming forward should be removed from supply. Flexibility should be provided in the plan through a criteria-based approach for non- allocated land. There will (by April 2018) be a legal obligation on LPA's to review local plans every 5 years and as such, this gives the opportunity for allocations to be thoroughly reviewed over this period.

28. Which allocated or existing employment sites should be identified as strategic sites and protected?

29. Are there employment areas that should be identified as suitable for release for residential uses?

30. Are there any new employment sites that should be allocated?

The land subject of this submission should now be allocated the local plan. The site presents the opportunity, in combination with KES2, to provide land for additional employment floorspace in a sustainable location and in a sustainable manner and contribute to the challenge of providing 45,000 jobs in the Greater Norwich Area over the plan period.

It is considered that the site, in combination with KES2, would have the capacity to deliver in the region of 30,000 sq. meters of employment floorspace across the 'B' uses and potentially other employment generating uses. A development of this nature could deliver in excess of 1000 jobs (when applying the *HCA Density Guide, Second Edition 2015* of 12 sq. m per job for B1; 36 sq m per job for B2; 70 sq m per job for B8; and based on an equitable split across the 30,000 sq m that could be accommodated at this site).

An expanded allocation has been tested and would be viable and deliverable both in respect of delivering a link road between the A140 and the B1113 (providing wider public benefit); and the infrastructure necessary to provide servicing to the site. This means an expanded KES2 allocation could be made available to the market quickly and would not be fettered by infrastructure burdens as other allocations experience. Whilst the viability assessment is a commercial / confidential document, it can be made available in due course to both the GNLN Officers and the Inspector appointed to Examine the plan.

In respect of demand, the promoter of the site has had substantial interest from the market since 2018. The site presents the opportunity to attract operators in the food, health, logistics, Knowledge and Intensive Business Services (KIBS) and technology sectors as well as more conventional office, light industrial and storage and distribution operators. A masterplan has been developed for the site, which has been the subject of a recent planning application (See **Appendix 3**) and which shows one way in which operators could be accommodated.

The location of the site is already acknowledged to be a sustainable one as demonstrated by the allocation of employment land at KES2.

The GNLN team's assessment of the site as set out in the Site Proposals document is that if *"...if further employment land is required in the Norwich fringe area, GNLN0497 could be suitable, subject to mitigation."*

As set out in responses to other questions, we have made the case for the review of the current employment land supply position and where we submit, that sites making up supply should be reviewed and removed where inappropriate, and other sites should be allocated where they can be found to be sustainably located and viable (as is this one).

Mitigation has been included within the masterplan and when assessed (from a landscape impact perspective), is found to be appropriate and acceptable in this location (see LVIA in **Appendix 2**).

Accommodating Expenditure Growth

31. Should the position of any of the centres in the retail hierarchy be changed?

32. Do any of the existing retail centres have scope to expand to accommodate further floorspace?

The Rural Economy

33. What measures could the GNLN introduce to boost the rural economy?

Access and Transportation

Strategic Transport Issues
34. Are there any other specific strategic transport improvements the GNLP should support?
Promoting Healthier Lifestyles, Sustainable Travel Choices and Greater Accessibility to Broadband
35. Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area?
Design Options
36. What approach do you support for promoting good design of new development?
Housing Minimum Affordable Housing Threshold
37. Which approach to affordable housing thresholds do you prefer?
Application of Affordable Housing Percentage Requirements on Sites
38. What approach do you favour for affordable housing percentages? (refers to options on pg.87)
Tenure Split for Affordable Housing
39. Do you support the favoured option for tenure split?
Rural Windfall, Exception Sites and Small Sites
40. Which approach do you think should be taken to rural windfall and exceptions sites? (refers to options on pg.89-90)
Housing Mix – Relative Ratios of House Sizes by Bedrooms
41. Which approach to the mix of housing do you support? (refers to options on pg.92)
Housing with Care, Extra-Care Housing and Retirement Housing
42. Which approach or approaches to housing for older people and care accommodation do you favour?
Houseboats
43. Which of the reasonable alternatives for houseboats do you favour?
Gypsies and Travellers
44. Which policy approach do you favour to planning for the needs of Gypsies and Travellers?
45. Are there any suitable sites for Gypsy and Traveller accommodation you wish to submit?
Travelling Showpeople
46. Do you support the favoured option for planning for the needs of Travelling Showpeople?
47. Are there any suitable sites for Travelling Showpeople accommodation you wish to submit?

Residential Caravans/Park Homes
48. Do you support the favoured option for residential caravans and park homes?
49. Are there any potential locations for new/expanded residential caravan sites that you wish to propose?
Climate Change
50. Do you support the favoured option for climate change policy?
Air Quality
How Should Air Quality be Covered in the GNLP?
51. Which approach do you favour for air quality? (refers to options on pg.104-5)
Flooding
How Should Flooding and Flood Risk be Covered in the GNLP?
52. Do you support the favoured option for flood risk policy?
Nature Conservation, Green Infrastructure and Habitats Regulation Assessment Mitigation
How Should Nature Conservation and Green Infrastructure be Covered in the GNLP?
53. Which option do you support? (refers to options on pg.111)
54. Do you think any changes should be made to the Green Infrastructure network?
Landscape
Landscape Character and Protection
55. Which of these options do you favour? (refers to options on pg.115)
<p>We recognise the need to protect sensitive landscapes and river valleys, but these landscapes are generally subject to existing other levels of protection. We also understand the need to prevent coalescence between existing settlements to protect townscape character and to enable resident populations to have direct access to countryside recreation and benefits. Nevertheless, we object in the strongest possible terms to approaches outlined in options LA1 and LA2 especially the protection of the route of the NNDR that has no real landscape merit (one of the key reasons the route was selected and evidenced in the original submission documents) and is designed to facilitate access to new future planned growth areas.</p> <p>Both approaches favour the blanket application of Green Belt-type constraint policies for no valid landscape and/or planning reasons when (due largely to a lack of brownfield land supply within the City) the outward expansion of Norwich into the fringe parishes is inevitable. Indeed, the current growth strategy for Norwich as contained in the adopted Joint Core Strategy acknowledges that the Norwich Policy area that is the countryside beyond the existing urban edge is the most sustainable location for new housing and employment growth.</p>

We favour a new option that seeks to deliver a proper planning approach to development and one that allocates sufficient deliverable and viable employment sites to meet real-time needs (including City Deal growth requirements).

Strategic Gaps

56. Should the GNLP protect additional Strategic Gaps and if so where should these be?

We do not agree that new Strategic Gaps are required within the Greater Norwich Local Plan area to separate existing settlements. This is because similarly worded countryside policies already acting as development constraints already exist and this type of quasi-Green Belt-type policy is not required.

Energy

57. Should option EN1 be included in the GNLP?

Water

58. Do you support option W1?

Communities

Location of Affordable Housing within Sites

59. Do you support option COM1 for the distribution of affordable housing?

Health Impact Assessments

60. Which option do you support? (refers to options on pg.123)

Neighbourhood Planning

61. Do you support option NP1? If so, which GNLP policies should be “strategic”?

Culture

How Should Culture be Covered in the GNLP?

62. Which option do you support? (refers to options on pg.126-7)

The Broads

63. Do you support option BR1?

Section 7 – Monitoring the Plan

Monitoring of the GNLP

64. Are there any current indicators that should be excluded or included in the GNLP monitoring framework?

The existing indicators on which the JCS is monitored are considered appropriate to carry forward. Additional indicators that could be included are:

- the proportion of employment land that is being delivered on non-allocated sites.
- The proportion of employment land lost to residential.
- The proportion of employment uses lost through Permitted Development.
- Trends on supply / demand and take up rates could be included.

Shortfall in Housing Land Supply

65. Which option do you support? (refers to options on pg.131-2)

<i>General Questions</i>

66. Are there any other issues relating to the GNLP you would like to raise?

6. Site Assessment

The HELAA capacity assessment December 2017 has assessed the suitability and availability of sites for residential development in broad terms by means of a desk top assessment and advice from a range of technical consultees. It identifies potential constraints to development and/or impacts of developing a site which may need further investigation and additional measures to facilitate development e.g. additional infrastructure or mitigation.

The HELAA states the following in respect of the submission site:

“This site lies between the A140 and B1113 and is proposed for employment uses. There are some services within walking distance. Initial highway evidence has indicated that a suitable access may be possible. Sewerage infrastructure upgrades may be required, including to the water recycling centre. The site contains areas at risk of flooding and is within the southern bypass protection zone. The site is close to the current, and remains of the previous, church of All Saints, and could impact on its setting. Ecological mitigation would also be required for habitat on site. There are no known constraints from utilities infrastructure, contamination or ground instability, and there would be no loss of open space. Although the site has some constraints, it is considered suitable for employment for the purposes of the land availability assessment.”

In respect of the matters raised above, these have been resolved through the submission of previous planning applications (Refs: 2016/0764 and 2017/2794). In addition, other matters have been addressed through these applications.

- Norfolk County Council the Highways authority have confirmed that the access arrangement to the site is acceptable, as are the sustainable transport measures proposed.
- Traffic impact is acceptable and will bring about improvements to the highway network.
- The site is in Flood Zone 1 and the flood risk assessment supporting the planning applications has established that the development is acceptable. The site is not at risk of flooding.
- Landscape impact is limited to views from the west.
- South Norfolk Council Heritage and Design Officer agrees with the promoters heritage consultant that there will be no adverse impact on the setting of the Listed Church.
- The ecological value of the site is extremely low and limited to the field boundaries and margins. No protected species are affected. No objections have been raised by consultees in respect of ecology.
- There is good access to services including the Tesco superstore and the site is clearly in a sustainable location.
- There is clear demand for a commercial scheme of this nature.

Clearly the planning applications are supported by a full range of technical assessments. This has enabled us to assess the suitability of the site when compared against the HELAA assessment (as set out in the table below):

Constraints Analysis	HELAA Assessment	Lanpro Assessment
Access	Yellow	Green
Accessibility to Services	Yellow	Yellow
Utilities Capacity	Yellow	Green
Utilities Infrastructure	Green	Green
Contamination and Ground Stability	Green	Green
Flood Risk	Yellow	Green
Market Attractiveness	Yellow	Green
Impacts Analysis		
Significant Landscapes	Yellow	Yellow
Townscapes	Green	Green
Biodiversity and Geo-diversity	Yellow	Green
Historic Environment	Yellow	Green
Open space and GI	Green	Green
Transport and Roads	Yellow	Green
Compatibility with Neighbouring uses.	Green	Green

7. Conclusions

The site presents the opportunity, in combination with an existing allocation (KES2), to provide land for additional employment floorspace in a sustainable location and in a sustainable manner and contribute to the challenge of providing 45,000 jobs in the Greater Norwich Area over the plan period. It is considered that the site, in combination with KES2, would have the capacity to deliver in the region of 30, 000 sq. meters of employment floorspace across the 'B' uses and potentially other employment generating uses. A development of this nature could deliver circa 1000 new jobs.

KES requires the delivery of a link road between the A140 and the B1113. An expanded KES2 allocation as envisaged by this submission, would facilitate the delivery of this link road whereas in isolation, KES2 cannot deliver the link road. This has been established through a Viability Assessment (VA). The VA has informed the amount of land-take that is proposed in this submission and which is only that amount needed to accommodate a commercial development of circa 30, 000 sq. m that will fund the highway infrastructure and deliver the public benefit.

It is considered that going forward the GNLP now needs to recognise that there are weaknesses within the identified employment land supply pipeline across the Greater Norwich Area and as set out within the Reg 18 document, and the opportunity to capitalise on sustainably located and deliverable employment land, that can be made available to the market promptly (such as the site subject of this submission), should not be lost.

An expanded allocation has been tested and would be viable and deliverable both in respect of delivering a link road between the A140 and the B1113 (providing wider public benefit); and the infrastructure necessary to provide servicing to the site. This means an expanded KES2 allocation could be made available to the market quickly and would not be fettered by infrastructure burdens as other allocation experience (including KES2 in its current form).

In respect of demand, the promoter of the site has had substantial interest from the market since 2018. The site presents the opportunity to attract operators in the food, health, logistics, Knowledge and Intensive Business Services (KIBS) and technology sectors as well as more conventional office, light industrial and storage and distribution operators. A masterplan has been developed for the site, which has been subject of a recent planning application (See **Appendix 3**) and which shows one way in which operators could be accommodated.

8. Next Steps

An outline planning application is currently submitted for the development of the submission site in combination with KES2.

The owner / promoter will continue to promote the site through the local plan process.

We would be pleased to meet with the GNLP Officers to discuss the site in due course if required.

Further technical information and the viability assessment relating to the site can be supplied if required.



Appendices

Appendix 1 – Site Boundary Plan and Proposal Plan



NOTES

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These duties can be found at.

<http://www.hse.gov.uk/construction/cdm/2015/responsibilities.htm>

It is your responsibility as client to make yourself aware of your role within CDM 2015 and act accordingly.

Site Area: 8.13 ha

— Site Boundary

← Access

▨ Proposed road and changes to B1113

▨ Employment Allocated Site

■ Employable Developable Area

■ Mitigation Landscaping

PURPOSE OF ISSUE PL - for Planning Submission	RIBA STAGE
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DRAWING STATUS S2 - Fit for Information

PROJECT TITLE Harford

CLIENT MAHB Capital

DRAWING TITLE Proposals Plan	SCALE 1:1250@A3
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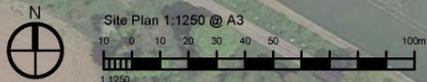
DATE March 2018	DRAWN BY SF	CHECKED BY ID	APPROVED BY -
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PROJECT NO 0351	TYPE - 00	UNIQUE NO - 602	REVISION -



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Appendix 2 - Landscape and Visual Impact Assessment

Please refer to the LVIA within the submitted application documents for the application 2017/2794 to South Norfolk District Council. Available at:

<https://info.south-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=P0LJ5LOQI4500>



Appendix 3 - Expanded KES2 Site Masterplan



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Key:

Gross Floor Area 28,329m²

- B1..... 9,443m²
- B2..... 9,443m²
- B8..... 9,443m²

Application boundary 12.7Ha

- A. Operational Development Area 78,446m²
- B. Green Buffer Area - 48,554m²

PURPOSE OF ISSUE
 MA for Masterplan

DRAWING STATUS
 S2 - Fit for Information

PROJECT TITLE
 0351 Harford

CLIENT
 Heritage Development

DRAWING TITLE
 Illustrative Masterplan

SCALE 1 : 2500@A3	DATE 27/11/17	DRAWN BY DO	CHECKED BY TU
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DRAWING NUMBER			
PROJECT NO 0351	TYPE - 00	UNIQUE NO - 401	REVISION -



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