

Greater Norwich Site Submission Form

FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

This form is to be filled out by any interested parties who want to promote a site for a specific use or development to be allocated in the Greater Norwich Local Plan.

Only one form should be submitted for each individual site i.e. it is not necessary for a separate form to be completed for each landowner on a single site in multiple ownerships. However, a separate form must be completed for each individual site submitted.

Your completed form should be returned to the Greater Norwich Local Plan team:

By email: gnlp@norfolk.gov.uk

Or, if it is not possible submit the form electronically,

By Post to:

Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX

The site submissions received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be published and made available for public viewing. By submitting this form you are consenting to the details about you and your individual site(s) being stored by Norfolk County Council and shared with Broadland District Council, Norwich City Council and South Norfolk District Council, and that the details of the site will be published for consultation purposes. Under the (GDPR) General Data Protection Regulation Norfolk County Council will be the data controller.

Further advice and guidance can be obtained by visiting the Greater Norwich Local Plan website or by contacting the Greater Norwich Local Plan team directly:

Website: www.gnlp.org.uk
E-mail: gnlp@norfolk.gov.uk
Telephone: 01603 306603

1a. Contact Details	
Title	Mrs
First Name	Georgina
Last Name	Brotherton
Job Title (where relevant)	Technical Director
Organisation (where relevant)	Lawson Planning Partnership Ltd
Address	882 The Crescent, Colchester Business Park, Colchester
Post Code	CO4 9YQ
Telephone Number	01206 835150
Email Address	georginabrotherton@lppartnership.co.uk

1b. I am...	
Owner of the site <input type="checkbox"/>	Parish/Town Council <input type="checkbox"/>
Developer <input type="checkbox"/>	Community Group <input type="checkbox"/>
Land Agent <input type="checkbox"/>	Local Resident <input type="checkbox"/>
Planning Consultant <input checked="" type="checkbox"/> x	Registered Social Landlord <input type="checkbox"/>
Other (please specify):	

1c. Client/Landowner Details (if different from question 1a)	
Title	

First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	Horsham Properties Ltd
Address	C/O Lawson Planning Partnership Ltd
Post Code	
Telephone Number	
Email Address	

2. Site Details	
<p>Site location / address and post code</p> <p>(please include as an attachment to this response form a location plan of the site on a scaled OS base with the boundaries of the site clearly shown)</p>	<p>Land north of Abbey Farm Commercial Park, Horsham St Faith, Norfolk, NR10 3JU</p>
Grid reference (if known)	
Site area (hectares)	0.9ha

Site Ownership

3a. I (or my client)....		
Is the sole owner of the site	Is a part owner of the site	Do/Does not own (or hold any legal interest in) the site whatsoever
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3b. Please provide the name, address and contact details of the site's landowner(s) and attach copies of all relevant title plans and deeds (if available).		
3c. If the site is in multiple landownerships do all landowners support your proposal for the site?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3d. If you answered no to the above question please provide details of why not all of the sites owners support your proposals for the site.		

Current and Historic Land Uses		
4a. Current Land Use (Please describe the site's current land use e.g. agriculture, employment, unused/vacant etc.)		
Former agricultural land		
4b. Has the site been previously developed?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4c. Describe any previous uses of the site. (please provide details of any relevant historic planning applications, including application numbers if known)		

Proposed Future Uses

5a. Please provide a short description of the development or land use you proposed, including stating if it is for a settlement boundary revision (if you are proposing a site to be designated as local green space please go directly to question 6).

It is requested that a proposed 0.9 hectare northern extension to the Commercial Park for employment use (B1, B2 and B8) is allocated in the new GNLP. The proposals envisage the provision of a single building to the north of Block L supported by structural landscaping. The further building would provide additional capacity for the Commercial Park in addition to the western employment land allocation to enable a modest expansion to the north during the Plan period. The site is currently situated outside of the settlement boundary of Horsham St Faith.

5b. Which of the following use or uses are you proposing?

Market Housing <input type="checkbox"/>	Business and offices <input checked="" type="checkbox"/>	Recreation & Leisure <input type="checkbox"/>
Affordable Housing <input type="checkbox"/>	General industrial <input checked="" type="checkbox"/>	Community Use <input type="checkbox"/>
Residential Care Home <input type="checkbox"/>	Storage and distribution <input checked="" type="checkbox"/>	Public Open Space <input type="checkbox"/>
Gypsy and Traveller Pitches <input type="checkbox"/>	Tourism <input type="checkbox"/>	Other (Please Specify) <input type="checkbox"/>

5c. Please provide further details of your proposal, including details on number of houses and proposed floorspace of commercial buildings etc.

The commercial building envisaged would be similar in scale to the recently constructed Block L and would provide an overall additional floorspace in the region of 1800m². The proposed building will relate to and reflect the general profile and scale of the existing buildings but with a more contemporary appearance and responding to the rural setting in line with the recently constructed Block L.

The proposed single block would be served by either the existing main vehicular access into the Commercial Park from Church Road, or by the proposed vehicular access from Church Road proposed as part of the western extension.

5d. Please describe any benefits to the Local Area that the development of the site could provide.

In summary, the small but important allocation of 0.9 hectares of land to the north of the Commercial Park would contribute towards business, general industrial and warehousing accommodation within Broadland and would create economic benefits for the area, including the creation of jobs. The land's allocation would result in the provision on one additional building to the north of the Commercial Park, together with structural landscaping and forms a logical final extension to the north.

Local Green Space

If you are proposed a site to be designated as Local Green Space please complete the following questions. These questions do not need to be completed if you are not proposing a site as Local Green Space. Please consult the guidance notes for an explanation of Local Green Space Designations.

6a. Which community would the site serve and how would the designation of the site benefit that community.

6b. Please describe why you consider the site to be of particular local significance e.g. recreational value, tranquillity or richness in wildlife.

Site Features and Constraints

Are there any features of the site or limitations that may constrain development on this site (please give details)?

7a. Site Access: Is there a current means of access to the site from the public highway, does this access need to be improved before development can take place and are there any public rights of way that cross or adjoin the site?

The proposed single block would be served by either the existing main vehicular access into the Commercial Park from Church Road, or by the proposed vehicular access from Church Road proposed as part of the western extension. The building would be served off the existing estate road that runs to the north of Block L and forms a logical completion of the Commercial Park to the north.

7b. Topography: Are there any slopes or significant changes of in levels that could affect the development of the site?

No

7c. Ground Conditions: Are ground conditions on the site stable? Are there potential ground contamination issues?
The site has no recorded history of presence of contamination.
7d. Flood Risk: Is the site liable to river, ground water or surface water flooding and if so what is the nature, source and frequency of the flooding?
In flood risk terms, the site is located within Flood Zone 1, where the risk of tidal or fluvial flooding is considered as low.
7e. Legal Issues: Is there land in third party ownership, or access rights, which must be acquired to develop the site, do any restrictive covenants exist, are there any existing tenancies?
No
7f. Environmental Issues: Is the site located next to a watercourse or mature woodland, are there any significant trees or hedgerows crossing or bordering the site are there any known features of ecological or geological importance on or adjacent to the site?
In 2018/2019, ecological surveys were undertaken of the land north of Block L and the report concluded that this area is of low ecological value with no statutory protected species located within 2km of the site. The report states that no significant ecological constraints were identified that would adversely affect the proposed development at the site, subject to the mitigation measures suggested within the report being undertaken. The report concludes that with the recommended mitigation and suggested enhancements incorporated into the layout, there is an opportunity to enhance the value of the site for local wildlife, resulting in a net gain for biodiversity, as is encouraged by the National Planning Policy Framework.
7g. Heritage Issues: Are there any listed buildings, Conservation Areas, Historic Parklands or Schedules Monuments on the site or nearby? If so, how might the site's development affect them?
There are no heritage assets on the site, however, adjacent to the Commercial Park's eastern boundary is St Faith's Priory and St Mary's and St Andrew's Church. St Faith's Priory is a Grade I listed property, currently in residential use, the grounds of which comprise a Scheduled Monument and once formed a medieval, Benedictine Priory. The Church is also Grade I listed. These heritage assets, including a landscaped area in the south east corner of the Commercial Park, lie within Horsham St Faith's designated Conservation Area. Additional landscaping would mitigate the visual effects of the proposed development on the setting of the settlement and the proposal would not be visible from the heritage assets to the south east due to the existing landscaped bund.
7h. Neighbouring Uses: What are the neighbouring uses and will either the proposed use or neighbouring uses have any implications?

The existing Abbey Farm Commercial Park is located immediately to the south of the site, with a landscaped bund to the east, a further landscape bund to the west and other land within the clients ownership to the north.

7i. Existing uses and Buildings: are there any existing buildings or uses that need to be relocated before the site can be developed.

No

7j. Other: (please specify):

Utilities

8a. Which of the following are likely to be readily available to service the site and enable its development? Please provide details where possible.

	Yes	No	Unsure
Mains water supply	<input checked="" type="checkbox"/> x	<input type="checkbox"/>	<input type="checkbox"/>
Mains sewerage	<input checked="" type="checkbox"/> x	<input type="checkbox"/>	<input type="checkbox"/>
Electricity supply	<input checked="" type="checkbox"/> x	<input type="checkbox"/>	<input type="checkbox"/>
Gas supply	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> x
Public highway	<input checked="" type="checkbox"/> x	<input type="checkbox"/>	<input type="checkbox"/>
Broadband internet	<input checked="" type="checkbox"/> x	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify):			

8b. Please provide any further information on the utilities available on the site:

Availability

9a. Please indicate when the site could be made available for the land use or development proposed.

Immediately	<input checked="" type="checkbox"/>
1 to 5 years (by April 2021)	<input type="checkbox"/>
5 - 10 years (between April 2021 and 2026)	<input type="checkbox"/>
10 – 15 years (between April 2026 and 2031)	<input type="checkbox"/>
15 - 20 years (between April 2031 and 2038)	<input type="checkbox"/>

9b. Please give reasons for the answer given above.

The further building would provide additional capacity for the Commercial Park to meet its short term requirements in addition to the western employment land allocation to enable a modest expansion to the north.

Market Interest		
10. Please choose the most appropriate category below to indicate what level of market interest there is/has been in the site. Please include relevant dates in the comments section.		
	Yes	Comments
Site is owned by a developer/promoter	<input checked="" type="checkbox"/>	The site is owned by the owners of Abbey Farm Commercial Park
Site is under option to a developer/promoter	<input type="checkbox"/>	
Enquiries received	<input type="checkbox"/>	
Site is being marketed	<input type="checkbox"/>	
None	<input type="checkbox"/>	
Not known	<input type="checkbox"/>	

Delivery	
11a. Please indicate when you anticipate the proposed development could be begun.	
Up to 5 years (by April 2021)	<input checked="" type="checkbox"/>
5 - 10 years (between April 2021 and 2026)	<input type="checkbox"/>
10 – 15 years (between April 2026 and 2031)	<input type="checkbox"/>
15 - 20 years (between April 2031 and 2038)	<input type="checkbox"/>
11b. Once started, how many years do you think it would take to complete the proposed development (if known)?	
1 year	

Viability	
12a. You acknowledge that there are likely to be policy requirements and Community Infrastructure Levy (CIL) costs to be met which will be in addition to the other development costs of the site (depending on the type and scale of land use proposed). These requirements are likely to include but are not limited to: Affordable Housing; Sports Pitches & Children’s Play Space and Community Infrastructure Levy	<input checked="" type="checkbox"/>

	Yes	No	Unsure
12b. Do you know if there are there any abnormal costs that could affect the viability of the site e.g. infrastructure, demolition or ground conditions?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

12c. If there are abnormal costs associated with the site please provide details:

12d. Do you consider that the site is currently viable for its proposed use taking into account any and all current planning policy and CIL considerations and other abnormal development costs associated with the site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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12e. Please attach any viability assessment or development appraisal you have undertaken for the site, or any other evidence you consider helps demonstrate the viability of the site.

Other Relevant Information

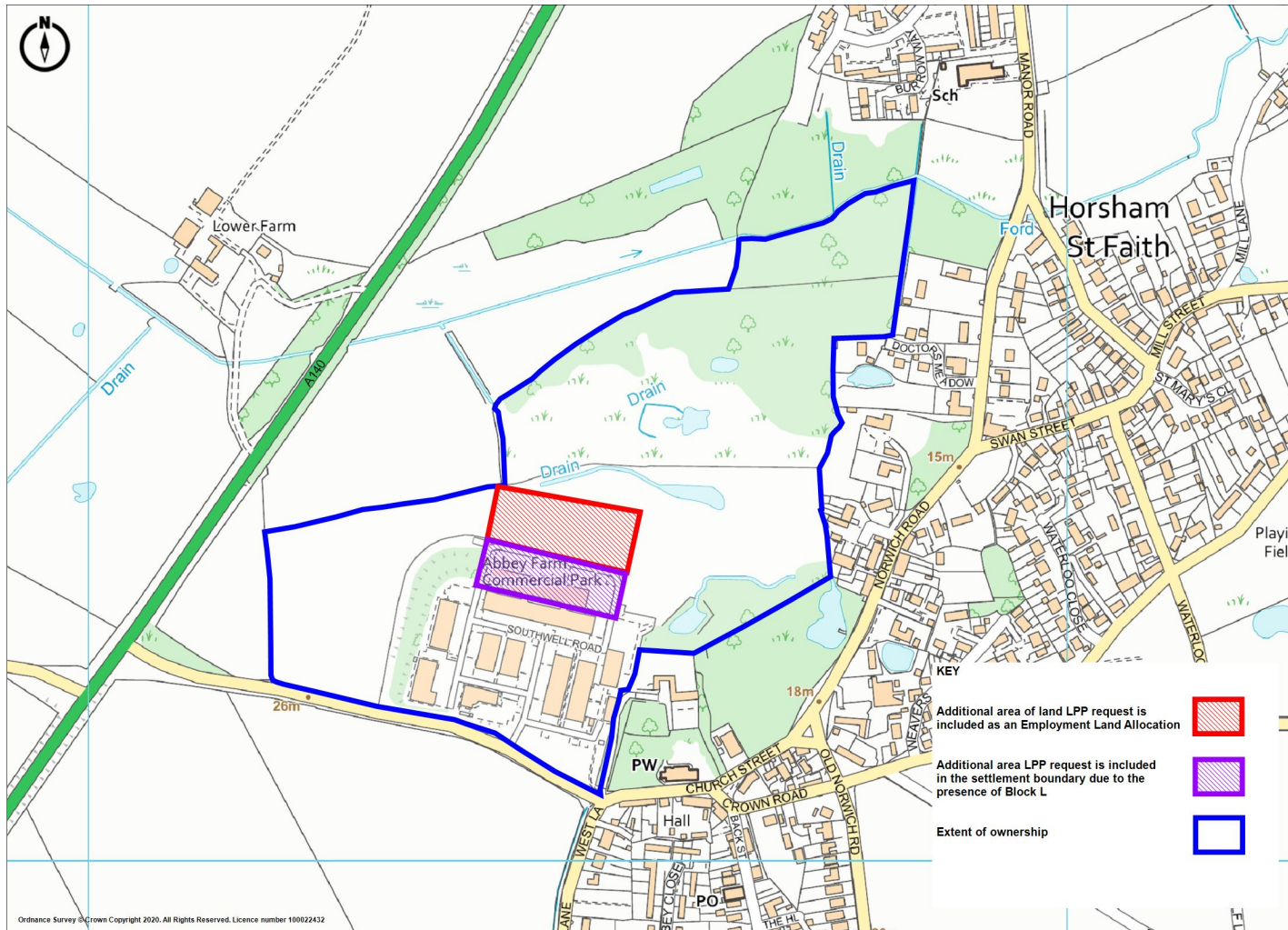
13. Please use the space below to for additional information or further explanations on any of the topics covered in this form

Please see LPP's Statement dated March 2020 for further details relating to this site.

Check List	
Your Details	
Site Details (including site location plan)	
Site Ownership	
Current and Historic Land Uses	
Proposed Future Uses	
Local Green Space (Only to be completed for proposed Local Green Space Designations)	
Site Features and Constraints	
Utilities	
Availability	
Market Interest	
Delivery	
Viability	
Other Relevant Information	
Declaration	

14. Disclaimer	
<p>I understand that: Data Protection and Freedom of Information The Data Controller of this information under the General Data Protection Regulation (GDPR)2018 / Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk District Council. The purposes of collecting this data are:</p> <ul style="list-style-type: none"> • to assist in the preparation of the Greater Norwich Local Plan • to contact you, if necessary, regarding the answers given in your form • to evaluate the development potential of the submitted site for the uses proposed within the form <p>The Site Submission response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be published and made available for public viewing. By submitting this form you are consenting to the details about you and your individual sites being stored by Norfolk County Council, and the details being published for consultation purposes. Any information you consider to be confidential is clearly marked in the submitted response form and you have confirmed with the Council(s) in advance that such information can be kept confidential as instructed in the Greater Norwich Local Plan: Regulation 18 “- Site Submission Guidance Notes.</p> <p>See our Privacy notice here http://www.greaternorwichlocalplan.org.uk/ for information on how we manage your personal information</p> <p>Declaration I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.</p>	
Name	Date
Georgina Brotherton	11 th June 2020

Abbey Farm Commercial Park, Southwell Road, Horsham St Faith, Norwich NR10 3JU
 Land to the North of Abbey Farm - Proposed Employment Land Allocations



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 LANDMARK INFORMATION

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Greater Norwich Local Plan Consultation

**Representations on
behalf of Horsham
Properties Limited in
relation to:**

**Part 1 The Strategy;
Part 2 Site Allocations
& Site Reference HNF3
– Land Allocated for
Employment Uses (B1,
B2, B8)**

**Abbey Farm Commercial Park,
Horsham St Faith**

March 2020

Lawson Planning Partnership Ltd

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Version	Draft	Final
Date	05/03/2020	16/03/2020
Details	Local Plan Statement	Local Plan Statement
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Signed		
Reviewed by	John Lawson BA (Hons), MPhil, MRTPI Managing Director	John Lawson BA (Hons), MPhil, MRTPI Managing Director
Signed		

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Appendices

Appendix 1	Site Plan 001D – Detailing extent of development approved by 2012 permission (20211385)
Appendix 2	Block Plan 051B – Detailing extent of development approved by 2012 permission (20211385)
Appendix 3	Annotated Extract of Horsham & Newton St Faith Site Proposals Map
Appendix 4	Land North of Abbey Farm Commercial Park – Sustainability Assessment

1. Introduction

- 1.1 On behalf of our client, Horsham Properties Ltd and owner of Abbey Farm Commercial Park at Horsham St Faith, we write in respect of the Greater Norwich Local Plan, Regulation 18 - Part 1, The Strategy and Part 2 Site Allocations Consultation, published January 2020.
- 1.2 This statement comprises our representations regarding Site Reference HNF3 – Land at Abbey Farm Commercial Park, Horsham St Faith, that is allocated for employment uses within the Broadland District Council Site Allocations Development Plan Document (2016) and is identified as ‘Carried Forward Employment Allocation’ within the draft Greater Norwich Local Plan (GNLP) (2020).
- 1.3 This statement also considers the policies contained within Part 1 The Strategy set out within the draft GNLP and provides representations in respect of Policy 6 ‘The Economy’, Policy 7.4 ‘Village Clusters’ and responses to questions 6, 10, 15, 34 and 46. A response to each question has also been submitted via the GNLP online consultation portal.
- 1.4 This statement additionally identifies and seeks the allocation of land north of Abbey Farm Commercial Park (0.9 hectares), as a further modest extension to the Commercial Park for employment use.
- 1.5 In summary, our client and site owner of Abbey Farm Commercial Park:
 - ❖ Supports the incorporation of the existing employment allocation (site reference HNF3), land west of Abbey Farm Commercial Park within the Greater Norwich Local Plan (GNLP);
 - ❖ Requests that land directly to the north of Abbey Farm Commercial Park (Approx. 0.9 hectares) is included as a modest but important extension to the Commercial Park for employment use B1, B2 and B8);
 - ❖ Objects to the proposed settlement boundary for Horsham St Faith and requests that it is extended and amended to encompass the western allocation, including the site extension to the north, which has been constructed and is occupied, but which is not presently included on the draft settlement maps;
 - ❖ Objects to draft Policy 6 ‘The Economy’ as currently worded and requests changes to the policy to allow for the potential expansion of existing small and medium employment sites across the GNLP area; and
 - ❖ Objects to draft Policy 7.4 ‘Village Clusters’ as worded and requests that it includes the existing employment allocation (site reference HNF3), land west of Abbey Farm Commercial Park as an allocated employment site. It is also requested that the policy supporting text is amended to allow for the expansion of existing small and medium employment sites within and adjoining village clusters.

2. Background to Abbey Farm Commercial Park

- 2.1 Abbey Farm Commercial Park is located approximately halfway along the western edge of the village of Horsham St Faith, towards the southern end of Broadland District. Horsham St Faith is essentially a linear settlement approximately 3 km (2 miles) north of Norwich City Airport and separated by a band of countryside to the south.
- 2.2 The site is accessed via Church Street, which directly links to the A140 main north-south route to the west and the recently constructed NDR. The existing Commercial Park covers an area of approximately 5 hectares (12.35 acres) and contains a grouping of twelve buildings mainly used for general and light industrial, as well as general offices and warehousing (falling within Classes B1, B2 and B8). The estate extends to a further 13.82 hectares (34.16 acres) of land principally to the north and west, comprising agricultural land contained by hedgerows.
- 2.3 The western part of the estate was allocated within the Broadland Site Allocations Development Plan Document in 2016 and allocated 2.9 hectares for employment use (B1, B2 and B8).
- 2.4 The site was established as a Commercial Park in the 1980's when three large horticultural buildings and a barn were converted for general employment uses. The Commercial Park has since grown into a significant employment area, being served by metalled estate roads, drainage, bunding and other ancillary infrastructure set within landscaped grounds. The degree of planting around the site boundaries which include several groups of mature and semi mature specimen trees, combine to provide an attractive and established setting for the Commercial Park and adjacent village particularly when viewed and approached from the Church Street frontage.
- 2.5 Abutting the Commercial Park to the east is the site of a former Benedictine Priory which contains a Scheduled Ancient Monument and Grade I listed building (a house which forms a remaining part of the medieval Priory). These heritage assets are set within heavily wooded grounds and are largely screened from public and private views. The parish church of St Mary's and St Andrew's is situated to the east of the Commercial Park, to the south of the Priory and fronts onto Church Street being prominent from the public highway to the south. These heritage assets, including a landscaped area in the south east corner of the Commercial Park lie within Horsham St Faith's designated Conservation Area.
- 2.6 The Commercial Park is owned by Horsham Properties Ltd and the majority of its buildings are leased to businesses which provide for a significant number of locally based jobs.
- 2.7 Notwithstanding the predominantly rural location, the Commercial Park is well located in relation to the local road network linking to Norwich to the south and the wider District of Broadland to the north.
- 2.8 In short, the Commercial Park is a highly successful development which provides for significant locally based employment and makes an important positive contribution to the local economy. It also contains potential infrastructure capacity to accommodate further development.

3. Greater Norwich Local Plan Part 1: The Strategy

Draft Policy 6 ‘The Economy’

- 3.1 The draft GNLP states that it seeks to support small and medium sized businesses within both urban and rural areas by allocating sufficient employment land and allowing for windfall sites to come forward. However, Policy 6 ‘The Economy’, as drafted does not provide a flexible policy basis to accommodate the needs not anticipated by the Local Plan or to enable the expansion of existing small and medium size employment sites across of the GNLP area. Policy 6, as drafted therefore does not align with the NPPF or adopted Joint Core Strategy Policy 5 ‘The Economy’ and it is requested that the policy is amended to allow for the expansion of existing small and medium sized employment sites, such as the Abbey Farm Commercial Park site.
- 3.2 Paragraph 116 of the GNLP explains that the role of smaller scale employment sites in the urban area, market towns and villages will help to deliver good access to jobs for all. To promote the delivery of jobs, Section 4 of the GNLP explains that the draft plan provides choice and flexibility by providing for a wide range of type and size of employment sites. In terms of smaller scale and rural employment sites, Section 4 explains that such sites will be supported in accessible and sustainable locations.
- 3.3 Policy 1 outlines the Local Plans sustainable growth strategy and the supporting text to this policy explains at paragraph 151 that the plan allocates employment sites totalling around 360 hectares. Paragraph 155 explains that the Plan also allocates land and allows for additional windfall delivery of smaller scale sites to provide for jobs growth elsewhere in the urban area, towns and villages, providing local job opportunities and supporting small-scale businesses and a vibrant rural economy.
- 3.4 Whilst Policy 6 as drafted recognises the needs of small, medium and start-up businesses and explains that this will be addressed through the allocation and retention of smaller scale employment sites across the area, the policy as drafted does not allow for the expansion of existing small and medium sized sites.
- 3.5 Policy 5 ‘The Economy’ of the Joint Core Strategy specifically addressed the needs of small and medium sized businesses within the policy by allowing for the expansion of existing small and medium sized employment sites. We consider that this part of Policy 5 should be carried forward into draft Policy 6 of the GNLP.
- 3.6 By allowing existing employment sites to expand, this would enable existing businesses to grow and meet their evolving requirements on site rather than relocate, potentially out of the GNLP area. Paragraph 80 of the NPPF states planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Paragraph 81 goes on to state that policies should be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances.
- 3.7 With the above national policy context in mind, we consider draft Policy 6 is not flexible enough to meet the changing requirements of businesses and request that paragraph 2 is amended to allow for the expansion of small and medium sized sites, such as Abbey Farm Commercial Park. We therefore request that Policy 6, Paragraph 2 is amended as follows:

2. The needs of small, medium and start-up businesses are addressed through:

- *the allocation and retention of smaller scale employment sites across the area **and the potential expansion of, a range of existing small and medium sized sites (LPP suggested text)**;*
- *encouraging the provision of small-scale business opportunities in all significant residential and commercial developments and through the appropriate use of rural buildings;*
- *Encouraging flexible building design and innovative approaches in new and existing residential developments to encourage local working and business opportunities.*

Draft Policy 7.4 ‘Village Clusters’

- 3.8 Horsham and Newton St Faith are identified as village cluster 17 with the GNLP consultation. Policy 7.4 ‘Village Clusters’ includes a table that sets out allocated employment areas within all the village clusters. The existing employment allocation (site reference HNF3) land West of Abbey Farm Commercial Park is not included within this table. Given that the site is allocated, and is proposed to be carried forward as an employment allocation in the GNLP, and the site owners intend to submit a planning application this Spring for its development for employment use, we request that the site is included in the Table.
- 3.9 As well as identifying specific allocated employment sites, Policy 7.4 states “other small-scale employment development will be acceptable in principle elsewhere within village development boundaries or through the re-use of rural buildings”.
- 3.10 We consider that the policy as drafted is not flexible enough to meet the changing requirements of businesses or facilitate development not anticipated by the Local Plan within rural areas. We therefore request that the policy is amended to allow for the expansion of small and medium sized employment sites. This change would align with national policy within the NPPF that requires policies to be flexible enough to enable businesses to expand and adapt.
- 3.11 With the above national policy context in mind, we consider draft Policy 7.4 is not flexible enough to meet the changing requirements of businesses and request that the penultimate paragraph of Policy 7.4 is amended to allow for the expansion of small and medium sized sites, such as Abbey Farm Commercial Park. We therefore request that the penultimate paragraph of Policy 7.4 is amended as follows:
- *Other small-scale employment development will be acceptable in principle elsewhere within village development boundaries or through the re-use of rural buildings **or through the potential expansion of existing small and medium sized employment sites (LPP suggested text)** subject to meeting other policies in the development plan.*

4. Response to Questions 6, 10, 15, 34 and 46 Raised in the GNLP Consultation Document

4.1 The following paragraphs set out the site owners' response to Questions 6, 10, 15, 34 and 46 set out in the draft GNLP consultation document.

Question 6 - Do you support or object to the vision and objectives for Greater Norwich?

4.2 The site owners support the vision and objectives for the Greater Norwich Area with regards to the economy as they recognise the role that smaller scale employment sites have in helping to deliver good access to jobs for all. However, the role that smaller scale employment sites across the area will play in delivering jobs should be recognised within Policy 6 'The Economy', and a flexible policy approach should be adopted that allows for the appropriate expansion of existing small and medium size employment sites to meet needs not anticipated by the Local Plan and businesses changing requirements.

4.3 With the above national policy context in mind, we consider draft Policy 6 is not flexible enough to meet the changing requirements of businesses and request that paragraph 2 is amended to allow for the expansion of small and medium sized sites, such as Abbey Farm Commercial Park. We therefore request that Policy 6, Paragraph 2 is amended as follows:

2. The needs of small, medium and start-up businesses are addressed through:

- *the allocation and retention of smaller scale employment sites across the area **and the potential expansion of, a range of existing small and medium sized sites (LPP suggested text):***
- *encouraging the provision of small-scale business opportunities in all significant residential and commercial developments and through the appropriate use of rural buildings;*
- *Encouraging flexible building design and innovative approaches in new and existing residential developments to encourage local working and business opportunities.*

Question 10 - Do you support, object, or have any comments relating to the approach to Economic Development set out in the Delivery Statement?

4.4 The site owners do not support the approach to economic development with regards to existing small and medium sized employment sites. Section 3 sets out the reasons why Policy 6 'The Economy' requires amending because as drafted, it does not align with the vision and objectives of the GNLP or the NPPF - Section 6 'Building a Strong and Competitive Economy'. It is therefore requested that Policy 6 is amended to allow for the expansion of small and medium sized employment sites.

4.5 With the above national policy context in mind, we consider draft Policy 6 is not flexible enough to meet the changing requirements of businesses and request that paragraph 2 is amended to allow for the expansion of small and medium sized sites, such as Abbey Farm Commercial Park. We therefore request that Policy 6, Paragraph 2 is amended as follows:

2. The needs of small, medium and start-up businesses are addressed through:

- *the allocation and retention of smaller scale employment sites across the area **and the potential expansion of, a range of existing small and medium sized sites (LPP suggested text):***
- *encouraging the provision of small-scale business opportunities in all significant residential and commercial developments and through the appropriate use of rural buildings;*
- *Encouraging flexible building design and innovative approaches in new and existing residential developments to encourage local working and business opportunities.*

Question 15 - Do you support, object or wish to comment on the approach for the Economy?

- 4.6 As explained above, the site owners do not support the Plan's approach to the economy with regards to existing small and medium size employment sites. Section 3 sets out the reasons why Policy 6 'The Economy' requires amending. It is therefore, requested that Policy 6 is amended to allow for the expansion of small and medium sized employment sites.
- 4.7 With the above national policy context in mind, we consider draft Policy 6 is not flexible enough to meet the changing requirements of businesses and request that paragraph 2 is amended to allow for the expansion of small and medium sized sites, such as Abbey Farm Commercial Park. We therefore request that Policy 6, Paragraph 2 is amended as follows:

2.The needs of small, medium and start-up businesses are addressed through:

- *the allocation and retention of smaller scale employment sites across the area **and the potential expansion of, a range of existing small and medium sized sites (LPP suggested text):***
- *encouraging the provision of small-scale business opportunities in all significant residential and commercial developments and through the appropriate use of rural buildings;*
- *Encouraging flexible building design and innovative approaches in new and existing residential developments to encourage local working and business opportunities.*

Question 34 - Do you support, object or have any comments relating to the approach to employment land?

- 4.8 As explained above, the site owners do not support the approach to employment land with regards to existing small and medium size employment sites. Section 3 sets out the reasons why Policy 6 'The Economy' requires amending. It is therefore, requested that Policy 6 is amended to allow for the expansion of small and medium sized employment sites.
- 4.9 With the above national policy context in mind, we consider draft Policy 6 is not flexible enough to meet the changing requirements of businesses and request that paragraph 2 is amended to allow for the expansion of small and medium sized sites, such as Abbey Farm Commercial Park. We therefore request that Policy 6, Paragraph 2 is amended as follows:

2.The needs of small, medium and start-up businesses are addressed through:

- *the allocation and retention of smaller scale employment sites across the area **and the potential expansion of, a range of existing small and medium sized sites (LPP suggested text):***

- *encouraging the provision of small-scale business opportunities in all significant residential and commercial developments and through the appropriate use of rural buildings;*
- *Encouraging flexible building design and innovative approaches in new and existing residential developments to encourage local working and business opportunities.*

Question 46 - Do you support or object or wish to comment on the approach for specific Village Clusters?

4.10 The site owners do not support the approach to Village Clusters as drafted within Policy 7.4 for the reasons set out in Section 3. It is requested that the policy is amended to include the existing employment allocation (site reference HNF3) land West of Abbey Farm Commercial Park within the policy. It is also requested that the text is amended to allow for the expansion of small and medium sized employment sites. We therefore request that the penultimate paragraph of Policy 7.4 is amended as follows:

- *Other small-scale employment development will be acceptable in principle elsewhere within village development boundaries or through the re-use of rural buildings **or through the potential expansion of existing small and medium sized employment sites (LPP suggested text)** subject to meeting other policies in the development plan.*

5. Greater Norwich Local Plan Part 2: Site Allocations

Employment Allocation HNF3 - Land at Abbey Farm Commercial Park, Horsham St Faith

- 5.1 Broadland District Council's Site Allocations Development Plan Document was adopted in May 2016 and allocates sites that are suitable for certain forms of development such as housing, employment, community facilities etc. The document allocates land at Abbey Farm Commercial Park (Approx. 2.9ha) for employment uses (Use Classes B1, B2 and B8). The draft GNLP proposes to carry forward this employment land allocation.
- 5.2 The employment allocation contains significant planning merits and represents sustainable development when considered against key planning policies set out in the National Planning Policy Framework (NPPF) document.
- 5.3 The site owners support the incorporation of the existing employment allocation within the GNLP. The site's allocation represents a sustainable extension of an existing local employment centre that would provide further expansion opportunities for existing businesses as well as for the introduction of new small and medium size businesses onto the site.
- 5.4 It is requested that the existing central bund is included within the employment allocation HNF3.

Horsham and Newton St Faith Site Proposals Map

- 5.5 A revised Site Proposal map for Horsham & Newton St Faith forms part of the draft GNLP, and these show the existing settlement boundary (purple dashed line) around the majority of Abbey Farm Commercial Park and the carried forward employment area to the west of the Commercial Park (blue line/dotted).
- 5.6 In March 2018, LPP wrote in response to the GNLP Regulation 18 Site Proposals Consultation Document and again in December 2018 in response to the GNLP Site Proposals Addendum (New, Revised & Small Sites) Consultation. Within both responses it was requested that the settlement boundary be extended around the allocated part of the business park as well as the existing industrial land and our justification for this is set out below.
- 5.7 In 2012 permission was granted (reference 20121385) for an extension of the business park in the north. These buildings have been built and are occupied and form a set of industrial units known as 'L-block'. The draft purple settlement boundary line does not extend around this area, and therefore we request that this is amended to reflect the current limits of the existing operational business park.
- 5.8 The site owners maintain their stated intention to develop the allocated land to the west within the next five years and are in the process of preparing a planning application which is due to be submitted during spring 2020. The draft Site Proposals map for Horsham and Newton St Faith excludes the allocated employment site to the west and therefore we request that this is amended to encompass the allocated site.

- 5.9 The allocated employment land to the west of the Commercial Park formed part of the site granted planning permission in 2012. This land contains development by way of engineering operations, bunds and structural landscaping which were designed to reduce the visual impact of the business park extension (L Block) in the north-east – these elements being integral to the delivery of this development.
- 5.10 The extent of development approved in 2012 is shown on drawings numbered 001D (Site Plan) and 051 B (Block Plan) ([Appendices 1 & 2](#) to this letter). The area where the settlement boundary is requested to be extended, is shown in yellow lining on an extract of the Horsham & Newton St Faith GNLP draft Site Proposals map ([Appendix 3](#)).
- 5.11 Given the dependency between the allocated land in the west and the recent development of L-Block, it is considered that the inclusion of this land within the settlement limits of Horsham and Newton St Faith is appropriate and justified.
- 5.12 It is noted that the GNLP Settlement Summary suggests settlement boundaries will only be extended where development already exists on a site. Due to the presence of engineering operations and landscaping, required in connection with an implemented planning permission, which extended the commercial park to the north, the allocated land essentially forms and functions as a physical extension to the existing settlement. Thus, the settlement limits should be extended to enclose the entire Commercial Park and intended consolidation.
- 5.13 However, notwithstanding the GNLP's position on land to the west, it is requested that, as a minimum, the settlement boundaries are amended to include L-block and its operational land in the north. The land and buildings have been built but are not presently included in the settlement limits of the village as shown on the Site Proposals map. Given that this building, and associated land around it presently function as part of the operational business park, they should clearly be included within the settlement limits extension.

6. Allocation of Land North of Abbey Farm Commercial Park

- 6.1 It is requested that a proposed 0.9 hectare northern extension to the Commercial Park for employment use (B1, B2 and B8) is allocated in the new GNLP. The proposals envisage the provision of a single building to the north of Block L supported by structural landscaping. The further building would provide additional capacity for the Commercial Park in addition to the western employment land allocation to enable a modest expansion to the north during the Plan period.
- 6.2 A Sustainability Assessment of the site has been undertaken and included at [Appendix 4](#) using the methodology applied by the Council within the Housing and Economic Land Availability Assessment (2020) and identifies the site's suitability, availability and achievability for employment use. A site plan with the area of land identified in red is included at [Appendix 3](#).
- 6.3 The commercial building envisaged would be similar in scale to the recently constructed Block L and would provide an overall additional floorspace in the region of 1800m². The proposed building will relate to and reflect the general profile and scale of the existing buildings but with a more contemporary appearance and responding to the rural setting in line with the recently constructed Block L.
- 6.4 The proposed single block would be served by either the existing main vehicular access into the Commercial Park from Church Road, or by the proposed vehicular access from Church Road proposed as part of the western extension. The building would be served off the existing estate road that runs to the north of Block L and forms a logical completion of the Commercial Park to the north.
- 6.5 The proposed site layout prioritises access to the site by foot, cycle and public transport and seeks to encourage sustainable transport and equality of access. Pedestrian access to the proposed building would be via the existing footway between blocks A and B which brings pedestrians to the main entrance. A public footway is proposed on the northern side of Church Road as part of the western extension allocation and this would extend across the frontage of the existing Commercial Park and provide safe pedestrian access into the village and to the nearest bus stop.
- 6.6 Suitable provision would be made for secure bicycle parking facilities and would be located in a convenient location.
- 6.7 Additional landscaping would also mitigate the visual effects of the proposed development on the setting of the settlement and the proposal would not be visible from the heritage assets to the south east due to the existing landscaped bund.
- 6.8 In 2018/2019, ecological surveys were undertaken of the land north of Block L and the report concluded that this area is of low ecological value with no statutory protected species located within 2km of the site. The report states that no significant ecological constraints were identified that would adversely affect the proposed development at the site, subject to the mitigation measures suggested within the report being undertaken. The report concludes that with the recommended mitigation and suggested enhancements incorporated into the layout, there is an opportunity to enhance the value of the site for local wildlife, resulting in a net gain for biodiversity, as is encouraged by the National Planning Policy Framework.
- 6.9 In flood risk terms, the site is located within Flood Zone 1, where the risk of tidal or fluvial flooding is considered as low. The site has no recorded history of presence of contamination.

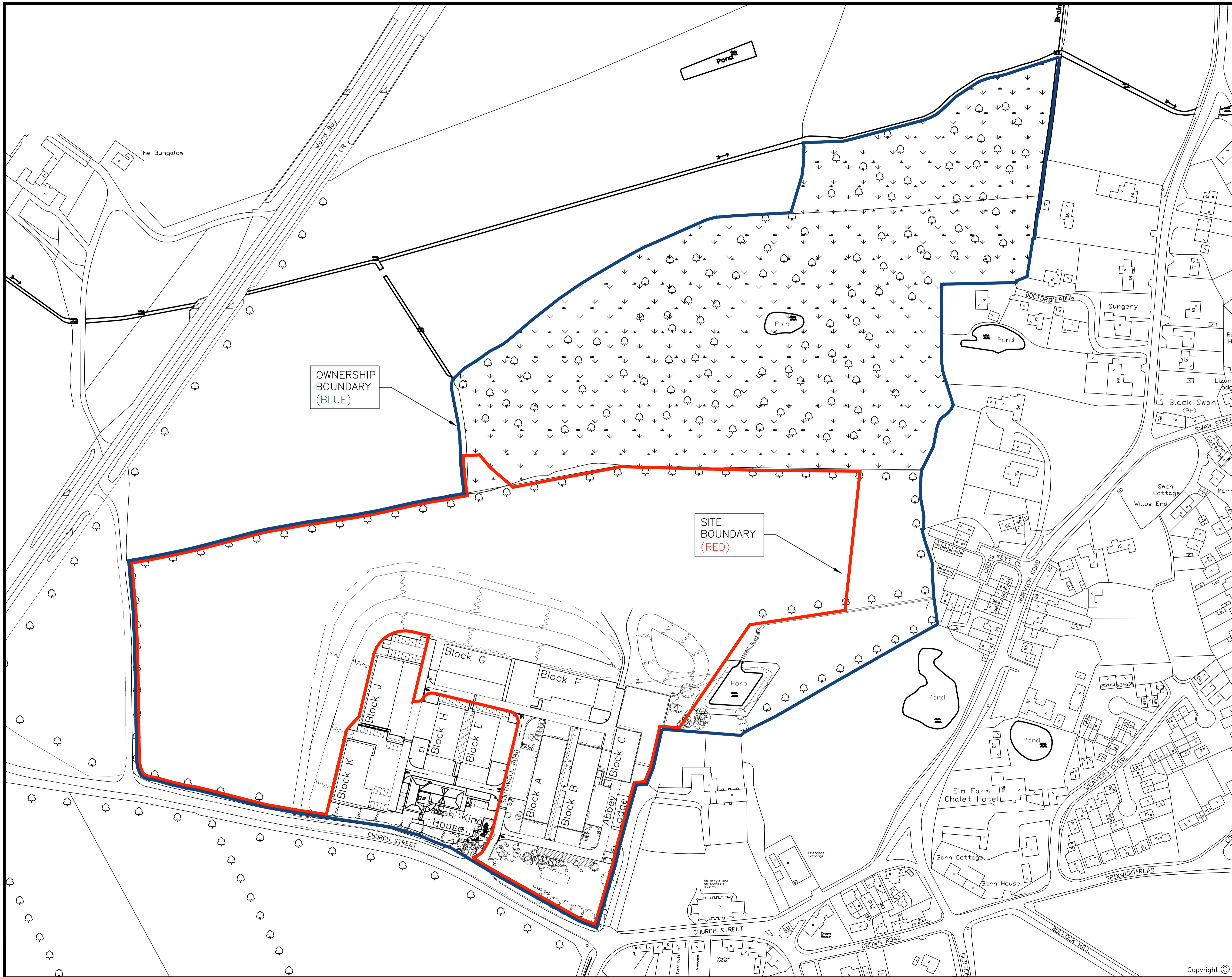
- 6.10 The nearest residential property, 'The Priory' is located to the south east of the site and it is considered that, because of the nature of the development and the separation distances involved there would be no material harm due to noise disturbance. Furthermore, in view of the level of physical separation between The Priory and the proposed site, together with the reinforced planting proposed adjacent to the boundary between the two, there would be no material resultant planning harm by reason of loss of outlook, daylight or privacy to this dwelling or any other residential property.
- 6.11 In summary, the small but important allocation of 0.9 hectares of land to the north of the Commercial Park would contribute towards business, general industrial and warehousing accommodation within Broadland and would create economic benefits for the area, including the creation of jobs. The land's allocation would result in the provision on one additional building to the north of the Commercial Park, together with structural landscaping and forms a logical final extension to the north.

7. Summary and Conclusion

- 7.1 The site owners support the incorporation of the existing employment allocation (site reference HNF3), land west of Abbey Farm Commercial Park within the Greater Norwich Local Plan (GNLP). The site's continued allocation for employment purposes represents a deliverable and sustainable form of development which is compliant with the NPPF and would make a meaningful contribution towards the employment land supply for the GNLP area with the timing of the associated development to likely be within the first five years of the Local Plan period.
- 7.2 It is therefore, considered that the planning merits of the carried forward site allocation for employment use should be recognised and the site re-allocated for employment use in the new GNLP. It is however requested that the existing central bund is included within employment allocation HNF3.
- 7.3 It is considered that the allocation of further land (approx. 0.9 hectares) to the north of the Commercial Park for employment use would also be compliant with the NPPF and the spatial approach for employment land set out in the GNLP. It is envisaged that the site's allocation would provide one additional building to the north of the Commercial Park, together with structural landscaping and forms a logical final extension to the Commercial Park. This additional allocation of land would provide for a small but important extension to the Commercial Park, which could be achieved within the limits of the site's future infrastructure capacity during the Plan period to 2040.
- 7.4 The draft Proposals Map settlement boundary for Horsham and Newton St Faith does not encompass the western allocation, or the site extension to the north that was constructed and occupied in 2019. It is requested that the proposed settlement boundary is amended to encompass these areas.
- 7.5 The site owners object to draft policies 6 'The Economy' and 7.4 'Village Clusters' as both policies do not allow for the potential expansion of small and medium sized employment sites across the GNLP area. Both policies are not flexible enough to meet the changing requirements of businesses or facilitate development not anticipated by the Local Plan. It is requested that both policies are amended to include for the expansion of small and medium sized businesses. This change would align both policies with national guidance within the NPPF that requires policies to be flexible enough to enable businesses to expand and adapt.
- 7.6 It is also requested that Policy 7.4 'Village Clusters' is amended to include the Abbey Farm Commercial Park as an employment site.

Appendix 1

Site Plan 001D – Detailing extent of development approved by 2012 permission (20211385)



OWNERSHIP
BOUNDARY
(BLUE)

SITE
BOUNDARY
(RED)

NOTES

D	UPDATED TO SUIT COMMENTS RECEIVED	ME 18/07/12
C	SITE BOUNDARY AMENDED	ME 17/07/12
B	SITE BOUNDARY INDICATED IN RED	ME 09/07/12
A	FIRST ISSUE	DIV 16/12/11
ISSUE LETTER	ISSUE	INITIAL & DATE

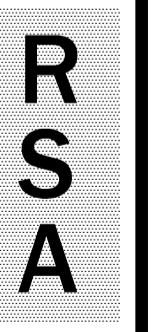
CLIENT

Horsham Properties Limited

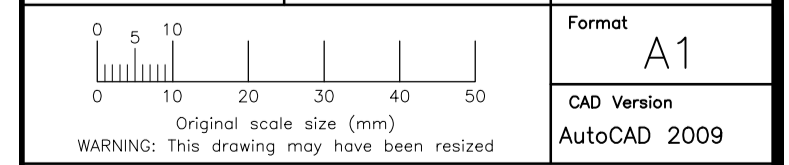
PROJECT TITLE
**ABBEY FARM COMMERCIAL PARK
NORSHAM ST. FAITH
NORWICH**

DRAWING TITLE
**EXISTING SITE AND LAND
OWNERSHIP PLAN**

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Drawn by	Date	Scale
DIV	16/12/11	1:1250 at A1 1:2500 at A3
Checked by	Date	



Drawing Status
P--PRELIMINARY, I--INFORMATION, A--APPROVAL, T--TENDER, C--CONSTRUCTION, R--RECORD

Drawing No	Issue	Status
N11126	/001 /	D P

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Appendix 2

Block Plan 051B – Detailing extent of development approved by 2012 permission (20211385)

Appendix 3

Annotated Extract of Horsham & Newton St Faith Site Proposals Map

HORSHAM & NEWTON ST FAITH

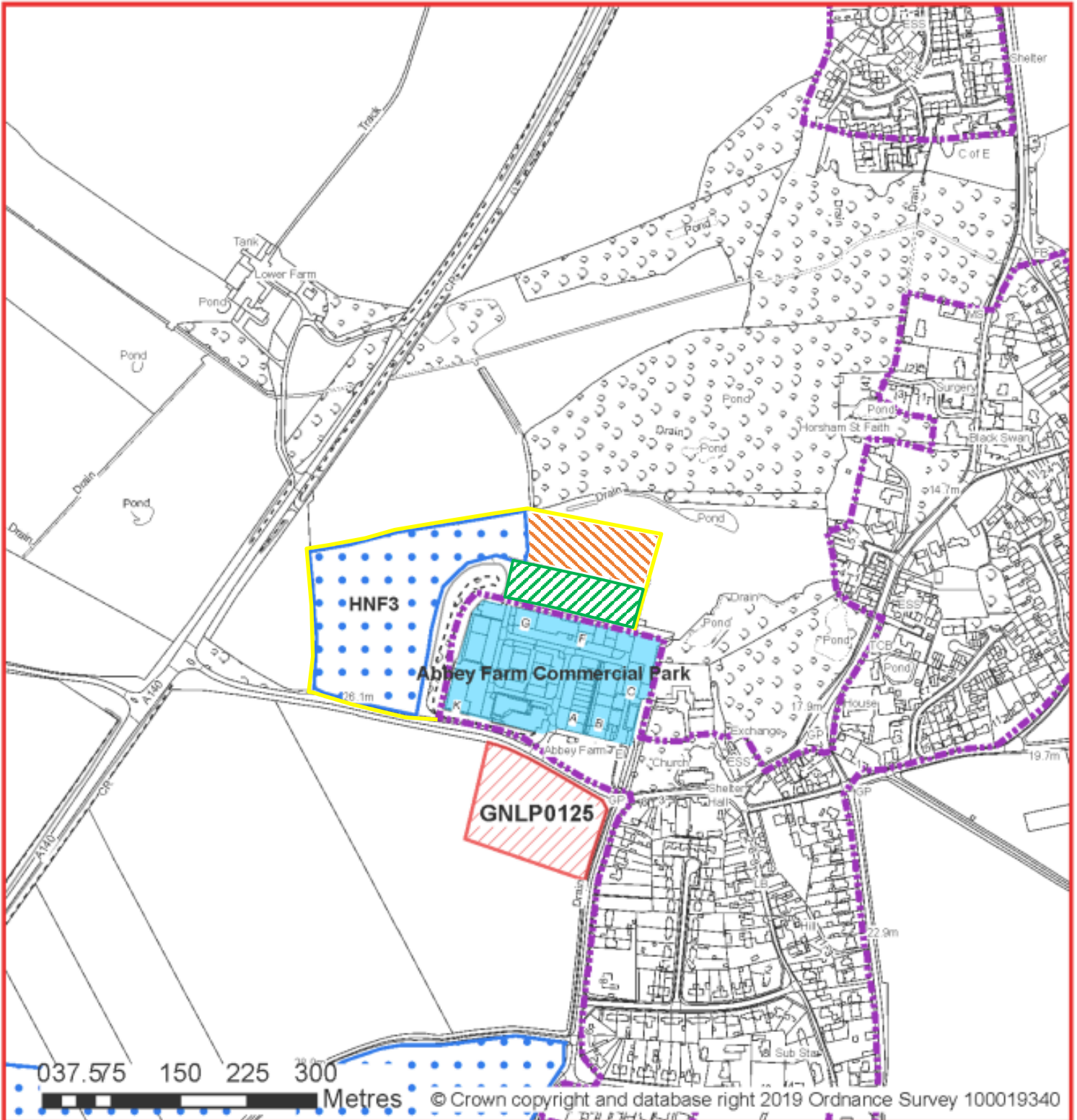
Greater Norwich Local Plan
Carried Forward Allocation








Site Reference HNF3
Location Land at Abbey Farm Commercial Employment
Allocation uses in Class B1, B3 & B8
Area 2.9 ha

(Also shown as commitments
on other maps)



Date: 30/10/2019



- | | | | |
|--|---------------------------------------|---|---|
|  | Existing Settlement Boundary |  | Extent of Settlement boundary requested by LPP |
|  | Carried forward Employment Allocation |  | Additional area LPP request is included in the settlement boundary due to the presence of L Block |
|  | Preferred Housing Allocation |  | Additional area of land LPP request is included as an Employment Land Allocation |
|  | Strategic Employment Site | | |

Appendix 4

Land North of Abbey Farm Commercial Park – Sustainability Assessment

Sustainability Appraisal – Abbey Farm Commercial Park, Horsham St Faith

Objective	Score	Site Sustainability Conclusions
Constraints		
Access	Green	<p>The proposed site would be served by either the existing main vehicular access into the Commercial Park from Church Road, or by the proposed vehicular access from Church Road proposed as part of the western extension. The building would be served off the existing estate road that runs to the north of Block L and forms a logical completion of the Commercial Park to the north.</p> <p>While the proposal will inevitably result in a slight increase in overall vehicular movements associated with the site, this will not be to the extent that the existing or proposed access point is not suitable or sufficient.</p> <p>Access to the site by foot, cycle and public transport would be possible. Pedestrian access to the site would be via the existing footway between blocks A and B which brings pedestrians to the main entrance. A public footway is proposed on the northern side of Church Road as part of the western extension allocation and this would extend across the frontage of the existing Commercial Park and provide safe pedestrian access into the village and to the nearest bus stop.</p> <p>Suitable provision would be made for secure bicycle parking facilities and would be located in a convenient location.</p>
Accessibility to Services	Green	While the site is in a relatively rural location, it does have good access to a range of facilities. There are bus stops located

		<p>approximately 250m to the south-east with services running to Norwich City Centre at peak times (7.27am, 4.05pm, 4.24pm and 4.59pm), with the Church of St Mary and St Andrew adjacent to the east. There is a primary school approximately 700m to the north-east, and a public house within 500m to the north-east. There is also a Post Office located 350m to the south-east, while Abbey Farm Commercial Park itself includes a range of employment opportunities; this proposal will add to this existing provision.</p> <p>Therefore, four core services have been identified and successfully demonstrate the site has good accessibility to local services and facilities.</p>
Utilities Capacity	Green	The existing site includes utility services including gas, electricity and water supply; the proposal is an extension to the existing site and can therefore connect with these. Further, waste management efficiency can also be achieved by connecting with the existing well managed and serviced commercial park. Therefore, full provision of utilities can be provided, thereby meeting this criterion.
Utilities Infrastructure	Green	The site is largely laid to grass, with no under or over ground utilities infrastructure such as power lines, gas pipelines, water pipelines, sewers or power stations passing across it. The proposal therefore meets this criterion.
Contamination and Ground Stability	Green	The site is open grass land that has not previously been developed upon, and is therefore not known to be contaminated or have any ground stability issues.
Flood Risk	Green	The site falls within Flood Zone 1 and SUDS features can be used to minimise the risk of flooding to the site and adjacent land and property.
Market Attractiveness	Green	The site is an extension to an existing successful commercial park that has operated since the 1980's and contains 12 units

		of a mixture of B1, B2 and B8 uses. It is therefore concluded the site is located in a marketable area.
Impacts		
Significant Landscapes	Green	The site is not located within or adjacent to National Parks, the Broads or Areas of Outstanding Natural Beauty, and while there are a number of treed areas on or adjacent to the site it is not anticipated that there are any trees protected by a Tree Preservation Order. Although the site is located on the edge of Horsham St Faith, there is a large existing commercial park sitting adjacent, so the site is not considered to be particularly sensitive. The works would therefore result in a neutral impact on any sensitive landscapes.
Sensitive Townscapes	Green	<p>The site is not located in an area within or adjacent to National Parks, the Broads or Areas of Outstanding Natural Beauty. The proposal would also not result in the loss of protected trees.</p> <p>The Horsham St Faith Conservation Area is located to the south-east of the site, as is a Grade I Listed Building/Scheduled Monument. However, while it is acknowledged that these form a key part of the local townscape value, there is an existing commercial park in situ that will largely restrict any views of the proposal. Given this, and that key views of both the listed buildings and conservation area will be unaffected, the proposal is considered to preserve the setting of both the listed building/scheduled monument and the Horsham St Faith Conservation Area.</p>
Biodiversity and Geodiversity	Green	The proposal will not impact on designated sites or upon protected species. In 2018/2019, ecological surveys were undertaken on the site, where the report concluded the area is of low ecological value with no statutory protected species located within 2km of the site. Further, no significant ecological

		constraints were identified that would adversely affect the proposal, subject to mitigation measures. The report concludes that with recommended mitigation measures and enhancements, there is an opportunity to enhance the value of the site for local wildlife, resulting in a net gain for biodiversity.
Historic Environment	Green	<p>There is a Grade I Listed Building and Scheduled Monument adjacent to the east of the proposal site, as well as the Horsham St Faith Conservation Area. The sites historic importance is therefore clear. In light of this, any future design would be of a sensitive nature and in-keeping with the existing commercial park.</p> <p>Given the above, and that key existing views of the conservation area, listed building and scheduled monument will be unobstructed, there is considered to be a neutral impact to the setting of these designated heritage assets.</p>
Open Space and Green Infrastructure	Green	The site is largely laid to grass but has low public value given that views to it are largely restricted and that it falls adjacent to the A140. The proposal therefore does not result in the loss of any open space.
Transport and Roads	Green	It is inevitable that the proposed employment related development will result in some increase in vehicular movements. However, the proposal is an extension of an existing commercial park and would therefore not result in a dramatic increase to existing levels. There is a sufficient access in situ, while there is good accessibility to public transport (with bus stops located 250m from the site), housing and additional facilities including a primary school, post office and public house. It is therefore concluded that the proposal will not have a detrimental impact on the functioning of the existing road network.

<p>Compatibility with Neighbouring Uses</p>	<p>Green</p>	<p>The proposal is an extension to a commercial park that has been in situ for a number of years. The proposal is therefore entirely compatible with the neighbouring use.</p> <p>While there is a residential property to the east, the proposal will be sited sufficient distance apart (approximately 150m) to ensure no harm to their amenities.</p>
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