

FCC ENVIRONMENT REPRESENTATIONS  
GREATER NORWICH LOCAL PLAN EXAMINATION  
WRITTEN STATEMENT  
MATTER 2: VISION, OBJECTIVES AND SPATIAL STRATEGY



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**REPORT NUMBER**

WR7376/66

**REPORT STATUS**

FINAL

**REVISION**

0

**REPORT DATE**

January 2022

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# 1. INTRODUCTION

## 1.1 INTRODUCTION

- 1.1.1 Sirius Planning have been instructed on behalf of FCC Environment Ltd (herein referred to as 'FCC') to make representations in response to Matter 2 of the Greater Norwich Local Plan (GNLP) Examination.
- 1.1.2 This hearing statement follows on from FCC's previous representations to the Growth Options Consultation in 2018, the Regulation 18 Consultation in 2020 and the Regulation 19 Consultation in 2021.
- 1.1.3 FCC are submitting this hearing statement in respect of their landholding at Pulham Market (ref. GNLP2128) which is being promoted for a small-scale employment / commercial development.
- 1.1.4 FCC's Pulham Market site provides the perfect opportunity to re-develop a strategically located sustainable brownfield site for use that will generate economic benefits for the local area in accordance with the NPPF. The proposal would provide local employment opportunities and serve local needs by providing an enhanced services / retail offer to the surrounding local rural communities.

### Background

- 1.1.5 FCC's Pulham Market site covers an overall area of c.1.92ha located strategically to the west of Pulham Market village and to the south of Long Stratton. The site's eastern boundary borders the A140 and the site's northern boundary borders the B1134. The A140 / B1134 roundabout is located to the north-east of the site, connecting the site to the surrounding rural communities and providing excellent access. The site was a former waste transfer and recycling centre leaving underutilised previously developed and disturbed land available for sustainable development.

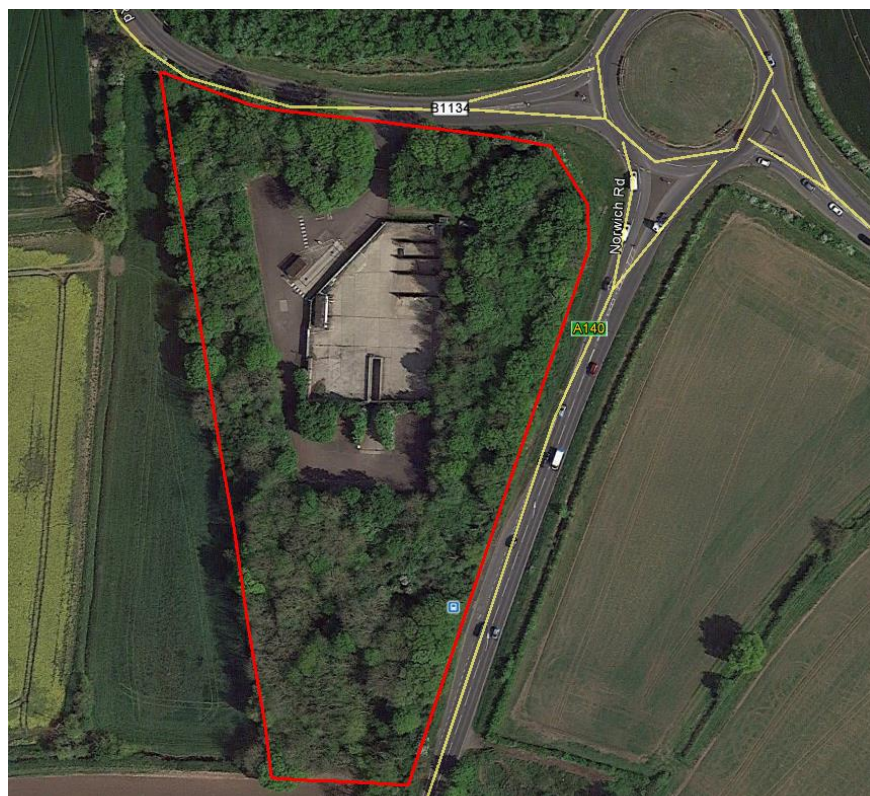


Figure 1: Pulham Market Site Location

- 1.1.6 Within the Housing and Economic Land Availability Assessment (HELAA) Addendum October 2018, the site was considered suitable and scored 'Green' for all constraints except contamination. However, site GNLP2128 has not been allocated within the GNLP Pre-Submission Draft.
- 1.1.7 The Greater Norwich Partnership's response to the site promotion during the various consultations was

that the site is better dealt with through the planning application process and there is no identified need to allocate any additional employment sites. However, the emerging policies set out in the Pre-Submission Document do not reference development outside settlement limits and are considered to be overly restrictive, placing unnecessary limits on the most effective use of land and potential delivery of sustainable rural economic growth. FCC consider the GNLP should be amended to reflect opportunities to boost the rural economy, the importance of which is highlighted within the Employment Land Assessment Addendum 2020.

- 1.1.8 Even though site GNLP2128 has not been allocated within the Pre-Submission Draft, FCC maintain that the redevelopment of the site is viable/achievable with sufficient market demand and would provide an opportunity to redevelop a redundant brownfield site. Should it become clear during the Examination that further employment land requires allocating, by way of this submission FCC are promoting their Pulham Market site as available and alternative site.

## 1.2 MATTER 2: VISION, OBJECTIVES AND THE SPATIAL STRATEGY

- 1.2.1 Having considered the Inspectors questions for discussion within the Hearing, this written statement provides FCC's responses to the following questions


- Matter 2: Vision, Objectives and the Spatial Strategy

Issue 1: Have the vision, objectives and growth strategy for Greater Norwich been positively prepared, are they justified and consistent with national policy and can they be realistically achieved? Does the Plan set out a clear spatial strategy? Has the spatial strategy and overall distribution of development been positively prepared, is it justified by a robust and credible evidence base and is it consistent with national policy?

- Q. 1. Does the Plan adequately set out a vision for Greater Norwich based upon the evidence?
- Q. 2. Are the plan's objectives soundly based and consistent with the vision and the evidence?
- Q. 6. Is it clear which policies in the Plan are strategic, and which are non-strategic?

Issue 3: Economy

- Q. 3). Do the key strategic employment locations set out in Policy 7.1 and Policy 6, together support the vision and objectives of the Plan?
- Q. 4). Are the key strategic employment locations consistent with the spatial distribution growth set out in the Plan?
- Q. 5). Is the hierarchy of centres as set out in Policy 6 justified by the evidence and consistent with the spatial strategy?



## **2. MATTER 2: VISION, OBJECTIVES AND SPATIAL STRATEGY**

**2.1 ISSUE 1: HAVE THE VISION, OBJECTIVES AND GROWTH STRATEGY FOR GREATER NORWICH BEEN POSITIVELY PREPARED, ARE THEY JUSTIFIED AND CONSISTENT WITH NATIONAL POLICY AND CAN THEY BE REALISTICALLY ACHIEVED? DOES THE PLAN SET OUT A CLEAR SPATIAL STRATEGY? HAS THE SPATIAL STRATEGY AND OVERALL DISTRIBUTION OF DEVELOPMENT BEEN POSITIVELY PREPARED, IS IT JUSTIFIED BY A ROBUST AND CREDIBLE EVIDENCE BASE AND IS IT CONSISTENT WITH NATIONAL POLICY?**

**Q1). Does the Plan adequately set out a vision for Greater Norwich based upon the evidence?**

- 2.1.1 FCC note that there is no reference in the vision, or policies, to the rural economy outside settlement boundaries and within the countryside. This is questioned and not considered justified given numerous evidence base documents highlight the importance of the rural economy including the Employment Land Assessment Addendum 2020 which identifies the rural economy as an opportunity to rebalance the local economy internally. This approach differs from the adopted South Norfolk Joint Core Strategy which supports small to medium scale commercial enterprises within the countryside where a rural location can be justified.
- 2.1.2 To be consistent with the NPPF, the Local Plan needs to consider the vitality and economy of rural areas needed for rural communities to boost rural economic growth. FCC consider that to exclude land from development purely because it lies outside of a settlement boundary would place unnecessary limits on the most effective use of land and potential delivery of sustainable development. FCC's further comments on the rural economy can be found in their response to Issue 3 below.
- 2.1.3 FCC consider that the Plan's vision should be strengthened to include the importance of the rural economy within the countryside.
- 2.1.4 Paragraph 148 of the vision states that "*development will make efficient use of brownfield sites and minimise the loss of greenfield land*". FCC consider that this statement should be strengthened to add that development will make efficient use of brownfield sites within both urban and rural areas. The NPPF encourages the effective use of land by reusing all brownfield land.

**Q2). Are the plan's objectives soundly based and consistent with the vision and the evidence?**

- 2.1.5 The Plan's objective for economy states that "*to support and promote clean growth and progress towards a post-carbon economy through the expansion of internationally important knowledge-based industries in the Cambridge Norwich Tech Corridor as part of a wider entrepreneurial, enterprising, creative and broad-based economy with high productivity and a skilled workforce*" (page 38).
- 2.1.6 As per above, neither the vision nor objectives for the Plan refer to the rural economy outside settlement boundaries. This is not considered to be consistent with the Employment Land Assessment Addendum 2020 which highlights the importance of the rural economy. FCC consider that the objective for economy should reference the importance of the rural economy and the support for the vitality of rural communities.

**Q6). Is it clear which policies in the Plan are strategic, and which are non-strategic?**

- 2.1.7 As currently drafted, it seems that the Plan only contains strategic policies. It is unclear to FCC why there are no non-strategic policies within the Plan.



## 2.2 ISSUE 3: ECONOMY

**Q3). Do the key strategic employment locations set out in Policy 7.1 and Policy 6, together support the vision and objectives of the Plan?**

**Q4). Are the key strategic employment locations consistent with the spatial distribution growth set out in the Plan?**

**Q5). Is the hierarchy of centres as set out in Policy 6 justified by the evidence and consistent with the spatial strategy?**

2.2.1 Questions 3, 4 and 5 of Issue 3 (Economy) all relate to key strategic employment locations and the economic spatial growth strategy and therefore have been answered together.

### Spatial Growth Strategy

2.2.2 As discussed above, FCC consider that the vision and objectives of the Plan should be strengthened to support the rural economy. The proposed key strategic employment locations within the GNLP are located within or surrounding urban areas. FCC consider that the approach is not appropriate given the rural districts within Greater Norwich. As currently drafted, the GNLP provides insufficient opportunities for economic development in rural areas.

2.2.3 The hierarchy of centres presented in Policy 6 includes village clusters which covers all other settlement areas outside the key service centres. FCC consider that the countryside should be identified on the settlement hierarchy enabling the growth of the rural economy.

2.2.4 FCC consider that to be consistent with the NPPF, the GNLP needs to go further in supporting development in the countryside where there is a justified locational need. Paragraph 83 of the NPPF states that *“planning policies and decisions should recognise and address the specific locational requirements of different sectors”*.

2.2.5 Paragraph 85 of the NPPF states that *“planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport”*. It is therefore considered that Policy 6 is not consistent with national policy due to this inherent conflict with paragraph 85 of the NPPF. As such, the GNLP is considered to be unsound in relation to the provision of employment generating uses in rural communities.

2.2.6 As stated in FCC’s Regulation 19 consultation representation submission, it is noted that a large proportion of the employment allocations have been brought forward from current adopted plans and that the GNLP does not make significant additional allocations beyond those already identified. FCC consider that all undeveloped allocated sites should be regularly reassessed to determine whether they are likely to be developed by the end of the GNLP period. If a site is no longer considered to be deliverable, it should be de-allocated and replaced by an alternative allocation. Policies also should remain flexible enough for any new sites to be considered acceptable over and above allocated sites. This is in line with paragraph 122 of the NPPF which states that *“planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability...”*.

2.2.7 Paragraph 188 of the Pre-Submission Draft Strategy states that the strategy for the location of growth is to maximise brownfield development and regeneration opportunities, which are mainly in Norwich. FCC considers that this should be strengthened to maximise brownfield land within rural areas too. The NPPF encourages the effective use of land by reusing all brownfield land.

### Rural Economy

2.2.8 FCC consider that the current GNLP does not propose an effective or justified strategy for the economy

of rural areas.

- 2.2.9 Policy 6 states that the needs of small, medium and start-up businesses are addressed through the allocation and retention of smaller scale employment sites across the area with limited expansion where this can be justified and the provision of small-scale business opportunities in all significant residential and commercial developments.
- 2.2.10 Policies 7.1 to 7.4 provides details of the distribution of growth and follow the settlement hierarchy. Policy 7.4 outlines the strategy for areas of growth within village clusters and highlights that there will be 2.3ha of new employment allocations within this settlement hierarchy tier. The policy states that *“other small-scale employment development will be acceptable in principle elsewhere within village development boundaries, through the re-use of rural buildings or through the potential expansion of existing small and medium sized employment sites, subject to meeting other policies in the development plan”*.
- 2.2.11 FCC consider this will restrict future economy development in rural areas. A less restrictive approach, whereby the merits of each case is considered individually, would support greater enhancement of the rural economy. The policy should include the benefits that the scheme would generate for the rural economy to be considered and weighed against any impacts.
- 2.2.12 For Policy 7.4 to be consistent with national policy, small-scale employment development should also be acceptable in principle within the countryside where a rural location outside settlement boundaries can be justified. For example, re-fueling stations and services have a functional need to be located off strategic roads usually outside settlement boundaries, such as FCC’s Pulham Market site proposals. Services including petrol filling stations are key infrastructure requirements for economic growth, especially in rural locations where communities are dependent on the private car. The GNLP should be worded in such a manner that further infrastructure requirements in rural areas can be provided for, enabling the rural economy to be boosted.
- 2.2.13 FCC consider that either Policy 6 and 7.4 needs to be amended to support rural economic development in the countryside where a functional locational need is justified or a new criteria-based policy allowing windfall developments in the countryside be included within the GNLP which will provide flexibility in relation to varying locational requirements. Given the Greater Norwich area is predominately rural in nature, in particular South Norfolk in which FCC’s Pulham Market landholding is situated, FCC consider that the GNLP should go further with its strategy to boost the rural economy. The Broadland and South Norfolk Our Plan 2020 – 2024 identifies growth of the economy as an objective including supporting all sizes and types of businesses. It is considered that the creation of employment generating uses in rural locations on a small scale would provide local people with local jobs, helping to reduce carbon emissions from commuting, whilst also reflecting the current trend of home working and new start-up businesses that have arisen over the last few years during the pandemic. Policies need to be flexible to enable change and worded in a positive manner to proactively encourage the rural economy.

