

**Greater Norwich Local Plan  
Hearing Statement  
Matter 7 – The Economy (Policy 6)**

## Introduction

This Hearing Statement has been produced by Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council as the Greater Norwich Development Partnership (GNDP).

The Document Library for the Greater Norwich Local Plan (GNLP) Examination and further information can be found on the GNLP Examination website:

[www.gnlp.org.uk](http://www.gnlp.org.uk)

The Councils have responded to each question directly in the body of the Hearing Statement.

## Issue 1: Is Policy 6 The Economy justified and effective?

### Question 1

How would the proposed definition of 'employment uses' work in practice given the introduction of Class E within the Use Classes Order?

### Response to question 1

1. Use Class E brings together but continues to differentiate a wide range of uses.
2. It is proposed to update the GNLP Glossary and the monitoring framework to define employment use as “*Use primarily for industrial, warehousing, office or other business uses falling within classes E(g), B2 and B8 of the use classes order*” (see the answer to the Inspectors’ initial question 32 on page 26 of [B1.4A](#))
3. Such an approach is consistent with the evidence supporting the plan which is predicated on these being the principal uses of employment land. The evidence specifically finds no need for large scale out of centre retailing, and the current uncertainties around town centres suggest particular caution ([B3.9](#)). Allowing the policy to be interpreted as including large scale retailing would be contrary to the NPPF’s requirement for a sequential approach and detrimental to the vitality and viability of town centres including the city centre. Consequently, it would not be justified or reasonable to include a definition of employment uses that allowed uncontrolled development of retail and other main town centre uses on employment sites.
4. It is standard practice to control developments to specific uses within the use class order to control their impact and character. Typically, this has been applied to out-of-centre retail uses within the old Class A1 to differentiate between the impacts of food, non-food and “bulky goods”. The different proportions of the previous B class uses may be specified for an employment proposal in order to control transport impacts and ensure appropriate infrastructure is provided. A further example is where employment development within the old Class B1 is limited to research and development uses in Class B1b.
5. In response to these issues, Paragraph 298 of the GNLP Strategy ([A1](#)) recognises the different impact of different uses and that “*it will be important to ensure through conditions that the development that takes place is consistent with the evidence provided with the planning application*”.
6. The definition does not place a blanket ban on other uses. Policy 6 states that *Land identified for employment uses in this local plan will only be considered for other uses that are ancillary to and supportive of its employment role*. Depending on scale and character and subject to evidence, most E Class uses, including small scale retailing, could be considered to be ancillary or supportive of the main employment function of allocated sites.

## Question 2

Is it justified for Policy 6 to seek to “avoid the loss of commercial premises” in centres? What definition of “commercial premises” is proposed? Is such an approach likely to be effective given the introduction of Class E and the availability of permitted development rights?

### Response to question 2 -

7. NPPF paragraph 86a requires Local Plans to promote the long-term vitality and viability of town centres “by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters”.
8. NPPF paragraph 86d requires plans to meet the needs of retail, leisure, office and other main town centre uses, while paragraph 86e requires a sequential approach to main town centre uses.
9. Clearly, housing is a suitable use in centres, but it is not subject to a sequential approach and is not a main town centre use.
10. Meeting the needs of main town centre uses, providing a suitable mix of uses, retaining the distinctive character and promoting the vitality and viability of centres would all be undermined by unrestrained residential development. While the current permitted development rights under Class MA allow for the change of use of most main town centre uses to residential, development is not permitted where the building has not been vacant for 3 months, where it is listed, or where the unit exceeds 1,500sqm. It also does not cover all uses that bring vitality and viability to a centre for example a number of F Class community and educational uses and *sui generis* leisure uses.
11. While some changes of use to residential can take place without the need for full planning consent, the policy will influence proposals that are outside the scope of PD rights to help to ensure that active uses are considered in redevelopments.
12. An Article 4 direction to manage changes of use from office to residential in the city centre has recently been confirmed to come into effect in July 2022 (subject to intervention by the Secretary of State - see the statement [here](#)). Should evidence come to light that the uncontrolled loss of other town centre uses to residential is having a significant harmful impact upon Norwich’s economy, then there may be scope to introduce further Article 4 Directions in the future which would enable development to be managed under this policy.
13. The Policy 6 approach can also influence public investment and infrastructure decisions to help support and retain a suitable mix of uses including retail, office and commercial leisure.

14. The reference to commercial premises is intended to support the business economy and cover trip attracting uses including those considered to be “main town centre uses” and this may be a better description. The authorities would accept a modification to clarify this point.