

Greater Norwich Local Plan Hearing Statement Matter 13 – Employment allocations

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:

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

**Issue 1: Employment allocations – new sites without planning permission.
Are the proposed site allocations below soundly based? In particular (where relevant):**

Site: Land known as ‘Site 4’, Norwich Airport (Ref GNLP1061R).

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

1. The allocation of site GNLP1061R (see [A2](#), pages 54-58 for the policy) is justified as it is an appropriate employment development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices; [A8.12](#) regarding Regulation 18C and [A8.20](#) regarding Regulation 19) and the settlement hierarchy. It has been assessed as a suitable and deliverable employment site in the Norwich Site Assessment Booklet ([B1.2](#)). It is a site which provides a unique opportunity for airport related development. The site benefits from inclusion in the airport masterplan which is endorsed by Norwich City Council and Broadland District Council. Ongoing discussions between the site promoter & the GNLP team working towards a statement of common ground for the site shall seek a revision to the site allocation policy to bring the proposals in line with the endorsed masterplan for the airport. This revision will allow for proportion of general employment; whilst applying a cap to ensure that sufficient land is available to attract additional large aviation-related business. It is hoped that general employment will act as a catalyst and securing non-aviation development to this site should provide a serviceable plot more likely to attract future aviation uses. The statement of common ground shall be agreed and made publicly available in advance of the EiP for sites at the beginning of March.

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

2. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Norwich site assessment booklet ([B1.2](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, planning officers from Norwich City Council, Minerals and Waste and the Lead Local Flood Authority. For site GNLP1061R the main constraints were identified as landscape impact, environmental impact and highways access, which are proposed to be mitigated through requirements in the policy (see [A2](#), pages 54-58).

3. Consultation comments were also taken into account (see Statement of Consultation A8.1 and associated appendices). In the case of site GNLP1061R Historic England requested an additional criterion relating to the Horsham St Faiths Conservation Area to the North of the site. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F63 to F66 and G3) assessed the impact on Historic Environment as 'negligible'. The allocation policy states: "*The site policy states that development would "be subject to landscape visual impact assessment and appropriate landscape mitigation to the northwest, north and northeast boundaries"* at criterion 5.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed?

Response to question 3

4. The availability of site GNLP1061R is confirmed through a Statement of Common Ground agreed with the promoter Norwich Airport Ltd ([D2.16](#)). This confirms that there are no ownership constraints and that the delivery of GNLP1061R is evidenced by the endorsement of the Norwich Airport Masterplan by Norwich City Council and Broadland District Council. The statement of common ground also confirms that Norwich Airport Ltd. currently have a planning application pending consideration on the site. An updated statement of common ground is currently in progress, it shall be complete in advance of the EiP for sites in March.

Question 4

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 4

5. The GNLP team and the site promoters have been engaged in ongoing discussions since the submission of the GNLP in July. A modification to the site allocation shall be proposed at the EiP to bring the site allocation in line with the adopted Norwich Airport Masterplan and the current planning application under consideration. The main focus of this modification is to allow for a proportion of general employment on the site whilst ensuring that sufficient land is related in order to attract additional large aviation-related businesses. The site allocation area shall also be clarified as part of this proposed modification as will some of the detailed policy requirements such as the timing of the Surface Access Strategy.

Site: South of Norwich Research Park extension, Colney (Ref GNLP0331BR).

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

6. The allocation of site GNLP0331BR (see [A2](#), pages 175-176 for the policy) is justified as it is an appropriate employment development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and [8.20](#) associated appendices) and the settlement hierarchy. It has been assessed as one of the most suitable and deliverable employment sites in the Non – residential urban fringe Site Assessment Booklet ([B1.48](#))

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

7. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Non – residential urban fringe Site Assessment Booklet ([B1.48](#)) . This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children’s Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0331BR the main constraint identified was the site being underlain by safeguarded mineral resources, therefore Minerals and Waste policy CS16 is referenced in the policy requirements (See [A2](#), page 175).
8. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F238 to 240 and G15) concludes that ‘this site is allocated to allow additional capacity up to 2038 for the continued growth of the allocated science park and hospital expansion proposals in the South Norfolk Local Plan (ref COL1)’.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed?

Response to question 3

9. The availability of site GNLP0331RB is confirmed through a Statement of Common Ground/Delivery Statement agreed with the promoter ([D2.54](#))

10. The deliverability of site GNLP0331BR is demonstrated in a number of different documents:
- Topic Paper for Policy 7.1 Norwich and Urban Fringe ([D3.9](#))
 - Statement of Common Ground ([D2.54](#))
 - Site Delivery Table ([D1.5](#))

Question 4

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 4

11. The policy requirements for site GNLP0331RB are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. Consultation comments have also been taken into account (see Statement of Consultation [A8.1](#) and [8.20](#) associated appendices). In the case of site GNLP0331RB reference to Minerals and Waste policy CS16 is included in the policy requirements in response to comments made by the Minerals and Waste Team.

Site: South of Norwich Research Park extension, Colney (Ref GNLP0331CR).

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

12. The allocation of site GNLP0331CR (see [A2](#), pages 177-178 for the policy) is justified as it is an appropriate employment development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and [8.20](#) associated appendices) and the settlement hierarchy. It has been assessed as one of the most suitable and deliverable employment sites in the Non – residential urban fringe Site Assessment Booklet ([B1.48](#))

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

13. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Non – residential urban fringe Site Assessment Booklet ([B1.48](#)). This process was robust and involved a number of different partners including Norfolk County Council

highways, district council development management colleagues, Children’s Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0331CR the main constraint was the site being underlain by safeguarded mineral resources, therefore Minerals and Waste policy CS16 is referenced in the policy requirements (See [A2](#), page 177)

Question 3

Has the availability, viability and deliverability of the site been robustly assessed?

Response to question 3

14. The availability of site GNLP0331RC is confirmed through a Statement of Common Ground/Delivery Statement agreed with the promoter ([D2.55](#))
15. The deliverability of site GNLP0331RC is demonstrated in a number of different documents:
 - Topic Paper for Policy 7.1 Norwich and Urban Fringe ([D3.9](#))
 - Statement of Common Ground/ Delivery Statement ([D2.55](#))
 - Site Delivery Table ([D1.5](#))

Question 4

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 4

16. The policy requirements for site GNLP0331RC are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and [8.20](#) associated appendices). In the case of site GNLP0331RC reference to Minerals and Waste policy CS16 is included in response to comments received from Minerals and Waste Team.

Site: South of Hethel Industrial Estate, Hethel (Ref GNLP2109)

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

17. The allocation of site GNLP2109 (see [A2](#), pages 293 and 294) is justified as it is an appropriate employment development site, taking account of reasonable alternatives and is supported by evidence. Its inclusion as an allocation has taken account of the sustainability appraisal (see [A6.3](#), section F.15.1), consultation comments (see Statement of Consultation [A8.1](#), and [A8.14](#)). GNLP2109 has been assessed as

amongst the most suitable and deliverable sites in Hethel (see site assessment booklet ([B1.49](#))).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

18. The constraints to development and any implications for infrastructure have been identified and evaluated through the non-residential main towns site assessment booklet ([B1.49](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Minerals and Waste and the Lead Local Flood Authority.
19. For site GNLP2109 the main constraints were masterplanning in accordance with the HETHEL 2 allocation, consideration of the Grade II Little Potash, managing flood risk, and requiring Ecological Impact Assessment. Conserving the setting of the Grade II Little Potash was also considered in a Heritage Statement ([B10.11](#)) that was produced in response to concerns raised by Historic England.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed?

Response to question 3

20. The availability of site GNLP2109 is confirmed through a Statement of Common Ground agreed with the promoter Raycone Ltd ([D2.88](#)). This confirms that there are no ownership constraints and that the delivery of GNLP2109 is evidenced by the recent successful completion of the adjacent Turing Park phase 1.

Question 4

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 4

21. The policy constraints for GNLP2109 were written following consultation with partners, including Norfolk County Council highways, district council development management colleagues, Minerals and Waste and the Lead Local Flood Authority. Consultation revealed that the main constraints were masterplanning in accordance with the HETHEL 2 allocation, consideration of the Grade II Little Potash, managing flood risk, and requiring Ecological Impact Assessment.

Issue 2: Employment allocations – sites currently allocated in an adopted development plan, without planning permission. Are the proposed site allocations below soundly based? In particular (where relevant):

Site: Land at The Neatmarket, Hall Road (Ref R1)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

22. Site R1 was allocated in the Norwich City Council Site Allocations and Site Specific Policies Local Plan 2014 ([C1.5](#)) which has an end date of 2026. R1 has recently delivered a car sales showroom on part of the site; the remainder of the site has yet to be developed at the base date of the GNLP and does not have planning permission, but the principle of development on the site has already been accepted. Since site R1 represents the opportunity for further employment development within the Hall Road Industrial Estate the allocation has been carried forward (see pages 118-120 of [A2](#) for the carried forward policy).

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

23. R1 is a site within the already established Hall Road employment area. Nearby are well-established businesses, and R1 would be well-suited to a business or light industrial use. The motor trade/car sales uses on the frontage of Hall Road referenced in the policy have recently been delivered. Keeping the allocation is logical in order to ensure there is choice in the market for employment land. The site owner remains committed to bringing forward the remainder of the site in the GNLP plan period to 2038 as confirmed in the agreed statement of common ground ([D2.35](#)).

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

24. The policy requirements for R1 are justified and effective. The policy wording has been taken from the Norwich City Council Site Allocations and Site Specific Policies Local Plan 2014 allocation ([C1.5](#)) and amended as appropriate following discussion with district colleagues and consultation. Additional policy requirements have been added to reflect the updated policy requirements of the GNLP.

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

25. Not applicable for R1, however it may be considered appropriate to put forward an amendment to remove the area of the site from the allocation which has now delivered the car sales showroom.

Site: Longwater Employment Area, Costessey (Ref COS 3 / GNLPSL2008)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

26. Site COS3/GNLPSL2008 was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)) which has an end date of 2026. The site is re-allocated with additional land promoted as GNLPSL2008 which will be incorporated within the settlement boundary as employment uses in this location remain appropriate. (see page 190-191 of [A2](#) for the carried forward policy).

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

27. The allocation represents the Longwater Employment Area which continues to thrive and the control of uses here remains appropriate. The COS 3 land was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)). These land parcels are the next sequential areas development and the inclusion of the GNLPSL2008 land is also a logical extension of the employment area given the permitted employment uses on site (see [A2](#), page 190)

28. The deliverability of site COS3/ GNLPSL2008 is demonstrated in a number of different documents:

- Topic Paper for Policy 7.1 Norwich and Urban Fringe ([D3.9](#))
- Site Delivery Table ([D1.5](#))

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

29. The policy requirements for site COS3/ GNLPSL2008 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. Regard has also been had to consultation comments (see Statement of

Consultation [A8.1](#) and [8.20](#) associated appendices). The policy requirements have been amended where appropriate. For site COS3/ GNLP0497 the main constraints identified were the need for protection of CWS to the north of the employment site and site being underlain by safeguarded mineral resources, therefore Minerals and Waste policy CS16 is referenced in the policy requirements (See [A2](#), page 190)

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

30. The proposed extension (see [A2](#), pages 190-191 for the policy) is justified and supported by evidence as it is an appropriate employment development site taking account of permitted employment uses on site, reasonable alternatives as supported by evidence.
31. In addition, consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and [8.20](#) associated appendices). Its inclusion as an extension to the allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site, specifically G16) which conclude that 'These land parcels are the next sequential areas for development and the inclusion of the GNLP0497 land is also a logical extension of the employment area. Therefore, COS 3 allocation is carried forward with the addition of GNLP0497'. As a result, it has been assessed as one of the most suitable and deliverable sites in the Non – residential urban fringe Site Assessment Booklet ([B1.48](#))

Site: Land west of Ipswich Road, Keswick (Ref KES 2 / GNLP0497)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

32. Site KES2 /GNLP0497 was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)) which has an end date of 2026. This site now has planning consent (reference 2017/2794) on a larger boundary that incorporates site GNLP0497. The carried forward allocation will be redrawn accordingly. This is reflected in the Site Policy (see [A2](#), pages 202-203)

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

33. This allocation is a combination of an existing allocation from the South Norfolk Local Plan ([C1.7](#)) coupled with a permission on a larger boundary (reference 2017/2794). The permission is now beginning to build out and it is expected that the whole development will take place over the new local plan period up to 2038. Therefore, the existing allocation is carried forward but on a larger site boundary. (see G16 [A6.3](#) for detailed assessments of the site),
34. The availability of site KES2 /GNLP0497 is confirmed through a Statement of Common Ground/Delivery Statement agreed with the promoter ([D2.64](#)) The deliverability of site GNLP0331RC is demonstrated in a number of different documents:
- Topic Paper for Policy 7.1 Norwich and Urban Fringe ([D3.9](#))
 - Statement of Common Ground/ Delivery Statement (([D2.64](#)))
 - Site Delivery Table ([D1.5](#))

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

35. The policy requirements for KES 2 / GNLP0497 are justified and effective. The policy wording has been taken from the South Norfolk Local Plan (2015) allocation ([C1.7](#)) and amended as appropriate following discussion with district colleagues and consultation. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and [8.20](#) associated appendices). In the case of site KES2/GNLP0497 an additional policy requirement has been added to reflect the need to conserve and enhance of nearby heritage assets and significance of setting for church of All Saints and remains of the Church of All Saints to the west of the site, at the request of Historic England. The position has been agreed through a Statement of Common Ground with Historic England (see ([B4.3](#))). In addition, a requirement for the inclusion of ecological appraisal with landscaping to the north as buffering to the Harford Bridge CWS and NWT Nature serve has been added at the request of Norfolk Wildlife Trust. As a result, the site has been assessed as one of the most suitable and deliverable sites in the Non – residential urban fringe Site Assessment Booklet ([B1.48](#))

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

36. The proposed extension to the site is justified and supported by evidence as this allocation reflects a planning permission on a larger boundary (reference 2017/2794). The permission is now beginning to build out and it is expected that the whole development will take place over the new local plan period up to 2038. Therefore, the existing allocation is carried forward but on a larger site boundary. In addition, the Sustainability Appraisal (see G16 [A6.3](#) for detailed assessments of the site) confirms the approach taken.

Site: Land at Dunkirk Industrial Estate (west), south of Banningham Road, Aylsham (Ref AYL3)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

37. Site AYL3 was allocated in the 2016 Broadland Site Allocations Plan ([C1.2](#)) which has an end date of 2026. AYL3 has yet to be developed at the base date of the GNLP and does not have planning permission, but the principle of development on the site has already been accepted. Since site AYL3 represents the opportunity for further employment development within the Dunkirk Industrial Estate the allocation has been carried forward (see pages 265-266 of [A2](#) for the carried forward policy).

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

38. AYL3 is a site within the already established Dunkirk Employment Area. Nearby are well-established businesses, and AYL3 would be well-suited to a business or light industrial use. Keeping the allocation is logical in order to ensure there is choice in the market for employment land. But due to difficulty in contacting the landowner it is unknown what interest there has been from potential end-users of the site.

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

39. The policy requirements for AYL3 are justified and effective. The policy wording has been taken from the Broadland Site Allocations Plan 2016 ([C1.2](#)) and amended as appropriate following discussion with district colleagues and consultation. The

changes in policy wording relate to removing requirements for off-site highways work, a transport assessment, upgrades for wastewater treatment, and SUDs. Due either to these requirements being no longer appropriate or because they are captured elsewhere by other policies.

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

40. This question is not relevant to AYL3, as the site boundary is unchanged from its original allocation.

Site: Land south of Spirketts Lane, Harleston (Ref HAR 7)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

41. Site HAR7 was allocated in the 2015 South Norfolk Site Specific Allocation Plan ([C1.7](#)) which has an end date of 2026. HAR7 has yet to be developed at the base date of the GNLP and does not have planning permission, but the principle of development on the site has already been accepted. Since site HAR7 represents the opportunity for further employment development within the Fuller Road Industrial Estate the allocation has been carried forward (see page 289-290 of [A2](#) for the carried forward policy).

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

42. HAR7 is a site within the already established Fuller Road Industrial Area. Nearby are well-established businesses, and HAR7 would be well-suited to a business or light industrial use. Keeping the allocation is logical in order to ensure there is choice in the market for employment land. But due to difficulty in contacting the landowner it is unknown what interest there has been from potential end-users of the site.

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

43. The policy requirements for HAR7 are justified and effective. The policy wording has been taken from the South Norfolk Site Specific Allocations Plan 2015 ([C1.7](#)) and was reviewed following discussion with district colleagues and consultation. But for HAR7 all the previously written policy requirements remain appropriate, and no changes were made, except for updates to the Use Classes Order.

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

44. This question is not relevant to HAR7, the site boundary remains unchanged from its allocation in 2015.

Site: Land South and South West of Lotus Cars, Hethel (Ref HETHEL 2)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

Hethel is a key location for the local economy, investment continues to be made, and most notably Hethel is home to Lotus Cars. As well as being a key strategic employment allocation, and a means for the Greater Norwich area to be a leader in a clean growth economy, a Statement of Common Ground has been provided by the owners Hethel Properties Ltd ([D2.89](#)). This confirms the land is available, viable and deliverable, and the Partnership is also confident in Hethel being a part of the area's economic strategy for the A11 Corridor.

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

45. HETHEL 2 is a long-term strategic allocation. The landowners Hethel Properties Ltd and the Partnership are both confident in its development during the plan period.

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

46. The policy requirements for HETHEL 2 are justified and effective. The policy wording has been taken from the South Norfolk Site Specific Allocations Plan 2015 ([C1.7](#)) and was reviewed following discussion with district colleagues and consultation. But for HETHEL 2 all the previously written policy requirements remain appropriate, and no changes were made.

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

47. This question is not relevant to HETHEL 2, as the site boundary remains the same as when allocated in 2015.

Site: Land at the former station yard, west of B1140, Acle (Ref ACL3)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

48. Site ACL3 was allocated in the 2016 Broadland Local Plan ([C1.2](#)) which has an end date of 2026. ACL3 has yet to be developed at the base date of the GNLP but does have previous consent for the employment use (20141460), this shows that the principle of development on the site has already been accepted. Since it is expected that development will take place within the time period of this local plan up to 2038, the allocation has been carried forward (see page 319 of [A2](#) for the carried forward policy).

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

49. ACL3 is allocated for a small-scale employment use and is currently in low-key employment use and has had a number of planning permissions for employment use in the past, as well as being allocated in the current Local Plan and proposed to be carried forward.

50. The site would be well suited to a small-scale business or light industrial where it is important to retain this type of employment land for future development opportunities and to ensure vitality across the market, such as those of Key Service Centres. It can be expected that development will take place within the time period of this local plan up to 2038.

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

51. The policy requirements for ACL3 are justified and effective. The policy wording has been taken from the Broadland Site Allocations Plan 2016 ([C1.2](#)) and amended as appropriate following discussion with district colleagues and consultation. The policy wording has also been amended to reflect the updates to the Use Class Order.

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

52. Not applicable for ACL3.

Site: Land adjacent to Hingham Industrial Estate at Ironside Way, Hingham (Ref HIN2)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

53. Site HIN2 was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)) which has an end date of 2026. HIN2 has yet to be developed at the base date of the GNLP and does not have planning permission, but the principle of development on the site has already been accepted. Since site HIN2 represents the opportunity for further employment development within the Hingham Industrial Estate the allocation has been carried forward (see page 350 of [A2](#) for the carried forward policy).

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

54. HIN2 is located on land adjacent to an existing industrial, where they are well-established business operating. It is important to retain this type of employment land for future development opportunities and to ensure vitality across the market, such as those of Key Service Centres.

55. HIN2 is made up of two landowners, who have both provided a Statement of Common Ground ([D2.106](#) and [D2.107](#)), in support of the site. The owner of the northern portion of HIN2 (circa 1.8 hectares) specifically states that the site is presently available, suitable and deliverable for development and it is intended development shall be commenced within 10 years. It can be expected that development will take place within the time period of this local plan up to 2038.

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

56. The policy requirements for HIN2 are justified and effective. The policy wording has been taken from the South Norfolk Local Plan allocation ([C1.7](#)) and amended as appropriate following discussion with district colleagues and consultation. The policy wording has also been amended to reflect the updates to the Use Class Order.

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

57. Not applicable to HIN2.

Site: Land adjacent to Loddon Industrial Estate, Little Money Road, Loddon (Ref LOD 3)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

58. Site LOD3 was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)) which has an end date of 2026. LOD3 has yet to be developed at the base date of the GNLP and does not have planning permission, but the principle of development on the site has already been accepted. Since it is expected that development will take place within the time period of this local plan up to 2038, the allocation has been carried forward (see page 358 of [A2](#) for the carried forward policy).

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

59. LOD3 is located on land adjacent to an existing industrial, where they are well-established businesses operating. It is important to retain this type of employment land for future development opportunities and to ensure vitality across the market, such as those of Key Service Centres. It can be expected that development will take place within the time period of this local plan up to 2038.

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

60. The policy requirements for LOD3 are justified and effective. The policy wording has been taken from the South Norfolk Local Plan allocation ([C1.7](#)) and amended as appropriate following discussion with district colleagues and consultation. The policy wording has also been amended to reflect the updates to the Use Class Order.

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

61. Not applicable for LOD3

Site: Ex MOD site, Pine Loke, Poringland (Ref POR 3)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

62. Site POR3 was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)) which has an end date of 2026. POR3 has yet to be developed at the base date of the GNLP and does not have planning permission, but the principle of development on the site has already been accepted. Since it is expected that development will take place within the time period of this local plan up to 2038, the allocation has been carried forward (see page 362 of [A2](#) for the carried forward policy).

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

63. POR3 sits beneath two radio masts which dominate the site and require access for maintenance. The site is therefore considered to be unsuitable for housing (or many other uses) and for this reason it is considered suitable for light industrial uses. The site was previously allocated adjacent to an existing industrial estate, where the principle of development has already been accepted. It is important to retain this type of employment land for future development opportunities and to ensure vitality across the market, such as those of Key Service Centres. It can be expected that development will take place within the time period of this local plan up to 2038.

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

64. The policy requirements for POR3 are justified and effective. The policy wording has been taken from the South Norfolk Local Plan allocation ([C1.7](#)) and amended as appropriate following discussion with district colleagues and consultation. The policy wording has also been amended to reflect the updates to the Use Class Order.

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

65. Not applicable to POR3.

Site: Land at Abbey Farm Commercial, Horsham St Faith (Ref SL2007/ GNLP4061/ HNF3)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

66. Site SL2007/GNLP4061/HNF3 was allocated as HNF3 in the 2016 Broadland Local Plan ([C1.2](#)) which has an end date of 2026. Site GNLP4061 was added as an extension to the allocation in the Regulation 19 version of the plan following representations made by the site promoter at Regulation 18C (see appendix 9f of the Statement of Consultation ([A8.16](#))). The majority of the site has yet to be developed at the base date of the GNLP but the principle of development on the site has already been accepted. A full planning application (20201787) for the erection of 7 commercial buildings for classes B2, B8 and E(g) was considered at the Broadland District Council Planning Committee on 29th July 2021 and delegated for approval subject to conditions. Since it is expected that development will take place within the time period of this local plan up to 2038, the allocation has been carried forward (see pages 441 and 442 of [A2](#) for the carried forward policy).

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

67. The fact that planning application 20201787 was delegated for approval subject to conditions in July 2021 demonstrates the site promoters willingness to bring forward the site and the likelihood that it will be developed within the plan period to 2038.

68. The promoter has submitted a Statement of Common Ground ([D2.132](#)) which states their intention to commence development in early 2022 with completion in 2022/23.

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

69. The policy requirements for SL2007/GNLP4061/HNF3 are justified and effective. The policy wording has been taken from the Broadland Local Plan allocation ([C1.2](#)) and amended as appropriate following discussion with district colleagues and consultation. Site GNLP4061 was added as an extension to the allocation in the Regulation 19 version of the plan following representations made by the site promoter at Regulation 18C (see appendix 9f of the Statement of Consultation ([A8.16](#))). Additional policy requirements were also added to reflect the proximity to Horsham Meadows County Wildlife Site in response to representations from Norfolk Wildlife Trust and regarding archaeological sensitivity of St Faith Priory in responses to representations from Historic England (see also appendix 9f of the Statement of Consultation ([A8.16](#))).

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

70. Not applicable to site SL2007/GNLP4061/HNF3. However the site promoter did request a revision to the site boundary at Regulation 19 to include the western landscaping bund and remove the area known as Block L which has been constructed and is now occupied. The GNLP authorities consider the allocation boundary as drawn to be sound but would not object to the Inspectors proposing a main modification to make the changes requested.

Site: Land at Old Railway Yard, Station Road, Foulsham (Ref FOU2)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

71. Site FOU2 was allocated in the 2016 Broadland Local Plan ([C1.2](#)) which has an end date of 2026. FOU2 has yet to be developed at the base date of the GNLP and does not have planning permission, but the principle of development on the site has already been accepted through the adopted plan. It is expected that development will take place within the time period of this local plan up to 2038, so the allocation has been carried forward for employment/commercial development (see pages 408 and 409 of [A2](#) for the carried forward policy).

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

72. No Statement of Common Ground (SoCG) is currently available for this site however there is no evidence to suggest that a site of this limited size, will not be developed before the end of the plan period in 2038.

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

73. The policy requirements for FOU2 are justified and effective. The policy wording has been taken from the Broadland Local Plan allocation ([C1.2](#)) and amended as appropriate following discussion with district colleagues and consultation. Additional policy requirements have been added to reflect the need to conserve and enhance the significance of the Foulsham Conservation area following comments made by Historic England and to recognise that Norfolk Minerals and Waste Core Strategy Policy CS16 applies.

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

74. Not applicable to FOU2.

Site: Land east of the A140 and north of Norwich International Airport, Horsham St Faith (Ref HNF2/GNLP0466R)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

75. Site HNF2/GNLP0466R was allocated in the 2016 Broadland Local Plan ([C1.2](#)) which has an end date of 2026. It has yet to be developed at the base date of the GNLP and does not currently have planning permission, but the principle of development on the site has already been accepted in the adopted plan. An outline application to develop the site (20211959) was submitted in October 2021 for the Broadway Enterprise Park comprising predominantly E (g) (I, ii,iii), B2 and B8 commercial and industrial uses, a possible filling station, hotel, sui generis uses and park and ride development. It is expected that development will take

place within the time period of this local plan up to 2038, so the allocation has been carried forward (see page 439 and 440 of [A2](#) for the carried forward policy).

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

76. A Statement of Common Ground has been prepared for this site ([D2.131](#)) which states that a planning application for 37.49 hectares of employment uses was submitted in October 2021 (20211959). There is a recycling centre on the site (completed 2021) and the main access road was granted consent by Norfolk County Council and is open and operational. This gives confidence that the site will be developed within the plan period to 2038 as indicated in the SoCG.

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

77. The policy requirements for HNF2/GNLP0466R are justified and effective. The policy wording has been taken from the Broadland Local Plan allocation ([C1.2](#)) and amended as appropriate following discussion with district colleagues and consultation. The emphasis of the policy has been changed slightly from the Broadland Local Plan which states that it is allocated for employment uses benefitting from an airport location to a full range of employment uses including those benefitting from a location close to the airport with the removal of clause 2 from the Broadland Local Plan.

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

78. Not applicable to HNF2/GNLP0466R

Site: Brooke Industrial Estate, Brooke (Ref BKE3)

Question 1

Is the allocation on track as expected within the existing development plan?

Response to question 1

79. Site BKE3 was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)) which has an end date of 2026. Much of the allocation has been built out as the Brooke Industrial Park has experienced incremental growth over time and it has now become an established employment site. There remains some opportunity for

growth, which this Policy seeks to promote. It is expected that this growth will take place within the time period of this local plan up to 2038 so the allocation has been carried forward (see page 472 and 473 of [A2](#) for the carried forward policy). It is important that the site remains as an employment site and that other uses, such as residential development are resisted given its location removed from established settlements such as the villages of Brooke and Poringland.

Question 2

If the allocation hasn't come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be developed in the plan period?

Response to question 2

80. Site BKE3 has come forward as expected and has been carried forward as an allocation to allow the remaining opportunities for growth to come forward and it would be reasonable to assume that this will take place within the time period of this local plan to 2038.

Question 3

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 3

81. The policy requirements for BKE3 are justified and effective. The policy wording has been based on the South Norfolk Local Plan allocation ([C1.7](#)) and amended as appropriate following discussion with district colleagues and consultation. Additional policy requirements have been added to acknowledge flood constraints and minerals resources and also the significance of the setting of grade II listed Arlington Hall following consultation comments made by Historic England.

Question 4

Is any proposed extension to the site justified and supported by the evidence?

Response to question 4

82. Not applicable to BKE3.

Issue 3: Employment allocations – sites with extant planning permission.

Site: Land at Holt Road, Norwich (Ref R30). Are the proposed site allocations below soundly based? In particular (where relevant):

Question 1

Does the site still benefit from an extant planning permission for employment development?

Response to question 1

83. The site benefits from an extant planning permission for employment. Planning application reference: 19/01147/F for “*Construction of vehicle hire depot including associated external storage, parking areas and creation of vehicular access*”. Was approved by Norwich City Council planning applications committee. The decision notice was issued on 14 August 2020; condition 1 of the consent requires the development to have begun before the expiration of three years from the date of the permission (14th August 2023).

Question 2

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 2

84. The policy requirements for R30 are justified and effective. The policy wording has been taken from the Norwich City Council Site Allocations and Site Specific Policies Local Plan 2014 allocation ([C1.5](#)) and amended as appropriate following discussion with district colleagues and consultation. Additional policy requirements have been added to reflect the updated policy requirements of the GNLP, these relate to ensuring compliance with the requirements of the Norwich Airport with regard to Airport safeguarding measures and reference to Norfolk Minerals and Waste Core Strategy as requested by the Minerals and Waste planning team.

Question 3

Is any proposed extension to the site justified and supported by the evidence?

Response to question 3

85. Not applicable to site R30; the site has been reduced in area in the GNLP to omit the northern element of the site. The site area of the allocation matches the site area of the recent consent.

Site: Land rear/east of Institute of Food Research (IFR), Colney (Ref COL 2 / GNLP0140C). Are the proposed site allocations below soundly based? In particular (where relevant):

Question 1

Does the site still benefit from an extant planning permission for employment development?

Response to question 1

86. This site was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)) but has not yet been fully developed out. The principle of development on this site has already been accepted and it is expected that development will take place within the new local plan time period up to 2038. The Norwich Research Park is a strategic location for employment and this allocation is carried forward. This is reflected in the Site Policy (see [A2](#), pages 179-180)
87. The availability of site COL1 is confirmed through a Statement of Common Ground/Delivery Statement agreed with the promoter ([D2.53](#)) The deliverability of site GNLP0331RC is demonstrated in a number of different documents:
- Topic Paper for Policy 7.1 Norwich and Urban Fringe ([D3.9](#))
 - Statement of Common Ground/ Delivery Statement ([D2.53](#))
 - Site Delivery Table ([D1.5](#))

Question 2

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 2

88. The policy requirements for site Ref COL 2 / GNLP0140C are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and [8.20](#) associated appendices). In the case of site COL 2 / GNLP0140C an additional policy requirement is made with respect to the need to conserve and enhance the significance of heritage asset and setting of heritage assets and Earlham Conservation area as per the comments made by Historic England. The position has been agreed through a Statement of Common Ground with Historic England (see [B4.3](#)). In addition, a requirement to comply with the waste core strategy policy CS16 has been added in response to comments made by Minerals and Waste team.
89. Overall, the Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site) particularly F224 – 227,G5) together with the Non – residential urban fringe Site Assessment Booklet ([B1.48](#)) confirm the employment site has been assessed as one of the most suitable and deliverable to carry forward.

Question 3

Is any proposed extension to the site justified and supported by the evidence?

Response to question 3

90. Not applicable for COL2 / GNLP0140C

Site: Land adjacent to Norwich Research Park (NRP), Colney (Ref COL 1). Are the proposed site allocations below soundly based? In particular (where relevant):

Question 1

Does the site still benefit from an extant planning permission for employment development?

Response to question 1

91. The site was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)) which has an end date of 2026. The science park and hospital related uses remain appropriate, and COL 1 is re-allocated as a strategic employment allocation. This is reflected in the Site Policy (see [A2](#), pages 172-174)

Question 2

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 2

92. The policy requirements for COL 1 are justified and effective. The policy wording has been taken from the South Norfolk Local Plan (2015) allocation ([C1.7](#)) and amended as appropriate following discussion with district colleagues and consultation. (see Statement of Consultation [A8.1](#) and [8.20](#) associated appendices). In the case of site COL1 an additional requirement was made with respects to the heritage assets and archaeology as per comments made by Historic England. The position has been agreed through a Statement of Common Ground with Historic England (see [B4.3](#)). Overall, The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site) particularly F219 – 223,G15) together with the Non – residential urban fringe Site Assessment Booklet ([B1.48](#)) confirm the employment site has been assessed as one of the most suitable and deliverable to carry forward.

Question 3

Is any proposed extension to the site justified and supported by the evidence?

Response to question 3

93. Not applicable to COL 1

Site: Land at Dunkirk Industrial Estate (east), south of Banningham Road, Aylsham (Ref AYL4)

Question 1

Does the site still benefit from an extant planning permission for employment development?

Response to question 1

94. The planning history for this site shows permission for light industry and storage uses in outline (20101569); a reserved matters scheme for a builders merchant (20111439); and a reserved matters scheme for three office buildings (20200130). Furthermore, a Statement of Common Ground has been received from the owners Gray's of Norwich Ltd ([D2.80](#)). This confirms that a first phase of business units are completed, and further discussions are taking place for the remainder of the site as well as to provide an estate road.

Question 2

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 2

95. The policy requirements for AYL4 are justified and effective. The policy wording has been taken from the Broadland Site Allocations 2016 ([C1.2](#)) and amended as appropriate following discussion with district colleagues and consultation. The changes in policy wording relate to removing requirements for off-site highways work, a transport assessment, upgrades for wastewater treatment, and SUDs, due either to these requirements being no longer appropriate or because they are captured elsewhere by other policies.

Question 3

Is any proposed extension to the site justified and supported by the evidence?

Response to question 3

96. This question is not relevant to AYL4, as the site boundary is the same as when allocated in 2016.

Site: Land north of Spirketts Lane, Harleston (HAR 6)

Question 1

Does the site still benefit from an extant planning permission for employment development?

Response to question 1

97. Recent planning history shows a positive approach by the landowners to bringing forward development. In 2013 a scheme was approved for outside storage (ref: 2013/1261) and in 2018 a commercial unit was approved on part of the site (2018/1904).

Question 2

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 2

98. The policy requirements for HAR6 are justified and effective. The policy wording has been taken from the South Norfolk Site Specific Allocations 2015 ([C1.7](#)) and was reviewed following discussion with district colleagues and consultation. But for HAR6 all the previously written policy requirements remain appropriate and no changes were made.

Question 3

Is any proposed extension to the site justified and supported by the evidence?

Response to question 3

99. This question is not relevant to HAR6, as the site boundary is the same as when allocated in 2015.