

Annette Feeney, Programme Officer

Greater Norwich Local Plan Team
County Hall
Martineau Lane
Norwich
NR1 2DH

georginabrotherton@lpppartnership.co.uk

Tel 01206 835150

Co. Reg. No. 5677777

11th February 2022

Dear Sirs/Madam,

**Greater Norwich Local Plan – Examination Hearing
Further Written Statement on behalf of Horsham Properties Ltd in Respect of
Inspectors Matters Issues & Questions (March 2022 Sessions)**

1. On behalf of our client Horsham Properties Ltd, we write to set out our further Written Statement on the Greater Norwich Local Plan for your consideration. Our Statement specifically responds to Matter 13, Issue 2, Questions 1 - 4 and specifically in relation to 'Site K' - Land at Abbey Farm Commercial Park, Horsham St Faith (Ref SL2007/GNLP4061/ HNF3). This submission should be read in conjunction with the plans submitted within our previous representations in response to the Regulation 19 Consultation, which have not been re-appended to this Statement.
2. This statement also sets out a small number of amendments to fine tune planning policy Ref SL2007/GNLP4061/ HNF3, Policy 7.4 and the settlement boundary for Horsham St Faith to ensure the Local Plan meets the relevant soundness tests set out in the National Planning Policy Framework (NPPF).
3. In summary, the requested changes and associated objections are:
 - **Site Reference SL2007/GNLP4061/HNF3** – request that the site allocation boundary be amended as follows:
 - Include the land immediately to the west of the existing Commercial Park, which currently serves as a bund (approximately 0.65 hectares) and forms part of the proposed development area to extend the Commercial Park.
 - Remove the land to the northern section of the Commercial Park measuring 0.75 hectares, known as 'Block L' approved under planning reference 20121385 and now built as it already forms part of the established Commercial Park - See Drawing no. LPP/120/GNLP/Plan 2 submitted with our Regulation 19 Pre-Submission Consultation representations dated 9th March 2021.

Managing Director:
John Lawson, BA (Hons), MPhil, MRTPI

Directors:
Sharon Lawson, BA (Hons), DipTP, MRTPI
Georgina Brotherton, BSc (Hons), MSc, MRTPI

Associate Director:
Natalie Makepeace, BA (Hons), MSc (Dist), MRTPI

Consultant:
James Lawson, BA (Hons), MA, MRTPI

**The Coach House, East Hill House,
76 High Street, Colchester, Essex, CO1 1UF**
www.lpppartnership.co.uk



- **Policy 7.4 ‘Village Clusters’** – request that the Table within this policy relating to Horsham St Faith is amended to reflect the proposed modification to Site Reference SL2007/GNLP4061/HNF3 – see revised Table submitted with our Regulation 19 Pre-Submission Consultation representations dated 9th March 2021.
 - **Horsham & Newton St Faith Settlement Boundary** - Object to the proposed settlement boundary and request that it is amended to encompass the proposed employment allocation GNLP2007/4061/HNF3; the existing bund immediately to the west of the Commercial Park, and the existing commercial buildings forming part of the Commercial Park (Block L), which have been constructed and are occupied - see Drawing No. LPP/120/GNLP/Plan 1 submitted with our Regulation 19 Pre-Submission Consultation representations dated 9th March 2021.
4. The above objections currently render the Local Plan unsound when considered against the related tests set out in paragraph 35 of the NPPF as the Local Plan would **not be Positively Prepared, Justified or Effective**.
5. Notwithstanding the above representations, it is considered that the identified soundness objections could be resolved through the inclusion of the proposed minor but important policy changes as set out as part of this Statement.

Inspectors Questions

Matter 13, Issue 2, Question 1 (Site K)- Is the allocation on track as expected within the existing development plan?

6. The majority of proposed allocation GNLP2007/GNLP4061/HNF3 falls within existing site allocation reference HNF3, allocated for employment uses within Broadland District Council Site Allocations Development Plan that was adopted in 2016. On behalf of the site owners, we can confirm that the allocation is on track to deliver employment uses in line with the existing Joint Core Strategy and Broadland Development Plan period that sets out growth up to 2026.
7. A full detailed planning application was submitted in September 2020, Reference 20201787 for the extension to the west of the existing successful Commercial Park with an additional seven commercial units for Classes B2, B8 and E(g) purposes; parking and servicing areas; ancillary infrastructure and structural landscaping including extension to earth bund; pedestrian footways and cycleway; creation of new vehicular access from Church Street and associated works.
8. The western extension development is expected to commence in 2022 with completion in 2023.
9. Site Reference GNLP2007/GNLP4061/HNF3 also includes a modest extension to the north of the Commercial Park for further employment uses, which is not covered by current planning application Reference 20201787. It is envisaged that this land would provide 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 area to enable a modest expansion to the north and which can be delivered during the GNLP Plan period.

Matter 13, Issue 2, Question 2 (Site K) - 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?

10. As explained in our response to Question 1, it is anticipated that development will commence in 2022 and be completed in 2023. A planning application was submitted in September 2020, Reference 20201787 for the extension to the west of the existing successful Commercial Park with an additional seven commercial units. Broadland Council has resolved to grant planning permission and planning permission is expected imminently. We can confirm that the site will be developed in the plan period.

Matter 13, Issue 2, Question 3 (Site K) - Are the detailed policy requirements that would apply to the allocation justified and effective?

11. With the exception of the Policy Map and settlement boundary, yes, it is considered that the detailed policy requirements set out in Site Reference GNLP4061/HNF3 are applicable, justified and would be effective. Our soundness objections relating to the Policy Map and settlement boundary are set out in detail below.

Site Reference GNLP4061/HNF3 Policy Map

12. It is requested that land between the existing Commercial Park and allocation HNF3 is included within Site Reference GNLP4061/HNF3. As explained in response to Question 1, a full detailed planning application was submitted in 2020, Reference 20201787 for the extension to the west of the existing successful Commercial Park with an additional seven commercial units for Classes B2, B8 and E(g) purposes.
13. The current planning application proposes the removal of the western earth bund to facilitate the western extension to enable the proper planning of the site for employment purposes. The local planning authority have not raised any objections to the removal of the western bund and Broadland Council Planning Committee in 2021, delegated authority to the Assistant Director – Planning to approve the planning application subject to conditions and addressing minor outstanding ecological and drainage matters, which are expected to be finalised imminently.
14. Therefore, to make the best use of the available land, the existing central bund is proposed to be removed. Otherwise, this would be surrounded by development on both sides, and would not perform the visual screening function as historically intended. Given that Broadland Local Planning Authority has endorsed the removal of the central bund to facilitate the development as part of planning application Reference 20201787, it is considered that the level of policy compliance should be reflected in the site allocation.
15. In conclusion, to enable the proper planning of the site for employment purposes to be fulfilled, the removal of the bund is required and is justified. It is therefore, requested that Site Reference GNLP4061/HNF3 boundary be amended to include the existing central bund area.
16. Without the proposed change to the boundary of Site Reference GNLP4061/HNF3, it would currently render the Local Plan unsound when considered against the related tests set out in

paragraph 35 of the NPPF as it would not be positively prepared, justified, or effective. It would not provide a suitable strategy to enable the proper planning of the site for employment purposes to be achieved, as the site boundary would be overly restrictive and the site's development would require the need to depart from the proposed Local Plan Policy allocation.

17. Notwithstanding the above representations, it is considered that the identified soundness objections could be resolved through minor but important changes to the policy map of Policy GNLP/2007/4061/HNF3 with the inclusion of the central bund area. Horsham Properties Ltd therefore, requests the policy map be amended to cover the area shown on Drawing No. LPP/120/GNLP/Plan2 submitted as part of LPP's Regulation 19 representations dated 9th March 2021. If this change is accepted, it is also requested that the figures for Horsham St Faith within the Table within Policy 7.4 'Village Clusters' is changed to reflect the proposed modification to the Policy GNLP/2007/4061/HNF3, in line with revised Table 7.4 included within LPP's Regulation 19 representations dated 9th March 2021.

Horsham and Newton St Faith Settlement Boundary

18. The site owners **object** to the proposed settlement boundary for Horsham St Faith and requests that it is amended to encompass the proposed employment allocation GNLP/2007/4061/HNF3; the existing bund immediately to the west of the Commercial Park (which we have requested is included within Site Reference GNLP/2007/4061/HNF3), and the existing commercial buildings forming part of the Commercial Park (Block L), which have been constructed and are occupied. The suggested amendments would provide a logical and defensible boundary and are considered appropriate and justified and would ensure that the Local Plan is both 'positively prepared' and 'justified', thereby meeting the soundness tests as detailed within paragraph 35 of the NPPF.
19. Furthermore, the approach applied to settlement boundaries within the draft GNLP is currently inconsistent. Within areas falling in South Norfolk District, settlement boundaries are extended to include all proposed allocation sites, however areas within Broadland District, such as Horsham and Newton St Faith, exclude proposed allocation sites in the settlement boundaries. It is considered that the current approach is inconsistent and not appropriate or effective and therefore, fails to adhere to the soundness test outlined within paragraph 35 of the NPPF. We therefore, object and request that a more consistent approach to the preparation of settlement boundaries is applied to the GNLP, with the justified and effective option being to extend settlement boundaries to include all proposed allocation sites.
20. Without a more consistent approach to settlement boundaries across the GNLP area, it would currently render the Local Plan unsound when considered against the related tests set out in paragraph 35 of the NPPF as it would not be positively prepared, justified, or effective.
21. Notwithstanding the above representations, it is considered that the identified soundness objections could be resolved by extending the settlement boundaries within the Broadland District to include all proposed site allocations.

Matter 13, Issue 2, Question 4 (Site K) - Is any proposed extension to the site justified and supported by the evidence?

22. Site Reference GNLP/SL2007/GNLP/4061/HNF3 proposes a modest extension to the north of the existing employment allocation HNF3 which is considered to be justified, and the site owners support the inclusion of this land.
23. The extension relates to a modest extension to the north of the Commercial Park for further employment uses. The proposals envisage the provision of a single building to the north of Block L supported by structural landscaping.
24. LPP's March 2020 representations in response to GNLP's Regulation 18 consultation included a Sustainability Assessment of the site using the methodology applied by the Council within the Housing and Economic Land Availability Assessment (2020) and identified the site's suitability, availability, and achievability for employment use.
25. 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 and the commercial units proposed as part of the western extension.
26. In summary, the small but important allocation 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. This is a sustainable and deliverable employment site, which requires the further requested policy support in order to provide a suitable level of planning certainty. 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. For the reasons set out above, and the evidence provided throughout the GNLP process, the proposed extension to site allocation HNF3 is justified, and the site owners support the land's inclusion within Site Reference GNLP/SL2007/GNLP/4061/HNF3.
27. On behalf of the site owners, it is also requested that land between the existing Commercial Park and allocation HNF3 is included within Site Reference GNLP/SL2007/GNLP/4061/HNF3. As explained in response to Question 1, a full detailed planning application was submitted in 2020, Reference 20201787 for the extension to the west of the existing successful Commercial Park with an additional seven commercial units for Classes B2, B8 and E(g) purposes.
28. The current planning application proposes the removal of the western earth bund to facilitate the western extension to enable the proper planning of the site for employment purposes. The local planning authority have not raised any objections to the removal of the western bund and Broadland Council Planning Committee in 2021, delegated authority to the Assistant Director – Planning to approve the planning application subject to conditions and addressing minor outstanding ecological and drainage matters, which are expected to be finalised imminently.

-
29. Therefore, to make the best use of the available land, the existing central bund is proposed to be removed. Otherwise, this would be surrounded by development on both sides, and would not perform the visual screening function historically intended. Given that Broadland Local Planning Authority has endorsed the removal of the central bund to facilitate the development as part of planning application Reference 20201787, it is considered that the level of policy compliance should be reflected in the site allocation.
30. In conclusion, to enable the proper planning of the site for employment purposes to occur, the removal of the bund is required and is justified. It is therefore, requested that Site Reference GNLPSL2007/GNLP4061/HNF3 boundary be amended to include the existing central bund area.
31. Without the proposed change to the boundary of Site Reference GNLPSL2007/GNLP4061/HNF3, it would currently render the Local Plan unsound when considered against the related tests set out in paragraph 35 of the NPPF, as it would not be positively prepared, justified, or effective. It would not provide a suitable strategy to enable the proper planning of the site for employment purposes as the site boundary would be overly restrictive and the sites development would require the need to depart from the proposed Local Plan Policy allocation.
32. Notwithstanding the above representations, it is considered that the identified soundness objections could be resolved through minor but important changes to the policy map of Site Reference GNLPSL2007/4061/HNF3 with the inclusion of the central bund area. Horsham Properties Ltd therefore, requests the policy map be amended to cover the area shown on Drawing no. LPP/120/GNLP/Plan2 submitted as part of LPP's Regulation 19 representations dated 9th March 2021.

We trust you will find the above representations to be useful and that they will be taken into account by the Inspector during the Examination.

Yours faithfully

Georgina Brotherton
Lawson Planning Partnership Ltd