
Greater Norwich Local Plan

Local Plan Examination

Matter 13: Employment

Representations on behalf of
Norwich Airport Ltd

February 2022

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1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Barton Willmore LLP on behalf of Norwich Airport Ltd (NAL), pursuant to Matter 13: Employment. This follows representations to the two Regulation 18 consultations: Growth Options and Site Proposals Documents in March 2018 and Draft Strategy in March 2020 as well as Regulation 19 Local Plan consultation in March 2021 in relation to NAL's land interest at Norwich Airport ('the Site'). NAL has also responded to Matter 2: Vision, Objectives and the Spatial Strategy for the Examination in Public. The Site has been known as 'Site 4, Norwich Airport' during the Local Plan consultation process.
- 1.2 Site 4 was granted consent in April and May 2020 by Norwich City and Broadland District Councils for a 50:50 mix of aviation and non-aviation employment uses. Since that application expired in August 2021, a new application has been submitted seeking the same uses over a slightly larger area (120,000sqm). It is anticipated that this current application will be determined by those two Councils in March 2022.
- 1.3 In addition, NAL and the Greater Norwich Local Partnership (GNLP) agreed a Statement of Common Ground in July 2021 on the proposed allocation at Norwich Airport (site reference: GNLP1061: Site 4, Norwich Airport), which was updated in October 2021 to incorporate both aviation and non-aviation uses. The representations to the previous consultations describe the Site and the proposed allocation in further detail.

2.0 MATTER 13: ISSUE 1 EMPLOYMENT ALLOCATIONS – NEW SITES WITHOUT PLANNING PERMISISON

Issue 1: Employment Allocations – new sites without planning permission

2.1 All these questions and responses relate to:

Norwich

a. Land known as 'Site 4', Norwich Airport (Ref GNLP1061R)

2.2 Are the proposed site allocations below soundly based? In particular, (where relevant):

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

2.3 NAL considers that the allocation is justified as it provides high quality employment space for aviation and non-aviation uses. The recently submitted and largely determined planning application and endorsed Airport Masterplan by Norwich City and Broadland District Councils, provide considerable evidence in support of this position. It can be delivered early in the Plan Period and is already attracting interest from occupiers.

2.4 The evidence that the GNLP submitted as part of the evidence base confirms that the site location adjacent to Broadland Northway (A1270) provides an excellent opportunity for development. Therefore, the scheme should be included as a proposed allocation in the Greater Norwich Local Plan.

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?

2.5 The environmental and other constraints to the development have been properly assessed through both the permission that was granted in 2020 and through the application that is currently being determined by Norwich City and Broadland District Councils, which includes a new Environmental Statement.

2.6 The application that is currently being determined by the two councils.

2.7 The Environmental Statement provides evidence on the following matters:

- Socio-Economics;
- Landscape and Visual;
- Air Quality;
- Noise; and
- Land Contamination.

2.8 Separate technical reports have been submitted that address the following matters:

- Archaeological Appraisal;
- Flood Risk Assessment and Drainage Strategy;
- Heritage Assessment;
- Preliminary Ecological Report;
- Transport Assessment; and
- Travel Plan.

2.9 All these documents have confirmed that there are no technical reasons for the application and for the proposed allocation in the emerging Local Plan not to be delivered during its Plan Period.

2.10 The planning application includes maximum parameters for the amount of floorspace and the building heights. The height parameters mitigate the scheme from neighbouring uses as well as being compliant with airport safeguarding requirements.

2.11 The Council has acknowledged through the updated Statement of Common Ground that the non-aviation floorspace is essential in order to facilitate future aviation uses.

3. *Has the availability, viability and deliverability of the site been robustly assessed*

2.12 The application that is currently being determined by Norwich and Broadland District councils proves that the scheme is available. The live planning application for aviation and non-aviation floorspace demonstrates that the scheme is also deliverable.

2.13 NAL owns the taxiways on the Site and has a good working relationship with Norwich City Council and Norfolk County Council which own the remainder of the Site, meaning it is available immediately.

2.14 The progress of the planning application, due to be determined in March 2022, shows that the scheme is deliverable and can provide high quality employment space at the start of the new Plan Period.

2.15 The scheme is viable on the basis of 50% aviation and 50% non-aviation floorspace, the latter enabling the key infrastructure required to serve future aviation uses that have higher associated construction costs than general employment.

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

2.16 NAL supports the specific policy requirement for the allocation but has highlighted to the Partnership that the site area should in fact be 43.66ha in line with the Airport Masterplan.

2.17 The following section provides comments in respect of the Policy.

i) Limit to amount of non aviation floorspace

2.18 NAL is supportive of the 50:50 split between aviation and non-aviation employment floorspace. The application that is currently being determined by Norwich City and Broadland District councils seeks the 50:50 split in line with the proposed allocation.

ii) Provision of a Design Concept Masterplan

2.19 The Application that is currently being determined by Norwich City and Broadland District councils includes an Illustrative Masterplan, which demonstrates how the scheme could come forward in the future. It is also accompanied by an Indicative Phasing Plan, in accordance with part ii) of the emerging Policy. The application is also accompanied by technical reports and an Environmental Statement, which provide further information on landscaping, ecology, drainage and sustainable transport measures. All of the reports conclude that there are no technical reasons for the Site not to be allocated in the Greater Norwich Local Plan.

2.20 The development is required to provide a 50:50 split between aviation and non-aviation employment floorspace. The non-aviation employment floorspace will provide the early infrastructure to support all the uses.

iii) Provision of a Surface Access Strategy prior to Occupation of any Development

- 2.21 The planning consent that expired in 2021 included a condition for the scheme to provide a Surface Access Strategy (SAS) prior to occupation for Phase 2.
- 2.22 NAL will continue to work with the Councils and other stakeholders to prepare and finalise the SAS for as soon as is achievable. Delays have occurred due to Covid-19, which significantly impacted the operation of the Airport and the ability to collect valid survey data. NAL has commenced the work on the SAS and has prepared a Strategy Framework document, which is currently being reviewed by Norwich City Council.
- 2.23 NAL considers it would be appropriate to allow a degree of flexibility in terms of when the SAS is to be implemented, given the time it will take to prepare this document, complete the necessary consultation and have it approved in writing. This will provide jobs early in the Plan Period, and ensure the site is enabled with upfront infrastructure without delay, supporting Greater Norwich's economy.

iv) Provision of a Mobility Hub

- 2.24 The current planning application makes provision for a mobility hub to the satisfaction of Norfolk County Council, and as set out by the emerging policy.
- 2.25 The expired planning consent includes a stipulation that the condition should not apply if the Highways Authority confirms that it does not need to deliver the hub, or after a period of 3 years from issue of a decision notice. NAL considers that this condition should remain in place.

v) Provision of a continuous footpath between Airport Terminal, pick up and drop off point and bus link and bus gate

- 2.26 The continuous footpath between the airport terminal building and the park and ride site has already been delivered by the Airport. Therefore, this requirement can be removed from the emerging Plan Policy.
- 2.27 In addition, the Airport has delivered a bus pick-up and drop-off area 100m from the terminal building's passenger pedestrian entrance. This should also be removed from the emerging Plan Policy.

2.28 Norwich Airport will facilitate the provision of bus link and bus gate across their land for which planning permission would be submitted and secured by Norfolk County Council. Policy wording should be clear on this.

vi) Provide vehicular access from the existing roundabout at Broadland Northway (A127)

2.29 The planning application that is currently being determined is an outline application with all matters reserved except for access. The detailed access consent shows the vehicular access from the existing roundabout to support both aviation and non-aviation employment uses. The access directly onto the A1270 provides excellent connectivity to the greater Norwich region.

vii) Consider Noise Impacts from the Airport and the Development Itself

2.30 The current planning application is supported by a Noise Environmental Statement chapter. The chapter considers the significance of noise effects from the Airport and the development itself.

2.31 The chapter concludes that that significance of noise from both the construction and operational phases of the development is 'negligible' In order to mitigate the impacts of the development the chapter provides noise control measures for the building services plant and through the submission of a detailed noise assessment through the Reserved Matters applications.

viii) Include a Landscape Visual Impact Assessment Appropriate Landscape Mitigation

2.32 The current planning application is also supported by a Landscape and Visual Impact chapter. The chapter provides further details of the measures which have been carried forward into the Land Use Parameter Plan. The measures in the Land Use Parameter Plan mitigate against the views from neighbouring settlements, including Horsham St Faiths.

2.33 The scheme also includes a Building Heights Parameter Plan, which not only considers building heights from an airport safeguarding perspective but has also been devised to mitigate against the landscape impacts.

2.34 The application is also supported by an Indicative Landscape Phasing Plan, which provides reassurance to the Councils that the landscaping buffers will come forward when the relevant phases are delivered.

ix) Changes of use are restricted by conditions on future Planning Applications

2.35 NAL is committed to the provision of a 50:50 split between aviation and non-aviation uses. The current outline application seeks an even split between aviation and non-aviation uses as well as a restriction on the amount of floorspace, which will be applicable across the whole Site.

2.36 In conclusion, NAL is supportive of the emerging Policy and is pleased that the Site is included for aviation and non-aviation uses in the new Local Plan.

2.37 NAL seeks the following minor adjustments to the Policy:

1. Acknowledge the relevance of the Airport Masterplan, which has been endorsed by both Norwich City and Broadland District Councils;
2. Provide flexibility around when the Surface Access Strategy is to be agreed in writing to allow development and occupation to commence without delay;
3. Remove the reference to the continuous footpath as that has already been provided by the Airport;
4. Remove the reference to the bus pick-up and drop-off as the Airport has already delivered the scheme; and
5. Provide clarity around the provision of the bus gate and link, which NAL is committed to facilitating across its land.

3.0 CONCLUSION

- 3.1 Site 4 was granted consent in 2020 for a 50:50 mix of aviation and non-aviation employment uses and is currently being renewed, seeking the same uses over a slightly larger area (120,00sqm (GEA)). It is anticipated that this current application will be determined in March 2022.
- 3.2 The progress of the planning application demonstrates that the scheme can be deliverable early in the Plan Period, which supports the Local Plan as a whole. The requirement for employment floorspace at the Site has been provided in the evidence supporting the Local Plan.
- 3.3 The Statement of Common Ground demonstrates how both NAL and the GNLP are aligned in bringing forward this high-quality employment opportunity, but flexibility is required in terms of the implementation of the Surface Access Strategy and bus link/gate requirements.

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