GREATER NORWICH LOCAL PLAN HEARING STATEMENT

Part 2: Matter 13 (Issue 1) – Employment Allocations – new sites without planning permission

Submitted by Planning Places Limited
On behalf of
Trustees of the First Viscount Mackintosh of Halifax and Trustees of CM Watt
Residual Trust

February 2022

- 1.1 The need for existing businesses to grow and expand in rural and urban areas outside settlement limits is not adequately addressed by the policies or new allocations of the Plan.
- 1.2 Given the restrictive nature / limited scope of Draft Policy 6¹ (see Annex 1) in addressing employment needs in rural areas discussed during Part 1 of the examination, the 'new employment allocations without planning permission' do not sufficiently address the requirements of the villages of the districts to remain vibrant active places that offer local employment opportunities. As a result, the Plan is not compliant with national planning policy. The Plan remains inadequate as the requirements of paragraphs 84 and 85 of the NPPF are not met.
- 1.3 Policy 7.4 only permits such business growth (if the busines exists within the settlement limits of a village classified within the 'village clusters') and as drafted, Policy 6 permits no new development in rural areas.
- 1.4 Without further modification, the Plan would not comply with the NPPF paragraph 84 and 85 which requires that planning policies and decisions enable:
 - "a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
 - b) the development and diversification of agricultural and other land-based rural businesses;"

And that:

"recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."

1.5 Both Policy 6 and Policy 7.4 need amendment to ensure the Plan is sound.

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¹ Policy 6 addresses only the following: needs of new allocations sites (para 1 and 3) start-ups (para2), specific industries (para 5), education (para 6) and town centres.

ANNEX 1

POLICY 6 - THE ECONOMY

- 1. Sufficient employment land is allocated in accessible locations to meet identified need and provide for choice. Opportunities for sustainable access to sites should be maximised through development proposals and infrastructure investment.
- 2. The needs of small, medium and start-up businesses are addressed through:
 - the allocation and retention of smaller scale employment sites across the area, with limited expansion where this can be justified;
 - encouraging the provision of small-scale business opportunities in all significant residential and commercial developments and through the appropriate use of rural buildings;
 - Encouraging flexible building design and innovative approaches in new and existing residential developments to encourage local working and business opportunities.
- 3. Larger scale needs are addressed through the allocation of sufficient land to provide a choice and range of sites, including key 101 strategic sites targeted at specific sectors. Investment strategies will ensure that a readily available supply of land is maintained throughout the plan period.
- 4. 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.
- 5. Tourism, leisure, environmental and cultural industries will be promoted and assisted

by:

- the general emphasis in this local plan on achieving high quality design, resource efficiency, environmental enhancement and retention of local distinctiveness;
- protection, enhancement and expansion of the green infrastructure network;
- encouragement for sustainable tourism initiatives and development that supports cultural industries;
- promotion of the creative industries cluster focussed on the city centre.
- 6. Opportunities for innovation, skills and training will be expanded through facilitating the expansion of, and access to, vocational, further and higher education provision.

Key strategic employment areas

Key strategic employment areas and their main uses are:

Strategic Employment area and their primary uses	Existing undeveloped land available (hectares, April 2018)	New allocations (hectares)	Total employment allocations (hectares)
Norwich city centre with a focus on expansion of office, digital and creative industries, retail and leisure provision	30.8 (all part of mixed-use sites)	0	30.8

The Norwich Airport area and in particular:			
a new site on the northern edge of the airport accessed directly from the Broadland Northway of 46.5ha and focussed on aviation related activities; and	35	46.5	81.5
a site of around 35ha at the A140/Broadland Northway junction and focussed on uses benefiting from an airport location			
Browick Interchange, Wymondham (for general employment uses)	22	0	22
Longwater - consolidation of activity through intensification of employment uses and completion of the existing allocation	12	0	12
Rackheath (for general employment uses)	25.6	0	25.6
The complex of general business parks at Thorpe St Andrew (Broadland Business Park, St Andrews Business Park and Broadland Gate);	33.1	0	33.1
Norwich Research Park including the Norfolk and Norwich University Hospital and the University of East Anglia; providing for significant expansion of health, higher education and science park activity	32.7	6.9	39.6
Hethel including a technology park of around 20ha managed to focus on advanced engineering and the growth of technology capabilities	20	0.8	20.8
The Food Enterprise Park at Easton/Honingham supporting the agri-food sector	18.7	0	18.7
Total	229.9	54.2	284.1

Town Centres

The development of new retailing, leisure, offices and other main town centre uses will be subject to the sequential approach and out-of-centre impact assessment, as defined by Government policy and guidance, and will be encouraged at a scale appropriate to the form and functions of the following hierarchy of defined centres:

1. Norwich city centre;

- 2. The town centres of Aylsham, Diss, Harleston and Wymondham, and within the Norwich urban area, the large district centres at Anglia Square/Magdalen Street and Riverside;
- 3. The large village and district centres of: Acle, Coltishall, Hethersett, Hingham, Loddon, Long Stratton, Poringland and Reepham, and within the Norwich urban area at Aylsham Road, Drayton Road, Bowthorpe, Dereham Road, Eaton centre, Earlham House, Harford Place (Hall Road/Sandy Lane), Larkman centre, Plumstead Road, Sprowston Road, Old Catton and Dussindale (Thorpe St Andrew). New district centres to be established in accordance with the Growth Triangle Area Action Plan;
- 4. Local centres, including new and enhanced local centres serving major growth locations.

Development and investment consistent in scale with the function of the centre are encouraged at all levels of the hierarchy to enhance the range of businesses and facilities available locally. Development should seek to enhance the environment and economy of centres, and of villages with more dispersed services, to protect their function and avoid the loss of commercial premises or local services.

Small scale <u>retail and leisure</u> developments serving local needs are encouraged to serve <u>new</u> residential developments and, subject to impact on local amenity, in existing residential areas and to support village life and promote active travel.