

REPRESENTATIONS TO REG 18 CONSULTATION ON GREATER NORWICH LOCAL PLAN

INTRODUCTION

The purpose of this document is to provide a response to the Regulation 18 consultation that has been made by the Greater Norwich Development Partnership (GNDP) in the preparation of the Greater Norwich Local Plan (GNLP). It is made on behalf of Building Partnerships (Site Ref: GNLP0466), Dencora, and Howe family. Specifically, this document responds to the Growth Options suggested in the Plan in relation to 'The supply of employment land', and embellishes the information submitted in relation land north of the Northern Distributor Road (NDR) as part of the 'Call for Sites' and the existing commitment HNF2.

POLICY BACKGROUND

Joint Core Strategy (JCS) - adopted March 2011

The currently adopted JCS identifies the site as being in a strategic location for employment under **Policy 9: Strategy for growth in the Norwich Policy Area** described as being 'a new business park of around 30ha associated with the Airport and focussed on uses benefiting from an airport location.'

The supporting text (para 6.12) also makes reference to this area by stating the following:

- **Airport area:** around 30ha of new business park focussed on a full range of employment uses benefitting from an airport location. DPD's will also ensure that sufficient land is available for aviation related uses.

Site Allocations DPD – adopted 2016 (Broadland District Council)

Adopted by Broadland District Council, the above described strategic policy in the JCS was translated into a more detailed policy allocation in the Site Allocations DPD. Policy HNF2 states that 35ha of land will be allocated for 'employment uses' benefitting from an airport location. An extract from the Plan with the full text relating to this site, accompanies this document as Appendix 1.

The allocation was the subject of significant debate at the Examination to the then proposed Plan and is reflected in the Inspectors Report in March 2016. Paragraphs 101 – 103 are attached as Appendix 2.

Site Allocations DPD – adopted December 2014 (Norwich City Council)

Whilst not directly related to the site which is the subject of this representation, Policy R30 The Paddocks, Holt Road, airport extension or development for general employment purposes, of the City Council Site Specification and Allocations DPD, is relevant as it makes reference to the need to provide land for airport related uses.

The Paddocks, Holt Road, is allocated for either:

- Airport operational uses, where an airport masterplan endorsed by the City Council, within two years from the adoption of this plan, demonstrates that the land is required for airport operational purposes, during the Planning Period, or:

- Development for general employment purposes (Classes B1, B2 and B8) where;
 - A – the agreed airport masterplan referred to above, demonstrates that the land will not be required for airport operational purposes during the plan period, or;
 - B – no masterplan for the airport has been endorsed by the City Council within two years from the date of adoption of this plan.

As the Site-Specific Allocations DPD was approved in December 2014, the airport operational uses described in this policy, fall away and the site is, thus, earmarked for general employment purposes.

A copy of this policy accompanies this document as Appendix 3.

Norwich Airport Draft Masterplan (July 2017)

The Norwich airport consulted on a draft masterplan which ended on 20th September 2017. This document sets out the context for the growth and development of Norwich Airport to 2030 and 2045. Section 8 of this document identifies how the airport will deal with future growth up to these dates. The potential growth is illustrated in two figures (Figure 9.1 Potential future growth to 2030, and Figure 9.2 Potential future growth to 2045) which are attached as Appendix 4.

The document describes how future growth can be accommodated within the airport boundaries. Specifically, Section 8 makes reference to ‘Site 4 or Imperial Park’.

In 2013, planning permission was granted on 41 hectares of land to the north of the runway known as Site 4, for 95,035 sqm of aviation-related employment uses. The site is located in the north-east corner of the airport comprising managed grass, taxiway, disused runway and apron. The Ground Run Enclosure used for engine testing is to the southeast of the site and the former fire training area is situated immediately to the east of the site comprising an area of concrete hardstanding, scrub and some trees. The current Fire Training Ground is situated to the west of the site.

This planning permission was subsequently amended in 2016 (District Ref 20161133 & 16/00965/VC) due to the end user for whom the detailed element was specifically designed having rationalised its use of existing premises and to make full use of anticipated access to the site from the new Northern Distributer Road, which is intended to open early 2018.

This part of the Airport which includes Site 4 is remote from the main Airport and, with the exception of retaining the required fire training facilities, has not been identified for any future airport operational or expansion requirements. The Airport Masterplan, therefore, seeks the flexibility to remove all or part of this area from within the operational boundary, depending on market demand for aviation and/or non-aviation related development.

THE SITE

The site has been submitted in the ‘Call for Sites’ consultation for the GNLP in May-July 2016. The subsequent Housing and Economic Land Availability Assessment (HELAA) identified the site (Site Ref GNLP0466) as ‘unsuitable’ in terms of contributing to the capacity assessment as part of the area already allocated for employment uses. In undertaking a constraints analysis there were no concerns over potential flood risk, loss of high quality agricultural land, ecology,

contamination or ground stability. The assessment does indicate a potential constraint relating to utilities capacity and contamination & ground stability.

In terms of utilities capacity, we believe that whilst additional infrastructure will be needed there are no significant constraints to prevent the site coming forward.

In terms of contamination & ground stability, we do not believe there are any significant constraints. The site will need to go through a programme of ground remodelling to level out some of the undulation. Any material for the land-fill (if required) can be sourced through local residential building sites nearby.

Given that the site is more clearly defined by the construction of the NDR we believe the designation needs to be re-defined to incorporate additional land and the type of uses that can locate on it.

THE PRINCIPLE OF DEVELOPMENT

The principle of development is established through the allocation of the site in the Broadland Site Allocations Local Plan (2016) for the following: 'Land east of the A140 and north of Norwich Internal Airport, Horsham St Faith (approximately 35ha) is allocated for employment uses benefiting from an airport location. This will be to provide a full range of employment uses benefiting from a location close to the airport'. In order for this site to come forward it will be necessary for a degree of ground modelling prior to the construction of an access road and services provided. To offset the significant costs of remodelling the site, we believe it will be necessary for other uses to be considered such as Petrol Filling Station, roadside services and a Hotel.

We believe that an allocation for general employment uses is entirely consistent with the aims and aspirations of the JCS and the absence of an airport reference does not preclude employment uses benefitting from such a location coming forward.

By dealing with the levels on the site, an access can be formed to a new Park & Ride site to the east of the proposed allocation allowing it to connect to the northern roundabout recently constructed as part of the NDR. Initial schematic masterplans showing how these elements can occur is attached as Appendix 5.

We believe that to restrict the intended development to 'employment uses benefiting from an airport location' unduly constrains the ability of this land to come forward. As previously described a degree of 'pump-priming' will be needed in order to deliver serviced land. It may be that some potential and existing business will wish to locate close to the airport, however, given that there has been land allocated under the City Councils Site Specific and Allocations DPD (Policy R30) at The Paddocks on Holt Road which has fallen away due to time, and some 41 hectares has been proposed as part of the Airport Masterplan (Site 4 or 'Imperial Park') we believe the proposed site is unreasonably constrained.

In addition, the site is effectively the wrong side of the newly constructed NDR which is a constraint to any 'link' there may be between the proposed site and the Airport. Once the land becomes serviced it will be open to companies who wish to benefit from an airport location to position themselves on this site. We do believe, however, that such companies will want to be south of the NDR. Whilst the proposed masterplan suggests that The Paddocks on Holt Road could become a long stay car park, we believe it could be put to a better use in providing sites for companies seeking an airport location. Equally, given that Site 4 (Imperial Park) is intended to deliver 41 hectares of land and be directly accessed from the southernmost roundabout of the airport junction of the NDR, we believe that companies wishing to benefit from an airport location will seek to position themselves on this site.

In essence, we believe that this proposed employment site north of the NDR is unduly constrained by existing planning policies and that there are alternative locations to suit firms wishing to benefit from an airport location.

RESPONSE TO REGULATION 18 OPTIONS

The Regulation 18 consultation sets out 6 options for the proposed growth generally throughout the Districts. These are as follows:

- 1. Urban Concentration:** Concentrating site allocations around Norwich and the fringe parishes, namely in the Norwich Policy Area.
- 2. Transport Corridors:** Concentrating growth around A11, A47/Dereham Road and A140 corridors, including a new settlement along one of these corridors.
- 3. Supporting the Cambridge/Norwich Tech Corridor:** Concentrating growth around the A11 corridor and the west fringe of Norwich, which lies between the Norwich Research Park and the Food Enterprise Zone.
- 4. Dispersal:** Dispersing most growth out to the Service and other villages, dependent upon availability of sites, location, access to services and deliverability.
- 5. Dispersal plus New Settlement:** This option is similar to Option 4 but would divert some growth in a dispersed manner to villages and concentrate it in a new settlement.
- 6. Dispersal plus Urban Growth:** Again, this option is similar to Option 5 but would locate more growth in the urban fringe (Within the North-East Growth Triangle) rather than a new settlement.

Of these options, my clients favour **Option 1** which concentrates development around the Norwich and the fringe parishes. Norwich is the main economic driver for the Greater Norwich Plan and arguably the county as a whole. In terms of generating jobs and enhancing the local economy we believe that a majority of the growth has to be focussed on the Norwich Policy area. Whilst recognising that there will be marginal benefits through Options 2 and 3, the focus should be on Norwich and the fringe parishes.

Within the Regulation 18 document, and specifically the section relating to 'The supply of employment land', there are three specific questions raised. Our response to these questions are set out below:

30. Which option or options do you support?

Option EC1: Broadly maintain the current supply of employment land

Whilst it is acknowledged that there is a significant level of undeveloped employment land, it should be recognised that the allocated land needs to be in locations where there is market demand. Much of the undeveloped employment land has not come forward for a variety of reasons (as indicated in the bullet-points at para 6.15 of the document), however, in the first instance, if it is poorly accessed or is constrained by contamination, its unlikely to attract commercial users. We believe that there are sites that should not continue to be allocated as they are very unlikely to come forward. A broad range of employment land needs to be continued to be supplied to provide as wide a choice as possible to the market.

Option EC2: Significantly reduce the overall level of supply while still maintaining choice and flexibility

This option to reduce the overall level of supply is not favoured unless it removes sites that have over the lifetime of the previous Plan (i.e. Joint Core Strategy) had no proposals to be implemented. Again, our response is similar to the above. The market requires sites that are fit for purpose and can be delivered efficiently. Those sites that have particular issues regarding access, servicing and contamination issues are unlikely to come forward.

Option EC3: Develop a criteria-based policy allowing windfall development

We would acknowledge that windfall sites may have a role to play as new technologies develop although this shouldn't be at the expense of allocated site.

31. Which allocated or existing employment sites should be identified as strategic sites and protected?

We suggest that those sites on the edge of the city and in prime locations benefiting from good access to the highway network should be protected.

32. Are there employment areas that should be identified as suitable for release for residential uses?

As already described earlier in this statement, we consider that there are a number of allocated employment sites that are never going to be developed in the foreseeable period because of their particular characteristics relating to access, contamination, etc. We believe there is merit in releasing these types of sites which are difficult to develop and looking proactively at these coming forward with alternative uses such as residential.

33. Are there any new employment sites that should be allocated?

These representations relate to the land to the north of the NDR which forms part of the Airport Business Park (identified in para 6.16 of the document). We are unaware of any other strategic sites other than those shown in this section of the document.

CONCLUSIONS

The land to the north of the NDR identified in this representation, is an opportunity to significantly contribute to the Greater Norwich economy. It will be able to produce a range of job opportunities and provide much-needed serviced land to the market. It is possible to bring forward this site with vigour using some 'pump-priming' to the development to deal with the initial costs of providing servicing. It is, therefore, requested that the intended allocation should not have any reference to providing 'employment uses' benefiting from an airport location. We would further request that the type of uses should extend beyond B1, B2 and B8 uses to incorporate roadside services (including Petrol Filling Station) and a hotel facility, as is the case on many business parks elsewhere.

We believe that the site is unconstrained, is deliverable, is needed to meet employment needs and will come forward for development.

