



**CODE** Development  
Planners



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**Supporting Statement  
for Regulation 18  
Consultation on Greater  
Norwich Local Plan**

**Land south of NRP  
South, Land east of  
NNUH and Land west  
of Hethersett Lane,  
NRP, Colney, Norwich**

**Bullen Developments Ltd**

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## **1 Introduction**

- 1.1 This Supporting Statement has been prepared on behalf of Bullen Developments Ltd to promote two employment extensions and one mixed use extension (employment and residential) to the Norwich Research Park (NRP) South, Colney, Norwich.
- 1.2 The three extensions, as shown on the submitted Illustrative Concept Masterplan, are:
- ) Land to the immediate south of the NRP South allocation;
  - ) Land within the internal access road permitted under outline planning permission 2012/1880/O located in close proximity to the proposed southern roundabout on Hethersett Lane;
  - ) Land to the east of the Norfolk and Norwich University Hospital (NNUH).
- 1.3 Land to the south of the NRP South allocation totals 6.2ha and is being promoted for employment uses similar to those already allocated and permitted at NRP South.
- 1.4 Land within the internal access road permitted under outline planning permission for NRP South (ref 2012/1880/O) but outside the allocation in the South Norfolk Site Specific Allocations and Policies Document (2015) close to the permitted southern roundabout on Hethersett Lane is approximately 1.6ha and is being promoted for employment uses similar to those already permitted at NRP South.
- 1.5 Land east of the NNUH is approximately 15.2ha in size and is being promoted for mixed use development to comprise employment use immediately adjacent to the NNUH, and residential use on land to the east immediately adjacent to the residential allocation in the Cringleford Neighbourhood Plan.
- 1.6 The sites are owned by MP Kemp Ltd and are under option to Bullens.
- 1.7 It is anticipated that the three NRP South extensions could come forward for development in the short term if there is a specific use or alternatively development could commence following completion of the existing NRP South land, which is anticipated in 2026.
- 1.8 Allocation of the land would help to meet the Greater Norwich and South Norfolk employment and housing requirements for the period to 2036.



## 2 Planning Context

### National Planning Policy Framework

- 2.1 The National Planning Policy Framework (NPPF), March 2012, introduces a 'presumption in favour of sustainable development' which it advises should be seen as a 'golden thread' running through both plan-making and decision taking. This requires local planning authorities to positively seek opportunities to meet the development needs of their area. Local Plans are required to meet objectively assessed needs with sufficient flexibility to adapt to rapid change unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or if specific policies in the Framework indicate development should be restricted.
- 2.2 The overarching emphasis of the NPPF is on the importance of supporting growth and economic development. Local planning authorities are required to 'proactively drive and support' sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs. It emphasises that 'every effort should be made objectively to identify and then meet the housing, business and other development needs of their area and respond positively to wider opportunities for growth' (paragraph 17).
- 2.3 Accordingly, the document confirms that the planning system should help to build a strong and competitive economy securing growth, creating jobs and prosperity, building on the country's inherent strengths and responding to global competition. Removing obstacles to business investment is a core theme running throughout the NPPF which emphasises that the planning system should encourage and not act as an impediment to economic growth. It confirms that significant weight should be placed on the need to support economic growth (paragraph 19).
- 2.4 In line with this approach, the NPPF emphasises that local planning authorities should plan proactively to meet the development needs of business and support the economy (paragraph 20). In drawing up local plans, local planning authorities should:
- ) set out clear economic vision and strategy which positively and proactively encourages sustainable economic growth;
  - ) identify strategic sites for local inward investment to match the strategy and meet anticipated needs over the plan period;
  - ) support existing business sectors and, where possible, identify and plan for new or emerging sectors. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow rapid response to changes in economic circumstances;
  - ) plan positively for the location, promotion and expansion of clusters where networks acknowledge driven hi-tech industries.



- 2.5 In order to facilitate this aim, the NPPF advises that local planning authorities should ensure that the local plan is based on adequate, up-to-date and relevant evidence taking full account of economic and market signals with regard to business needs. Accordingly, as part of their evidence base they should assess:
- ) the need for land or floor space for economic development, including both quantitative and qualitative needs for all foreseeable types of economic activity;
  - ) the existing and future supply of land available for economic development and its sufficiency and suitability to meet identified needs through employment land reviews.
- 2.6 The NPPF also set out the government's objective to 'boost significantly' the supply of housing in order to deliver a wide choice of high quality homes to meet future housing needs (paragraph 47). Accordingly, to boost the supply of housing, local planning authorities should;
- ) use their evidence base for Local Plans to meet the objectively assessed needs for market and affordable housing including identifying key sites;
  - ) identify and update annually deliverable sites to provide five years' worth of housing along with an additional 5% buffer. Local planning authorities with a 'record of under delivery' should provide a 20% buffer;
  - ) identify a supply of sites or broad locations for growth for years 6-10 and, where possible, years 11-15;
  - ) illustrate the expected rate of housing delivery and set out a housing implementation strategy;
  - ) impose housing density guidelines which reflect the local area.
- 2.7 Importantly, it also emphasises the importance of viability and costs in decision making to enable the development to be deliverable.
- 2.8 In summary, the NPPF introduces a presumption in favour of sustainable development which it advises should be seen as a golden thread running through both plan-making and decision taking. This requires local planning authorities to positively seek opportunities to meet the development needs of their area.
- 2.9 The overarching emphasis of the NPPF is on the importance of supporting growth and economic development. Local planning authorities are, therefore, required to proactively drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs.
- 2.10 The current consultation version of the NPPF retains this presumption in favour of sustainable development and also seeks to strengthen the role of development plans.



## Development Plan

- 2.11 Policy 9 of the adopted Greater Norwich Joint Core Strategy (2014) provides the strategy for growth within the Norwich Policy Area. For employment development, the policy states that, “strategic locations will include a significant expansion of health, higher education and, in particular, science park activity at the University of East Anglia/Norwich Research Park”. It continues that, “a first phase of 55ha will provide for uses limited to those appropriate for a science park (principally use Class B1(b)) with further phases dependent upon the achievement of this vision. It indicates that further detail on proposals will be developed through the preparation of development plan documents.
- 2.12 The South Norfolk Site Allocations and Policies Document contains more detailed information in this respect. For the Colney area, information is provided on the additional floor space required at NRP in the Joint Core Strategy.
- 2.13 Policy COL1 relates to land adjacent to the Norwich Research Park and allocates 39.4ha of land principally for a B1(b) science park development, hospital expansion and other proposals ancillary and complementary to these main uses. The policy sets out a number of criteria against which any planning applications for development on the land will be considered and these criteria include use, masterplan, transport, design and landscape and constraints.
- 2.14 There have been a number of planning permissions granted on the land allocated under Policy COL1 in the South Norfolk Site Allocations and Policies Document at NRP South:
- ) temporary planning permission for 350 car parking spaces;
  - ) outline planning permission for NRP South (reference 2012/1880/O) which provides for a total of 90,166sqm of floor space;
  - ) reserved matters approval for the Bob Champion building (5,010sqm);
  - ) reserved matters approval for the Quadram Institute Building (14,420sqm); and
  - ) reserved matters approval for a 742 multi-storey car park, internal access roads and southern roundabout on Hethersett Lane.
- 2.15 Outline planning permission has also been granted at NRP North under planning reference 2012/1477 and this permission provides for 65,000sqm of floor space for research and development and ancillary uses. As part of this outline planning permission, reserved matters have been approved for the Centrum Building (4,536sqm) and also the Leaf Systems building (1,000sqm).
- 2.16 It is, therefore, evident that land allocated for the expansion of the Norwich Research Park has and will continue to be delivered.



### 3 Employment growth options

3.1 The draft GNLP Regulation 18 Local Plan sets out two options for the growth of jobs: Option JT1 to deliver forecast jobs growth plus additional growth or Option JT2 to deliver business as usual forecast growth only. Option JT1 is the favoured option in the draft Local Plan.

3.2 We support Option JT1 for delivery of jobs growth and additional growth.

3.3 It is evident that since the preparation of the currently adopted Joint Core Strategy there has been an increasing focus on economic growth within the Greater Norwich Area and a recognition of the local, regional and global importance of such growth. In December 2013 the Greater Norwich City Deal was signed and predicted the following consequential employment growth:

- ) a step change in commercialisation on the Norwich Research Park with a significant rise in spin out businesses creating 3,000 new high value jobs by 2020;
- ) at least 300 new businesses and 3,000 high value jobs across the Local Enterprise Partnership Area;
- ) £100m additional private sector investment to support businesses' growth; and
- ) 13,000 additional jobs across Greater Norwich.

3.4 The Greater Norwich City Deal document states that 'The catalyst for new growth in the City Deal lies in the world renowned Norwich Research Park, an international centre of excellence in life sciences' and that the 'Norwich Research Park represents a huge economic opportunity'.

3.5 The City Deal seeks to harness the growth from three key clusters to bring economic benefits to Greater Norwich as a whole. One of the three clusters identified is the Norwich Research Park, where existing businesses will be encouraged to expand and enable new small and medium sized enterprises to capture and commercialise research and academic excellence in life sciences and biotechnology.

In April 2016 the Norwich Research Park was granted Enterprise Zone status and comprises one of 10 locations in Norfolk and Suffolk which make up the new Norfolk and Suffolk Enterprise Zone 'Space to Innovate'. This designation acknowledges the existing economic contribution made by the research park (12,000 employees with an annual research spend of £100m and home to over 70 commercial companies) and recognises the global potential for the continued expansion of the food, health and life sciences sectors at the site.

3.6 The Norfolk and Suffolk Economic Strategy (Nov 2017) sets out nine sectors in Norfolk and Suffolk that have competitive advantages for growth, particularly cross sector collaboration. One of the sectors is the life sciences and biotech sector where there are innovation, high-tech businesses and research



institutions with close links to the food, health, ICR and agriculture sectors. Norwich Research Park is identified as a key location at the forefront of global food and health research. Reference is made to the fact that the research park is Europe's largest single site hub of research, training, education and enterprise in food and health.

- 3.7 It is, therefore, evident that the Norwich Research Park already has, and will continue to have, a fundamental role in life science/medical research and development and innovation in the future.
- 3.8 While the existing outline planning permission for NPR South and NRP North are anticipated to be built out by 2026, it will be important to identify land for the future expansion of the research park to ensure that the full economic potential of the area is harnessed.
- 3.9 The draft Regulation 18 Local Plan states in paragraph 4.2 that in order to achieve the vision and objectives of the plan and to help drive economic growth the GNLP will include a number of different policies, one of which will enable development of strategic employment locations such as the Norwich Research Park.
- 3.10 We support the inclusion of a specific policy to recognise the importance of strategic employment sites such as the Norwich Research Park but we would also suggest that in order to meet the level of economic growth set out in the Greater Norwich City Deal and the subsequent translation of this growth into policy JT1 (forecast jobs growth plus additional growth) additional land will need to be allocated at NRP South for development either for a specific use in the short term, or for development on completion of the already permitted NRP floor space which is anticipated in 2026.

#### 4 **Extensions to Norwich Research Park South**

- 4.1 Land to the south of NRP South was submitted on behalf of Bullen Developments Ltd under the GNLP call for sites in 2016. The site was 64ha in size. The land has been given reference number GNLP0331 in the Housing and Employment Land Availability Assessment (HELAA) carried out as part of the background technical work for the draft local plan.
- 4.2 Over recent months as background technical work has commenced, three areas of land within Site GNLP0331 are now being promoted. These areas as shown on the submitted Illustrative Concept Masterplan (Drawing 180309 NRP ResiB1(b)):
- ) Land to the immediate south of the NRP South allocation;
  - ) Land within the internal access road permitted under outline planning permission 2012/1880/O located in close proximity to the proposed southern roundabout on Hethersett Lane;
  - ) Land to the east of the Norfolk and Norwich University Hospital (NNUH).





#### **Land to the immediate south of the NRP South Allocation**

- 4.3 This land is located to the immediate south of the NRP South site as permitted under outline planning permission 2012/1880/O. The site is bounded to the east by the Norfolk and Norwich University Hospital with various research and academic buildings. To the immediate north is NRP South as permitted under outline planning permission 2012/1880/O which provides for employment land, specifically offices, laboratories, academic space for research and development and buildings for health and health related uses. To the south is the Norwich southern bypass (A47) and to the west is Hethersett Lane.
- 4.4 The site is available and deliverable within the plan period to 2036. The commencement of development could start in the short term (1-5 years) if it was required for a specific use or alternatively, development could be commenced following completion of the NRP site which is anticipated in 2026.
- 4.5 The site totals 6.2ha of undeveloped agricultural land.
- 4.6 It is anticipated that employment uses similar to those permitted under the outline planning permission for NRP South could be delivered on the site, together with associated landscaping and infrastructure.
- 4.7 The proposed vehicular access point into the site is shown on the Illustrative Concept Masterplan and links directly from the southern boundary of NRP South.
- 4.8 A structural landscaping belt is proposed along the southern boundary of the site to take account of and mitigate against any impacts arising from the A47 Norwich southern bypass.
- 4.9 The site forms part of Site GNLP0331 assessed in the HELAA.
- 4.10 The HELAA shows that under the Constraints Analysis the following categories are assessed as 'green':
- ) access;
  - ) utilities;
  - ) infrastructure;
  - ) contamination and ground stability;
  - ) market attractiveness.
- 4.11 There are three categories shown as 'amber' under the Constraints Analysis:
- ) accessibility to services;
  - ) utilities capacity;
  - ) flood risk.



- 4.12 Detailed background technical work is currently ongoing in order to demonstrate the deliverability of the site but in responding to these constraints it should be noted that HELAA Site GNLP0331 has now been significantly reduced in size. As such, land to the south of the NRP South allocation is not constrained by flood risk. It is located in Flood Zone 1 which has a low probability of flooding and there are no areas of surface water flooding identified across the site.
- 4.13 In terms of utilities capacity, the Site Suitability Conclusions in the HELAA advise that mains water and sewerage infrastructure upgrades would be required, including a water recycling centre. Again, it is clear that these comments relate to the significantly larger Site GNLP0331 in the HELAA which totalled 64ha in size.
- 4.14 The Impacts Analysis carried out in the HELAA shows the following categories as green:
- ) historic environment;
  - ) open space and GI.
- 4.15 There are five categories that are identified as amber and these comprise:
- ) significant landscapes;
  - ) townscapes;
  - ) biodiversity and geodiversity;
  - ) transport and roads;
  - ) compatibility with neighbouring uses.
- 4.16 The Site Suitability Conclusions in the HELAA indicate that the site is within the southern bypass protection zone and so landscape mitigation is likely to be required. In addition, ecological mitigation will also be needed for the tree belt and the woodland. It is acknowledged that the site is located within the southern bypass protection zone but the Illustrative Concept Masterplan shows a significant structural landscaping buffer along the southern boundary of the site which would assist in mitigating against any landscape and visual impacts arising from the development. As part of this landscaping, ecological mitigation would be proposed to ensure that existing habitats are, where possible, retained and enhanced.
- 4.17 In terms of transport and roads, the Site Suitability Conclusions indicate that a suitable access may be possible and impact on local roads could be mitigated. It is not, therefore, clear why this particular category is shown as amber rather than green.
- 4.18 In summary, it is not considered that there are any constraints to development of land to the immediate south of the NRP South allocation.



**Land within the internal access road permitted under outline planning permission 2012/1880/O located in close proximity to the proposed southern roundabout on Hethersett Lane**

- 4.19 This land is also located to the south of the NRP South allocation. It is to the west of Hethersett Lane in close proximity to the new southern roundabout on Hethersett lane. It is contained with an internal access road that has already been approved under the outline planning permission for NRP South (2012/1880/O) but it does not form part of the existing allocation and so the land itself did not form part of the outline planning application.
- 4.20 The site is approximately 1.6ha in size and forms a logical extension to NRP South. It is bounded to the south by an internal access road that has already been permitted under the outline planning permission. To the immediate north and east is NRP South, as permitted.
- 4.21 It is anticipated that employment uses similar to those permitted under the outline planning permission for NRP South could be delivered on the site, together with any associated landscaping.
- 4.22 Access to the land would be from the infrastructure and internal access roads already permitted under the outline planning permission for NRP South.
- 4.23 The site forms part of the larger Site GNLP0331 which was assessed as part of the 2017 HELAA.
- 4.24 Paragraphs 4.11 to 4.17 above outline the constraints that have been identified for development on the larger site GNLP0331 in the HELAA and put forward reasons why it is not considered that these should prevent allocation and development of the smaller sites now being promoted as extensions to NRP South.
- 4.25 In summary, it is not considered that any of the matters raised in the HELAA assessment of the 65ha site GNLP0331 would prevent development of 1.6ha of land to the west of Hethersett Lane, within the internal access road already permitted under outline planning permission 2012/1880/O for NRP South.

**Land to the east of the Norfolk and Norwich University Hospital (NNUH)**

- 4.26 This land is situated east of the NNUH and is currently undeveloped agricultural land.
- 4.27 It is being promoted for a mixed use extension to NRP South, with 8.9ha of land adjacent to the NNUH proposed for employment use and 6.3ha to the east being put forward for residential use. The total site area is 15.2ha.



- 4.28 The site is located adjacent to a significant residential allocation in the Cringleford Neighbourhood Plan and the Illustrative Concept Masterplan therefore shows the part of the site next to the allocation as residential, with a structural landscaping buffer between the proposed employment and the residential uses. Further structural planting is proposed along the southern boundary of the site to mitigate against any impact arising from the Norwich Southern Bypass.
- 4.29 Access is proposed from Colney Lane, as shown on the Illustrative Concept Masterplan.
- 4.30 This site also forms part of the larger Site GNLP0331 which was assessed as part of the 2017 HELAA and the conclusions drawn in Paragraphs 4.11 to 4.17 above remain the same. In summary, it is not considered that any of the matters raised in the HELAA assessment of the 65ha site GNLP0331 would prevent development of the 15.2ha site located to the east of the NNUH for part residential use and part employment use.

## 5 Conclusions

- 5.1 We support jobs growth option JT1 which equates to approximately 45,000 jobs in the period 2015 to 2036. This level of growth is evidenced in the Employment, Town Centres and Retail Study (2017) prepared as part of the technical work for the draft local plan.
- 5.2 Land to the south of NRP South, Colney was promoted in 2016 for employment use under the GNLP 'call for sites'. Since this time, background technical work has helped to refine the land proposed for development which now comprises three areas:
- ) land to the south of the NRP South allocation - 6.2ha of land being promoted for employment use similar to those permitted for NRP South under the outline planning permission 2012/1880/O;
  - ) land outside the existing allocation but within the internal access located close to the southern roundabout on Hethersett Lane which was permitted under outline planning permission 2012/1880/O for NRP South; and
  - ) land to the east of the Norfolk and Norwich University Hospital – 8.9ha of land being promoted for employment use and 6.3ha being promoted for residential use.
- 5.3 The three sites are suitable, available and deliverable.
- 5.4 They are well located to help achieve the economic growth and jobs targets set out in the draft Regulation 18 Local Plan, the Greater Norwich City Deal and the Norfolk and Suffolk Economic Strategy. Allocation of the land for future development will also help to enhance the Enterprise Zone and provide additional land in the right location to accommodate specialist research in food, health, life and medical sciences.
- 5.5 Development on the employment sites could commence in the short term (1-5 years) if required for a specific use or, alternatively, after completion of the NRP site which is anticipated in 2026.





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