

**Greater Norwich Local Plan Team**

County Hall  
Martineau Lane  
Norwich  
NR1 2DH

*michaelpingram@lppartnership.co.uk*

*Tel 01206 835150*

Co. Reg. No. 5677777

9<sup>th</sup> March 2021

Dear Sir/Madam

**Greater Norwich Local Plan – Regulation 19 Pre-Submission Draft Consultation (March 2021) – Representations on behalf of Horsham Properties Ltd**

On behalf of our client Horsham Properties Ltd, owner of Abbey Farm Commercial Park, at Horsham St Faith, we write to provide our representations in respect of the Greater Norwich Local Plan, Regulation 19 Pre-Submission Draft Plan, published February 2021. These representations have been prepared having regard to the tests of soundness for Plan Making set out in paragraph 35 of the National Planning Policy Framework (NPPF).

This letter comprises our representations regarding Site Reference GNLP2007/4061/HNF3 – Land at Abbey Farm Commercial Park, Horsham St Faith, that is proposed to be allocated for employment uses within the Greater Norwich Local Plan (GNLP).

This letter also provides representations on Policy 6 ‘The Economy’ and Policy 7.4 ‘Village Clusters’ contained within Part 1 The Strategy set out within the draft GNLP.

In summary, the site owners of Abbey Farm Commercial Park:

- ❖ Support the inclusion of land to the north and west of Abbey Farm Commercial Park as an employment allocation reference GNLP2007/4061/HNF3, but **Object** to the proposed allocation area boundary and request that it be amended to include the parcel of land immediately to the west of the existing Commercial Park, currently serving as a bund. The inclusion of the bund area is considered appropriate and justified and this amendment would ensure that Policy GNLP2007/GNLP4061/HNF3 complies with the tests of soundness set out at Paragraph 35 of the NPPF.
- ❖ **Support** the revised wording to Policy 6 ‘The Economy’ as it provides sufficient flexibility for future expansion to existing small and medium employment sites across the GNLP area. The revised policy is therefore considered to be ‘sound’ and complies with the tests of soundness set out at Paragraph 35 of the NPPF.
- ❖ Support the revised wording to Policy 7.4 ‘Village Clusters’ but **Object** to the Table within this policy and request amendments are made to the Table so that the site areas included for Abbey Farm Commercial Park are correct.

- ❖ **Object** to the inconsistent approach within the Greater Norwich Local Plan to applying settlement boundaries, and request that a consistent approach is adopted and in line with areas falling within South Norfolk district, whereby all proposed site allocations are included within settlement boundaries.
- ❖ **Object** to the proposed settlement boundary for Horsham St Faith and request that it is amended to encompass the proposed employment allocation GNLPSL2007/4061/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. The suggested amendments would provide a logical and defensible boundary and are considered appropriate and justified and would ensure that this settlement map complies with the tests of soundness set out at Paragraph 35 of the NPPF.

In support of these representations, we enclose the following information:

- ❖ A site location plan that outlines the proposed revised boundary for employment allocation GNLPSL2007/4061/HNF3;
- ❖ A revised Table to be included within Policy 7.4 Village Clusters; and
- ❖ A revised settlement boundary map for Horsham and Newton St Faith.

### Background & Planning History

Abbey Farm Commercial Park, established in the 1980's, is located approximately halfway along the western edge of the village of Horsham St Faith, towards the southern end of Broadland District, and is a significant local employment provider containing twelve buildings used for general and light industrial, as well as offices and warehousing (falling within Classes B1 (now Class E), B2 and B8). The site is accessed via Church Street, which directly links to the A140 and NDR beyond.

The land to the west of the Commercial Park (approximately 2.9 hectares) forms a substantial part of proposed employment allocation GNLPSL2007/4061/HNF3 and is already allocated for employment uses (Policy HNF3) within the Broadland District Council Site Allocations Development Plan Document (2016).

In September 2020, a planning application was submitted to Broadland District Council for the extension to the west of the existing successful Commercial Park with an additional seven commercial units. Further improvements include a new vehicular access point and an extended footway/cycleway to connect the site to the wider Horsham St Faith settlement. The planning application is expected to be positively determined in Spring 2021.

### Policy GNLPSL2007/4061/HNF3

The site owners support the inclusion of Policy GNLPSL2007/4061/HNF3 – Land at Abbey Farm Commercial Park for employment uses but **Object** to the proposed allocation area boundary. It is requested that two revisions are made to the proposed allocation area as follows:

1. 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, is included within proposed employment site allocation; and
2. 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 is removed from the proposed employment allocation as it already forms part of the established Commercial Park.

A site location plan that outlines the requested revised boundary for employment allocation GNLPSL2007/4061/HNF3 is enclosed.

As noted above, 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. This application proposed 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 the planning application is due to be determined this Spring. The inclusion of the western bund within the proposed employment allocation is therefore considered to be appropriate and justified.

In 2012 planning permission was granted (reference 20121385) for an extension of the Commercial Park in the north. These buildings, known as Block L, have been built and are occupied and therefore it is requested that the settlement boundary is redrawn to exclude these buildings from the proposed employment allocation.

In summary, revisions to the boundary for site GNLPSL2007/GNLP4061/HNF3 are requested and if made, would ensure that the policy complies with the tests of soundness set out at Paragraph 35 of the NPPF.

## Policy 6 – The Economy

Within our Regulation 18 representations in March 2020, it was outlined that the draft GNLP seeks to support small and medium sized businesses within both urban and rural areas by allocating sufficient employment land and allowing for windfall sites to come forward. However, there was concern that Policy 6 'The Economy' did not provide a flexible policy basis to accommodate the needs not anticipated by the Local Plan or to enable the expansion of existing small and medium size employment sites across of the GNLP area, thereby not aligning with the NPPF or adopted Joint Core Strategy Policy 5 'The Economy'. It was therefore requested that the policy be amended to allow for the expansion of existing small and medium sized employment sites, such as the Abbey Farm Commercial Park site, as per below.

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 **and the potential expansion of, a range of existing small and medium sized sites (LPP suggested text);***
- *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.*

It is acknowledged that, while the exact suggested wording has not been incorporated within the Pre-Submission Draft Plan, the first bullet point is now proposed to read as follows:

- *the allocation and retention of smaller scale employment sites across the area, **with limited expansion where this can justified;***

The site owners **support** this additional wording and consider that it would provide sufficient flexibility for existing employment sites, such as Abbey Farm Commercial Park to undertake future limited expansion, if required and subject to meeting other policy requirements of the GNLP. This updated text is therefore considered to be consistent with the NPPF Soundness Tests, in so far as it is justified, effective, compliant with national policy and has been positively prepared.

### Policy 7.4 – Village Clusters

Within the previous representations submitted March 2020, the site owners expressed concern that draft Policy 7.4 was not flexible enough to meet the changing requirements of businesses and requested that the penultimate paragraph of Policy 7.4 be amended to allow for the expansion of small and medium sized sites, such as Abbey Farm Commercial Park, as follows:

- *Other small-scale employment development will be acceptable in principle elsewhere within village development boundaries or through the re-use of rural buildings **or through the potential expansion of existing small and medium sized employment sites (LPP suggested text)** subject to meeting other policies in the development plan.*

The policy has been revised to include LPP's suggested revisions and the site owners **support** the updated draft policy wording included within the Pre-Submission Draft. This part of draft policy 7.4 is therefore considered to be consistent with the NPPF Soundness Tests, in so far as it is justified, effective, compliant with national policy and has been positively prepared.

Policy 7.4 includes a table that identifies allocated employment areas within Village Clusters. Within our earlier representations, it was noted that Horsham and Newton St Faith were identified as a village cluster but the table within Policy 7.4 did not include the existing employment allocation for land west of Abbey Farm Commercial Park. Given that the site was allocated and proposed to be carried forward as an employment allocation in the GNLP, it was requested that the site was included in the table.

The Pre-Submission Draft has been revised and the landowners support the inclusion of the existing employment allocation within the table set out in Policy 7.4 but **Object** to the site areas contained within the table. It is requested that two amendments are made to the table, as detailed below.

1. 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, is included within proposed employment site allocation Reference GNLP/SL2007R/4061/HNF3 and the site area updated within the Table to reflect its inclusion.
2. 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, is identified as a 'New Allocation' for employment purposes. It is requested that the table is revised to exclude this area to accurately reflect

that these buildings form part of the existing Commercial Park and not part of proposed employment allocation GNLPSL2007/4061/HNF3.

For completeness, it is requested that Table 7.4 is revised as follows:

Location	Existing undeveloped employment allocations (hectares, April 2018)	New allocations (hectares)	Total employment allocations (hectares)
See policies 1 and 6 for the strategic site at Hethal	20	0.8	20.8
Brooke	4.8	0	4.8
Foulsham	1.1	0	1.1
Horsham St Faith	2.9	1.4	4.3
Lenwade	2.4	0	2.4
Lingwood	2.3	0	2.3
Total	33.5	2.2	35.8

### Settlement Boundaries and Horsham and Newton St Faith Settlement Map

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 it 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.

The Settlement Map for Horsham and Newton St Faith forms part of the draft GNLP and shows the existing settlement boundary (purple dashed line) around the majority of Abbey Farm Commercial Park. However, it does not include the set of industrial buildings known as Block L, which form part of the Commercial Park, and which have been constructed and are occupied. It does also not include the proposed employment land allocation GNLPSL2007/4061/HNF3, or the western bund.

In March 2018, LPP wrote in response to the GNLP Regulation 18 Site Proposals Consultation Document, and again in December 2018 in response to the GNLP Site Proposals Addendum (New, Revised & Small Sites) Consultation. Further representations were also made in March 2020 in response to the Greater Norwich Local Plan, Regulation 18 - Part 1, The Strategy and Part 2 Site Allocations Consultation. Within these representations, it was requested that the settlement boundary be extended around the allocated part of the Commercial Park, (including the western bund), as well as the existing industrial land for the following reasons.

In 2012 planning permission was granted (reference 20121385) for an extension of the Commercial Park in the north. These buildings have been built and are occupied and therefore it is requested that the settlement boundary is redrawn to include these buildings to reflect the current limits of the existing operational Commercial Park.

In addition, the site owners reaffirm their stated intention to develop the allocated land to the west, with a planning application having been submitted in September 2020, reference 20201787 and due to be determined in Spring 2021 being a clear demonstration of this.

Given the justification provided, the extension of the settlement boundary to incorporate the proposed employment allocation site GNLPSL2007/4061/HNF3; the parcel of land immediately to the west of the existing site (currently serving as a bund); and the existing industrial development to the north, is considered to be logical and would help to ensure the Local Plan is both 'positively prepared' and 'justified', thereby meeting the soundness tests as detailed within paragraph 35 of the NPPF.

A plan defining the suggested revised settlement boundary is enclosed.

### **Changes Requested To Make The Plan Sound**

The following changes to the Plan are therefore respectfully requested in order to make the Plan Sound in the context of these representations;

1. Revise the proposed employment allocation area boundary reference GNLPSL2007/4061/HNF3 to include the western bund but exclude Block L, in line with the enclosed Plan;
2. Revise the Table within Policy 7.4 'Village Clusters' to accurately reflect the size of the proposed employment allocation GNLPSL2007R/4061/HNF3 and incorporating the suggested revisions detailed in this letter, and the removal of Block L in line with the attached Table;
3. Revise the inconsistent approach to applying settlement boundaries to include all proposed site allocations within the settlement boundary, in line with the approach used for sites located within South Norfolk district; and
4. Revise the settlement boundary for Horsham and Newton St Faith to include the proposed employment allocation GNLPSL2007/4061/HNF3, the western bund and Block L, in line with the enclosed Plan;

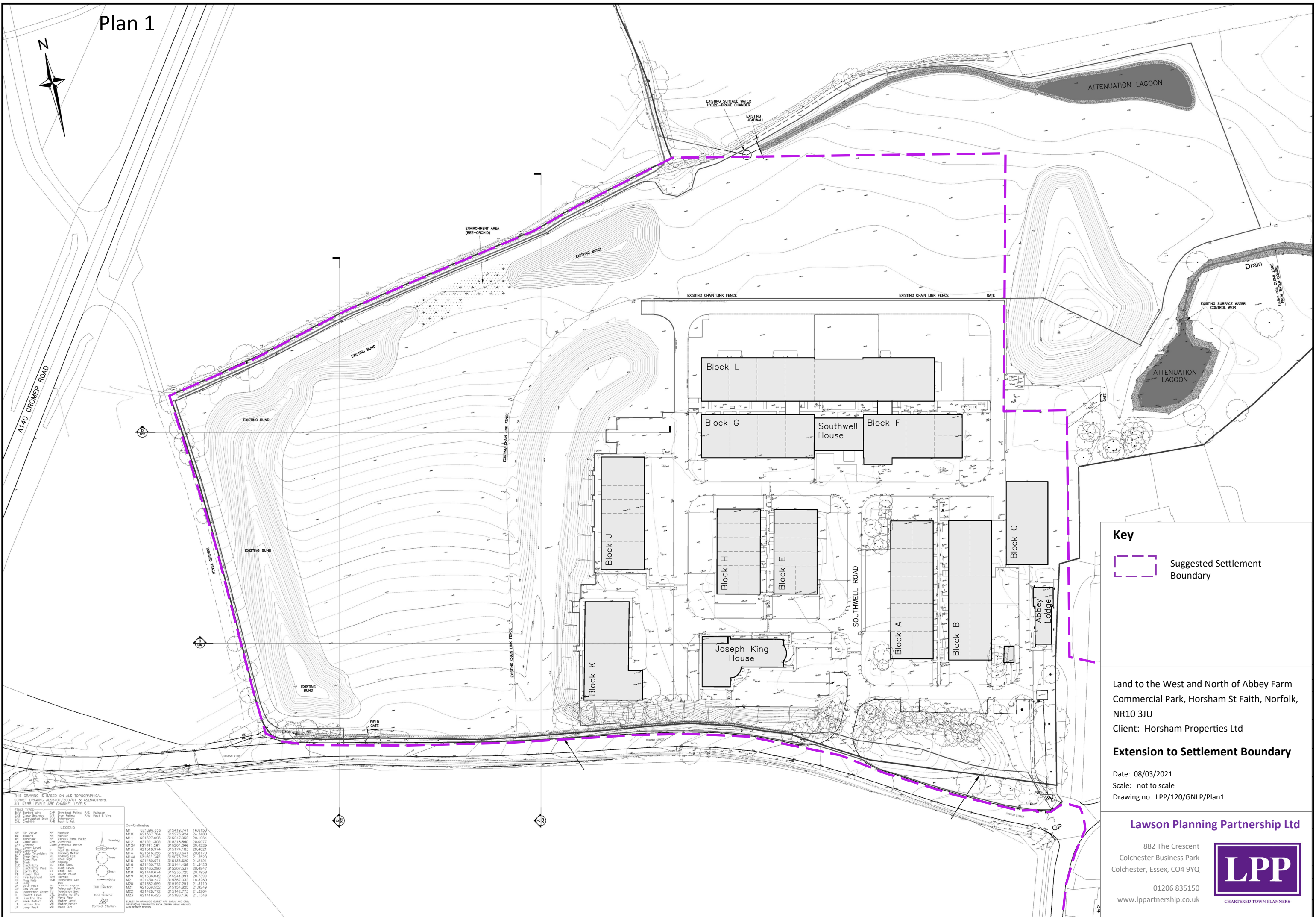
We trust that you will find these representations of assistance and will take them into account as part of the Local Plan process. If you have any queries or require further clarification, please contact us. Please can you also acknowledge receipt of these representations.

Yours sincerely


**Michael Pingram**  
**Lawson Planning Partnership Ltd**



# Plan 1



**Key**

 Suggested Settlement Boundary

Land to the West and North of Abbey Farm  
 Commercial Park, Horsham St Faith, Norfolk,  
 NR10 3JU  
 Client: Horsham Properties Ltd

**Extension to Settlement Boundary**

Date: 08/03/2021  
 Scale: not to scale  
 Drawing no. LPP/120/GNLP/Plan1

**Lawson Planning Partnership Ltd**

882 The Crescent  
 Colchester Business Park  
 Colchester, Essex, CO4 9YQ

01206 835150  
 www.lppartnership.co.uk



CHARTERED TOWN PLANNERS

THIS DRAWING IS BASED ON ALS TOPOGRAPHICAL SURVEY DRAWING ALS401/200/01 & ALS401rev. ALL FENCE LEVELS ARE CHANNEL LEVELS.

**FENCE TYPES**

SW	Barbed Wire	CP	Direct Piling	P/S	Palisade
CB	Close Boarded	LP	Lean Post	PP	Post & Rail
CC	Chain Link	FR	Formwork	PP	Post & Rail
CC	Chain Link	FR	Formwork	PP	Post & Rail

**LEGEND**

M1	621396.856	315419.741	16.8150
M10	621567.784	315273.924	24.3480
M11	621537.085	315247.052	20.1064
M12	621521.325	315218.860	20.0277
M13	621499.241	315204.266	20.4329
M14	621518.974	315174.183	20.4821
M15	621519.556	315150.641	20.8170
M16	621503.342	315075.722	21.3520
M17	621483.971	315135.659	21.2121
M18	621450.772	315144.459	21.3423
M19	621463.990	315207.837	20.4947
M20	621448.674	315235.725	20.3958
M21	621386.042	315241.081	20.3399
M22	621430.247	315347.032	18.3260
M23	621302.894	315197.391	21.1119
M24	621369.552	315154.825	21.9249
M25	621428.772	315142.773	21.2024
M26	621416.425	315166.136	21.1346

**SYMBOLS**

SW	Barbed Wire	CP	Direct Piling	P/S	Palisade
CB	Close Boarded	LP	Lean Post	PP	Post & Rail
CC	Chain Link	FR	Formwork	PP	Post & Rail
CC	Chain Link	FR	Formwork	PP	Post & Rail

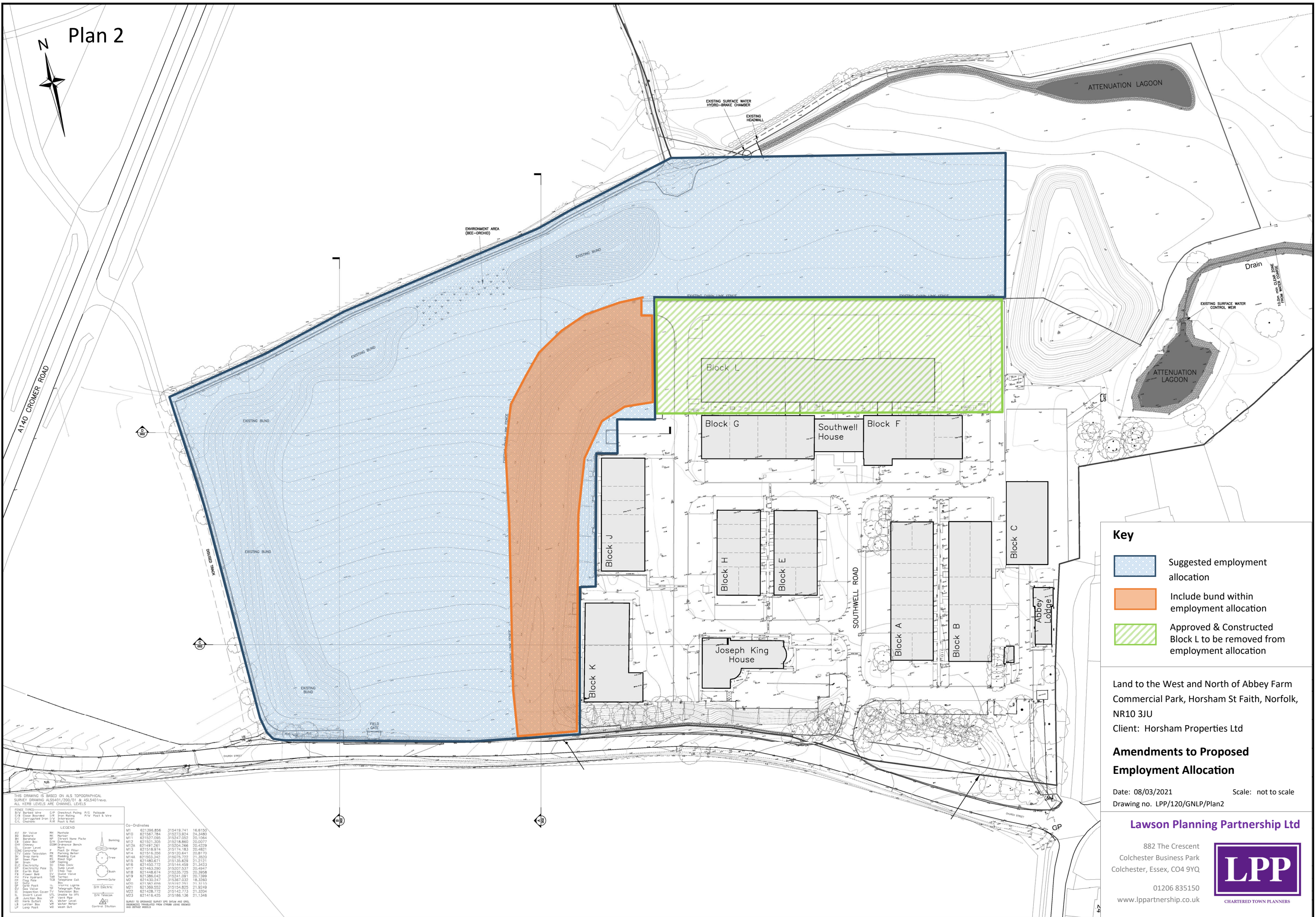
**SYMBOLS**

SW	Barbed Wire	CP	Direct Piling	P/S	Palisade
CB	Close Boarded	LP	Lean Post	PP	Post & Rail
CC	Chain Link	FR	Formwork	PP	Post & Rail
CC	Chain Link	FR	Formwork	PP	Post & Rail

**SYMBOLS**

SW	Barbed Wire	CP	Direct Piling	P/S	Palisade
CB	Close Boarded	LP	Lean Post	PP	Post & Rail
CC	Chain Link	FR	Formwork	PP	Post & Rail
CC	Chain Link	FR	Formwork	PP	Post & Rail





**Key**

- Suggested employment allocation
- Include bund within employment allocation
- Approved & Constructed Block L to be removed from employment allocation

Land to the West and North of Abbey Farm  
 Commercial Park, Horsham St Faith, Norfolk,  
 NR10 3JU  
 Client: Horsham Properties Ltd

**Amendments to Proposed  
 Employment Allocation**

Date: 08/03/2021 Scale: not to scale  
 Drawing no. LPP/120/GNLP/Plan2

**Lawson Planning Partnership Ltd**

882 The Crescent  
 Colchester Business Park  
 Colchester, Essex, CO4 9YQ

01206 835150  
 www.lppartnership.co.uk

CHARTERED TOWN PLANNERS

THIS DRAWING IS BASED ON ALS TOPOGRAPHICAL SURVEY DRAWING ALS401/200/01 & ALS5401rev. ALL HEIGHT LEVELS ARE CHANNEL LEVELS

**SYMBOLS**

BL	Buried Valve	CP	Direct Piling	P/S	Passive
CB	Close Bottom	CP	Draw Ring	PP	Post & Vire
CC	Close Cover	CP	Draw Ring	PP	Post & Vire
CC	Close Cover	CP	Draw Ring	PP	Post & Vire

**LEGEND**

M1	621396.856	315419.741	16.8150
M10	621567.784	315273.824	24.3480
M11	621537.085	315247.052	20.1064
M12	621521.325	315218.860	20.0277
M13	621499.241	315204.266	20.4329
M14	621518.974	315174.183	20.4821
M15	621516.556	315150.641	20.8170
M16	621503.342	315075.722	21.3520
M17	621483.571	315135.659	21.2123
M18	621450.772	315144.459	21.3423
M19	621463.990	315207.537	20.4947
M20	621448.674	315235.725	20.3958
M21	621386.042	315241.051	20.7399
M22	621430.247	315367.032	18.3260
M23	621307.894	315177.741	21.1119
M24	621369.552	315154.825	21.9249
M25	621426.772	315142.773	21.2024
M26	621416.425	315166.136	21.1346

**SYMBOLS**

BL	Buried Valve	CP	Direct Piling	P/S	Passive
CB	Close Bottom	CP	Draw Ring	PP	Post & Vire
CC	Close Cover	CP	Draw Ring	PP	Post & Vire
CC	Close Cover	CP	Draw Ring	PP	Post & Vire