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Date: 22nd March 2021

Greater Norwich Local Plan
Regulation 19 Submission Consultation
Sent via email to: GNLP@norfolk.gov.uk

Our ref: 2052/HAR2

Dear Sir / Madam,

Re: Re: Greater Norwich Local Plan, Regulation 19 Publication Consultation, March 2021

Site GNLP3047: Land at Harford, between the A140 and B1113, Keswick (approx. 15 ha) - Allocation for employment use

This submission is made in respect of Land at Harford, between the A140 and B1113 (Ref: GNLP3047) on behalf of Norwich Apex Limited. The site extends to 15.4 hectares and is being promoted for a mix of E(g) (formerly B1), B2 and B8 uses (see location and site plan; and emerging Concept Masterplan in **Appendix 1** attached).

The site has been identified in the previous version of the emerging local plan (Reg 18 - January 2020) as a non-residential 'Unreasonable Site'. The document stated:

"This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment sites in the new local plan. This area is outside the planning application boundary for the extended KES2 allocation in the South Norfolk Local Plan."

As a result, the site has not been taken forward as an allocated site in the latest Regulation 19 Submission Draft version of the local plan.

Lanpro acts on behalf Norwich Apex who own land immediately to the north of the subject land (now referred to as Apex Business Park). Norwich Apex secured planning permission for Apex Business Park in 2018 from South Norfolk Council (2017/2794) and which includes allocation KES2 from the adopted South Norfolk Local plan and some additional land. KES2 and the additional land (GNLP0497) which 2017/2794 encompasses, are proposed to be allocated in the GNLP, which we support.

Norwich Apex have agreed the first two land deals on the site subject of 2017/2794. The first deal is the sale of a 15,000 sq ft B2 building which is for a new company to the area. It will manufacture and create 40 jobs once up to full capacity. The second deal is the lease of a 15,000 sq ft B8 unit.

More broadly, a reserved matters planning application (reference: 2020/0903) in respect of 2017/2794, is currently under consideration by South Norfolk Council and various condition discharge applications have been approved and submitted. Access and the link road relating to KES2, were approved under the outline (this matter was not reserved) and a condition discharge application is currently with South Norfolk Council in respect of off-site highways works. In addition, strategic landscaping and surface water drainage proposals are also currently being considered under the reserved matters application and a condition discharge application.

Clearly, Norwich Apex are progressing the assembly of the infrastructure associated with KES2 2017/2794 and there is strong interest in the site, evidenced by the agent who has confirmed they have 11 live enquiries for the site. As such, this will clearly create an appropriate location for further employment land to be delivered in the vicinity. Norwich Apex submit that there is an opportunity and a need, to allocate the land subject of this representation, for further employment use.

We submit that the site should be allocated in the plan for the following reasons:

- The subject site has the potential to bring forward up to 15.4 hectares of employment land across a mix of E(g) (formerly B1), B2 and B8 uses. There are few employment allocations / options on the south side of Norwich. This land can provide a valuable contribute to the supply of employment land in the Greater Norwich area. As well as the immediate context (i.e. the existence of KES2 and 2017/2794), the site's location is preferable, as it benefits from close connection to the A140, A47 and A11, the latter which forms the spine of the Norwich Cambridge Tech Corridor. Allocation of the site would support the wider economic strategy for Greater Norwich and uses associated within the tech corridor, but not does not compete with it.
- Market demand for employment land in this location is apparent, as noted above and additional interest is currently being registered for employment space at Norwich Apex, with an estimated 70% of the masterplanned floor area subject to formalised deals or progressed discussions (and this is prior to commencement onsite). Much of the interest has been from "outside" operators interested in the area. It is our view that without the availability of land at this location (KES2/GNLP0497/ GNLP3047), these operators would not be attracted to Norwich.
- Many of the long-established existing allocations in the Greater Norwich Joint Core Strategy, to be 'rolled-over' into the GNLP, either don't seem in to be in demand, may require upfront infrastructure investment, are not in developers hands, or not in the right location. In addition, freehold options within many of the long-established allocations are rarely available. Greater Norwich needs new allocations in the right place and available on the right terms, otherwise job targets cannot be met.
- We note that the employment growth target is stated in the GNLP Strategy Document as 33,000 jobs for the plan period. The 2018 Regulation 18 Growth Strategy suggested a target of 45,000 jobs for the new plan period based on the East of England Forecast Model (EEFM) and City Deal. The GVA Grimley Study 2017, which forms part of the evidence base to the plan, suggested 44,000 jobs would be required by the end of the plan period. The 33,000 figure therefore seems unambitious in the context of the Vision set out for the Cambridge Norwich Tech Corridor and the number of jobs previously delivered in the 7 years to 2018. We also consider that the portfolio of allocated employment land within the emerging plan, has limited flexibility and diversity, and may have infrastructure constraints to delivery, or have other environmental constraints to expansion.
- In respect of emerging *Policy 6 - The economy* in the Reg 19 plan, it is notable that there is very little new land being allocated within the strategic employment sites with a lot of the older sites 'rolled over' into the employment land supply. In combination,



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KES/GNLP0497 and GNLP3047 would amount to circa 27 hectares of employment land in a sustainable location, adjacent to Harford Park and Ride, with good access to the highway network, but also proximate to Norwich centre (with associated and emerging sustainable transport links). Additionally, site specific infrastructure is coming forward. GNLP3047 provides the opportunity to contribute to delivering the employment objectives of the emerging GNLP and specifically Policy 6 and should be included in the plan.

In summary, GNLP3047 benefits from being located immediately adjacent to Norwich Apex Business Park, which is to be allocated under policy KES2/GNLP0497, and benefits from outline planning permission 2017/2794. Current interest and project development suggest this site will be built out quickly. The development of Norwich Apex will unlock the subject site, through the delivery of key infrastructure. This is of particular importance as many of the strategic employment sites already allocated in Greater Norwich are struggling from an Infrastructure deficit.

We therefore conclude that in respect of GNLP3047, the emerging plan is unsound, and should be amended to include the allocation of this land.

For the purpose of completeness, we include our previous representations submitted in respect of the site in 2020 (GNLP Reg 18 – see **Appendix 1**).

Yours sincerely,

Ian Douglass
Head of Planning

cc. Craig Knights, Norwich Apex

Enc.



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Appendix 1. Previous representations in respect of GNLP3047 submitted March 2020