

Sent by email: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Date: 22/03/2021

Our Ref: WR7376/57

Dear Sirs,

**Re: Representations Greater Norwich Local Plan Regulation 19 Publication Consultation**

On behalf of our client, FCC Environment Ltd (FCC), we are writing to make representations in response to the Greater Norwich Local Plan (GNLP) Regulation 19 Publication Consultation in respect of FCC's landholding at Pulham Market (GNLP2128) which is being promoted for a small-scale employment / commercial development.

FCC's Pulham Market site covers an overall area of c.1.92ha located strategically to the west of Pulham Market village and to the south of Long Stratton. The site's eastern boundary borders the A140 and the sites northern boundary borders the B1134. The A140 / B1134 roundabout is located to the north-east of the site, connecting the site to the surrounding rural communities and providing excellent access. The site was a former waste transfer and recycling centre leaving an underutilised previously developed and disturbed land available for sustainable development.



Site Location Plan

The NPPF supports the sustainable growth of the rural economy and acknowledges in paragraph 84 that sites with specific locational requirements may have to be located beyond existing settlements. FCC's Pulham Market site provides the perfect opportunity to re-develop a strategically located sustainable brownfield site for use that will generate economic benefits for the local area in accordance with the NPPF. The proposal would provide local employment opportunities and serve local needs by providing an enhanced services / retail offer to the surrounding local rural communities.

These representations follow on from FCC's previous representations to the Regulation 18 Consultation in relation to comments on the Pulham Market Site Assessment. Even though site GNLP2128 has not been allocated within the GNLP Pre-Submission Draft, FCC maintain the comments made during the Regulation 18 Consultation that the redevelopment of this site is viable/achievable with sufficient market demand and would provide an opportunity to redevelop a redundant brownfield site. The response to FCC's Regulation 18 representations was the following "*...the view remains that the site is better dealt with through the planning application process as there is no identified need to allocate any additional large scale employment sites in the Greater Norwich Local Plan. Evidence shows that currently committed land is more than sufficient in quantity and quality to meet the employment needs in Greater Norwich*". The emerging policies set out in the Pre-Submission Document do not reference development outside settlement limits, within the countryside, and therefore the plan is not considered to be consistent with national planning policy and not sound. FCC consider that the GNLP should go further with its strategy to strengthen its commitment to boosting the rural economy.

#### ***Vision for Greater Norwich in 2038***

FCC supports the statement in paragraph 127 of the Pre-Submission Draft Strategy that "*Generating the right levels of growth in the right places will help our local economy by stimulating economic investment, new infrastructure, new technologies and environmental improvements. This will improve access across Greater Norwich to services and jobs, and lead to better environmental quality*". The vision states that most job growth is expected to be delivered on key strategic sites in and around Norwich. Paragraph 131 goes on to state that "*the role of smaller scale employment sites elsewhere in the urban area, market towns and villages will help to deliver good access to jobs for all*". However, it is noted that there is no reference in the vision, or policies, to the rural economy outside settlement boundaries and within the countryside. FCC consider this not to be consistent with the NPPF and the Local Plan needs to consider the vitality and economy of rural areas needed for rural communities to boost rural economic growth. The Vision should be strengthened to include the importance of the rural economy within the countryside.

Paragraph 148 of the vision states that "*development will make efficient use of brownfield sites and minimise the loss of greenfield land*". FCC considers that this statement should be strengthened to add that development will make efficient use of brownfield sites within both urban and rural areas. The NPPF encourages the effective use of land by reusing all brownfield land.

#### ***Economy Objective***

The Plans objective for economy states that "*to support and promote clean growth and progress towards a post-carbon economy through the expansion of internationally important knowledge-based industries in the Cambridge Norwich Tech Corridor as part of a wider entrepreneurial, enterprising, creative and broad-based economy with high productivity and a skilled workforce*" (page 38). FCC consider that the objective for economy should reference the importance of the rural economy and the support for the vitality of rural communities.

#### ***Delivery Statement***

The Delivery Statement presented on page 40 of the Pre-Submission Draft Strategy is not a policy but does set

out how the GNLP addresses two key issues; the delivery of growth and addressing climate change. Regarding economic development, the Delivery Statement states that the plan provides choice and flexibility with a wide range of type and sizes of employment sites. FCC supports the inclusion of the following statement that *“smaller scale and rural employment sites are less likely to be constrained by infrastructure requirements and will be supported in accessible and sustainable locations”*. However, it is considered that the plan doesn't go far enough in supporting the rural economy with no reference to employment development within the countryside where a rural location outside settlement boundaries can be justified. This is explored further within comments on Policies 1, 6 and 7.4 below.

### ***Climate Change Statement***

The Climate Change Statement presented on page 42 sets out how the GNLP will address climate change. One of the measures presented is requiring the location and design of development to ... reduce the need to travel, particularly by private car. The great majority of development allocations is in urban areas and large villages. The statement states that growth in villages is located where there is good access to services to support their retention. The distribution of the great majority of growth thus reduces the need to travel. Although FCC supports this in principle, it is considered that the GNLP should be flexible and consider certain developments which require to be located in rural locations away from urban areas or development in rural locations where communities are dependent on the private car. Such proposals can incorporate sustainable initiatives and consider climate change impacts within their design.

### ***Policy 1 The Sustainable Growth Strategy***

Policy 1 sets out the broad strategic approach for growth. FCC supports paragraph 15 of the Pre-Submission Draft Strategy that *“our ambitions for delivering sustainable growth through the GNLP must reflect the Government's requirements for local plans set out in the NPPF”*. The settlement hierarchy presented in policy 1 includes village clusters which covers all other settlement areas outside the key service centres. FCC consider that the countryside should be identified on the settlement hierarchy enabling the growth of the rural economy.

It is noted that paragraph 169 of the Pre-Submission Draft Strategy states that the total amount of allocated and permitted employment land in 2018 is more than enough to provide for expected and promoted growth. Therefore, it is understood that a large number of employment allocations have been brought forward from current adopted plans and that the GNLP does not make significant additional allocations of employment land beyond those already identified. A detailed review of the employment figures and allocations has not been undertaken; however, FCC consider that the reassessment of all undeveloped allocated sites should be undertaken to determine whether they are likely to be developed by the end of the GNLP period. If a site is no longer considered to be deliverable, it should be de-allocated and replaced by an alternative allocation. Policies also need to remain flexible enough for any new sites to be considered acceptable over and above allocated sites.

Paragraph 161 of the Pre-Submission Draft Strategy states that the GNLP takes a flexible approach. FCC consider that the plan could go further with the need for some flexibility to be contained within spatial employment growth to reflect changes in the demand for land. This is in line with paragraph 120 of the NPPF which states that *“planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans and of land availability...”*.

Policy 1 states that smaller scale employment sites are allocated, and additional windfall sites will be provided in urban areas, towns and large villages providing local job opportunities and a vibrant rural economy. FCC consider that to be consistent with the NPPF, the GNLP needs to go further in supporting development in the countryside where there is a justified locational need. Paragraph 82 of the NPPF states that *“planning policies and decisions*

*should recognise and address the specific locational requirements of different sectors*". The policy should be amended to provide greater flexibility in relation to rural areas, not limiting development to within village settlements if that development can demonstrate that it would enhance the vitality and viability of the local community and services; the policy should enable the impacts of such a scheme to be weighed against any benefits.

Paragraph 188 of the Pre-Submission Draft Strategy states that the strategy for the location of growth is to maximise brownfield development and regeneration opportunities, which are mainly in Norwich. FCC considers that this should be strengthened to maximise brownfield land within rural areas too. The NPPF encourages the effective use of land by reusing all brownfield land.

#### ***Policy 6 The Economy (Including Retail)***

Paragraph 285 of the Pre-Submission Draft Strategy Documents states that *"this local plan aims to deliver inclusive economic growth ... in a time of significant economic uncertainty and change, the policies aim to provide an appropriate balance between certainty and flexibility to inform investment decisions and encourage economic development"*.

FCC supports the following paragraph 70 of the Pre-Submission Draft Strategy Document that *"rural enterprises are important to the local economy. The proportion of micro-businesses employing up to nine people is above the national average in Broadland and South Norfolk. Signs are that new and small businesses can flourish and the survival rate of newly established enterprises is good"*. Paragraph 71 goes on to state that the GNLP should support the growth of a wide ranging and changing economy, including smaller rural enterprises.

It is noted that Policy 6 does not reference small scale employment development within the countryside, outside settlement boundaries. This is questioned given numerous evidence base documents highlights the importance of the rural economy including the Employment Land Assessment Addendum 2020 which highlights the rural economy as an opportunity to rebalance the local economy internally. This approach differs from the adopted South Norfolk Joint Core Strategy which supports small to medium scale commercial enterprises within the countryside where a rural location can be justified. To exclude land from development purely because it lies outside of a settlement boundary would place unnecessary limits on the most effective use of land and potential delivery of sustainable development. A less restrictive approach, whereby the merits of each case is considered individually, would support greater enhancement of the rural economy. The policy should include the benefits that the scheme would generate for the rural economy to be considered and weighed against any impacts.

Services including petrol filling stations are key infrastructure requirements for economic growth, especially in rural locations where communities are dependent on the private car. The GNLP should be worded in such a manner that further infrastructure requirements in rural areas can be provided for, enabling the rural economy to be boosted.

#### ***Policy 7.4 Strategy for the Areas of Growth – Village Clusters***

Policy 7.4 outlines the strategy for areas of growth within village clusters and highlights that there will be 2.3ha of new employment allocations within this settlement hierarchy tier. The policy states that *"other small-scale employment development will be acceptable in principle elsewhere within village development boundaries, through the re-use of rural buildings or through the potential expansion of existing small and medium sized employment sites, subject to meeting other policies in the development plan"*.

FCC consider this is overly restrictive and may restrict future economic development in rural areas. For Policy 7.4 to be consistent with national policy, small-scale employment development should also be acceptable in principle within the countryside where a rural location outside settlement boundaries can be justified. For example, refuelling

stations having a functional need to be located off strategic roads which are normally outside settlement boundaries, such as FCC's Pulham Market site proposals. Paragraph 84 states that *"planning policies and decisions should recognise that sites to meet local businesses 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...The use of previously developed land...should be encouraged where suitable opportunities exist"*.

It is noted that there are no policies within the GNLP for employment development within the countryside, FCC consider a criteria-based policy allowing windfall developments in the countryside should be included within the GNLP which will provide flexibility in relation to varying locational requirements. Given the Greater Norwich area is predominately rural in nature, in particular South Norfolk in which FCC's Pulham Market landholding is situated, FCC consider that the GNLP should go further with its strategy to strengthen its commitment to boosting the rural economy. The Broadland and South Norfolk Our Plan 2020 – 2024 identifies to grow the economy as an objective including supporting all sizes and types of businesses. It is acknowledged that we are in a period of significant uncertainty and therefore Local Plan Policies need to be flexible to enable change and worded in a positive manner to proactively encourage the rural economy.

We would be grateful if you could confirm receipt of these representations. If you have any queries, please do not hesitate to contact me.

Yours faithfully,

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For and on behalf of Sirius Planning Ltd