

Public Participation Statement for the Draft Food and Agriculture Hub

(April 2014)

Public Participation Statement for the Draft Food and Agriculture Hub. Supplementary Planning Document.

Regulation 12 (a) Town and Country Planning (Local Planning) (England) Regulations 2012

April 2014

1. Introduction,

This Public Participation Statement sets out how South Norfolk Council and Broadland District Council have engaged and consulted with the public on the Food Hub Supplementary Planning Document (SPD) in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and the adopted Statements of Community Involvement (SCI)

This Statement sets out the background to the SPD and the evidence used for in developing the 2013 draft.

Following preparation of the draft SPD, this Statement also summarises the comments made during the statutory public consultation (October to December 2013), plus subsequent supporting information received in respect of one particular proposals, after the consultation period.

2. Purpose of the SPD

The principle of developing a Food Hub has been set in the adopted Joint Core Strategy (JCS). JCS Policy 5 (The Economy) refers to the development of a flagship food and farming hub serving the needs of Norfolk. The supporting text of the policy notes that this would allow local produces to “co-ordinate activity and access larger markets”, provide a focus for ancillary supporting business and suppliers, and an opportunity for the relocation of the livestock market from its current site within Norwich.

This SPD provides further detail on the main criteria for assessing any proposals, including the mix of uses, locational criteria and the expected scale of proposals.

3. Pre-production background

In 2006 a feasibility study was undertaken on behalf of Shaping Norfolk's Future into the prospects for a Food Hub. The study identified a possible range of supportive enterprises, both infrastructure and knowledge based, which are needed to help achieve “a step change in the scale of the potential market for local producers”. As such the study supported the concept of a cluster of users that could be located in the Norwich area, utilising proximity to existing research and educational establishments.

The need for a food and farming hub serving the needs of Norfolk was identified in the JCS and reflected in Policy 5 and the supporting text. The concept was to allow “local producers to co-ordinate activity and access larger markets, provide a focus for ancillary supporting businesses and suppliers, as well as having the potential to relocate Norwich Livestock Market.

During 2011/12 proposals for a food hub at Honingham/Easton were put forward as part of the process of developing the South Norfolk Site Specific Allocations and Policies document. Because the proposals straddled the district boundary, included a range of uses that the Council did not consider appropriate for a food hub and was of a scale beyond what was envisaged as a hub for *local* producers, the decision was taken by South Norfolk Council not to support allocation of the site.

In 2012 the Government consulted on “Shaping a UK Strategy for Agri-tech” (BIS, October 2012), which highlighted the need to support innovation which builds on the scientific research and development in food and life sciences. Food and life sciences are strongly represented in the Norwich area, specifically at the Norwich Research Park. Consequently the SPD seeks to include the facilitation of agri-tech uses as part of the food and agriculture hub. In July 2013 the Government published the ‘UK Strategy for Agricultural Technologies’.

In September 2013 Norfolk County Council published the Norfolk Rural Development Strategy. This sets out the strategy for the future economic growth of the rural area. The long-term focus is on four key areas, including “Agriculture and the food chain” such as adding value to food by processing and marketing; creating new technology to increase agricultural productivity. In addition, “more food processing would add value to Norfolk farm output & create high value jobs, particularly if linked to improved logistics and marketing through a Norfolk Food Hub”; and “developing a Norfolk Food Hub to add value to Norfolk’s food and farming sector as the demand for provenance increases strongly in food markets”. Consequently, an identified priority is:

“Food Hub - the proposed Norfolk Food Hub could add significant value to the Norfolk agri-food chain through its focus on adding value to Norfolk production, improving logistics and providing a shop window to promote Norfolk food and drink nationally “.

More recently, in January 2014, the New Anglia Local Economic Partnership published its draft Strategic Economic Plan which contains similar objectives to the Norfolk Rural Development Strategy, including the proposed Food Hub.

4. Consultation on the Draft SPD

The draft SPD was approved by South Norfolk Cabinet for consultation on 7 May 2013 by and the 20 March 2013 Place Shaping Committee at Broadland District Council.

The representation period took place between Friday 11 October and 5pm, Monday 9th December 2013. The Consultation invited comments from a broad mix of people including: those on the council's database, comprising the specific and general consultation bodies (including town and parish councils), as identified in the SCIs, as well as a range of planning and land agents who have promoted larger scale sites to the two authorities, and other bodies representing the food and agriculture sectors.

The consultation was also published on the published on both South Norfolk Council's website and Broadland Council's website.

Methods of communication

Communication method	Description
E mails and letters	Letters (sent as an e-mail attachment where possible) to: all statutory (specific) consultees; a wide range of planning and land agents; specialist interest bodies (e.g. National Farmers Union, Royal Norfolk Agricultural Association, Country Land and Business Association, Federation of Small Businesses, Norfolk Chamber of Commerce and the Local Enterprise Partnership); and all elected members and parish and town councils across the two districts
Website	All consultation information was displayed on dedicated pages of the South Norfolk Council and Broadland Council websites.
Talking to Officers	Officers were available to deal with enquiries in person or over the phone during normal working hours, with specific contact details included in the consultation letter and on the website.

5. How many representatives were received?

During the 8 Weeks consultation, responses were received from 25 individuals and organisations. 7 of which were specific consultation bodies and 18 from general consultation bodies and landowners.

Of the 25 consultation responses received:

- 15 supported the concept of the Food Hub and the SPD; however, of these many sought amendments and 2 strongly objected to the "current wording" of the SPD;
- 9 neither support or object
- 1 objects outright.

A further 17 letters of support from local businesses and endorsements from potential end users and interested parties were submitted by the proposers of the Honingham/Easton site in support of their representations. These were supplemented by a further 12 letters received after the consultation period.

6. Summary of the main issues raised during the consultation

The overarching general comment was one of strong support for the concept of the SPD and Food and Farming Hub with many respondents qualifying support with some specific wording changes. Below is a short summary of the main issues raised, full summary list of consultation responses is contained in Appendix 1

6.1. Support for the SPD

The vast majority of respondents supported the concept and the benefits a food hub could bring to the regional economy and agricultural sector; however most suggested amendments in a number of areas, to allow greater flexibility. Most responses were general in nature, covering similar points of support. The notable exception was the detailed submission provided by Lanpro on behalf of Honingham Thorpe Farms, who provided detailed consideration and justifications for suggested changes to the SPD. Previously Honingham Thorpe Farms have proposed a specific scheme for a Food Hub, extending from their existing business units towards Easton village. Whilst the information relating to this proposal was provided as part of the support for their representation, the majority of their response dealt with general principles of scale.

6.2. Consideration of Scale

A significant number of representors (particularly Lanpro/Honingham Thorpe Farms and those supporting their position) questioned the need for the size threshold/restriction of 10ha for a first phase of the Food Hub. The reasons put forward varied but were all around the same theme of allowing economic growth, through market forces and included:

- The size should depend on the viability and the provision of a comprehensive and sustainable development which supports efficiency and does not undermine the projects viability;
- The threshold is unrelated to known market;
- Should be scope to develop in an integrated way, unconstrained at a scale to allow for market certainty;
- Allow uses room for expansion;
- Concerns that large scale business may not locate there if the land supply was constrained through policy

Other general comments thought that scale should be appropriate, sustainable and consistent with local dynamics.

6.3. Clarification of vision

Some representors mainly from Town and Parish councils, as well as one neighbouring planning authority thought the SPD was vague, lacked ambition and needed to give a further steer on suitable locations and or criteria used for guiding/selecting a suitable site. The wider market demands and growth

trends should be recognised in the vision along with “precise” definitions for *large scale food manufacturing / processing*.

6.4. Appropriate Use / mix of uses

The majority supported the concept but raised concerns regarding the intended mix of uses. A strong business case (theme) was put forward by many representors of the food and agricultural industries as well as individual companies for a greater flexibility in uses. The SPD should promote uses to reflect growth sectors and added value sectors and demonstrate more flexibility in the prescribed uses. There were a number of suggestions put forward:

- a) That the SPD should not be prescriptive and there should be no distinctions between primary and ancillary uses. Flexibility must be applied to allow the most efficient growth to maximise jobs.
- b) There should be a focus on higher value activities with integration of other uses such as education. The issue is that much of Norfolk’s agricultural produce is “exported” and added value is lost to another region was put forward for justification that the permitted uses should include increased food processing facilities along with research and development opportunities and supportive logistics.
- c) That the SPD should reflect market demand and economic growth opportunities and be market focused, maximising / retaining value in the Norfolk economy and job creation at the same time as promoting Norfolk’s Food and Drink industry through retail outlets , research and development and educational opportunities.

A re-occurring theme in the representations by the major promoters of a potential food hub was that it is essential that the Food Hub SPD promotes added value agri-food business alongside associated logistics and wholesaling to gain economies of scale and retain “added value” in Norfolk while capitalising on the current and future growth in the food processing sectors. Primary uses should be amended to reflect food processing and associated logistics, wholesaling and educational potential. Secondary uses should be to encourage agricultural support industry including agricultural equipment, machinery, veterinary services and offices to support the primary functions.

6.5. Transport

Some respondents raised the issue of impact of development on junction capacity while others linked impacts to the cumulative effects of growth and wider cross boundary network impacts. Others noted that the location should be on major transport routes and that the location should build on and reflect existing highway improvement priorities. Some expressed a preference for links to the A47, others the A140/ A11 adding a regional dimension to the location.

7. How have the main issues of members of the public been addressed in the emerging SPD ?

The following table lists the suggested changes in response to the four main areas in 6.2 to 6.5.

Summary of Issue	How the main issue are addressed
Consideration of Scale	The JCS does not set a specific scale for the food hub, and the precise size would be dependent on a number of factors (such as infrastructure capacity, characteristics of the area, proposed mix of uses, market demands and viability). Consequently, it is accepted that the SPD should not suggest a limit to the scale of a food hub development. A specific proposal would need to be fully justified as acceptable through the planning application process. Proposals should be based on an overall masterplan demonstrating how identified needs will be met. Given the difficulty of predicting future needs in the long-term, it is expected that a development will be done in phases with the scale and uses in each phase reflecting the identified needs at that time, but having regard to the need to make provision for necessary infrastructure and give flexibility for a development. An indicative scale for an initial phase of up to 10 ha is suggested.
Clarification of vision	The overarching policy is set out in the JCS, including supporting text that explains the role of the food hub; this is included in the SPD in Appendix 1. It is not the role of the SPD to redefine this.
Appropriate Use / mix of uses	Whilst the JCS is not specific about the uses that might be included as part of a food hub, the hub is identified separately from the strategic employment allocations in the NPA precisely because it is intended to fulfil a particular role. As such, the range of uses needs to be limited to agriculture and food, but allowing for the various elements of the industry. In this respect, consideration needs to be given to the importance of “adding value” to the agricultural produce, as identified in the economic strategies. Also, the case is strongly put forward that the market demand is for locations where a greater variety of functions can be accommodated within one site.

	Consequently, the list of primary uses is extended to include agri-tech, processing of agricultural produce and manufacture of food products.
Transport	The SPD is deliberately not specific about the potential location of a Food Hub, but instead sets out a range of criteria. One of those criteria is good access to the main road network, and the document specifies those routes most likely to be suitable. Existing development sites, including new allocations to meet the JCS requirements will need to be taken into account when assessing the implications of a Food Hub proposal.
Other	A number of other suggestions for amendments were considered, including mentioning the Minerals and Waste Core Strategy, highway improvements outside the district, and climate change, but these are not seen as necessary or appropriate for inclusion in the SPD, other than a minor factual change to insert “existing” before “food and agricultural sector” in final sentence of 3.1(1).

Appendix 1

Food and Agricultural Hub SPD Consultation Summary

Organisation	Who	S/ O	Comment	Council Comment	Actions
Salhouse Farms	Henry Cator	S	Dated 17 th December 2013 received 23 December 2014 Supports Ian Alston application re Honingham - Job growth - Reconnect public with Norfolk food production - Logical step building on Norwich Research Park / UEA and Cambridge University 30 hectares will soon reach full potential	Support noted for food hub. The SPD is to guide decisions regarding a food hub and is non site specific.	No change
Natural England	Mr Jamie Robert Melvin	-	Dated 9 th December 2013 No comment. Further advice contact Jamie Melvin directly Jamie.melvin@naturalengland.org.uk	Noted	No change
Royal Norfolk Agricultural Association	Greg Smith - Chief exec	S	Dated 9 th December 2013 Supports in context of growing investment in knowledge and competitiveness with additional benefits to the UK – development of food and agricultural sector hubs have the potential to increase economic output (jobs & wealth creation) and reduce impact on the environment / resource. Planning policy can help support business and investment and the development of a cluster will deliver higher skills and leadership Specific comments: - SPD is NPPF compliant, however important to consider viability of any proposal and coherence with existing related developments - Location should reflect and build upon existing highway improvement priorities 10ha should not be used as a threshold. The size depends on viability and the provision of a comprehensive and sustainable development should be the principle	Support noted, and agree. Viability is a material consideration. It is acknowledged that as the SPD is not site specific there should not be a set a finite limit on the scale of development allowable. For a	At end of 3.1(2) delete “and will not be expected to exceed 10 Hectares”, Add Proposals should be based on an overall masterplan demonstrating how identified needs will be met. Given the difficulty of predicting future needs in the longterm, it is expected that a development will be

Organisation	Who	S/ 0	Comment	Council Comment	Actions
			objective. • Uses. – ○ the mix of business will depend on the location. ○ the SPD should not be prescriptive (more flexibility) ○ the mix should be based around the viability of core business and the wider benefits • Precise definition of “large –Scale” food manufacturing /processing would be a helpful addition.	specific proposal, the scale would depend on the identified needs and the appropriateness of the particular location The intention of the Food Hub is to support a cluster of uses. By its nature a “food hub” will incorporate a variety of agricultural / food related uses, which will be a variety of sizes. The appropriateness of a particular scale of use would depend on the need identified and whether it was appropriate in that location.	done in phases with the scale and uses in each phase reflecting the identified needs at that time, but having regard to the need to make provision for necessary infrastructure and give flexibility for a development. An indicative scale for an initial phase might be up to 10 ha.” delete “for large-scale food manufacture / processing or” from last sentence in 3.1
NFU	Rob Wise	S	Dated 9th December 2013 Norfolk has the largest agricultural sector of any county. Disproportionate added value to the food production as much is processed out of the county. Uses – increasing food processing facilities should be seen as a priority along with R & D and Logistics. Benefits • Take ownership of food chain – promote local products • Facilitate greater collaboration between farmers and food processing • Help establish local market and stability of prices • Showcase variety of agricultural foods Amendments: Increased flexibility of Uses (increase processing) suggests there	Support welcomed The intention of the Food Hub is to support a cluster of uses.	SPD must show flexibility to adapt to market. See changes proposed under Royal Norfolk Agricultural Association and Suffolk County Council.

Organisation	Who	S/ O	Comment	Council Comment	Actions
			should be no distinction between primary and ancillary uses. Flexibility must be applied to allow the most efficient growth to maximise jobs		
Suffolk County Council	James Cutting	S	Dated 9th January 2013 Development of a food hub is in line with Suffolk Growth Strategy and New Anglia LEP growth plan and is to be supported. Potential processing and manufacturing elements (3.1 (3)) are key to adding value for regional produce. Consider adding the potential for a regional dimension in 3.1 (1) by the inclusion of regional offer which would mean locations to the A140 / A11 could be considered preferable to A47.	The intention is to develop a hub serving the needs of Norfolk and agri – food sector in and around Greater Norwich. The SPD is non site specific. Its intention is to assist guiding interested parties and planning application on scale/ design, types of uses and locational issues. The comments on the key importance of processing and manufacturing elements noted.	Agri-tech, Processing and manufacturing (bullet points 2, 3 and 4 under the ancillary uses in 3.1) to be moved into the list of acceptable primary uses.
New Anglia LEP	Andy Wood Chairman	S	Dated 9th December 2013 The SPD is in line with the LEP's Strategic Economic Plan (SEP) and the Norfolk's Growth Plan. Model compliments existing approach of exemplar clusters at Hethal and NRP. Success is dependent on integrated food processing, logistics and marketing. Benefits include supply chain efficiency, and significant gains for the local economy. Global food demand is projected to grow by 50% by 2030- potential exist for significant added value and job growth should a strategic move along the supply chain be realised. Uses • Focus on high value activities • Integration of other users include education / pupil engagement Amend SPD to reflect wider market demands and growth trends in food market and the broader vision that will see Norfolk, SN and	Noted Alignment of Strategic Plans is beneficial for delivery and for setting priorities	See changes under Royal Norfolk Agricultural Association, NFU and Suffolk County Council above.

Organisation	Who	S/ O	Comment	Council Comment	Actions
			Broadland play a major and significant role in Governments Agri-Tech Strategy.		
Member of Public	Mr Raymond Roberts	O	Dated 5 th December 2013 – email Easton/ Honingham is not an appropriate location - • Countryside views • Already extra housing development at Easton • Existing employment at Longwater • Junction / infrastructure at capacity • Near to my house	The SPD is non site specific. Its intention is to assist guiding interested parties and planning application on scale/ design, types of uses and locational issues	No changes
Breckland Council	Janie Smith	-	Dated 4 th December 2013 Consider amending section 3 part 2 to address the potential for wider cross boundary highway/road network implications To avoid any misunderstanding consider defining “local” in the context of supports local food production.	3.1(2) bullet-point 3 refers to “any necessary improvements to the highway network”; this is not restricted to any particular district. JCS policy 5 states that the policy context is to “ <i>support the needs of Norfolk and Agri-food sector in and around Greater Norwich</i> ”	No change
The Country Land & Business Association	Claire Wright	S	Dated 28 th November 2013 Endorse correct approach for location to be close to Norwich and take full account of established transport links and educational / research opportunities. Support the scale and design as an appropriate balance of rural economic development and the protection of the landscape Users should be linked to development of food production and agriculture from Greater Norwich and wider region. Increase floor space for ancillary uses to 50% to ensure food agriculture hub presents greatest benefit to the rural economy.	Support noted The concept set out in JCS policy 5 is to “ <i>support the needs of Norfolk and Agri-food sector in and around Greater Norwich</i> ”	See changes under Royal Norfolk Agricultural Association, NFU and Suffolk County Council above
Environment agency	Mr Graham Steel	-	Dated 25 November 2013 Second bullets 3.1.2 add climate change is one of the biggest threats to the economy, environment and society. New development should therefore be designed with a view to improving resilience and adapting to the effects of climate change,	Noted. These issues are addressed in the lpa’s development plan documents and the National Planning Policy	No change

Organisation	Who	S/ 0	Comment	Council Comment	Actions
			particularly with regards to already stretched environmental resources and infrastructure such as water supply and treatment, water quality and waste disposal facilities. We also need to limit the contribution of new development to climate change and minimise the consumption of natural resources. Recommends measures are in line with Objectives of NPPF paragraphs 7, 93-108 pre assessment under Code/ BREEAM Consider resource efficiency through design Net gains for nature Minimise energy use through design Flood risk assessment and drainage strategy incorporating SUDS would be required. Advise joint working with LA/ EA and any applicant to ensure potential issues resolved.	Framework, and do not need repeating in the SPD.	
Waveney District Council	Julie Hood	-	Dated 25 November 2013 – e mail No concerns - no comments	Noted	No change
Costessey PC	Hilary Elias	-	Dated 21st November 2013 – email Any new development should not acerbate existing traffic difficulties. Should the Food Hub be developed at Easton/ A47 it should have easy access to north, south east and west and substantial Improvements undertaken at the Longwater junction and wider road network, including improved access from the north of Norwich and the development of the NDR.	The SPD is non site specific. Its intention is to assist guiding interested parties and planning application on scale/ design, types of uses and locational issues. Any application would have to be submitted with a transport assessment.	No change
Swannington with Alderford PC	Helen Mutimer	S	Dated 20th November 2013 Agri hub must not be reliant on the livestock market as the financial future is uncertain. Linked trips to local centres could be lost if livestock market was relocated. Access consideration and NDR development is essential Any location must take into consideration local housing	Noted The inclusion of the livestock market is just one possibility amongst a range of uses.	No change

Organisation	Who	S/ O	Comment	Council Comment	Actions
			developments along the A47 Consideration must be given to biosecurity of any livestock markets In principle a food agricultural hub will benefit regional agricultural business, farmer – potential to create a nationally recognised centre.		
Easton PC	John Witcombe	S	Dated 19 November 2013 Location should be relative to the A11 / A140 rather than A47 and the parish of Easton. Access considerations should include dedicated junctions Potential uses need to be streamlined to move towards quality rather than quantity. Consultation needs to be longer than 21 days.	Noted - The SPD is non site specific. Its intention is to assist guiding interested parties and planning application on scale/ design, types of uses and locational issues. The consultation ran for 8 weeks ending on 9th December 2013.	No change
Taverham PC	Sophie Cockburn	S	Dated 19 th November 2013 – email Supported in principle. However SPD was vague. Location of any site should be close to good rail, bus and road links and subject to an Environmental impact assessment Location towards Easton would add weight to the development of the NDR.	JCS Policy 5 refers to a flagship food and farming hub serving the needs of Norfolk, providing opportunities to co-ordinate activity & access larger markets, be a focus for supporting ancillary businesses /suppliers and the relocation of the livestock market. The SPD supplements this, giving guidance on location and type of uses for example, but it is not intended to be site specific. Other relevant planning policies would be taken into account, and an EIA would be required for a specific proposal if necessary.	No change
Norfolk County Council	Stephen Faulkner	S	Dated November 2013 Clarification / further explanation required para 2.1 on what is envisaged by a food and agricultural Hub. Inclusion of a vision statement may help.	The overarching policy is set out in the JCS, including supporting text that explains the role of the food hub; this is included in the SPD in	No change

Organisation	Who	S/ 0	Comment	Council Comment	Actions
			- Consider other large scale employment uses in addition to storage and distribution. As long as they are consistent with aims and objectives of JCS policy 5 and paragraph 5.42 - Clarification on whether the SPS covers fishing and aqua-culture – if so SPD must have regard to the adopted Marine Plan For clarification Paragraph 3.1 – final sentence should read ... <i>functional links with other elements of the existing food and agricultural sector.</i> <i>Paragraph 3.1 –section 2 bullet 2 consider adding “where there is any impact there will be a need for appropriate mitigation. The case for proceeding with the proposal, if it is not possible to mitigate the impact, will need to be made clear as part of the application, e.g. where there is an overriding national need”.</i> 3.1 (3) clarification over whether agriculture covers aqua-culture and or the commercial fishing sector 3.1 (3) clarification to indicate no more than approx. 10% of any single application/ proposal will be for subsidiary uses TRANSPORT In general the promoters of any application would have to demonstrate that the local transport networks are capable to cater for the impacts of specific proposals, and where the need is Identified, suitable improvements made. Such issues would be	Appendix 1. It is not the role of the SPD to redefine this. The SPD chapter three provides guidance to interested parties and planning application on scale/ design, types of uses and locational issues The SPD sets out the main considerations governing a “Food Hub” in Broadlands and South Norfolk. It is possible that fish products etc. might be included within “food products”. This would cause no conflicts with the Marine Plan. Agree The current wording of “minimising” environmental impacts incorporates the possibility of mitigation measures. Other planning policies on environmental protection etc. will also be taken into account in considering specific proposals Issue of subsidiary uses considered under other comments above noted	Add “existing” to para 3.1(1) No change See changes under NFU above

Organisation	Who	S/ O	Comment	Council Comment	Actions
			addressed through a Transport Impact Assessment, TIA. Members: have expressed concerns regarding access and traffic generation around the A47 and the impacts on local lanes, should such hub be located at Easton.		
Saxlinghaam Nethergate PC	Mrs Julie King	S	Dated 12 th November 2013 email Support the proposals contained in the SPD.	Support welcomed	No change
Broads Authority	Natalie Beal	S	Dated 8 th November 2013 In principle the SPD is supported, however more detail is required on suitable locations and these could be included. The Broads Authority welcome continued dialogue over potential sites.	Noted, The SPD is non site specific. Its intention is to assist guiding interested parties and planning application on scale/ design, types of uses and locational issues	No change
Highways Agency	Roger Chenery	S	Dated 7 th November 2013 - <u>email</u> Highways Agency operates and maintains the Strategic Road Network which means the A47 and A11 in the region. Should a proposal come forward the HA would seek to work with Norfolk CC with regard to the understanding of all transport issues. General comments Accept that a food hub by its very nature will need good transport links which central locations would find difficult to achieve. There is a need to balance the strategic role of the highway network and that of local business, and other local traffic generation which generate relatively short trip local traffic. Infrastructure improvements that address the requirements of growth in the region including the food hub and proposed residential growth may be significant; however this is in line with Circular 02/2013. The Strategic Road Network and the Delivery of Sustainable Development.	Noted	No change
Hellesdon PC	Jonathan Hall	-	Dated 6 th November 2013 – email No comments	Noted	No change
Design Council	Jessie Prior	-	Dated 4th November 2014 – email General comments only in regard to plan making and design.	Noted	No change

Organisation	Who	S/ 0	Comment	Council Comment	Actions
(CABE)			- Plans should tell the story - Proactive and positive about the future of the place and how this will be achieved - Say it clearly Further advice is contained in various publications.		
Norfolk County Council	Richard Drake	-	Dated 6th November 2013 Consider providing additional guidance on the policy content. The Norfolk Mineral and waste core strategy should be included in the SPD as this forms part of the development plan. Suggested text <i>Any future proposal for a food and agriculture hub will also need to have regard to their documents within the Development Plan for Norfolk, In Particular the Norfolk Minerals and Waste core strategy – Policy CS16 safeguarding. There is the potential that any site proposed for a Food Hub based on this SPD may be located on defined Mineral Safeguarding Areas, and that a mineral assessment and potentially prior extraction may be required in order for future development to comply with policy CS16. It is recommended that pre application discussions with Norfolk County Council, in its capacity as the Mineral Planning Authority, are undertaken.</i>	Noted The SPD is not site specific. The SPD is supplementary to a policy in the JCS, and not any policies in the Norfolk Minerals and Waste Core Strategy. Any relevant policies in a Development Plan Document, such as the NMWCS, would be taken into account in considering a specific proposal as part of an application for planning permission. It is not necessary to include reference to all DPDs in the SPD.	No change
Sprowston TC	Evelyn Elliot	-	1st November 2013 – email The SPD lacks ambition and detail. The SPD should concentrate on high technical and high value schemes.	Noted, The SPD is non site specific. Its intention is to assist guiding interested parties and planning application on scale/ design, types of uses and locational issues, but must be flexible enough to guide as yet unknown proposals	No change
Member of Parliament South Norfolk	Richard Bacon	S	Dated 31st October 2013 Please to support South Norfolk and Broadland Councils on this guidance The criteria for consideration of a proposal is particularly welcome and will allow for the development of a hub in the areas where the hub could both provide and receive the greatest	Support is noted and welcome	No change

Organisation	Who	S/ 0	Comment	Council Comment	Actions
			Vision is to maximise employment opportunities Distribution efficiencies Maximise infrastructure contributions SPD fails to address market demand and identifies the wrong sectors for growth and added value. “ <i>there is evidenced by the clear misconception.</i> <i>That there is sufficient existing value in raw agricultural produce to warrant dedicated storage and distribution park with in Norwich.”</i> <i>“It is more efficient to transport refined added value goods than raw produce”</i> The restrictive land use mix imposed will “<i>impact on added value</i>” as currently proposed directly limits the ability of any proposal to meet specified aims of the JCS in terms of employment provision. The SPD should be more aligned to the Honingham Farm Proposal rather than the delivery of a storage and distribution park. – reflecting market demand and economic growth opportunities. Currently there are concerns that this advice is not being followed in the production of the SPD and the council’s justification of this is refuted and unfounded. Namely: - Concerns about out of town retail development The intent is to raise the profile of the Norfolk food industry , retail sales would be ancillary - Impacts on existing employment allocations There are no other suitable allocations with in Broadland and South Norfolk for major food processing / storage & distribution – hence the ethos of the Food Hub - Limited demand for food processing through the local plan process or economic development informal enquiries.	The scale and design of any proposal will need to be appropriate to its surroundings, and intended use The SPD is non site specific. Its intention is to assist guiding interested parties and planning application on scale/ design, types of uses and locational issues See also scale and uses issues discussed under other responses above	

Organisation	Who	S/ 0	Comment	Council Comment	Actions
			There is unmet market demand but without a credible alternative existing firms will only expand or move to other less constrained areas. - Concerns that large scale business would not locate on a food Hub The idea of sharing resources, links to labour force, education and knowledge hubs is the very ethos of the Food Hub Concept. - Concerns regarding the supply of water resource for food processing There is potential for the re use of water from industrial processes for use in other agricultural production in the wider area. As a way forward it is suggested as a minimum that : <u>Primary uses</u> are amended to reflect - Processing of agricultural produce at whatever scale is appropriate - Manufacturing of food - Storage and distribution of agricultural produce - Storage and distribution of Livestock - General Haulage - Display and wholesaling of agricultural and food products - Education and training <u>Secondary Uses</u> Manufacturing of non-food agricultural products Manufacture agricultural equipment Storage and distribution of agricultural equipment Veterinary services Offices linked to primary uses - Size is not limited to 10 ha on the initial proposal - The primary focus in on crops, products etc. should be amended to “from Norfolk” instead of from the “ Greater	The wording in the SPD 3.1(3) acknowledges that it might be	

Organisation	Who	S/ O	Comment	Council Comment	Actions
			Norwich Area" 4. Remove reference the "a food and agricultural hub will not be a suitable location for large scale food manufacture/ processing" 5. Assuming the above is acceptable in land use terms, the principle of a suitable proportion of secondary classification land uses is acceptable. A second representation was also submitted comprising of a site specific Highways Access Strategy for the site at Easton. (9th December 2013).	appropriate for crops to be from outside the Greater Norwich Area. This relates to a site specific comment and is not a consideration of the SPD	
Martin Collison Associates	Martin Collison on behalf of Norfolk Food Hub - Ian Alston	S & O	Dated 9th December 2013 Supportive of the SPS concept and commitment but suggest further changes to the use categories in order to realise the Food Hubs economic potential and development must respond directly to market demand. This is for locally branded food production and distribution, food experience and education. <u>Objectives</u> should be: 1. Market focus – respond to increased demand for production of food and food products 2. Maximising / retaining value in the Norfolk economy 3. Job creation / inward investment 4. Support new start-ups as well as larger established business through the opportunities to expand 5. Promotion of Norfolk's Food and Drink Industry, retail outlet/ R&D linked to science and education <u>Purpose</u> should be to maximise the economic multiplier effect by exploiting the current and predicted economic growth. Suggested changes: 1. Food Hub promoting "local food" must support at least food from the whole county.	Noted See also scale and uses issues discussed under other responses above JCS Policy 5 refers to a flagship food and farming hub serving the needs of Norfolk, providing opportunities to co-ordinate activity & access larger markets, be a focus for supporting ancillary businesses /suppliers and the relocation of the livestock market.	See changes under Royal Norfolk Agricultural Association, NFU, Suffolk County Council and New Anglia LEP above

Organisation	Who	S/ 0	Comment	Council Comment	Actions
			Justification: • Currently Norfolk is a strong sector for farming, food and drink and exports produce for processing • Food & drink sector is expanding, 17% growth 2007 -11 in food processing, 37% - agriculture (DEFRA 2012, ONS 2013). – need for Norfolk producers to capitalise on this growth and projected 40% growth by 2030 caused by increased consumer demand for added value food services and population growth / agricultural productively requirements. • Survey data shows the concept pf local means county / regional wide. Only 40% think that local food means immediate vicinity. • In order to be successful in the supply chain food hubs need to consolidate food from many suppliers from a wide area so the offer to major outlets is varied and attractive. • Focussing too small or on niche markets is not ambitious does not create jobs or address where the demand / growth potential is. 2. Food hub must support <u>food processing alongside logistics</u> to meet the needs of food companies and satisfy demand. Failure to do so runs the risk of investment going elsewhere. Justification: • Most of rapidly growing agricultural business in Norfolk combines primary agriculture agricultural production with food processing, logistics and wholesale. • • Agricultural sector is disproportionally large compared to food processing sector in the county • Decline in agricultural income and essential to invest in	The wording in the SPD 3.1(3) acknowledges that it might be appropriate for crops to be from outside the Greater Norwich Area.	

Organisation	Who	S/ 0	Comment	Council Comment	Actions
			processing and wholesale. • Increased demand for “food-telling” as a key trend • Proximity to research at NRP is an opportunity to exploit. • Sector will create higher value jobs and support farm output and logistics without displacement of jobs • Create inward investment through economies of scale for existing companies and “can do” attitude by being responsive to needs of international companies • Constraining the use to only one section of the food chain runs the risk that investment will go elsewhere. 3. Food Wholesaling - with the right investment in wholesaling linked to storage, distribution and food & drink manufacturing there is a large potential to create additional high value jobs. Justification • Storage and distribution divorced from wholesaling is a deviation from the natural business model in the food industry which every successful food hub in the UK integrates. • A logistic hub as part of the food hub will help to ○ Streamline distribution ○ Access new markets ○ reduce vehicle movements • Risk that a single focus on distribution may result in a loss of jobs and displacement from other distribution centres. • If the county is to grow its food processing capacity and retain more GVA then there is a requirement to increase both wholesale and distribution to national markets. • Risk of double handling and increased cost/ prices if wholesaling / distribution is a separate location. 4. Create a shop window to promote the depth and scale of food production in Norfolk.		

Organisation	Who	S/ 0	Comment	Council Comment	Actions
			• Other parts of the UK who want to develop a Norfolk base • Existing companies that are currently constrained growth • Existing companies who wish to achieve greater efficiencies in processing Norfolk agri-food products The Food & Drink sector is in the top 10 sector for attracting Foreign direct Investment. Norfolk's low share of food processing and high share of agriculture coupled with a food hub providing modern integrated logistics, strong local supply base, R&D cluster should allow Norwich to compete successfully bringing inward investment, growth of existing companies and new start-ups, helping to grow Norfolk's economy. <u>Conclusions</u> Welcome the commitment to the food hub, but the SPD should reflect / respond to market demand which is "for added value, locally branded food production and distribution, food experience and education. • Norfolk is already undersupplied in food processing relative to its share of agricultural production. • Utilising this use in the food hub will not cause displacement rather it will lead to the creation of high value jobs, in a growing sector • Offer benefits of R& D , food traceability and increased accountability/ traceability in the food supply chain • The uses must be balanced in the food industry to have the scope to fulfil its potential. • The primary uses must be expended to include : ○ Processing of agro produce ○ Education and training related to agriculture and food ○ Display, wholesaling and retailing of agricultural products		

Organisation	Who	S/ O	Comment	Council Comment	Actions
			- Two current uses identified as primary should be identified as secondary as they are complementary - Storage and distribution of agricultural equipment, machinery and supplies - Veterinary services <u>Recommends the SPD use be</u> Primary - Processing of Agricultural produce, - Manufacturing of food products - Storage & distribution of agricultural produce - Storage & distribution of agricultural products(processed) - Storage and distribution of livestock - Haulage services related to the above storage and distribution - Display, wholesaling, retailing of agricultural and food products - Education / training related to agriculture and food Secondary - Manufacture of non-food agricultural products - Manufacturing of agricultural equipment, machinery and - supplies - Storage and distribution of agricultural equipment, machinery and supplies - Veterinary services - Offices necessary as part of a primary use	Welcome general support and endorsements from potential end users and interested parties. Some letters are however dated and refer to specific correspondence which the council is not party to, and appear to relate to a specific proposal.	

Supporting representations received from Lanpro December 9th 2013. These comments have been taken into account in considering the Lanpro representation. Support from MPs, companies and others for Lanpro's proposal noted.

Organisation	Who	s/ o	Comment
Member of	George		Dated 13 07 11, received December 9 th , 2013

Parliament – Mid Norfolk	Freeman	I am extremely enthusiastic about this project, and will promote the scheme to the Council. It will provide a huge boost to the economy. Will write to Chief Executive of NCC and Cliff Jordan Dated 30 09 11 Ref forwarded copy of David White reply letter from NCC
Member of Parliament – Broadland	Keith Simpson	Dated 19 08 11, received December 9th , 2013 I have today written to the Transport Secretary of State drawing his attention to ludicrous situation. Food Hub Must be encouraged.
Member of Parliament -North Norfolk	Norman Lamb	Dated 25 09 11, received December 9th , 2013 I am keen to support - fantastic Initiative I have written to the Secretary of state for Transport asking him to ensure the project is not unnecessarily delayed
Member of Parliament SW Norfolk	Elizabeth Truss	Dated 23 06 2011, received December 9th , 2013 Happy to help, suggest a joint approach to highways.
Norfolk County Council	David White Chief Exec	Dated 10 09 11, received December 9th , 2013 – re George Freeman MP NCC has been and remains very supportive of the Food Hub proposal in terms of its potential contribution to the local economy. There are practical issues that need to be resolved. - Outstanding transport work by promoters. NCC / HA cannot accurately determine mitigation and promoters assumptions are premature in regards HA - NCC happy to facilitate discussions with relevant parties through Ann Carruthers, Transport Planning Strategy Manager.
Frank Dale Foods Ltd		Dated 25 11 13, received December 9th , 2013 Reported that Robert Dale (MD) see Food hub location is a major advantage – access onto A11 Currently investing in present site and experiencing rapid growth to meet 5 year plan to double sale. If this growth is faster than predicted then Food hub is the best re location.
CLA East	Claire Wright	28 November 2013 , received December 9th , 2013 (copy of submission) Endorse correct approach for location to be close to Norwich and take full account of established transport links and educational / research opportunities. Support the scale and design as an appropriate balance of rural economic development and the protection of the landscape Users should be linked to development of food production and agriculture from Greater Norwich and wider region. Increase floor space for ancillary uses to 50% to ensure food agriculture hub presents greatest benefit to the rural economy. 5 December 2013 Additional comments

			Vital importance that the food hub supports food education, though establishing links with surrounding institutions Considerable benefits of congregation of specialist food sector Concerns re proposed scale are insufficient to attract large scale processing – skilled labour/added value etc.
Harvey& co	David Harvey		Dated 9th December 2013, received December 9th , 2013 • Important to understand that demand will manifest over time and may not be possible to identify immediate demand, and recognise the need for scale and critical mass. ○ Vision should include reasonable expectation at concept stage of genuine demand and expansion. ○ Provide long term certainty and space to enable future expansion and keep firms in the district ○ NRP – recent expansion and major driver/ magnet of inward investment at the time extent of demand not identified -object is to set the conditions in which emerging demand take advantage of over time without obstacles to delivery. And provide a long term strategy. ○ The site must be of sufficient size to accommodate a reasonable expectation of longer term demand. ○ Broadland Business Park – gave major firms choice ○ Beacon Park in G Yarmouth – now become cluster for energy sector, but long term vision provided the land ○ Large enough to generate critical mass. – i.e. accommodate a range of organisations to warrant central facilities - 25 acres will struggle to establish credibility • Requirement for choice and opportunity for clusters from co location ○ Food industry in generally land hungry, land prices on existing employment site sites is high in excess £400,000 /acre. Cheaper land proposed @ food hub of £150 - £200,000/ acre is an affordable choice. ○ Promoting clusters is part of Governments growth agenda and LEP's Feb 13 growth strategy • Sites need to large enough to embrace a range of uses and allow segregation ○ Existing commercial enterprises show that the proposed 25 acre site is two small and would not allow processing firms to relocate. At best only 2 firms could be established based on current land use of existing firms e.g. Banham Poultry, Kettle foods, Britvic soft Drinks ETC ○ Must be large enough to allow for segregation of uses e.g. ○ Public areas – retail/ cultural ○ R& D / Office ○ Production ○ Livestock / farm machinery. Summary the driver is the long term vision.
UEA	John Turner (professor)	s	Dated 5th Dec 13, received December 9th , 2013 Strong support given for the food hub

Sands Agricultural machinery LTD	T N Sands	S	Dated 09 December 2013 Re proposed development @ Honington Thorpe. NNDC have not found many suitable options in the past 3 years to which I could expand / relocate my business. I am now looking further afield and would be interested in your site. Well connected for Norwich and subcontractors with space for demonstrations and open days (need approx. 6 acres).
McVeigh Parker Co Ltd	Lucy McVeigh	s	Dated 040613, received December 9th , 2013 Currently found somewhere else, but keen to be involved.
Randells	William Randell	s	Dated 4 11 13, received December 9th , 2013 Confirm still interested in the site for farm and garden machinery business. Good central location Neighbouring business to increase footfall Display potential New build/ purpose design Require approx. 2.15 acres/ 1hectare
Kettle Chips	Dominic Lowe	S	Dated 4 th December 2013, received December 9th , 2013 Kettle food Support the vision. It would add significantly to Norfolk as a centre of excellence for small food business
Brown and Co	Nick Dunn	S	Dated 5 th Dec 2013, received December 9th , 2013 Head of commercial agency in Norwich - 100acre site at Easton is : Central with excellent transport links, easy access to labour market, proximity to largest agri- food research in Europe at NRP, potential for educational links with Easton college. Size needs to be capable of accommodating demand, and future expansion. Consider there is excellent demand from agri/food based industries keen to locate to a centralised location, with benefit from proximity to R&R.
Norfolk Garden Preserves	David Atherton	S	Dated 25 January 2010, received December 9th , 2013 Welcome opportunity to learn more. Plans could include kitchen facilities which can be rented by small companies. A similar idea is being run in Cumbria Rural Enterprise Agency, and has allowed small scale local entrepreneurialism in the food industry.
Institute of Food Research	Professor David H Boxer	S	Dated 24 August 2010, received December 9th , 2013 IFR is only publically funded research institute in UK underpinning food and health. IFR leads research across BBSRC institutes, The John Inness Centre and the Genome Analysis Centre and the UEA. We support the food Hub and look forward to developing commercial and educational links.
Bartram Mowers Ltd	Mark Bartram	S	Dated 26 06 2009, received December 9th , 2013 Firm is interested in re locating to Easton – is depended on existing site which is currently undergoing LDF allocation process

Supporting documentation received from Lanpro regarding proposal / position of Honingham Thorpe Farms Ltd as promoters of the Norfolk Food Hub as of 18th December 2013 and 10th January 2014. These comments have been taken into account in considering the Lanpro representation. Support from companies and others for Lanpro's proposal noted.

Organisation	Who	s/o	Comment
Ben Burgess & Co	Ben Turner (MD)	s	Dated 9 th December 2013, received 18 th December 2013 Ben Burgess fully supports the concept of clustering food suppliers and associated industries such as agricultural machinery dealers on one site with good access to the A47. Educational links with Easton college would be useful to address shortage of skilled labour.
Royal Norfolk Agricultural Association	Greg Smith (Chief Executive)	S	Dated 9 th December 2013, received 18 th December 2013 Supports in context of growing investment in knowledge and competitiveness with additional benefits to the UK – development of food and agricultural sector hubs have the potential to increase economic output (jobs & wealth creation) and reduce impact on the environment / resource. Planning policy can help support business and investment and the development of a cluster will deliver higher skills and leadership Specific comments: • SPC is NPPF compliant, however important to consider viability of any proposal and coherence with existing related developments • Location should reflect and build upon existing highway improvement priorities • 10ha should not be used as a threshold. The size depends on viability and the provision of a comprehensive and sustainable development should be the principle objective. • Uses. – ○ the mix of business will depend on the location. ○ the SPD should not be prescriptive (more flexibility) ○ the mix should be based around the viability of core business and the wider benefits • Precise definition of “large –Scale” food manufacturing /processing would be a helpful addition.
Fresh Direct	Kamal	s	Dated: No date. (received 18 th December 2013) Recently taken over the Country fresh business and operating out of a short term, compact site at Hockering. Supports idea of cluster of local businesses and see economies of scale. Site of 1-2 acres could well be needed close to the A47 is ideal.

Ken Proctor	NFU (Norfolk Chairman)	s	Dated 9th December 2013, received 18th December 2013 NFU fully supports Lanpro plans for a food hub and centre of excellence west of Norwich. Sufficiently increasing processing facilities in line with the full proposals would help to address the lost “added value” and generate growth and employment. Norfolk has the largest agricultural sector of any county Disproportionate added value to the food production as much is processed out of the county. Uses – increasing food processing facilities should be seen as a priority along with R&D and Logistics. Benefits • Take ownership of food chain – promote local products • Facilitate greater collaboration between farmers and food processing • Help establish local market and stability of prices • Showcase variety of agricultural foods In order to make a real impact the hub has to operate efficiently and be of a size that does not compromise its ability to benefit the county’s businesses and consumers or undermine the entire project’s viability.
NFU	Rob Wise	s	Dated 9th December 2013, received 18th December 2013 Norfolk has the largest agricultural sector of any county Disproportionate added value to the food production as much is processed out of the county. Uses – increasing food processing facilities should be seen as a priority along with R&D and Logistics. Benefits • Take ownership of food chain – promote local products • Facilitate greater collaboration between farmers and food processing • Help establish local market and stability of prices • Showcase variety of agricultural foods Suggested Amendments to SPD : Increased flexibility of Uses (increase processing) suggests there should be no distinction between primary and ancillary uses. Flexibility must be applied to allow the most efficient growth to maximise jobs
Anglia Farmers LTD	Clarke Willis (Chief exec)	s	Dated 10th December, received 18th December 2013 Anglia Farmers are “very Supportive” of proposed food hub at Honingham Thorpe: • The intended focus on food processing will help improve food traceability and transparency to the consumer • Address concerns regarding food mileage • Improve links with Institute of food research and development • Help in the creation of a strong local economy

			The location of the proposal is significant as it can benefit from economies of scale (compliment) agricultural industry Easton and Otley College, the Royal Norfolk Agricultural Association and the Institution of Food Research. The suggested 25 acres may not be sufficient.
Norwich Research Park	Dr Sally Ann Forsyth (CEO)	s	Dated 6 th January 2014, received 10 th January 2014 The vision of the NRP is to develop a thriving research and innovation campus by supporting spin out and start-up companies, as well as attracting inward investment, particularly from food, health and the environment. The development of a food hub fits well with the vision and the activities of food processing and distribution are complementary with world class research undertaken at the park. NRP are supportive of a food hub and its potential for developing closer links and collaboration with the group.
Norfolk Liquid Feeds LTD	Mike Beckett (MD)	s	Dated 2 th January 2014 - received 10 th January 2014 Currently part located at Norwich Livestock Market and Woodton, Bungay. Declares support in moving business to the proposed hub. Size requirements approx. 8,000 – 10,000 sq. ft.
Norwich Livestock Market Ltd	Mr Stephen Lutkin (Chairman), Mike Beeckett (Vice Chairman)	s	Dated 4 th January 2014 , received 10 th January 2014 Livestock market is very much in demand with the Agricultural community and with future planned improvements with planned market sales, the proposal would be an ideal position for the market to progress to in the future. Land required would be approx. 8 -10 acres.
A W Alston	Andrew Alston	S	Dated 31 December 2013, received 10 th January 2014 Food hub is central to Norfolk's Rural Development Strategy. Add value to farm produce, retaining it in Norfolk Attract Skilled workers Opportunity to develop now for the future Investment in processing compliments recent Rural enterprise grants and LEADER grants which has increased storage capacity for winter crops and increased water efficiency Opportunity to support change by creating local demand Changes in Agri Environment and EU policy mean more emphasis on added value crops Opportunities for start-up business on the site.
The Big Prawn co	Sean O Hanlon	s	Dated 5 th December 2013, received 10 th January 2014 Existing premises in Melton Constable constrained. Support visionary idea Plans to grow business from 50 – 100 employees with correct location

			Access to staff Access to A47 Opportunities for economies of scale Require approx. 3 acres
Anglian Pea Growers	Richard Hurst (Chair)	S	Dated 19th December 2013, received 10th January 2014 Existing freezing facility at Oulton Broad is poorly located on the outskirts of growing region with poor access. Opportunity for a more central location would benefit long term sustainability -improved access, improved efficiency and quality and open unit up to other markets and opportunities Site size approx. 5 ha