

Greater Norwich Local Plan (GNLP) Site Statement of Common  
Ground (SoCG)

Between

Broadland District Council, South Norfolk Council,  
Norwich City Council, Norfolk County Council

And

Pigeon Investment Management Ltd

Site Reference: GNLP0352

Site Address: Land north of Brecklands Road, Brundall

Proposed Development: High-quality landscape-led scheme comprising around 75 new homes, including affordable homes, self-build, bungalows and assisted living/care home provision, land for a two-form entry primary school together with extensive areas of publicly accessible amenity space/country park.

## Introduction

A representation was made by Pegasus Group for Pigeon Investment Management Ltd (Pigeon) by email on 16/3/20. The representation was overlooked by the GNLP team and this Statement of Common Ground is intended to clarify the situation (including a description of what issues remain for resolution at a future date) to allow the Inspector to consider the issue during the examination process.

## Background

Pigeon's Regulation 19 representation (rep ID 24099) states that Pigeon has been informed by the GNLP team that its previous representation in support of the allocation of Land north of Brecklands Road to the Regulation 18C consultation was mistakenly not taken into account in the preparation of the Pre-Submission Draft Strategy. Pigeon's Reg18C representation expanded the previously proposed use of the site (housing and open space) to include land for a two-form entry primary school. On 7/5/21 an email from Pegasus Group dated 16/3/20, enclosing Pigeon's Reg18C consultation response, was found in GNLP email inbox (it had been submitted 16/3/20). The email contained Pigeon's representation and a supporting delivery statement for site GNLP0352. Somehow this email, containing Pigeon's duly made representation, had mistakenly been overlooked. Post-Reg18C, site assessment was therefore not carried out in 2020 with other reps received during Reg18C, ahead of preparation of the Pre-Submission GNLP.

(NB GNLP officers are not aware of any other occurrence of representations having been received but overlooked and consider this to be an isolated incident)

## Initial Site Assessment

Due to the level of services available within Brundall it has been categorised as a Key Service Centre. However, GNLP officers and local Members are of the opinion that Brundall has relatively high levels of existing commitment, which has influenced the site assessment process. The result of the original site assessment process was to carry forward two allocations for open space, to safeguard the delivery of these should the permissions on them (for housing and open space) lapse. In this context, no new housing allocations were proposed in Brundall in the Reg18C draft version of the plan.

## Reg18C Consultation

During the Reg18C consultation no new or revised sites were submitted for Brundall (except for the representation from Pigeon with a revised proposed use for site GNLP0352, which was mistakenly overlooked). There were representations which emphasised the protection of allocated open space and those which questioned the proposal to carry forward the open space allocations in light of the permissions on the sites.

## Reg19 Publication

During the Regulation 19 publication period, Pigeon questioned the fact that their Reg18C representation was missing from the Statement of Consultation and the GNLP team became aware that the duly made representation had been overlooked. Pigeon subsequently made a Regulation 19 representation (rep ID 24099) which states that Pigeon has been informed by the GNLP team that its previous representations in support of the allocation of Land north of Brecklands Road to the Regulation 18C consultation was mistakenly not taken into account in the preparation of the Pre-Submission Draft Strategy. Pigeon's Reg18C representation expanded the previously proposed use of the site (housing and open space) to include land for a two-form entry primary school.

On 7/5/21 (following receipt of Pigeon's Reg 19 representation) an email from Pegasus Group dated 16/3/20, enclosing Pigeon's duly made Reg18C consultation response, was found in the GNLP email inbox by the GNLP team.

## Belated Site Assessment

Site GNLP0352 was re-assessed by officers in May 2021, considering the 'Delivery Statement' (submitted in 2020) and its appendices. This re-assessment took the same form as the assessments done for sites where additional evidence had been submitted or a revised use had been proposed during the Reg18C consultation.

For this site, as land for a primary school was principally the additional element proposed, the site assessment included liaison between GNLP officers and Children's Services (CS) to obtain a view of the suitability of the site for a school in Brundall. The position regarding the GNLP team's oversight was explained to the appropriate officer in CS and comments were received which reflected the position between April and June 2020 (and which continues to apply to date). The response from CS indicated that no land was/is required in Brundall for a new primary school, as by 2020 plans were "well underway" for a new primary school in Blofield (adjacent to Brundall). The sufficiency of this school provision within the plan period is not agreed between the parties.

The Delivery Statement produced by Pigeon also included an illustrative masterplan and a summary landscape assessment. The former site assessment prepared by officers in support of the emerging GNLP had found the site to be unsuitable for housing and open space, and GNLP officers are of the opinion that this view would not have been altered by the additional information provided in the Delivery Statement, had it been considered ahead of the preparation of the Regulation 19 Pre-Submission Draft Strategy.

## **GNLP's View**

The Reg18C rep which was overlooked was sent on the final day of the Greater Norwich Local Plan (GNLP) Regulation 18C consultation period when a large influx of representations arrived.

The belated site reassessment considered all submission documents in full. The element relating to school land was considered by Children's Services in the context of the situation in early 2020, when the submission was made. Children's Services' view and the GNLP team's view is that the planned new primary school in Blofield will meet the expected primary education needs arising from the housing planned locally within the plan period, i.e. to 2038. The reassessment has not altered the view of GNLP officers that the site is not suitable for allocation at the present time, considering the relatively high outstanding levels of commitment and the proposal to provide a school in the adjacent village.

It is proposed to publish an addendum to the Site Assessment Booklet for Brundall to address the previous oversight and incorporate Pigeon's Reg18C rep into the published material.

## **Pigeon's View**

Pigeon consider that there has been a breach of Regulation 18(3) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which requires that all representations are taken into account. Pigeon acknowledge that this is a genuine oversight on the part of the GNLP team and that officers have attempted to rectify the situation by undertaking a retrospective assessment of the site following the Regulation 19 consultation.

Pigeon maintain that there is a need for additional school places in Brundall during the plan period as evidenced in the 'School and Childcare Sufficiency in Norfolk, March 2019' Children Services Committee paper enclosed as Appendix 2 to Pigeon's Regulation 19 representation for Land north of Brecklands Road, Brundall. The Children Services Committee paper refers to the requirement for additional school capacity for both Blofield (medium term 2-3 years) and Brundall (longer term 10 years). As such, Pigeon maintain that in order to provide a sound GNLP that meets educational needs as required by national policy it will either be necessary to allocate the Land north of Brecklands Road or to identify an alternative solution to meet the longer-term educational needs of the settlement within the plan period.

The Site Assessment Booklet for Brundall identifies that objections were received to the allocation of Land at Brecklands Road primarily identifying an inability of existing services to accommodate additional development and a perception that Brundall was already receiving too much growth. These comments do not take into account the ability

