



GREATER NORWICH LOCAL PLAN EXAMINATION

Examination Hearing Statement for Matter 1

**Response on behalf of Pigeon Investment Management Ltd and their
Landowners**

January 2022

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1. INTRODUCTION

1.1 This Hearing Statement has been prepared by Pigeon Investment Management limited ("Pigeon") and their Landowners, in respect of a number of land interests within both Broadland and South Norfolk Districts.

1.2 Pigeon has previously submitted representations in response to the Greater Norwich Local Plan (GNLP) and the accompanying Sustainability Appraisal (SA), including the Pre-Submission Regulation 19 Publication Stage, where we submitted representations in support of the following sites:

- Land north of Brecklands Road, Brundall (GNLP0352)
- Land at Nelson Road, Diss (GNLP1045)
- Land at Walcot Green Lane, Diss (GNLP1044R)
- Land at Hethersett (GNLP4054, GNLP1023BR, GNLP4052, GNLP4052)
- Land at Dereham Road, Reepham (GNLP0353R)
- Land at Rightup Lane, Wymondham (GNLP0355)

2. MATTER 1 – COMPLIANCE WITH STATUTORY PROCEDURES AND LEGAL MATTERS

Issue 2: Does the Sustainability Appraisal (SA) including the addendum, adequately assess the environmental, social and economic effects of the Plan in accordance with legal and national policy requirements?

Q3. Have all potential site allocations been assessed on a comparable basis?

- 2.1 Pigeon do not consider that all sites have been assessed on a comparable basis.
- 2.2 From our review of the SA that accompanies the GNLP it is apparent that there are a number of inconsistencies between the assessment of potential site allocations. These are detailed in our response to the Pre-Submission consultation¹.
- 2.3 In addition, we do not consider that the SA that accompanies the Pre-Submission GNLP has assessed site GNLP0352 (Land at Brecklands Road, Brundall) adequately. The appraisal appears to be on the basis of the provision of 366 homes (as set out on page B36 of the 2020 SA that accompanied the Regulation 18 consultation), notwithstanding the fact that this is not and has never been proposed on the site.
- 2.4 Without an appraisal of the site for the proposed scheme comprising a high quality, landscape and design-led sustainable scheme for open space, including a country park, 75 new homes, assisted living/care home accommodation and land for a school, the SA does not accord with Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended).

Summary: Not all sites have been assessed on a comparable basis.

¹ Pigeon representations to the Prep-submission GNLP for Land north of Brecklands Road, Brundall; Pigeon representations to the Prep-submission GNLP for Land at Nelson Road, Diss; Pigeon representations to the Prep-submission GNLP for Land at Walcot Green Lane, Diss; Pigeon representations to the Prep-submission GNLP for Land at Hethersett; Pigeon representations to the Prep-submission GNLP for Land at Dereham Road, Reepham; and Pigeon representations to the Prep-submission GNLP for Land at Rightup Lane, Wymondham.