



GREATER NORWICH LOCAL PLAN EXAMINATION

Examination Hearing Statement for Matter 10

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

February 2022

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 10 – HOUSING AND MIXED USE ALLOCATIONS - NEW SITES WITHOUT PLANNING PERMISSION THAT ARE ALLOCATED FOR LESS THAN 500 DWELLINGS

Is the proposed site allocation soundly based? In particular:

Main Towns

Site j. Land at Frontier Agriculture Ltd, Sandy Lane, Diss (Ref GNLP0102).

1. Is the allocation justified and is it supported by the evidence?

2.1 The Part 2 Sites Plan states (para. 4.20):

"With the exception of one site, decisions on the allocation or reallocation of development land in Diss are devolved to the neighbourhood planning process.

...

2.2 The Sites Plan continues (para. 4.21):

"The one allocation to be made in Diss ... is an established business that has expressed its long-term ambition to relocate, most likely towards the end of the plan period. The brownfield status of the land along with its proximity to the town centre, railway station, and local bus routes, makes it an exceptional opportunity for higher density brownfield redevelopment. Such brownfield sites are prioritised in national planning Policy ..."

2.3 It would appear that the reason for the Site Plan including this site as a proposed allocation is due to its previously developed nature, and location, rather than evidence that the site will come forward during the Plan period.

2.4 The proposed allocation at GNLP0102 is in continuing use as an employment site by the UK's leading crop production and grain marketing business. The site provides one of the company's nationwide network of grain storage and processing facilities each of which are located in strategically placed locations to provide optimum accessibility for producers across the local area.

2.5 It is unclear whether the delivery of the site is dependent on the relocation of the current use to an alternative site and indeed whether such a suitable site will be identified during the Plan period.

2. Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

- 2.6 The only assessment of environmental and other constraints is that set out in the HELAA (December 2017), which identifies constraints relating to:
- Access and highways;
 - Utilities capacity;
 - Contamination;
 - Flood risk;
 - Biodiversity; and
 - Heritage.
- 2.7 The 2017 HELAA simply concludes that the site is suitable as all of these matters: *"... should be able to be overcome."*
- 2.8 Section D2 - Site Allocation Statements of Common Ground/Delivery Statements, of the Local Plan Examination includes a SoCG dated October 2021 (D2.81), which confirms that no technical assessments of the site appear to have been carried out.
- 2.9 Given the site is located adjacent to the railway and is a brownfield site, it is highly likely that noise and contamination may present a constraint to the site capacity, and potentially its overall delivery.
- 2.10 In summary, it is considered that the environmental and other constraints, and implications for infrastructure, have NOT been properly assessed, and there is no evidence that these constraints or implications can be appropriately mitigated.

3. Has the availability, viability and deliverability of the site been robustly assessed?

- 2.11 With regard to availability, the Part 2 Sites Plan states (para. 4.21):
- "The one allocation to be made in Diss via the GNLP is the Frontier Agriculture site on Sandy Lane. This is an established business that has expressed its long-term ambition to relocate, most likely towards the end of the plan period. ..."*
- 2.12 However, the SoCG (D2.81) states:

- "The site is entirely owned by Frontier Agriculture and will be available for development following the relocation of existing facilities on site, which is anticipated within approximately 3 years. ..."*
- 2.13 On this basis the site will not be available for development until, approximately, October 2024, which is contrary to the assertion in the Sites Plan.
- 2.14 However, the HELAA (December 2017) states, with regard to availability:
"The proposer has indicated that the site is likely to be available ... by April 2021 ..."
- 2.15 Clearly this has not proven to be the case and casts doubt over whether the site will in fact come forward for redevelopment at all.
- 2.16 As the Sites Plan notes, the site is an established business and no evidence has been provided in relation to whether the allocation assumes that the business will cease operating or will relocate to another site.
- 2.17 With regard to viability, the 2017 HELAA simply states that the site:
"... has been submitted by a landowner/promoter as viable for the form of development proposed ..."
- 2.18 Given that the form of development proposed is stated in the HELAA as being 'residential development of an unspecified number', this is considered to be akin to a leap of faith and there is no evidence to suggest that the site (approx.. 3.61 ha) is capable of accommodating this scale of development.
- 2.19 With regard to developability, the 2017 HELAA simply states that the site:
"... is assumed to be developable ..."
- 2.20 In summary, it is considered that the availability, viability and deliverability of the site has not been robustly assessed, and the evidence suggests that the site is neither deliverable, nor developable.

4. Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)

2.21 The SoCG states:

"Initial discussions have been held with the LPA in 2020 and commencement of the pre-application process is likely to take place in mid-2021. Subject to this and progress on the Local Plan, it is anticipated that a planning application would be submitted by 2023."

and:

"Subject to securing planning permission, it is anticipated that development could commence in 2024 in a single phase and take approximately 2 years."

2.22 On this basis, development will take place between late 2024 and late 2026, delivering 75 homes per year (i.e. approximately 25 in 2024/25, 75 in 2025/26 and 50 in 2026/27).

2.23 In contrast the latest trajectory (D3.2C) shows the sites as delivering 75 homes per year in 2025/26 and 2026/27.

2.24 Given the need to address all of the environmental and other constraints identified, including the potential need to relocate the existing business (see Q2 above), this would appear to be distinctly ambitious.

2.25 In summary, there is no evidence to support the delivery of housing as per the expected trajectory.