
Matter 11 Housing and mixed use allocations – sites currently allocated in an adopted development plan, without planning permission

Urban Fringe - x. Land at Hospital Grounds, southwest of Drayton Road, Hellesdon (reference HEL1)

1 Introduction

- 1.1 Within our regulation 19 representation (ID 23910) we contend that the GNLP is not legally compliant or sound in, inter alia, the Partnership's approach in "rolling" forward site allocations. This statement supplements those representations, specifically in relation to question 5 of Matter 11 – "*Are the detailed policy requirements that would apply to the allocation justified and effective?*"

2 Update

- 2.1 The Statement of Common Ground (SofCG) between the Partnership and Hellesdon Parish Council (HPC) (document reference D2.70) states under section 4, "*negotiations with the owners of the Jarrolds site, despite attempts via Broadland District Council last year (2020), have not been productive or particularly positive in acquiring any additional recreational land for Hellesdon*". I note that the SofCG is signed on behalf of HPC by its Chairman, Cllr David King dated 11 January 2022. However, representatives of Jarrold & Sons, HPC and officers of Broadland District Council met on 24 March 2021 to progress discussions in relation to site reference GNLP2173 and the potential acquisition by HPC from Jarrold & Sons of a proportion of that site. Subsequent correspondence seek to continue the productive nature of discussions held during that meeting.

3 Supplement

- 3.1 I note under the news section of the GNLP website dated 4 February 2022 that HPC has submitted a Sport and Open Space Needs Assessment for Hellesdon, March 2020 (document reference D2.70.1). This document does not appear to be either a statement of common ground or a delivery statement and it does not appear to be referenced in the SofCG between the Partnership and HPC. Notwithstanding the need for legal clarity on the inclusion of that document at this stage of the local plan process, our representations to the Regulation 19 stage refer it. It was submitted by HPC to the Regulation 18c stage. The Partnership had referred to it as part of their justification for not progressing the reasonable alternative site GNLP2173, despite it not forming part of the evidence base to the GNLP. If the Partnership wish to submit the Sport and Open Space Needs Assessment for Hellesdon, March 2020 prepared by Ploszajski Lynch on behalf of HPC as part of the evidence base to the GNLP, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, formal public consultation should be afforded to those wishing to submit representations to highlight its failings.



- 3.2 Despite fundamental flaws in HPC's Sport and Open Space Needs Assessment, its conclusions on need for sport and open space in Hellesdon (which we contend) inadvertently challenge the soundness of the GNLP insofar as site Policy HEL1 has been carried forward as an allocation, without adapting the policy wording to seek to meet the area's sport and open space needs.
- 3.3 If there is a need for sport and open space provision across the Greater Norwich area, the site selection process for assessing the preferred options for sport, recreation and open space provision against the reasonable alternatives, should be subject to SA in accordance with the SEA Regulations. During Matter 1, Issue 1 of this examination Mr Walchester on behalf the Partnership stated in relation to HEL4, "*What we have done, where there are existing needs that we know of, long standing needs for open space in some areas, parish councils who want to achieve open space and so certain policies have been carried forward but there is still evidence behind those continued allocations. Presumably will be discussed at site stage.*"
- 3.4 The relevance of the above to rolled forward allocation HEL1 is that if there is a demonstrable need for recreational open space within Hellesdon (we contend that there is no evidence to suggest this is the case and thus why Land to the rear of Heath Crescent (GNLP2173) was incorrectly assessed in the SA) an area to serve that need should form part of HEL1. I anticipate that the Partnership will explain under Matter 11 why, if there is any evidence base need for recreational open space why policy wording for HEL1 has not been updated to reflect this.
- 3.5 The detailed policy requirements contained in HEL1 are not effective, in relation to the National Planning Policy Framework (NPPF) or the GNLP's objectives as stated under paragraph 151 of the Draft Strategy (document A1):

"Communities: To grow vibrant, healthy communities giving people a high quality of life in well designed developments with good access to jobs, services and facilities . . ."

"Infrastructure: To promote the timely delivery of infrastructure to support existing communities, growth and modal shift in transport use; and to improve connectivity to allow access to economic and social opportunities."

"Delivery: To promote the delivery of housing, jobs and infrastructure to meet identified needs, supported by intervention mechanisms where the market is unable to deliver."

[CODE emphasis.]

- 3.6 If there is evidenced need for recreational open space as stated (although we can find no compliant evidence to justify this) the policy wording for rolled forward allocation HEL1, should be updated to reflect this. There is greater certainty of delivery of infrastructure if that infrastructure is specified and forms part of an allocation for a mix of uses (the drivers for development and spatial change, residential and employment, bringing forward the infrastructure requirements, such as recreational open space).



3.7 It is noted that ownership Title Register NK401199 relating to land at Hospital Grounds includes land that is not proposed for allocation as well as that which is. It is not clear whether alternative scenarios for HEL1 were considered between the Partnership and the Norfolk and Suffolk NHS Foundation Trust, to explore how other land within the latter's control could come forward as part of the allocation to meet the recreational open space needs of Hellesdon as well as the housing needs.

4 Remedy

4.1 Jarrold & Sons contends that if the Inspectors conclude that there is evidence for recreational open space, in order for the GNLP to remedy its failure to satisfy the tests of soundness the following wording should be inserted into policy HEL1:

Policy HEL1 Land at Hospital Grounds, southwest of Drayton High Road, Hellesdon (approx. 14.7 ha) is allocated for Mixed-Uses including residential, ~~and~~ employment and formal publicly accessible recreational open space uses. The site will accommodate approximately 300 homes, and E(g) employment uses. More homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints. The development will be expected to address the following specific matters:

[insert new seventh point]

7. Provide formal and informal publicly accessible recreational open space, to meet the needs of the development and 2.18ha of formal publicly accessible recreational open space to meet the needs of the wider community.

4.2 Jarrold & Sons contends that if the Inspectors conclude that there is no evidence for recreational open space, the remedies should be as follows:

- a) In order to remedy the legal failings the SA needs to be amended and reassess strategy and site allocation policies.
- b) The GNLP Site Assessment Booklets should be amended to follow and reference the SA assessment.
- c) These amendments will lead to amendments to the policies and supporting text contained in the GNLP. Consequently, further formal public consultation will be required.