

Matter 10
Norfolk & Suffolk NHS Foundation Trust (24110)
Land at Hospital Grounds, southwest of Drayton Road, Hellesdon



GREATER NORWICH LOCAL PLAN EXAMINATION HEARING STATEMENT

Quality Assurance

Site name:	Greater Norwich Local Plan Examination Land at Hospital Grounds, southwest of Drayton Road, Hellesdon
Client name:	Norfolk & Suffolk NHS Foundation Trust
Type of report:	Hearing Statement
Prepared by:	Iain Hill MSc DipTP MRPI
Signed	
Date	10 th February 2022
Reviewed by:	Sarah Hornbrook MA (Cantab) MSc MRTPI
Signed	
Date	10 th February 2022



Background

- 1.1 This Hearing Statement has been prepared by Bidwells LLP on behalf of the Norfolk & Suffolk NHS Foundation Trust (ID:24110) in support of representations made to the Greater Norwich Local Plan.
- 1.2 This Statement seeks to address Matter 11 Housing and mixed-use allocations – sites currently allocated in an adopted development plan, without planning permission, with specific regard to the following site which is owned by the Norfolk & Suffolk NHS Foundation Trust:
- x, Land at Hospital Grounds, southwest of Drayton Road, Hellesdon (Ref HEL1)

Response to Inspector's Questions

Matter 11 asks is the proposed allocation soundly based. In particular:

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

- 1.3 The allocation of Hellesdon Hospital (Policy HEL1) is considered to be fully justified and supported by evidence.
- 1.4 As detailed in the representations submitted to the Regulation 19 Publication on behalf of the Trust (ID:24110), the site is located in Hellesdon which represents a highly sustainable location with good access to Norwich, that has been significantly enhanced by the recent delivery of the Broadland Northway.
- 1.5 The suitability of the site for development is recognised by its allocation in the Adopted Development Plan (Broadland Site Allocations DPD, 2016). The site is in the sole ownership of the Norfolk and Suffolk NHS Foundation Trust who remain committed to the redevelopment of the site.

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

- 1.6 Environmental and other constraints were considered as part of the allocation of the site in the Adopted Development Plan (Broadland Site Allocations DPD, 2016). Circumstances have not changed in the period since to change this position.
- 1.7 In addition, the representations submitted to the Regulation 19 Publication on behalf of the Norfolk and Suffolk NHS Foundation Trust (ID:24110) are informed by technical evidence demonstrating the suitability of the site, having regard to both potential constraints and the ability to implement mitigation required by draft Policy HEL1. More specifically, the representations are supported by evidence, including an Indicative Masterplan, which demonstrates that the site can be developed to in accordance with the specific requirements of the draft policy, subject to minor alterations.
- 1.8 On this basis, it is evident the potential constraints to development on the site have been fully considered and that mitigation required by the draft policy can be achieved.

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

- 1.9 The Norfolk & Suffolk NHS Foundation Trust have signed a Statement of Common Ground with the Greater Norwich Development Partnership (D2.77), which confirms that having regard to the requirements of Policy GNLP0311, 0595 and 2060 and other general requirement of the plan, the site is available, viable and deliverable.
- 1.10 The Trust have recently appointed a full Project Team and intend to submit a planning application for the development of the site in either Quarter 2 or 3, 2022.
- 1.11 To date, no issues have been raised during the preparation of the planning application that are considered to impact the availability, viability and deliverability of the site.
- 1.12 Accordingly, the availability, viability and deliverability of the site is considered to have been robustly assessed.

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

- 1.13 The Statement of Common Ground between the Greater Norwich Development Partnership and The Trust (D2.67), includes commentary on the expected delivery of the site. The Trust remain committed to the delivery of the site in accordance with the commentary with the Statement of Common Ground and as detailed above are in the process of bringing forward an outline planning application. The Trust are hopeful that the delivery of housing will exceed the expected trajectory within Document 3.2C.

Are the detailed policy requirements that would apply to the allocation justified and effective?

- 1.14 The Norfolk & Suffolk NHS Foundation Trust support the principle of the allocation of the site for residential development under Policy HEL1. However, to ensure that the policy is both justified and effective, minor alterations are proposed to the wording of policy.
- 1.15 The policy should make it clear that alternative uses, notably employment, will only be required where there is a clear need for that use. In addition, in order to ensure the policy is flexible and capable of responding to changing circumstances, as well as consistent with the NPPF, it should recognise that other non-E(g) uses, which are capable of generating employment, will, in principle, be permitted on site.
- 1.16 Policy HEL1 advises that vehicular access to the site will be required to be taken from Drayton High Road and Hospital Lane. However, it has become apparent through discussions with both Broadland District Council and Norfolk County Council highways that it is not possible to provide access from Hospital Lane.
- 1.17 On this basis and in order to ensure that the site is deliverable within the plan period, the policy should state that vehicular access will be taken via Drayton High Road, with emergency and pedestrian / cycle access via both the existing Drayton High Road junction and Hospital Lane.

- 1.18 Draft Policy HEL1 advises that some of the significant former hospital buildings may constitute heritage assets that are worthy of retention. Whilst the Trust support the principle of preserving heritage assets, the policy should make it clear that the retention of such buildings is subject to it being demonstrated that their retention is both practical and viable.

Is any proposed uplift in capacity, or extension to the site, justified and supported by the evidence?

- 1.19 Based on a development of 300 units and the identified site area of 14.7 ha, the density of development equates to 20 dwellings per hectare. However, this density is lower than the indicative minimum densities set out in Policy 2 of the draft GNLP, which seeks a minimum of 25 dwellings per hectare (net).
- 1.20 An Indicative Masterplan submitted in support of representations submitted to the Regulation 19 Publication on behalf of the Trust (ID:24110) demonstrates how the site could potentially provide approximately 350 units, having regard to requirements in relation to, amongst other things, open space, as well the requirement to retain certain heritage assets.
- 1.21 Accordingly, it is evident that the site is capable of providing the minimum number of homes the policy seeks to accommodate on the site, whilst having the potential to accommodate more than 300 units, subject to detailed design considerations.

Suggested Revisions / Modifications

Policy HEL1

Land at Hospital Grounds, southwest of Drayton Road, Hellesdon (approx. 14.7 ha) is allocated for Mixed-Uses including residential and employment uses. The site will accommodate approximately at least 300 homes, and E(g) employment generating uses, subject to demand.

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:

1. A small amount of E(g) employment generating uses will, subject to proven demand, be considered appropriate e.g. ~~converting existing buildings~~.
2. Vehicular access via Drayton High Road ~~and Hospital Lane~~.
3. A pedestrian crossing is likely to be required on the A1067 Drayton High Road as are improvements to Middletons Lane / A1067 junction. Other off-site improvements to the highway may also be necessary, as required by the Highway Authority, subject to feasibility and viability considerations.
4. The site is shown on the historic environment record and therefore further investigation is likely to be required in respect of archaeology. In addition, some of the more significant former hospital buildings may constitute heritage assets that are, where practical and viable, worthy of retention.
5. The site falls within Source Protection Zone 3 and therefore pollution control techniques should be incorporated to ensure that development of the site does not lead to pollution of the water environment, including the River Wensum.
6. Norfolk Mineral and Waste Core Strategy Policy CS16 applies as this site is underlain by safeguarded mineral resources.

Strikethrough = Delete

Red Text = Replacement Text



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