

Greater Norwich Local Plan Hearing Statement

Matter 14 – Other site allocations and site-specific policies

Introduction

This Hearing Statement has been produced by Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council as the Greater Norwich Development Partnership (GNDP).

The Document Library for the Greater Norwich Local Plan (GNLP) Examination and further information can be found on the GNLP Examination website:

www.gnlp.org.uk

The Councils have responded to each question directly in the body of the Hearing Statement.

Issue 1: University related allocations

Site: Land adjoining the Enterprise Centre at Earlham Hall (Ref GNLP0133BR)

Question 1

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

Response to question 1

1. The allocation of site GNLP0133BR is justified as it is an appropriate site for university-related uses, including offices, research and development and educational uses. The site is currently allocated in Site Allocations and Site Specific Policies Local Plan 2014 (R39) although there is a reduction in site area compared to existing adopted allocation to account for development that has already taken place.
2. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site) and consultation comments (see Statement of Consultation [A8.1](#) and associated appendices).
3. The site is also identified within the UEA Development Framework Strategy (2019) ([B25.1](#)) which is a strategy which details how development will meet the future expansion needs of the University.

Question 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?

Response to question 2

4. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Norwich site assessment booklet ([B1.2](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, planning officers from Norwich City Council, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0133BR the main constraints were identified as its location within the Earlham Conservation Area Grade II registered Earlham Park Historic Park and Gardens and proximity to the Grade II* Earlham Hall. Earlham Park is also part of the Yare Valley green infrastructure corridor. These constraints are proposed to be mitigated through requirements in the policy (see [A2](#), pages 25 and 26).
5. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F1, F11 to F14 and G1) appraises the constraints and mitigation impacts

of the proposed policy. The sustainability appraisal concludes that the outcomes of the policy requirements result in a negligible impact on both the local landscape and the historic environment.

6. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices [A8.12](#) for regulation 18C and [A8.20](#) for Regulation 19). In the case of site GNLP0133BR a Heritage Statement ([B10.2](#)) has been produced in response to concerns raised by Historic England. The boundary for the allocation was also corrected following regulation 18C as advised by the site promoter.
7. Environmental and other constraints have been considered during the process of producing the UEA Development Framework Strategy refresh (the status of the UEA Development Framework Strategy is confirmed in response to [Matter 6 Issue 4 Question 3](#) (paragraphs 63) – 66 of the MIQs). Detailed engagement was undertaken with statutory bodies during the preparation of the University's updated Development Framework Strategy, including Norwich City Council and Historic England.
8. Site GNLP0133BR also benefits from being part of an existing allocation (R39) in the adopted Norwich City site allocations and site specific policies, which has an end date of 2026, for the same use.

Question 3

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

Response to question 3

9. The site specific delivery assumptions are justified and the deliverability of site GNLP1033BR is demonstrated in the Statement of Common Ground ([D2.6](#)) agreed with the site promoter.
10. The site has been promoted, is assessed as suitable and has been appraised as viable. The site is wholly within the ownership of the University and the SoCG indicates the landowner's intention to bring forward the development within the plan period and in accordance with the UEA Development Framework Strategy ([B25.1](#)) (2019).

Question 4

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

Response to question 4

11. The policy requirements for GNLP0133-BR are justified and effective. The policy wording has largely been taken from the Norwich City Council Local Plan allocation ([C1.5](#)) and amended as appropriate to take into account development that has

already come forward on the wider site. The policy wording takes into account of the UEA Development Framework Strategy ([B25.1](#)) which was produced following extensive consultation and careful consideration of all planning matters, the Vision and Design Document (VADD) for Earlham Hall and its environs (2011) and The Conservation Development Strategy (updated 2020). Furthermore as part of the earlier planning application process full consideration was given to all planning matters and how any negative impacts could be avoided and mitigated. It is not considered that circumstances have changed significantly and these issues are reflected in the detailed policy requirements.

12. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0133-BR this included producing a Heritage Statement ([B10.2](#)) in response to concerns from Historic England. Careful consideration was also given to the wording of criterion 2 to ensure that the policy takes account of all heritage assets that could be affected by the proposal.
13. Policy requirements are necessary to make development acceptable on the site and to mitigate any potential harm.

Site: Land north of Cow Drive (Ref GNLP0133C)

Question 1

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

Response to question 1

14. The allocation of site GNLP0133C is justified. The principle of developing GNLP0133C has been set through an existing allocation (reference: R40) and the scheme is in accordance with the UEA Development Framework Strategy ([B25.1](#)) (2019). The site has planning permission (15/00121/F and 16/00099/MA) and is already counted in the existing published 5-Year Land Supply 2019-20. Applying a ratio of 1 home to each 2.85 student bedrooms, GNLP0133-C is expected to deliver the equivalent of 143 homes (398 en-suite rooms counted at $1:2.85 = 140$) (3 studios counted at 1:1).
15. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site) and consultation comments (see Statement of Consultation [A8.1](#) and associated appendices).

Question 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?

Response to question 2

16. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Norwich site assessment booklet ([B1.2](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, planning officers from Norwich City Council, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0133C the main constraints were identified as Highways access constraints. These constraints are proposed to be mitigated through requirements in the policy (see [A2](#), pages 28 and 29).
17. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F1, F15 to F18 and G1) appraises the constraints and mitigation impacts of the proposed policy. The sustainability appraisal concludes that the outcomes of the policy requirements result in a negligible to positive impacts.
18. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices [A8.12](#) for regulation 18C and [A8.20](#) for Regulation 19). In the case of site GNLP0133C this consisted of a minor amendment to the wording relating to Highways.
19. Environmental and other constraints have been considered during the process of producing the UEA Development Framework Strategy refresh. Detailed engagement was undertaken with statutory bodies during the preparation of the University's updated Development Framework Strategy, including Norwich City Council and Historic England.
20. Site GNLP0133C also benefits from being part of an existing allocation (R40) in the adopted Norwich City site allocations and site specific policies ([C1.5](#)), which has an end date of 2026, for the same use. It benefits from extant planning consent for from a partly implemented planning permission for a 915-bed student accommodation development; the first 514-bed phase of which (Hickling House and Barton House) is complete. This allocation is for the area of the site yet to be developed.

Question 3

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

Response to question 3

21. The site specific delivery assumptions are justified and the deliverability of site GNLP1033C is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 43-44
 - Statement of Common Ground ([D2.7](#))
 - Site Delivery Table ([D1.5](#))
22. The site has been promoted, is assessed as suitable and has been appraised as viable. The site is wholly within the ownership of the University and the SoCG indicates the landowner's intention to bring forward the development within the plan period and in accordance with the UEA Development Framework Strategy ([B25.1](#)) (2019).
23. The site benefits from extant planning permission and with phase 1 complete it is anticipated that phase 2 will deliver the remaining 403 student units (143 equivalent homes) in 2025/26 as set out within the housing trajectory.

Question 4

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

Response to question 4

24. The policy requirements for GNLP0133-C are justified and effective. The policy wording has largely been taken from the Norwich City Council Local Plan allocation ([C1.5](#)) and amended as appropriate to take into account development that has already come forward on the wider site. The policy wording takes into account of the UEA Development Framework Strategy ([B25.1](#)) which was produced following extensive consultation and careful consideration of all planning matters. It also takes into consideration the extant planning permission. The previous planning application decision was made following extensive consultation and careful consideration of all planning matters.
25. Policy requirements are necessary to make development acceptable on the site and to mitigate any potential harm.

Site: Land between Suffolk Walk and Bluebell Road (Ref GNLP0133DR)

Question 1

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

Response to question 1

26. The allocation of site GNLP0133DR is justified. The site is currently allocated in the Site Allocations and Site Specific Policies Local Plan 2014 ([C1.5](#)) as a strategic reserve to accommodate the anticipated future expansion of the University (R41). The site is now proposed as a full allocation on a larger boundary in the GNLP.
27. The site is also identified within the Development Framework Strategy ([B25.1](#)) which considers that this development area has capacity to take a significant proportion of the demand for new university related floorspace and additional student accommodation over the plan period.
28. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site) and consultation comments (see Statement of Consultation [A8.1](#) and associated appendices).

Question 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?

Response to question 2

29. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Norwich site assessment booklet ([B1.2](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, planning officers from Norwich City Council, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0133DR the main constraints were identified as the potential to adversely affect the setting of the listed UEA campus buildings which are part of the original Lasdun design concept, the UEA Broad (a County Wildlife Site) and locally protected river valley landscape. There is evidence of prehistoric archaeological deposits on site. Initial highway evidence has highlighted that potential access constraints could be overcome through development. These constraints are proposed to be mitigated through requirements in the policy (see [A2](#), pages 30 to 32).
30. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F1, F19 to F22 and G1) appraises the constraints and mitigation impacts

of the proposed policy. The sustainability appraisal concludes that the outcomes of the policy requirements result in one minor negative for air quality and noise, the remainder of the outcomes have a negligible to positive impact.

31. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices [A8.12](#) for regulation 18C and [A8.20](#) for Regulation 19). In the case of site GNLP0133DR a Heritage Statement ([B10.3](#)) has been produced in response to concerns raised by Historic England and the policy wording was amended. The boundary for the allocation was also corrected following regulation 18C as advised by the site promoter.
32. Environmental and other constraints have been considered during the process of producing the UEA Development Framework Strategy refresh. Detailed engagement was undertaken with statutory bodies during the preparation of the University's updated Development Framework Strategy, including Norwich City Council and Historic England.
33. Site GNLP0133DR also benefits from inclusion of an area which is an existing allocation (R41) in the adopted Norwich City site allocations and site specific policies, which has an end date of 2026, as a strategic reserve.
34. It is considered that the policy enables the expansion of the university, whilst conserving the landscape and architectural significance of the UEA and promoting public access to open spaces.
35. It is essential that development of the site minimises impact on the river valley and enhances the setting of the listed buildings at the university. Consideration of the original Lasdun plan for a 'Village on the hill' will be important, as will design taking full account of other buildings of visual importance to the southern view of 'The Prospect', including the School of Music and Suffolk Walk. Intrusion into the valley should be limited to protect the valley's appearance and use.

Question 3

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

Response to question 3

36. The site specific delivery assumptions are justified and the deliverability of site GNLP1033DR is demonstrated in a number of different documents:
 - Statement of Common Ground ([D2.8](#))
37. The site has been promoted, is assessed as suitable and has been appraised as viable. The site is wholly within the ownership of the University and the SoCG states that the site is capable of coming forward within the plan period and in accordance with the UEA Development Framework Strategy ([B25.1](#)) (2019).

Question 4

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

Response to question 4

38. The policy requirements for GNLP0133-DR are justified and effective. Some of the policy wording has been taken from the Norwich City Council Local Plan allocation ([C1.5](#)) and amended as appropriate following discussions with Council officers. The policy wording takes into account of the UEA Development Framework Strategy ([B25.1](#)) which was produced following extensive consultation and careful consideration of all planning matters and the conclusions and recommendations set out within the UEA Conservation Development Strategy Update (2020) .
39. The policy requirements have also been amended where appropriate in response to consultation comments, including additional reference to specific heritage assets within criterion 2 to take into account concerns raised by Historic England (see Statement of Consultation [A8.1](#) and associated appendices). A heritage statement ([B10.3](#)) has also been produced to respond to Historic England's concerns.
40. The policy requirements are necessary to make development acceptable on the site and to mitigate any potential harm.

Site: Land at the UEA Grounds Depot Site, Bluebell Road (Ref GNLP0133E)

Question 1

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

Response to question 1

41. The allocation of site GNLP0133E as a strategic reserve is justified. The Development Framework Strategy ([B25.1](#)) has identified that this may be needed to meet growth needs up to 2038 and the site has been appraised as part of that process.
42. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site) and consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). The site is expected to accommodate in the region of 400 student bedrooms which is equivalent to 140 dwellings (400 en-suite rooms counted at $1:2.85 = 140$).

Question 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?

Response to question 2

43. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Norwich site assessment booklet ([B1.2](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, planning officers from Norwich City Council, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0133E the main constraints were identified as: parts of the site fall within areas at moderate to high flood risk. There are no nationally protected landscapes in the immediate vicinity although the adjoining County Wildlife Sites at the UEA Broad, The Heronry and Violet Grove has very significant local biodiversity value. The site also falls wholly within locally protected open space/river valley landscape and extension of built development into that area could compromise its open character and amenity value. Development also has the potential to harm the heritage interest and setting of listed campus buildings. Initial highway evidence has highlighted that potential access constraints could be overcome through development but that the local road network is unsuitable. These constraints are proposed to be mitigated through requirements in the policy (see [A2](#), pages 33 and 35).
44. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F1, F23 to F27 and G1) appraises the constraints and mitigation impacts of the proposed policy. The sustainability appraisal concludes that the outcomes of the policy requirements result in no negative impacts. There will be a negligible impact on air quality and noise, climate change mitigation and adaptation, biodiversity, Geodiversity and GI, landscape, natural resources, waste and contaminated land, water, and education. The remainder of the impacts are positive.
45. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices [A8.12](#) for regulation 18C and [A8.20](#) for Regulation 19). In response to local concerns site GNLP0133E the site was proposed as a strategic reserve for future development by UEA and should only be released subsequent to the completion of development of the Blackdale School site and Earlham Hall site and development of the Land between Suffolk Walk and Bluebell Road site.
46. Environmental and other constraints have been considered during the process of producing the UEA Development Framework Strategy refresh. Detailed engagement was undertaken with statutory bodies during the preparation of the University's

updated Development Framework Strategy, including Norwich City Council and Historic England.

Question 3

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

Response to question 3

47. The site specific delivery assumptions are justified and the deliverability of site GNLP1033E is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 44
 - Statement of Common Ground ([D2.9](#))
48. The site has been promoted, is assessed as suitable and has been appraised as viable. The site is wholly within the ownership of the University and the SoCG states that the site is capable of coming forward within the plan period and in accordance with the UEA Development Framework Strategy ([B25.1](#)) (2019).
49. The University of East Anglia has signed an SoCG indicating their intention to bring forward the development. The SoCG anticipates 10,500sqm of student accommodation across buildings of 2-3 storeys in height. Details are yet to be agreed through a planning consent, but the eventual scheme will be in accordance with the University's Development Framework Strategy ([B25.1](#)) that the City Council has endorsed. To be cautious, the site is being treated as 'developable' under the NPPF definition to allow ample time to progress to a planning consent, and as such is projected to build out in 2026/27. A ratio of 1 home to each 2.85 student bedrooms has been applied, and the site is expected to deliver the equivalent of 140 homes.

Question 4

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

Response to question 4

50. The policy requirements for GNLP0133-E are justified and effective. The policy wording takes into account of the UEA Development Framework Strategy ([B25.1](#)) which was produced following extensive consultation and careful consideration of all planning matters. The detailed policy requirements have also been formulated following discussions with Council officers.
51. The policy requirements are necessary to make development acceptable on the site and to mitigate any potential harm.

Issue 2: Open space / leisure allocations

Site: Bawburgh and Colney Lakes (Ref BAW2). Are the proposed site allocations below soundly based? In particular (where relevant):

Question 1

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

Response to question 1

52. The allocation of site BAW2 (see [A2](#) GNLP Sites Plan page 186 for the policy) (see also [A1](#) GNLP Strategy para 217, page 68 for reference to JCS) is justified as it is an appropriate open space allocation taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of the sustainability appraisal (see [A6.3](#) , [B1.57](#) for detailed assessment of the site) which concludes on page 2 for BAW2 that ‘This site was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)). The principle of establishing a new water-based country park in this location is already accepted. The use and management of the land for recreational use and conservation is expected to further grow over the plan period up to 2038. Therefore, the BAW2 allocation is carried forward’.
53. Account was also taken of consultation comments (see Statement of Consultation [A8.20](#) and associated Appendices). In addition the site assessment booklet Non-Residential Urban Fringe Booklet [B1.48](#) page 32 states ‘As to open space allocations, the reallocation of Colney Lakes (BAW 2) represents commitment to further establishing a new country park here’. This follows on from the Green Infrastructure Study which identifies BAW2 as a component to the GI at Yare Valley (see also GI Study and [B7.1](#) and Maps [B7.7](#)). The Topic Paper for Policy 7.1 Norwich and Urban Fringe ([D3.9](#)) also considers the site and makes comments.

Question 2

If the site was previously allocated in a Development Plan Document and hasn’t come forward as previously expected, what is the reason for this?

Response to question 2

54. BAW2 was previously allocated in the South Norfolk Local Plan (2015) ([C1.7](#)), it is currently leased to third party as a fishing lake. However, it is envisaged that the site allocation will be delivered to contribute as part of the multi-functional green infrastructure network along the Yare Valley. The Sustainability Appraisal Tables on page 2 [B1.57](#)) states that ‘This site was allocated in the 2015 South Norfolk Local Plan. The principle of establishing a new water-based country park in this location is already accepted. The use and management of the land for recreational use and

conservation is expected to further grow over the plan period up to 2038. Therefore, the BAW2 allocation is carried forward’.

Question 3

Have any constraints to development been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 3

55. The constraints to the site and any mitigation implications have been identified through consultation comments received from key bodies (See Statement of Consultation [A8.1](#) and associated appendices [A8.20 page 43](#)) . For site BAW2 the main constraints were identified as potential impacts on nature conservation, which are proposed to be mitigated through requirements in the policy for a conservation plan to protect species and to protect some areas from damage and disturbance. ‘Proposals will need to ensure that the ecological value of the County Wildlife site is retained and enhanced in areas to be opened up to the public’. (see [A2](#) page 186). This follows on from comments received from Norfolk Wildlife Trust and Historic England fully supporting the policy requirement for a conservation management plan.
56. The site has also been subject to Sustainability Appraisal (see [A6.3](#) for detailed assessment of the site particularly FSA215-F217,G15). Furthermore, Page 112 states that ‘Site BAW2 would likely help to mitigate adverse impacts on non-designated sites’, page 114 states that in terms of threats or pressures to locally designated biodiversity sites, ‘Site BAW2 is proposed for a country park and would therefore help protect the CWS’.

Question 4

Is the site available for this use?

Response to question 4

57. The Site is currently leased to Bawburgh fisheries as a fishing lake, it also provides bird watching opportunities. (see also [B7.1](#) and [B7.7](#) Green Infrastructure Study and Maps) which identifies BAW2 as a component to the GI at Yare Valley.

Question 5

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

Response to question 5

58. The policy requirements for site BAW2 are justified and effective having been developed through consultations, the site assessment and sustainability appraisal process. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation and associated appendices [A8.20](#)). In the case of BAW2 see page 43 for comments received from Norfolk Wildlife Trust and Historic England fully supporting the policy requirement for a conservation management plan.

Site: Land northeast of Reepham Road, Hellesdon (Ref HEL4/GNLP1019). Are the proposed site allocations below soundly based? In particular (where relevant):

Question 1

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

Response to question 1

59. The allocation of the site HEL4/GNLP1019 (see page 222 [A2](#) for the policy) is justified and supported by evidence. The policy wording has been taken from the Broadland Local Plan (2016) ([C1.2](#)) which has an end date of 2026 whilst taking account the need for additional recreational open space at Hellesdon to meet local need not strategic needs. Its inclusion as an allocation takes account of the Broadland Development Management DPD [C1.3](#) (which is not being superseded by the GNLP) – (Policy RL1 provision of formal open space) which states that *‘the provision of formal recreation should equate to at least 1.68 ha per 1,000 population’ and the provision of children play space should equate to at least 0.34 ha per 1000 population’*.
60. Therefore, based on a population of 11,463 the target for recreational open space provision for adults is 19.25 ha and 3.8 ha for children play, and the current provision at Hellesdon based Broadland’s open space audit update (2020) and Council monitoring Hellesdon has a deficit of -14 ha adult sport/-2.68 ha children play. (See appendix 1 of this document for an Evidence Note to support HEL4). As a result, the reallocation of HEL4 site is sought to improve the current provision, as per the requests for provision from the Parish Council which would give 17.86 ha (including children play) resulting in 1.55 ha per 1,000 population.

61. In addition, the sustainability appraisal (see [A6.3](#) , [B1.57](#) for detail assessment of the site), particularly F296 to F297 and G16 also references the need for additional open space at Hellesdon and thus retaining the existing open space allocation is considered appropriate. Other considerations included consultation comments (see Statement of Consultation and associated appendices [A8.20](#),. Therefore, it has been considered as the most suitable site in Hellesdon for recreational open space to be carried forward see Non- Residential Urban Fringe Booklet [B1.48](#).

Question 2

If the site was previously allocated in a Development Plan Document and hasn't come forward as previously expected, what is the reason for this?

Response to question 2

62. The availability of site HEL4/GNLP1019 is confirmed through a Statement of Common Ground / Delivery Statement agreed with the Hellesdon Parish Council ([D2.70](#)), at present part of the site is leased to Hellesdon Parish Council for open space. It is expected that the site will come forward within the time period of this local plan up to 2038.

Question 3

Have any constraints to development been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 3

63. The Sustainability Appraisal (see [A6.3](#) [B1.57](#) for detailed assessments of the site, particularly F296-297, G16) states 'GNLP1019 reiterates the proposal of existing allocation HEL4. The existing allocation was made in the last Broadland Local Plan based on the need for additional recreational open space in Hellesdon. Retaining the existing open space allocation is considered appropriate. However, it is noted that the land is also promoted for a large-scale urban extension (GNLP0332R). This larger site is not allocated. GNLP0332R is constrained by its location, such its proximity to the Airport, and is not necessary to meet the housing requirement set out in the Part 1 GNLP Strategy' documented in the site assessment booklet for Horsford ([B1.39](#).) In reference to open space it also states, 'the site would be expected to contribute towards Greater Norwich's network of multi-functional green infrastructure, and as such, would provide access to outdoor space with opportunities for exercise and recreation. A minor positive impact on health would therefore be expected'.

64. Consultation comments were also taken into account (see Statement of Consultation and associated appendices [A8.20](#)). In the case of site HEL4/GNLP1019 the request by Hellesdon Parish Council to carry forward the site allocation due to the current lack of recreational open space requirements was considered. In addition, the request for the site to be considered for housing as part of a larger site is documented and discounted in the site assessment booklet for Horsford ([B1.39](#)). Furthermore, as the site is underlain by safeguarded minerals resources policy CS16 Norfolk Minerals and Waste Core Strategy applies. (see [A2](#), page 222)

Question 4

Is the site available for this use?

Response to question 4

65. The availability of site HEL4/GNLP1019 is confirmed through a Statement of Common Ground/Delivery statement agreed with the Hellesdon Parish Council ([D2.70](#)), which states that only part of the site is utilised for recreational open space which is leased to Hellesdon Parish Council.

Question 5

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

Response to question 5

66. The policy requirements for Site HEL4/GNLP1019 are justified and effective. The policy wording has been taken from the Broadland Local Plan allocation ([C1.2](#)) and amended as appropriate following discussion with district colleagues and consultation. An additional policy requirement has been added to reflect the need to safeguard mineral resources.

Site: Land west of Poppyfields (Ref HET 3). Are the proposed site allocations below soundly based? In particular (where relevant):

Question 1

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

Response to question 1

67. The allocation of site HET3 (see [A2](#), pages 341 and 342 for the policy) is justified as an appropriate open space allocation. This site was allocated in the 2015 South

Norfolk Local Plan ([C1.7](#)), where the principle of informal open space in this location is already accepted. HET3 is intended to provide important open space requirements for the larger scale growth planned in the area (HET1 and HET2). It is important to retain and safe guard this land for informal open space, since it is expected that development will take place within the time period of this local plan up to 2038.

Question 2

If the site was previously allocated in a Development Plan Document and hasn't come forward as previously expected, what is the reason for this?

Response to question 2

68. Site HET3 was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)) which has an end date of 2026. HET3 has yet to be developed at the base date of the GNLP and does not have planning permission, but the principle of development on the site has already been accepted. Since it is expected that development will take place within the time period of this local plan up to 2038, the allocation has been carried forward (see page 341 of [A2](#) for the carried forward policy).
69. This site has not been brought forward as part of the current permissions on the HET 1 allocation, however, the proposed increase in numbers on both HET 1 and HET 2 mean that additional supporting infrastructure, including green infrastructure, may be necessary. It is therefore proposed to carry forward the existing allocation HET 3, recognising the public benefit in providing informal open space, and also to safeguard the archaeological interest relating to the land.

Question 3

Have any constraints to development been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 3

70. This site lies to the south-west of HET 1 Policy area, and to the west of the Poppyfields development, and is underlain by a significant archaeological site. The Historic Environment Service has advised that informal open space would be the preferred use here. Permission has been granted to use part of the site as an access road to HET 1 and this should minimise impact on the archaeological site. The remainder of the site should remain open and undeveloped to protect the archaeological remains.

Question 4

Is the site available for this use?

Response to question 4

71. It is understood that HET3 is available.

Question 5

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

Response to question 5

72. The policy requirements for site HET3 are justified and effective. The policy wording has been taken from the South Norfolk Local Plan allocation ([C1.7](#)) and amended as appropriate following discussion with district colleagues and consultation.

Site: Land north of Berryfields, Brundall (BRU2). Are the proposed site allocations below soundly based? In particular (where relevant):

Question 1

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

Response to question 1

73. The allocation of site BRU2 (see [A2](#), pages 329 and 330 for the policy) is justified and it is intended to carry this allocation forward, recognising the public benefit in providing informal open space. There is a shortage of recreational space to meet the existing needs in Brundall and this was to be provided for through the two allocations (BRU2 and BRU3) that are carried forward from the preceding Local Plan.

74. Both sites now have planning permissions for residential development that include the provision of open space that exceeds the normal requirements of a residential development, and so would contribute to the delivery of open space provision to meet the needs of the community, albeit in an alternative form than that in the allocations. However, the delivery of the residential developments, and the open space provision within them, is not guaranteed. Therefore, at this time there remains an open space shortage and so the continued open space allocation is justified.

Question 2

If the site was previously allocated in a Development Plan Document and hasn't come forward as previously expected, what is the reason for this?

Response to question 2

75. This site was allocated in the 2016 Broadland Local Plan ([C1.2](#)) and it is intended to carry this allocation forward. BRU2 now has a permission for 155 dwellings and a supermarket which includes alternative provision for recreation (reference: 20161483). These dwellings have been counted in the plan's commitment figures. The open space allocation has been carried forward in the event that planning permission 20161483 is not implemented.

Question 3

Have any constraints to development been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 3

76. For BRU2 the main constraint identified is in developing the site for residential development. However, it is expected that this development will include the provision of open space that exceeds the normal requirements of a residential development and therefore will contribute to the provision of open space, albeit in an alternative form than that in the allocation.
77. It is considered appropriate to carry forward this allocation as open space in the event that the development is not implemented and that the allocation would safeguard the land for open space.

Question 4

Is the site available for this use?

Response to question 4

78. BRU2 has planning permission for residential development and is being progressed by developer, Norfolk Homes. Construction is anticipated to start in 2021/22.

Question 5

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

Response to question 5

79. The policy requirements for site BRU2 are justified and effective. The policy wording has been taken from the Broadland Local Plan allocation ([C1.2](#)) and amended as appropriate following discussion with district colleagues and consultation.

Site: Land east of the Memorial Hall, Brundall (BRU3). Are the proposed site allocations below soundly based? In particular (where relevant):

Question 1

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

Response to question 1

80. The allocation of site BRU3 (see [A2](#), pages 331 and 332 for the policy) is justified and it is intended to carry this allocation forward, recognising the public benefit in providing informal open space. There is a shortage of recreational space to meet the existing needs in Brundall and this was to be provided for through the two allocations (BRU2 and BRU3) that are carried forward from the preceding Local Plan.
81. Both sites now have planning permissions for residential development that include the provision of open space that exceeds the normal requirements of a residential development, and so would contribute to the delivery of open space provision to meet the needs of the community, albeit in an alternative form than that in the allocations. However, the delivery of the residential developments, and the open space provision within them, is not guaranteed. Therefore, at this time there remains an open space shortage and so the continued open space allocation is justified.

Question 2

If the site was previously allocated in a Development Plan Document and hasn't come forward as previously expected, what is the reason for this?

Response to question 2

82. The site was allocated in the 2016 Broadland Local Plan ([C1.2](#)) and it is intended to carry this allocation forward. BRU3 now has planning permission, granted at appeal, for up to 170 dwellings with alternative provision for open space (reference 20171386). These dwellings have not been counted in the plan's commitment figures at this stage as the appeal decision was received after the 31st March 2020

Question 3

Have any constraints to development been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 3

83. For BRU3 the main constraint identified is in developing the site for residential development. However, it is expected that this development will include the provision

of open space that exceeds the normal requirements of a residential development and therefore will contribute to the provision of open space, albeit in an alternative form than that in the allocation.

84. It is considered appropriate to carry forward this allocation as open space in the event that the development is not implemented, and that the allocation would safeguard the land for open space.

Question 4

Is the site available for this use?

Response to question 4

85. BRU3 has planning permission for residential development.

Question 5

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

Response to question 5

86. The policy requirements for site BRU3 are justified and effective. The policy wording has been taken from the Broadland Local Plan allocation ([C1.2](#)) and amended as appropriate following discussion with district colleagues and consultation.

Issue 3: Policy COS5/GNLP2074: Royal Norfolk Showground, Costessey Is the proposed site allocation soundly based? In particular:

Question 1

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

Response to question 1

87. The policy requirements for COS5/GNLP2074 are justified and effective. The policy wording has been taken from the South Norfolk Local Plan (2015) ([C1.7](#)) and amended as appropriate following discussion with district colleagues and consultation. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and [A8.20](#) and associated appendices and the Non- Residential Urban Fringe site assessment booklet ([B1.48](#)).

88. The Sustainability Appraisal (see [A6.3](#)) ([B1.57](#)) for detailed assessments of the site, particularly F256-261, G16) also identified, the well- established and unique venue as well as the site boundary area is unchanged, except for a small area east of Long Lane and the land that is now the golf centre. On this basis, with minor modifications, the policy for control of uses at the Norfolk Showground is carried forward.

Issue 4: Other area-based policies

Site: Policy COS 4: Redevelopment of existing uses within the Costessey Longwater Development Boundary. Are the proposed area policies soundly based? In particular:

Question 1

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

Response to question 1

89. Site COS 4 was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)) which has an end date of 2026. Retention of the development boundary and Policy to guide the uses permitted is considered justified. Policy COS 4 protects the commercial activities in this location and ensures the range of uses taking place at Longwater are compatible with each other. the allocation has been carried forward (see page 192-193 of [A2](#) for the carried forward policy).

90. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and [A8.20](#) associated appendices.

91. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F250-F252, G16) also identified this as 'the settlement boundary for the Longwater Employment Area is carried forward from the last South Norfolk Local Plan. Retention of the development boundary and policy to guide the uses permitted is considered justified. Therefore, the COS 4 allocation is carried forward'. Overall, with the Non – residential urban fringe Site Assessment Booklet ([B1.48](#)) confirm the employment site has been assessed as the most suitable and deliverable to carry forward.

Site: Policy COL 3: Redevelopment of existing hospital and science park uses within the Colney Development Boundary. Are the proposed area policies soundly based? In particular:

Question 1

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

Response to question 1

92. Site COL 3 was allocated in the 2015 South Norfolk Local Plan ([C1.7](#)) which has an end date of 2026. The policy seeks to guide the range of uses permitted. Retention of the development boundary and Policy to guide the uses permitted is considered justified. Policy COL 3 (See page 181-182 of [A2](#)) protects the science and hospital activities in this location and ensures the range of uses taking place at Norwich

Research Park are compatible with each other. Overall, with the Non – residential urban fringe Site Assessment Booklet ([B1.48](#)) confirm the employment site has been assessed as the most suitable and deliverable to carry forward.

Site: Policy HETHEL 1: Restriction of employment uses at Hethel. Are the proposed area policies soundly based? In particular:

Question 1

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

Response to question 1

93. The settlement boundary of HETHEL 1 was allocated in the 2015 South Norfolk Site Specific Allocations ([C1.7](#)), and restrictions put on the forms of development here remain to be justified and effective. This is because Hethel is a key location for the local economy, it is most notably home to Lotus Cars, and it presents a unique opportunity for clustering advanced engineering and technology-based businesses. As well as that a Statement of Common Ground has been provided by the owners Hethel Properties Ltd ([D2.89](#)). This document is supportive of the approach being taken to HETHEL 1 and contains reference to how Hethel will provide “high-tech, high-skilled jobs”.

Appendix 1 - Evidence Note for the Justification for Reallocation for Site Ref HEL4 – Recreational Open Space Allocation- Hellesdon

Introduction

This note is intended to set out the evidence for the planning policy requirements for Recreational Open Space, specifically at Hellesdon, as justification for the reallocation of HEL4 Approx. 11.9 ha. for Recreational Open Space located at land North East of Reepham Road, Hellesdon.

Calculation of requirement for recreational open space

The requirements for recreational open space are set out in the Broadland Development Management Policies DPD (2015). Policy RL1 (Provision of formal recreational open space) states that *'the provision of formal recreation should equate to at least 1.68 ha per 1,000 population' and the provision of children play space should equate to at least 0.34 ha per 1000 population'*. Therefore, based on a population of 11,463 the target for recreational open space provision for adults is 19.25 ha and 3.8 ha for children play. (see Table 1 in Appendix 1).

However, based on an extract from the Broadland Open Space Audit (internal working document based on and updated from a PPG17 Audit contained at Appendix 1, the current provision for recreational open space in Hellesdon for adults is 4.84 ha equivalent to 0.43 per 1,000 population (excluding the privately owned recreational land at Heath Crescent that is currently unused) and the provision for Children Play Space is 1.12 ha equivalent to 0.09 per 1,000 population. This equates to an overall deficit of -14.41ha Adult Sport / -2.68 ha Children Play provision at Hellesdon. As a result, the reallocation of HEL4 site is sought to improve the current provision, which would give 17.86 ha (including children play) resulting in 1.55 ha per 1,000 population.

Hellesdon Parish Council Support

Hellesdon Parish Council support the allocation of the site for recreational use, and to demonstrate a reasonable prospect of delivery of this site have submitted to the GNLP a Statement of Common Ground/ Delivery Statement; and also, a Sport and Open Space Needs assessment for Hellesdon produced by Ploszajski Lynch Consulting Ltd. These are available in the GNLP examination webpage section D2 (D2.70.1)

Planning Policy

Relevant planning policy extracts in support of this allocation are shown below.

Broadland Development Management DPD (Adopted) (2015) ***Policy RL1 – Provision of formal recreational space***

*Residential development consisting of five dwellings or more will be expected to make adequate contributions and subsequent management arrangement for recreation. The provision of formal recreation should equate to at least **1.68 ha per 1,000 population** and the provision of children's play space should equate to at least **0.34 ha per 1,000 population**.*

The Greater Norwich Local Plan (Submission 2021)

Policy 2 – Sustainable Communities

The explanatory text to the policy, at Table 8, sets out key Issues to be addressed by Policy 2:

“Issue no. 1 Access to services and facilities: The provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling also helps to support healthy lifestyles. In this respect, regard should be had to Sport England's Active Design document. Strategic infrastructure is provided for through policy 4.”

Hellesdon Neighbourhood Plan (2017-2026)

“Project 1: Enhanced Parks and Open Spaces

The Parish Council will seek to improve the quality and diversity of existing parks and open spaces throughout Hellesdon. This would include:

- *Securing the use of Jarrold's Sport Ground / Heath Crescent for the local community*
- *Improving signage and entrances to raise awareness and use*
- *Reviewing the function of existing parks to ensure they meet with residents needs and aspirations*
- *Making better use of smaller pieces of incidental greenspace, for example through the provision of play equipment and seating for individual neighbourhoods*
- *Supporting community groups to come forward to create and manage their own pocket parks*
- *Exploring opportunities for 'edible parks' growing fruit and produce to increase awareness and promote healthy lifestyles”.*

PPG17 Open Spaces Indoor Sports and Community Recreation Assessment Audit (2007) Strategic Leisure Limited.

Broadland District Council commissioned a PPG17 Audit (2007) produced by Strategic Leisure Limited (SSL) updated since.

Greater Norwich Playing Pitch Strategy (2014)–

This Strategy and Action Plan provide suggestions on a Strategic basis; however, it does not consider local need.

Great Norwich Playing Pitch Strategy (currently under review)

The Greater Norwich Growth Board identifies and secures funding for a range of projects to benefit those living and working in the Greater Norwich area. It is currently working on a new sports and physical activity strategy (match funded by Sport England) which will pave the way for the delivery of new facilities to support healthier lifestyles.

Conclusion

The above demonstrates that there is a significant unmet need for recreational land in Hellesdon. Existing national planning policy, reflected in existing and proposed local planning policy, is that the recreational needs of communities should be planned for. Therefore, the proposed allocation under HEL4i is justified and in accordance with national and local planning policy.

Appendix 1: Broadland Open Space Audit – Hellesdon – Update 2020

pop 2020 update	Site name / address	owner	Typology	Quality	Amenity space	Allots 0.16ha per 1,000 pop	Green Infrastructure 4ha per 1000 pop	Play areas 0.34ha per 1000 pop	Sport 1.68ha per 1000 pop	Notes
11,463*	Hellesdon Recreation Ground	PC	Recreation Ground	Good				0.56	4.84	Hellesdon 5.4ha 2 x adult football, 1 x Junior bowls, tennis x 3 CLOSED 2017
	Meadow Way Park	PC	Play area	Good				0.56		
	Heath Crescent Jarrolds Sports Grd	PR	Sports Ground			-			2.49	
	Plantation Road		Amenity		0.12					
	Loxwood		Amenity		0.05					
	Prince Andrew Close		Amenity		0.05					
	Bush Road	PC	Allotments	Excellent		2.96				
	Mountfield Road B&Q	PC	Park		2.01					
11,463	TOTAL Provision				2.23	2.96	-	1.12	4.84	
	Parish Target					1.83	45.85	3.8	19.25	
	Surplus/ Deficit					1.13	- 45.85	-2.68	-14.41	
	Total Provision per 1,000 pop					0.25	0	0.09	0.43	

*Source: Norfolk Insight Total Population 11,463 (2020)