

HEARING STATEMENT

GREATER NORWICH LOCAL PLAN (PART 2)

MATTER 14

ISSUE 1

FOR THE UNIVERSITY OF EAST ANGLIA

Quality Assurance

Site name:	Greater Norwich Local Plan Examination (Part 2)
Client name:	University of East Anglia
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Table of Contents

1.0	Introduction	1
2.0	Matter 14, Issue 1 Questions	2

1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Bidwells LLP on behalf of the University of East Anglia (UEA), in support of representations made to the Greater Norwich Local Plan.
- 1.2 This Statement provides the UEA's response to **Matter 14, Issue 1: University Related Allocations** of the Inspector's 'Greater Norwich Local Plan Inspectors Matters Issues and Questions (March 2022 Sessions)' and asks whether the proposed site allocations within the confines of the University's campus are soundly based. Four specific questions are raised, which are addressed in turn in the following sections of this Statement.
- 1.3 The Statement is intended to assist the Inspector's consideration of the soundness of the Plan and will form the basis of the discussion at the Examination hearing session and is not intended to repeat representations made at the Regulation 19 stage of the plan's preparation.

2.0 Matter 14, Issue 1 Questions

Question 1

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

- 2.1 The proposed allocations at the UEA campus have been justified through the preparation of the Development Framework Strategy (DFS). The starting point of the updated 2019 iteration of the DFS was a study of the University's anticipated growth forecast and translating the projected increase in student numbers into academic and non-academic floorspace and land requirements.
- 2.2 A similar exercise underpinned the 2010 DFS, which identified that there was a requirement for an additional 55,000m² (NIA) of floorspace to accommodate the University's projected growth in the period from 2010 to 2030. This evidence went on to inform the current development plan. In summary, approximately 32,000m² of new floorspace has been delivered by the UEA since the preparation of the 2010 DFS, against the target of 55,000m² (NIA). All Development Areas identified in the 2010 DFS, with the exception of land between Suffolk Walk and Bluebell Road and part of the Earlham Hall site, have already been delivered.
- 2.3 The 2019 DFS explains that the University anticipates an increase in student numbers from 17,195 students in 2016/17 to 22,000 by 2036. To accommodate this growth, it was identified that approximately 62,000m² (GIA) of additional academic, student and student welfare accommodation would be required. Therefore, making assumptions around appropriate development densities, based upon the grant of planning permissions for development of a similar nature at the UEA since 2010, the 2019 DFS identified that approximately 7.2ha of land for development is required to 2036 to accommodate the required growth.
- 2.4 With this baseline land requirement identified, a detailed site evaluation exercise was undertaken in partnership with Norwich City Council, the GNLP Team and Historic England to identify the most appropriate sites within the UEA campus to accommodate the 62,000m² (GIA) floorspace requirement. This exercise produced a shortlist of preferred sites within the campus, before initial capacity studies were undertaken to demonstrate whether the preferred sites were suitable, viable and deliverable for the floorspace requirements identified.
- 2.5 The preferred sites were subsequently carried into the draft GNLP as proposed site allocations, to contribute towards meeting the University's growth requirements. It is important to note that even with the allocation of the following site's the identified need can still not be met in full on campus during the plan period, due to the challenging and sensitive nature of the campus environment. Therefore, some continued reliance on off-campus purpose-built student accommodation elsewhere within the City will be required throughout the plan period.

GNLP0133-BR: Land Adjoining the Enterprise Centre at Earlham Hall

- 2.6 The initial scoring matrix identified the Earlham Hall site as one of the most suitable locations for development on campus. The initial capacity study identified that the site could indicatively accommodate up to 5,000m² of academic floorspace in the plan period. The site is also allocated in the adopted Development Plan (ref: R39), and whilst some of the allocation has already been

delivered, the continued allocation of the site in the GNLP to enable conclusion of development around Earham Hall is justified.

GNLP0133C: Land North of Cow Drive

- 2.7 As this site benefits from extant planning permission, it was not considered as part of the site evaluation process (ref: 15/00121/F). This site is also allocated in the adopted Development Plan (ref: R40).
- 2.8 To date, Phase 1 of the approved development has been completed, with the delivery of Hickling House and Barton House, providing 514 student bedrooms. Delivery of the remainder of the planning permission (Phase 2) is anticipated within the plan period to 2038, so retention of the site allocation in the GNLP is considered justified to align with the extant planning permission.

GNLP0133DR: Land Between Suffolk Walk and Bluebell Road

- 2.9 The scoring matrix, which informed DFS 2019, identified this site as the most suitable location on campus to accommodate most of the growth requirement for the University within the plan period. Most of the site is allocated in the adopted Development Plan as a strategic reserve site, which would only come forward once other development opportunities within the campus had been completed. The DFS (2019) identified that this site, alongside additional land to the north, is now required to meet the University's growth needs throughout the plan period, and could provide approximately 29,000m² of academic and non-academic floorspace. Consequently, the site is no longer seen as a reserve site, but instead proposed for allocation to accommodate a significant proportion of the University's growth during the plan period.
- 2.10 The DFS (2019) provides the necessary evidence and justification to enable the development of this site now. The initial capacity study sets out an indicative vision for the site, with building heights ranging from 2-6 storeys set against the heritage context of the listed Ziggurats which range between 7-8 storeys, which is considered a proportionate and indicative response to the site constraints.

GNLP0133E: UEA Grounds Depot Site

- 2.11 The scoring matrix, which informed DFS 2019, identified this site as a sequentially preferable development site within the campus for residential (student) accommodation. The initial capacity study identified that the site could be developed to accommodate 10,500sqm of floorspace, so its inclusion within the GNLP as a strategic reserve site is considered justified and supported by the DFS (2019) evidence base.

Summary

- 2.12 The DFS acknowledges that the sites identified above cannot deliver the University's full floorspace requirements for the plan period. Consequently, the UEA will need to fulfil its surplus requirements in student accommodation, by off-campus provision, delivered by others, as the site constraints of the campus are such, that priority should be given to academic floorspace, to retain its founding principles of a single, compact campus.

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?

- 2.13 As discussed above, a site evaluation exercise was undertaken to inform the selection of appropriate development sites in the 2019 DFS. This required a comprehensive evaluation of planning constraints on a variety of potential development sites on campus, and a scoring matrix was formulated to evaluate the sites in a transparent manner. The scoring approach was prepared and evaluated in consultation with key stakeholders, including Norwich City Council and the GNLP Team. The final scoring matrix is included within the DFS (2019) for reference. This enabled less suitable sites to be discounted from further consideration early in the revised DFS process, and preferred sites to be taken forward for further evaluation in the form of initial floorspace capacity studies, prior to their proposed allocation in the GNLP. The proposed site allocations were assessed accordingly, taking account of their environmental/infrastructure constraints, as follows:

GNLP0133-BR: Land Adjoining the Enterprise Centre at Earlham Hall

- 2.14 The scoring exercise identified that the key constraint to the delivery of this site is the adjoining heritage assets at Earlham Hall. The initial capacity study therefore identified that development of no more than two storeys would be appropriate, to minimise impacts upon the heritage assets. This restriction has been carried forward into the proposed site allocation, which is considered an appropriate response to address environmental constraints at the site. In view that part of the existing allocation has already been completed with the refurbishment of Earlham Hall and the construction of the Enterprise Centre, sufficient infrastructure already exists within the vicinity of the proposed allocation site to plug into the wider University infrastructure.

GNLP0133C: Land North of Cow Drive

- 2.15 Whilst this site was excluded from the site evaluation process for DFS 2019, as it benefits from an extant planning permission, it is considered that there are no environmental constraints that will prevent the delivery of the Phase 2 element of the extant planning permission in the plan period, or an alternative form of development of similar scale and nature.

GNLP0133DR: Land Between Suffolk Walk and Bluebell Road

- 2.16 Through the site evaluation exercise, five key themes to consider in the development of this site were established (page 76 of the DFS 2019):
1. The setting of The Prospect, a man-made spoil heap which forms a distinct local landscape feature within the eastern part of the campus;
 2. The sloping topography of the site. There is a fall in the land over the length of the site from 33m AOD in the north-east to 9m AOD in the south (not including The Prospect);
 3. The setting of the adjacent listed buildings;
 4. The need to define the southern edge of the campus; and
 5. Protecting existing planting where appropriate.

- 2.17 The proposed site allocation in the emerging GNLP addresses these themes, requiring development of the site to *“take account of its sensitive location adjoining the University Broad, protect the visual setting of the south elevations of “The Prospect” and respect the heritage significance and setting of the listed buildings within the campus”* while also requiring development to retain and enhance existing landscape features.
- 2.18 It is considered that appropriate mitigation can be factored into the development of the site to address these key themes, as demonstrated through the initial capacity study undertaken as part of the 2019 DFS. This explored how the site could be developed whilst respecting the setting of landscape and heritage features and having regard to Lasdun’s original architectural vision for this part of the campus.

GNLP0133E: UEA Grounds Depot Site

- 2.19 The site evaluation exercise identified that, due to the site’s topography and landscape character, this site is relatively contained and enclosed when viewed from outside the University from Bluebell Road. Development of the site also offers the potential to improve pedestrian/public access to the wider green infrastructure within the locality and ownership of the University. Initial capacity studies identified that the site could accommodate development of 2-3 storeys in height.

Question 3

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

- 2.20 The availability, viability and deliverability of each proposed site allocation within the UEA campus has been assessed.

GNL0133-BR: Land Adjoining the Enterprise Centre at Earlham Hall

- 2.21 Firstly, GNL0133-BR is wholly within the land ownership of the UEA, so the site is readily available for development. The development parameters set out in the proposed site allocation are considered both deliverable and viable. Previous proposals for the site, which were the subject of a now lapsed outline planning consent were not taken forward due to the unviable nature of some subterranean elements of the scheme, as explained in the DFS 2019. GNL0133-DR and the drafting of the allocation has had regard to these previous viability concerns, and the anticipated capacity of the site has assumed no sub-terranean development. Consequently, the allocation as written is considered viable and deliverable within the plan period.

GNL0133C: Land North of Cow Drive

- 2.22 The site is wholly within the land ownership of the UEA, so the site is readily available for development.
- 2.23 The site has extant full planning permission for student accommodation, comprising 915 bedrooms (ref: 15/00121/F). To date, Phase 1 of the approved development has been completed, with the delivery of Hickling House and Barton House, providing 514 student bedrooms. Delivery of the remainder of the planning permission (Phase 2) is anticipated within the plan period to 2038, so the site allocation is considered both viable and deliverable.

GNL0133DR: Land Between Suffolk Walk and Bluebell Road

- 2.24 The site is wholly within the land ownership of the UEA, so the site is readily available for development.
- 2.25 The broad parameters of a development proposal at the site have been established within the existing site allocation (R41) and embellished by the University's DFS (2019). The DFS anticipates that the site can deliver at least 29,000sqm of University-related development, with building heights ranging from 2-6 storeys set against a context of the listed Ziggurats which range between 7-8 storeys. These parameters will inform the preparation of a future planning application, and they are considered both viable and deliverable in the plan period to 2038.

GNL0133E: UEA Grounds Depot Site

- 2.26 The site is wholly within the land ownership of the UEA, so the site is readily available for development.

2.27 The broad parameters of a development proposal at the site have been established within the DFS (2019), which anticipates that the site can deliver approximately 10,500sqm of student accommodation floorspace across buildings comprising 2-3 storeys in height, positively responding to the enclosed landscape setting and topography of the site. While the final scale of development would be determined through further detailed design and assessment work which would support any future planning application on the site, the policy requirements of GNLP0133-E align with the vision of the site established within the DFS (2019). Therefore, the site is considered viable and deliverable in the period to 2038.

Question 4

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

- 2.28 It is considered that the detailed policy requirements for the UEA site allocations are justified and effective, as detailed below:

GNLP0133-BR: Land Adjoining the Enterprise Centre at Earlham Hall

- 2.29 Firstly, GNLP0133-BR carries forward much of the wording and requirements from adopted policy (ref: R39). The requirement for low-rise development (section 3 of the policy) is considered justified and in accordance with the 2019 DFS.

GNLP0133C: Land North of Cow Drive

- 2.30 Similarly, the policy requirements of adopted policy R40 have been carried forward into GNLP0133-C to support the delivery of the extant planning permission at the site (ref: 15/00121/F). The requirements are therefore considered to be justified and effective.

GNLP0133-DR: Land Between Suffolk Walk & Bluebell Road

- 2.31 The policy requirements for GNLP0133-DR are considered effective and carry forward key elements of the adopted policy R41. In particular, the requirements to account for the sensitive location of the site in relation to heritage assets, and to have regard to Lasdun's original architectural vision for the site are considered justified and effective. The proposed policy requirement to access the site via the existing university site only is also considered justified and effective, as an alternative vehicular access from Bluebell Road to serve this site would not be considered feasible by the University.

GNLP0133-E: Land at the UEA Grounds Depot

- 2.32 The requirement to hold GNLP0133-E as a strategic reserve site, which should only be released subsequent to the completion of GNLP0133-BR, GNLP0133-C and GNLP0133-DR site allocations is considered justified and effective. This site is located to the south of GNLP0133-DR, so it is considered appropriate to withhold development of this site until the development context to the north has been extended southwards towards this site. The requirement to limit development to 2-3 storeys in height is also considered justified and effective, in accordance with the 2019 DFS.
- 2.33 It is important to note that DFS 2019 concludes that all of the University's land use requirements will not be met by the proposed allocations to 2038, and consequently it is highly likely that this strategic reserve site will be required towards the end of the plan period.

