

# **Greater Norwich Local Plan Hearing Statement**

**Matter 9 – Residential based  
allocations – new sites without  
planning permission that are allocated  
for more than 500 dwellings**

## 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](http://www.gnlp.org.uk)

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

## **Issue 1: Anglia Square (Ref GNLP0506) Is the proposed site allocation soundly based? In particular:**

### **Question 1**

Is an assumed site capacity of 800 dwellings justified? How does this relate to the recent refusal of planning permission by the Secretary of state for a higher density mixed use scheme (Ref APP/G2625/V/19/3225505)?

### **Response to question 1**

1. The site capacity of 800 dwellings has had regard to the decision of the Secretary of state (SoS) to refuse a previously proposed scheme for Anglia Square.
2. The call-in scheme was for mixed development comprising; 1209-1250 dwellings, 11,000sqm flexible commercial floorspace, 200 bed hotel, cinema, 600 space public multi-storey car park, 910 space residential decked car parking and 40 spaces for operational car parking. The SoS although recognising regeneration of Anglia Square as an important strategic objective and the economic benefits that such a regeneration could bring, considered the call-in scheme to have a number of design flaws and to result in less-than-substantial harm to the setting of a number of listed buildings, in two cases towards the upper end of the scale. In terms of design flaws, he highlighted: the excessive size of the tower (20 storey) in relation to its context; the prevailing character, scale, bulk and massing of 7-10 storey blocks at the edge of the development; and a sub-optimal design solution which resulted in large quantities of single aspect dwellings and access corridors which would not have natural light.
3. Following the call-in decision careful consideration was given to the reasons for refusal, the shared conclusions of the SoS and the Inspector and development viability, which is known to challenge this site. Comprehensive regeneration of Anglia Square remains a strategic priority for Norwich and formulating a policy position in full knowledge of the planning history of the site and of known barriers to development is necessary if this is going to be achieved. The SoS agreed with the Inspector that the particular circumstances of the site justified the call-in scheme's housing mix (type and size). It remains appropriate to consider this designated large district centre site as suitable for a mix of housing which includes a significant proportion of flatted units. The location of the site within the city centre fronting a major bus route, supports a development approach which optimises sustainable housing growth. In the context of the SoS conclusions the scale, form and character of that development should have full regard to the historic environment and the core principles of good design. Policy GNLP0506 relates to a larger site than the refused application. The 800 dwelling figure represents a 36% reduction in the call-in scheme dwelling figure. The dwelling figure for the larger site provides the scope for a scheme which delivers a significant amount of town centre floorspace at ground level to support the large district centre and large number of homes. Compared to the call-in scheme, these homes would be capable of being delivered in substantially lower blocks with a smaller foot-print, in a form of development better related to the surrounding area and that would be

significantly less visible within the wider City centre conservation area. It is in this context that the housing figure has been derived.

4. In early 2021, following the refusal of their previous scheme by the SoS, Weston Homes commenced pre-application discussions with Norwich city council. These discussions remain on going. In parallel with these discussions Weston Homes have undertaken multiple stages of stakeholder and community engagement. The pre-application process has included an evolving masterplan for the whole site and detailed proposals for the first two phases of development. Joint meetings have taken place with Historic England and Norwich city council officers have attended a series of design review panel meetings. Independent design review is being undertaken by Design Southeast who have also facilitated a programme of community review sessions. The current iteration of the pre-application scheme has recently been subject to a third round of Public and Stakeholder Engagement ([link here](#)). The scheme includes a mixed-use development comprising: substantial demolition of the existing buildings; around 1060 dwellings; 6040sqm flexible commercial floorspace; 425 residential parking spaces; and public realm enhancements. The scheme comprises multiple blocks with height on the edges of the site ranging from 4 – 7 storeys. No building on the site exceeds 8 storeys. A planning application is expected in the last week of March 2022. The application will be assessed in the context of appropriate weight being given to current and emerging development plan policies, the NPPF and other material considerations including the SoS previous decision.

## Question 2

Would a scheme for around 800 dwellings be viable and deliverable?

### Response to question 2

5. Development viability is known to be a significant factor in relation to development of this site.
6. Apart from Surrey chapel and adjacent buildings on Pitt Street, all other buildings on the site are identified as negative buildings in the Anglia Square conservation area appraisal. Sovereign House and the multi-storey car park are highly visible symbols of degradation. Demolition costs are predicted to be high, further complicated and compounded by the desirability to maintain an operational shopping centre throughout construction. In common with other brownfield sites in the city, development will require a contamination investigation and remediation and there is likely to be the need for a significant programme of archaeological investigation. Site preparation costs alone are predicted to be more than £16million. Relative to other parts of the city, development values are lower and commercial values continue to be affected by changing market conditions.

7. Norwich city council for a number of years has concluded that development of this complex brownfield site will rely on an element of public sector subsidy and has taken positive steps to support delivery.
8. In the knowledge of financial barriers to delivering development on this site, in September 2017 the city council submitted a bid to the Homes England Housing Infrastructure Fund (HIF) for marginal viability funding. Homes England in March 2019 notified the council of internal approval to proceed with a formal award of £15 million of grant in relation to the call-in scheme. Homes England remain strongly supportive of assisting the council in the delivery of the comprehensive redevelopment of Anglia Square and there is the prospect of repurposing of the award for a suitable scheme which can be delivered within a timetable that would see draw down of the funding by March 2024.
9. Norwich city council in June 2019 determined to make relief for exceptional circumstances available within its area, in accordance with Regulations 55 to 57 of the Community Infrastructure Levy Regulations 2010 (as amended). This allows Exceptional Circumstances Relief (ECR) to be considered where individual sites with specific and exceptional cost burdens would not be economically viable due to the payment of Community Infrastructure Levy (CIL). The Regulations state that relief from liability to pay CIL can be granted where the council consider there are exceptional circumstances and they consider it expedient to do so. As well as consideration of development viability, Norwich's policy requires the demonstration of wider community and regeneration benefit. An application for ECR can only be made following the grant of planning permission and it would be at this stage that the council would determine whether the need for relief has been proven and is justified. In relation to the call-in scheme the applicants confirmed their intention to seek ECR.
10. Development viability will be subject to detailed scrutiny at planning application stage.
11. The current pre-application scheme is for around 1060 dwellings and the developer maintains that this amount is necessary for the scheme as a whole to be deliverable. As a matter of principle, it would be the partnership's preference to remove the specific reference to 800 dwellings from the policy text. Instead to refer to a likely range of between 600-1,000 homes in the supporting text. For the purpose of establishing a figure to contribute to the 'total housing potential' of the strategy, and for interim monitoring, it is assumed that the site will be deliver 800 homes although it should be stressed that this is neither an assessment of capacity nor a minimum requirement. This is a subject for discussion at the hearing which has been raised with both the site promoter and Historic England.

### Question 3

Does the evidence support the expected delivery of the housing units 2026/27 – 2031/32? (Document 3.2C)?

### Response to question 3

12. There is current developer interest in the site. The developer has a detailed development programme which relies on the submission of a planning application by the end of March 2022 and that subject to planning approval, a start on site early in 2023. The developer has indicated that delivery will be reliant on HIF funding and the build programme is structured around the milestones that would need to be met for HIF funding to be drawn down in accordance with Homes England requirements for expenditure. The limited availability of public funding requires development to be delivered at pace. The programme sees the delivery of around 310 dwellings by the end of 2025 and the remainder by end of 2027.

### Question 4

Is this site subject to multiple leases / ownerships? To what extent could this affect its delivery?

### Response to question 4

13. With the exception of Surrey Chapel and 100 Magdalen Street the entire site is under one ownership. Anglia Square currently has multiple leases, the majority of which are on a short term basis and contracted outside the Landlord and Tenant Act 1954. This gives the owner/landlord the flexibility to serve notices to enable Vacant Possession to be achieved and therefore allow the land to be developed. Notice periods vary between 1-6 months. A small number of leases are more complex and dialogue with tenants is underway regarding existing leases and relocation options.
14. Ownership and leases are such that phased delivery of development would not be encumbered.

### Question 5

Has the effect of a scheme for 800 homes on the historic environment, and the implications for infrastructure, been properly assessed and can appropriate mitigation be achieved?

### Response to question 5

15. A considerable amount of evidence in relation to the historic environment was produced in association with the call-in scheme and the impact of development on that environment was a principal consideration of the 4-week inquiry. The inquiry process provided a thorough explanation of how heritage assets impacted by that scheme derived their significance from their intrinsic qualities and their settings, extending to the Anglia Square site. The SoS refusal was in part on heritage grounds and the decision letter set out in detail where he judged the development resulted in

less than substantial harm to a list of specified heritage assets. Less than substantial harm at the upper end of the spectrum was identified in relation to two heritage assets, the church of St Augustine and 2-12 Gildencroft.

16. The site allocation policy relates to a larger site and envisages a lower quantum of dwellings than that of the call-in scheme. The inspector who conducted the inquiry into the call-in scheme considered that the impact on heritage assets was acceptable and the Secretary of State agreed with his assessment in most respects. Norwich city council is therefore confident that a scheme that is considerably less tall and with reduced massing that flows from the site allocation policy is capable of complying with the site allocation policy at the same time as meeting the statutory tests and NPPF requirements in relation to impact on heritage assets, taking into account public benefits and scheme viability.
17. As referred to in paragraph 4 there is a current pre-application process for a mixed-use scheme. The emerging development approach has had regard to the weaknesses identified by the SoS. The current scheme comprises multiple blocks with height on the edges of the site ranging from 4 – 7 storeys. No building on the site exceeds 8 storeys. Compared to the call-in scheme the height and massing of development proposed within the Anglia Square character area of the city centre conservation area (CCCA) is substantially reduced and the development will be less visible in strategic long views and in medium range views across the CCCA. The planning application expected in March will be accompanied by a full Townscape and Heritage Impact Assessment.
18. No abnormal infrastructure requirements were identified in relation to the call-in scheme.

## Question 6

Are the detailed requirements set out in Policy GNLP0506 justified and effective? Are they supported by the evidence and deliverable?

## Response to question 6

19. The policy includes 14 site specific requirements (SSR).
20. SSR 1 – Anglia Square represents a significant part of the Anglia Square/Magdalen Street Large District Centre. A mixed-use regeneration scheme is necessary to ensure that the location continues to positively support the health and vitality of the wider Large District Centre and the role the square plays in supporting the needs of the local community. SSR 1 references a range of town centre uses capable of forming part of a balanced mix.
21. SSR 2 - The site includes an operational shopping centre and a public square. The site is large, substantial demolition is required and the construction period will extend over a number of years. Agreement of phasing is necessary to mitigate the impact of development on the centre, both tenants and shoppers and to ensure the



environmental impact of the construction phase on the local environment is satisfactorily managed.

22. SSR 3 – The existing shopping environment is degraded and the surface level car parking severs an effective connection to St Augustines Street. Historically a medium sized supermarket fronted onto the square, this was vacated some years ago. The redevelopment of the site and introduction of a substantial number of new homes on the site provides the opportunity to improve the shopping environment, repair severance and improve the qualitative offer.
23. SSR4 - Sovereign House has been vacant since the late 1990's and the multi-storey car park (MSCP) was condemned as structurally unsound some years ago. Sovereign House is now in a poor state of repair and includes large amounts of asbestos. The nature of the 1960's development is such that the larger buildings are structurally connected by the precinct structure. With the exception of Surrey chapel and adjacent buildings on Pitt Street, all other buildings on the site are identified as negative buildings in the Anglia Square conservation area appraisal. Comprehensive development of the site would be substantially constrained without demolition.
24. SSR5 - The current site provides surface level public car parking. Prior to the closure of the MSCP around 600 covered spaces were also available. In the event of a scheme seeking to re-provide public parking, high quality decked parking would be required (i.e, removal of surface level provision). The need for public parking will be assessed at planning application stage in the context of the mixed of uses proposed and a comprehensive travel plan which seeks to ensure that the needs of the development and the wider large district centre are met in a sustainable manner.
25. SSR6 – The requirement reinforces the need for development to meet the guiding principles of good design. There may be scope to provide a landmark building/s within the site to reinforce the sense of place and the role the development will play as a designation for the community.
26. SSR7 - The requirement reinforces the need for development to conserve and enhance the significant of heritage assets.
27. SSR8 - The requirement reinforces expectations for environmental enhancements
28. SSR9 - The location of the site at the northern fringe of the city centre affords a high degree of accessibility by all modes of travel, primarily by car, local bus routes, walking and cycling. The proximity of the site to; employment, shops, a wide range of facilities and services, as well as to transport hubs, creates the very best conditions for promoting sustainable travel behaviour by both future occupiers. Policy supports low-car or car-free housing in this location.
29. SSR10 - The requirement reinforces the need for environmental assessment of noise and air quality



30. SSR11 - There are currently no clear, coherent or pleasant routes through the site. The route between St George's Street and Edward Street is blocked by a surface car park and has no flanking active frontages. People who do walk this way pass an empty building with a blank concrete base to the east and an open car park to the west. There are currently two routes from Magdalen Street to St Augustine's Street. The main route along Sovereign Way is overshadowed by the underside of the cinema and the vehicle bridge above. The re-establishment of two primary historic routes passing through the site is justified as a requirement and will enhance pedestrian circulation and reconnect historic streets.
31. SSR12 – The requirement reinforces the need for high quality public realm. The site bounds land under the flyover. This land on Magdalen Street currently blights the street scene and discourages people from visiting Anglia Square and the northern part of Magdalen Street. Land under the flyover along with the Magdalen Street frontage will act as a primary gateway to the new development and enhancement will both benefit the development and the use of this space by the community.
32. SSR13 – Every bus between the north of the city and the city centre passes along Magdalen Street. The street is on 16 bus routes with buses stopping every 5 minutes. A bus stops at the north bound stop every 5 minutes. The scale of development proposed at Anglia Square will directly result in an increased demand for public transport services. A mobility hub featuring shared transport services (buses, car club and bike share) centred on Magdalen Street in the vicinity of the flyover that is easily accessible on foot and by bicycle to promote use of sustainable transport modes by residents, visitors and other users is justified.
33. SSR14 - Reinforces policy requirements of Policy 3 of the plan

### Question 7

How would the re-development of Anglia Square support and be the catalyst for change in the wider Northern City Centre strategic regeneration area?

### Response to question 7

34. Currently Anglia Square is significantly under-utilised and the shopping centre is tired and outdated. The degraded appearance of Sovereign House and the site in general is detrimental to the local historic townscape and a highly visible indicator of decades of dereliction and lack of historic developer interest in this part of the city. The site lies within the northern city centre where there are significant concentrations of deprivation. Development provides the opportunity to: deliver environmental enhancement through the remediation of derelict buildings; bring benefits to local people through the creation of new jobs, new housing and an improved and invigorated district centre.
35. Significant inward investment in this site would be a statement of confidence in the city of Norwich and boost the city's profile and attractiveness to other inward investment. Key sites including Duke's Wharf (GNLP0401), St Mary's Works

(GNLP3054), St George's Works (GNLP2114) and on Barrack Street (GNLP0409AR and GNLP0409BR) are all within approx. 500m of Anglia Square. The development has the ability to act as a catalyst for transformative change within the wider northern city centre area. The timely development of Anglia Square is considered of strategic importance and a factor in determining whether Norwich achieves its full economic potential.

## **Issue 2: Land between Fir Covert Road and Reepham Road, Taverham (Ref GNLP0337R) Is the proposed site allocation soundly based? In particular:**

### **Question 1**

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

### **Response to question 1**

36. The allocation of site GNLP0337R (see [A2](#), pages 242 - 244 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as a suitable and deliverable site in Taverham as part of the Norwich Urban Fringe element of the hierarchy, see the 'Taverham and Ringland' site assessment booklet [B1.11](#).

### **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**

37. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Taverham and Ringland site assessment booklet ([B1.11](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0337R the main constraints were identified as utilities capacity, townscapes, biodiversity and geodiversity, highways access, critical drainage catchment and downstream reports of flooding, which are proposed to be mitigated through requirements in the policy (see [A2](#), pages 242 - 244).
38. The site has been the subject of Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly pages F318 to 321 and G8).

39. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices 9c Reg 18C Urban Fringe ([A8.13](#)) and 11 Reg 19 Sites representation summaries and responses ([A8.20](#))). In the case of site GNLP0337R a minor modification to correct the site area is proposed so that the area within Marriot's Way which does not technically form part of the site is removed.

### Question 3

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

### Response to question 3

40. The availability of site GNLP0337R is confirmed through a Statement of Common Ground agreed with the promoter ([D2.74](#)).
41. The viability of site GNLP0337R has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
42. The deliverability of site GNLP0337R is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
  - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 30/31
  - Statement of Common Ground ([D2.74](#))
  - Site Delivery Table ([D1.5](#))
43. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#)). Page 2 of ([D3.2B](#)) provides an explanation of the updates, for site GNLP0337R it explains that the site is allocated for 1,400 homes, it was counted as 1,405 homes at Regulation 19 based upon information current at that time. Up to date information from pre-application discussions suggests 1,450 homes. The Statement of Common Ground includes aspirations for a higher number of dwellings and provides a timetable for delivery.

### Question 4

Does the evidence support the expected delivery of the housing units 2026/27 – 2036/37?  
(Document 3.2C)

### Response to question 4

44. As stated on page 30/31 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0337R has been promoted, is assessed as suitable and has been shown by appraisal to be

viable. Evidence from Lichfields publication '[Start to Finish](#)' indicates that such sites typically deliver their first homes 3 years from validation of a planning application.

45. The site promoter Scott Properties has provided an SoCG ([D2.74](#)) indicating their intention to bring forward the development through a planning application in late 2021. At the time of writing this response, the application is yet to be submitted, however it is understood that considerable work to progress towards submission has been undertaken. Scott Properties SoCG timetables for construction to begin in 2023, with the delivery of the first 30 dwellings in 2024 and completion of the scheme by 2035. GNLPO337R is consequently considered a 'deliverable' site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with a slightly more cautious forecast delivery of 50 homes in 2024/25 and completion of the site in 2036/37.

### Question 5

Are the detailed requirements set out in Policy GNLPO337R justified and effective??

### Response to question 5

46. The policy requirements for site GNLPO337R are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. Consultation comments have been taken in to account in developing the site allocation policies. no changes were considered appropriate following comments received to the Regulation 18C consultation, however a correction to the stated site area is proposed following comments received to Regulation 19 consultation.

### Issue 3: Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston (Ref GNLPO132) Is the proposed site allocation soundly based? In particular:

#### Question 1

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

#### Response to question 1

47. The allocation of site GNLPO132 (see [A2](#), pages 235 - 238 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as a suitable and deliverable site in Sprowston as part of the Norwich Urban Fringe element of the hierarchy, see the 'Sprowston' site assessment booklet ([B1.10](#)).

## Question 2

Is the proposed capacity of 1,200 dwellings justified?

### Response to question 2

48. The proposed capacity of 1,200 dwellings is justified. Site GNLP0132 was promoted for 1,226 dwellings, see the ‘Sprowston’ site assessment booklet ([B1.10](#)). The site allocation policy states: “*The site is expected to accommodate approximately 1,200 homes*”. This provides a degree of flexibility. The density is in line with the indicative requirements set out in Strategic Policy 2.
49. The site is expected to accommodate open space formal recreation in the form of sports pitches and children’s’ play space in accordance with the adopted policies; an allowance of 12ha to be reserved for a new high school is required on this site. If the high school is required sports pitches may be a shared facility with the school. The consortium of developers (Hopkins Homes, Persimmon Homes and Taylor Wimpey) have indicated that provision of the school may require a reduction of around 200 homes on the site (page 67 [D3.2](#)). This forms ongoing discussion as part of the Statement of Common Ground for this site and will be subject to more detailed master planning.

## Question 3

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 3

50. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Sprowston site assessment booklet ([B1.10](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0132 the main constraints were identified as Significant Landscapes, Open Space and GI, (it is next to Historic Parkland and part of the site is within Ancient Woodland (Bulmer Coppice) an important green infrastructure feature that should be protected), Biodiversity and Geodiversity (Great Crested Newts have been found in the vicinity), Transport and Roads, which are all proposed to be mitigated through requirements in the policy (see [A2](#), pages 236 and 237).
51. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F307 to 312 and G8) appraises the constraints and mitigation impacts of the proposed policy.

52. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0132 no major constraints are recognised to make the site unsuitable for development.

#### Question 4

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

#### Response to question 4

53. The availability of site GNLP0132 is confirmed through detailed ongoing discussions with the site promoters and developers towards agreeing a Statement of Common Ground for the site.
54. The viability of site GNLP01325 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)) additional detailed site specific work has been ongoing with the Development Partnerships appointed consultant and the site promoters as part of the Statement of Common Ground discussions.
55. The deliverability of site GNLP0132 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
  - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 29/30
  - Site Delivery Table ([D1.5](#))
  - The GNLP Team and the site promoters are committed to working towards completion of a statement of common ground in advance of the examination in public for the site.
56. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#)). Although a Statement of Common Ground is yet to be formally agreed, it is understood that the consortium of developers behind the proposals for this site are in the process of successfully delivering the adjacent sites in Sprowston; it is the intention for this site to be brought forward as a subsequent phase of these operations. Other objective evidence used for forecasting includes the Lichfields publication '[Start to Finish](#)'.

#### Question 5

Does the evidence support the expected delivery of the housing units 2026/27 – 2033/34? (Document 3.2C)?

#### Response to question 5

57. As stated on page 29/30 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0132 has been promoted, is assessed as suitable and has been shown by appraisal to be viable, additional bespoke work for this site has been carried out by the partnership's



appointed consultant in discussion with the site promoter. Evidence from Lichfield's [Start to Finish](#) indicates that such sites typically deliver their first homes 3 years from validation of a planning application.

58. The developers (Hopkins Homes, Persimmon Homes and Taylor Wimpey) have indicated through discussions with the GNLP regarding progressing towards a SoCG that current delivery of the adjacent White House Farm Phase 2 scheme by the consortium, demonstrates GNLP0132 to be a 'developable' site under the NPPF definition. Furthermore, the consortium intends to use its existing onsite construction teams on GNLP0132. Given the good progress on White House Farm Phase 2, and the consortium's intention to use its existing onsite construction teams, the housing trajectory assumes development of site GNLP0132 will commence in 2026/27. Taking a cautious approach, a rate of up to 190 homes per annum is assumed. This rate is below that previously experienced on the current site being delivered by this consortium of 45 in 2015/16, 195 in 2016/17, 195 in 2017/18, 238 in 2018/19, and 213 in 2019/20 (see also appendix 5 as this is a strategic site).

### Question 6

Are the detailed requirements set out in Policy GNLP0132 justified and effective?

### Response to question 6

59. The policy requirements for site GNLP0132 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. 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 GNLP0132 this included amendments relating to High School provision, open space formal recreation in the form of sports pitches and children's' play space. The partnership is in ongoing discussions relating to the policy wording concerning high school provision and sports pitches and children's' play space which shall be detailed in a Statement of Common Ground which is in the final stages of agreement.

## Issue 4: Costessey Contingency Site (Ref GNLP0581/2043) Is the proposed site allocation soundly based? In particular:

### Question 1

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



## Response to question 1

60. The proposed allocation of site GNLP0581/2043 as a contingency site (see [A2](#), pages 474 to 476 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as a contingency allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site to be brought forward as a contingency allocation should a shortfall in housing delivery require it.

## 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

61. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Costessey site assessment booklet ([B1.4](#)). 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, Children's Services, Minerals and Waste and the Lead Local Flood Authority. Site GNLP0581/2043 was initially promoted/assessed as two separate sites which involved highways access issues, by combining the sites to a single proposed allocation, this went some way to overcoming access issues to enable a larger deliverable site. The main constraints were identified as Utilities Capacity, Utilities Infrastructure (overhead cables across site), surface water flood risk, significant landscapes (the site is in the designated river valley and Norwich Southern Bypass Landscape Protection Zone), heritage impact and the need for potential highway improvements. These constraints are proposed to be mitigated through requirements in the policy (see [A2](#), pages 474 and 476).
62. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F257 to 261 and G7) appraises the constraints and mitigation impacts of the proposed policy.
63. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0581/2043 a Heritage Statement ([B10.10](#)) has been produced in response to concerns raised by Historic England.

### Question 3

Is the land required in order to deliver a safe and suitable access into the site available?

#### Response to question 3

64. The land required in order to deliver a safe and suitable access into the site is currently under review by Norfolk County Council highways. Land required to deliver safe and suitable access into the site is understood to be in the ownership of Norwich City Council, this includes:
- land on the north and south sides of New Road between Chapel Break Road and the proposed southern access to site GNLP0581/2043,
  - land linking Barnard road to Contingency Site GNLP0581/2043.
65. Norfolk County Council Highways continues to raise concerns regarding the achievable carriageway width at New Road and the potential requirement of third party landowner agreement. Norwich City Council as landowner are investigating the impact and opportunities
66. Norwich City Council as landowner is working co-operatively with Terra Strategic to support the allocation of this site including the availability of this land subject to commercial agreements between landowners. Barton Wilmore on behalf of the landowners are producing a technical note for review by Norfolk County Council Highways Authority to demonstrate deliverability of a safe and suitable access. This issue continues to be under discussion will be addressed in a Statement of Common Ground ahead of the hearings.

### Question 4

Has the availability, viability and deliverability of the site been robustly assessed? Would the requirement to provide new educational facilities within the site affect its ability to meet other policy requires, e.g., for affordable housing?

#### Response to question 4

67. The availability of site GNLP0581/2043 is confirmed through a Statement of Common Ground which is being prepared and agreed with the promoters of the site (both Terra Strategic and Norwich City Council as landowner) this statement is in the final stages of preparation and shall be made available in advance of the examination in public for the sites.
68. The viability of site GNLP0581/2043 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)). The policy requirement is for the landowner to make land available to the education authority for the provision of educational facilities. The development of the educational facilities will not be the responsibility of the landowners.

69. Due to the nature of the site being a contingency allocation, the deliverability of site GNLP0581/2043 has not been demonstrated in the same way as the proposed full allocations in the plan. However, the statement of common ground in production with the site promoters provide assurance that they are committed to timely delivery of the site, with further assurance that the site could deliver dwellings within the first five years following adoption of the plan.

### Question 5

Is the proposed trigger mechanism for the release of this site justified and effective?

### Response to question 5

70. The proposed trigger mechanism for the release of this site is justified and effective. As per the partnership's response to Question 19 of the Inspectors Initial Questions ([D1.3](#) page 18), the trigger mechanism set out in policy GNLP0581/2043 would allow the site to come forward if overall delivery, as evidenced through the AMR:
- Is 15% or more below plan targets for three consecutive years;
  - And where under-delivery is the result of site-specific constraints preventing the delivery of committed and allocated housing sites.
71. The element of the policy requirement in the first bullet point above is designed to have a level of consistency with the Housing Delivery Test (HDT) in terms of using percentages of under delivery over three years. It was also chosen as it is readily measurable and the use of three consecutive years provides the certainty that there is a clear area wide under delivery problem which requires a solution rather than an exceptional year or two of under delivery.
72. The element of the policy requirement in the second bullet point above ensures that under delivery is due to site specific problems elsewhere rather than systemic housing market problems that the inclusion of the Costessey site, or indeed planning as a whole, would not be able to solve.

### Question 6

Are the other detailed requirements set out in Policy GNLP0581/2043 justified and effective?

### Response to question 6

73. The policy requirements for site GNLP0581/2043 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. 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 GNLP0581/2043 this included combining two previously separately promoted sites into a single proposal and producing a Heritage Statement ([B10.10](#)) in response to concerns from Historic England.

74. Policy criterion 10 does however require amendment as follows:

- Include pedestrian and cycle access across the site and to neighbouring residential and retail areas and other services and facilities in Bowthorpe and Costessey (Longwater) and to the open countryside to promote active travel. ~~This should include safeguarding of land for a pedestrian footbridge over the A47;~~

75. The reason for this amendment is that the proposed pedestrian bridge falls outside the land within the boundary of site GNLP2043/0581.