

**GREATER NORWICH  
LOCAL PLAN  
EXAMINATION (PART 2)  
HEARING STATEMENT**

---

# Quality Assurance

<b>Site name:</b>	Greater Norwich Local Plan Examination (Part 2)
<b>Client name:</b>	Persimmon Homes Ltd, Hopkins Homes Ltd, Taylor Wimpey UK Ltd
<b>Type of report:</b>	Hearing Statement
<b>Prepared by:</b>	Sarah Hornbrook MA (Cantab) MSc MRTPI
<b>Signed</b>	
<b>Date</b>	11 <sup>th</sup> February 2022
<b>Reviewed by:</b>	James Alflatt BA (Hons) Dip TP MSc MRTPI PIEMA
<b>Signed</b>	
<b>Date</b>	11 <sup>th</sup> February 2022



# 1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Bidwells LLP on behalf of Persimmon Homes Ltd, Hopkins Homes Ltd and Taylor Wimpey UK Ltd (hereafter 'the Consortium') in support of representations made to the Greater Norwich Local Plan. By way of background, the Consortium are promoting land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston – site GNLP0132 – for residential-led development of approximately 1,000-1,200 dwellings. Site GNLP0132 forms a third phase of development of the White House Farm landholding, and the Consortium have been responsible for bringing forward the first two phases. Phase 1, to the east of Atlantic Avenue, is under construction, and Phase 2 (Site GT20), to the immediate west of site GNLP0132 has committee resolution to approve and is due to be granted outline planning permission for residential development imminently.
  
- 1.2 This Statement provides the Consortium's response to Matter 9, Issue 3 of the Inspectors' Matters Issues and Questions (Part 2), which relates to Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston (Ref GNLP0132), and asks whether the proposed site allocation is soundly based. Seven specific questions are raised, which are addressed in turn in the following sections of this Statement.
  
- 1.3 It should be noted that a Statement of Common Ground has not yet been signed for this site; all parties have been working hard to try and achieve this, but to date, it has not been possible. Extensive discussions have taken place with the Partnership on a number of key matters, and these are reflected in this Statement.

## 2.0 **Q1. Is the allocation justified and is it supported by the evidence?**

- 2.1 The allocation of site GNLP0132 is considered to be fully justified and supported by evidence.
- 2.2 As demonstrated in the Sprowston Site Assessment Booklet (B1.10), the site has been selected as a suitable site following a rigorous and robust assessment. Two additional sites were put forward for residential development, but neither were considered to be reasonable alternatives.
- 2.3 As detailed in the representations submitted to the Regulation 19 Publication on behalf of the Consortium (ID:24394), the site is located in a highly sustainable location within Norwich's Urban Fringe, and immediately adjacent to land already allocated for residential development in the Growth Triangle Area Action Plan (Site GT20 is immediately to the west, and Site GT7 to the south).
- 2.4 Significant evidence of the site's suitability has been presented at earlier stages in the plan's preparation, as specified in the Sprowston Site Assessment Booklet and, subject to resolution of outstanding issues in relation to the viability assessment, the site is available and deliverable within the Local Plan period.
- 2.5 There are no physical constraints that would affect the suitability of the site for residential development and the allocation is appropriate and supported by evidence.

## 3.0 Q2. Is the proposed capacity of 1,200 dwellings justified?

- 3.1 The proposed capacity of 1,200 dwellings is not considered to be fully justified.
- 3.2 It is considered, based on assumptions that reflect the Consortium's experience on site GT20, to the west, that this capacity could be achieved, but only if land for a secondary school land is not required. Should that land be required, then the capacity of the site is likely to be lower, around 1,000 dwellings. This figure assumes that, should the secondary school land be required, land for a primary school (2ha) will not be required, and that the school sports pitches will be made available for community use, so that the residential development will not be required to provide additional sports pitches (which would equate to approximately 4ha). These assumptions are based on principles agreed with relevant Officers at the Councils during ongoing discussions. Should these mitigations not be agreed, then the capacity of the site is likely to be significantly lower.

### Suggested Revisions/Modification

- 3.3 As set out in the Consortium's Regulation 19 Representation (ID:24394) it is considered that changes to the Policy wording are required to reflect the potential range in the site's capacity. The suggested use of 'At least 1000 homes' in place of 'Approximately 1200 homes', together with inclusion of clarification text relating to shared use of sports pitches and omission of primary school land, should land for a secondary school be provided, is considered to be more appropriate.
- 3.4 The full text of the suggested revisions to the wording of Policy GNLP0132 is set out in Section 8.

## 4.0 **Q3. Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?**

- 4.1 The Sprowston Site Assessment Booklet (B1.10), which includes a summary of the HELAA, details how a range of potential environmental and other constraints, including flood risk, heritage and landscape and highways, were initially considered in order to identify 'reasonable alternative' sites.
- 4.2 The Sustainability Appraisal referenced within the Site Assessment Booklet adopted a scoring system and assessment narrative to assess the performance of each of the reasonable alternative sites and, where appropriate, identify appropriate mitigation. As part of this process, discussions have been held with key consultees, notably the highway authority, children's services, the LLFA and the Council's Development Management Team. As a result of this considered assessment process, Preferred Sites have been identified and sites allocated.
- 4.3 In addition, the Representations submitted by the Consortium during earlier stages of the preparation of the Plan are informed by a substantial amount of technical evidence demonstrating the suitability of the site, having regard to both potential constraints and the ability to implement appropriate and proportionate mitigation.
- 4.4 The site is subject to a range of constraints, which include the need to provide green infrastructure/bat corridors in accordance with the Growth Triangle Area Action Plan, the need to provide vehicular access to the site from Salhouse Road in a location that avoids conflict with the planned access into other development land to the south of Salhouse Road, the need to retain and protect the Ancient Woodland in the south-eastern corner of the site, the proximity to a County Wildlife site to the west of the site, and the presence of buried utilities in the south-western part of the site.
- 4.5 These constraints were known and understood and informed the initial Capacity Study and Masterplanning Exercise that took place when the site was originally put forward for allocation. As further information has become available, such as the views of the Woodland Trust and Norfolk Wildlife Trust (see document B20.11) in relation to the potential need to create a green buffer around the Ancient Woodland, the Masterplan Strategy has been refined to ensure that appropriate mitigation can be achieved. This is reflected in the Consortium's Regulation 19 Representation (ID:24394) which suggested reduced dwelling numbers.
- 4.6 On this specific matter (the impact of the ancient woodland) the further comments made by Norfolk Wildlife Trust at Regulation 19 stage (ID:23888) are acknowledged, and it is considered that the wording of bullet point 6 of Policy GNLP0132 is sufficient to ensure that suitable mitigation is secured at planning application stage. However, there is no requirement to specify that formal recreation in the form of sports pitches and children's play space should be located adjacent to the ancient woodland, as currently suggested at bullet point 8 of Policy GNLP0132 as this might not be the best or most appropriate mitigation strategy. The condition and value of the ancient woodland needs to be fully understood before specific mitigation is agreed, and this work can be undertaken at planning application stage.

4.7 On this basis, it is evident the potential constraints to development on the site have been fully considered and that mitigation required by Policy GNLP0132 can be achieved.

#### Suggested Revisions/Modification

4.8 The full text of the suggested revisions to the wording of Policy GNLP0132 is set out in Section 8.

## 5.0 **Q4. Has the availability, viability and deliverability of the site been robustly assessed?**

- 5.1 The availability, viability and deliverability of the site has not been robustly assessed. The availability of the site, and therefore its deliverability, is wholly dependent on the viability, and in particular the impact of accommodating the secondary school on the land value.
- 5.2 As set out in the Regulation 19 Representations prepared by Intali on behalf of the Consortium (ID: 23833, 23835 and 23836), it is considered that there are a number of fundamental flaws in the Viability Appraisal prepared by NPS Group in December 2020 (document B26.3). These concerns are set out in detail in the above referenced Regulation 19 Representations and are not repeated here, but in summary, the key issues relate to Benchmark Land Value, Revenue Assumptions, and the net-to-gross site area ratio and approach to open space provision adopted for typology 11.
- 5.3 The Viability Appraisal states at paragraphs 56 and 57 that the strategic sites are to be subject to individual appraisal, recognising that the strategic sites will be impacted by strategic infrastructure costs over and above the usual development costs of an average development site. However, this assessment has not taken place, a shortcoming which is particularly significant for site GNLP0132 as it is the only site allocated to accommodate in excess of 1,000 dwellings where there is the potential for significant strategic infrastructure to be required.
- 5.4 Whilst the Partnership have indicated in recent verbal discussions that they would be willing to accept application-stage viability assessment for site GNLP0132, it is considered that an initial site-specific viability assessment should be undertaken at plan-making stage in order to accord with the NPPF and the Planning Practice Guide, and to ensure that other policy requirements are set at a level that allows for the planned development to be deliverable.
- 5.5 Greater clarity is also required, at this stage, in relation to the specific costs and land requirements of the proposed secondary school, as well as the mechanism and timeframe for either securing or releasing the safeguarded land (see response to Q5 in relation to the latter). Officer level discussions have indicated that there may be scope for shared use of sports pitches, and the potential to forego the provision of a primary school, but this is not reflected in the wording of Policy GNLP0132. It is important that agreement is reached on these matters, as they have significant implications for the extent of the reduction in land available for residential development, should the secondary school land be required.
- 5.6 For example, a development of 1,000 homes is likely to generate a requirement for approximately 4 hectares(ha) of sports pitches, based on Broadland District Council's Adopted Supplementary Planning Document. If this requirement can be accommodated within the 12ha of land required for the secondary school, then the impact of providing the secondary school land on both the number of dwellings yielded by the site, and consequently the values achieved, will be much reduced.
- 5.7 In addition, clarity is required at this stage about the extent of land that will be purchased by the Local Education Authority (LEA), and at what value, as this will also significantly affect the viability of the 'with secondary school' scheme. Officer level discussions have previously alluded to the LEA purchasing a proportion of the school site at a value no lower than Benchmark Land Value. This would be calculated on a pro-rata basis as the proportion of the residual land requirement,



after deduction of the sports pitches and primary school land, the need for which is not generated by the development.

- 5.8 The landowners' position is that the site is only available if the land value achieved for the whole site is not impacted by the inclusion of the secondary school land, or other strategic infrastructure. They, and the Consortium, accept that there is a requirement to contribute towards the provision of educational facilities, but this should only relate to the demand created by the development itself. This position is fully supported by the Planning Practice Guide (paragraph 10-029-20190509) where, under the heading, 'How should viability for education provision be assessed?' it states that, "It is important that costs and land requirements for education provision are known to inform site typologies and site-specific viability assessments, with an initial assumption that development will provide both funding for construction and land for new schools required onsite, commensurate with the level of education need generated by the development." (Our emphasis added).
- 5.9 In this instance, based on figures provided by the County Council, a 1,000-unit scheme is likely to generate in the region of 150 secondary age pupils. This equates to less than 10% of the planned capacity of the secondary school (1700 pupils). Therefore, in order to compensate for the provision of strategic infrastructure, adjustments to other policy requirements, such as affordable housing, may need to be made to ensure that the land value is not adversely impacted.
- 5.10 This approach is in line with the recommended approach set out in national planning guidance, which recognises that there is a need to ensure that the land value provides a reasonable incentive, in comparison with other options available, for the landowner to sell land for development. At present, given the various uncertainties set out above, the landowner is not convinced that there will be sufficient incentive to sell the land for development, and its availability is not, therefore, guaranteed.

#### Suggested Modifications/Revisions

- 5.11 A site-specific viability assessment of the site should be undertaken, and to inform this, the key principles relating to matters such as shared use of sports pitches and provision of land for a primary school should be agreed and reflected in the Policy wording.
- 5.12 The viability assessment should be undertaken on the basis that the same land value should be achieved whether the secondary school land is provided or not.
- 5.13 Depending on the outcome of this exercise, the policy requirements for affordable housing for this site may need to be adjusted.
- 5.14 The full text of the suggested revisions to the wording of Policy GNLP0132 is set out in Section 8.

## 6.0 Q5. Does the evidence support the delivery of the housing units 2026/27 – 2033/34? (Document 3.2C)

6.1 Whether or not the Housing Trajectory set out in document 3.2C is achievable will be dependent on the timeframe and mechanisms for safeguarding of the secondary school land, which are not currently specified within Policy GNLP0132.

6.2 As previously described, the site is subject to a number of constraints, and those, combined with the Consortium's requirement to provide an equal land split between the three developers, mean that it will not be possible to begin Masterplanning the site until a decision has been made on whether or not the secondary school land is required.

6.3 It is likely that the distribution of land uses across the site would be quite different should the secondary school land not be required, compared to if it is. The 12ha of land which have been identified by the County Council as the most appropriate location for the school, are positioned in the north-east corner of the site. Should this land not be required for the secondary school, this location may not be the most appropriate for the provision of the sports pitches and primary school land that would then be required, in addition to further residential development.

6.4 Recent discussions with the Partnership have indicated that they consider that the secondary school land should be safeguarded for a period of three years i.e until April 2025, unless the Local Education Authority provide notification that it is not required in advance of this. The Consortium consider that this period of time is excessive, and will inevitably delay delivery of the housing on this site. They also consider that the timeframe for safeguarding the school should be linked to the delivery of the secondary school on the preferred site at North Rackheath (GT16 in the Growth Triangle Area Action Plan), such that should planning permission for the school be granted on site GT16, the requirement to safeguard the school land would fall away.

6.5 If the Partnership's preferred date of April 2025 is adopted, the implications are likely to be that a start on site is delayed until at least 2028/29, as set out in the table below:

	2025/26	2026/27	2027/28	2028/29
<b>Preparation and submission of Outline</b>				
<b>Approval of Outline</b>				
<b>Approval of first RM</b>				
<b>Start on Site</b>				

6.6 This represents a two-year delay to the trajectory set out in D3.2C, which would mean that the dwellings would be delivered between 2028/29 and 2035/36, still within the Local Plan period.

## 7.0 **Q6. Are the detailed requirements set out in Policy GNLP0132 justified and effective?**

- 7.1 Whilst the detailed requirements set out in Policy GNLP0132 are considered to be mostly justified and effective, minor alterations are required to ensure that they are fully justified and effective. All of the suggested revisions have already been addressed in the preceding sections of this Statement, and full text of the proposed revisions is set out in Section 8 of this Statement.

## 8.0 Proposed Modifications to wording of GNLP0132

- 8.1 The following modifications to the policy are proposed, for the reasons set out in the preceding sections of this Statement. New wording is shown in red text and that to be omitted is shown ~~struck through~~.

### Policy GNLP0132

#### Strategic Allocation

Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston. An area of approximately 66.78 ha is allocated for residential development. The site is expected to accommodate ~~approximately 1,200 homes~~ at least 1,000 – 1,200 homes, open space and land for a new high school, ~~should this be required~~.

The arrangement and interrelationship of different land uses resulting from the development of the site will be established through a participative masterplanning process, ~~and will vary depending on whether or not land for a secondary school is required~~. The development of the site will be in accordance with the resulting masterplan, which shall be submitted as part of the planning application for the site.

~~Should land for a secondary school be required, the land uses shall comprise:~~

- ~~• At least 1,000 dwellings, with TBC\*% Affordable Housing~~
- ~~• 12ha of land for a secondary school, with the sports pitches to be made available for community use in lieu of additional provision to serve the residential development.~~
- ~~• Informal open space, children's play space and allotments in accordance with the policies of the Adopted Development Plan.~~

~~Should land for a secondary school not be required, the land uses shall comprise:~~

- ~~• At least 1,200 dwellings, with affordable housing provision in accordance with the policies of the Adopted Development Plan.~~
- ~~• 2ha of land for a primary school.~~
- ~~• Formal and informal open space, including sports pitches, in accordance with the policies of the Adopted Development Plan.~~

The masterplan should clearly demonstrate how the development has been designed to respond to the particular characteristics of the site and to interact and function appropriately with adjacent development sites. The masterplan should demonstrate how homes, jobs, services and facilities have been integrated with walking and cycling, public transport facilities/services, provision for private vehicles and green infrastructure.

Development will not be commenced until a phasing plan indicating the orderly sequence of development has been approved. The phasing plan will need to show how infrastructure (including green infrastructure) and services are to be co-ordinated with the development of the site.

The masterplan should include:

1. Vehicular, pedestrian and cycle access to the site via Salhouse Road and Atlantic Avenue.

2. A new link road from Salhouse Road to Atlantic Avenue which includes footway and cycleway provision.
3. The provision of a footway and cycleway along the southern boundary of the site adjacent to Salhouse Road, continuing provision delivered through the development of adjacent land.
4. Off-site improvements to the highway network as necessary to address the impact of development.
5. Up to 12 ha of the site should be safeguarded to incorporate a well-located High School. An off-site drop-off area for buses and coaches to serve the school should be incorporated as part of the highway infrastructure for the development. Community use of open space associated with the school should be facilitated
6. Appropriate protection of, and mitigation for, impact on trees and woodland (established through an Arboricultural Impact Assessment). This should include safeguarding the ancient woodland of Bulmer Coppice and historic Rackheath parkland to the east of the site.
7. The delivery of Green Infrastructure to ensure connections between Harrisons Woodland Park and Bulmer Coppice/Rackheath Park
- ~~8. Provision of formal recreation in the form of sports pitches and children's' play space in accordance with the adopted policies of the development plan to be located adjacent to ancient woodland~~
8. An ecological assessment will be required to show how impacts on ecology, including Great Crested Newts, have been minimised and mitigated as part of the development of the site.
9. Appropriate remediation of any land contamination and/or localised made ground deposits, including those related to an historic gravel pit and landfill to the east of the site.
10. This site intersects watercourses so a WFD compliance assessment will be required for the watercourse receiving the runoff. A buffer of 20m will need to be maintained between the watercourse and gardens and opportunities for riparian habitat restoration should be secured.
11. Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is partly underlain by safeguarded minerals resources. The benefits of extracting the minerals, if feasible, will be taken into consideration.

The secondary school site will be safeguarded from development until 1 April 2025 or such time as a planning application including land for the secondary school at North Rackheath (GT16) is approved, or such time as formal notification is received from the Local Education Authority that the secondary school is not required, whichever is the sooner.

If notification is received from the Local Education Authority prior to 1 April 2025 that the secondary school is required, then the site will be transferred to the Local Education Authority in accordance with an infrastructure phasing plan to be agreed with the Local Planning Authority prior to the grant of planning permission. The notification from the Local Education Authority will include a commitment and timescale for the purchase of the secondary school land.

If not needed for the purpose of a secondary school, the safeguarded land shall be treated as any other part of the scheme.

\* Affordable Housing percentage to be determined by Viability Assessment, undertaken on the basis that the land value achieved is no less than that achieved under the 'no secondary school' scenario.



BIDWELLS