

**Greater Norwich Local Plan (GNLP) Statement of Common Ground
(SoCG)**

Between

**Broadland District Council, South Norfolk Council,
Norwich City Council, Norfolk County Council**

And

Persimmon Homes Ltd, Hopkins Homes Ltd, Taylor Wimpey UK Ltd

And

**Richard Eustace Thomas Gurney, Oliver Samuel Gurney and Henry
Robert Timothy Gurney, William Robert Bartle Edward, Grant Stanley
Pilcher as trustees of The Richard Gurney Children's Settlement**

Introduction

The Greater Norwich Local Plan (GNLP) proposes to allocate approximately 67 hectares (ha) of land off Salhouse Road, Sprowston for development. This site is referred to in the local plan as site [GNLP0132: Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston](#), whereas its promoters refer to the site as White House Farm Phase 3, recognising that GNLP0132 forms a third phase of development of the White House Farm landholding. Phase 1, to the west of Atlantic Avenue, is under construction, and Phase 2, 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.

The site GNLP0132 has been promoted by the Consortium of developers responsible for bringing forward Phases 1 and 2, comprising Persimmon Homes Ltd, Hopkins Homes Ltd, and Taylor Wimpey UK Ltd (hereafter the 'Consortium'), who have an Option Agreement on the site. During preparations of the local plan, there has been extensive discussion between the Consortium and officers of the Greater Norwich Development Partnership (GNDP) (hereafter referred to as the 'Partnership').

The Partnership and Consortium agree on the suitability of GNLP0132 for development and that it should be included in the local plan, and so discussions have focused on specific issues. This principally has been to do with the obligation or not to provide a 12 ha secondary school site; how this obligation should be triggered; and, what implications this has for the scheme's viability. Plus, more recently, whether other strategic infrastructure to serve the North East Norwich area would be required on GNLP0132, such as a terminal pumping station for Anglian Water.

As there is much that the Partnership and Consortium agrees upon, the purpose of this Statement of Common Ground (SoCG) is to set out matters where agreement is still to be reached. These key points are:

1. The Implications of Providing Land for a Secondary School on GNLP0132
2. Amended Policy Wording:
 - a. Policy Wording for Safeguarding the 12 ha Secondary School Site
 - b. Policy Wording for Affordable Housing provision
3. Calculating the Purchase Price of the 12 ha Secondary School Site for the Local Education Authority
4. Viability Implications for Providing the 12 ha Secondary School Site
5. The Implications of Accommodating other Strategic Infrastructure – such as a Terminal Pumping Station for Anglian Water

1. The Implications of Providing Land for a Secondary School on GNL0132

The Consortium and the Greater Norwich Authorities agree that the strategic infrastructure required on GNL0132 could include 12 ha for a secondary school. The Consortium and the Partnership disagree on how to resolve this question, and the timeframe in which a decision should be made on whether the secondary school site is required on this site or not.

The Consortium believes that a decision should be made within one year of adopting the GNL0132. Whereas the Partnership believes a longer-term period is needed to safeguard the option of a secondary school for the North East Growth Triangle (NEGT) on GNL0132, in order to give sufficient confidence that critical infrastructure will be able to be delivered. The Consortium considers that the master-planning of GNL0132 and its detailed viability would be impinged upon if a decision about the secondary school is not made more speedily. Given the many other site constraints, the Consortium's requirements for land equalisation, and the potential for delivery of the school site to alter the other development requirements (e.g. sports pitches and primary school provision – see section 4 for further detail) the Consortium consider it impossible to commence masterplanning the site until a decision on the secondary school has been made. This may mean it will not be possible to meet the current delivery projections included in the GNL0132 housing trajectory and this is likely to delay delivery by 2-3 years.

The Partnership argues that safeguarding a secondary school site at GNL0132 is integral to the overall master-planning of the area, at least until a new secondary school site is secured by legal agreement at the preferred location of North Rackheath (site reference GT16). And that to relinquish a secondary school site at GNL0132 too soon would carry an unacceptable risk of there being no new site, which in turn would be catastrophic for the place-making strategy as set out in the [North East Growth Triangle Area Action Plan adopted in 2016](#), and in respect of the need to ensure that there is sufficient school places available to meet the needs of existing and new communities as clearly expected by paragraph 95 of the NPPF.

2. Amended Policy Wording

The Partnership and the Consortium agree that it is necessary to amend the current policy wording through a Main Modification. A revised policy to this effect is set out below. This revised policy is substantively agreed with the exception of two specific elements: The policy wording for safeguarding the 12 ha secondary school site and the policy wording for the requirement for affordable housing. The relevant sections that are not agreed are shown in bold and underlined text in the policy.

a. Policy Wording for Safeguarding the 12 ha Secondary School Site

The Partnership and the Consortium agree that the policy should clearly set out the time period in which the land for a secondary school should be safeguarded and the circumstances in which the land may be released at an earlier date.

The Consortium are prepared to safeguard the secondary school site for one year after the adoption of the GNLP. The Partnership does not consider this a sufficient length of time and are of the view that a minimum of three years is necessary.

The reasons for the different positions are set out above in section 1 of this Statement of Common Ground.

b. Policy Wording on Affordable Housing

The Consortium considers that the policy should specify the affordable housing percentage that will be delivered on GNLP0132 in both allocation scenarios. This affordable housing percentage should be determined by a viability assessment undertaken at the plan making stage and on the basis that the land value achieved is no less than could be achieved under the “no secondary school” scenario.

The Partnership does not believe it is necessary to include reference to a specific affordable housing level. The Partnership accepts that this is a site where a site specific viability assessment at the point of application would be justified. Specifying an affordable housing percentage pre-empts the level of affordable housing that would be justified by the development of the site tested at the application stage once all abnormal costs, including those associated with the unresolved future requirement for a terminal pumping station, are known. Any viability assessment should be carried out in accordance with the prevailing guidance at that time, this will ensure the landowner receives a reasonable return to incentivise the development.

In the scenario of the scheme not providing a secondary school site, the Partnership believes that GNLP0132 is viable and developable. This work has been done, and the viability typology evidence prepared on the Partnership's behalf demonstrates what an acceptable benchmark land value is and there is a realistic prospect that GNLP0132 is viable. The viability implications for providing the 12 ha secondary school and other strategic infrastructure are addressed in sections 4 and 5 of this statement.

The Consortium considers that the typology evidence is fundamentally flawed, and therefore the viability of GNLP0132 has not been properly tested in either scenario.

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 at least 1,000 –1,200 homes, open space and if required land for a new secondary school

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 upon whether 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**
- 12 ha of land for a secondary school with sports pitches to be made available for community use
- Informal open space, children's play space, 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 in line with Policy 5**
- 2 ha 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. If required, up to 12 ha of the site should be safeguarded to incorporate a well-located secondary 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. 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 20 m 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 Requirement for a Secondary School

The secondary school site will be safeguarded from development until **1 April 2026** or such time as a planning application including land for the secondary school at Rackheath on GT16 is approved and land for the secondary school secured through a planning obligation, 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 on or prior to **1 April 2026** 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 land.

***affordable housing percentage to be determined by a viability assessment, undertaken on the basis for the land value achieved is no less than that achieved under the “no secondary school” scenario.**

3. Calculating the Purchase Price of the 12 ha Secondary School Site for the Local Education Authority

The Consortium has undertaken discussions at an officer-level with the Local Education Authority about at what cost the 12 ha could be secured for a secondary school. This work has included the possibilities of relinquishing the requirement for a 2 ha primary school site, the provision of 'dual-use' open space and sports facilities that would serve the secondary school and the wider community, and thereby negate the need for the development to provide outdoor sports pitches. This situation is now reflected in the agreed revised policy text. The Consortium's position is that these areas, together with a pro-rata allowance for the proportion of the school site requirement generated by the development, would be deducted from the overall school site area, leaving a residual amount to be purchased by the Local Education Authority at a price to be negotiated in the future, which would be at least Benchmark Land Value.

Whilst the Consortium wishes to agree an outline methodology now for how the cost of the secondary school site will be calculated the Partnership disagrees with this approach. The Consortium consider that, unless these principles are established and agreed at this stage, it is not possible to properly assess the site's viability and therefore deliverability. The Partnership argue instead that this can be more effectively resolved at the planning application stage, when all the necessary information is available for consideration.

The Partnership agrees that the negotiation on the purchase price for the residual land area will need to take place in the future between the Consortium and the Local Education Authority. The revised policy clearly sets out the requirements for education and formal open space should a secondary school be required on the site. This provides a clear basis on which those future negotiations could take place and to ensure that the landowner will receive a reasonable incentive for them to sell their land.

4. Viability Implications for Providing the 12 ha Secondary School Site

The Consortium consider that the viability of the site should be assessed at plan-making stage, and policy requirements such as affordable housing adjusted as necessary, as recommended by the NPPF and as indicated would be the case in the GNLP Viability Study (para 56 and 57). The Consortium also takes the view that the land value of this site should not be unfairly impacted by this strategic infrastructure burden and the impact should be value neutral. Because the possible obligation to provide a secondary school is not generated solely or even primarily by the quantum of development at GNLP0132.

Furthermore, the landowners' position is that, unless accommodating the strategic infrastructure has no negative impact on the land value, the site will not be made available for development.

The Partnership considers that the need for a secondary school is imperative to the effective master-planning of the wider North East Growth Triangle, and that site GNLP0132 is integral to achieving this strategic aim and to ensure that there are sufficient school places available to meet the needs of existing and new communities as clearly expected by paragraph 95 of the NPPF. The safeguarding of land for a secondary school on site GNLP0132 is the only reasonable alternative to provide security of such provision.

The Partnership considers that it has undertaken a proportionate assessment of viability. The Partnership accepts that guidance states that in certain circumstances a more detailed assessment may be required for key sites on which the plan relies. However, in this instance the degree of uncertainty over abnormal costs, compounded by the disagreement between the Partnership and Consortium about inputs in the viability assessment clearly indicates that such work in advance of the submission of the plan would not have been the most effective mechanism to address the viability of the site in this instance.

As such, the Partnership's approach has been to engage with the Consortium in order to understand the site's challenges through the Statement of Common Ground process, and accepted that a viability assessment to be assessed at the planning application stage when all abnormal costs are known would be the most effective mechanism to enable this site to be delivered, and to ensure that the landowner receives a reasonable incentive for them to sell their land.

5. The Implications of Accommodating other Strategic Infrastructure

During discussions about the delivery of GNLP0132, it has come to attention that Anglian Water may require a new terminal pumping station to serve this site and the wider North East Norwich area. Whilst no further details have been provided to date, it is possible that the obligation of providing a new terminal pumping station could fall to GNLP0132. The Partnership and Consortium both recognise the possibility of needing to accommodate strategic infrastructure on GNLP0132, such as a terminal pumping station.

The Partnership has elsewhere in this Statement of Common Ground already accepted that this site should justifiably be subject to application level viability assessment. The uncertainty about the need for a terminal pumping station provides even more reason to believe that this is the most effective approach in this instance.

Greater Norwich Local Plan (GNLP)

Signed on Behalf of the Greater Norwich Development Partnership Mike Burrell	24.02.2022
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Signed on behalf of the Consortium and Trustees Sarah Hornbrook	24.02.2022
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