

Date: 10 March 2020
Your Ref:
Our Ref: 004/2019/05
Email: john@johnlongplanning.co.uk
Tel: 01508 538218

Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX

Dear Local Plan Team

Persimmon Homes (Anglia) and Taylor Wimpey (East Anglia) Response to Greater Norwich Local Plan (Regulation 18) Policy HET 1: Land North of Hethersett

I am instructed by Persimmon Homes (Anglia) and Taylor Wimpey (East Anglia) to respond to the current Greater Norwich Local Plan (Regulation 18) consultation specifically in relation to Policy HET 1: Land North of Hethersett. Persimmon and Taylor Wimpey own the site, which has the benefit of planning permission and is implemented, with some early development phases already built out.

Background

The original Hethersett North outline application 2011/1804/O was consented on 22 July 2013. The original outline application site (excluding the park and ride extension) extends to approximately 83.6 hectares and limits the total number homes to 1,196 units.

The original outline application required compliance with approved parameter plans, including for layout, land use and density. The site developers (Persimmon Homes (Anglia) and Taylor Wimpey (East Anglia)) have submitted and had approved a number of Reserved Matters (Phases 1 and 2). The Reserved Matters for the rest of the permitted units approved by the outline consent (1,196 units) will be submitted by early 2021. So far, approximately 320 units of the 1,196 units have been completed. The 1,196 units approved by the outline consent are anticipated to be completed by 2025. The Reserved Matters approvals have been consistent with the approved parameter plans (certain of the plans, such as density included density ranges, rather than set figures).

The Reserved Matters applications have been efficient in the use of land, with development densities approved towards the upper end of the density ranges. This has resulted in the housing total (1,196 units) being met, with additional land left undeveloped within the redline area and within the identified developable land as indicated on the land use parameter plan (Phase 4 on the phasing plan).

Sufficient open space land and other land uses required by the consent have been accommodated in accordance with approved parameter plans without needing the undeveloped land. There are no other land use requirements of the outline consent that need to be accommodated within the undeveloped land (Phase 4).

An opportunity therefore exists to accommodate additional residential units within land already identified for residential development in the parameter plans supporting the outline consent and within the land allocated for development in the Local Plan.

It is acknowledged that to secure the additional 'uplift' in residential unit numbers a new consent will be required, which will need to take account of any new policies adopted since the outline consent was granted; including contributions to CIL and providing 'on-site' requirements such as open space, access, utilities infrastructure/capacity reinforcement etc. necessary to support the 'uplift'.

It is also acknowledged that any application for an 'uplift' in unit numbers will need to be supported by technical information to demonstrate that the scheme can be accommodated within infrastructure limits,

or mitigations can be put in place (i.e. utility reinforcements) and without having a residual significant environmental impact. The technical work has been commenced and consists of :

- Highways
- Utilities
- FRA/drainage
- Ecology
- Arboricultural

An EIA Addendum (addendum to the original outline application (revised Environmental Statement) will also be prepared, to consider the environmental impacts of the uplift, taking into account cumulative effects, including recent planning commitments not considered at the outline stage; new legislation and changes in baseline information.

The current intention is to prepare and submit an outline application for the 'uplift' area later in 2020, once the technical work and EIA work has been completed.

Response to GNLP Consultation – Policy HET1: Land North of Hetherset

Persimmon Homes (Anglia) and Taylor Wimpey (East Anglia) support the Greater Norwich Local Plan's acknowledgement that the site HET 1: Land north of Hetherset is capable of accommodating additional housing units beyond the previous allocation figures (1,080 units) and the information and evidence described above will give the Authorities confidence and comfort that the developers are actively progressing the existing consent's build-out; and are pro-actively working to obtain consent for the uplift numbers. The aim is to have a continual pipeline of completions up to 2028 of around 125-150 units per year.

The work undertaken so far on the 'uplift' element of the site would suggest that an uplift of approximately 200 units over the original 1,196 units permitted by the outline consent is deliverable (around 1,400 units in total), and there may be scope for more units beyond 200 units to be accommodated within land and infrastructure/open space capacity limits. This additional amount (up to 250 units beyond the consented 1,196 units) is currently being tested.

However, Persimmon Homes (Anglia) and Taylor Wimpey (East Anglia) are concerned that the inference in the 'Notes' section accompanying Policy HET 1 suggests that the Policy provisions in Policy HET 1 should be addressed by the 'uplift' proposals, without acknowledging that many of the Policy's provisions have already been met, or will be met through the discharge of conditions and S106 obligations already in place as part of the original outline consent and are therefore no longer applicable or relevant in terms of the 'uplift' element of the site. It is noted that the Policy HET 1 is updated to make reference to additional dwellings (1,369), but the rest of the Policy appears to be the same as the previous site allocations document, without acknowledging that some of the policy provision are not now relevant.

For instance, the Masterplan and Phasing Plan for the allocation has been submitted and approved (without site HET 2 which is not in Persimmon Homes (Anglia) and Taylor Wimpey (East Anglia) control; the improvements to Thickthorn are being delivered through S106 agreements; strategic gap matters are not relevant to the 'uplift' site; and access to Colney Lane and the footpath and cycle route to the NRP is already delivered etc.

Persimmon Homes (Anglia) and Taylor Wimpey (East Anglia) suggest therefore that it is not possible or appropriate for the 'uplift' proposals to take account of many of the policy requirements as set out in Policy HET 1, and the concern is that the simple roll forward of the policy requirements could render the uplift application undeliverable if they all need to be addressed.

Furthermore, past experience would suggest that Local Plan Inspectors generally prefer committed sites (i.e. those with planning permission) not to be identified as 'allocations' in Local Plans and rather that



they should be shown with a specific 'site with planning permission' designation and with settlement/development boundaries extending around them.

Finally, it is not clear what is meant by the section in the 'Notes' section that "...the remainder of GNLPO177-A is not preferred for allocation..".

Suggested changes

Persimmon Homes (Anglia) and Taylor Wimpey (East Anglia) suggest that rather than simply roll forward the previous Local Plan allocation and Policy HET 1 Land North of Hethersett in its entirety, the Local Plan should acknowledge that the 'allocation', is now a committed site (i.e. with planning permission) that has been implemented and is therefore extant in perpetuity and should be notated as such; and that the Local Plan Policy HET 1 should be updated to only include requirements that are relevant to the 'uplift' scheme and not development that is already consented or built.

Conclusion

In conclusion, Persimmon Homes (Anglia) and Taylor Wimpey (East Anglia) supports the Local Plan's acknowledge that the site HET 1: Land North of Hethersett is capable of accommodating additional residential units beyond those identified in the previous Site Allocations Plan (1,080 units) and permitted by the outline consent (1,196 units). Technical and design work undertaken so far suggests that a figure of at least an additional 200 units may be accommodated within existing land and infrastructure capacity limits and this design and technical information can be made available to the Authorities shortly.

However, Persimmon Homes (Anglia) and Taylor Wimpey (East Anglia) do not think it appropriate for the Policy HET 1 to be rolled forward in its entirety without acknowledging that planning consent has been granted and many of the Policy's requirements are met through that process, as evidenced in planning conditions and the s106 agreement. Rather it should only include policy requirements that are relevant to the 'uplift' site proposals.

Persimmon Homes (Anglia) and Taylor Wimpey (East Anglia) remain very happy to continue to work with the Authorities to clarify those Policy HET 1 requirements that remain relevant to the 'uplift' site, and those that are not including those that have been/are being dealt with by the original consent (and associated reserved matters) conditions and s106 obligations related to the original implemented consent.

Should you require any further information, please do contact me.

Yours sincerely

John Long BA (hons) DipTP, MRTPI

Director

Encl. Completed regulation 18 consultation form

Greater Norwich Local Plan

Regulation 18 Draft Plan Consultation

Response Form

Thank you for responding to the Regulation 18 Draft Plan Consultation on the emerging Greater Norwich Local Plan.

The current consultation runs from. **29th January to 16th March 2020.**

It covers the **Strategy and Site Allocations**. We need to get views on these documents to help us draw up the version of the plan which will be submitted to the Planning Inspectorate.

When commenting on a policy or site, please include the site reference(s) in your comments.

If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email gnlp@norfolk.gov.uk

It is easier to respond online at www.gnlp.org.uk . If you cannot do this, please use this form to respond to the consultation on new, revised and small sites.

Consultation documents are available from www.gnlp.org.uk. There are also supporting documents which provide information on our policies and sites which may help you to make your comments.

Hard copies of the documents are available at consultation “Deposit Points” at:

- County Hall, Martineau Lane, Norwich (main reception);
- City Hall, St Peters Street, Norwich (2nd floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

Submitting your Response Form

Responses should be submitted by email to gnlp@norfolk.gov.uk or completed hard copy forms should be sent to:

*Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX*

**All submissions should be made no later than 5pm on
Monday 16th March 2020.**

1a. Contact Details	
Title	Mr
First Name	John
Last Name	Long
Job Title (where relevant)	Planning Consultant
Organisation (where relevant)	John Long Planning Ltd
Address	45 The Street Surlingham Norfolk
Post Code	NR14 7AJ
Telephone Number	01508 538218
Email Address	John@johnlongplanning.co.uk

1b. I am...	
Owner of the site <input type="checkbox"/>	Parish/Town Council <input type="checkbox"/>
Developer <input type="checkbox"/>	Community Group <input type="checkbox"/>
Land Agent <input type="checkbox"/>	Local Resident <input type="checkbox"/>
Planning Consultant <input checked="" type="checkbox"/>	Registered Social Landlord <input type="checkbox"/>
Other (please specify):	

1c. Client/Landowner Details (if different from question 1a)

Title	
First Name	See below
Last Name	See below
Job Title (where relevant)	
Organisation (where relevant)	Hethersett Consortium of Persimmon Homes (Anglia) and Taylor Wimpey (East Anglia)
Address	<p>Attention: Laura Townes</p> <p>Persimmon Homes (Anglia)</p> <p>Persimmon House</p> <p>Bankside 100, Peachman Way</p> <p>Broadland Business Park</p> <p>Norwich</p> <p>Norfolk NR7 0WF</p> <p>Attention: Jordan Last</p> <p>Taylor Wimpey East Anglia</p> <p>Castle House</p> <p>Kempson Way</p> <p>Bury St Edmunds</p> <p>Suffolk</p> <p>IP32 7AR</p>
Post Code	
Telephone Number	c/o Agent
Email Address	

Please make your comments below. You can comment on more than one policy or site on this form. Please clearly state the reference number of the policy or site your comments refer to.

Policy or site reference	Comments
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Policy HET 1: Land North of Hetherset

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Please add additional sheets if necessary

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Disclaimer

Data Protection and Freedom of Information

The Data Controller of this information under the General Data Protection Regulation (GDPR)2018/Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

Once comments have been checked and verified they will be available online (with respondents' names) for others to see. Any representations which are deemed to contain offensive comments will be removed from the consultation site. Whilst we will include names on our website, we will remove personal contact details such as addresses, telephone numbers, emails and signatures before publishing.

If you wish to comment but feel that you have a strong reason for your identity to be withheld from publication, you can contact your District Councillor who will put forward your comments as appropriate. Please note that where you submit your views in writing to your local District Councillor, this is described as "lobbying" and the local member will be obliged to pass these on. The local District Councillor will be required to provide your details to the GNLP where they will be stored for their records.

Please note, however, that if you subsequently wish to comment as part of the formal Regulation 19 stage of the Greater Norwich Local Plan (due to take place in 2020) comments must be attributable for the public examination by the Planning Inspectorate.

See our Privacy notice here <http://www.greaternorwichlocalplan.org.uk/> for information on how we manage your personal information.

Declaration

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name

John Long

Date

12 March 2020

Greater Norwich –Regulation 18 Draft Local Plan Response Form

FOR OFFICIAL USE ONLY

Response Number:

Date Received:

Your completed form should be returned to the Greater Norwich Local Plan team **no later than 5pm on Monday 16 March 2020.**

If you have any further questions about the ways to comment, or if you need consultation documentation in large print, audio, Braille, an alternative format or a different language, you can email us at gnlp@norfolk.gov.uk or phone us on 01603 306603.