

GNLP – REGULATION 18(C) CONSULTATION RESPONSE

GNLP0133-C - UEA

On behalf of the UEA, we strongly support the preferred allocation of GNLP0133-C, Land North of Cow Drive (the Blackdale Building, adjoining Hickling House and Barton House). The site is entirely deliverable, and capable of making a significant contribution towards facilitating the UEA's forecasted student growth and expansion of its estate up to 2038.

GNLP0133-C has been identified as a preferred allocation for student accommodation (minimum of 400 bed spaces), which may include a small element of ancillary university related uses. The site is currently allocated under Policy R40 of the Adopted Development Plan, identified in the 2010 DFS, and benefits from extant planning consent (reference: 15/00121/F, which has seen phase 1 completed, for student accommodation). The site comprises the existing undeveloped part of the Blackdale allocation, currently consented as Phase 2, which will deliver student accommodation in two blocks (Blocks C and D). Consequently, GNLP0133-C has been identified as a preferred allocation due to the principle of development being established by virtue of the existing allocation and extant planning consent.

Whilst the National Planning Policy Framework's (NPPF) definition of 'deliverable' relates to residential development, the definition provides a useful framework to assess the deliverability of all sites, regardless of their proposed uses. In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site within the plan period, and is viable.

Assessment of Delivery

Suitable

The site falls within the UEA campus, which is a world class research university, being a leader in creative writing, life and environmental sciences. The presence of the UEA in Norwich has significantly contributed to Norwich's recent economic, social and cultural growth. The UEA's presence has enabled Norwich to attract many young, skilled workers to the area and, importantly, helped retain them locally. The UEA's graduate retention rate is one of the highest in the country at around 22% (2014/2015 academic year). It means that Norwich has a skills base that would not otherwise be available and gives it a higher proportion of young, economically active people compared to much of the UK.

The intellectual capital brought to Norwich by having the UEA cannot be underestimated, contributing £1.04 billion to the UK economy. It has provided a rich vein of researchers and scientists, as well as talented and creative people, that have been integral to Norwich's growth into the knowledge economy and expansion of its creative industries. It is this intellectual capital, generated by the UEA, as part of the Norwich Research Park, which places Norwich in a prime location as part of the Norwich-Cambridge tech corridor initiative. The UEA has also provided job and learning opportunities for local people already living in the City.

At present, the UEA employs more than 3,800 staff (5% of all Norwich employment), around 2,800 of whom are full time. More than 1,000 members of staff are academic, including around 400 researchers, administrators, support, technical and general staff make up just over 1,750 in total. The UEA has an estimated annual income of some £270 million, and is estimated to be responsible for generating an economic impact of some £468 million in Norwich (equivalent to 1.5% of all Norfolk GVA) and £1.04 billion on the UK (Connecting People and Places, UEA, 2019).

In 2010, the UEA had a student population of approximately 15,000 students. The UEA's student population increased to 17,195 students (2016/2017 academic year). This is a significant increase from student growth forecasts in DFS 2010, which projected a modest increase in student numbers of 1,000 - 2,000 to 2030. Based on the UEA's growth forecasts,

it is likely that the student population will increase to 22,000 by 2035/2046, which results in an increase in 22% (a net increase of 4,805 students in approximately 20 years).

As a result, the identification of the site as a preferred allocation will help to support the expansion of the UEA, alongside sustaining and enhancing the valuable role which the UEA holds for Norwich and the wider context. The UEA are fully committed to development on this site, and view it as an integral part of meeting the UEA's future growth requirements.

Historic England

In early 2020, Historic England consulted on the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188). Representations were submitted by the UEA, recognising that the designation of the Historic Parkland would impact upon the continued prosperity and growth of the UEA. Notwithstanding this, regardless of whether the landscape is designated as a Historic Parkland, development on this site will be designed in a manner to respect the visual setting of the UEA, whilst facilitating the growth and expansion of the UEA.

Affordable Housing Provision

The preferred allocation outlines that development on the site should provide affordable housing. However, it is sought to delete this requirement from the preferred allocation's wording. This is due to the fact that Policy 5 of the draft GNLP recognises that the development of purpose built student accommodation within the UEA Campus does not need to provide affordable housing (whereas, development outside of the UEA Campus does).

Available

The site, in its entirety, is owned by the UEA, and there are no leases or restrictive covenants on the site. The availability of the site has been demonstrated by the extant planning consent on the site. Consequently, the site is readily available for development.

Achievable

Based on the suitability assessment above, there are no site-specific constraints which could preclude the delivery of student accommodation on the site. In addition the achievability of the site has been demonstrated by the extant planning consent on the site. Therefore, the development of student accommodation on the site is deemed to be entirely achievable.

Viable

We are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site.

The viability of development on the site has been demonstrated by Phase 1 (Blocks A and B), which have been completed on the site.

Summary

The UEA is a highly sustainable location for growth. Development at the UEA will help support and sustain the long-term forecasted growth of the University Campus, alongside enhancing the UEA's role as a world class research university. Furthermore, development at the UEA will help to sustain and enhance the important role of the UEA to Norwich and the wider UK's economy, alongside supporting the Norwich to Cambridge tech corridor, as a key part of the Norwich Research Park.

As has been demonstrated, the site is suitable, available, achievable and viable, and is deliverable within the plan period. As previously recognised, there are no constraints which would affect the suitability of the site for student accommodation. Accordingly, the foregoing text demonstrates that this specific site is a suitable location for development, and the UEA support the GNLP's proposals to re-allocate the site under GNLP0133-C student accommodation, subject to the proposed revisions to the policy wording..

Revised Policy Wording

Land north of Cow Drive (the Blackdale Building, adjoining Hickling House and Barton House, University of East Anglia, 0.89 hectare) is allocated for student accommodation development which may include a small element of ancillary university related uses. The site is expected to accommodate a minimum of 400 student bedrooms, ~~and is to provide affordable housing in accordance with policy 5, subject to viability considerations.~~

- The development will achieve the following site-specific requirements:
- Achievement of a high quality, ~~locally distinctive~~, energy efficient design whose form and massing takes account of its location on the fringe of the campus, complements and integrates with existing adjoining development and respects the design and heritage significance of the main part of the campus.
- High quality landscaping, planting and biodiversity enhancements to reduce the impact of built development, providing for the retention and enhancement of existing landscape features and the protection, enhancement and management of and public access to the adjacent Blackdale Plantation;
- Linking development to the university district heating network, where feasible and viable to do so or providing alternative on site facilities where these are considered to minimise impacts which might arise from connection to the national grid.
- Access arrangements to the site will be in accordance with the approved planning permission, unless otherwise agreed with the Local Planning Authority in consultation with the Local Highway Authority.

Key

Amendment – Proposed Amendments

~~Deleted~~ – Proposed Text to be Removed

GNLP – REGULATION 18(C) QUESTION RESPONSES
UEA – GNLP0133-B, GNLP0133-C, GNLP0133-D, GNLP0133-E,
GNLP0140-C

GNLP REGULATION 18(C) QUESTIONS	RESPONSES
1. Please comment on or highlight any inaccuracies within the introduction.	No comments.
2. Is the overall purpose of this draft plan clear?	Yes.
3. Please comment on or highlight any inaccuracies within the spatial profile?	No comments.
4. Are there any topics which have not been covered that you believe should have been?	No comments.
5. Is there anything that you feel needs further explanation, clarification or reference?	No comments.
6. Do you support or object to the vision and objectives for Greater Norwich?	<p>Support, with comments.</p> <p>The UEA are fully supportive of the Vision for Greater Norwich, which seeks to support a diverse low carbon economy which will compete globally through its world class knowledge-intensive jobs in the Cambridge Norwich Tech Corridor. Moreover, the UEA are supportive of the plan's economic objectives of supporting the expansion of internally important knowledge-based industries in the Cambridge Norwich Tech Corridor, as part of an entrepreneurial, enterprising, creative economy.</p>
7. Are there any factors which have not been covered that you believe should have been?	No comments.
8. Is there anything that you feel needs further explanation, clarification or reference?	No comments.
9. Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?	<p>Support, with comments.</p> <p>The requirement that sites should only be allocated for housing where, having regard to policy requirements, there is a reasonable prospect that housing can be delivered, fully accords with paragraph 67 of the NPPF.</p>

	<p>As has been outlined within the Representations for the preferred allocations of GNLP0133-C and GNLP0133-E, both sites are suitable, available, achievable and viable, and are deliverable for student accommodation.</p> <p>The submission of Delivery Plans as part of a planning applications is supported. The documents do, however, need to recognise that there may be unforeseen material changes in circumstances, which could impact upon the delivery of an allocation.</p> <p>The Council's approach to providing choice and flexibility in terms of housing growth by accommodating 9% more homes than are needed, along with contingency sites, is supported. This buffer will help maintain the supply and delivery of housing, which includes purpose built student accommodation, in accordance with the NPPF.</p>
<p>10. Do you support, object, or have any comments relating to the approach to Economic Development set out in the Delivery Statement?</p>	<p>Support, with comments.</p> <p>The UEA are fully supportive of the fact that the identified growth offers the opportunity to strengthen Norwich's role as a key part of the national economy, particularly through the Cambridge Norwich Tech Corridor.</p> <p>The Delivery Statement recognises that strategic sites are identified to promote growth in the knowledge-intensive sectors. The identification of the preferred allocations of GNLP0133-B, GNLP0133-D and GNLP0140-C will directly help to promote growth in the knowledge-intensive sectors. The preferred allocations of GNLP0133-C and GNLP0133-E, which are for predominantly student accommodation, will help support the role of enhancing the UEA, with the overarching purpose of promoting growth in the knowledge-based sectors.</p>
<p>11. Do you support, object, or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?</p>	<p>Support, with comments.</p> <p>Whilst there is support, in principle, for the proposed approach to infrastructure, particularly the need for key stakeholders to work collaboratively, the Delivery Statement should make it clear that infrastructure requirements will be proportionate to each development and based on clear assessments of need. Failure to do this will result in certain developments being financially unviable and, therefore, undeliverable.</p>
<p>12. Do you support, object, or have any comments relating to the Climate Change Statement?</p>	<p>Support, with comments.</p> <p>UEA are supportive of the consideration being given to ensuring that development is created to be resilient to the impacts of climate change. The UEA boasts some of the best climatic research in the country, being a leader in the field of environmental research, and is committed to replicating this success in how the campus and surrounding environment is managed and developed.</p> <p>Following on from adopting a low energy/carbon agenda in the early 1990s, the UEA has sought to develop the campus in a way that reduces environmental impacts, through long-term planning. Examples of the UEA's dedication to achieving low carbon development is The Enterprise Centre, which is the first large-scale building to achieve both Passivhaus Certification and BREEAM Outstanding, which result in it being one of the UK's most sustainable academic buildings.</p> <p>Accordingly, the design principles encompassed in the Climate Change Statement are supported. It will be sought, where viable and achievable to do</p>

	so, to design GNLP0133-B, GNLP0133-C, GNLP0133-D, GNLP0133-E, and GNLP0140-C, to low carbon standards.
13. Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?	<p>Support, with comments</p> <p>The proposed Settlement Hierarchy and the identification of the UEA as part of the Norwich Urban Area is supported. The UEA is a world class research university, being a leader in creative writing, life and environmental sciences. The presence of the UEA in Norwich has significantly contributed to Norwich's recent economic, social and cultural growth. The UEA's presence has enabled Norwich to attract many young, skilled workers to the area and, importantly, helped retain them locally.</p> <p>Therefore, the UEA support the scale of growth directed to the Norwich Urban Area, including 4,395 new dwellings. Development on GNLP0133-C and GNLP0133-E will help to support and meet a particular area of housing growth in the Norwich Urban Area.</p>
14. Do you support, object or wish to comment on the approach for housing numbers and delivery?	<p>Support, with comments.</p> <p>For reasons outlined in relation to Question 12, the UEA fully support the identification of the Norwich Urban Area as a location to accommodate additional growth.</p>
15. Do you support, object or wish to comment on the approach for the Economy?	<p>Comments.</p> <p>Whilst it is appreciated that the UEA does not solely comprise a strategic employment location, it is suggested that the policy is amended to reflect the valuable role which the UEA provides to the Norwich and UK economy. The UEA contributes £1.04 billion to the UK economy, of which £468 million is retained within Norwich.</p> <p>Accordingly, development on GNLP0133-B, GNLP0133-C, GNLP-133-D, GNLP0133-E and GNLP0140-C will help support and sustain the important contribution of the UEA to the economy.</p>
16. Do you support, object or wish to comment on the approach to Review and Five-Year Land Supply?	<p>Support, with comments.</p> <p>The proposed review of the plan 5 years after adoption is fully consistent with paragraph 33 of the NPPF.</p>
17. Do you support, object or wish to comment on the approach to Infrastructure?	<p>Support, with comments.</p> <p>The need to support sustainable growth through the provision of infrastructure improvements is, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development.</p>
18. Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?	No comments
19. Do you support, object or have any comments relating to the specific requirements of the policy.	No comments.

20. Do you support, object or have any comments relating to approach to the built and historic environment?	Support, with comments. The UEA are supportive of the strategy to ensure that development proposals conserve and enhance the built, historic and natural environment.
21. Do you support, object or have any comments relating to the approach to the natural environment?	As outlined within the Representations for GNLP0133-B, GNLP0133-C, GNLP0133-D, and GNLP0133-E, Historic England consulted on the potential designation of the landscape surrounding the UEA as Historic Parkland (Case: 1466188). Notwithstanding this, regardless of whether the landscape is designated as Historic Parkland, development on each site will be designed in a manner to respect the visual setting of the UEA, whilst facilitating the growth and expansion of the UEA.
22. Are there any topics which have not been covered that you believe should have been?	No comments.
23. Do you support, object or have any comments relating to approach to transport?	Support, with comments. The UEA are supportive of improvements to transport infrastructure to develop the role of Norwich, and support the Cambridge Norwich Tech Corridor. More specifically, the UEA are supportive and dedicated to the provision of a cross valley transport link between the UEA and the wider Norwich Research Park, alongside significant improvements to the bus, cycling and walking networks around this area.
24. Do you support, object or have any comments relating to the approach to other strategic infrastructure (energy, water, health care, schools and green infrastructure)?	No comments.
25. Do you support, object or have any comments relating to the approach to on-site and local infrastructure, services and facilities?	Support, with comments. The need to support sustainable growth through the provision of infrastructure improvements is, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development (with reference to the type of development proposed), based on a local need, and must not undermine delivery.
26. Are there any topics which have not been covered that you believe should have been?	No comments.
27. Do you support, object or have any comments relating to approach to affordable homes?	Comments. Policy 5 of the draft GNLP highlights that outside of the UEA Campus, provision should be made to deliver a quantum of affordable housing that would be expected if the site was developed for general housing needs. Accordingly, given that GNLP0133-C and GNLP0133-E are proposed for purpose built student accommodation on the UEA Campus, neither site should be required to provide affordable housing. This has been reflected in each individual Representation for both sites, with proposed amendments to each preferred allocation policy wording.

28. Do you support, object or have any comments relating to the approach to space standards?	<p>Comments.</p> <p>The Nationally Described Space Standards are only applicable to individual residential dwellings, and are not applicable to purpose built student accommodation. Accordingly, accordance with the space standards should not be sought for GNLP0133-C and GNLP0133-E.</p>
29. Do you support, object or have any comments relating to the approach to accessible and specialist Housing?	No comments.
30. Do you support, object or have any comments relating to the approach to Gypsies and Travellers, Travelling Show People and Residential Caravans?	No comments.
31. Do you support, object or have any comments relating to the approach to Purpose-built student accommodation?	<p>Support, with comments.</p> <p>The UEA are supportive of the recognition in Policy 5 that development proposals for purpose-built student accommodation will be supported in accordance with the UEA DFS. Therefore, the principle of purpose built student accommodation on GNLP0133-C and GNLP0133-E is supported.</p> <p>As outlined in Question 27, Policy 5 confirms that only purpose-built student accommodation constructed outside of the UEA Campus should provide affordable housing provision. It is supported that purpose-built student accommodation within the UEA Campus should not provide affordable housing.</p> <p>Accordingly, within each Representation for GNLP0133-C and GNLP0133-E, proposed amendments to both preferred allocation's are made, omitting reference to affordable housing provision.</p>
32. Do you support, object or have any comments relating to the approach to Self/Custom-Build?	No comments.
33. Are there any topics which have not been covered that you believe should have been?	No comments.
34. Do you support, object or have any comments relating to the approach to employment land?	No comments.
35. Do you support, object or have any comments relating to the approach to tourism, leisure, environmental and cultural industries?	No comments.
36. Do you support, object or have any comments relating to the sequential approach to development of new retailing, leisure, offices and other main town centre uses?	No comments.

37. Are there any topics which have not been covered that you believe should have been?	No comments.
38. Do you support or object or wish to comment on the approach for the city centre? Please identify particular issues.	No comments.
39. Do you support or object or wish to comment on the approach for East Norwich? Please identify particular issues.	No comments.
40. Do you support or object or wish to comment on the approach for elsewhere in the urban area including the fringe parishes? Please identify particular issues.	No comments.
41. Do you support or wish to comment on the approach for the main towns overall? Please identify particular issues.	No comments.
42. Do you support or object or wish to comment on the approach for specific towns?	No comments.
43. Do you support or object to or wish to comment on the approach for the key service centres overall?	No comments.
44. Do you support or object or wish to comment on the approach for specific key service centres?	No comments.
45. Do you support or object or wish to comment on the overall approach for the village clusters?	No comments.
46. Do you support or object or wish to comment on the approach for specific village clusters?	No comments.
47. Do you support or object or wish to comment on the overall approach for small scale windfall housing developments?	No comments.
48. Do you support or object or wish to comment on any other aspect of the draft plan not covered in other questions?	<p>The Greater Norwich Local Plan, Interim Viability Study, prepared by NPS Group (November 2019), only covers mainstream residential development, and not UEA related academic development or purpose-built student accommodation.</p> <p>Notwithstanding this, the UEA are confident that the delivery of GNLP0133-B, GNLP0133-C, GNLP0133-D, GNLP0133-ER and GNLP0140-C are viable,</p>

	<p>having regards to the policy requirements of the draft GNLP, alongside no factors that UEA are aware of, at this moment in time, which could prevent delivery of these sites. However, given the duration of the plan period, it is important that there is sufficient flexibility within the plan to re-visit the viability of development projects/sites as they come forward and to reflect any changes in circumstances which could question the viability of fulfilling all policy requirements set out within the plan.</p>
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