

GNLP – REGULATION 19 CONSULTATION RESPONSE POLICY HEL1 – HELLESDON HOSPITAL

On behalf of Norfolk and Suffolk NHS Foundation Trust (the Trust), we continue to strongly support the allocation of Hellesdon Hospital under Policy HEL1 for approximately 300 homes and employment uses. As detailed in comments made at the Regulation 18 (C) consultation stage, the site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2038.

The continued suitability of the site is detailed below. In considering the suitability of the site regard has been given to the specific requirements of Policy HEL1, as well as additional technical work, and discussions with key stakeholders, including Broadland District Council and Norfolk County Council Highways, that have taken place since the Regulation 18 (C) consultation.

However, whilst the principle of the policy is considered sound, in accordance with the tests set out in paragraph 35 of the NPPF, elements of the detailed wording are not sound, as they are neither effective or justified. Accordingly, minor alterations to Policy GNLP HEL1 are sought to ensure its soundness. These are considered in further detail below.

Confirmation of Delivery

Suitable

Hellesdon is identified as being part of the Urban Area. Norwich and the Urban Area are identified as the location to accommodate 66% of the housing growth during the period to 2038, on the basis that is the most sustainable location within the Greater Norwich area and is the focus for significant economic growth.

Within the Urban Area, Hellesdon represents a highly sustainable location with good access to Norwich, that has been significantly enhanced by the recent delivery of the Broadland Northway. Accordingly, Hellesdon provides a wholly suitable location for additional growth.

The suitability of the site for development is recognised by its allocation in the Adopted Development Plan. The site is in the sole ownership of the Norfolk and Suffolk NHS Foundation Trust who remain committed to the redevelopment of the site. The site is due to be released following a phased relocation of services, which may require parcels of the site, notably land to the north, to be disposed of first in order to facilitate the provision of enhanced health care facilities, which subsequently enables other parts of the site to be vacated and developed.

Density and Quantum of Development

Draft Policy HEL1 identifies the site as being suitable to accommodate approximately 300 homes. However, the preferred allocation also suggests that more homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints being addressed; an approach that is fully supported.

Based on a development of 300 units and the identified site area of 14.7 ha, the density of development equates to 20 dwellings per hectare. However, this density is lower than the indicative minimum densities set out in Policy 2 of the draft GNLP, which seeks a minimum of 25 dwellings per hectare (net).

An Indicative Masterplan prepared by LSI and submitted in support of this representation (See Appendix 1) demonstrates how the site could potentially be delivered to provide approximately 350 units, having regard to requirements in relation to, amongst other things, open space, as well the requirement to retain certain heritage assets.

Accordingly, it is evident that the site is capable of providing the minimum number of homes the policy seeks to accommodate on the site, whilst having the potential to accommodate more than 300 units, subject to detailed design considerations.

Uses

The principle of a residential led mixed use development is supported. However, the policy should make it clear that alternative uses, notably employment, will only be required where there is a clear need for the use. In addition, in order to ensure the policy is flexible and capable of responding to changing circumstances, as well as consistent with the NPPF, it should recognise that other non E (g) uses, which are capable of generating employment, will, in principle, be permitted on site. For example, certain care uses falling within Class C2 are capable of generating significant levels of employment. This approach would, in accordance with Policy 5 Homes also ensure that, subject to need, the development could incorporate specialist housing.

Access, Transport and Roads

Draft Policy HEL1 advises that vehicular access to the site will be required to be taken from Drayton High Road and Hospital Lane. However, it has become apparent through discussions with both Broadland District Council and Norfolk County Council highways that it is not possible to provide access from Hospital Lane.

More specifically, it has become evident that access from Hospital Lane is dependent on the demolition of The Weavers Building and the associated car park. The Weavers building is currently used to provide a range of core services for Trust staff. Whilst the land is within the ownership of the Trust it is let on a long lease (expiring 2119) and the Trust have no right for an early termination of the lease. Whilst the Trust are seeking to terminate the lease, it cannot be assumed that the land can be incorporated into any development.

In addition, work undertaken by the Trusts highways consultants has demonstrated that the retention of The Weavers building would mean that a junction could not be provided onto Hospital Lane that would meet technical highway requirements. It would also involve the demolition of a substantial number of trees that make a significant contribution to the street scene.

On this basis and in order to ensure that the site is deliverable within the plan period, the policy should state that vehicular access will be taken via Drayton High Road, with emergency and pedestrian / cycle access via both the existing Drayton High Road junction and Hospital Lane. An email from Broadland District Council confirming this position following discussions with Norfolk County Council Highways is attached as Appendix 2.

The potential for 'other' off site highway improvements is acknowledged, as is the need for consultation with the Highway Authority. However, the policy needs to be clear that any off-site highway works must be justified and not place unnecessary burdens on the viability of the development, which could question the deliverability of the site. In addition, in determining the requirement for off -site requirements, consideration needs to be given to the impact on site features, notably trees along both Drayton High Road and Hospital Lane.

Accordingly, it is proposed that to ensure that the policy is justified and effective, and therefore, sound that Criterion 2 of the policy is revised to remove reference to a vehicular access being required from Hospital Lane. In addition, Criterion 3 should be revised to state that any off-site highway improvements will be subject to feasibility and viability considerations.

Heritage Assets

Draft Policy HEL1 advises that some of the significant former hospital buildings may constitute heritage assets that are worthy of retention. Whilst the Trust support the principle of preserving heritage assets, the policy should make it clear

that the retention of such buildings is subject to it being demonstrated that their retention is both practical and viable. Failure to do this may adversely impact the and viability of the development. Accordingly, it is requested that Criterion 4 is revised as necessary.

Deliverability and Proposed Housing Trajectory

As detailed above, the Trust own the entirety of the site and are committed to its redevelopment. The Trust have entered pre-application discussions with Broadland District Council and other key stakeholders and, in parallel, have held discussions with a number of housebuilders / developers in relation to the sale of the site.

At this moment in time, it is hoped that Outline Planning Permission could be secured on the site in 2022, before the site is sold to a developer. On this basis, development could potentially start on the site in 2023. Assuming a delivery rate of 50 units per annum, the site could be complete by 2029.

Available

As detailed above, the site is in the control of the Trust who are supportive of a redevelopment of the site. They are in discussions with landowners / developers regarding the sale of the site.

Achievable

There are no site-specific constraints which could threaten the delivery of a residential led redevelopment on the site. The Trust are committed to the disposal of the site and the Housing Trajectory demonstrates that the site will be developed well within the lifetime of the plan.

Viable

We remain 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. This statement is, however, made in the context of the Trust's requirements to generate the maximum receipt from the site, so as to enable investment in the provision of new, modern, health facilities on the site. For example, a reduction in policy obligations, such as affordable housing, will have a direct financial benefit to assist in the provision of enhanced health care.

Summary

Hellesdon represents a highly sustainable location with good access to Norwich, that has been significantly enhanced by the recent delivery of the Broadland Northway. Accordingly, Hellesdon provides a wholly suitable location for additional growth.

As has been demonstrated, the site is suitable, available, achievable and viable, and is potentially deliverable within the first five years of the plan period. As previously recognised, there are no constraints which would affect the suitability of the site for residential development. A draft Statement of Common Ground confirming these points is attached as Appendix 3.

However, whilst the Trust fully supports the allocation of the site under Policy HEL1, to ensure its soundness, minor alterations to the policy are suggested below.

Revised Policy Wording

POLICY HEL1

Land at Hospital Grounds, southwest of Drayton Road, Hellesdon (approx. 14.7 ha) is allocated for Mixed-Uses including residential and employment uses. The site will accommodate approximately 300 homes, and ~~E(g)~~ employment generating uses, **subject to demand**.

More homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints.

The development will be expected to address the following specific matters:

1. A small amount of ~~E(g)~~ employment **generating** uses will, **subject to proven demand**, be considered appropriate ~~e.g. converting existing buildings~~.
2. Vehicular access via Drayton High Road ~~and Hospital Lane~~.
3. A pedestrian crossing is likely to be required on the A1067 Drayton High Road as are improvements to Middletons Lane / A1067 junction. Other off-site improvements to the highway may also be necessary, as required by the Highway Authority, **subject to feasibility and viability considerations**.
4. The site is shown on the historic environment record and therefore further investigation is likely to be required in respect of archaeology. In addition, some of the more significant former hospital buildings may constitute heritage assets that are, **where practical and viable**, worthy of retention.
5. The site falls within Source Protection Zone 3 and therefore pollution control techniques should be incorporated to ensure that development of the site does not lead to pollution of the water environment, including the River Wensum.
6. Norfolk Mineral and Waste Core Strategy Policy CS16 applies as this site is underlain by safeguarded mineral resources.

Key

Strikethrough = Delete

Red Text = Replacement Text

APPENDIX 1
INDICATIVE MASTERPLAN PREPARED BY
LSI



Rev	Int	Date	Revision
B	MM	09.01.19	General update
A	MM	03.01.19	Phasing updated

0m 10 20 30 40 50 60 70 80 90
 Scale 1:1250

lsi
 ARCHITECTS

NORWICH
 The Old Drift Hall
 23a Castle Market Street
 Norwich NR1 3DY
 +44(0)1603 660711

LONDON
 Floor 2
 50-54 Clerkenwell Road
 London EC2M 6PS
 +44(0)20 7278 1739
 www.lsiarchitects.co.uk

Client
Bidwells

Project
Hellesdon Hospital Redevelopment

Title
Sketches
Proposed Masterplan

APPENDIX 2
EMAIL FROM CHARLES JUDSON
(BROADLAND DISTRICT COUNCIL) DATED
29 JUNE 2020

Karen Long

From: Charles Judson <Charles.Judson@broadland.gov.uk>
Sent: 29 June 2020 13:07
To: Iain Hill
Subject: Hellesdon Hospital

Dear Iain

I write further to our previous discussions on this site.

As you will be aware, I provided written advice on 5th July 2019 concerning the principle of the proposal and some key issues which will need to be considered. I do not intend to reiterate this advice which remains relevant but to update the position regarding access arrangements which at the time of the previous email had not been resolved. Further to our recent meetings and discussions the highway authority are now prepared to accept this site coming forward with a single point of vehicular access, initially serving Phase 1 and then later phases. This is subject to the delivery of emergency accesses being provided at the existing hospital access onto the A1067 Drayton High Road and onto Hospital Lane and the delivery of high levels of permeability for cyclists and pedestrians. On the basis that the policy requirement (HEL1) is for access via Drayton High Road and/or Hospital Lane I would consider this compliant with policy.

However, HEL1 also requires the likely provision of pedestrian crossings on A1067 Drayton High Road, improvements to the Middletons Lane/A1067 Drayton High Road junction and other off-site improvements to the highway network as may also be necessary and to date we haven't yet reached a consensus on what package of works may be required. Any application will need to be accompanied by a Transport Assessment and the scope of this should be agreed with the Highway Authority. The Transport Assessment will help inform the nature and extent of what off site works are required. You will also be aware that the highway authority are of the opinion that for the proposed development to be acceptable, mitigation will be required at the A1067/Middleton's Lane/Hospital Lane traffic signal junction and that any such works will need to be shown on the master plan, in addition to any other highway works which are required. You will also be aware that The A1067 is also defined as a strategic bus corridor in the JCS and I would support its delivery subject to consideration over the townscape impacts this may have. If a bus lane is not achievable, the required capacity improvements at the junction should reduce instances and lengths of vehicle queues, improving journey reliability for all traffic which would by definition include public transport, aiding sustainability of the proposed development. The highway authority has identified that the transport consultants should consider options that include two inbound lanes and a 3.0m wide island with staggered crossing at the north-west arm of the junction. Modelling would provide an estimate of queue lengths that could be used to inform required lane lengths.

If it is found that two lanes are needed to accommodate the ahead movement, the pedestrian crossing island at the city side of the junction (to be installed for the RNGC scheme) would need to be removed to accommodate a two lane exit. The consultant would also need to demonstrate that the layout provides sufficient storage for right turning vehicles. Provision of a staggered island at the inbound approach would allow greater scope for an efficient signal staging arrangement and would also provide a good standard crossing facility at the pedestrian/cycle desire line from the development. It is worth noting that bus lanes also provide a facility that for cyclists is safer than the main traffic lane. Should provision of a bus lane not be possible, the highway authority would wish for the developer to investigate feasibility of improving the existing footway to provide a 3.0m shared use footway/cycleway for the whole extent of the site frontage.

It is vital that the scheme is acceptable from a transport capacity and safety perspective and that this is demonstrated in the Transport Assessment and informs the wider masterplanning of the site. I hope however that the above is of assistance and gives sufficient comfort to enable the further work to be progressed.

Please contact me if you need to discuss.

Regards

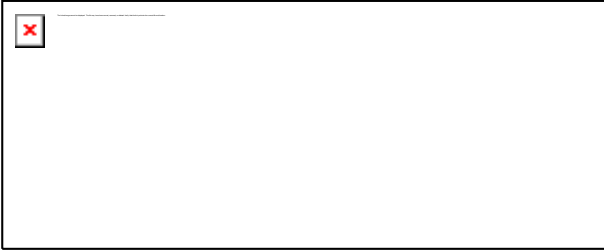
Charles

***** Please note that I am home working but can be contacted using my Broadland email address*****

Charles Judson

Principal Planning Officer

t 01603 430592 e charles.judson@broadland.gov.uk



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APPENDIX 3
DRAFT STATEMENT OF COMMON GROUND

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

Between

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

And

Site Reference:

Site Address:

Proposed Development:

Introduction

The Greater Norwich authorities want to ensure sites allocated in the GNLP are achievable, where possible wholly compliant with all relevant planning considerations, and deliverable in a timely way. It is with that purpose in mind that landowners, agents and developers with a site likely to be included in the GNLP are being asked to agree a Site Allocation Statement of Common Ground (SoCG). Each SoCG will be available to the inspector appointed to examine the GNLP so that they can satisfy themselves of the commitment to deliver each site and to meeting local plan requirements.

The GNLP Team wants the process of agreeing a SoCG to be a frank but collaborative process for all parties concerned. In the case of most sites, this process is likely to commence in Autumn 2020 and conclude in 2021 as the Regulation 19 submission draft of the GNLP is finalised. For other sites, for example where development may entail abnormal costs, discussions may continue in to 2022, as the GNLP reaches its examination in public.

This SoCG template has been designed with consideration to the possibility of future planning reforms. It is deliberately straightforward and only asks the questions that any landowner, agent, or developer would naturally ask themselves. The template only requires 700 words of written response to complete, but its importance should not be underestimated.

The GNLP Team regards the viability and timely delivery of development as a high priority. Therefore, the working assumption is without a SoCG a site is unlikely to be allocated.

General Guidance

When completing the SoCG template please be precise. For example, in the description of development proposed, use the appropriate GNLP four-digit reference code, as well as giving a site address (including a postcode or eastings/northings reference).

Signatories to the SoCG should include all relevant parties with a role in bringing forward the proposed development. This should include all landowners, agents, developers, and possibly end-users of the development (if known).

Greater Norwich Local Plan (GNLP)

The SoCG template contains a series of free-text questions that are designed to be answered within 100 words. If for whatever reason answering one or more of these questions is not possible or proves difficult site promoters are welcome to seek guidance from the GNLP Team. This may lead to completing the SoCG with a description of what issues remain for resolution at a future date.

Completing this SoCG template should be done with reference to the draft policies associated to the GNLP. Notable examples that will likely affect the form of development on site and its construction costs include:

- Provision of green infrastructure and suitable alternative green space (known as SANGS) under Policy 2 Sustainable Development and Policy 3 Environmental Protection and Enhancement; and,
- Obligations for affordable housing under Policy 5 Homes.

It should also be noted that completing a SoCG is a separate exercise from other data requests made by the Greater Norwich Local Plan Team, or the Greater Norwich authorities. For example, this is a separate exercise to the Five-year Housing Land Supply statements that are requested for the Annual Monitoring Report.

Commercially Sensitive or Other Confidential Information

By submitting a SoCG you are consenting to the details about you and your site/s being published and available for public viewing. Any information that you consider to be confidential or commercially sensitive and would not want published should be excluded from this form.

By signing you are agreeing to the information provided being to the best available knowledge accurate, and that it can be used in preparation of the Greater Norwich Local Plan (GNLP) – and used in evidence at the public examination of the GNLP.

1. Please provide a commentary on the site's progress in respect to the three tests of being available, suitable, and deliverable.

[Approximately 100 words recommended]

2. Please provide a commentary on any land ownership constraints that may affect or delay development of the site.

[Approximately 100 words recommended]

3. Please provide a commentary on progress to making a planning application – such as pre-application advice, or if planning permission exists on all or part of the site.

[Approximately 100 words recommended]

4. Please provide a commentary on the site's delivery, for example a predicted start-on-site, the annual rate of delivery, and the development's likely completion date.

[Approximately 100 words recommended]

5. Please provide a commentary on engagement held with statutory bodies and if any agreements have been made.

[Approximately 100 words recommended]

6. Please provide a commentary on any known technical constraints about the site – such as but not limited to highways, heritage, or ecology.

[Approximately 100 words recommended]

7. Please provide a commentary on community benefits the site will offer – such as but not limited to land and/or buildings for education and community provision.

[Approximately 100 words recommended]

Greater Norwich Local Plan (GNLP)

Signed on Behalf of the Greater Norwich Development Partnership	Date
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Signed on behalf of	Date
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NORWICH
City Council



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