

# **GREATER NORWICH LOCAL PLAN 2036 NEW, REVISED AND SMALL SITES (REGULATION 18 STAGE B) CONSULTATION**

## **REPRESENTATIONS ON BEHALF OF AMBER REI HOLDINGS LTD.**

### **SOUTH SITE BERNARD MATTHEWS GREAT WITCHINGHAM**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

**Prepared by:** Luke Thorpe

## **Pegasus Group**

5 The Priory | Old London Road | Canwell | Sutton Coldfield | B75 5SH

**T** 0121 308 9570 | **F** 0121 323 2215 | **W** [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester  
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## 1. INTRODUCTION

- 1.1 On behalf of Amber REI Holdings, we are pleased to submit these representations to the Greater Norwich Local Plan (GNLP) 2036 Stage B (New, Revised and Small Sites) Regulation 18 Consultation.
- 1.2 The purpose of the GNLP is to manage, direct and deliver housing and economic growth by setting out detailed proposals and targets for the Greater Norwich Development Partnership (GNDP). The GNDP involves Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council working together to produce and deliver the GNLP framework. The GNLP 2036 is being produced to replace / update the Joint Core Strategy (JCS) 2014 and Site Allocations Documents adopted prior to 2016.
- 1.3 These representations relate to land at Bernard Matthews South Site, Great Witchingham, which is situated in the Broadland District Council area. The site is owned by Amber REI Holdings Ltd.
- 1.4 The site is identified as 'GNLP2184' in the Housing and Employment Land Availability Assessment (HELAA) Addendum October 2018. We consider the site to be sustainable, suitable, available and deliverable for residential development. The suitability assessment carried out by the GNDP is considered to inappropriately discount the site as unsuitable, with the constraints and impact analyses being erroneously assessed.
- 1.5 Stage A of the Regulation 18 consultation (January to March 2018) consulted on 562 Site Proposals and Growth Options. This stage (B) consultation is consult on 200 Site Proposals. The Bernard Matthews South Site Submission (Appendix 1) was submitted in August 2018 and has been assessed by the Council's for its suitability within the HELAA Addendum 2018.

### Bernard Matthews Poultry Processing Factory

- 1.6 The Poultry Processing Factory occupies two sites either side of Hall Road (north and south sites). The north site is in operational use and occupies an approximate built area of 9ha, which is comprised of large shed buildings, lorry and car parking surrounded by dense woodland and agricultural fields beyond. The south site occupies approximately 4.7ha, it is comprised of disused office, poultry processing and water treatment facilities. To the west and south is dense woodland screening with hedgerows to the south east and east of the site. The two sites together

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employed approximately 675 full-time employees with additional part-time seasonal workers.

- 1.7 The site is surrounded by agricultural land to the north, east and south, with the Grade II Listed Great Witchingham Hall to the west and the River Wensum Special Area of Conservation to the south and south west. Lenwade is situated to the south west, with a substantial employment area to the south. Within the open countryside (north, east and west) there are several farmsteads and hamlets.

## 2. PLANNING POLICY BACKGROUND

- 2.1 The amended Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in January 2014. It forms the main policy document for the Greater Norwich area and makes up the strategic vision for individual district's Local Plans. Specific to Broadland District Council, the JCS provides the framework for the Development Management Development Plan Document (DPD) adopted August 2015 and the Site Allocations DPD adopted May 2016.

### Spatial Vision and Objectives on Brownfield Land

- 2.2 Regarding climate change and sustainability, the Spatial Vision on page 20 of the JCS 2014 encourages "*maximising the use of brownfield land*". Objective 4 on page 24 seeks to promote regeneration and reduce deprivation, it states:

*"Growth will be used to bring benefits to local people, especially those in deprived communities, to regenerate communities, local economies, under-used brownfield land and neighbourhoods by creating safe, healthy, prosperous, sustainable and inclusive communities."*

- 2.3 In the explanatory text (paragraph 5.3) of Policy 1 'Addressing climate change and protecting environmental assets', the Council pays regard to Brownfield land:

*"While subsequent policies in this strategy maximise the level of development on brownfield land the opportunities for new allocations are limited. Only a very limited proportion of new employment allocations and fewer than 20% of new housing allocations are likely to be on brownfield land. When added to existing commitments the proportion of total housing development on brownfield land is likely to be between 25% and 30%."*

- 2.4 In the instance of the Bernard Matthews South Site, there is an opportunity to allocate brownfield land and increase the number of houses to be delivered on such land. This offers the potential to improve the physical quality and visual attractiveness of the site, while utilising vacant land. Therefore, there is a strong the case to improve the sustainability of the site through efficient and necessary redevelopment; that will be effectively managed by relevant JCS and Development Management policies and other material considerations.

### Other Relevant Policies

- 2.5 Policy 9 of the JCS outlines the 'Strategy for growth in the Norwich Policy Area'. It identifies the settlement hierarchy that makes up the Greater Norwich Area (GNA). It seeks to distribute growth appropriately and sustainably throughout the plan area. It states that housing need will be addressed through new allocations for a minimum of 21,000 dwellings, 2,000 dwellings of which are for smaller sites in Broadland that fall into the Norwich Policy Area (NPA). However, as shown on a settlement hierarchy map (pg. 80) Lenwade (and Great Witchingham) fall outside of the NPA and are within the Broadland Rural Area.
- 2.6 Policy 9 suggests that smaller sites in Broadland will be allocated in accordance with the settlement hierarchy, local environmental and servicing considerations. The policy then goes on to specify that the figure for 2,000 dwellings is '*the minimum number to be delivered*' in Broadland. However, Policy 9 does not provide figures for areas outside of the NPA and it does not explicitly state that proposals for housing should be restricted.

### **The National Planning Policy Framework**

- 2.7 The National Planning Policy Framework (NPPF) 2018 sets out the Governments planning policies for England and how they should be applied in Local Plan preparation and decision-making. The NPPF constitutes a material consideration.

#### Plan-making

- 2.8 NPPF paragraph 23 states:

*"[...] Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or nonstrategic policies)."*

#### Delivering a sufficient supply of homes

- 2.9 Paragraph 60 states:

*"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment [...] unless exceptional circumstances*

*justify an alternative approach which also reflects current and future demographic trends and market signals. [...].”*

2.10 Paragraph 65 states that:

*“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.”*

2.11 Paragraph 67 states:

*“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*

- a) specific, deliverable sites for years one to five of the plan period; and*
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*

2.12 Paragraph 70 states:

*“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. [...].”*

2.13 Paragraph 75 requires the LPA to:

*“[...] maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years.”*

Making effective use of land

2.14 Paragraph 117 states:

*"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land."*

2.15 Paragraph 118 states that planning policies and decisions should:

- a) *"encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;*
- b) *recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;*
- c) *give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*
- d) *promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure; and*
- e) *support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards) and can maintain safe access and egress for occupiers."*

2.16 Furthermore, paragraph 119 states:



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*"Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers [...] using the full range of powers available to them. [...]."*

- 2.17 The NPPF identifies the importance of delivering a sufficient supply of homes, particularly ensuring a minimum number is provided for the whole plan period. The NPPF also highlights the importance of taking a positive approach to ensure brownfield / previously developed land is promoted and brought forward to meet existing needs. It outlines the necessary steps to ensure such sites contribute appropriately to the surrounding context to enhancement environmental, social and economic conditions.

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### **3. THE BERNARD MATTHEWS SOUTH SITE, LENWADE (GREAT WITCHINGHAM)**

3.1 The following section discusses the suitability, availability and deliverability of the scheme to demonstrate that the site is an appropriate allocation in accordance with NPPF 2018 paragraphs 67 and 72.

#### Sustainable

3.2 It is considered that the Bernard Matthews South Site meets the NPPF 2018 sustainability objectives as set out in paragraphs 7-14. As is discussed below the site presents opportunities to enhance and connect biodiversity through the site, in a lower impact form of development than that which currently exists. The site is in appropriate proximity of Lenwade which can encourage walking and cycling to and from the site. There are also numerous employment areas and local services in nearby settlements and towards Norwich, as well as the immediately opposing north site. The redevelopment of the site has the potential to support existing businesses within Lenwade and other surrounding rural settlements. As a large vacant brownfield factory site, its redevelopment for housing or for mixed use development is considered to be an efficient and sustainable use of the land.

#### Deliverable

3.3 The site is owned by Amber REI and is available for development immediately subject to the planning process. The freeholder supports the site's redevelopment as the existing use was no longer considered to be viable. As such, there it is realistic expectation that the site can come forward for development in the coming 5 years, to be completed within 2 years of development commencing.

#### Suitability

3.4 The following section contains an assessment of relevant technical matters in respect of the South Site at the Bernard Matthews Poultry Processing Plant, Great Witchingham. It includes references to the Suitability Assessment prepared by the GNDP and supporting documentation, including supporting documents from a recent planning application on the site (application reference 20101925) that was granted planning permission for the 'erection of New Slaughter Facility, Lairage Unit, Gate House, Dry Good Store Canopy, Water Storage Facility and One Off New Effluent Filtration Beds'.

3.5 The Council's site Suitability Assessment concludes that the site is unsuitable, key points in the conclusion are:

- The land is a derelict industrial site;
- Highways improvements could be required but the existing use has led to the local road access being used to support HGV movements;
- The site is beyond the built edge of Lenwade and there is limited footpath access along Hall Road;
- There is a potential impact on the setting of the Grade II Listed Great Witchingham Hall to the west;
- 200m south is the River Wensum Special Area of Conservation, nearby are Sites of Specific Scientific Interest and County Wildlife Site designations;
- As Brownfield Land there are possible contamination and ground stability concerns, including surface water flood risk management;
- Limited access to core services would be difficult to mitigate.

3.6 We object to certain parts to parts of this assessment and question its credibility. We object to the Council's Constraints and Impacts Analyses that discount the site for allocation. We consider this assessment to be contrary to the national policy objectives and adopted JCS 2014 policies. Our analysis of the constraints and impacts associated with the redevelopment of the south site is set out below.

### **Constraints Analysis**

#### Access

3.7 The GNDP has assessed the site to have good (green) access into the site, we agree with this point as the site has good access in place. The site is situated along Hall Road, which connects to the Lenwade and the A1607 by road to the south west (1.2 km). There is also has vehicular access traveling east towards Aldeford and Reepham Road. The site is well-located to larger settlements towards Norwich (15km south east), Drayton (8.4km south east), Horsford (8.2km east) and Taverham (6.4km south east). Lenwade and Aldeford are within 20 minutes' walk which means local services are appropriately accessible by foot and bike.

#### Accessibility to Services

3.8 We object to assessment of the sites accessibility to services which was rated as poor (Red). The site is in close proximity (1.9km) of Lenwade and Great

Witchingham where there is a doctor's surgery, primary school, a village hall, butchers, bakers, fish and chip shop, two Public Houses, a petrol filling station and hair dressers. The redevelopment of the site will support these local services.

- 3.9 There is existing employment on the opposite site of Hall Road and south along the A1067. Particularly regarding the Bernard Matthews north site, the redevelopment of the south site can provide for specific accommodation needs of part-time / seasonal workers, as well as providing services for employees to use. Such an arrangement would further enhance the sustainability of the site.
- 3.10 The site is within walking distance of Lenwade and is a quick drive from the site, it is expected that local residents of the redeveloped site would use this as their primary service centre for their regular needs. Accessibility to these services can be improved further by establishing footpaths along Hall Road to improve accessibility in the area and encourage healthier walking and cycling.
- 3.11 The site has appropriate access to services, most importantly the redevelopment of the site will support Lenwade's existing businesses; therefore, bolstering their viability and maintenance. The Council's Suitability Assessment does not adequately consider this within the assessment, which wrongly represents the benefits of redeveloping the site. As such, it is respectfully requested that the Council amend this to green to accurately reflect the connectivity of the site to Lenwade.

#### Utilities Capacity and Utilities Infrastructure

- 3.12 The GNDP's has assessed both utilities capacity and infrastructure as good, which is agreeable considering the sites existing use.

#### Contamination and Ground Stability

- 3.13 Contamination and ground stability is identified as a potential concern, identified as amber in the Suitability Assessment. A previous planning permission (20101925) provided a 'Ground Contamination Desk Study'. It concluded that there are no significant potential sources of on-site or former contaminative uses or, existing operational apparatus that risk ground contamination. As such no significant pollutant linkage risks on the site were found. It is expected that this will be the same for the whole the site.
- 3.14 Considering the lifetime of the site and its use, land stability and contamination by hazardous materials are not expected to preclude redevelopment. The existing use

has been ongoing for over 20 years and no onsite buildings have experienced structural issues.

- 3.15 As a poultry processing plant, it is not expected that the daily operations of the facility would result in hazardous chemicals entering the soil structure beneath. However, up-to-date Land Stability and Ground Contamination Assessments can be carried out to demonstrate this in a future Planning Application, with any suggested mitigation measures followed if necessary. If the site is not supported for redevelopment any potential contamination will remain and potentially spread through the site. This puts at risk the stability and quality of nearby natural environments. With respect to this, the site should be identified as green as redevelopment presents an opportunity to improve / mitigate land stability and ground contamination issues on site.

#### Flood Risk

- 3.16 Flood risk has also been identified as being amber. It was further raised in the conclusion as a risk given to the extent of hard surfacing on the site. Regarding the previous planning application (20101925), the Flood Risk Assessment found that an attenuation system would support and contain increases in surface water runoff.
- 3.17 The same principle can be applied to residential development on the site, however the impact should be considerably lower due to the likely reduction in hard surfacing and increase in soft landscaping that would result through the sites redevelopment.
- 3.18 With regard to the Environment Agency 'Flood Map for Planning' and 'Long Term Flood Risk Map', a majority of the site has minimal surface water flood risk with small patches of medium and high risk. Flood Zone 3 is located away from the site along the River Wensum (c.340m to the south). To support redevelopment following submission of a planning application, a Flood Risk Assessment will be produced to confirm this. This will assess whether there is an increased risk of flooding caused by development, considering up-to-date environmental factors. Furthermore, evidence from the Environment Agency Flooding Maps can feed into an initial design to further improve a schemes resilience.
- 3.19 The site does not currently present a risk of flooding, however the sites redevelopment will further increase the absorption capacity of the south site. This is a significant benefit as it represents a reduction in the sites impact / influence

on the River Wensum through the increase in soft landscaping and attenuation provisions. Considering this, the site should be identified as green.

#### Market Attractiveness

- 3.20 Market attractiveness has been identified as green, we agree that it would be attractive to a range of people looking to move to and around Greater Norwich. The size of the site means there is potential capacity to meet specific needs. The attractiveness of the site for housing may improve the viability of the scheme and would result in the redevelopment being deliverable in the short to medium term.

#### Impacts Analysis

##### Significant Landscapes

- 3.21 The Council's suitability assessment identifies the impacts on significant landscapes to be amber. There is no particular mention of 'significant landscapes' in the JCS 2014, however the Landscape Character Assessment 2013 does provide further information on the landscape character of the area. It highlights areas to the south of the site as a Special Area of Conservation and a County Wildlife Site (as discussed below). Lenwade and Great Witchingham are situated with the broader Wensum River Valley Landscape Character Area. The cultural landscape of this area is between areas defined as clustered settlements, large farms and ancient woodlands, and moderately high dispersal with farms, small farms and secondary / recent woodland.
- 3.22 The Landscape Character Assessment outlines Broadland's River Valley areas key characteristics. The Bernard Matthews factory site does not reflect these characteristics due to the nature and scale of the buildings and operations that take place. However, the redevelopment of the South Site provides an opportunity for scheme design to incorporate and enhance the characteristics present in the wider area into the development; thus reflecting local and national policy surrounding the protection and enhancement of an areas biodiversity and landscape.
- 3.23 The Suitability Assessment inappropriately identifies the site as amber. However, the redevelopment of the site for housing will have an enhanced, softer and more integrated appearance as opposed to the existing buildings on the site. Therefore, the sites redevelopment will have a positive impact on biodiversity and the wider landscape. This should be recognised by identifying the site as green in the GNPD Suitability Assessment.

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### Townscapes

- 3.24 With regard to impact on townscapes, the suitability assessment also identified the impact as amber, without proper justification. The Bernard Matthews factory site has greater adverse impact on Lenwade's townscape. In comparison, a well-designed proposal for housing / mixed use development will result in integrated scheme that would better reflect Lenwade's character.
- 3.25 There is a sufficient and substantial natural buffer between the site and Lenwade and Great Witchingham. This buffer ensures the site is well screened from the settlement and will further reduce the visual impact on the setting of the settlement, which takes a linear form along a main road. The topography of the site gently slopes south towards the river and special area of conservation. The south site sits at approximately +20m above sea level, which is the same level as the highest portion of Lenwade to the west. Considering the substantial natural screening present, viewpoints to and from the site and Lenwade are limited. Screening can be incorporated into the redevelopment of the site to add an additional buffer to remove any visual relationship shared between the site and Lenwade.
- 3.26 The impact from the redevelopment of the site on the townscape and built form of Lenwade will be negligible. Considering the existing appearance and use of the site, there are significant opportunities to enhance the area to further improve the contribution the site can make to the immediate area. Accordingly, we consider the impact surrounding townscape to be positive and the GNDP Suitability Assessment should reflect this by identifying the site as green.

### Biodiversity and Geodiversity

- 3.27 The site sits approximately 1km away from Aldeford Common SSSI and the River Wensum Special Area of Conservation is located c. 200-300m south. The immediate area surrounding the river is a county wildlife site.
- 3.28 The Suitability Assessment identifies the site as amber in this respect. However, it is considered that the redevelopment of the site presents an opportunity to achieve net gains in biodiversity and improve a large portion of the sites geology. This will be achieved by restoring a significant portion of the site for residential gardens, public realm landscaping, tree planting, boundary screening and SuDS; the inclusion of which will improve the permeability and attractiveness of the site for wildlife. The redevelopment of the site presents an opportunity to enhance the

natural quality within and around the site, as such it should be identified a green in the Suitability Assessment.

#### Historic Environment

- 3.29 The Grade II\* listed Witchingham Hall sits approximately 450m to the west of the site, which is currently used as offices associated with use of existing site. Within its substantial grounds there is a Grade II listed kitchen garden wall with gazebos. There is also the Tumulus in the Warren Scheduled Ancient Monument c.690m south, however there is limited information available on the site.
- 3.30 The Suitability Assessment identifies the impact from the redevelopment of the site as amber. The conclusion states that "*as to townscape considerations, an impact could be upon the setting of the Grade II Great Witchingham Hall to the west*". However, the removal of the harmful factory and replacement with housing will be more beneficial for the historic environment; particularly considering the existing context of the site, which has substantially impacted the setting of the Great Witchingham Hall.
- 3.31 The site is located a considerable distance from the Grade II Listed Hall with already substantial screening between. However, the redevelopment of the site will replace an unattractive factory site with housing with associated landscaping to improve the south sites integration with the surrounding historic / natural environment. In addition, the design of the scheme can be more sensitive by reflecting the characteristics of the Grade II Listed Hall. The Suitability Assessment should identify Historic Environment impacts as being green.

#### Open Space and GI

- 3.32 We agree with the Council's comments that the site will have positive impacts on Open Space and Green Infrastructure in the area. However, this should be equally reflected in the Biodiversity and Geodiversity section above, as to a certain extent they are interconnected. There are further opportunities to provide GI connections and open space areas for residents, while enhancing biodiversity in the surrounding natural areas. Footpath connections can be provided to Lenwade and redevelopment will result in additional open space provisions.

#### Transport and Roads

- 3.33 We disagree with the Council's assessment to not reflect transport and road network connections positively. Road access to the site is good and is well accessed



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by road to nearby towns and villages and, Norwich. The site has good connections to the main route to Norwich and Taverham by car and bus routes can be further improved or established. At current there are two bus stops within 30 minutes' walk of the site which is acceptable, however, this can be improved by establishing more direct footpaths or bus stops closer to the site.

- 3.34 The immediate road networks capacity and quality is good considering it accommodates regular currently experiences regular HGV use. Transportation factors will change but this is not expected to preclude development taking place or create adverse impacts on the existing highways network.

Compatibility with Neighbouring Uses

- 3.35 We agree with the Council's assessment of the sites compatibility with neighbouring uses. The site once redeveloped will have appropriate and sensitive separation that protects the amenity of all uses in the immediate area. Any particular issues can be identified and mitigated in the design, consultation and decision stages of the planning process.

#### 4. CONCLUSION

- 4.1 Within the Council's Constraints and Impacts Analyses there are several topics that have been incorrectly and unjustifiably assessed. The above assessment identifies these topics and provides justification for why they should be considered more positively than the Council's current assessment.
- 4.2 Sufficient information is available in a recent planning permission (20101925) on contamination, ground stability and flood risk. Within this application the council did not request further assessments. Otherwise, there are significant benefits that would result from the redevelopment of the site that have not been recognised by in the Suitability Assessment (which is concerning considering the existing brownfield nature of the site); such opportunities include access to services, landscape, townscape, biodiversity and heritage benefits. It is respectfully requested that these factors are reconsidered to confirm that the redevelopment of a brownfield site is appropriate, attractive and sustainable.
- 4.3 The brownfield nature of the site is a particularly poignant consideration. It is concerning that the Suitability Assessment does not pay any regard to the opportunity to redevelop and clean up the significant area of brownfield land. The National Planning Policy Framework is clear in its desire to realise and utilise previously developed land.
- 4.4 The Bernard Matthews South Site presents a good opportunity to redevelop a substantial brownfield site to improve the site's environmental quality and its integration with the surrounding countryside and heritage assets. The redevelopment of the site will support local services and provide net gains for biodiversity. It will also result in the redevelopment of a substantial vacant factory site that has a poor visual appearance and poor integration with the surrounding area. Not supporting the redevelopment risks continued adverse impacts on the area's character, appearance and environmental quality.
- 4.5 The Council should take a more positive and proactive approach to secure the benefits associated with the redevelopment of the site, by supporting the utilisation of a brownfield site to benefit the local environment, economy and people; while further enhancing their own housing land supply.

## **APPENDIX 1**

### **CALL FOR SITES SUBMISSION FORM**

## Greater Norwich Site Submission Form

|                       |  |
|-----------------------|--|
| FOR OFFICIAL USE ONLY |  |
| Response Number:      |  |
| Date Received:        |  |

This form is to be filled out by any interested parties who want to promote a site for a specific use or development to be allocated in the Greater Norwich Local Plan.

Only one form should be submitted for each individual site i.e. it is not necessary for a separate form to be completed for each landowner on a single site in multiple ownerships. However, a separate form must be completed for each individual site submitted.

Your completed form should be returned to the Greater Norwich Local Plan team no later than **5pm on Thursday 22 March 2018.**

By email: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Or, if it is not possible submit the form electronically,

By Post to:

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

The site submissions received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be published and made available for public viewing. By submitting this form you are consenting to the details about you and your individual site(s) being stored by Norfolk County Council and shared with Broadland District Council, Norwich City Council and South Norfolk District Council, and that the details of the site will be published for consultation purposes.

Further advice and guidance can be obtained by visiting the Greater Norwich Local Plan website or by contacting the Greater Norwich Local Plan team directly:

Website: [www.gnlp.org.uk](http://www.gnlp.org.uk)  
E-mail: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)  
Telephone: 01603 306603

| <b>1a. Contact Details</b>    |   |
|-------------------------------|---|
| Title                         |   |
| First Name                    | Adrian  |
| Last Name                     | Moore   |
| Job Title (where relevant)    | Planner   |
| Organisation (where relevant) | Pegasus Group                                   |
| Address                       | Colmore Place<br>39 Bennetts Hill<br>Birmingham |
| Post Code                     | B2 5SN  |
| Telephone Number              | 0121 308 9570                                   |
| Email Address                 | adrian.moore@pegasusgroup.co.uk                 |

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

| <b>1c. Client/Landowner Details</b> (if different from question 1a) |  |
|---|--|
| Title   |  |
| First Name  |  |
| Last Name   |  |
| Job Title (where relevant)  |  |
| Organisation (where relevant)                                       | Amber Real Estate Investments (Industrial) Limited                 |
| Address   | 2 <sup>nd</sup> Floor Colmore Court<br>9 Colmore Row<br>Birmingham |
| Post Code   | B3 2BJ   |
| Telephone Number  |  |
| Email Address   |  |

| <b>2. Site Details</b>  |   |
|---|---|
| Site location / address and post code<br><br>(please include as an attachment to this response form a location plan of the site on an scaled OS base with the boundaries of the site clearly shown) | Bernard Matthews South Site<br>Hall Road<br>Great Witchingham<br>Norfolk<br>NR9 5QD |
| Grid reference (if known)   | 611611 318629   |
| Site area (hectares)  | 5.1   |

|  |                                 |   |
|--|---------------------------------|---|
| <b>Site Ownership</b>  |                                 |   |
| <b>3a. I (or my client)...</b>   |                                 |   |
| Is the sole owner of the site  | Is a part owner of the site     | Do/Does not own (or hold any legal interest in) the site whatsoever |
| <input checked="" type="checkbox"/>  | <input type="checkbox"/>        | <input type="checkbox"/>  |
| <b>3b. Please provide the name, address and contact details of the site's landowner(s) and attach copies of all relevant title plans and deeds (if available).</b> |                                 |   |
|  |                                 |   |
| <b>3c. If the site is in multiple landownerships do all landowners support your proposal for the site?</b>   | Yes<br><input type="checkbox"/> | No<br><input type="checkbox"/>                                      |
| <b>3d. If you answered no to the above question please provide details of why not all of the sites owners support your proposals for the site.</b>                 |                                 |   |
|  |                                 |   |

|  |  |                                |
|--|--|--------------------------------|
| <b>Current and Historic Land Uses</b>  |  |                                |
| <b>4a. Current Land Use</b> (Please describe the site's current land use e.g. agriculture, employment, unused/vacant etc.)   |  |                                |
| The site is a vacant brownfield site formerly in use for the lairage, slaughter, cutting packing and despatch of poultry, the storage of water and dry goods and the filtration of effluent. |  |                                |
| <b>4b. Has the site been previously developed?</b>   | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/> |

**4c. Describe any previous uses of the site.** (please provide details of any relevant historic planning applications, including application numbers if known)

The development of facilities for the lairage and slaughter of poultry, the storage of water and dry goods and the filtration of effluent was approved in 2011 under a planning application with reference 20101925.

There is no other planning history for the site available online but we understand that the facilities approved in 2011 replaced and upgraded poultry slaughter facilities on the same site and the leaseholder had operated on the site since 1955.

**Proposed Future Uses**

**5a. Please provide a short description of the development or land use you proposed** (if you are proposing a site to be designated as local green space please go directly to question 6)

The site is proposed for residential redevelopment.

**5b. Which of the following use or uses are you proposing?**

|  |   |   |
|--|---|---|
| Market Housing <input checked="" type="checkbox"/>   | Business and offices <input type="checkbox"/>   | Recreation & Leisure <input type="checkbox"/> |
| Affordable Housing <input type="checkbox"/>          | General industrial <input type="checkbox"/>     | Community Use <input type="checkbox"/>        |
| Residential Care Home <input type="checkbox"/>       | Storage & distribution <input type="checkbox"/> | Public Open Space <input type="checkbox"/>    |
| Gypsy and Traveller Pitches <input type="checkbox"/> | Tourism <input type="checkbox"/>                | Other (Please Specify)                        |

**5c. Please provide further details of your proposal, including details on number of houses and proposed floorspace of commercial buildings etc.**

A detailed design for the site has not yet been drawn up. Up to approximately 150 houses and appropriate landscaping and outdoor space are proposed.

**5d. Please describe any benefits to the Local Area that the development of the site could provide.**

The proposed development would bring a large derelict site back into beneficial use. The proposals would improve the relationship of the site to the surrounding landscape and the nearby Grade-II listed building, reduce HGV traffic on the surrounding roads, contribute towards meeting local housing needs, provide construction jobs during the development process and provide support to the local economy and the facilities within Great Witchingham through the introduction of new residents to the area.



**Local Green Space**

If you are proposed a site to be designated as Local Green Space please complete the following questions. These questions do not need to be completed if you are not proposing a site as Local Green Space. Please consult the guidance notes for an explanation of Local Green Space Designations.

**6a. Which community would the site serve and how would the designation of the site benefit that community.**

N/A

**6b. Please describe why you consider the site to be of particular local significance e.g. recreational value, tranquillity or richness in wildlife.**

N/A

**Site Features and Constraints**

Are there any features of the site or limitations that may constrain development on this site (please give details)?

**7a. Site Access:** Is there a current means of access to the site from the public highway, does this access need to be improved before development can take place and are there any public rights of way that cross or adjoin the site?

Development can proceed using the existing access directly from Hall Road.

**7b. Topography:** Are there any slopes or significant changes of in levels that could affect the development of the site?

The site is relatively level and uniform.

**7c. Ground Conditions:** Are ground conditions on the site stable? Are there potential ground contamination issues?

No known issues. Drainage in the site's previous use went directly to the on-site effluent plant before discharge to the watercourse and was governed by strict licensing and controls. The ground conditions would be subject to full site investigation prior to redevelopment.

**7d. Flood Risk:** Is the site liable to river, ground water or surface water flooding and if so what is the nature, source and frequency of the flooding?

No known issues. The site is in Flood Zone 1.

**7e. Legal Issues:** Is there land in third party ownership, or access rights, which must be acquired to develop the site, do any restrictive covenants exist, are there any existing tenancies?

The site is leased to Bernard Matthews Foods Limited ("BMFL"). BMFL supports the proposals for redevelopment.

**7f. Environmental Issues:** Is the site located next to a watercourse or mature woodland, are there any significant trees or hedgerows crossing or bordering the site are there any known features of ecological or geological importance on or adjacent to the site?

The site is around 300m north of the River Wensum and its associated Special Area of Conservation. There is extensive planting around the western, southern and eastern boundaries and within the southern portion of the site.

**7g. Heritage Issues:** Are there any listed buildings, Conservation Areas, Historic Parklands or Schedules Monuments on the site or nearby? If so, how might the site's development affect them?

The Grade II-listed Great Witchingham Hall lies around 300m west of the site. The site is well screened from Great Witchingham Hall by substantial planting. Redevelopment will reduce HGV movements from the site past Great Witchingham Hall. Landscaping and impacts on the listed building will be considered as part of any redevelopment proposal.

**7h. Neighbouring Uses:** What are the neighbouring uses and will either the proposed use or neighbouring uses have any implications?

Great Witchingham Hall and its grounds lie west of the site, separated from the site by substantial planting. To the south, more substantial planting separates the site from the River Wensum Special Area of Conservation. The land to the east is in agricultural use. Across Hall Road to the north is an operational Bernard Matthews Great Witchingham North processing site. The operations at the North Site are not expected to cause any issues in relation to the proposed redevelopment at the South Site.

**7i. Existing uses and Buildings:** are there any existing buildings or uses that need to be relocated before the site can be developed.

Existing buildings associated with the site's former use will need to be demolished and removed before redevelopment commences.

**7j. Other:** (please specify):

| <b>Utilities</b>  |                                     |                                     |                          |
|---|-------------------------------------|-------------------------------------|--------------------------|
| <b>8a. Which of the following are likely to be readily available to service the site and enable its development? Please provide details where possible.</b> |                                     |                                     |                          |
|   | Yes                                 | No                                  | Unsure                   |
| Mains water supply  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| Mains sewerage  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Electricity supply  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| Gas supply  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Public highway  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| Broadband internet  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| Other (please specify):   |                                     |                                     |                          |
| <b>8b. Please provide any further information on the utilities available on the site:</b>   |                                     |                                     |                          |
|   |                                     |                                     |                          |

| <b>Availability</b>  |                                     |
|--|-------------------------------------|
| <b>9a. Please indicate when the site could be made available for the land use or development proposed.</b> |                                     |
| Immediately  | <input checked="" type="checkbox"/> |
| 1 to 5 years (by April 2021)   | <input type="checkbox"/>            |
| 5 - 10 years (between April 2021 and 2026)   | <input type="checkbox"/>            |
| 10 – 15 years (between April 2026 and 2031)  | <input type="checkbox"/>            |
| 15 - 20 years (between April 2031 and 2036)  | <input type="checkbox"/>            |
| <b>9b. Please give reasons for the answer given above.</b>   |                                     |
|  |                                     |

The site is in single freehold ownership of a property company with development capabilities. The single leaseholder supports the site's redevelopment as the existing use is no longer viable.

**Market Interest**

**10. Please choose the most appropriate category below to indicate what level of market interest there is/has been in the site. Please include relevant dates in the comments section.**

|  | Yes                                 | Comments |
|--|-------------------------------------|----------|
| Site is owned by a developer/promoter        | <input checked="" type="checkbox"/> |          |
| Site is under option to a developer/promoter | <input type="checkbox"/>            |          |
| Enquiries received                           | <input type="checkbox"/>            |          |
| Site is being marketed                       | <input type="checkbox"/>            |          |
| None   | <input type="checkbox"/>            |          |
| Not known                                    | <input type="checkbox"/>            |          |

**Delivery**

**11a. Please indicate when you anticipate the proposed development could be begun.**

|   |                                     |
|---|-------------------------------------|
| Up to 5 years (by April 2021)               | <input checked="" type="checkbox"/> |
| 5 - 10 years (between April 2021 and 2026)  | <input type="checkbox"/>            |
| 10 – 15 years (between April 2026 and 2031) | <input type="checkbox"/>            |
| 15 - 20 years (between April 2031 and 2036) | <input type="checkbox"/>            |

**11b. Once started, how many years do you think it would take to complete the proposed development (if known)?**

Approximately two years.

|  |                                     |                          |                                     |
|--|-------------------------------------|--------------------------|-------------------------------------|
| <b>Viability</b>   |                                     |                          |                                     |
| <b>12a. You acknowledge that there are likely to be policy requirements and Community Infrastructure Levy (CIL) costs to be met which will be in addition to the other development costs of the site (depending on the type and scale of land use proposed). These requirements are likely to include but are not limited to: Affordable Housing; Sports Pitches &amp; Children's Play Space and Community Infrastructure Levy</b> |                                     |                          | <input checked="" type="checkbox"/> |
|  | Yes                                 | No                       | Unsure                              |
| <b>12b. Do you know if there are there any abnormal costs that could affect the viability of the site e.g. infrastructure, demolition or ground conditions?</b>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| <b>12c. If there are abnormal costs associated with the site please provide details:</b>   |                                     |                          |                                     |
| Demolition of existing buildings and structures and levelling will be required   |                                     |                          |                                     |
| <b>12d. Do you consider that the site is currently viable for its proposed use taking into account any and all current planning policy and CIL considerations and other abnormal development costs associated with the site?</b>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/>            |
| <b>12e. Please attach any viability assessment or development appraisal you have undertaken for the site, or any other evidence you consider helps demonstrate the viability of the site.</b>  |                                     |                          |                                     |
|  |                                     |                          |                                     |

**Other Relevant Information**

**13. Please use the space below to for additional information or further explanations on any of the topics covered in this form**

| <b>Check List</b>  |  |
|--|--|
| Your Details   |  |
| Site Details (including site location plan)  |  |
| Site Ownership   |  |
| Current and Historic Land Uses   |  |
| Proposed Future Uses   |  |
| Local Green Space (Only to be completed for proposed Local Green Space Designations) |  |
| Site Features and Constraints  |  |
| Utilities  |  |
| Availability   |  |
| Market Interest  |  |
| Delivery   |  |
| Viability  |  |
| Other Relevant Information   |  |
| Declaration  |  |

**14. Declaration**

I understand that:

**Data Protection and Freedom of Information**

The Data Controller of this information under the 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 District 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
- to evaluate the development potential of the submitted site for the uses proposed within the form

**Disclaimer**

The Site Submission response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be published and made available for public viewing. By submitting this form you are consenting to the details about you and your individual sites being stored by Norfolk County Council, and the details being published for consultation purposes. Any information you consider to be confidential is clearly marked in the submitted response form and you have confirmed with the Council(s) in advance that such information can be kept confidential as instructed in the Greater Norwich Local Plan: Regulation 18 "Growth Options" Consultation - Site Submission Guidance Notes.

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

Name  
Adrian Moore

Date  
28 August 2018

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**APPENDIX 2**  
**SITE LOCATION PLAN**



