

## **GNLP – REGULATION 18(C) CONSULTATION RESPONSE POLICY HEL1 – HELLESDON HOSPITAL**

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On behalf of Norfolk and Suffolk NHS Foundation Trust (the Trust), we strongly support the allocation of Hellesdon Hospital under Policy HEL1 for residential and employment uses. The site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2038.

The site is allocated in the adopted Development Plan and, in the main, the draft allocation replicates the existing. More specifically, the site is identified as being capable of accommodating approximately 300 homes and employment uses. The draft Policy identifies a number of site specific matters relating to, amongst other things, vehicular and pedestrian access, and heritage assets.

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 housing being delivered on the site, and is viable. This is considered in further detail below.

### **Assessment of Delivery**

#### ***Suitable***

Hellesdon is identified in both the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) (2011) and the draft GNLP, as being part of the Norwich Fringe. Norwich and the Norwich Fringe are identified as the location to accommodate 69% 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. Norwich is the catalyst for economic growth in the area and provides a range of amenities, services and infrastructure to support sustainable housing. Within the Norwich Fringe, 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 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***

The preferred allocation 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.

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 to make efficient use of land (subject to site specific constraints).

An Indicative Masterplan prepared by LSI and submitted in support of this representation 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.

The Indicative Masterplan demonstrates how, as a minimum 300 units can be provided on the site, but that the potential exists 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 B1 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 may not be possible to provide access from Hospital Lane.

More specifically, it has become evident that access from Hospital Lane would be 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.

On this basis and in order to ensure that the site is deliverable within the plan period, the policy should provide a degree of flexibility by stating that access can be taken via either Drayton High Road or Hospital Lane. It is acknowledged that any application would need to provide technical information to demonstrate that a suitable solution in terms of highway access, which may involve more than one access point, could be provided to the site from Drayton High Road .

It should be noted that the retention of The Weavers building is shown on the Illustrative Masterplan submitted as part of this representation. Accordingly, the retention of the building will not prejudice the ability of the site to deliver the quantum of development envisaged by the policy.

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.

### *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.

### ***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.

The following Housing Trajectory relating to the site assumes that development will, at the latest, commence on the site in 2022, when the draft GNLP is adopted. It may be that development commences in advance of this date.

The Housing Trajectory has been based on the minimum development of 300 units that is envisaged by the policy.

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Units</b>	50	50	50	50	50	50	0	0	0	0	0	0	0	0	0
<b>Cumulative Total</b>	50	100	150	200	250	300	0	0	0	0	0	0	0	0	0

**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 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. This statement is, however, made in the context of the questions that have been raised in relation to the ongoing preparation of the Greater Norwich Local Plan and the review of CIL. Further discussions are required with the GNLP Team on these matters in order to confirm that the various policy objectives, such as affordable housing and community infrastructure, can be delivered on site without prejudicing the viability of the site.

**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 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.

In terms of the three strands of sustainable development, economically, the site represents the right land in the right place at the right time. Residential development will help support the planned long-term economic growth of the Greater Norwich Area, whilst funds from the disposal of the site will be reinvested in the provision of modern healthcare facilities.

Socially, the scale of development envisaged is such that it will enable the creation of a strong, vibrant and healthy community, with easy access to existing and planned local services and facilities. A wide mix of dwelling types, sizes and tenures will be provided to meet local needs, and CIL payments will ensure the provision of the necessary health and cultural facilities.

Environmentally, the site is located close to a wide range of employment opportunities, and enjoys excellent access to a range of sustainable transport options providing easy access to the extensive array of facilities and services available within Norwich city centre. Residents will be able to meet their day-to-day needs easily and without the need to use their car, assisting in reducing pollution and minimising the contribution to climate change.

Notwithstanding the foregoing, a few minor alterations are proposed to Policy HEL1

## Revised Policy Wording

**POLICY HEL1 Land at Hospital Grounds, southwest of Drayton Road, Hellesdon (approx. 14.7 ha) is allocated for residential and employment uses. The site will accommodate approximately at least 300 homes, and B1 employment uses.**

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:

- A small amount of B1 employment **generating** uses will, **subject to proven demand**, be considered appropriate ~~e.g. converting existing buildings.~~
- Vehicular access via Drayton High Road ~~and~~ **or** Hospital Lane.
- 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.**
- 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.
- 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.
- Norfolk Mineral and Waste Core Strategy Policy CS16 applies as this site is underlain by safeguarded mineral resources.

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**Red Text** = Replacement Text