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Hearing Statement: Matter 3 (Part A & C)

Hethersett Land Ltd [8570]

Agent ref: [390]

Hearing Statement

Greater Norwich Joint Core Strategy
Development Plan Document
Matter 3 (Part A and C)

BIDWELLS



Quality Assurance

Site name: Land at Hethersett, South Norfolk (SS39600009)

Client name: Hethersett Land Ltd

Type of report: Hearing Statement, Matter 3 (Part A and C)

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Date: 7th October, 2010

Prepared by: John Long BA (Hons) Dip TP MRTPI

Signed

Date 7th October, 2010

Reviewed by: Paul Clarke Dip EP, MRTPI

Signed

Date 7th October, 2010

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1 INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Bidwells on behalf of Hethersett Land Ltd. It relates to:
- Representations submitted by Bidwells, on behalf of Hethersett Land Ltd to the pre-submission version of the Greater Norwich Joint Core Strategy and the Statement of Focussed Changes in respect of **Policy 4 (Housing Delivery)**, **Policy 9 (Strategy for growth in the NPA)**, **Policy 10 (Locations for major new or expanded communities in the NPA)**, and **Policy 14 (Key Service Centres)** (Respondent ID: **8570**); and
 - A **Statement of Common Ground** agreed between the GNDP and Hethersett Land Ltd covering Matters 2 and 3.
- 1.2 This Hearing Statement is intended to amplify the representations made by Bidwells at the pre-submission stage of the Joint Core Strategy's production and update those comments in light of the suggested Focussed Changes and publication of new evidence, including the Drivas Jonas Deloitte Affordable Housing Viability Study (July 2010).
- 1.3 Since the issues raised in the representations are relevant to Matters 2, 3, 4 and 10, this statement (for Matter 3) should be read in conjunction with the accompanying statements for Matter 2, 4 and 10 and the agreed Statement of Common Ground between GNDP and Hethersett Land Ltd (Covering Matters 2 and 3).
- 1.4 This Hearing Statement is concerned with the 'matters still in dispute', relevant to Matter 3: Housing Delivery. See section 4 of the Statement of Common Ground.
- 1.5 For information, Hethersett Land Ltd is taking forward the promotion of the land at Hethersett on behalf of landowners in control of land to the north and south of Hethersett.
- 1.6 The location and extent of the land being promoted (approximately 315 hectares) is shown in Appendix A.
- 1.7 The Statement has been sub-divided under the questions posed by the Inspectors in their Matters & Key Questions for Examination at the Hearings Document (20/08/10).

2 **MATTER 3 STRATEGY AND LOCATIONS FOR MAJOR GROWTH IN THE NPA (POLICIES 9 AND 10 AND APPENDIX 5) INCLUDING CONSIDERATION OF RELATED ACCESS & TRANSPORTATION ISSUES (POLICY 6) AND OTHER INFRASTRUCTURE ISSUES**

Part A:

Are the absolute and comparative quantities of growth distributed to the main locations the most appropriate and are they founded on a robust and credible evidence base?

Is this pattern of development deliverable in infrastructure and market terms?

What Flexibility exists within the overall strategy to accelerate/defer development in particular locations if circumstances make this necessary?

- 2.1 The Statement of Common Ground between the GNDP and Hethersett Land Ltd confirms the agreed position on Matter 3 (part A). In summary, Hethersett Land Ltd agrees that the Norwich Policy Area, including the A11 Corridor, is still an appropriate focus of growth. The approach of focussing strategic growth at a small number of settlements along the A11 Corridor (Cringleford/Colney, Hethersett and Wymondham) provides for a sustainable development pattern, as evidenced in the Sustainability Appraisal. It also ensures the best prospects of encouraging a step change in non-car use by providing homes close to jobs, services and facilities and on public transport routes with the capability to upgrade to more direct frequent services such as Bus Rapid Transport (BRT), linking communities with the NRP and Norwich City Centre and other destinations.
- 2.2 Hethersett Land Ltd also agree that the Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment demonstrate that there is sufficient suitable, available and deliverable land available to accommodate the proposed major growth in the NPA. This includes along the A11 Corridor and that the evidence suggest there is both a prospective market for new homes in South Norfolk and an identified housing need for social/rented and shared equity accommodation.
- 2.3 Hethersett Land Ltd are satisfied that the GNDP's emerging approach to CIL, particularly arrangements for funding key junctions (Thickthorn), Public Transport, secondary schools etc and the added flexibility for other developer contributions, help to improve the viability of individual growth locations including Hethersett.
- 2.4 However, Hethersett Land Ltd maintain that whilst the village is capable of accommodating at least 1,000 homes in a sustainable development, the earlier JCS options with higher growth

levels for Hethersett (4,000 homes) would have delivered a greater amount of benefits for the settlement and more of the JCS's objectives, particularly in relation to locating new housing close to jobs, services and facilities.

- 2.5 It continues to be Hethersett Land Ltd's opinion that growth beyond 1,000 homes at Hethersett can be accommodated sustainably if it is required and deemed appropriate, for instance to accommodate a proportion of the "smaller sites in the NPA allowance".
- 2.6 The ability of Hethersett to accommodate more than 1,000 homes is acknowledged in the GNDP's previous preferred options for the JCS (i.e. 4,000 homes at Hethersett), the Sustainability Appraisal and the GNDP's response to the Inspector's requirement arising from the Joint Core Strategy Exploratory Meeting, in respect of EM Conclusion Issues 3): ***"The distribution of development, in particular in relation to public transport opportunities (September 2010)"*** confirms that decisions to reduce the numbers at Hethersett were based on political decisions, not on the basis of evidence suggesting higher levels of growth could not be sustainably accommodated at Hethersett.

Part C

Does the JCS make clear, justified and effective growth proposals for Hethersett?

Is it allocated more growth than suggested by its proportion as a key service centre in the hierarchy of centres?

What are the critical infrastructure dependencies for this location and can delivery of growth take place within the timescale set out on p111 of the JCS.

- 2.7 The Statement of Common Ground between the GNDP and Hethersett Land Ltd confirms the agreed position on Matter 3 (part C). In summary, Hethersett Land Ltd agrees that the evidence, including the Sustainability Appraisal demonstrates that Hethersett is a sustainable location for housing growth and provides opportunities to deliver a step change in transport by means other than the private motor car, given its location close to existing and proposed jobs (NRP and Norwich City Centre) and position on Norwich's main public transport corridor.
- 2.8 Hethersett Land Ltd suggests that Hethersett's position as a 'key service centre' in the settlement hierarchy does not artificially limit the level of growth at the village and that the JCS allocates an appropriate level of growth.
- 2.9 Hethersett Land Ltd suggest that all of the various options for growth at Hethersett proposed by the GNDP throughout the JCS's evolution (1,000 to 4,000+ homes) have all been based on robust and credible evidence and justified in terms of the Sustainability Appraisal, Strategic Housing Market Assessment, Strategic Housing Land Availability and other evidence.

- 2.10 Hethersett Land Ltd suggest that the JCS's current policy requirement for "at least" 1,000 homes to be allocated at Hethersett alongside a viable CIL and flexible Section 106 Agreement approach, provides the ability to deliver sustainable development in the village.
- 2.11 Hethersett Land Ltd can demonstrate that the GNDP has correctly asserted that substantial growth and expansion of Hethersett by at least 1,000 homes should be to the North/North East of the village.
- 2.12 Hethersett Land Ltd suggest that there is capacity to accommodate more than 1,000 homes in Hethersett without impacting adversely on the villages character and that there are no technical reasons to limit the growth to 1,000 homes.
- 2.13 However, Hethersett Land Ltd respects the GNDP's decision to reduce the figure from 4,000 homes. Although it does consider that the GNDP earlier 'preferred option' for growth, would have resulted in a more sustainable strategy, than the current option (2+, the Favoured Option).
- 2.14 Hethersett Land Ltd maintains that Hethersett is a suitable location and has capacity to accommodate a proportion of the South Norfolk "smaller sites in the NPA allowance" (1,800 homes).
- 2.15 Hethersett Land Ltd has commissioned a significant amount of technical work to demonstrate that 1,100 homes to the North/North East of Hethersett is deliverable. The key site issues are set out below and a plan highlighting the key issues is included at Appendix B.

Key Site Issues and Infrastructure Dependencies

Landscape

- 2.16 A Landscape Baseline Analysis Report of Hethersett has been undertaken. In summary, the area where landform offers the greatest constraint is in the large fields south west of Thickthorn Hall. Development on this part of the site would have an impact upon the setting of Thickthorn Hall and be visible from areas to the south including the A11. The A11 is also a dominant audible feature within the landscape.
- 2.17 The analysis suggests housing and mixed use development should be focussed to the north of Hethersett. This confirms the conclusion of the GNDP's topic paper: Strategy to Accommodate Major Housing Growth in the NPA (Nov 2009) (section 5.3).

Transport and Accessibility

- 2.18 A comprehensive Trip Generation Analysis and Traffic Assessment has been undertaken and demonstrates that development of 1,100 homes can be accommodated on the local highway network.
- 2.19 The majority of vehicular trips will gain access to the wider highway network via the B1172 and its junctions with New Road and Colney Lane.
- 2.20 To accommodate the traffic, the existing priority cross roads of Colney Lane and the B1172 will require signalisation. There is sufficient highway land available to accommodate this upgrade. Upgrades to the existing Thickthorn (A47) junction are also necessary, which are the subject of ongoing discussions with the 'Thickthorn Forum'.
- 2.21 Other Traffic Mitigation measures that could be considered and delivered as part of the development are:
- Promotion of a sustainable transport corridor along Colney Lane to link with the NRP.
 - Provision of a new and enhanced bus service to serve the site and surrounding community.
 - Improvements to bus services and routes serving the site.
 - Possible dedicated A11 entrance and extension to the Park and Ride site.
 - Increased frequency bus service serving the proposal site between Colney and the Thickthorn.
 - Bus infrastructure quality enhancements including high quality buses and bus stops.
 - Provision of Real-time bus information.
 - Link to Bus Rapid Transit (BRT) and Core Bus Routes identified in the NATs (Norwich Area Transportation Strategy) review.
 - New junctions to provide access to the development.
 - Enhanced cycle and pedestrian access.
 - Cycle route connection to Thickthorn Park and Ride site via existing facilities on B1172.
 - Cycle and pedestrian friendly layout within the site.
 - Improvements to routes to local schools.
 - Improved cycle and pedestrian connections to adjacent land uses.

Utilities

- 2.22 A Servicing Strategy Appraisal has been undertaken relating to the existing infrastructure and provision of potable water, gas, electricity, telecommunications and sewerage for the proposed development of land North/North East of Hethersett.
- 2.23 The appraisal is stage one of the servicing strategy for the Hethersett Growth Area and further investigation and detailed liaison with the utility companies are ongoing as the scheme progresses.
- 2.24 The following summary considers the implications on the viability of utility supply when considering the development scenario of 1,100 new dwellings at Hethersett.
- 2.25 The appraisal concludes that developments of 1,100 is viable with regards to utility supply, although a phased approach to development may be required to ensure adequate foul drainage capacity.

Potable Water Supply

- 2.26 Anglian Water has an existing 12" main that serves the area. It is considered possible that for a development of up to 1,100 dwellings there would be sufficient capacity in the existing water main although localised reinforcement works are likely to be required.
- 2.27 The key issue for water supply is the source of the water, given the potential changes to the local abstraction licences. Investigations are ongoing between GNDP, EA, AWS and Natural England to address this issue.

Gas Supply

- 2.28 National Grid Gas has an existing 300mm high pressure main which crosses the eastern end of the development area, plus a 100mm spur to a high pressure/medium pressure governor station. There are extensive medium pressure and low pressure mains in the general area of development. It is envisaged that sufficient capacity exists in the upstream network to cater for the provision of connections to new developments of 1,100 dwellings.
- 2.29 The site for a new gas governor medium pressure/low pressure will occupy approximately 9.0 m², and will need to be located within the development. It would be expected that the Independent Network Operator will contribute towards the costs for provision of connections.

Electricity Supply

- 2.30 EDF has provided records showing their equipment in the vicinity of the development. The development is likely to compromise up to three 11KV overhead line ring circuits and therefore diversion of these circuits would seem necessary.

- 2.31 EDF has verbally indicated that they do not have capacity within the local 11Kv network to provide connections to the proposed development. For 1,100 dwellings it is likely that the load would need to be served from new substations served from the existing 11Kv network.
- 2.32 National Grid has an existing 400Kv overhead line crossing the site. There are no prescribed distances to be observed between properties and overhead lines, other than the statutory safety clearances. Typically these are achieved by utilising the land below and adjacent as open space.

Telecommunications

- 2.33 BT normally provides the infrastructure free of charge, and they include an allowance per residential unit for any upstream reinforcement. Hence we do not expect that there will be any charges levied for the provision of new connections for a 1,100 dwelling development.

Government Pipelines and Storage Systems

- 2.34 There is an active pipeline crossing the development site that is operated by Government Pipelines and Storage Systems. It extends across the western end of the south-eastern area, parallel to Station Lane, and also across the site to the north-east of Hethersett, between Colney Lane and Beckhithe.
- 2.35 GPSS wayleaves are generally 6.0m wide, extending 3.0m either side of the pipeline. It is possible that this pipeline could be declared redundant and the wayleave terminated as it is not currently being used, however further liaison with pipeline operators would be necessary. In the meantime, the pipeline and wayleave have been incorporated into the Emerging Draft Masterplan.

Surface Water Drainage Strategy

- 2.36 The Greater Norwich Water Cycle Study generally states there are no significant flood risk issues for Hethersett. The Environment Agency Indicative Flood Maps show no significant fluvial or tidal flood risks in the area, although an unnamed minor watercourse to the north-west of the site is shown as being at risk of flooding.
- 2.37 Anglian Water has completed the Pre Development Report, in which it is stated that all alternative methods of surface water would need to be sought for the site, in accordance with PPS25. It is therefore intended that the site will be developed with consideration of the principles of sustainable drainage in order to reduce flow rates so that they closely mimic the natural environment. The proposals will be in accordance with guidance set out by the Environment Agency for the provision of Sustainable Urban Drainage Systems where possible.

- 2.38 The Strategic Flood Risk Assessment for the Greater Norwich Area suggests a number of SUDS components which may be suitable for this site, such as filter strips, swales, infiltration devices (depending on depth to water table), pervious surfaces, green roofs, water butts, ponds/wetlands and detention basins.

Foul Water Drainage Strategy

- 2.39 There is sufficient capacity at Whitlingham Sewage Treatment Works to accommodate a development of 1,100 units at Hethersett. However, technological modifications to Whitlingham Sewage Treatment Works will be required to limit phosphate discharge into the River Yare.
- 2.40 Anglian Water's Pre Development Enquiry Report states that there is insufficient capacity available in the existing foul network at Hethersett to accommodate flows for a development of significant number of dwellings. Options, including 'off-line' storage and more innovative measures, to resolve this issue are currently being discussed with Anglian Water.

Renewable Energy

- 2.41 An Outline Renewable Energy Appraisal has been undertaken to ascertain an appropriate renewable energy strategy for development at Hethersett.
- 2.42 The appraisal has considered the impact of energy efficiency measures required to achieve Code for Sustainable Homes Level 3, 4 and beyond through the use of measures such as increased insulation, passive solar gain and energy efficient appliances.
- 2.43 The following renewable technologies have been considered. The available technologies are rapidly evolving and additional solutions should not be ruled out as the scheme progresses through to detailed design:
- Wind;
 - Photovoltaics;
 - Solar thermal systems;
 - Biomass heating;
 - Biomass combined heat and power;
 - Biofuel combined heat and power;
 - Ground Sourced heating.
- 2.44 The Assessment concluded that it is unlikely that a single renewable energy technology will fulfil the requirements of the proposed development at Hethersett.

- 2.45 For the development of 1,100 dwellings, the policy requirements are likely to be met with 'bolt-on' renewables such as solar hot water, photovoltaics and ground source heat pumps.

Archaeology

- 2.46 Archaeological Assessment has been undertaken by NPS. The Assessment considers the archaeological potential and historical significance of an expanse of predominantly arable land surrounding the village of Hethersett. All records that fell within a 1.5km radius of the potential development area were examined. A wide range of documentary and cartographical sources were also consulted.
- 2.47 Overall, the evidence suggests that this wider area is one of reasonably high archaeological potential, having clearly been occupied and utilised throughout most periods, although archaeological potential within the proposed development area is more limited.
- 2.48 Two prehistoric round-barrows, both Scheduled Monuments, are present within the 1.5 km radius, but are well outside of the proposed development area. Also, a probable Roman villa complex is located to the west outside of the proposed development area. A medieval moated site and two medieval hollow-ways are the only other archaeologically significant sites represented by visible remains, but are also outside of the proposed development area.
- 2.49 A possible Early Saxon cemetery is identified within the proposed development area and this has been incorporated in to the Emerging Masterplan. Further investigations will be undertaken to support the submission of the planning application.

Ecology

- 2.50 Ecological Assessment has been undertaken. The most recent ecologists report suggests that whilst there is potential for the presence of great crested newts in the general area, actual populations in the area are sparse. There is no evidence yet of water voles, otters or reptiles. The Specialist Botanical Survey as reported only unremarkable findings.

Education

- 2.51 Hethersett Junior and High Schools share a 8.29 ha campus. Hethersett High has a capacity of 810 places and is almost full. 1,000 dwellings at Hethersett would generate a need for 140 additional places. (2.45 ha additional). The Norfolk County Council Education Department have confirmed there are deliverable options for accommodating additional places.

Planning Application and Delivery Intentions

- 2.52 The intension is to submit a planning application in early summer 2011, following the publication of the Inspector's Report/JCS's adoption. If consent is achieved in 2011, the

strategic development site at Hethersett could begin to deliver units in 2012/13, and there is capability to achieve development rates of approximately 100 dwellings per year by 2015, and higher rates thereafter.

Part K - Public Transport in the A11 Corridor. Is there a clear and convincing strategy to ensure that adequate bus provision will be made in line with housing growth at a stage sufficiently early to influence travel patterns?

- 2.53 The Statement of Common Ground between the GNDP and Hethersett Land Ltd confirms the agreed position on Matter 3 (part K), public transport. In summary, Hethersett Land Ltd considers that the A11 Corridor encompassing Cringleford, Hethersett and Wymondham and the NRP is already well served by public transport (bus and rail). It is apparent that the Newmarket Road Corridor already has a high level of bus priority, with scope for further improvement.
- 2.54 Hethersett Land Ltd also agrees that the key transport intervention of a BRT service linking Wymondham, Hethersett, Cringleford and the City Centre is achievable and deliverable. The scale of housing growth proposed, including a proportion of the "smaller sites in the NPA allowance" within the corridor and existing households, taking cumulatively is sufficient to support a viable BRT route.

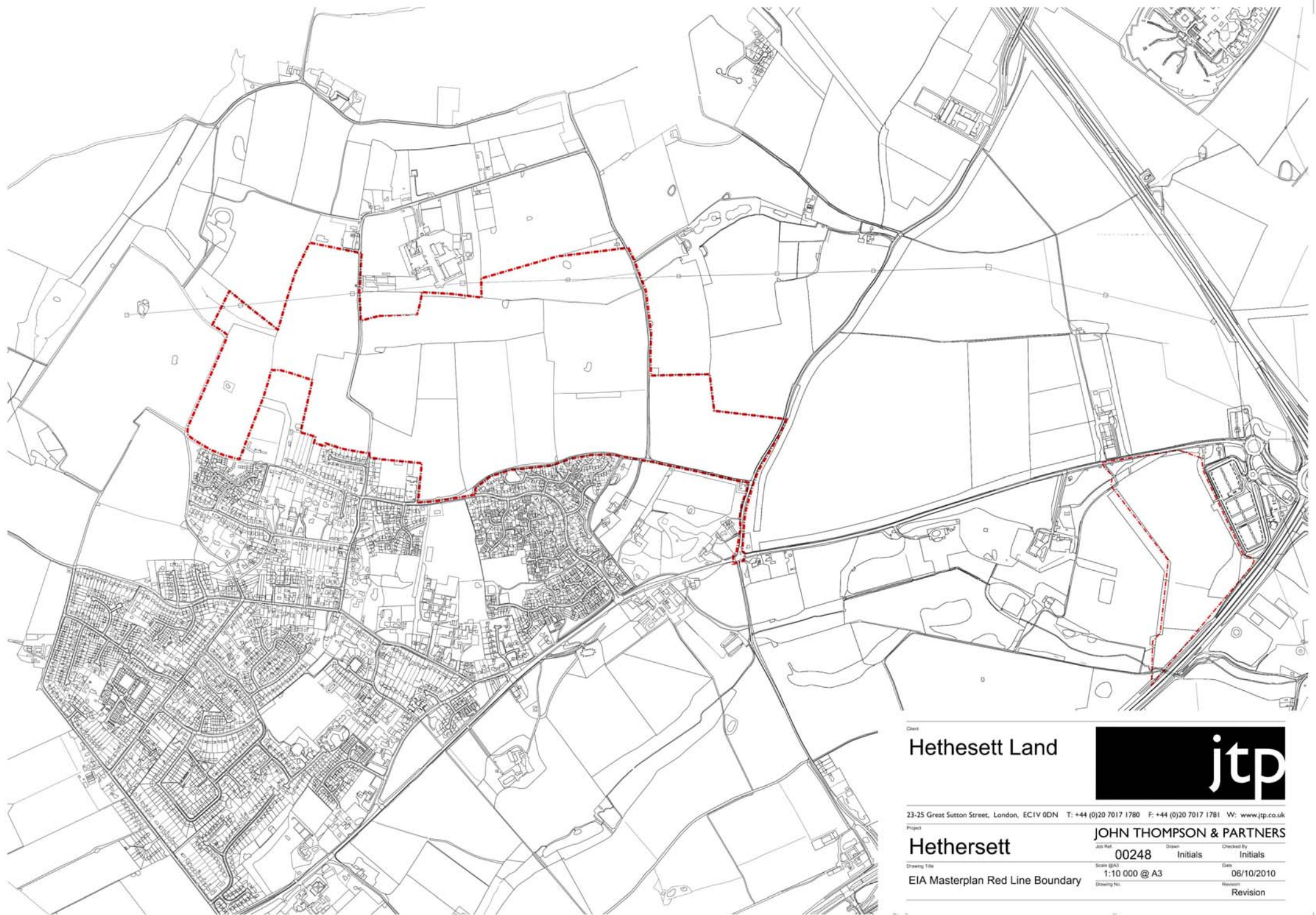
Conclusions

- 2.55 Hethersett Land Ltd consider that the emerging approach to CIL and the added flexibility to Section 106 contributions, helps ensure the delivery of the levels of housing proposed at the growth locations along the A11 Corridor, including Hethersett.
- 2.56 Hethersett Land Ltd considers that the JCS Spatial Strategy focus on the NPA and in particular, the A11 Corridor still represents an appropriate focus of growth.
- 2.57 Hethersett Land Ltd consider there to be a substantial market demand for housing along the A11 Corridor, including Hethersett and an unmet need for affordable homes.
- 2.58 Hethersett Land Ltd can confirm that there is an ability to accommodate more than 1,000 homes at Hethersett, and that earlier JCS growth options with higher growth levels at Hethersett represented a better and more sustainable pattern of growth than the Favoured Option. However, Hethersett Land Ltd acknowledges the GNDP's decision to reduce the figure for Hethersett from 4,000 homes to at least 1,000 homes.
- 2.59 Hethersett Land Ltd can demonstrate that there is an ability to accommodate more than 1,000 homes if required to accommodate a proportion of the "smaller sites in the NPA allowance" (1,800 for Hethersett).

- 2.60 Hethersett Land Ltd are promoting proposals for up to 1,100 homes at Hethersett in-line with the JCS and can demonstrate with evidence that at least this amount of development can be accommodated to the North/North East of Hethersett within sustainability limits, subject to a CIL helping to fund key infrastructure improvements such as the Thickthorn Junction and secondary school improvements etc.
- 2.61 Hethersett Land Ltd intends to submit a planning application for growth at Hethersett in line with the JCS following the publication of the final Inspector's Report/Adoption of the JCS in early 2011. If the scheme is consented in 2011, it is anticipated new homes will begin to be delivered in 2012/13. Delivery rates are anticipated to reach 100 homes per annum by 2015, increasing to higher levels thereafter.

Appendix A

Plan Indicating Promoted Land



Client
Hethesett Land



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Hethersett

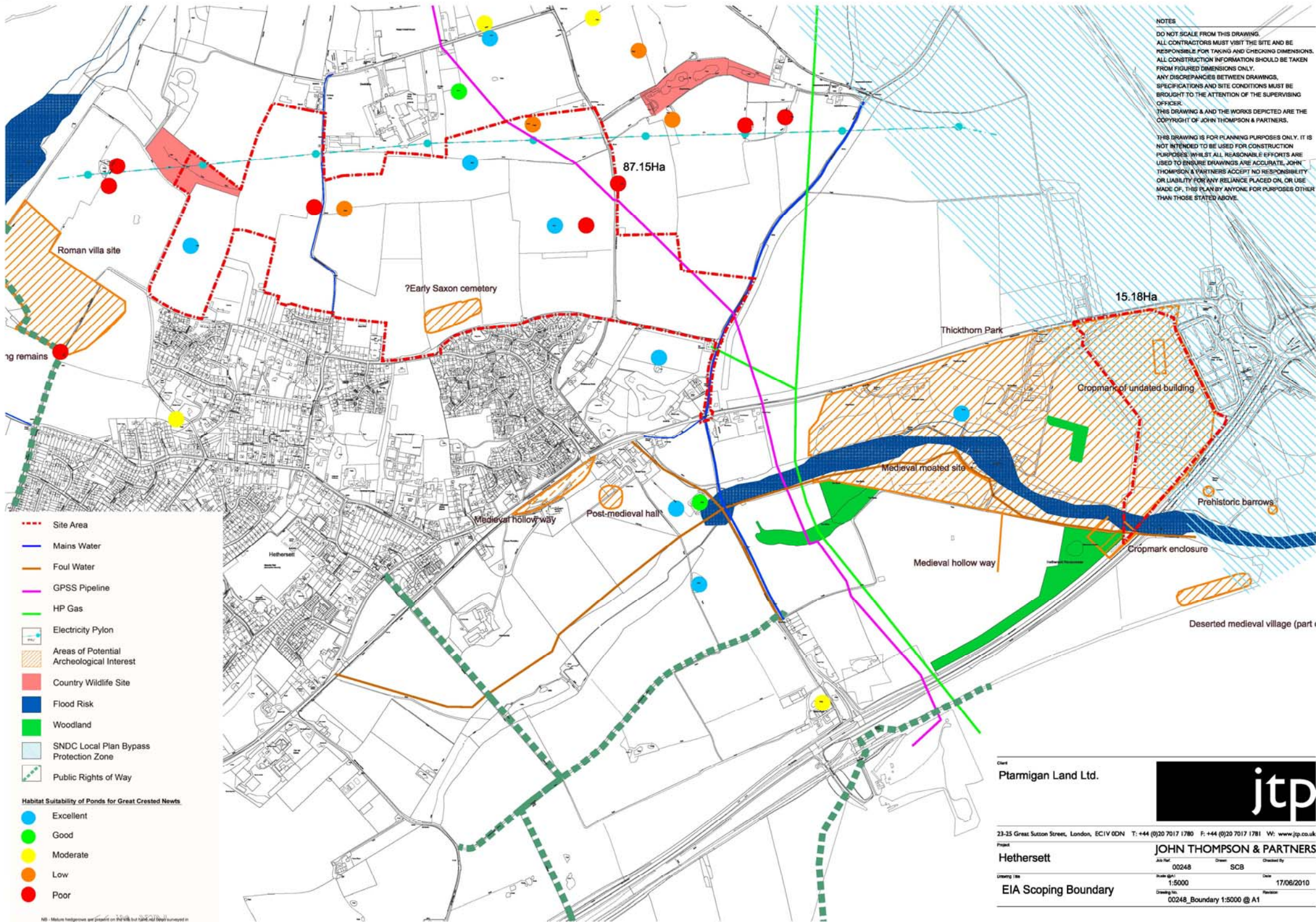
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Drawing Title Scale @ A3 Date: **06/10/2010**

EIA Masterplan Red Line Boundary Drawing No. Revision

Appendix B

Opportunities and Constraints Plan



NOTES

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- Site Area
- Mains Water
- Foul Water
- GPSS Pipeline
- HP Gas
- Electricity Pylon
- ▨ Areas of Potential Archeological Interest
- ▨ Country Wildlife Site
- ▨ Flood Risk
- ▨ Woodland
- ▨ SNDC Local Plan Bypass Protection Zone
- Public Rights of Way

- Habitat Suitability of Ponds for Great Crested Newts**
- Excellent
 - Good
 - Moderate
 - Low
 - Poor

NB - Mature hedgerows are present on the site but have not been surveyed in detail.

Client
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Project
Hethersett

00248 SCB

Scale 1:5000 Date 17/06/2010

Drawing No. 00248_Boundary 1:5000 @ A1

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EIA Scoping Boundary

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