

FINAL FOR SUBMISSION

GREATER NORWICH LOCAL PLAN DOCUMENTS:

- **GROWTH OPTIONS**
- **SITE PROPOSALS**

REGULATION 18 CONSULTATION JANUARY 2018

ON BEHALF OF MR PETER RUDD

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APPENDICES:

None

1. GROWTH OPTIONS

Question 1: Do you agree with the draft vision and objectives for the plan?

- 1.1 For the main part, my client is generally in support of the draft vision and objectives. However, the objective regarding homes warrants further refinement.
- 1.2 The 'Homes' objective should be focussed on speeding up delivery to reflect the draft NPPF. It is suggested that this should be worded as follows "To enable and facilitate the prompt delivery ..."
- 1.3 As part of this, Councils should be encouraged to work with landowners and developers to ensure that the speed of planning decision-making is improved and that pre-commencement conditions are kept to a minimum. This will allow the commencement of development to take place as soon as possible and limit the barriers to prompt implementation.

Question 2: Do you support the broad strategic approach to delivering jobs, homes and infrastructure?

- 1.4 Paragraph 4.5 seeks to ensure that greenfield development takes place in accessible locations but this does not take into account the potential for locations to be made accessible by the development proposed. It is suggested that this is clarified by replacing 'accessible locations' with 'locations that are or can be made accessible'. We support the acknowledgement that such developments can help to sustain town and village life – this is consistent with the draft NPPF.

Question 6: Do you agree that windfall development should be in addition to the 7,200 homes?

- 1.5 Yes.

Question 9: Which alternative or alternatives do you favour?

- 1.6 My client favours options 2, 4 and 5 as these would allow for his site at Heywood Road, Diss (GNLP0250) to come forward. The remaining options offer limited growth at Diss and are not supported for that reason. Further submissions on this have been made under the Site Proposals consultation to demonstrate the deliverability of this site.
- 1.7 My client considers that it is right that the eventual option allows for a reasonable proportion of growth at Diss as a main town that is well supported

by facilities and offers the opportunity to deliver sustainable development. For that reason, it is difficult to choose a preferred option and it is likely that a further option that blends the current 6 is likely to be more favourable.

Question 13: Do you support the establishment of a Green Belt?

- 1.8 My client strongly objects to the establishment of a Green Belt around Norwich in any form. It agrees with the comments at paragraph 4.73 that exceptional circumstances required to justify this do not exist.

Question 22 – Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?

- 1.9 The current development plan documents and the summary in the Growth Options document demonstrate that the northern side of Diss is comparatively unconstrained. It is therefore considered that this offers the greatest potential for further development to support the needs of both the town and the wider area.
- 1.10 Previous plan-making exercises have also revealed a local desire for a link road between Heywood Road and Shelfanger Road to assist in addressing local traffic congestion issues. The allocations of development sites in this part of the town could enable this local aspiration to be realised.

Question 23: Do you agree with the approach to the top three tiers of the hierarchy?

- 1.11 Yes

Question 37: Which approach to affordable housing thresholds do you prefer?

- 1.12 Option AN2 is preferred but must be backed by viability evidence and must allow for the full range of affordable housing types to be considered.

Question 38: Which approach do you favour for affordable housing percentages?

- 1.13 Option AH5 is preferred as this would allow for the specific viability considerations of larger sites to be considered at the allocation stage. Such an approach is consistent with the requirements of the draft NPPF. For smaller sites, the level should be restricted to a maximum requirement of 27% with higher proportions permissible at the developer's discretion. This is, of course, subject to appropriate viability testing to demonstrate that such a proportion is deliverable.

Question 41: Which approach to the mix of housing do you support?

- 1.14 AH10 is supported as this is more appropriate to allow site-specifics and market conditions to be considered. The requirements quoted in Figure 6 relate to the whole of the HMA, which includes a wide variety of areas and needs. It would be wrong to apply a blanket requirement – even with a threshold limit. Furthermore, affordable housing requirements are usually assessed on a case-by-case basis having regard to the greatest need at that time and the specifics of the site. This provides further justification to avoid a rigid housing mix policy.

Question 42: Which approach or approaches to housing for older people and care accommodation do you favour?

- 1.15 It is important to recognise that the need for institutional accommodation is in addition to the housing need identified for the purposes of the OAN. Requiring the provision of such space on existing allocations rolled forward or new allocations to be identified would mean that the ability of such allocations to meet the OAN requirements will be reduced. As such, further development sites or greater yields at those sites will be required to ensure that all housing needs can be met. To avoid viability issues on allocated sites it is considered that the most appropriate response would be a combination of options AH12 (specific allocations) and AH13 (criteria-based policy for sites outside of settlements or in alternative use).

Question 44: Which policy approach do you favour to planning for the needs of Gypsies and Travellers?

- 1.16 It is preferred that specific allocations for gypsy and traveller accommodation pitches is provided (option GT1). Option GT2 is not supported as a blanket requirement for such provision on all larger housing allocation sites does not allow for the appropriateness of such use to be taken into account for individual sites.

Question 51: Which approach do you favour for air quality?

- 1.17 The preferred option is AQ2. A blanket requirement for an air pollution statement will add to the material required for a planning submission and will not be justifiable in all cases. AQ2 acknowledges that there are other powers available to ensure that air quality can be protected through development proposals.

Question 53: Which option do you support?

- 1.18 The application of either option needs to be ensure that it includes criteria to confirm when it is applicable. The need for either requirement must be fully justified and necessary to make the development acceptable and this is not catered for in the options presented. As such, both options will need to be amended to allow both the specifics of the development site location to be considered and the specifics of the development proposed. The final option should also allow for either commuted payments in lieu of provision or on-site provision (or a combination of the two) – the current options each only allow for one scenario. For that reason, it is not appropriate to choose between the two options.

Question 56: Should the GNLP protect additional Strategic Gaps and if so where should these be?

- 1.19 No – there is an absence of evidence to suggest that this is required.

Question 57: Should option EN1 be included in the GNLP?

- 1.20 Option EN1 will need to be supported by clear evidence to demonstrate that it is the most appropriate method of securing a low carbon future and embrace the policies set out in the draft NPPF. Caution is recommended on adopting a blanket requirement for carbon reduction through renewable energy initiatives as this can often disregard the embodied carbon within the technologies. They may assist in tackling fuel poverty issues but may not deliver the low carbon future that is envisaged by this option. Until such evidence is provided it is not possible to express an opinion about this option.

Question 59: Do you support option COM1 for the distribution of affordable housing?

- 1.21 No - option COM1 is poorly worded. The clustering of affordable housing should not be deemed as unacceptable. Where appropriately designed, such approaches can ensure an appropriate compromise between management of assets by the RSLs and a cohesive community. The option should be amended to acknowledge that clusters are acceptable and that the clusters should be spread evenly across a development.

Question 60: Which option do you support?

- 1.22 The need for Health Impacts Assessments is considered to be unsubstantiated and a duplication of the matters that would be considered through the

development management process. For that reason, option COM3 (no requirement for a HIA) is supported.

Question 65: Which option do you support?

- 1.23 The issue of action to be taken in the event of a lack of a five-year supply is now covered in the draft NPPF. An Action Plan will be required to address any shortfall and that plan will need to be based on the reasons behind any shortfall. For that reason, it is not possible to select a preferred option at this stage and it is suggested that the options are refined to allow for the causes of any shortfall to feature in the appropriate response.

2. SITE PROPOSALS DOCUMENT

- 1.1 My client has previously put forward site GNLP 0250: Land at Heywood Road, Diss for housing development. This was deemed suitable for development in the HELAA. The Site Proposals document notes at page 180 that this is one of six sites proposed in this area and that these could come forward partially, in full or as part of a large scheme. Further submissions regarding these sites are made below.
- **Highways and access:** My client confirms that it is intended that the site will be accessed by Heywood Road and that appropriate foot and cycle links will be integrated within the development scheme. In recognition of local aspirations, my client is also willing to consider a scheme that allows for the potential to deliver a new link road through to Shelfanger Road should this be recognised by the highway authority as delivering benefits to the transport network.
 - **Drainage:** The site is large enough to deliver on-site surface water drainage requirements. Foul drainage upgrades will be a matter for the service provide under new regulations that will come into force in April 2018.
 - **Landscape and ecology:** The site is large enough to provide a suitable buffer to address landscape impact considerations and provide biodiversity enhancements. The site currently comprises a largely featureless arable field immediately adjacent to Diss Cemetery and opposite existing residential development within the settlement. A carefully designed layout would work with the locally characteristic styles of vegetation to provide a visual and physical buffer to limit or mitigate publicly accessible views towards the site. Current views across the wider landscape, which are available from the footpath along the site's northern boundary, would be maintained. A robust landscape framework would be designed to respect the site's village edge location and successfully integrate the development into the surrounding landscape.
 - **Comprehensive development:** My client is willing to consider working with adjoining landowners as part of a wider development opportunity for the town.
 - **Deliverability:** My client has been approached by a housebuilder interested in taking this site forward and will explore this further should the potential for allocation develops. The precise yield from this site will be a matter for further consideration through discussion with the Councils.
- 1.2 It is considered that this site is deliverable and that the impacts identified in the HELAA can be mitigated – as acknowledged by the HELAA ratings – and requests that it be taken forward for consideration as a site allocation.