



**GNLP Regulation 18 Consultation Response
March 2018**

**Land off Manor Road, Newton St Faith
GNLP1054**

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1. Executive Summary

This site on land off Manor Road, Newton St Faith is being promoted as a strategic housing site to extend existing site allocation HNF1, Land off Manor Road, Newton St Faith in the Broadland Site Allocations Development Plan Document.

The site can deliver circa. 70 new dwelling units including affordable homes and plots for self-building housing.

2. Site Introduction and Description

The site comprises some 2.5 ha and is located east of Manor Road and to the south of the existing village of Newton St. Faith. The site is bounded by existing residential development to the north and east and residential gardens and open fields under pasture and arable use to the south and west. The site seeks to extend the existing HNF1 housing allocation off Manor Road as contained in the adopted Broadland Site Allocations Development Plan Document. A Location Plan showing the location of the site is contained within Appendix A of this document.

The site therefore represents a rational and logical expansion area for new housing development within the village, while respecting all relevant planning considerations material to the development of the site.

The site is not subject to any environmental designations that would render it unsuitable for residential use and there are no listed buildings on or within close-proximity to the site. The site is further not located within a Conservation Area. The site is also located within Flood Zone 1 and as such is at limited risk of flooding.

The site was formally cultivated for agriculture and comprises fields divided by rows of well-established hedgerows and trees. As such the site is well contained within the landscape with a well-established hedgerow dividing the it from open agricultural to the east and south east.

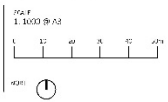
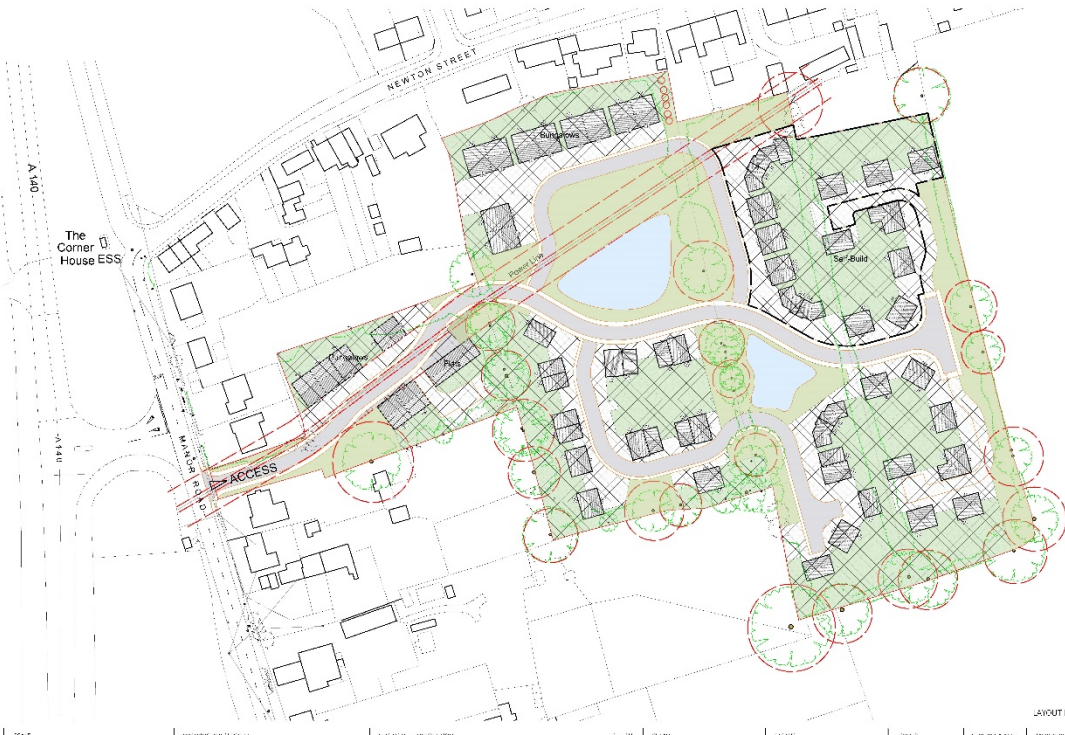
By retaining (where practicable) and supplementing the existing boundary treatment, it is considered possible to provide a well-planned development that can be assimilated within the surrounding landscape and to create a defensible boundary to the extended settlement limits.

The scheme that is designed by Chaplin Farrant proposes a new vehicular and pedestrian access into the site from Manor Road. The access design accords with adopted standards and as such will not have an adverse impact on highway safety.

There is market demand for housing in this area and the housing site is deliverable within the emerging Local Plan period.

An indicative layout plan showing how the housing and green spaces areas could be laid-out and accommodated with the site is contained in Appendix B of this document.

3. Site Location



DRAINAGE SYSTEMS	
	Surface water drainage
	Coloured Catch or Drains
	Pluvial Catchers
	Residential Development
	Highway

BOUNDARIES	
	Site Boundary
	Access

GENERAL NOTES	
1. ALL DEVELOPMENTS TO BE IN ACCORD WITH THE LOCAL DEVELOPMENT PLAN.	
2. ALL DEVELOPMENTS TO BE IN ACCORD WITH THE LOCAL DEVELOPMENT PLAN.	
3. ALL DEVELOPMENTS TO BE IN ACCORD WITH THE LOCAL DEVELOPMENT PLAN.	

PROJECT INFORMATION	
CLIENT:	W. A. W. INC.
PROJECT:	RESIDENTIAL DEVELOPMENT
LOCATION:	Newton St. Newton, De. De.
DATE:	10/10/2010
SCALE:	1:1000

DRAWING INFORMATION	
DATE:	10/10/2010
SCALE:	1:1000
PROJECT:	RESIDENTIAL DEVELOPMENT
LOCATION:	Newton St. Newton, De. De.
DATE:	10/10/2010
SCALE:	1:1000

Chaplin Partners

 CONSULTANTS

4. Site Opportunities

As advised previously there are no obvious constraints to development that would prevent the delivery of circa. 70 new dwelling units within the emerging Plan period.

The scheme is financially viable and as such affordable housing and some self-build plots can be delivered as part of the scheme to meet a known demand locally.

The opportunity also exists to share access, drainage and servicing costs with the developers of the allocated NHF1 site to the south. This would also ensure that allocated site NHF1 is able to come forward without further delay.

The opportunity also exists to retain and develop existing lines of mature tree and hedgerow planting within the site as part of the final scheme design. As such the scheme will also deliver net environmental gains for nature and improve existing and future residents' quality of life.

5. Consultation Questions

**answer/delete when appropriate

Section 3 – The Vision and Objectives for Greater Norwich

1. Do you agree with the draft version and objectives for the plan below?

Yes, we broadly agree with the vision and objectives for Greater Norwich to 2036 as set out at Figure 1, subject to our more detailed representations on specific issues below.

Section 4 – The Strategy

Delivering jobs, homes and infrastructure

2. Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1-4.7?

The Greater Norwich Local Plan is an opportunity to make the wider Norwich area a hub for investment, commercial activity and high- quality place making, which will be of benefit to all who live and work there, building on the significant existing attributes.

We welcome the joint working of the different authorities, who will lead the planning process for this Plan, in our view to take the required strategic view essential to the future prosperity of the Greater Norwich area.

There is a recognition in the Regulation 18 consultation of the positive attributes of the Greater Norwich area, which are supported. However, to ensure a bright and prosperous future an ambitious strategy is essential, which also respects existing key characteristics.

We have serious concerns regarding the calculation of the overall housing requirement for the plan period as set out in our answer to question 4 below. The favoured option must be to deliver forecast jobs growth plus additional growth. We are of the view that a realistic assessment of the requirement would lead to a figure of between 11,000-14,000 homes in order to deliver City Deal jobs growth aspirations.

Job Targets

3. Which option do you support for jobs growth? (refers to options on pg.28)

There is a recognition in the Regulation 18 consultation of the positive attributes of the Greater Norwich area, which are supported, however to ensure a bright and prosperous future an ambitious strategy is essential, which also respects existing key characteristics.

The Greater Norwich Local Plan is an opportunity to make the wider Norwich area a hub for investment, commercial activity and high-quality place making, which will be of benefit to all who live and work there, building on the significant existing attributes.

The favoured option must, therefore, be to deliver forecast jobs growth plus additional growth (Option JT1).

Calculating the Housing Numbers for the Plan

4. Do you agree that the OAN for 2017-2036 is around 39,000 homes?

The overall housing requirement number of 7200 dwellings derived from an OAN of around 39,000 is not supported and is considered to be too low.

The GNDP's 2016 call for sites consultation considered that sites for around 12,000 new homes were needed. It is surprising that this has reduced so significantly to 7200 for this round of consultation. We are very doubtful that this figure is sufficient to meet the housing requirement for Greater Norwich for the period to 2036.

At this point in time we do not support the use of the Government's proposed methodology for the calculation of OAN as set out in the consultation paper 'Planning for the Right Homes in the Right Places'. This is still at the consultation stage and has been subject to a significant number of representations objecting to various aspects of the proposed calculation e.g. from the Planning Officers Society, Homebuilders Federation and the RTPI. One of the many failings of the proposed methodology is the absence of consideration of economic objectives. There is no certainty that this methodology will come into effect, either in its current form, or at all and we cannot, therefore, understand why it is being used at this point in time.

We do not support the figure of 7200 homes arising from the use of the draft Government methodology for the calculation of housing numbers. Para 4.17 of the Growth Options Document states that the OAN figure for Greater Norwich is 38,988 dwellings for 2017 - 2036 based upon this methodology. This figure should be used with caution because it uses figures taken from the 'Application of proposed formula for assessing housing need, with contextual data' table that accompanies the Government Consultation document. This is an indicative assessment of dwellings per annum need based upon a draft formula for the period 2016-2026, rather than for the period 2017 -2036. Furthermore, it does not consider economic objectives for the area.

Government draft OAN figure 2017-2036:	38,988
Minus commitments of:	35,665
Sub Total:	3,323
Plus 10% buffer on 38,988	3899
TOTAL HOUSING REQUIREMENT (2017-2036 as contained within Growth Options Document)	7222

The calculation of the OAN should in any event be only a starting point for calculating housing numbers for the plan. The Government OAN figure does not include the housing necessary to deliver economic objectives via the City Deal which has been agreed with Central Government in order to help turn knowledge into growth and 13,000 additional jobs'. Delivery of these objectives is necessary to ensure that the area is eligible to receive the related Government funding for infrastructure and business support, enterprise and innovation that is due from this. We consider that it is important that the City Deal requirements are included as they have already been committed to and will contribute to the Greater Norwich and wider economy.

Plan makers are entitled to utilise different methods of assessing need to the Government's draft methodology and if these produce figures that are higher, the Government proposes that Inspectors should consider such approaches sound unless there are compelling reasons to indicate otherwise. Therefore, where it is sensible to propose higher figures based on employment growth or higher affordable housing needs there is scope to do this and the "significant contribution" that Government sees the City Deal making "to the recovery and future growth of the UK economy" (source: Greater Norwich City Deal) is valid justification for this.

Furthermore, paragraph 158 of the NPPF requires that Local Plans ensure that strategies for housing and employment set out in their plans are integrated and take full account of relevant market and economic signals. Not to include the City Deal requirements would be a failure to meet this requirement.

If the City Deal housing requirements are added to the Government OAN figures the housing requirement for the period 2017-2036 should be as follows:

Government draft OAN figure 2017-2036:	38,988
Minus commitments of:	35,665
Sub Total:	3,323
Plus, City Deal Housing Requirement from 2017 SHMA (SHMA fig:101)	8,361
Subtotal:	11,684
Plus 20% buffer on sub-total (see qu. 6 reasoning below):	2337
TOTAL HOUSING REQUIREMENT (2017-2036):	14,021

We consider that the up to date Strategic Housing Market Assessment June 2017 figures for the calculation of the housing requirement should be used until the Government’s methodology is formally put into practice. The SHMA sets out a Policy -on full objectively assessed need for housing for the period 2015-36 for the Greater Norwich Area of 44,714 **including** the City Deal housing requirement (Figure 96: Central Norfolk Strategic Housing Market Assessment 2017). This would indicate a residual requirement of 10,859 homes 2015-2036 taking into account a 20% buffer:

Policy-on SHMA OAN figure including City Deal:	44,714
Minus commitments of:	35,665
Subtotal:	9,049
Plus 20% buffer on sub-total (see qu. 6 reasoning):	1810
TOTAL HOUSING REQUIREMENT (2015-2036):	10,859

Paragraph 5.7 of the SHMA states:

” We would note that in the Central Norfolk SHMA 2015, the potential impact of the City Deal was considered part of the OAN, but greater clarity now indicates that it is an aspirational jobs target which **should be treated as part of the housing requirement** (our emphasis), not the OAN.”

It is important that the City Deal requirements are not ignored and are included in the final housing requirement figure as they have already been committed to and will contribute to the Greater Norwich and wider economy. This should be the case whether the Government or SHMA OAN methodology is used.

Both scenarios suggest that the housing requirement to 2036 should be significantly **higher** than the 7200 homes specified in the Growth Options Document and a figure in the range of 11,000 to 14,000 would be more appropriate.

We note that the Growth Options Document is unclear about the proposed base date of the plan and we consider that clarity on this is required once the OAN methodology is confirmed.

Rebasing the start date of the Local Plan to 2017, should not be used as an excuse to reduce previous backlog. Both above methodologies are set to different plan start dates, but both are intended to take into account previous backlog in assessing the housing requirement going forward.

We also consider that the deliverability of some of the existing 35,665 commitments may be questionable and further consideration should be given to this to ensure that it is a robust figure to use in the calculation of the housing requirement.

5. Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?

The figure of 7200 homes is considered to be too low for the reasons set out above and also because a 10% delivery buffer is too low. This is particularly the case bearing in mind the track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current Joint Core Strategy. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area. Whichever of the 6 growth options, or variations on them is finally chosen, it is likely that the vast majority of housing will be allocated in locations in and around Norwich because this is a sustainable model for future growth. All of the growth options show over 70% of housing to be located within the Norwich Policy Area. We consider that in order to ensure competition and choice in the availability of housing land and reduce the future likelihood of lack of 5-year supply, a 20% buffer should be added to the OAN figures for the purposes of calculating the housing requirement. Windfalls should not be relied upon to make up any shortfalls. (see question 6 for more information).

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

Paragraph 4.24 of the plan states that “based upon current trends and projected future delivery, it is estimated that an additional supply of up to 5,600 dwellings could be provided during the plan period on “windfall” sites. This is likely to be an over estimate. Recent trends have been very much influenced by the lack of 5-year housing land supply within the Norwich Policy Area. If during the new plan period there is no longer a shortage of 5-year land supply, then the amount of delivery on windfall sites will be significantly reduced. Windfall development in recent years has also been dependent upon the availability of unallocated brownfield sites within the city and other towns becoming available. Due to the emphasis on brownfield development in recent years it is considered that the availability of this source of windfall is also likely to be reduced during the future plan period. There should not be any reliance placed upon significant amounts of windfall coming forward within the plan period to deliver the required housing numbers. Windfall should be in addition to the final housing requirement number chosen.

Delivering Infrastructure

7. Are there any infrastructure requirements needed to support the overall scale of growth?

Inevitably with any significant housing and employment growth there will be supporting infrastructure requirements. It is essential that these are properly planned for at the outset. There is a need for investment particularly on key infrastructure. The opening of the NDR will help to facilitate growth to the east and north of the city. It is also likely that improvements will be required to A47 southern bypass junctions, e.g. Thickthorn, Longwater to ensure sufficient capacity. Opportunities for better public transport linkages including rail and bus also need to be properly considered.

How should Greater Norwich grow?

Existing Housing Commitment

8. Is there any evidence that the existing housing commitment will not be delivered by 2036?

The existing housing commitment, which comprises allocations in the Joint Core Strategy (JCS) and sites with planning permission, is substantial at 35,665 homes. There has been a track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current JCS. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area. Although at this stage we are not putting forward evidence that the commitment will not be delivered by 2036, we do believe that it should be treated with caution and it is therefore essential that an adequate buffer is added to the housing requirement figure in order to mitigate both under delivery of the commitment and of new allocations.

The Growth Options (options on pg.39-40)

9. Which alternative or alternatives do you favour?

We broadly support Option 3 ‘Supporting the Cambridge to Norwich Hi-Tech Corridor’ with some variations. These variations relate to the overall level of housing proposed, which we consider should be within the region of 11,000 – 14,000 new homes rather than the 7200 set out within the Growth Options Document. The reasons for the additional requirement are set out in our answers to questions 4-6 above.

To accommodate the additional numbers, Growth Option 3 should be amended to also allocate additional housing no’s (circa 1000 units) to the north and east of Norwich on smaller sites such as the site at Newton St. Faith. This will provide short term delivery in this area to supplement larger growth triangle sites where delivery rates have been slow to date and to help provide City Deal housing requirement in association with employment growth around the airport.

10. Do you know of any infrastructure constraints associated with any of the growth options?

As set out in our answer to Question 7 inevitably with any significant housing and employment growth there will be supporting infrastructure requirements. It is essential that these are properly planned for at the outset.

When reviewing the 6 growth options, the delivery of infrastructure by dispersal options becomes difficult. We believe that dispersal Options 4,5 and 6 provide significantly more constraints than Options 1-3.

11. Are there any other strategic growth options that should be considered?

12. Do you support the long-term development of a new settlement or settlements?

Green Belt

13. Do you support the establishment of a Green Belt? If you do, what are the relevant “exceptional circumstances”, which areas should be included, and which areas should be identified for growth up to and beyond 2036?

We do not support the establishment of a Green Belt. This would only serve to push the required housing numbers further into the countryside in order to achieve a protected area around Norwich. This would be unsustainable because it would increase the length and number of journeys into the city and would be likely to have a greater environmental impact on countryside locations.

Norwich City Centre Defining the City Centre Area

14. Should the area defined as the city centre be extended?

Strategic City Centre Policy

15. Do you support the approach to strategic planning for the city centre in 4.80 above?

City Centre Offices

16. What should the plan do to reduce office losses and promote new office development in the city centre?

Retailing

17. What should the plan do to promote retailing in the city centre?

Leisure and Late Night Activity Zone

18. Should the focus for late night activities remain at Riverside, Prince of Wales Road, and Tombland, or should a more flexible approach be taken?

City Centre Housing

19. What should the plan do to promote housing development in the city centre?

Cultural, Visitor and Education Facilities

20. How can the plan best support cultural, visitor and educational uses in the city centre?
Remainder of the Norwich Urban Area and the Fringe Parishes
21. Do you support Option UA1 for the remainder of the urban area and the fringe parishes?
Main Towns
22. Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?
Settlement Hierarchy
23. Do you agree with the approach to the top three tiers of the hierarchy?
Yes, this is supported.
24. Do you favour option SH1, and are the villages shown in appendix 3 correctly placed?
25. Do you favour the Village Cluster approach in option SH2?
25a. What criteria should be used to define clusters?
25b. Which specific villages could form clusters?
25c. How could growth be allocated between villages within a cluster?
The Influence of the Norwich Urban Area
26. Do you support a Norwich centred policy area and, if so, why and on what boundaries?
Section 6 – Topic Policies
The Economy
The Supply of Employment Land
27. What option or options do you support? (refers to options on pg.71-2)
28. Which allocated or existing employment sites should be identified as strategic sites and protected?

29. Are there employment areas that should be identified as suitable for release for residential uses?
30. Are there any new employment sites that should be allocated?
Accommodating Expenditure Growth
31. Should the position of any of the centres in the retail hierarchy be changed?
32. Do any of the existing retail centres have scope to expand to accommodate further floorspace?
The Rural Economy
33. What measures could the GNLP introduce to boost the rural economy?
<i>Access and Transportation</i>
Strategic Transport Issues
34. Are there any other specific strategic transport improvements the GNLP should support?
Promoting Healthier Lifestyles, Sustainable Travel Choices and Greater Accessibility to Broadband
35. Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area?
<i>Design</i>
Options
36. What approach do you support for promoting good design of new development?
<p>We consider that Option DE1 to broadly continue with the existing design and density policy approaches with some relatively minor changes and updating is appropriate. This approach will support good design. Setting more prescriptive design and density policies is likely to be difficult to achieve across such a large and diverse area and should be approached with caution. Setting a policy that satisfactorily deals with City centre apartment sites as well as rural infill sites both in terms of density and design may create more problems than it solves. We consider that a broad policy is more appropriate and that individual site allocation policies could set more prescriptive</p>

site-specific requirements, backed up by Development Management Policies in each of the Districts and the City.

Housing

Minimum Affordable Housing Threshold

37. Which approach to affordable housing thresholds do you prefer?

We favour option AH2 that requires only affordable housing on sites of 11 or more dwellings in line with current and expected Government guidance. We object to option AH1 for the same reason.

Application of Affordable Housing Percentage Requirements on Sites

38. What approach do you favour for affordable housing percentages? (refers to options on pg.87)

We consider that the simpler the affordable housing policy is, the more likely it is to deliver required affordable provision across the Greater Norwich area and to speed up the planning process by eliminating lengthy negotiations on site viability. The affordable housing target for Greater Norwich has not been met on annual basis for the past 5 years at least. It would be interesting to know what the average affordable provision has been across all sites greater than 10 units since adoption of the JCS. It is certainly not 33% as per the aim of the JCS policy. It is noted that paragraph 6.8 of the Growth Options Document states that *“seeking less than 27% affordable housing on all sites above the qualifying threshold risks under-delivery of overall affordable housing targets”*, but under delivery of targets is already happening, even with a higher % target. Lowering the target, could actually increase delivery of **all** housing types.

We consider that if a realistic % of circa 20% was set across all sites above the qualifying threshold, it would eliminate the need for viability challenge except in very exceptional circumstances and would give developers the certainty they need to be able to get on and secure planning permissions for schemes at a viable level. This would eliminate significant delay and cost in the planning process associated with lengthy heads of terms and S106 negotiations and would enable developers to get on and deliver the housing on site. At the present time, the affordable housing levels are frequently a major hindrance to securing timely delivery of both private market and affordable housing

Tenure Split for Affordable Housing

39. Do you support the favoured option for tenure split?

We object to a one size fits all tenure split approach. It is considered that tenure split should be considered on a site by site basis depending upon local need and upon what Registered providers want to provide and can fund.

Rural Windfall, Exception Sites and Small Sites

40. Which approach do you think should be taken to rural windfall and exceptions sites? (refers to options on pg.89-90)

We consider that Option AH7 to allow small scale windfall sites adjacent, or close to settlements with development boundaries is appropriate. These sites should be subject to a criteria-based policy to ensure that they are only permitted where they are acceptable in terms of impact on form and character, landscape setting of the village and are immediately adjacent to settlement boundaries. We consider that where such sites are permitted they could provide for a proportion of self-build plots where there is an identified requirement in the location.

Given the sometime irregular shape of settlement boundaries in villages we would propose that “close to” be incorporated into the policy.

Housing Mix – Relative Ratios of House Sizes by Bedrooms

41. Which approach to the mix of housing do you support? (refers to options on pg.92)

We support option AH10 and object to option AH9 as described on the basis that the market will always dictate housing mix delivery based on a known existing demand in each District. Any attempt to apply a blanket housing mix across the entire GNLP area will only serve to frustrate housing delivery and repeat the mistakes of the past that have resulted in missed housing targets and a rolled-up housing need. An overly prescriptive policy is not going to assist in meeting housing delivery targets for any house type.

Housing with Care, Extra-Care Housing and Retirement Housing

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

Houseboats

43. Which of the reasonable alternatives for houseboats do you favour?

Gypsies and Travellers

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

45. Are there any suitable sites for Gypsy and Traveller accommodation you wish to submit?

Travelling Showpeople

46. Do you support the favoured option for planning for the needs of Travelling Showpeople?

47. Are there any suitable sites for Travelling Showpeople accommodation you wish to submit?

Residential Caravans/Park Homes

48. Do you support the favoured option for residential caravans and park homes?

49. Are there any potential locations for new/expanded residential caravan sites that you wish to propose?

Climate Change

50. Do you support the favoured option for climate change policy?

Air Quality

How Should Air Quality be Covered in the GNLP?

51. Which approach do you favour for air quality? (refers to options on pg.104-5)

Flooding

How Should Flooding and Flood Risk be Covered in the GNLP?

52. Do you support the favoured option for flood risk policy?

Nature Conservation, Green Infrastructure and Habitats Regulation Assessment Mitigation

How Should Nature Conservation and Green Infrastructure be Covered in the GNLP?

53. Which option do you support? (refers to options on pg.111)

Lanpro supports a variation of option NC1 where specific housing, employment and a new garden settlement in the Cambridge-Norwich hi-tech corridor are chosen to deliver large areas of strategic green infrastructure. My clients have already made detailed representations promoting a number of sites at Rackheath, Salhouse, Barford, Caistor St Edmund, Mulbarton and Hethel (the new garden village site) to deliver a network of new large green spaces including Country Parks linked to housing and new settlement delivery.

Lanpro considers that the blanket application of option NC1 as an enlarged fixed open space requirement to be delivered on all new housing sites regardless of location, context, scale and viability will not deliver the quantum, or quality, of strategic green infrastructure needed to meet existing shortfalls or offset the impact of planned new housing growth on the Natura 2000 sites (including the Norfolk and Suffolk Broads) quickly enough. This over-and-above requirement will only serve to frustrate development on viability grounds. Furthermore, this new dispersed network of extra green space on housing sites in conjunction with Whitlingham County Park will also not be sufficiently attractive to mitigate against the inevitable recreational impacts of new growth on the North Norfolk Coast SAC, SPA and Ramsar, The Broads SPA and Broadland SPA and Ramsar. This is evident through the on-going application of a similar extra green space policy in Broadland District Council area that is doing very little to meet overall open space targets/existing deficiencies within the Norwich Policy Area.

We further consider that the pooling of offsite payments as proposed under option NC2 will also not work for the same reasons. The problem being that land on the edge of existing urban areas where sustainable growth is being focused has clear hope value and is therefore typically not for sale for low-value open space and recreation uses.

The clear and obvious way forward is to select specific housing sites as a focus for growth around the City of Norwich that are sufficiently large to accommodate this shortfall and open space requirement and to make open space delivery (quantum, type, equipment required and phasing) a requirement of the allocation in order to provide meaningful Green Infrastructure.

54. Do you think any changes should be made to the Green Infrastructure network?

We consider that changes need to be made through an expansion of the existing Green Infrastructure network around Greater Norwich. We favour an alternative approach focused around the deliver new large housing allocations enabling the linked delivery a network of new County Parks as a properly costed requirement of development. We have assembled a number of sites in the following locations that are fully costed and can deliver the following as dedicated mixed-use allocations:

- Barford (circa. 150 dwellings delivering 29ha);
- Rackheath (circa. 300 dwellings delivering 32 ha);
- Salhouse (circa. 90 dwellings delivering 7 ha);
- Hethel (circa. 2-3000 dwellings as a new garden village delivering 101ha);
- Mulbarton (circa. 175 dwellings delivering 10ha); and
- Caistor St Edmund (circa. 300 dwellings delivering 24.5ha).

This linked housing and new strategic green infrastructure approach will deliver circa. 203.5 ha of new green infrastructure and open recreational spaces in the form of Country Parks for public use. The County Park locations have been selected as they are all on main road corridors, on the edge of existing sustainable growth settlements and are also accessible to walking, cycling and public transport.

This smart approach to meeting growth and open space requirements will allow people (both existing and future residents) to live healthier lives in locations that they don't feel the need to escape from at the weekends to reduce the impact to the Natura 2000 sites and on-going and increasing costs to the public purse.

Landscape

Landscape Character and Protection

55. Which of these options do you favour? (refers to options on pg.115)

Strategic Gaps

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

Energy

57. Should option EN1 be included in the GNLP?
Water
58. Do you support option W1?
Communities
Location of Affordable Housing within Sites
59. Do you support option COM1 for the distribution of affordable housing?
Health Impact Assessments
60. Which option do you support? (refers to options on pg.123)
Neighbourhood Planning
61. Do you support option NP1? If so, which GNLP policies should be “strategic”?
Culture
How Should Culture be Covered in the GNLP?
62. Which option do you support? (refers to options on pg.126-7)
The Broads
63. Do you support option BR1?
Section 7 – Monitoring the Plan
Monitoring of the GNLP
<p>64. Are there any current indicators that should be excluded or included in the GNLP monitoring framework?</p> <p>The existing indicators on which the JCS is monitored are considered appropriate to carry forward. Additional indicators that should be included are:</p> <ul style="list-style-type: none"> ▪ the proportion of housing delivery that is happening on the allocated sites. At the present time a significant provision of delivery is taking place on 5-year land supply and windfall sites. The proportion taking place on the allocated sites is not understood. In order to assess how effective the plan is, it is considered that this measure is essential. ▪ the provision of self-build plots, particularly if Policy Option AH7 is drafted to include provision of self-build plots.
Shortfall in Housing Land Supply

65. Which option do you support? (refers to options on pg.131-2)

We note the policy Option HLS1 to allow the most appropriate HELAA sites to come forward if there were no 5-year land supply. We are concerned that this approach will be difficult to put into practice. If this approach is taken it will presumably be based upon the development hierarchy but how will locations be prioritised between South Norfolk and Broadland in particular? The level of assessment of HELAA sites is minimal and the onus is on the Councils to undertake this rather than the landowner/developer. It will be difficult to prioritise sites based on limited assessment information, in locations where there are multiple sites available. How will this process be undertaken in a fair and transparent way outside of the Local Plan process? It is therefore questionable whether this approach would actually provide a simpler and quicker process than Option HLS2.

We consider that Option HLS2 requiring a short, focussed review of the local plan to allocate more deliverable sites is the only reasonable approach because it is fair and transparent. This also places the onus upon the promoter to provide evidence regarding site suitability and delivery. The need for such a review should be kept under continuous review based upon annual monitoring reports. This was the approach recommended by the Inspector in relation to housing shortfall in the Broadland part of the NPA for the JCS and JCS policy 22 was put in place for this purpose, although it is noted this has not been implemented.

Continuing to allow planning permissions on a 5-year land supply basis until the short focussed review has been completed is a reasonable approach and if an appropriate buffer is added to the housing requirement figure during plan preparation (see our response to question 5), then the likelihood of there being insufficient 5 year housing land supply should be minimal in any case.

General Questions

66. Are there any other issues relating to the GNLP you would like to raise?

6. Site Assessment

The HELAA capacity assessment December 2017 has assessed the suitability and availability of sites for residential development in broad terms by means of a desk top assessment and advice from a range of technical consultees. It identifies potential constraints to development and/or impacts of developing a site which may need further investigation and additional measures to facilitate development e.g. additional infrastructure or mitigation.

We have commissioned more detailed technical assessments on a range of issues from specialist consultants which have been summarised in Section 4 above. These have enabled us to draw more detailed conclusions on the suitability of this site as set out below:

Constraints Analysis	HELAA Assessment	Lanpro Assessment
Access	Amber	Amber
Accessibility to Services	Green	Green
Utilities Capacity	Green	Green
Utilities Infrastructure	Green	Green
Contamination and Ground Stability	Green	Green
Flood Risk	Green	Green
Market Attractiveness	Green	Green
Impacts Analysis		
Significant Landscapes	Green	Green
Townscapes	Green	Green
Biodiversity and Geo-diversity	Green	Green
Historic Environment	Amber	Green
Open space and GI	Green	Green
Transport and Roads	Amber	Green
Compatibility with Neighbouring uses.	Green	Green

Lanpro considers that the individual merits of this housing site has been wrongly assessed in the published HELAA scoring. We suggest the above alternative scoring as it better reflect the sites close proximity to the new NNDR, the fact that no listed buildings or historic landscapes are located in close proximity to the site and that the access design although safe has not yet been approved by the Highway Authority.

7. Conclusions

It is demonstrated in this submission that the site promoted is appropriate for housing and is a logical extension to the village to meet current and future housing needs.

As such my client is currently preparing a planning application for the site and is seeking early and meaningful engagement with the Local Planning Authority to deliver the housing scheme proposed.

8. Next Steps

Early engagement will enable all involved in bringing this site forward to meet unmet housing needs to plan positively for new growth and self-building demand within this part of the Norwich Policy Area early in the Plan period.



Appendix A

INDICATIVE LAYOUT PLAN



SCALE
1: 1000 @ A3

0 10 20 30 40 50m

NORTH

DRAWING KEY / LEGEND	
	Public Open Space & Open Space
	Surface Water Infiltration
	Existing Cat A or B trees
	Private Gardens
	Residential Development
	Highway

REV. DATE	DESCRIPTION
A	19.03.18 Self-build added

CH. AU.

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STATUS
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DRAWING
Sketch Site Plan

JOB NO.
P0866

DRAWING NO.
01

REVISION
A

INTELLECTUAL PROPERTY

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51 Yarmouth Road
Norwich
NR7 0ET
T 01603 700000
E office@chaplinfarrant.com

Also at Cambridge and Winchester

www.chaplinfarrant.com



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