



**GNLP Regulation 18 Consultation Response  
March 2018**

**Land to the west of Golf Links Road /  
South of Waterloo Farm,  
Morley St. Botolph**

**Site Ref: GNLP0356**

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## 1. Site Introduction and Description

The JCS recognised that it was vital to the viability of rural settlements to provide for housing growth in villages and towns which was proportionate to their existing size, regardless of whether the settlement was in the Norwich Policy Area (NPA).

Morley was identified in Policy 16 as being an Other Village and not within the NPA. Development at Morley was therefore restricted to within the defined development boundaries to accommodate infill or small groups of dwellings and small scale business or services.

These principles were then carried through to the Local Plan making for the respective partner Councils. The development boundary for Morley was set by South Norfolk Council and is drawn tightly around the existing built form of the village.

The southern extent of the settlement boundary ceases at the Hall Lane and Chapel Road junction. It therefore does not extend along Golf Links Road to encompass existing properties.

The positioning of the settlement boundary has been prohibitive in bringing forward small scale development in the settlement and there are no recent planning approvals for dwellings in the village recorded on South Norfolk's Councils online planning system. The positioning of the settlement boundary is not allowing for the village to provide dwellings proportionate to the needs of a rural settlement of this size.

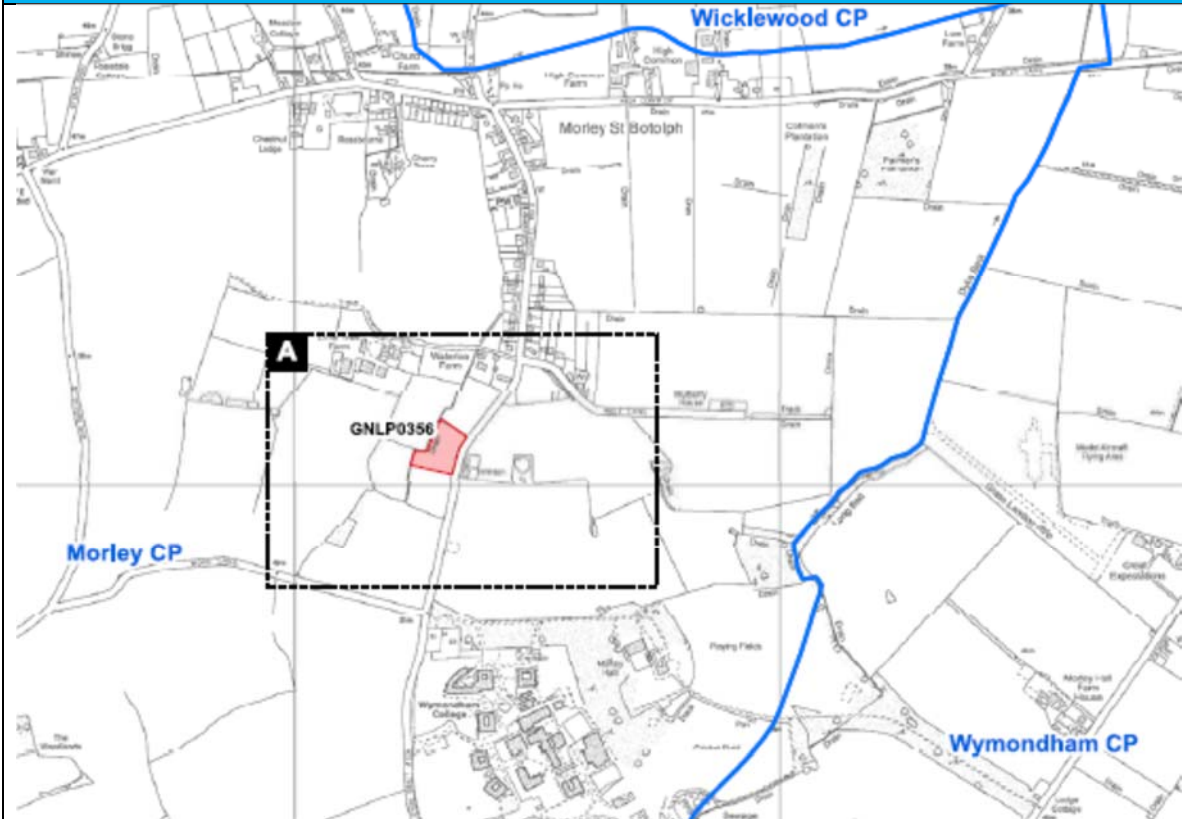
The site is located to the south of the existing settlement of Morley St Botolph and to the North of Wymondham College. The site has access to a range of services and facilities, it is also well located for access to Wymondham and the A11 (See Appendix 1 - Site Context Plan).

The site abuts existing residential land to the north and on its southern and western boundaries is adjacent agricultural land. To the west of the site is Golf Links Road and two detached dwellings.

The site benefits from mature boundary hedging and some new planting, implemented by the landowner. The site is relatively flat and is not known to have any flood constraints.

In agreement with the Parish Council the landowner has allowed for a permissive pathway to be created along the eastern boundary of the site, inside the hedgerow, to connect the village with Wymondham College. The pathway is an unmade field verge with no street lighting and has been fenced off.

## 2. Site Location



### 3. Site Opportunities

It is proposed that the settlement boundary of Morley St Botolph should be extended south to incorporate the Site Ref GNL0356.

The newly formed settlement boundary would provide for:

- residential development with a policy compliant level of affordable housing contribution
- landscaping and ecological enhancements
- provision of a formal footpath along the eastern boundary to replace the permissive pathway, with potential for further enhancements dependant on site allocation size
- vehicular access located and designed in agreement with the Norfolk County Council Highway Authority.
- Self build/Custom Build opportunities

The provision of dwellings on the proposed site allocation will help to deliver a choice of housing in the Wymondham area.

An ability to provide for a range of house types from affordable/starter homes within new estates through to executive houses in semi-rural locations, which still have good access to services and facilities, will be an important factor in being able to attract the talent pool required to make the A11 Tech Corridor growth option a success. South Norfolk Council have experienced this specific issue with the Norwich Research Park.

The allocation of all, or part of, the proposed site will also ensure the long term viability of the village and wider rural economy.

The site is in single ownership and we can confirm that all, or part of the site, can be delivered immediately or at any time between now and 2036. There are no known constraints with the site which would indicate that the proposal is unviable, regardless of whether all or part of the proposal is taken forward.

By virtue of the single ownership and the landowners being prepared to provide a range of site sizes, from 0.5ha up to 1.5ha, there is an opportunity to plan for the short, medium or long term which would build flexibility into the housing delivery process for the Local Plan. A site of 0.5ha would also help the Council meet the Central Government ambition to have 20% of the housing allocations for a Local Plan on smaller sites.

Self Build / Custom Build opportunities could also open pathways to home ownership; which traditional housing developments may not be able to accommodate.

## 4. Consultation Questions

### ***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 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.

We are presently at a unique position, where there is a recognition that growth is needed, there is a need for investment particularly on key infrastructure, clear opportunity areas (particularly around the A11 corridor), potential rail improvements and a recognition that new settlements may form a key role in ensuring delivery.

There is a need for the Greater Norwich area to benefit from the economic growth at Cambridge and not be left behind by its accelerated investment. Greater Norwich at the very least must protect its economic position and not get left behind.

It is our view that there are a series of opportunities that recognise the existing attributes within the area, but which can also secure the levels of economic growth which will be of benefit to those who live and work here.

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 10,000-14,000 homes in order to deliver City Deal jobs growth aspirations.

It is our submission that a new settlement in the Cambridge-Norwich Tech Corridor sitting alongside a range of smaller sites to be apportioned and located as set out in our response to question 9 is the right approach to ensure a choice of sustainable sites and to facilitate delivery of required housing numbers within the plan period. Allocation of this site at Morley St Botolph should form part of that strategy.

## 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?

We broadly support Growth Option 3 to support the Cambridge- Norwich hi-tech corridor. However, 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.

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.

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 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 (see qu6 reasoning below):	2337
<b>TOTAL HOUSING REQUIREMENT (2017-2036):</b>	<b>14,021</b>



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 (see qu6 reasoning):	1810
<b>TOTAL HOUSING REQUIREMENT (2015-2036):</b>	<b>10,859</b>

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 10,000 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 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 the Norwich housing market area, which includes Morely St. Botolph, 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, it should also be noted that many brownfield sites in Norwich are being redeveloped for student accommodation. The ratio of bed spaces to dwellings is yet to be fixed but it is likely to be in a range of 3 beds to 1 dwelling which could reduce the proposed dwelling capacity of the brownfield sites in Norwich. Student accommodation demand in Norwich is yet to be fully understood but it is accepted that the current provision of circa 16,000 students to circa 6,000 purpose built student beds is not sufficient.

Therefore 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.

The East West Rail Consortium, which includes Norfolk County Council and Norwich City Council commissioned Atkins to research the possible impact of an enhanced rail link between Cambridge, Norwich and Ipswich. This concluded that there are economic benefits to be derived from this project, the details of which are now being examined in greater detail. Enhanced links into Cambridge and London, with the return of local rail links, such as in the Wymondham area creates an exciting opportunity for a strategic transport strategy, which will promote growth arising from the A11 route, as well as improved rail, which will support a modal shift.

We also consider that it is essential that healthcare requirements are properly assessed and planned for at an early stage. This requires proper engagement with, and input to, the process of plan making from the NHS to ensure that health facilities are not left over to be provided on a site by site basis. This only serves to fuel local opposition to new development. We consider that, where appropriate, there should be a commitment towards using New Homes Bonus generated by new developments to help fund Healthcare facilities where there may be funding shortfalls. Furthermore, specific healthcare priorities should be identified for funding through the Greater Norwich Growth Programme (Infrastructure Plan) funded by CIL.

Developing at scale to provide new settlements allows the delivery of essential facilities that not only benefit the occupiers of the new dwellings, but also existing and nearby communities. The receipts that will be generated from the development, will mean that new schools can be built, meeting a need for the surrounding area as part of a comprehensive master plan. This is far more secure than the pooling of planning contributions which often fails to deliver. This will also be the case with countryside environments, health and community facilities and sports and leisure. All of these can be secured as part of a comprehensive plan, which due to the certainty created by the planning system, through some form of development company or corporation, the involvement of long term patient investment and avoiding the most expensive land adjacent to towns and cities, can ensure that these will be provided.

This will also be the case with local transport links and infrastructure, which benefit the wider area, but can also enhance existing infrastructure, such as rail and public transport facilities. They

also create an opportunity to provide sufficient quantum of development to support existing employment, create new employment areas and also support training, again for the wider area.

## ***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 aware of any hard 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.

In order to accommodate the additional numbers, Growth Option 3 should be amended as follows:

- Provision of circa – 2000 units to a new settlement within the plan period (more to follow post 2036)
- Allocation of additional brownfield sites within Norwich City if available options can be identified.
- Allocation of additional no's (circa 1000 units) to the north-east on smaller sites to 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.
- Any remaining requirement to be split proportionally between other locations identified under option 3.

The reasons why we consider Option 3 'Supporting the Cambridge to Norwich Hi-Tech Corridor' (as amended) to be the best option for future growth to 2036 are as follows:

1. This option would ensure that the proposed housing growth is closely aligned with the ambitions of the New Anglia LEP Strategic Economic Plan which aims to deliver economic growth in identified Growth locations including Greater Norwich to build on the City Deal and within the A11 corridor. These locations are identified in the Strategic Economic Plan because they host high impact sector activity and are expected to grow over the plan period. There is a recognition within the plan that *“the northern part of the corridor has strong potential to develop its advanced manufacturing sector with a focus on Hethel Science and Technology Park and Snetterton.”*

The Growth Options document recognises that *“The A11 corridor is a major focus of growth, with the route providing key strategic access to London, Cambridge and much of the rest of the UK. The Cambridge-Norwich Tech corridor initiative aims to boost economic development”*. The document sets an indicative target to provide around 45,000 jobs 2015 -2036 (para 4.12 of Growth Options Document) and proposes that the Greater Norwich Local Plan should aim to deliver forecast jobs growth plus additional growth which is consistent with evidence and the City Deal agreement with Government. Option 3 will provide the best support to enable the jobs potential of the Hi-Tech corridor to be realised in addition to jobs growth associated with the city centre, NRP and airport.

2. Option 3 provides the opportunity to focus significant growth in an area which could effectively create an extension of the Cambridge, Milton Keynes, Oxford corridor, which will be the subject of significant investment. In order to compete effectively with and benefit from the Cambridge regional growth, this option is essential.
3. Growth Options 1-3 have been scored the same within the Interim Sustainability Appraisal and perform significantly better in sustainability terms than options 4 -6. Options 4-6 should be discounted as least sustainable. The provision of adequate infrastructure and services to support new housing is extremely difficult under dispersal options and the increased level of public opposition to numerous dispersed sites that may not be properly served by infrastructure and services should not be under-estimated. This is not to say that there should be no dispersal, however. Where smaller sites in towns and villages can bring community benefit or help the viability of existing services and facilities, this should be supported. We consider that option 3 provides the right level of dispersal without making this the focus of the growth strategy.
4. There are some similarities between option 2 (Transport corridors) and Option 3 (supporting the Cambridge to Norwich Hi-Tech corridor) as both are focused upon Transport routes. There are, however, significant advantages in choosing option 3 over option 2 as it would enable housing development and investment to be focussed in a core area that has the potential to generate significant employment in line with the Strategic Economic Plan objectives. This is a sustainable approach because it provides homes close to where the jobs will be created. This area also has the potential to benefit from funding sources through the LEP and Central Government to help deliver the Strategic Economic

Plan objectives for the High-Tech corridor. Putting more development in other transport corridors as proposed under option 2 would disperse development further, would be unlikely to benefit from the same funding streams and has less potential for job creation and contribution to the local economy. There is also a danger that locating housing on key transport corridors will only add to existing commuting into Norwich, where the majority of employment opportunities are located. A new settlement within the Hi-Tech corridor under option 3 can provide new homes close to new jobs and enable a planned approach towards infrastructure provision linking into various funding streams.

Option 1, (concentration close to Norwich) obviously scores well in sustainability terms but is very much a repeat of the existing Joint Core Strategy. There have been significant issues with delivery of the JCS numbers, particularly in certain areas and a repeat of this is not a desirable outcome. To accommodate the majority of the required housing numbers within an option 1 scenario would require significant additional pressure being placed upon Norwich Policy Area towns and villages, and the urban fringe, that are already experiencing high levels of growth under the JCS. As we suggest that there is in the region of 10,000-14,000 new homes required rather than the 7200 specified in the Growth Options Document, there is a need to find sites for significantly more homes than currently presented under this option. Although there may be scope to find some more suitable brownfield sites within Norwich, it is not considered that there is sufficient capacity under this option to accommodate all of the growth requirement without having an adverse impact upon the character of fringe settlements, as well as increased pressure on infrastructure and services.

The additional benefit of Option 3 is that as well as directing significant growth to a corridor, which includes its adjoining villages such as Morley St. Botolph, that can bring valuable benefits in terms of Hi-Tech job creation, the development of a new settlement based upon garden village principles will have less impact upon existing towns than too many bolt on urban extensions that do not always provide the required level of infrastructure and facilities.

5. We consider that the 10,000-14000 homes required would be best accommodated by growth Option 3 that provides for a new settlement in the right location to help deliver on economic growth objectives as well as providing a sustainable level of additional growth to Norwich, its fringe settlements and other main towns and villages.

**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. This is discussed in our background papers.

We consider that Option 3 which includes a new settlement in the Hi-Tech corridor provides infrastructure opportunities. By planning at scale, there is an opportunity to not only provide high quality housing, long term stewardship and land value capture, but also to understand the needs of the wider local area, which through a Development Corporation or local development agreement, can mean that the local authority is at the heart of the development process, providing leadership, but also reassurance around delivery. New settlements can ensure a range of local facilities and infrastructure, for example, this could lead to the provision of new and improved school provision, including a new High School which could serve the new settlement, Wymondham and the surrounding villages.

Planning at scale by way of new settlements enables long term funding streams to provide infrastructure needed for the occupants and the wider area. This can be linked with existing employment centres.

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

N/A to this representation.

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

It is Lanpro's submission that a programme of new settlements is the best way to help bring forward the objectives contained within the GNLP.

We have the strong view that new settlements should be at the heart of the strategic growth plan for the Greater Norwich area, linked to the Cambridge Norwich Tech Corridor and the wider Oxford Milton Keynes Cambridge corridor.

There is a fantastic opportunity for the delivery of great new places in the most sustainable manner, by a careful site selection process that looks at available land that is deliverable, with willing landowners and linked to existing employment areas, transport infrastructure in locations that minimise harm.

A series of new settlements has been part of the approach taken to secure the long term growth of Cambridge, which has seen this becoming a major national commercial hub and we believe that this will provide certainty to local authorities and developers. Furthermore, by supporting a new settlement at Hethel, it will protect existing towns from sprawling growth, which can be harmful



to their character and context and provide for economic benefits to the wider linked village network.

New settlements can be part of a long term plan where trajectories can be agreed and local authorities play a crucial role in ensuring that the development proceeds in line with a series of core values and principles, linked to good governance, long term stewardship and infrastructure funding.

Overall, we believe that this is the only approach to secure the certainty, level of investment and infrastructure needed to achieve the aims and aspirations of the Plan.

## 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?

N/A to this representation.

## Strategic City Centre Policy

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

N/A to this representation.

## City Centre Offices

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

N/A to this representation.

## Retailing

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

N/A to this representation.

## 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?

N/A to this representation.



<b>City Centre Housing</b>
19. What should the plan do to promote housing development in the city centre? N/A to this representation.
<b>Cultural, Visitor and Education Facilities</b>
20. How can the plan best support cultural, visitor and educational uses in the city centre? N/A to this representation.
<b>Remainder of the Norwich Urban Area and the Fringe Parishes</b>
21. Do you support Option UA1 for the remainder of the urban area and the fringe parishes? Yes
<b>Main Towns</b>
22. Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns? No
<b>Settlement Hierarchy</b>
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? Villages are correctly placed
25. Do you favour the Village Cluster approach in option SH2? No
25a. What criteria should be used to define clusters? N/A
25b. Which specific villages could form clusters? N/A
25c. How could growth be allocated between villages within a cluster? N/A
<b>The Influence of the Norwich Urban Area</b>
26. Do you support a Norwich centred policy area and, if so, why and on what boundaries? N/A to this representation.
<b>Section 6 – Topic Policies</b>
<b>The Economy</b>
<b>The Supply of Employment Land</b>
27. What option or options do you support? (refers to options on pg.71-2) N/A to this representation.

28. Which allocated or existing employment sites should be identified as strategic sites and protected? N/A to this representation.
29. Are there employment areas that should be identified as suitable for release for residential uses? N/A to this representation.
30. Are there any new employment sites that should be allocated? N/A to this representation.
<b>Accommodating Expenditure Growth</b>
31. Should the position of any of the centres in the retail hierarchy be changed? N/A to this representation.
32. Do any of the existing retail centres have scope to expand to accommodate further floorspace? N/A to this representation.
<b>The Rural Economy</b>
33. What measures could the GNLP introduce to boost the rural economy?  The GNLP should ensure that each village which is within easy access to major transport hubs/connections and currently has a level of services and facilities is provided with an opportunity to grow within the new local plan. The Government's aim to provide 20% of housing growth within smaller sites should be seen as the perfect opportunity to ensure that rural settlements have natural growth to support their services, facilities and community. The current JCS policies have stunted the natural growth of many sustainable and popular villages such as Morely St. Botolph.
<b>Access and Transportation</b>
<b>Strategic Transport Issues</b>
34. Are there any other specific strategic transport improvements the GNLP should support? N/A to this representation.
<b>Promoting Healthier Lifestyles, Sustainable Travel Choices and Greater Accessibility to Broadband</b>
35. Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area? N/A to this representation.

<b>Design Options</b>
<p>36. What approach do you support for promoting good design of new development?</p> <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 at this time. 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.</p> <p>We consider that a broad policy is more appropriate and that individual site allocation policies could set more prescriptive site specific requirements, backed up by Development Management Policies in each of the Districts and the City.</p>
<b>Housing</b>
<b>Minimum Affordable Housing Threshold</b>
<p>37. Which approach to affordable housing thresholds do you prefer?</p> <p>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.</p>
<b>Application of Affordable Housing Percentage Requirements on Sites</b>
<p>38. What approach do you favour for affordable housing percentages? (refers to options on pg.87)</p> <p>We favour a hybrid approach (an amalgamation of AH3 and AH5) that allows for a viability assessment of larger sites (such as the Hethel garden village) to arrive at a deliverable affordable housing figure and a fixed percentage in smaller traditional housing sites (where overall viability will be easier to predict) delivering more than 11 dwellings. This will maximise housing delivery whilst also encouraging the developers of larger sites where infrastructure, finance and phasing costs are higher to deliver.</p>
<b>Tenure Split for Affordable Housing</b>
<p>39. Do you support the favoured option for tenure split?</p> <p>N/A to this representation.</p>
<b>Rural Windfall, Exception Sites and Small Sites</b>
<p>40. Which approach do you think should be taken to rural windfall and exceptions sites? (refers to options on pg.89-90)</p> <p>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 adjacent, or close to, settlement</p>

boundaries. We consider that where such sites are permitted they could also provide for a proportion of self-build plots where there is an identified requirement in the location.

Given the sometimes 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.

## 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?

N/A to this representation.

## Houseboats

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

N/A to this representation.

## Gypsies and Travellers

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

N/A to this representation.

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

No.

## Travelling Showpeople

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

N/A to this representation.

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

No

## Residential Caravans/Park Homes

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

N/A to this representation.

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

No.

<b><i>Climate Change</i></b>
50. Do you support the favoured option for climate change policy? N/A to this representation.
<b><i>Air Quality</i></b>
How Should Air Quality be Covered in the GNLP?
51. Which approach do you favour for air quality? N/A to this representation.
<b><i>Flooding</i></b>
How Should Flooding and Flood Risk be Covered in the GNLP?
52. Do you support the favoured option for flood risk policy? Yes
<b><i>Nature Conservation, Green Infrastructure and Habitats Regulation Assessment Mitigation</i></b>
How Should Nature Conservation and Green Infrastructure be Covered in the GNLP?
<p>53. Which option do you support? (refers to options on pg.111)</p> <p>Lanpro supports a variation of option NC1 where specific housing, employment and new garden settlement sites are chosen to deliver large areas of strategic green infrastructure.</p> <p>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 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.</p> <p>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.</p> <p>The clear and obvious way forward on a strategic level 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.</p>

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

Smaller sites coming forward with an over provision in GI, such as the one detailed in this representation, can also provide habitat connections and extra recreational space for the new and existing residents. Although our proposed site cannot provide strategic scale GI it can provide a smaller part of the biodiversity jigsaw for the district and enhance community welfare. It should not be necessary for smaller sites to over deliver on GI but the policy should be worded to encourage it.

**Landscape**

**Landscape Character and Protection**

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

Lanpro understands the need to protect sensitive landscapes and river valleys but these landscapes are generally subject to existing other levels of protection. We also understand the need to prevent coalescence between existing settlements to protect townscape character and to enable resident populations to have direct access to countryside recreation and benefits.

Nevertheless, we object in the strongest possible terms to approaches outlined in options LA1 and LA2 especially the protection of the route of the NNDR that has no real landscape merit (one of the key reasons the route was selected and evidenced in the original submission documents) and is designed to facilitate access to new future planned growth areas.

Both approaches favour the blanket application of Green Belt-type constraint policies for no valid landscape and/or planning reasons when (due largely to a lack of brownfield land supply within the City) the outward expansion of Norwich into the fringe parishes is inevitable. Indeed, the current growth strategy for Norwich as contained in the adopted Joint Core Strategy acknowledges that the Norwich Policy area that is the countryside beyond the existing urban edge is the most sustainable location for new housing and employment growth.

Lanpro favours a new option that seeks to deliver a proper planning approach to development and one that allocates sufficient deliverable and viable housing and employment sites to meet real-time needs (including City Deal growth requirements) rather than the current strategy that seeks to underprovide for all the wrong reasons. This is the most appropriate way to take the development pressures off the higher value fringe parishes beyond the outer edge of the City.

**Strategic Gaps**

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

Lanpro does not agree that new Strategic Gaps are required within the Greater Norwich Local Plan area to separate existing settlements. This is because similarly worded countryside policies already acting as development constraints already exist and this kind of quasi-Green Belt-type policy is not required.

<b>Energy</b>
57. Should option EN1 be included in the GNLP? Yes
<b>Water</b>
58. Do you support option W1? Yes
<b>Communities</b>
Location of Affordable Housing within Sites
59. Do you support option COM1 for the distribution of affordable housing? Yes
Health Impact Assessments
60. Which option do you support? COM3.
Neighbourhood Planning
61. Do you support option NP1? If so, which GNLP policies should be “strategic”? N/A to this representation.
<b>Culture</b>
How Should Culture be Covered in the GNLP?
62. Which option do you support? N/A to this representation.
<b>The Broads</b>
63. Do you support option BR1? N/A to this representation.
<b>Section 7 – Monitoring the Plan</b>
Monitoring of the GNLP
64. Are there any current indicators that should be excluded or included in the GNLP monitoring framework?  The existing indicators on which the JCS is monitored are considered appropriate to carry forward. An additional indicator that could be included is the provision of self build plots and if they have been obtained by individuals or groups on the self build register, 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, 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?

No



## 5. Conclusions

### Housing Target

Lanpro have considered the various growth options put forward in the GNLP Reg 18 consultation paper. We have concluded that the housing target detailed to be used across each option is significantly lower than expected and we cannot support the target of 7,200 put forward.

The target is not based on credible methodology which has been through any form of adoption at Central or Local Government levels and the target put forward ignores the back log of undelivered homes against tested JCS figures. The target which has been detailed in the GNLP Reg 18 consultation puts the economic and social well being of the GNLP plan area at risk. To move forward with the current housing target would fail to meet with several of the sustainability objectives of the plan and without detailed methodology on how the figure has been arrived at the plan making process is at odds with the Strategic Environmental Assessment Regulations. To that regard it is also necessary to understand impacts, both positive and negative, of a credible range of housing targets before fixing a growth strategy.

It is Lanpro's opinion that the housing target should cover a range between 11,000 – 14,000 and that this range should be tested against the sustainability objectives of the plan. We consider that given the undelivered back log, the City Deal/Tech Corridor objectives, the long term GI deficit, affordable housing need and the requirement to significantly boost housing delivery the GNLP should be providing for a more ambitious house building programme through to 2036.

### Preferred Strategic Growth Option

Our preferred growth strategy is based on Option 3. We believe that it is correct to focus on a new settlement at Hethel based around the existing commercial activity on site and feeding into the tech corridor ambitions and influence of the CaMKox arc.

We strongly recommend that the housing figures are adjusted to reflect the points raised above and we would put forward the amendments to Growth Option detailed in our answer to Question 9.

### Morley

Morley is recommended to be upgraded from its JCS classification of 'other village' to 'service village' in the new GNLP.

This is entirely appropriate for a settlement which includes a primary school, village hall, playing fields, church and pub. It also incorporates Wymondham College, a secondary boarding and day school. The settlement is within easy reach of Wymondham and Attleborough by public transport allowing for access to regional and national travel services. The A11 is also with 2 miles of the proposed site. Had Morley not previously been considered to be outside of the Norwich Policy Area (NPA) it is highly conceivable that it would have experienced growth proposals over the past 5-10 years.

The evidence base for the GNLP is clear that the NPA defined in the JCS does not cover the geographical area that it should and that a wider area, which would include Morley, is clearly part of the Norwich Housing Market Area.

As such it is logical that a service village, such as Morley, should be considered for an appropriate amount of housing to maintain, and enhance, services and facilities in the immediate locality and support the wider rural economy. To this regard we would suggest that Morley should be allocated circa 30 dwellings to be provided over the plan period.

#### **Site Ref GNLP0356**

The site was submitted as part of the Call for Sites process and was given a high level assessment as part of the Housing and Economic Land Availability Assessment (HELAA).

The HELAA raised concern that the site was poorly related to the built up area of the village. However, the site immediately abuts garden ground on its northern boundary and is directly opposite two substantial detached dwellings. We do not consider that it is remote from village services and facilities, as has been demonstrated on the attached site context plan.

The Highway Authority also highlighted that there may be issues with gaining a suitable access onto the site. We have considered this matter and believe that a technically compliant access can be obtained onto Golf Links Road.

The site has the potential to offer a range of delivery options. It is our opinion that of the sites put forward to provide housing at Morley it presents the best opportunity to build out a small scale development of 0.5ha or to provide for the total housing allocation for the service village.

The larger the allocation the greater the benefits that can be provided to the village, the landowners have already confirmed that they would provide for a permanent footpath along the site boundary to replace the permissive path which they have created for children walking from the village to Wymondham College.

An allocation of circa 30 dwellings would allow for a greater contribution to be obtained for highway improvements and may facilitate the provision of a footpath/trod from the college to the village centre.

A larger allocation would also allow for affordable housing to be provided in a rural settlement which has not previously been able to deliver that type of benefit. The affordable housing could benefit a range of local people trying to find a route to home ownership, including key workers at the college.

The site is not within any designated landscape area and the existing boundary planting could be supplemented to mitigate against any potential negative impacts on wider views from the surrounding countryside. The site also has sufficient land area to provide for policy compliant levels of open space.

The landowners are local residents and would prefer to have an allocation of up to 30 dwellings as they can understand that this would provide for the greatest amount of benefits to the local community.

However, if the GNLP assessments/process determines that the housing allocation for the Morley area is to be distributed amongst sites then they are still prepared to take forward a smaller allocation within the plan period.

The site is under one ownership and is a deliverable, available and viable option for a housing allocation. There are no known constraints regarding ecology, flood risk, contamination or archaeology.

## 6. Next Steps

We would suggest that the GNLP housing target be revisited and a more realistic, justified and ambitious target be set that would ensure the social, economic and environmental wellbeing of the plan area is secured.

As part of this reconsideration we would put forward that Growth Option 3, with an increased housing target in the manner we have suggested, is the most logical and deliverable strategy.

As part of that strategy, service villages along the A11 corridor should be seen as vital to supply the range of housing types and opportunities which will support the ambitions to create a world class knowledge driven industry hub around the existing Hethel site.

As part of that strategy, and in accordance with the proposed service village status which Morley is to be given, a deliverable site which can provide significant benefits should be allocated to provide circa 30 dwellings.

It is requested that site ref GNLP0356 be allocated for up to 30 dwellings or alternatively to provide for a 0.5ha site to meet with the Central Government ambitions to provide 20% of the GNLP housing target being delivered on smaller sites.

However, based on the evidence available and the other sites put forward site GNLP0356 is considered to be the ideal placed to be the GNLP's preferred choice for the Morley area.



## **Appendix 1 Site Context Plan**





- Note
- SUMMARY
- Public House
  - Church
  - Recycling Facility
  - College
  - Primary school
  - Sports hall
  - Playing area
  - Existing employment
  - Wymondham business centre
  - 6 dwellings approved
  - Site Area

PROJECT TITLE  
Morley St Botolph

PROJECT NUMBER  
0623

CLIENT  
Nigel Hannant

DRAWING TITLE  
Site context

DRAWING NUMBER  
01

SCALE  
1:10000@A3

DATE  
JUNE 2016

DRAWN BY  
AT

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