

REPRESENTATIONS ON THE GREATER NORWICH DRAFT LOCAL PLAN REGULATION 18 CONSULTATION, JANUARY 2020

**ON BEHALF OF: PIGEON INVESTMENT MANAGEMENT LIMITED
LAND AT RIGHTUP LANE, WYMONDHAM**

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APPENDIX 1 – SITE LAYOUT

1. INTRODUCTION

- 1.1 Pegasus Group are instructed to submit the following representations to the Greater Norwich Draft Local Plan Reg 18 consultation (January 2020) for Pigeon Investment Management Ltd ('Pigeon') on behalf of R Mason ('the Landowner') in support of the allocation of Land at Rightup Lane, Wymondham.
- 1.2 The Land at Rightup Lane provides the opportunity for two small allocations providing a total of up to 27 homes including affordable housing on a site which Development Management officers have identified as being suitable for allocation.
- 1.3 The following representations address the Vision and Objectives, Policies 1, 2, 4, 5, 6, 7.1, 7.2 and 7.4 and the identification of sites for allocation within the emerging GNLP. An illustrative site layout plan is included as Appendix 1 to demonstrate that the Land at Rightup Lane can be sustainably delivered.

2. VISION AND OBJECTIVES

- 2.1 The Vision for Greater Norwich identifies that the GNLP will stimulate the creation of a strong, enterprising, productive and broad-based economy including through the provision of smaller scale employment sites within the market towns and villages to provide access to jobs for all. This accords with the economic objective of sustainable development which is to be welcomed. It will require that an appropriate distribution of jobs and homes is achieved through the plan.
- 2.2 The Vision aims to ensure that people of all ages will have good access to services and facilities including schools, health care, and community facilities which will reduce the need to travel. This accords with the economic, social and environmental objectives of sustainable development which is supported. It will require that housing which supports the needs of all age groups is delivered in locations which have good access to community facilities particularly with good access to sustainable transport connections.
- 2.3 The Vision seeks to ensure that a range of types, tenures and sizes of homes will have been built to respond to the needs of the area, including those of the older population and those in affordable need. Again, this accords with the social objective of sustainable development and is supported.
- 2.4 The Vision then indicates that the need to travel will have reduced including through a better alignment of the distribution of homes and facilities, an increase in home working, as well as an increase in the use of sustainable modes of transport. This will require that new housing is provided at locations where there is a shortage of workers and/or that housing is provided in locations with sustainable transport connections to major employment hubs.
- 2.5 The Vision also identifies that educational and healthcare facilities will have been expanded or new facilities provided which again accords with the social objective of sustainable development and is to be welcomed.

3. POLICY 1 – THE SUSTAINABLE GROWTH STRATEGY

- 3.1 Policy 1 sets out the proposed strategy and includes the proposed housing requirement, the proposed employment land requirement, the approach to five-year land supply and the spatial strategy. These are addressed below.
- 3.2 Policy 1 also sets out the approach to supporting infrastructure and the proposed distribution of development which are addressed in greater detail in Policies 4 and 7.1 to 7.4 respectively. These matters are responded to under those Policies rather than in response to Policy 1.

Housing Requirement

The minimum housing need

- 3.3 The foreword to the Draft Local Plan identifies a requirement for about 44,500 homes over the next 20-years. This is clarified in Policy 1 which identifies a housing requirement for 44,340 homes in response to a need for 40,550.
- 3.4 The need for 40,550 homes is identified as having been calculated using the standard method according to Table 6 and the box at the bottom of page 53.
- 3.5 The standard method provides the minimum local housing need according to the PPG (2a-004) and is calculated using the average household growth for 10 consecutive years, with an affordability uplift based on the median workplace-based house price to earnings ratio of the preceding year¹.
- 3.6 The Draft Local Plan covers the period from 1st April 2018. In order to establish the minimum local housing need for the plan period it is therefore necessary to calculate either the standard method at 2018; or to calculate the current standard method and apply this to the remainder of the plan period in addition to the number of completions which have already occurred.
- 3.7 In the case of the Greater Norwich Plan Area, the average household growth over the 10 consecutive years from 2018, namely 2018-28, was 400 in Broadland, 510 in Norwich and 704 in South Norfolk. The median workplace-based house price to earnings ratios in 2017 were 9.82, 6.93 and 8.91

¹ As confirmed in paragraph 15 of the Housing Delivery Test Measurement Rule Book

- respectively. Using these figures, the minimum local housing need over the plan period equates to 41,379 homes.
- 3.8 Alternatively, the minimum local housing need from 2019 onwards can be calculated using the average household growth over the 10 consecutive years from 2019, namely 2019-29, with the affordability ratios of 2018 applied. The average household growth was 397, 505 and 691 respectively and the median workplace-based house price to earnings ratios were 9.23, 7.03 and 8.78 respectively. These figures produce a minimum local housing need of 2,024 homes per annum which equates to 38,460 homes over the period 2019-38. The number of housing completions in 2018/19 need to be added to this figure to provide the minimum local housing need over the plan period. MHCLG Live Tables identify that there were 2,757 housing completions, as well as 260 student bedspaces and 91 other bedspaces completed in this year. Once the appropriate conversion factors as identified in the PPG (68-034) and the PPG (63-016a) are applied this would equate to 2,901 houses² completed in 2018/19. In addition to the minimum local housing need of 38,460 over the period 2019-38 this would produce a minimum local housing need for 41,361 homes over the plan period.
- 3.9 Once the median house price to earnings ratio for 2019 and the number of housing and bedspace completions in 2019/20 are available, it will be possible to provide yet another calculation of the minimum local housing need based on the completions in the period 2018-20 and the minimum local housing need over the period 2020-38. However, given the consistency of the preceding figures it would be expected that this would again be broadly consistent.
- 3.10 In either case, it is apparent that the standard method has been miscalculated within the Draft Local Plan as it is below the minimum local housing need of either **41,379** or **41,361**. Policy 1 and all other references to a need for 40,550 are therefore not justified nor are they consistent with national policy.

² Calculated using the average number of students per household of 2.85 in Norwich and applying this to the 260 student bedspaces which equates to 91 houses; and using the average number of adults per household of 1.85 in Broadland and applying this to the 8 older persons bedspaces which equates to 4 houses; and using the average number of adults per household of 1.72 in Norwich and applying this to be 83 older persons bedspaces which equates to 48 houses.

- 3.11 Furthermore, the Government has identified that it intends to review the standard method by September 2020. As the Local Plan is not intended to be submitted for examination until June 2021, it is likely that the Local Plan will need to respond to the new standard method, whatever that may be.

Exceeding the minimum housing need

- 3.12 The standard method also only provides the minimum local housing need, and the PPG (2a-010) identifies that this should be exceeded including in situations where there is a growth strategy or where strategic infrastructure improvements may drive an increase in housing need or where previous assessments of need are significantly greater than the standard method. All three of these situations arise in Greater Norwich.

The City Deal

- 3.13 Paragraph 13 of the Draft Local Plan identifies that the Greater Norwich City Deal requirements will be met through the Draft Local Plan. As the Greater Norwich City Deal forms a growth strategy which has been agreed with Government, the Local Plan is required to meet the requirements of the City Deal as this forms part of national policy as set out in paragraph 6 of the NPPF.
- 3.14 The City Deal identifies that strategic infrastructure is needed including to deliver a step change in housing delivery. It sets a target for an average of 3,000 homes per annum in the period 2014-19 and for 37,000 homes to be delivered in the period 2008-26.
- 3.15 MHCLG Live Tables identify that only 10,715 houses were built in the period 2014-19 in addition to the equivalent of 581 homes provided as student and older persons bedspaces. This provides a total of 11,296 or an average of only 2,259 homes per annum. It is therefore apparent that the short-term target of the City Deal has not been met and that accordingly this shortfall of 3,704 homes should be addressed as soon as possible to achieve the objectives of the City Deal. No such short-term uplift to remedy this shortfall is made within the Draft Local Plan contrary to the requirements of national policy in the form of the City Deal.
- 3.16 In the period 2008-19, the MHCLG Live Tables identify an equivalent of 19,416 housing completions, which means that in order to provide 37,000 homes in the period 2008-26 it will be necessary to deliver the remaining 17,584 in the period

2019-26 or an average of 2,512 per annum. However, the housing need identified in emerging Policy 1 of 40,550 homes 1 only provides for an average need of 2,028 homes per annum. The housing need of the Draft Local Plan therefore again does not provide a sufficient number of homes to meet the housing needs identified in the City Deal.

- 3.17 It is therefore evident that the Draft Local Plan does not meet any of the targets of the City Deal and that it is accordingly not effective, not justified, not positively prepared and inconsistent with national policy.

Previous assessments of need

- 3.18 The SHMA for Central Norfolk identifies that there was a need to deliver 44,714 homes from 2015-36 to accord with the City Deal. In the period 2015-18, the equivalent of 6,680 homes were delivered and so there is a residual need for 38,034 homes from 2018-36, or 2,113 per annum.

- 3.19 Assuming that this need remained constant across the period 2036-38, there would be a need for 42,260 homes to accord with the City Deal based on the latest assessment of housing need. The Local Plan does not therefore provide a sufficient number of homes to meet the latest assessment of need or to accord with the City Deal.

The housing need of students

- 3.20 The standard method is informed by the 2014-based household projections which assume that the five-year migration trends which were experienced in the period 2009-14 will be maintained. The Higher Education Statistics Authority (HESA) identified that University of East Anglia (UEA) had 16,640 students and the Norwich University of the Arts had 1,485 students in 2009 providing a total of 18,125, but that this had increased to 18,140 by 2014 with 16,265 at UEA and 1,875 at the University of Arts. The 2014-based projections which inform the standard method therefore assumes that the student population will increase by 15 people over five years or 3 per annum.

- 3.21 Paragraph 45 of the Draft Local Plan however indicates that the Universities in Norwich are expected to expand. In particular, the University of East Anglia (UEA) has announced plans to increase its students from 15,000 to 18,000 in the next decade, an increase of 300 students per annum.

- 3.22 The increased migration of 297 students per annum³, even assuming that the student population of the University of the Arts remains constant, are not taken into account in the projections.
- 3.23 These additional students at UEA will clearly have an impact on the housing need in Greater Norwich which is not taken into account within the standard method. Either these will generate a need for an additional 2,970 bedspaces which is equivalent to 1,042 houses or if these students are accommodated in the housing stock it will be necessary to deliver an additional 1,042 homes to accommodate them. It will be necessary to deliver such accommodation to meet the objectively assessed needs and to accord with the Vision of the GNLP.
- 3.24 Once the needs of these additional students are taken into account this would increase the minimum local housing need from either 41,379 or 41,361 to either **42,421** or **42,403** homes over the plan period. This broadly accords with the 42,260 homes necessary to accord with the City Deal.

The needs of those in institutional accommodation

- 3.25 The SHMA for Central Norfolk identifies a need for 3,909 people aged 75 or over to be accommodated in residential institutions over the period 2015-36. The 2014 based institutional population projections identify an increase of 2,060 such people within the GNLP area over the period 2015-38 comprising 1,088 in Broadland, 291 in Norwich and 681 in South Norfolk.
- 3.26 In the period 2015-18, a total of 234 bedspaces in older persons communal establishments were built, including 7 in Broadland, 225 in Norwich and 2 in South Norfolk. This leaves a residual need for 1,826 bedspaces in the period 2018-36, comprising 1,081 in Broadland, 57 in Norwich and 679 in South Norfolk.
- 3.27 The household projections which inform both the SHMA and the standard method do not include this population and the SHMA correctly recognises that in the absence of 1,826 bedspaces in communal establishments the population who would have occupied these will remain in the dwelling stock rather than releasing them as assumed in the projections.

³ = 300 students per annum identified in paragraph 3.21 – 3 students per annum identified in paragraph 3.20.

- 3.28 It is therefore apparent that there is a need for 1,826 bedspaces in communal establishments in addition to the standard method and that in the absence of such provision the housing requirement will need to increase as fewer dwellings will be released to the market. The number of dwellings that would not be released in the absence of such residential institutions is 987 using the calculation identified in the PPG (63-016a) comprising 584 in Broadland, 33 in Norwich and 369 in South Norfolk.
- 3.29 It will therefore either be necessary to make provision for the 1,826 bedspaces or increase the housing requirement by 987 homes to meet the objectively assessed needs within the GNLP and to accord with the Vision of the GNLP. This would result in a need for either 43,408 or 43,390 homes or to 42,421 or 42,403 homes and 1,826 bedspaces.

The housing requirement

- 3.30 The Delivery Statement on page 37 indicates that the Draft Local Plan provides a sufficient supply of housing sites to exceed the identified housing need of 40,550 homes by 9%. However, as identified above, there is actually a need for at least 42,400 homes to accord with the City Deal, meet the minimum local housing need and to accommodate the growth plans of UEA as well as a need for an additional 1,800 bedspaces in communal establishments.
- 3.31 In order to provide sufficient flexibility to ensure that these minimum needs will be delivered, taking account of the non-delivery of sites, it has been found by numerous Inspectors that it is appropriate to set the housing requirement above the minimum housing need⁴ as the Draft Local Plan seeks to do.
- 3.32 In Greater Norwich, the housing trajectory of the Joint Core Strategy identified that there would be 23,637 housing completions in the period 2008-19. However, only 18,835 homes have been delivered which demonstrates that at least historically, the trajectory of Greater Norwich overestimates the developable supply by circa **25%**. Assuming that the current trajectory is equally as accurate, it would be appropriate to set a housing requirement 25% in excess of the minimum need for circa 42,400 homes. This would produce a housing requirement for circa **53,000 homes**. This is illustrative that there is a need for a significant contingency allowance in Greater Norwich to ensure that

⁴ Including in Aylesbury Vale and Gloucester, Cheltenham and Tewkesbury

needs are actually met. It is therefore recommended that the proposed contingency of 9% is retained as a minimum but this should be significantly greater, which in addition to the minimum housing need for circa 42,400 homes produce a housing requirement for at least 46,216 homes.

Contingency to respond to changes

- 3.33 The Government has identified an intention to review the standard method in September 2020 and this will be required to be responded to in the Greater Norwich Local Plan to meet the minimum local housing needs at the point of submission as required by the PPG (2a-008). This proposed review of the standard method means that the minimum housing needs may change from the 42,400 identified above. It may be that the minimum housing needs increase significantly and accordingly a sufficient developable supply (including the required contingency set out above) should be planned for to ensure that the emerging GNLP will be able to respond to the identified minimum needs at the point of submission as required by the PPG (2a-008).
- 3.34 Whilst it is not possible to identify the need which will arise from this review at present, it is considered that a sufficient developable supply (including the required contingency set out above) should be planned for to significantly exceed the identified need for at least 42,400 homes and provide confidence that the minimum needs arising from the review will be able to be accommodated.

Employment Land Requirement

- 3.35 As set out in the GNLP, there is no quantitative need for additional employment sites. Nevertheless, the GNLP allocates an additional 40ha providing a total of 360ha of employment land allocations to meet the underlying demand and provide choice to the market.
- 3.36 Whilst these allocations will assist the economic growth of the area and represent positive planning, if a significant proportion of these are actually developed and occupied, they will be dependent upon greater numbers of in-commuters from outside of the plan area. Accordingly, an appropriate monitoring framework should be put in place to ensure that a sufficient number of homes are provided to accommodate the workforce to avoid the resultant

environmental harms of a greater dependency on long-distance commuting flows.

- 3.37 If the monitoring framework indicates that a greater number of jobs have been accommodated than the growth in the resident workforce such that the economy of the area becomes more dependent upon unsustainable long-distance in-commuting flows, this should trigger an immediate review of the GNLP alongside a policy response with residential planning applications being considered more favourably until such time as the GNLP review is adopted to address the imbalance.

The approach to five-year land supply

- 3.38 Policy 1 proposes that the five-year land supply will be assessed across the plan area and that enough allocations are provided to demonstrate a five-year land supply at adoption. However, there is no evidence that this is the case as the GNLP is not supported by a housing trajectory contrary to paragraph 73 of the NPPF. Pegasus Group reserve the right to respond on this matter when the necessary evidence is made available.

Spatial Strategy

- 3.39 The Table at Policy 1 details the distribution of housing supply across the settlement hierarchy, including proposed new allocations as follows;
- Norwich urban area - 30,560 dwellings – approximately 70% of supply
 - Main towns – 6,342 dwellings – approximately 14% of supply
 - Key Service Centres – 3,417 dwellings – approximately 8% of supply
 - Village clusters – 4,024 dwellings – approximately 9% of supply
- 3.40 Policies 7.1 to 7.5 provide further detail on the distribution of sites and the composition of existing and proposed allocations with regard to their size and brown or green field status.
- 3.41 Our clients raise concern over the proposed spatial strategy of the emerging GNLP owing to its over reliance on housing delivery in the Norwich urban area and the proposed discrepancy in terms of settlement hierarchy between the

- quantum of housing allocated to Main Towns, Key Service Centres and Village Clusters.
- 3.42 While the Norwich urban area is a sustainable location for growth, reliance on this area for the delivery of approximately 70% of the housing growth of the GNLP up to 2038 places a requirement on existing infrastructure to accommodate an additional 30,560 dwellings in the plan period, it also requires an annual delivery rate within the area of 1,698 dwellings per annum over each of the next 18 years. This requires that the level of development in Norwich urban area alone is broadly consistent with that which has been achieved across the entire GNLP plan area since 2008. This does not appear to be realistic. If the necessary boost to housing supply is to be achieved this will require a greater range and choice of sites across all of the sustainable settlements within the plan area.
- 3.43 Moreover, reference to Policy 7.1 demonstrates that delivery within the Norwich Urban Area is predicated on two substantial brownfield regeneration areas, the Northern City Regeneration Area and the East Norwich Strategic Regeneration Area and several urban extensions of over 1,000 dwellings each.
- 3.44 Brownfield regeneration is costly and time consuming and often involves the bringing together of multiple delivery partners to achieve. The likelihood of the totality of development proposed through regeneration delivering in the plan period is therefore slim.
- 3.45 New strategic urban extensions can also be timely to deliver with the need for new strategic infrastructure in terms of highways and drainage to be delivered in advance of new homes.
- 3.46 The Councils have not produced evidence to substantiate the delivery trajectory of the brownfield regeneration sites or the urban extensions in the Norwich Urban Area. We reserve the right to comment further on this matter at the Regulation 19 consultation stage. Delay in delivery at either source of supply could prejudice the delivery of the housing requirement of the GNLP and therefore go to the soundness of the plan.
- 3.47 Additional certainty over the delivery of the housing requirement could be achieved by changing the emphasis of the spatial strategy by allocating more housing to the Main Towns, including Wymondham, and the Key Service Centres

- with an associated reduction in the percentage to be delivered in Norwich urban area and the Village Clusters.
- 3.48 Additionally, we have concerns over the fact that more dwellings are proposed in the spatial strategy across Village Clusters than are allocated at Key Service Centres, including a minimum of 1,200 dwellings through a South Norfolk Village Clusters Housing Site Allocations Development Plan Document.
- 3.49 Without certainty over the supply of land to deliver such a quantum of development in South Norfolk Village Clusters the soundness of the spatial strategy is questionable. As a percentage of the overall new housing allocations in the Reg 18 GNLP the current spatial strategy delegates approximately 15% to a document outside of its control (1200/7,840). This is not considered to be a reasonable approach and prejudices the delivery of the emerging GNLP by 2038.
- 3.50 A Settlement Hierarchy approach to the distribution of development would look to allocate a higher percentage of housing to more sustainable locations with smaller amounts being allocated to lower order settlements in recognition that small developments at villages can help maintain service provision, provide vitality and help address local market and affordable housing needs.
- 3.51 In failing to provide an increased number of dwellings at Main Towns and Key Service Centres the Councils are also missing the opportunities presented by Pigeon to provide new community facilities that can support existing and proposed new development in sustainable locations for the plan period and beyond.
- 3.52 The preceding representations on the Spatial Strategy are all set in the context that the identified housing need does not even accord with the minimum set by national policy and does not take account of the needs of specific groups. It is therefore evident that the quantitative elements of the Spatial Strategy will need to be revised to ensure that housing needs can be met across the GNLP area. This should be achieved through directing more growth to the Main Towns and Key Service Centres to counterbalance the disproportionate levels of growth proposed within the Norwich urban area and Village Clusters.

Small and Medium sized sites

- 3.53 Paragraph 68a of the NPPF requires that at least 10% of the housing requirement should be provided on small and medium sites of no larger than 1ha. This requires that 4,434 homes of the identified housing requirement for 44,340 homes is provided on such sites. However, as identified previously, the proposed housing requirement is insufficient to ensure that the actual housing needs will be met. It will therefore be necessary to increase the number of homes provided on small and medium sites accordingly.
- 3.54 In paragraph 164 (6), the GNLP indicates that 12% of homes allocated are on small and medium sites. However, 12% of allocations does not equate to 12% of the housing requirement as required by the NPPF. It is therefore likely that it will be necessary to identify additional small or medium allocations to accord with national policy.
- 3.55 The Land at Rightup Lane, Wymondham has a developable area of 1ha which will be developed in two phases. Through discussions with the local highway authority it has been identified that only the first 8 dwellings can be delivered in the first phase owing to the current access arrangements. The area of this parcel would be significantly less than 1ha. The remaining dwellings on a site significantly below 1ha would then be delivered potentially through a different access point provided through Phases 3 and 4 of a neighbouring development. The Land at Rightup Lane therefore may operate as two independent sites with different access arrangements, such that these should be considered as two separate small rather than medium allocations.
- 3.56 It has also been identified by Development Management officers in the Site Assessment Booklet that the Land at Rightup Lane is suitable for allocation subject to highways constraints being addressed, such that this would provide an appropriate site for allocation to address the existing shortfall in small or medium sized sites.

4. POLICY 2 – SUSTAINABLE COMMUNITIES

4.1 While we broadly support the overall aims and objectives of the GNLP to facilitate the growth and delivery of sustainable communities the following representations are made in response to Policy 2 and its associated reasoned justification.

Criteria 3

4.2 This Criteria requires new development to;

"Contribute to multi-functional green infrastructure links, including through landscaping, to make best use of site characteristics and integrate into the surroundings;"

4.3 This is supported as it provides for the environmental objective of sustainable development. Pigeon's proposals at Wymondham will incorporate a landscaped buffer to the eastern boundary which will enhance the Green Infrastructure Corridor identified in the Wymondham Area Action Plan.

Criteria 4

4.4 This Criteria requires new development to;

"Make efficient use of land with densities dependent on site characteristics, with higher densities and car free housing in the most sustainably accessible locations in Norwich. Indicative minimum densities are 25 dwellings per hectare across the plan area and 40 in Norwich."

4.5 The density of residential development at any site is dependent on other community infrastructure or site-specific requirements that may arise as a result of emerging GNLP planning policy. It may transpire that a site promoted to the plan can provide educational or health facilities in association with residential development. The need for highway infrastructure and sustainable drainage features to be provided at a site also should be taken into consideration. To that end the policy should be amended to state that;

"...the indicative minimum net density of the residential element of a site allocation should be 25 dwellings per hectare."

- 4.6 The Policy identifies that these minimum density standards are indicative. This is supported as it allows for flexibility to ensure that each parcel of land is used effectively, taking account of the type of development proposed, the site context and appropriate design characteristics.

Criteria 10

- 4.7 This Criteria contains the following bullet point;
- “All new development will provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016);”*
- 4.8 The Planning Practice Guidance states that;
- “The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building’s sustainability to do so in a way consistent with the government’s zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability.”* PPG Climate Change – Paragraph: 009 Reference ID: 6-009-20150327 Last revised 27th March 2015
- 4.9 PPG Paragraph: 012 Reference ID: 6-012-20190315, last revised 15th March 2019, states that Local Plans can set energy efficiency standards that exceed the energy efficiency requirements of the Building Regs, it also states that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the code for Sustainable Homes – which is identified as approximately 20% above current Building Regs across the build mix. The PPG also requires such policy requirements to be viable.
- 4.10 The Code for Sustainable Homes was withdrawn in 2015 and replaced by technical housing standards. The GNLP Reg 18 has chosen to continue to pursue the ‘20% above Building Regs’ approach at criteria 10 of Policy 2.
- 4.11 The Alternative approaches section states that this target is a ‘challenging but achievable requirement’ and that to go beyond 20% would be unviable.

- 4.12 What is not clear however is the Councils' evidence to require energy savings of 'at least 20%' above Building Regs when the PPG states 'approximately 20% across the build mix'.
- 4.13 It is not clear either whether this policy requirement has been appraised across a range of site typologies in the viability appraisal and whether it has been tested in conjunction with the other policy requirements of the plan, including those of emerging Policy H5 which seeks:
- i. 33% affordable housing, (except in Norwich City Centre);
 - ii. all new housing development to meet the Governments Nationally Described Space Standards; and
 - iii. 20% of major housing developments to provide 'at least 20% of homes to the Building Regulation M4(2)(1) standard or any successor'.
- 4.14 Whilst the objectives behind these are supported, taken together these emerging policy requirements of the plan could prejudice the delivery of some sites within the emerging plan.

Master planning

- 4.15 Community engagement prior to submitting an application is supported. However, Policy 2 identifies master planning using a recognised community engagement process for schemes of more than 200 dwellings will be encouraged. It is not clear what is meant by such a master planning process and clarity would be welcomed.
- 4.16 It is considered likely that such a master planning process would exceed the requirements of each of the joint authorities existing adopted Statements of Community Involvement and also goes beyond the requirements of paragraphs 39 to 41 of the NPPF and the PPG (20-010).
- 4.17 Furthermore, there is no guarantee that the masterplan outcomes of such a community engagement process will be considered appropriate or acceptable by the local authority as there is no mechanism for validating the outcomes of the process pre-submission. This could result in difficulties for all parties at the application stage should masterplan amendments be required as a result of statutory and internal local authority consultations post submission.

5. POLICY 5 – HOMES

5.1 Policy 5 identifies that proposals should address the need for homes for all sectors of the community having regard to the latest evidence which is to be supported.

Space Standards

5.2 The Policy requires all housing development to meet the Government's Nationally Described Space Standard for internal space (NDSS)⁵.

5.3 NDSS are not currently a mandatory requirement of Building Regulations and therefore should a Council wish to introduce them they are required to accord with the tests of NPPF 2019 paragraph 127f and Footnote 46 which requires the use of the NDSS to be 'justified'.

5.4 The Councils also need to demonstrate that the costs associated with implementing the NDSS have been subject to whole plan viability appraisal as required by planning practice guidance⁶.

5.5 The Council's NDSS Study (August 2019) is attached at Appendix B of the Interim Viability Appraisal (2019). The Councils have not identified harm that may be arising to residents as a result of dwellings not being built to the NDSS. Nor is there any evidence that houses not built to the NDSS are not selling as well as those that are, or that such homes are considered inappropriate by purchasers.

5.6 If the Government considered it appropriate to make the NDSS mandatory, as proposed by draft Policy 5, then this could quickly and easily be introduced through Building Regulation legislation rather than through the Development Plan process.

5.7 Introducing the NDSS in the GNLP will have an impact on the cost of construction of dwellings and therefore on their affordability to consumers, as well as on the density of development that can be achieved at development sites, thereby

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf

⁶ NPPG Housing Optional Space Standards: Paragraph: 003 Reference ID: 56-003-20150327 Revision date: 27 03 2015.

affecting the efficient use of land. It will also have a knock-on effect on the viability of the GNLP which may translate into impact on the deliverability of dwellings and therefore on the delivery of the emerging plan.

Accessible and Specialist Housing

- 5.8 The Policy then proceeds to support the delivery of accessible and specialist housing providing they have good access to local services which is welcomed.
- 5.9 However, as identified in response to Policy 1 there is a need for 1,826 bedspaces in residential institutions for older people across the plan area which would be best addressed, at least in part, through the identification of specific allocations to meet this need. In the absence of such allocations, the GNLP cannot demonstrate and more importantly may not meet the objectively assessed needs of this population contrary to paragraphs 35a and 61 of the NPPF.
- 5.10 There is a need for 1,081 bedspaces in Broadland, 57 in Norwich and 679 in South Norfolk over the plan period. In 2018/19, 8 were built in Broadland leaving a residual need for 1,072 and 83 were built in Norwich meaning that there is no residual need in this LPA. In order to ensure that these needs are addressed it would therefore be appropriate to allocate sites in both Broadland and South Norfolk to meet these needs.
- 5.11 In addition to the need for residential institutions (including care homes and nursing homes) there will also be a need for independent living units including those which offer communal facilities and/or a level of care (such as sheltered housing or extra care) to accommodate older households.
- 5.12 Norfolk County Council has assessed the need for such accommodation in Living Well, July 2018 and identify a need for 3,376 such homes in Broadland, 122 in Norwich and 3,257 in South Norfolk. Owing to the scale of this need, it would again be appropriate to identify specific allocations to ensure that the needs of communities are addressed.
- 5.13 Any such allocations for residential institutions or independent living units should be primarily within Broadland and South Norfolk where the need arises on sites which have good access to local facilities and to public transport infrastructure.
- 5.14 The Policy requires proposals for major housing development to provide;

"..at least 20% of homes to the Building Regulation M4(2)(1) standard or any successor."

- 5.15 This implies that any development of 10 or more dwellings will need to provide upwards of two dwellings that meet the accessibility standard to enable people to stay in their homes longer, however there is no evidence provided that such a high percentage of adaptable dwellings will be required over the life time of the plan. While it is long recognised that many affordable homes are built to such a standard, this is an additional policy requirement that developers are being requested to meet which will have a knock on impact on the cost of new homes and therefore their accessibility in terms of cost to those seeking to enter the housing market.
- 5.16 It is considered that the requirement for the delivery of adaptable and specialist accommodation should be specific to individual allocations which will ensure that the needs can be met across the GNLP area and that these will be met at appropriate locations in close proximity to services and facilities.

6. POLICIES 7.1-7.5 – THE SPATIAL STRATEGY

Policy 7.1 – Norwich Urban Area including the Fringe Parishes

- 6.1 Policy 7.1 details existing commitments and proposed allocations for the City Centre, East Norwich and elsewhere in the urban area including fringe parishes for housing and employment purposes. It also provides policies for retail, main town centre uses and leisure development.
- 6.2 A total of 30,560 new homes are proposed in the Norwich urban area for the plan period up to 2038, of which 26,165 homes (approximately 86%) are stated as comprising existing commitments. As currently proposed the Norwich urban area will provide 68.9% (approximately 70%) of housing land supply for the GNLP.
- 6.3 Closer examination of this source of supply demonstrates a reliance on brownfield regeneration sites and large urban extensions. These sources of supply are explored further below.
- 6.4 The Northern City Centre strategic regeneration area is dependent on the delivery of Anglia Square, a high density housing-led mixed-use redevelopment which was ‘called-in’ by the Secretary of State for the purpose of decision making on 21st March 2019 and is the subject of a public inquiry which commenced on 28th January 2020⁷. The appeal Inspector will make recommendations to the Secretary of State however the site should not be relied upon for the delivery of a large quantum of homes until the Secretary of State allows the appeal. To that end the emerging GNLP should not place an over reliance on the allocation and should look to other sources of supply to meet its housing requirements.
- 6.5 The East Norwich area is also identified as a strategic regeneration area on the GNLP Key Diagram with named brownfield sites including;
- Yare at Carrow Works
 - the Deal Ground
 - the Utilities Site

⁷ https://www.norwich.gov.uk/info/20017/planning_applications/2491/anglia_square_planning_application_-_public_inquiry

- land in front of ATB Laurence Scott

- 6.6 It is of particular note that outline planning permission was granted at the Deal Ground in 2013 but no applications for the approval of reserved matters or for the discharge of conditions have since been submitted in the subsequent 7 years. This is indicative of the length of time that it can take to resolve issues on large brownfield sites prior to delivery.
- 6.7 The GNLP area is stated as having the long-term potential to deliver a new urban quarter and no certainty is provided that the named sites can deliver in the plan period up to 2038. Indeed, a master planned approach through a Supplementary Planning Document is proposed to co-ordinate the delivery of the area, including a local energy network and sustainable transport options.
- 6.8 The GNLP is therefore correct to suggest that East Norwich represents a long term growth option as the brownfield regeneration of historic industrial and former manufacturing areas takes many years of concerted effort, often with the intervention of the public sector to address funding gaps owing to constraints such as contamination, heritage and flood risk.
- 6.9 Much of the East Norwich Strategic Growth Area is located adjacent to existing water course including the Rivers Wensum and Yare therefore flood risk will represent an issue with regard to delivery.
- 6.10 Moreover the Reg 18 document highlights the uncertainty over the Britvic/Unilever Carrow Works site, this is the largest regeneration site shown in the Key Diagram (Map 9) for the east Norwich Strategic Growth Area, therefore assumptions made over the quantum of housing to be delivered from this brownfield source should be questioned until there is further clarity over the availability of the site. To that end the emerging GNLP should not place an over reliance on the new East Norwich allocation (1,200 homes) and should look to other sources of supply to meet its housing requirements.
- 6.11 Policy 7.1 also places emphasis on the delivery of large urban extensions (sites of over 1,000 dwellings) 20,765 of which are stated as being existing commitments and 2,815 of which are proposed as new allocations. Indeed, the proposed capacity from 'elsewhere within the Norwich urban area' represents 78% of the housing supply in the total Norwich Urban Area.

- 6.12 Urban extensions often require the delivery of substantial highway and drainage infrastructure before the delivery of new homes can commence. The delivery of 19,944 new homes on urban extensions appears overly optimistic. This is especially the case given the previous over-optimism which is evident in the trajectories within the GNLP area which have overestimated supply by circa 25%. It is also considered to be over-optimistic given that this includes 3,000 homes on a single site at North Rackheath which is not expected to achieve its first completion until 2024/25 according to the Annual Monitoring Report leaving only 14 years of the plan period to deliver at an average rate of 214 dwellings per annum which has been achieved on very few sites nationally.
- 6.13 The last paragraph of Policy 7.1 states that a large contingency site has been identified at Costessey to be bought forward if delivery of housing in the GNLP does not meet local plan targets. Such an approach is not considered to be reasonable given the existing over reliance on large strategic sites in the Norwich Urban Area to deliver homes in the plan period.
- 6.14 To conclude, the over reliance on the Norwich Urban Area to deliver 30,560 new homes in the plan period is considered to be an overly optimistic strategy given the reliance on large brownfield regeneration sites that are as yet unconsented plus a heavy associated reliance on large urban extensions, plus the growth triangle, to deliver the quantum of homes proposed in the GNLP by 2038.
- 6.15 An alternative strategy proposed by Pigeon, which seeks a greater percentage of development allocated to smaller, eminently deliverable sites at Main Towns and Key Service Centres, will not only help provide certainty to the delivery of the plan but provide for sustainable growth at locations with services and facilities, will assist the GNLP in evidencing a five-year housing land supply, provide a range and choice of sites to support delivery, and will provide new community facilities including land for education and healthcare purposes.
- 6.16 Our client reserves the right to comment further at Regulation 19 once housing trajectories are published, on the deliverability of sites and the associated soundness of the plan.

Policy 7.2 - Main Towns

- 6.17 Policy 7.2 sets out the level of growth to be delivered in the plan period for the Main Towns of Aylsham, Diss, Harleston, Long Stratton and Wymondham.

Collectively these towns will provide 6,342 homes, approximately 14% of housing growth for the plan period.

6.18 Paragraph 308 of the GNLP states that these towns play *'a vital role on the rural economy'* as they *'provide employment opportunities and services for rural hinterlands'*. It goes on to say that the settlements are *'the engines of rural growth'*.

6.19 Accordingly, it is necessary to make appropriate provision at these highly sustainable settlements to ensure that the rural economy is supported and that local housing needs are addressed including at Wymondham.

Policy 7.4 – Village Clusters

6.20 The GNLP proposes a disproportionately high level of growth at the Village Clusters, a significant proportion of which are on as yet unknown sites to be identified in the South Norfolk Village Clusters Housing Site Allocations Plan.

6.21 Village Clusters are by definition less sustainable locations for growth and accordingly it would be expected that development would be restricted to that necessary to support rural or local needs. However, the GNLP seeks to direct more development to such settlements than to Key Service Centres which have a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas according to paragraph 333 of the GNLP. Similarly, paragraph 308 identifies that the Main Towns serve the wider hinterlands including these Village Clusters. This would suggest that the needs of rural areas would be more sustainably provided thorough development at the Key Service Centres and Main Towns contrary to the strategy proposed in the GNLP. The GNLP strategy is even less sustainable, given that development at the Key Service Centres and Main Towns provides the opportunity to enhance community facilities which serve the rural areas.

6.22 Furthermore, the reliance upon a specific contribution from the unknown sites yet to be identified in South Norfolk may require unsustainable sites to be brought forward rather than identifying more sustainable sites now. In the absence of such specific sites being identified and allocated this will also adversely affect the housing land supply position of the Councils and provide for a lack of certainty going forward.

7. THE SITES PLAN

Introduction

7.1 There is a Sites Plan which accompanies the GNLP which identifies the preferred new sites for allocation and allocations which are proposed to be carried forward from the existing Development Plan as well as sites which are considered to be reasonable and unreasonable alternatives.

7.2 The opportunities provided from the development of the site at Land at Rightup Lane, Wymondham are outlined below. Following which the way these have been considered in the site selection process which was undertaken through the Site Assessment Booklets and the Sustainability Appraisal, is considered.

Land at Rightup Lane, Wymondham

7.3 Wymondham is the largest settlement in South Norfolk and is strategically well placed for development being on the Cambridge/Norwich Tech Corridor with a wealth of services and facilities and access to sustainable transport infrastructure including two train stations. Wymondham is a highly sustainable settlement which is recognised as a Main Town in the GNLP.

7.4 Nevertheless, notwithstanding the obvious sustainability credentials of Wymondham to accommodate additional growth, only 100 additional homes are proposed to be allocated. This is notwithstanding the fact that there are sustainable small sites which are suitable for allocation including the Land at Rightup Lane which are likely to be required to ensure that 10% of the housing requirement is delivered on small or medium sized as required by paragraph 68a of the NPPF. The allocation of smaller deliverable sites will also support the ability of the Council to demonstrate a five-year land supply.

7.5 The Illustrative Site Layout in support of the Land at Rightup Lane has been designed to deliver a high-quality scheme including a landscape buffer along the eastern boundary to enhance the Green Infrastructure Corridor identified in the Wymondham Area Action Plan.

Site Assessment Booklets

7.6 The Site Assessment Process Methodology which has informed the Greater Norwich Local Plan Regulation 18 Consultation is set out in the Introduction and Methodology section of the Site Assessment Booklets.

7.7 The Site Assessment Process Methodology identifies a 7-stage process which was employed for the purposes of assessing sites:

- Stage 1- List of sites promoted in the settlement
- Stage 2 - Housing and Economic Land Availability Assessment (HELAA)
- Stage 3 - Summary of the consultation comments
- Stage 4 - Discussion of submitted sites
- Stage 5 - Shortlist of reasonable alternative sites for further assessment
- Stage 6 - Detailed site assessments of reasonable alternative sites
- Stage 7 - Settlement based appraisal of reasonable alternative sites and identification of preferred sites.

7.8 All of the sites analysed in the Housing Economic Land Availability Assessment (HELAA 2017) are also considered in the Sustainability Appraisal published in January 2020.

7.9 The way in which each of the sites in each settlement were considered is set out in the relevant Site Assessments Booklet.

Stage 1 - List of sites promoted in the settlement

7.10 This Stage identified all of the potential alternative sites in each settlement, including the Land at Rightup Lane, Wymondham.

Stage 2 - Housing and Economic Land Availability Assessment (HELAA)

7.11 This site selection process then took account of the information which had been gathered for each site in the HELAA, which categorises the performance of each site as either 'red', 'amber' or 'green' against different criteria.

7.12 Whilst the HELAA only provides a high-level assessment, it assessed the Land at Rightup Lane as performing more favourably than one of the proposed allocations at Land at Johnson's Farm.

7.13 The HELAA correctly concluded that the Land at Rightup Lane, Wymondham was suitable for development.

Stage 3 - Summary of the consultation comments

- 7.14 All of the sites were subject to consultation in both January to March 2018 and October to December 2018. These consultation comments inform the next stage of the site selection process.

As recorded in the Site Assessment Booklet for Wymondham, the only comments received in relation to Land at Rightup Lane were supportive given that the development of this site would have a minimal impact and would form a natural extension to the current allocations.

Stage 4 - Discussion of submitted sites

- 7.15 The Introduction and Methodology report states that “in addition to the HELAA assessment and consultation responses a range of factors have been considered in order to establish whether a site should, or should not be, considered suitable for allocation and shortlisted as a reasonable alternative at this stage for further consideration”. In particular, it is identified that these additional factors include a consideration of the impact on heritage and landscape, on the form and character of the settlement, the relationship to services and facilities, environmental concerns including flood risk and the existence of a safe walking route to a primary school within 3km.
- 7.16 The Land at Rightup Lane was identified as reasonable alternative subject to identifying a suitable access.
- 7.17 Pigeon have engaged with the local highway authority regarding a proposed access strategy for the site. On the basis of these discussions a phased approach to ensure that a satisfactory access can be achieved is proposed. Norfolk County Council permit that a maximum of 8 No. units can be accessed off of a private drive. As such, the access strategy would comprise delivering Phase 1 for up to 8 homes off a private drive from Rightup Lane and then subsequently, following either improvement works to Rightup Lane or gaining access through the neighbouring development sites (identified in the Wymondham Area Action Plan), developing the remainder of the site.

Stage 5 - Shortlist of reasonable alternative sites for further assessment

- 7.18 The reasonable alternative sites were then shortlisted in Stage 5 including the Land at Rightup Lane, Wymondham.

Stage 6 - Detailed site assessments of reasonable alternative sites

- 7.19 The reasonable alternatives were subject to further assessment by officers from the partner councils including Development Management, Conservation, Highways, Flood and Education colleagues. It is also identified that they were discussed at a series of workshop sessions where professional advice was received and that site visits were undertaken. The results of these further assessments are presented in Stage 6 of the Site Assessment Booklets.
- 7.20 No concerns were raised by Highways, Minerals & Waste or the Lead Local Flood Authority. Development Management officers identified that the site was considered suitable for allocation subject to highway constraints being addressed as part of recent allocations and/or upgrades to Rightup Lane, in accordance with the phased approach proposed by Pigeon in light of discussions with the local highway authority. Children's Services also identified that there is pressure for pupil places and additional development would be dependent upon the provision of a new school.
- 7.21 The Infrastructure Needs Report identifies that a new 420 place Free School is due to open in September 2020 and that another 420 place primary school is planned to be delivered at Silfield as part of the neighbouring development. It is therefore likely that there will be sufficient educational provision to accommodate the proposed development of up to 27 homes.

Stage 7 - Settlement based appraisal of reasonable alternative sites and identification of preferred sites.

- 7.22 At Stage 7, the site selection process identifies 10 reasonable alternatives at Wymondham owing to the fact that these no major constraints had been identified. However, for some inexplicable reason, these did not include the Land at Rightup Lane notwithstanding the fact that the assessment had identified that this site was suitable for allocation.
- 7.23 The Site Assessment Booklet then proposes two allocations from the 10 reasonable alternatives based on "further discussion". There is however no

- evidence as to what these further discussions entailed or demonstrated to justify the selection of these sites in preference to any others.
- 7.24 Stage 7 does not undertake any additional analysis but presents a summary based on the preceding analysis of why sites have been categorised as preferred options, reasonable alternatives or unreasonable alternatives.
- 7.25 It identifies that the Land at Rightup Lane is not considered to be suitable for allocation contrary to all of the preceding analysis and justifies this on the basis that the site is remote from the town, the potential for noise from the A11, highways constraints and access constraints.
- 7.26 Many of these alleged constraints have not been identified anywhere in the preceding assessment and appear to have been retrospectively identified to justify not allocating the site contrary to the recommendation of Development Management officers, including the following.
- 7.27 The Land at Rightup Lane is immediately adjacent to other developments which have been allocated and permitted indicating that the distance from the town has not acted as a constraint in the immediate locality.
- 7.28 A Noise Survey and Assessment of Impact has been undertaken and this has informed the Illustrative Site Layout which ensures that all dwellings are offset by at least 15m from the A11 carriageway edge which along with a 1.8m high acoustic bund/barrier and a landscaped buffer, will satisfactorily screen the proposed development from noise.
- 7.29 The identification of highways constraints is directly contrary to the preceding assessment within the Site Assessment Booklet. The local highway authority has not raised any concerns and so the suggestion that there are highways constraints is not supported by the evidence.
- 7.30 Whilst access constraints have been previously identified in the Site Assessment Booklet, as described above, discussions have been held with Norfolk County Council Highways regarding a proposed access for the site. On the basis of these discussions a phased approach to the Site is proposed, demonstrating that a satisfactory access solution can be provided.
- 7.31 Therefore, each and every one of the identified constraints which have been identified to justify not allocating the Land at Rightup Lane is either not

supported by the evidence, and/or new evidence is available that demonstrates that these can be satisfactorily addressed.

Sustainability Appraisal of the Greater Norwich Local Plan Regulation 18 published in January 2020

- 7.32 A Sustainability Appraisal (SA) has been carried out in support of the GNLP. This assesses Land at Rightup Lane, Wymondham as a reasonable alternative for a residential development of 33 homes. Accordingly, the SA does not assess the form of development now proposed at this site, namely a high-quality scheme providing up to 27 homes. It is therefore likely that the environmental impacts of the development of this site identified in the SA will overestimate the impacts of the proposed development.
- 7.33 SA Objectives 1-4 – Air Quality and Noise; Climate Change Mitigation and Adaptation; Biodiversity, Geodiversity and Green Infrastructure; and Landscape – the SA identifies that the Land at Rightup Lane performs equally as well as any other site in Wymondham or across the entire GNLP area under these objectives⁸.
- 7.34 In particular, the SA notes that the Land at Rightup Lane is wholly within Flood Zone 1 and would therefore be expected to have a minor positive impact. It also identifies that the Land at Rightup Lane is unlikely to be discordant with the key characteristics of the landscape character area.
- 7.35 SA Objective 5 – Housing – the SA indicates that as the Land at Rightup Lane provides less than 100 homes, it has only a minor positive impact under this objective. This is nevertheless a positive impact.
- 7.36 SA Objective 6 – Population and Communities – the SA assesses the majority of sites within Wymondham as having a minor negative impact under this objective including one of the proposed allocations at Land at Johnson’s Farm owing to

⁸ Except for a very few sites which are assessed as having a negligible rather than minor negative impact under SA Objective 3: Biodiversity, Geodiversity and Green Infrastructure.

- the distance to a convenience store or a post office and this has not acted as a constraint to allocation.
- 7.37 The development of the neighbouring site includes the provision of retail floorspace, and whilst the precise use is not yet known, this may have implications for the accessibility of convenience foods and therefore for the SA assessment in the near future.
- 7.38 SA Objective 7 – Deprivation – whilst this is identified as an SA objective, no assessment has been undertaken of the potential effects of development upon deprivation and every site across the GNLP area is assessed as having no impact.
- 7.39 SA Objective 8 – Health – the SA assesses the Land at Rightup Lane as having a major negative impact under this objective owing to it being outside the target distance from a Hospital, a GP surgery and a leisure centre. The same conclusion is reached for 9 sites in Wymondham including one of the proposed allocations at Land at Johnson’s Farm and this has not acted as a constraint to allocation.
- 7.40 SA Objective 9 – Crime – whilst this is identified as an SA objective, no assessment has been undertaken of the potential effects of development upon crime and every site across the GNLP area is assessed as having no impact.
- 7.41 SA Objective 10 – Education – the SA assesses the Land at Rightup Lane as having a major negative impact under this objective owing to it being outside the target distance from a primary school and a secondary school. The same conclusion is reached for 7 sites in Wymondham including one of the proposed allocations at Land at Johnson’s Farm and this has not acted as a constraint to allocation.
- 7.42 The SA also does not appear to take into account the proposed development of a primary school as part of the development on the neighbouring site which would result in Land at Rightup Lane being assessed more favourably under this objective.
- 7.43 SA Objective 11 – Economy – the SA assesses the Land at Rightup Lane as having a minor positive impact under this objective.
- 7.44 SA Objective 12 – Transport and Access to Services – all of the sites at Wymondham are assessed as having a minor negative impact under this objective with one exception which is assessed as having a major negative

- impact. Therefore, the Land at Rightup Lane performs equally as well as the best performing sites in the town in this regard.
- 7.45 SA Objective 13 – Historic Environment – the SA assesses the Land at Rightup Lane as having a negligible effect under this objective, which is the joint most favourable assessment of any site in Wymondham or across the entire GNLP area.
- 7.46 SA Objective 14 – Natural Resources, Waste and Contaminated Land – the SA suggests that the development of housing will increase household waste. The waste which arises will be largely attributable to the population that would exist regardless of development rather than the number of dwellings. It is not clear that this has been taken into account when assessing the waste impacts.
- 7.47 The SA also suggests that the use of previously undeveloped land would necessarily be an inefficient use and land. As a result of the housing need and the capacity of previously developed sites, this is not a credible position as it will be necessary for some greenfield development to be forthcoming.
- 7.48 Nevertheless, the SA assesses the Land at Rightup Lane as performing equally as well as the least constrained sites in Wymondham under this objective.
- 7.49 SA Objective 15 – Water – the SA assesses all of the sites in Wymondham, and the majority across the GNLP area as providing a minor negative impact under this objective.
- 7.50 In summary, the SA has assessed the Land at Rightup Lane, and it has been identified as performing equally as well if not better than other sites within Wymondham under the majority of objectives. The site will perform even more favourably once the facilities proposed to be provided on the neighbouring development are delivered as this will increase the accessibility of the Land at Rightup Lane to such facilities

Conclusions on the Sites Plan

- 7.51 As identified throughout these representations, the site selection process (including the Site Assessment Booklets and the SA) which has informed the allocations proposed within the GNLP is flawed including because:

- It is internally inconsistent with constraints such as highways being identified as a barrier to the development of Land at Rightup Lane notwithstanding the local highways authority having raised no concerns;
- It reaches conclusions on the basis of different evidence than that which has been considered such as identifying that noise impacts, the proximity to the town centre and highways as acting as a constraint to the development of Land at Rightup Lane notwithstanding that these had not been identified as issues throughout the assessments;
- It is based on a high-level assessment without the detailed work having been undertaken as has been done on behalf of Pigeon which demonstrates that the Land at Rightup Lane can be sustainably delivered.

7.52 Pigeon would welcome the opportunity to meet with officers to discuss the opportunities which can be provided through the delivery of the site at Land at Rightup Lane.