

**Greater Norwich Local Plan – Regulation 18 Draft Strategy Consultation (January 2020)**  
**Draft Representations**  
**Taylor Wimpey East Anglia**

## **Introduction**

This note sets out the draft representations to the Greater Norwich Local Plan consultation documents, comprising the Draft Strategy document and the Site Allocations document. The representations to the Site Allocations document will refer to the findings of the site assessments in the Housing and Economic Availability Assessment (HELAA) and Sustainability Appraisal (SA).

The final version of the representations will be uploaded to the Council's online consultation system.

## **GNL – Draft Strategy Questions**

### *6. Do you support or object to the vision and objectives for Greater Norwich?*

The topics included within the Vision and Objectives for GNL are generally supported. However, it is considered that the objectives related to homes and delivery would not be achieved in full because in some instances inappropriate sites have been selected as preferred options or reasonable alternatives.

#### Land off Townhouse Road, Costessey

A number of sites have been identified as a reasonable alternative housing allocation at Costessey, including a strategic extension for +1,200 dwellings at land off Bawburgh Lane and New Road (Ref. GNL0581) and land north of New Road and east of A47 (Ref. GNL2043); Policy 7.1 includes a contingency for Costessey to offset non-delivery. It is very unlikely that this strategic extension would be delivered quickly enough to address a housing land supply shortfall in Costessey in the short term. The lead-in times for these types of developments are typically more than 5 years, largely because they are complex and require significant levels of primary infrastructure to be provided e.g. roads and drainage in advance of housing. In addition, it is not clear at this stage whether this strategic extension would provide policy compliant levels of affordable housing, and as set out in the representations to the Site Allocations document there may be access constraints affecting development at this site. Therefore, it is considered that the strategic extension at land off Bawburgh Lane and New Road in Costessey identified as a reasonable alternative would not meet the housing needs aim of the delivery objective, and subject to confirmation from the site promoter about affordable housing it may not meet the mixed housing tenure aim of the homes objective. As set out in the representations to the Site Allocations document, there are smaller sites on the edge of Costessey which can be delivered more easily and where constraints can be mitigated e.g. land off Townhouse Road in Costessey (Ref. GNL0284R).

## Land at Green Lane West, Rackheath

Taylor Wimpey East Anglia control land to the west of Green Lane West in Rackheath (Ref. Policy GNL0172) is identified as a preferred allocation in GNL0 for up to 200 dwellings. This site has a resolution to grant planning permission for the provision of 205 homes (App Ref. 20172208), there are no constraints to development, and it is controlled by a housebuilder (Taylor Wimpey). As explained in the representations to the Site Allocations document, this site is suitable for development and is deliverable, and should be retained as a preferred allocation. In these circumstances the site would contribute towards the GNL0 objectives related to homes and delivery.

*9. Do you support, object, or have any comments relating to the approach to housing set out in the Delivery Statement?*

We object to the approach to housing set out in the Delivery Statement in respect of the contingency locations for growth at Costessey to offset any non-delivery of housing elsewhere, and in particular the sites selected as reasonable alternatives/contingency locations in those settlements.

A number of sites have been identified as a reasonable alternative housing allocation at Costessey, including a strategic extension for +1,200 dwellings at land off Bawburgh Lane and New Road (Ref. GNL0581) and land north of New Road and east of A47 (Ref. GNL02043). It is very unlikely that this strategic extension would be delivered quickly enough to address a housing land supply shortfall in Costessey in the short term. The lead-in times for these types of developments are typically more than 5 years, largely because they are complex and require significant levels of primary infrastructure to be provided e.g. roads and drainage in advance of housing. Therefore, it is considered that the reasonable alternative sites selected for the contingency approach at Costessey i.e. the strategic extension at land off Bawburgh Lane and New Road is not deliverable as a contingency. In addition, as set out in the representations to the Site Allocations document, there are smaller sites on the edge of Costessey which can be delivered more easily and where constraints can be mitigated, which should be identified as a reasonable alternative to meet the contingency approach e.g. land off Townhouse Road in Costessey (Ref. GNL0284R).

*13. Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?*

The proposed settlement hierarchy and the proposed distribution of housing, as set out in Policy 1, is supported.

*14. Do you support, object or wish to comment on the approach for housing numbers and delivery?*

The standard method is used in emerging GNL0 to determine the minimum number of houses needed during the plan period. Section Id.2a of the Planning Practice Guidance explains how housing and economic needs assessments should be undertaken, including how to calculate local housing needs using the standard method. Firstly, Paragraph 010 identifies the circumstances where increases to housing need might be appropriate, including where there is a growth strategy, strategic infrastructure improvements are proposed, and to meet unmet needs from a neighbouring area. The consultation document for emerging GNL0 refers to employment growth and infrastructure. It is

requested that the draft version of GNL P includes confirmation that the circumstances identified in Paragraph 010 of Id.2a have been taken into account for the housing requirement. Secondly, Paragraph 024 of Id.2a explains how the need for affordable housing is calculated, and it is suggested that the overall housing target should be increased where it could help deliver the required number of affordable homes. It is not clear whether the housing requirement for emerging GNL P has considered an uplift to meet affordable housing needs. It is requested that the draft version of GNL P includes confirmation that an uplift to the housing requirement to meet affordable housing needs has been considered and assessed.

*19. Do you support, object or have any comments relating to the specific requirements of the policy.*

Policy 2: Sustainable Communities identifies a number of criteria to ensure the delivery of high quality development. Criteria 5 seeks to respect, protect and enhance landscape character.

#### Land at Green Lane West, Rackheath

A full Landscape and Visual Impact Assessment (LVIA) has been prepared for the proposed allocation at land to the west of Green Lane West in Rackheath (Ref. Policy GNL P0172) as part of the current planning application at the site. In summary, there are residential areas to the north, commercial development to the south, the Norwich Northern Distributor Road (A1270) to the west, and the proposed strategic development at North Rackheath Urban Extension would be located to the east. The site is enclosed by a dense hedgerow and hedgerow tree planting to the east. The majority of the existing vegetation within the site would be retained within the proposed development. The proposed residential areas will include landscaping and structural planting. The proposed development includes a substantial area to the east of the Norwich Northern Distributor Road for landscape enhancement and new wildlife habitats. The overall conclusion from the LVIA is that the site is a suitable location for residential development in terms of landscape and visual impacts, provided the landscape mitigation and enhancement measures are implemented. The case officer for the planning application accepted that the development would be visible in the immediate area, but concluded that the site would be well screened from long distance views and that the additional landscaping to be provided as part of the proposed development would reduce the visual impact. In addition, the case officer acknowledged the provision of open space, green infrastructure, highway access and an acoustic bund would ensure the delivery of a high quality development.

#### Land off Townhouse Road, Costessey

A draft Landscape & Visual Impact Assessment has been prepared for the land off Townhouse Road in Costessey (Ref. GNL P0284R), which is identified as an unreasonable site in the GNL P Site Assessment document for Costessey sites. The landscape impact was one of the reasons why the site was assessed as unreasonable. It is considered that landscape impacts can be mitigated. This site is well-related to the existing built-form in Costessey and represents a natural and logical continuation of the settlement. The majority of the existing vegetation at the site boundary will be retained within the promoted development. The promoted development will enhance the boundaries to the site, with new tree planting on the western boundary and a new woodland belt on the southern boundary, alongside green corridors, planting and areas of open space within the development. The significant green buffers and corridors are provided to mitigate the impact of new development at the site and

integrate it into the landscape setting. Therefore, it is considered that the promoted development at the site would respect, protect and enhance the landscape character of the surrounding area and edge of Costessey, which is consistent with Criteria 5 of Policy 2.

In addition, the delivery of green infrastructure and landscaping at the Green Lane West site in Rackheath and Townhouse Road site in Costessey would contribute towards Criteria 3 of Policy 2.

Policy 2 includes a requirement for delivery statements to be prepared for developments of 100 dwellings or more, setting out a timetable for housing delivery at the site. The requirement for a delivery statement is appropriate, but the information provided in the statement needs to be robust, and a statement is no substitute for the allocation of deliverable sites in emerging GNLP. It is considered that a detailed assessment of housing delivery should be undertaken before sites are allocated for development or identified as reasonable alternatives, because discussions with developers on its own represents a limited and inadequate approach.

A detailed assessment of housing delivery would have highlighted that the proposed strategic extension contingency sites for +1,200 dwellings at land off Bawburgh Lane and New Road (Ref. GNLP0581) and land north of New Road and east of A47 (Ref. GNLP2043) cannot be delivered quickly enough to address non-delivery at allocations and commitments in Costessey in the short term. As set out in the representations to the Site Allocations document, land off Townhouse Road in Costessey (Ref. GNLP0284R) is deliverable, is controlled by a housebuilder, and should be allocated or identified as a reasonable alternative site.

*21. Do you support, object or have any comments relating to the approach to the natural environment?*

#### Land at Green Lane West, Rackheath

It should be noted that national guidance expects planning decisions to contribute towards and enhance the natural environment, and to secure measurable net gains for biodiversity – see Paragraphs 170 and 174 of the NPPF. It should be acknowledged that development can deliver ecological enhancements and net biodiversity gains. The proposed allocation at Green Lane West in Rackheath would include ecological enhancements. The case officer for the planning application accepted that the site currently has limited ecological value and the open space is not managed, and concluded that the proposed development would lead to a net gain in biodiversity.

#### Land off Townhouse Road, Costessey

The promoted development at Townhouse Road in Costessey would include ecological enhancements. Where possible, hedgerows at the boundaries of the site should be retained and enhanced to create corridors and shelter/foraging areas for wildlife including birds, bats, badgers and hedgehogs. Planting of native hedgerow species in gaps, for example along the southern and eastern boundaries will provide further opportunities for these species and enhance their value as ecological corridors.

The addition of bat boxes to any new buildings or retained trees within the site would provide additional roosting opportunities. Schwegler bat boxes are recognised as being suitable for roosting bats and long lasting. Bat boxes should ideally be located south facing (between south-east and south-

west) and above 5m. Boxes such as Schwegler 2F or integral bat tubes Schwegler 1FR suitable for pipistrelles would be suitable for this site.

Landscaping could incorporate native or wildlife attracting trees, shrubs, and wildflower areas as these would likely be of benefit to a variety of wildlife including, birds, bats and invertebrates. Such landscaping could also act as a receptor area should reptiles be recorded using the site and require translocation.

The incorporation of a reptile hibernaculum into the landscape design (preferably within any wildflower grassland) will enhance the area for reptiles in the future. Hibernacula can be created by partially burying piles of wood/rubble and covering with earth. Hibernacula in the form of log piles could also benefit hedgehogs.

The addition of a range of bird boxes would provide additional nesting opportunities. This could include house sparrow terraces on any new buildings on site providing additional nesting opportunities for this BoCC red listed species recorded on/over site. Further standard bird boxes sited on mature trees will help attract a greater diversity of birds to nest. Boxes should be located out of direct sunlight and close to, but not restricted by, vegetation. A suitably qualified ecologist should be consulted to determine the exact location and position of the bird boxes.

The addition of insect houses/hibernacula within retained or created wildflower grassland would retain shelter and hibernation opportunities for invertebrates using the grassland or boundary habitats.

*27. Do you support, object or have any comments relating to approach to affordable homes?*

The affordable housing requirements in Policy 5: Homes are noted, including that the affordable housing requirement is lower for development in Norwich compared with Broadland and South Norfolk. However, it is normal for strategic extensions and new settlements/garden villages to not provide policy compliant levels of affordable housing during the initial phases of development because of the costs of providing primary infrastructure e.g. roads, drainage, strategic landscaping, and community uses in advance of residential development. It is very unlikely, and potentially undesirable, for affordable housing requirements to be increased for later phases of development at strategic extensions and new settlements to address under-delivery in initial phases. Therefore, it is considered that the strategic extension identified as reasonable alternatives for housing allocations at Costessey would not meet the policy requirements for affordable housing. In these circumstances, other sites that can deliver policy compliant levels of affordable housing should be identified in emerging GNLP. The preferred allocation at land to the west of Green Lane West in Rackheath (Ref. GNLP0172) and the promoted development at land off Townhouse Road in Costessey (Ref. GNLP0284R) will both deliver affordable housing. The planning application for the proposed development at Green Lane West in Rackheath provided for 33% of the dwellings to be for affordable housing.

*40. Do you support or object or wish to comment on the approach for elsewhere in the urban area including the fringe parishes? Please identify particular issues.*

## Land off Townhouse Road, Costessey

Policy 7.1 contains the development strategy for the Norwich Urban Area and the fringe parishes. We object to the strategy for Costessey, in respect of the decision to make no allocations in the village and the sites identified as reasonable alternatives. A number of sites have been identified as a reasonable alternative housing allocation at Costessey, including a strategic extension for +1,200 dwellings at land off Bawburgh Lane and New Road (Ref. GNLP0581) and land north of New Road and east of A47 (Ref. GNLP2043). The land off Townhouse Road in Costessey (Ref. GNLP0284R) is promoted for residential development, but it is considered that this site has been incorrectly identified as an unreasonable site in the GNLP Site Assessment document.

It is very unlikely that the strategic extension sites in Costessey identified as reasonable alternatives would be delivered quickly enough to address a housing land supply shortfall in Costessey in the short term. The lead-in times for these types of developments are typically more than 5 years, largely because they are complex and require significant levels of primary infrastructure to be provided e.g. roads and drainage in advance of housing. On this basis, it is considered that the strategic extension sites in Costessey are not reasonable because they would not meet the purpose of a contingency site i.e. to meet non-delivery elsewhere. In addition, as set out in the representations to the Site Allocations document, there are identified constraints and uncertainties to development at the strategic extension sites in Costessey (Ref. GNLP0581 and GNLP2043), including access arrangements and proximity to the Norwich Southern Bypass. It has not yet been confirmed that these strategic extension sites are available or suitable for development, and as such they should not be identified as reasonable alternatives. Furthermore, the other identified reasonable alternative site in Costessey, at Roundwell Works (Ref. GNLP0593) would lead to the loss of employment land and the access arrangements have not been confirmed, and as such it may also not be a reasonable alternative site.

As set out in the representations to the Site Allocations document for Costessey sites, the promoted development at land off Townhouse Road in Costessey (Ref. GNLP0284R) is smaller than the strategic extension site, it is controlled by a housebuilder, and is available for development, and as such it could meet the requirements for a contingency site to meet non-delivery elsewhere. A number of technical reports and studies have been prepared for the site which demonstrate that there are no constraints to development and significant impacts can be mitigated, and concept plans have been prepared to identify different development options for the site i.e. 100, 130 and 200 dwelling options. The technical evidence demonstrates that landscape impacts can be mitigated by retaining existing trees and hedges, providing new areas of woodland and landscaping, and creating new areas of open space. The site is not affected by flood risk, and a drainage strategy would be prepared for the promoted development to manage surface water drainage. An area of open space would be created at the site frontage along Townhouse Road. Therefore, it is considered that land off Townhouse Road in Costessey (Ref. GNLP0284R) should be allocated in emerging GNLP or identified as a reasonable alternative site to meet future needs.

## **GNL - Site Allocations Document**

Paragraph 146 of the GNL Draft Strategy document states that the strategy is based on an extensive evidence base. That evidence base includes the Housing and Economic Land Availability Assessment, Site Assessments, and the Sustainability Appraisal and Strategic Environmental Assessment.

Paragraph 35 of the NPPF identifies how soundness will be determined for plan-making. The justified soundness test states: *“an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;...”*. To be justified means that policies and site allocations in emerging GNL should be based on robust and credible evidence.

It is considered that the findings of the site assessments for some of the preferred allocations and reasonable alternatives are not robust or credible, including those in Costessey. Taylor Wimpey also controls land in Rackheath identified as a preferred allocation, and we comment on the assessment of that site.

## **Site Assessments - Costessey**

### **GNL0581 - Land off Bawburgh Lane and New Road**

This site is identified for a strategic extension for +1,000 dwellings. It is identified as a reasonable alternative housing allocation and as a contingency site to offset non-delivery. The lead-in times for these types of developments are typically more than 5 years, largely because they are complex and require significant levels of primary infrastructure to be provided e.g. roads and drainage in advance of housing. Therefore, it is very unlikely that this strategic extension would be delivered quickly enough to address non-delivery of housing at existing commitments and allocations. As such, this site does not meet the requirements for a contingency site, and should not be identified as a reasonable alternative in emerging GNL. It is not clear at this stage whether this strategic extension would provide policy compliant levels of affordable housing. It is requested that the site promoter confirms whether the proposed development could provide policy compliant levels of affordable housing, taking into account the costs of providing primary infrastructure in advance of development. The site assessment in the HELAA identified a number of constraints to development at the site associated with the following: overhead power lines; adjacent contaminated site; landscape; surface water flooding; townscape; access arrangements; and, proximity to Norwich Southern Bypass. These issues should have been assessed before the site was identified as a reasonable alternative. It is very likely that these constraints will confirm that most, if not all, of the site is not suitable for the proposed development.

It is requested that this site is deleted as a reasonable alternative housing allocation.

### **GNL2043 – Land north of New Road and east of A47**

This site is adjacent to land off Bawburgh Lane and New Road in Costessey (Ref. GNL0581) and is identified as additional land for the strategic extension in this location; to provide an additional +200 dwellings. The delivery of this site is reliant on the larger site for access arrangements and could not come forward separately. The constraints to development are similar to those that exist for the larger



site. The site is also not available as a contingency to meet non-delivery of housing at commitments and allocations.

It is very likely that the constraints at the site will confirm that most, if not all, of it is not suitable for the proposed development. Therefore, it is requested that this site is deleted as a reasonable alternative housing allocation.

## GMLP0284R - Townhouse Road

This site is promoted by Taylor Wimpey East Anglia. The site has been identified as an unreasonable alternative in the site assessments for emerging GMLP.

The promoted development is smaller than the proposed strategic extension sites (GMLP0581 and GMLP2043) and as such it could meet the requirements for a contingency site to meet non-delivery at the commitments and allocations elsewhere. The site is controlled by a housebuilder and is available for development. It is considered that a number of smaller sites, which could be delivered at the same time by different housebuilders/developers, would be a more appropriate approach to address non-delivery of housing and a housing land supply shortfall in the future.

A number of technical reports and studies have been prepared for the site which demonstrate that there are no constraints to development and significant impacts can be mitigated, and concept plans have been prepared to identify different development options for the site i.e. 100, 130 and 200 dwelling options. It should be noted that all three scheme options would avoid extending the line of the settlement further south into the River Tud Valley, and include significant green buffers and corridors to mitigate the impact of new development and to integrate it into the landscape setting.

A draft Landscape & Visual Impact Assessment has been prepared for the promoted development, and is submitted with these representations. The site is well-related to the existing built-form in Costessey and represents a natural and logical continuation of the settlement. The majority of the existing vegetation at the site boundary will be retained within the proposed development. The promoted development will enhance the boundaries to the site, with new tree planting on the western boundary and a new woodland belt on the southern boundary, alongside green corridors, planting and areas of open space within the development. The significant green buffers and corridors are provided to mitigate the impact of new development at the site and integrate it into the landscape setting.

A Preliminary Ecological Appraisal and Reptile Survey have both been carried out on the site. Any redevelopment of the site would need to consider the impact upon bats, and Activity Surveys would need to be carried out, in order to inform a mitigation/compensation strategy. Furthermore, precautionary measures are proposed for breeding birds. There were no signs of reptiles on the site. Accordingly, with the above measures, it is considered that any development could proceed with minimal impact on the local conservation status of any protected, principally important or rare species within the area.

The Roman Catholic Church of Our Lady and Saint Walstan, located to the west of the site, is a Grade II Listed Building. A draft Built Heritage Assessment has been prepared for the promoted development,



and is submitted with these representations. The Church is surrounded by extensive tree cover which limits the setting of the heritage asset, and means that the surrounding area and the site do not contribute towards the significance of the heritage asset. In any event, a generous buffer between the heritage asset and new built development in the form of an area of open space could be provided. The site frontage includes open space and new planting.

A draft Transport Assessment has been prepared for the promoted development and is submitted with these representations. The site is located on an existing public transport corridor, with regular bus services between Costessey and Norwich City Centre. There are existing bus stops on Townhouse Road within walking distance of the site. The promoted development would provide a new footway on the southern side of Townhouse Road to connect with the existing footway network in Costessey. A traffic calming scheme on Townhouse Road would be provided as part of the promoted development, in order to reduce speeds in the vicinity of the site access and to improve the pedestrian environment where the existing footway is narrow. The promoted development would be served by a single point of access off Townhouse Road, which would meet current highway design guidance in terms of layout and visibility. It has been demonstrated in the Assessment that the promoted development would have a negligible impact on the local highway network, and the proposed junction and access arrangements would have ample capacity.

The site is not affected by flood risk, and a drainage strategy would be prepared for the promoted development to manage surface water drainage.

Therefore, it is considered that land off Townhouse Road in Costessey (Ref. GNLP0284R) should be allocated in emerging GNL or identified as a reasonable alternative site to meet future needs. The concept plans prepared for the promoted development could be used as a basis for an allocation.

## **Site Assessments - Rackheath**

### GNLP0172 - Land to the west of Green Lane West

Taylor Wimpey East Anglia control land to the west of Green Lane West in Rackheath. The site is identified as a preferred allocation in GNL for up to 200 dwellings. This allocation is supported and should be retained.

An outline planning application for 205 dwellings has been submitted for the promoted development (Ref. 2017/2208). This site is has a resolution to grant planning permission and the S106 Agreement has been signed. The decision on the application demonstrates that the site is suitable for the promoted development, that proposed mitigation measures can address any significant constraints associated with the development, and conditions can be used to make the development acceptable. The site is controlled by a housebuilder and is deliverable.

The Taylor Wimpey East Anglia representations to the Regulation 18 Growth Strategy consultation in March 2018 requested amendments to the assessment of the site in the HELAA, and in particular to those topics that scored 'amber'. The topics that scored 'amber' and should be amended to 'green' relate to access, access to services, utilities capacity, contamination, flood risk, significant landscapes, and compatibility with neighbouring uses.

The proposed development is deliverable and would contribute to the five year housing land supply. The timetable for the delivery of development is as follows:

- Reserved Matters to be submitted in July 2020
- Reserved Matters to be approved in December 2020
- Start on site is expected in January 2022
- First homes to be completed in July 2022
- Annual housing delivery rate of 60 dwellings per annum

In conclusion, it is requested that land to the west of Green Lane West (Ref. GNLP0172) is retained as an allocation in draft GNLP.

**Carter Jonas – 16<sup>th</sup> March 2020**