

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

**ON BEHALF OF: PIGEON INVESTMENT MANAGEMENT LIMITED
LAND AT HETHERSETT**

Pegasus Group

Pegasus House | Querns Business Centre | Whitworth Road | Cirencester | Gloucestershire | GL7 1RT

T 01285 641717 | **F** 01285 642348 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN | **ENVIRONMENT** | **PLANNING** | **ECONOMICS** | **HERITAGE**

©Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

CONTENTS:

	Page No:
1. INTRODUCTION	1
2. VISION AND OBJECTIVES	2
3. POLICY 1 – THE SUSTAINABLE GROWTH STRATEGY	3
4. POLICY 2 – SUSTAINABLE COMMUNITIES	14
5. POLICY 5 – HOMES	19
6. POLICY 6 – ECONOMY	23
7. POLICIES 7.1-7.5 – THE SPATIAL STRATEGY	24
8. THE SITES PLAN	30

APPENDIX 1 - DELIVERY STATEMENT

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 the Hethersett Consortium ('the Landowners') in support of the allocation of Land at Hethersett.

1.2 The Land at Hethersett, which comprises four sites, provides the opportunity for a range of uses to complement the existing allocation including:

- A new Education and Sports Campus, to comprise a new 2FE Primary School site with Pre-School provision, land for a Key Stage 3 campus for Hethersett Academy, together with a range of new recreation and sports facilities that would provide a high-quality facility for the village and around 50 new homes on Land at Burnthouse Lane;
- Employment land providing jobs in close proximity to the workforce accommodated in the homes delivered as part of the existing HET1 allocation and within the village at Land off Little Melton Road;
- Around 400 homes including affordable housing and a mix of housing types, tenures and sizes to meet the needs of the community including specialist needs at Land off Hethersett Road with generous areas of amenity space and green infrastructure;
- A care home/care village including generous areas of amenity space and green infrastructure to respond to the need for housing to meet the needs of older people within Hethersett and across the GNLP area at Land off Station Road.

1.3 The following representations address the Vision and Objectives, Policies 1, 2, 5, 6, 7.1, 7.3 and 7.4 and the identification of sites for allocation within the emerging GNLP. The accompanying Delivery Statement demonstrates that the Land at Hethersett 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 across the GNLP area as a whole. 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.

3.38 Similarly, if an insufficient amount of employment land is actually developed and occupied, this should trigger an immediate review of the GNLP to bring forward additional employment land allocations alongside a policy response to consider employment planning applications more favourably in the interim.

The approach to five-year land supply

3.39 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

3.40 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

3.41 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.

- 3.42 We have concerns 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.
- 3.43 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.
- 3.44 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.
- 3.45 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.
- 3.46 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.
- 3.47 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.

- 3.48 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 and the Key Service Centres, including Hethersett with an associated reduction in the percentage to be delivered in the Norwich urban area and within the Village Clusters.
- 3.49 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.
- 3.50 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.
- 3.51 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.
- 3.52 The Reg 18 GNLP allocates more development to Village clusters than to Key Service Centres which is a counter intuitive approach to achieving sustainable development. We consider this matter should be addressed by allocating additional sites at Hethersett, with Pigeon being able to provide land for the development of new community facilities, over and above sites for new housing development.
- 3.53 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.

3.54 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.

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 site proposals at Hethersett includes new green infrastructure linkages thereby supporting the environmental objectives of Criteria 3. These linkages will provide for biodiversity enhancement and new wildlife corridors as well as providing new footpath connectivity integrating with the existing public right of way network for the benefit of both existing and new residents.

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 5

- 4.7 This Criteria identifies that the strategic gap policies will be used to ensure that landscape character is protected, and the supporting text in Table 8 suggests that this is the appropriate way to do this in the absence of a Green Belt in Greater Norwich.

- 4.8 It should be noted that Green Belt and the strategic gaps are not landscape designations and so the criteria does not actually fulfil the objective of the Policy. The criteria should therefore be amended to provide clarity as to whether the objective is to respect landscape characters or to provide a place-shaping tool as would be provided through the designation of Green Belt or whether both of these separate policy objectives are sought.

- 4.9 Paragraphs 331 and 337 of the GNLP suggests that the role of the strategic gaps is to prevent coalescence which is a place-shaping rather than landscaping policy. Therefore, it appears that the strategic gaps are being used as a replacement for Green Belt given that the GNLP acknowledges in Table 8 that there are no exceptional circumstances to justify the designation of Green Belt. The role of the strategic gaps must therefore be less restrictive than that which would be provided by a Green Belt. This is especially so where, as is the case with Land off Station Road, the designated area does not make any contribution to the separation of Hethersett and Norwich.

- 4.10 Even if it was appropriate to designate a proxy-Green Belt through the use of strategic gaps, paragraph 145 of the NPPF identifies that some development within a Green Belt can be appropriate and the same approach should be adopted in relation to strategic gaps. For example, where outdoor sports and outdoor recreation developments are proposed such as at Land off Burnthouse Lane, these would not be inappropriate in the Green Belt and so they would clearly not be inappropriate in a strategic gap.

- 4.11 However, the objective to respect landscape character is supported and this can be provided through landscape-led development at both Land off Station Road and Land off Burnthouse Lane, both of which contain generous areas of strategic landscaping and robust tree/shrub belts to ensure that these can be appropriately integrated into the surrounding landscape.
- 4.12 In respect of Land off Burnthouse Lane, it should also be noted that Colney Lane, which forms the eastern boundary of this parcel, forms a clearly defined boundary with an existing planting belt (approximately 20-25m wide) running along the eastern edge of Colney Lane. The existing planting belt and Colney Lane itself provide a more appropriate boundary to the strategic gap, with the agricultural fields to the east of Colney Lane providing separation between Hethersett and the A47 to the east (and Cringleford beyond).

Criteria 10

- 4.13 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);"*
- 4.14 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
- 4.15 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.

- 4.16 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.
- 4.17 The Alternative approaches section states that this target is a 'challenging but achievable requirement' and that to go beyond 20% would be unviable.
- 4.18 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'.
- 4.19 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'.
- 4.20 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

- 4.21 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.
- 4.22 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).

4.23 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

5

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. None were built in South Norfolk leaving a residual need for 679. 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 site at Land off Station Road, Hethersett offers a suitable location for such provision and provides sufficient scope to address a significant element of the residual need for bedspaces in a care home and/or sheltered/extra care accommodation within a care village.
- 5.15 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."
- 5.16 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.
- 5.17 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.

Self/Custom-Build

- 5.18 There does not appear to have been any assessment of the need for self/custom-build housing to justify the requirement in Policy 5 for 5% self/custom-build on sites of 40 or more homes.
- 5.19 The Councils have not published evidence to justify their policy requirement to self-build plots either with regard to the percentage of plots sought or the size of site from which they are to be sought. As written sites of 40 or more homes will be required to provide at least two plots as self/custom build.
- 5.20 Notwithstanding the above, concern is expressed that the policy as written is not adequately evidenced. The self-build register of each Council is not publicly available to validate the policy approach being pursued. Generally, many of those seeking to build their own homes wish to do so on plots in rural areas or

villages, not in urban locations, therefore there is no certainty over the delivery of the policy approach being proposed.

- 5.21 Therefore, it is considered that the requirement for the delivery of self-build plots should be specific to individual allocations to ensure that the needs will be met across the GNLP area and that these will be met at locations and at scales which are likely to be attractive to the self-build market. In addition, the policy could be expanded to allow self-build schemes to come forward where they are well related to settlement boundaries and have access to a range of services and facilities.

6. POLICY 6 – ECONOMY

- 6.1 Policy 6 proposes a number of employment allocations. However, these allocations do not necessarily reflect the balance of the workforce with the existing jobs, and therefore rely upon an increase in commuting flows between settlements.
- 6.2 By way of example, according to the 2011 Census, 2,268 residents of Hethersett were in work, but there were only 1,127 jobs in the settlement such that the remaining 1,141 or roughly half of residents were required to commute elsewhere for their work. The Joint Core Strategy then allocated an additional 1,000 homes at Hethersett and this is now proposed to increase to 1,369 homes in Policy HET1. The consequence of this is that the imbalance between the workforce and jobs within the settlement is likely to increase significantly which will mean that an even greater number of residents are required to commute to other settlements. This would appear to be directly contrary to paragraph 103 of the NPPF as it will increase the need to travel from Hethersett on a daily basis.
- 6.3 It is therefore considered that in settlements which experience such imbalances, appropriately sized employment allocations should be identified to accord with the NPPF and limit the need to travel. The Land off Melton Road, Hethersett provides an appropriate site to deliver additional jobs to address this imbalance and reduce the need to travel to work.

7. POLICIES 7.1-7.5 – THE SPATIAL STRATEGY

Policy 7.1 – Norwich Urban Area including the Fringe Parishes

- 7.1 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.
- 7.2 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.
- 7.3 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.
- 7.4 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.
- 7.5 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

- 7.6 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.
- 7.7 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.
- 7.8 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.
- 7.9 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.
- 7.10 Moreover the Reg 18 document highlights the uncertainty over the Britvic/Unilever Carrow Works site, this is the largest regeneration site shown in 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.
- 7.11 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.

- 7.12 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.
- 7.13 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.
- 7.14 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.
- 7.15 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.
- 7.16 We reserve 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 7.3 Key Service Centres

- 7.17 According to the GNLP, the Key Service Centres have a relatively good range of services, access to public transport and employment opportunities and play a

- vital role in serving the rural areas. It also identifies that these roles are intended to continue to be supported by appropriate levels of development.
- 7.18 Policy 7.3 identifies the growth to come forward at Key Service Centres in the plan period up to 2038. The Reg 18 GNLP identifies 3,253 homes and 11.79 hectares of employment land to come forward in the plan period across the Nine Key Service Centres.
- 7.19 Of the 3,253 homes to be allocated only 515 are new allocations with all other homes being derived from existing allocations or commitments.
- 7.20 Of particular concern is the fact that Hethersett is not identified for any additional allocations in the GNLP, other than an uplift at HET1 (which will not increase the rate of delivery but will simply elongate the development phase owing to be controlled by two housebuilders), despite being a Key Service Centre that provides a sustainable location where growth has previously been considered to be appropriate.
- 7.21 In failing to consider additional growth at such locations the Councils are missing opportunities provided by the Land at Hethersett to provide the required additional community facilities and a better range of uses at the Key Service Centres.
- 7.22 Land is proposed for a new educational campus at Land off Burnthouse Lane, Hethersett to provide a new primary school, thereby future proofing primary education in the village, and accommodation for Key Stage 3 students of Hethersett Academy, alleviating pressure on the existing school campus. This new campus will include a range of new recreation and sports facilities as well as providing the opportunity for new green infrastructure linkages for the benefit of existing and new residents alike. It is also proposed that a care home/care village will be provided to respond to the significant need for such accommodation across the GNLP area at Land off Station Road in close proximity to local services and with regular bus services to Norwich. The proposed provision of employment land will also be of significant benefit to the residents of Hethersett as it will enhance the opportunity for residents to be employed within the settlement and thereby reduce the need to travel.
- 7.23 In not providing an appropriate mix of uses through allocations at these locations the GNLP fails to provide flexibility and choice in the GNLP and risks the

- sustainability of the Key Service Centres as well as the timely delivery of market and affordable homes if allocated sites stall. Land at Hethersett is available and deliverable and provides not only for market and affordable homes but also for specialist accommodation to meet identified requirements.
- 7.24 The GNLP states that Hethersett is close to Norwich and within the Cambridge Norwich Tech Corridor. Paragraph 337 of the GNLP states the services and facilities that the settlement provides and the fact that it has good access to employment opportunities at a range of strategic and more local sites.
- 7.25 Land at Hethersett can provide for new market and affordable homes, new employment land, a new educational and sports campus and a new care home/care village. The attached Delivery Statement is based on technical evidence and clearly illustrates the sites and uses now promoted. We would welcome the opportunity to come and discuss these matters further with the Councils.
- 7.26 Whilst there is an existing allocation for the provision of 40 extra care units in Hethersett, this is insufficient given the identified need for 3,257 such homes across South Norfolk alone. Furthermore, following the allocation of this site in 2015, no planning application has been submitted in the subsequent 4 years which provides an indication that this site may not be attractive to the market or that there is a site-specific constraint which is acting as a barrier to development given the significant need for such accommodation.
- 7.27 The GNLP has not taken the opportunity that plan making provides to balance the delivery of new homes across the Key Service Centres and to consider how the delivery of new homes can also release land to provide new social and community infrastructure that the evidence base states is required at each settlement.

Policy 7.4 – Village Clusters

- 7.28 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.
- 7.29 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 for through 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.

- 7.30 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.

8. THE SITES PLAN

Introduction

- 8.1 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.
- 8.2 The opportunities provided by Land at Hethersett 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 Hethersett

- 8.3 Hethersett provides a range of community facilities including a GP surgery, primary schools, a secondary school, a library, a small business centre and a range of retail outlets and services. It benefits from regular bus services to Norwich; it is located on the Blue Pedalway cycleway and it is close to a Park and Ride facility. Hethersett is a highly sustainable settlement which is recognised as a Key Service Centre in the GNLP.
- 8.4 Hethersett has an existing mixed-use allocation which has planning permission for 1,169 homes, a primary school and local services which is currently under development by two housebuilders. The capacity of this existing allocation is proposed to be uplifted to 1,369 homes in the GNLP.
- 8.5 The delivery of this additional housing will be controlled by the same development interests and will not therefore increase the rate of delivery but instead elongate the development phase. In 2018/19, 93 completions were achieved on this site which accords with what would be expected from two delivery outlets. Assuming that this rate of broadly 100 per annum is maintained this site will contribute only 500 homes to the deliverable supply in any five-year period. However, if an alternative allocation was identified instead of or in addition to the proposed intensification of the existing allocation, this would increase the delivery rates and strengthen the five-year land supply position across the entire GNLP area. Furthermore, this would increase the range and choice of housing products available to households.

- 8.6 Furthermore, the existing allocation in combination with additional sites provide the opportunity to deliver a range of uses to meet the needs of the Hethersett and the broader GNLP area in a highly sustainable way, by ensuring that the necessary services and facilities are provided at the settlement including employment land to reduce the need to travel, additional education facilities to relieve the pressure on the existing schools, additional sports facilities to increase access for the community and accommodation to meet the needs of older people.
- 8.7 As identified above, in 2011 there was already a significant imbalance between the number of workers resident in Hethersett and the number of jobs such that a significant proportion of residents would have had no option but to commute out to access employment. This situation is likely to have significantly worsened in the interim given the additional housing which is and will be provided in Hethersett without a commensurate increase in jobs. In order that the need to travel from Hethersett is not exacerbated as the new housing is occupied, as required by paragraph 103 of the NPPF, it is therefore logical to provide additional opportunities within cycling and walking distance of residents such as that proposed at Land off Little Melton Road.
- 8.8 The Councils have identified that there is considerable pressure for pupil places in Hethersett in the Site Assessment Booklets. Whilst there are and will be improvements in school provision through the relocation of and expansion of one primary school and the expansion of the other as well as through the provision of land to expand the secondary school, it is understood that the schools will remain under significant pressure. This can be addressed through the allocation of Land off Burnthouse Lane which will provide land for a primary school, in order to future proof primary education, and a Key Stage 3 and Sports campus, the latter of which will relieve pressure on the existing secondary school campus.
- 8.9 Norfolk County Council has identified a need for 3,257 extra care homes across South Norfolk and the official projections identify a need for an additional 679 bedspaces for people aged 75 and over within South Norfolk. The GNLP recommends that some care provision is provided on allocations in Hethersett and Haleston within South Norfolk, but these are only proposed to provide a total of 340 homes not all of which will provide care. Therefore, the GNLP provides far too few homes for older people and it will be necessary to identify

- allocations to respond to this need. Furthermore, as identified above, the saved allocation for 40 extra care homes in Hethersett has not made any progress towards delivery and so does not appear to provide a reliable option to meet the needs of this section of the population. This need which is not being addressed can be responded to through the allocation of the Land off Station Road which provides the opportunity to deliver a significant number of bedspaces in a care home and/or a significant number of independent extra care (or similar) homes.
- 8.10 Nevertheless, notwithstanding the obvious sustainability credentials of Hethersett and the opportunities to increase the sustainability of the settlement, it is not proposed to provide anything other than additional residential development in the GNLP. As such, this will be provided without benefit to the deliverable supply.
- 8.11 The evidence-base does not provide any justification for the lack of allocations to meet the employment, educational and specific housing needs. The absence of any response to these needs is contrary to paragraphs 20a, 20c, 35a, 61, 84 and 103 of the NPPF.
- 8.12 The Land off Station Road, Land off Hethersett Road, Land off Little Melton Road and Land off Burnthouse Lane provide the opportunities to address these needs in sustainable locations as set out in the attached Delivery Statement.
- 8.13 The only constraints which have been identified within the evidence-base for any of these sites is that the Land off Little Melton Road is relatively remote from the settlement which is clearly incorrect.
- 8.14 The Land off Station Road is within a strategic gap, but this has not been identified within the evidence base as this site has not even been considered contrary to the specified methodology of the site selection process. However, the proposal at Land off Station Road does not erode or undermine the openness of the strategic gap owing to the fact that it does not encroach from Hethersett towards Norwich and the proposal is for a landscape-led scheme with significant areas of strategic landscaping including tree-planting which will integrate this development into the surrounding landscape.
- 8.15 Therefore, there are no constraints which cannot be satisfactorily addressed to justify the non-allocation of these sites, given that they are necessary to respond to pre-existing needs.

Site Assessment Booklet for Hethersett

8.16 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.

8.17 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.

8.18 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.

8.19 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

8.20 This Stage identified all of the potential alternative sites in each settlement, including the Land north, north-east, south-east and west of Hethersett.

8.21 The Land north, north-east, south-east and west of Hethersett (GNLP0177A and GNLP0177B) was submitted through the Call for Sites exercise and is identified in the Call for Sites Booklet of 2016 as including the entirety of the existing

- allocation HET 1, Land off Burnthouse Lane, Land off Station Road, Land off Little Melton Road and Land off Hethersett Road and large areas of other land.
- 8.22 The map at the end of the Site Assessment Booklet appears to contain a number of errors including the omission of the existing allocation HET 2 and the omission of large parts of GNLP0177A and GNLP0177B. It is assumed that these errors do not reflect the areas that have been assessed as that would mean that the methodology of the site-selection process has not been followed and that parts of the submitted sites have not been considered without any justification. The following representations therefore assume that the entirety of GNLP0177A and GNLP0177B have been considered in accordance with the identified methodology.
- 8.23 The Land north, north-east, south-east and west of Hethersett (GNLP0177A and GNLP0177B) appears to have been sub-divided into GNLP0177A, GNLP0177B, GNLP1023A and GNLP1023B prior to consideration.
- 8.24 GNLP0177A includes the Land off Burnthouse Lane, Land off Hethersett Road and the existing allocation HET1 as well as other land and was considered as having the potential to provide up to 3,000 dwellings. GNLP0177B includes Land off Station Road and other land and was considered as having the potential to provide commercial/employment land, supporting infrastructure, open space and a country park. GNLP1023A and GNLP1023B which include the Land off Little Melton Road was considered as having the potential to provide commercial (food-led business hub) land.
- 8.25 GNLP0177B, GNLP1023A and GNLP1023B were not assessed in the Site Assessment Booklet for Hethersett as they were not considered for residential uses. Instead these were considered in the separate Key Service Centres Non-Residential Assessment Booklet which is considered subsequently. The following paragraphs therefore only relate to GNLP0177A which was assessed for residential uses.
- 8.26 It is therefore apparent that the proposed development of a sports and education campus at Land off Burnthouse Lane, and the proposed development of a care home/care village at Land off Station Road were not considered within the site selection process. It is unclear whether this different mix of uses would have resulted in these parts of the site being proposed for allocation.

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

- 8.27 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.
- 8.28 The Site Assessment Booklet summarises the HELAA assessment on page 4. However, for GNLP0177A this summary does not accord with the assessment contained in the HELAA. The Site Assessment indicates that this site is categorised as 'red' in terms of Flood Risk and Historic Environment when the HELAA actually categorised this site as being 'amber' in terms of Flood Risk and 'green' in terms of the Historic Environment. Similarly, the Site Assessment Booklet indicates that this site is categorised a 'amber' under Sensitive Townscapes when the HELAA actually categorised this site as 'green'. It is therefore apparent that the summary of the HELAA contained in the Site Assessment Booklet is incorrect and suggests that GNLP0177A has more significant constraints than the evidence actually identifies.
- 8.29 The HELAA correctly concluded that GNLP0177A was suitable for development and the Site Assessment Booklet does not suggest otherwise notwithstanding the errors within this document.

Stage 3 - Summary of the consultation comments

- 8.30 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.
- 8.31 As recorded in the Site Assessment Booklet for Hethersett, comments were received in support of the development of GNLP0177A (and GNLP0177B). However, objections were also received relating to the proposed scale of the development, the pressure this would place on existing services and the potential impacts on County Wildlife Sites.

Stage 4 - Discussion of submitted sites

- 8.32 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.

- 8.33 The assessment identifies that the scale of the area beyond the existing allocation far exceeds the likely housing requirement to be provided in Hethersett but that parts may be suitable. This accords with the Concept Plan and Delivery Statement which accompany these representations which do not propose the entirety of the land for residential development but instead propose to deliver complementary uses including a sports and education campus and significant areas of green infrastructure within GNLP0177A at Land off Burnthouse Lane and Land off Hethersett Road.

Stage 5 - Shortlist of reasonable alternative sites for further assessment

- 8.34 The reasonable alternative sites were then shortlisted in Stage 5 including GNLP0177A.

Stage 6 - Detailed site assessments of reasonable alternative sites

- 8.35 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.
- 8.36 This further assessment identifies that it is likely that mitigation could be found for the known constraints given the scale of the site. Highways, Minerals and Waste, and the Lead Local Flood Authority did not raise any concerns with the development of GNLP0177A.
- 8.37 Development Management Officers indicated that as the existing allocation was likely to be increased by circa 200 homes there would not be a need for any additional growth. This rather undermines the whole site selection process as it relies upon the site selection process selecting an intensification of the existing

allocation to justify selecting an intensification of the existing allocation. This fundamentally undermines the integrity of the process.

- 8.38 Children's Services identify that there is a need for new school provision and that without this Hethersett would not be able to accommodate further growth. This demonstrates the necessity for the allocation at Land off Burnthouse Lane which is proposed to provide land for a new primary school, to future proof primary education in the village, and land for a Key Stage 3 campus of Hethersett Academy, thereby relieving pressure on the existing campus.

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

- 8.39 At Stage 7, the site selection process concludes that GNLP0177A is a reasonable alternative and that the part of this within the existing allocation HET 1 should be allocated for an additional 200 homes.
- 8.40 However, this part of the GNLP0177A has not been assessed in isolation and there is therefore no justification for selecting this part of the site in preference to any other. The intensification of the existing allocation has not been assessed and considered in comparison to other potential residential sites within GNLP0177A which may offer more sustainable and/or less constrained locations for additional development. There is also no evidence as to the impact that this proposed intensification will have on the existing and planned infrastructure which is already under development as part of the existing allocation, compared to the impacts of any other potential residential site within GNLP0177A.
- 8.41 Furthermore, the proposed intensification of the existing allocation does not address the constraints which have been identified throughout the site selection process including the need for a new school to accommodate any additional development such as that proposed. This issue can only be addressed through the allocation of Land off Burnthouse Lane.

Key Service Centres Non-Residential Assessment Booklet

- 8.42 As identified above, some parts of the Land north, north-east, south-east and west of Hethersett (GNLP0177B, GNLP1023A and GNLP1023B) were assessed for non-residential uses. This follows the same staged process as adopted in the Site Assessment Booklets as described below.

Stage 1 - List of sites promoted in the settlement

- 8.43 The Non-Residential Assessment Booklet identifies that GNLP1023A and GNLP1023B which comprise the Land off Little Melton Road were assessed for food-led industrial uses and that GNLP0177BR was assessed for the provision of outdoor leisure, residential care, assisted living and renewable energy generation.
- 8.44 GNLP0177NR is an entirely new reference number and from the mapping within the Non-Residential Assessment Booklet it appears to consist of part of GNLP0177B with certain parts including Land off Station Road excluded. The Introduction and Methodology report of the site selection process identifies that "Stage 1 is a complete list of all the sites promoted in each settlement/cluster". There is no justification for excluding parts of GNLP0177B from consideration and this is directly contrary to the identified methodology.
- 8.45 It will therefore be necessary to assess the residual parts of GNLP0177B which have been excluded from GNLP0177BR including the Land off Station Road to accord with the methodology and to ensure that all reasonable alternatives have been assessed. The attached Delivery Statement identifies the development proposed and the evidence in support of the Land off Station Road which should be taken into account within the assessment when this is undertaken.

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

- 8.46 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.
- 8.47 The Non-Residential Assessment Booklet summarises the HELAA assessment. However, for GNLP0177BR this summary does not accord with the assessment of GNLP0177B contained in the HELAA. This discrepancy is presumably explained by the fact that GNLP0177BR excludes parts of GNLP0177B. It is noteworthy that as a result of the exclusion of parts of GNLP0177B including Land off Station Road, the Non-Residential Assessment Booklet suggests that GNLP0177BR performs less well than GNLP0177B. This would suggest that there are fewer constraints on the parts of GNLP0177B which are not assessed including Land off Station Road.

8.48 For Land off Little Melton Road (GNLP1023A and GNLP1023B) the HELAA is correctly summarised in the Non-Residential Assessment Booklet.

8.49 The HELAA correctly records that both GNLP0177B which includes the Land off Station Road and GNLP1023A and GNLP1023B which comprises Land off Little Melton Road are suitable for development.

Stage 3 - Summary of the consultation comments

8.50 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.

8.51 Objections were received in relation to Land off Little Melton Road (GNLP1023A and GNLP1023B) relating to the loss of walking routes, traffic congestion, a lack of exercise facilities and additional pollution.

8.52 Comments were received in support of GNLP0177BR relating to the benefits of providing employment space, notwithstanding that the provision of employment land was not considered on this site; and to the encroachment between Hethersett and Norwich. Whilst encroachment would occur from the development of GNLP0177BR, the same would not be true of the development of the Land off Station Road within GNLP0177B (had this been assessed) which represents a southern extension from Hethersett which does not encroach towards Norwich.

Stage 4 - Discussion of submitted sites

8.53 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.

8.54 The assessment identifies that the Land off Little Melton Road (GNLP1023A and GNLP1023B) is in a relatively remote location and that it is not required given

- the significant existing commitment for strategic employment land. It is therefore dismissed from further consideration.
- 8.55 However, the Land off Little Melton Road is actually within very close proximity of the existing built form of allocation HET 1 and so cannot be described as being reasonably remote. Whilst the GNLP identifies that there is a sufficient supply of employment land across the plan area, there was a significant shortfall in employment opportunities within Hethersett in 2011 and this is likely to have significantly worsened in the intervening years given the residential-led development of HET 1 without a corresponding increase in employment opportunities. Therefore, whilst there may be a sufficient supply of employment land, provision of employment land in Hethersett presents a significant opportunity to further limit the need to travel as required by paragraph 103 of the NPPF.
- 8.56 Therefore, the justifications for discounting the Land off Little Melton Road (GNLP1023A and GNLP1023B) from further consideration are factually inaccurate and rely upon a distribution which does not fulfil the objectives of national policy.
- 8.57 The assessment identifies that GNLP0177BR, which excludes the Land off Station Road, as being subject to constraints including the relationship to the heritage asset of Thickthorn Hall, a strategic gap and a landscape protection zone and on this basis discounts this site from further consideration.
- 8.58 The Land off Station Road is not considered to affect the setting of Thickthorn Hall nor is it within the landscape protection zone and so had this part of GNLP0177 been considered in accordance with the methodology it would not have been discounted for these reasons. Whilst Land off Station Road is located within the identified strategic gap, as identified in the South Norfolk Site Specific Allocations and Policies Document, the purpose of this strategic gap is to maintain the separation between Hethersett and Norwich to the east. The Land off Station Road represents a southern extension to Hethersett which does not encroach towards Norwich. It is therefore unclear why the Land off Station Road is designated as a strategic gap. Nevertheless, Policy DM 4.7 of the South Norfolk Development Management Policies Document identifies that development will be permitted in the strategic gap where it would not erode or otherwise undermine the openness of the strategic gap. The proposed development of Land off Station Road would not erode or undermine the

strategic gap both because it would not result in encroachment towards Norwich and because a landscape led approach is proposed with significant areas of strategic landscaping including tree planting to ensure that the openness of the strategic gap would be maintained.

- 8.59 Therefore, had the Land off Station Road been considered in the site selection process, it is considered that it would not have been discounted as the remainder of GNLP0177 has been.

Stage 5 - Shortlist of reasonable alternative sites for further assessment

- 8.60 No reasonable alternatives for any non-residential uses in Key Service Centres are identified, notwithstanding that these proposals, including those at Land off Station Road and Land off Little Melton Road provide unconstrained opportunities to address identified needs and to rebalance communities.

Stage 6 - Detailed site assessments of reasonable alternative sites

- 8.61 As no reasonable alternatives have been identified, this Stage provides an overview as to why each of the potential sites has been discounted.
- 8.62 The identified justification for not allocating the Land off Little Melton Road (GNLP1023A and GNLP1023B) is that there is a sufficient supply of employment land across the GNLP area and so this is not required. However, no consideration has been given to the distribution of the identified employment land supply. Hethersett has a particular imbalance which can be addressed at least in part through the provision of additional employment opportunities within the village, which will not only provide benefit to local residents as they will be able to access work locally, it provides the opportunity to reduce traffic congestion as more people will be able to walk or cycle to work and it provides the opportunity to reduce the distance travelled. No site-specific constraints have been identified which would act as a constraint on the development of this site. In order to rebalance the community and reduce the need to travel as required by the NPPF it is considered that it is necessary to allocate additional employment land at Hethersett including at Land off Little Melton Road.
- 8.63 In relation to GNLP0177BR which excludes Land off Station Road, the same constraints as identified in Stage 4 are identified. These either do not affect or can be appropriately addressed through the development of Land off Station Road such that had this been considered in accordance with the identified

methodology it is considered that this would have been identified as a reasonable alternative, and given the overwhelming need for housing to meet the needs of the older population which is not being addressed within the GNLP it is likely that this would have been proposed for allocation.

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

- 8.64 A Sustainability Appraisal (SA) has been carried out in support of the GNLP. This assesses the western part of Land off Little Melton Road (GNLP1023A) (despite the fact that this was discounted as a reasonable alternative in the Non Residential Assessment Booklet) and the part of the Land north, north-east, south-east and west of Hethersett, which includes Land off Hethersett Road and Land off Burnthouse Lane and was assessed as providing a reasonable alternative (GNLP0177A).
- 8.65 The SA assesses GNLP0177A as having potential for up to 3,000 dwellings without any consideration of the opportunities for a sports and education campus as proposed at the Land off Burnthouse Lane.
- 8.66 The SA assesses GNLP1023A as having the potential for food-led industrial uses which accords with the Concept Plan for this site. The SA assesses GNLP1023A as being at least as if not more sustainable under every objective of the SA than any other proposal (including residential proposals) in Hethersett with two exceptions. The two exceptions relate to objectives 5 and 6, namely housing and population and communities. Given that this site is not proposed for residential development it will not deliver housing and as such the accessibility of this site to a convenience store is somewhat irrelevant. The SA therefore illustrates that this site is sustainable for development.
- 8.67 The assessment of GNLP0177A is however more complicated and so is addressed in detail below.
- 8.68 SA Objectives 1 – Air Quality and Noise - the SA identifies that owing to scale of the residential development considered, GNLP0177A would have a major negative impact. However, much of this is attributable to the existing development contained within GNLP0177. This finding would not however be applicable to Land off Burnthouse Lane which proposes to deliver a sports and

- education campus, significant areas of green infrastructure, alongside around 50 new homes.
- 8.69 SA Objective 2 – Climate Change Mitigation and Adaptation – as above, the SA identifies that owing to scale of the residential development considered, GNLP0177A would have a major negative impact. This will in large part be attributable to the existing development contained within GNLP0177 and so does not provide an assessment of the options that are being considered namely the various ways in which additional residential development could be provided at Hethersett but within GNLP0177A. The conclusion of the assessment of residential development only would also not be applicable to the Land off Burnthouse Lane, which includes a sports and education campus along with significant areas of green infrastructure, alongside around 50 new homes.
- 8.70 Therefore, had the SA assessed the individual proposals within GNLP0177A rather than considering this as a single entirely residential proposal, then some of these, including Land off Burnthouse Lane would have performed more favourably than identified in the SA.
- 8.71 SA Objective 3 – Biodiversity, Geodiversity and Green Infrastructure – the SA again applies a sweeping assessment of the entirety of GNLP0177A and concludes that this, if delivered in its entirety for residential uses, would have a minor negative impact. No assessment is undertaken of the impacts of the individual proposals within GNLP0177A such as at Land off Hethersett Road or Land off Burnthouse Lane.
- 8.72 SA Objective 4 – Landscape – the SA indicates that all of the residential sites in Hethersett including GNLP0177A will have a minor negative impact under this objective.
- 8.73 The attached Concept Plans demonstrate that in relation to Land off Burnthouse Lane and Land off Hethersett Road, high-quality landscape-led schemes are proposed within generous areas of strategic landscaping and green infrastructure which will integrate these schemes with the surrounding landscape.
- 8.74 SA Objective 5 – Housing – the SA indicates that GNLP0177A will have a major positive impact under this objective. The Land off Hethersett Road would have such a major positive impact, including as a result of the opportunities to provide

- a range of tenures, types and sizes of housing to respond to the needs of the community. The positive impacts which arise from the allocation of the Land off Hethersett Road would be greater than those which would arise from the intensification of the existing allocation as it would introduce additional development outlets to the settlement that would increase the rate of housebuilding and thereby strengthen the five-year land supply position of the Councils and meet housing needs in a timely fashion.
- 8.75 The potential positive effects of development at the Land off Station Road, which has not been considered at all, would be even more pronounced given the proposal to deliver a care home/care village to respond to the specific needs of the older population.
- 8.76 SA Objective 6 – Population and Communities – The SA assesses GNLP0177A as having a major negative impact under this objective owing to being beyond 600m from the nearest convenience store. However, it does not take account of the fact that the existing development provides for additional retail floorspace potentially including new convenience stores and that had this been taken into account the SA may have reached different conclusions.
- 8.77 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.
- 8.78 SA Objective 8 – Health – the SA assesses GNLP0177A as being partially over 600m from a greenspace. However, this takes no account of the fact that significant areas of greenspace are proposed throughout GNLP0177A including at Land off Burnthouse Lane and Land off Hethersett Road such that these should not be assessed as having a minor negative impact in this regard.
- 8.79 The SA also assesses GNLP0177A as being more than 800m from the nearest GP surgery. Whilst this may be true of parts of GNLP0177A it does not apply to Land at Hethersett Road which is proposed for residential development within the identified walking distance of Hethersett Surgery.
- 8.80 Therefore, as a result of GNLP0177A being assessed as a single entity, some parts of the site have been assessed less favourably.

- 8.81 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.
- 8.82 SA Objective 10 – Education – the SA assesses GNLP0177A as having a major negative impact owing to the distance to primary and secondary schools across some of the site. This identified constraint would be addressed for much of the existing allocation through the provision of a new primary school and the Key Stage 3 campus proposed at Land off Burnthouse Lane. The SA does not therefore take account of the positive impacts that the proposed developments could have to address existing deficits.
- 8.83 SA Objective 11 – Economy – the SA assesses GNLP0177A as having a major positive impact on the economy, owing to the fact that they are within 5km of Norfolk and Norwich University Hospital which provides employment opportunities and because it includes commercial and employment uses. However, it is still necessary to travel at least 3 miles to access the employment opportunities at Norfolk and Norwich University Hospital and the commercial and employment uses provided on site total 1,850m² which will provide relatively few additional jobs. The opportunities provided by Land off Little Melton Road (GNLP1023) would have a far greater positive impact by providing a comparatively large number of jobs within the settlement.
- 8.84 The SA assesses GNLP0177A as performing well in relation to the economy as it provides employment opportunities in Hethersett, notwithstanding the fact that the adjacent site at Land off Little Melton Road (GNLP1023) is not regarded as a reasonable alternative as there is no need for additional employment across the GNLP area. This is a perverse conclusion.
- 8.85 SA Objective 12 – Transport and Access to Services – the SA assesses that GNLP0177A will have a minor negative impact under this objective including because parts of the site are beyond 400m from the nearest bus stop. This does not apply to all parts of the site and does not take account of the opportunities to improve public transport provision through the development.
- 8.86 Whilst the Land off Station Road is not assessed (as it forms a part of GNLP0177B which is not assessed), this is in very close proximity to the nearest bus stop with regular services to Norwich providing an ideal location for the provision of a care home/care village with strong public transport connections.

- 8.87 SA Objective 13 – Historic Environment – the SA assesses GNLP0177A as having a major negative impact under this objective owing to its relationship to the setting of Listed Buildings including the Church of All Saints, Remains of the Church of St Mary, Hill Farmhouse, The Hollies, Cedar Grange, and those in Little Melton. Whilst parts of GNLP0177A may be relatively close to these heritage assets that does not mean that they will necessarily affect the settings of the assets.
- 8.88 The Land off Burnthouse Lane is not considered to affect the setting of any heritage asset. The area proposed for residential development at Land off Hethersett Road, whilst adjacent to Hill Farmhouse, is screened from the asset and the proposal will include significant areas of greenspace which will preserve the setting of Hill Farmhouse.
- 8.89 The SA by taking such a broad-brush approach to the assessment of sites does not take into account the impacts which arise from each individual proposal within GNLP0177A.
- 8.90 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.
- 8.91 The SA also suggests that the use of previously undeveloped land would necessarily be an inefficient use of 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.
- 8.92 SA Objective 15 – Water – the SA assesses all of the sites in Hethersett, and the majority across the GNLP area as providing a minor negative impact under this objective.
- 8.93 In summary in relation to GNLP1023A, the SA has correctly identified that GNLP1023A offers a sustainable location for development notwithstanding that the site selection process has identified that this is not even a reasonable alternative. In terms of GNLP0177A, the SA has assessed a proposal which does not exist, namely the delivery of the entire site including the existing allocation, for residential purposes notwithstanding that different parts of the site have

different proposals for different land-uses and will be subject to different constraints. The SA does not therefore provide any assessment of the opportunities provided on the various parts of GNLP0177A.

Conclusions on the Sites Plan

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

- Some sites, including GNLP0177A, have been assessed as being developed entirely for residential uses within the Site Assessment Booklet and the SA, notwithstanding that other uses are proposed across large elements of the site;
- It is internally inconsistent as the SA demonstrates that sites including GNLP1023A offer a highly sustainable location for sustainable development notwithstanding that the Non-Residential Assessment Booklet has identified that this does not even offer a reasonable alternative for development;
- Some sites which were submitted for consideration have not been assessed at all, including the Land off Station Road, contrary to the identified methodology of the Site Assessment Booklet and without justification;
- Many of the conclusions reached have been affected by the consideration of a proposal which was not and is not being advanced namely an entirely residential development across GNLP0177A;
- Many of the conclusions reached do not take account of the proposals and constraints within individual schemes as a result of considering GNLP0177A as a single development;
- The Site Assessment Booklet seeks to justify conclusions that have already been reached rather than taking an evidence-based approach by assuming that the existing allocation will be intensified to conclude that the existing allocation should be intensified;

- It assumes that infrastructure constraints act as a barrier to development rather than seeking to identify whether these can be addressed through new development for the benefit of all including the provision of employment land to address the existing imbalance of jobs and workers, and educational facilities to relieve the identified pressure on pupil places, as proposed at the Land off Little Melton Road and Land off Burnthouse Lane;
- The Non-Residential Assessment Booklet relies upon conclusions which are factually incorrect to discount sites, such as identifying that the Land off Little Melton Road is reasonably remote;
- Neither the SA nor the Site Assessment Booklet assess the sustainability of the allocation (or intensification of the existing allocation) which is actually proposed and therefore there is no justification for selecting this in preference to other parts of the GNLP0177A;
- 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 off Hethersett Road, Land off Burnthouse Lane, Land off Station Road and Land off Little Melton Road can all be sustainably delivered.

8.95 Pigeon would welcome the opportunity to meet with officers to discuss the opportunities which can be provided through the delivery of Land at Hethersett.