

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

**ON BEHALF OF: PIGEON INVESTMENT MANAGEMENT LIMITED
LAND AT DEREHAM ROAD, REEPHAM**

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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 for Pigeon Investment Management Limited ('Pigeon') on behalf of Michael and Jackie Buxton ('the Landowners') and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham.
- 1.2 The Land at Dereham Road, Reepham provides the opportunity for a landscaped scheme to provide the preferred site for the relocation of an existing local employer and land for the extension of the existing GP surgery (on land north of Dereham Road), and around 50 homes including bungalows, affordable housing and self-build homes (on land south of Dereham Road).
- 1.3 The following representations address the Vision and Objectives, Policies 1, 2, 4, 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 Dereham Road 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 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, which in addition to the minimum housing need for circa 42,400 homes produce a housing requirement for at least 46,216 homes.

Contingency to respond to changes

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

Employment Land Requirement

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

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

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

The approach to five-year land supply

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

Spatial Strategy

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

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

- with an associated reduction in the percentage to be delivered in Norwich urban area and the Village Clusters.
- 3.48 Additionally, we have concerns over the fact that more dwellings are proposed in the spatial strategy across Village Clusters than are allocated at Key Service Centres, including a minimum of 1,200 dwellings through a South Norfolk Village Clusters Housing Site Allocations Development Plan Document.
- 3.49 Without certainty over the supply of land to deliver such a quantum of development in South Norfolk Village Clusters the soundness of the spatial strategy is questionable. As a percentage of the overall new housing allocations in the Reg 18 GNLP the current spatial strategy delegates approximately 15% to a document outside of its control (1200/7,840). This is not considered to be a reasonable approach and prejudices the delivery of the emerging GNLP by 2038.
- 3.50 A Settlement Hierarchy approach to the distribution of development would look to allocate a higher percentage of housing to more sustainable locations with smaller amounts being allocated to lower order settlements in recognition that small developments at villages can help maintain service provision, provide vitality and help address local market and affordable housing needs.
- 3.51 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 Reepham, with Pigeon being able to provide land for the development of new community facilities including healthcare, over and above sites for new housing development.
- 3.52 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.
- 3.53 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 Reepham 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 10

- 4.7 This Criteria contains the following bullet point;

"All new development will provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016);"

- 4.8 The Planning Practice Guidance states that;

"The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability." PPG Climate Change – Paragraph: 009 Reference ID: 6-009-20150327 Last revised 27th March 2015

- 4.9 PPG Paragraph: 012 Reference ID: 6-012-20190315, last revised 15th March 2019, states that Local Plans can set energy efficiency standards that exceed the energy efficiency requirements of the Building Regs, it also states that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the code for Sustainable Homes – which is identified as approximately 20% above current Building Regs across the build mix. The PPG also requires such policy requirements to be viable.

- 4.10 The Code for Sustainable Homes was withdrawn in 2015 and replaced by technical housing standards. The GNLP Reg 18 has chosen to continue to pursue the '20% above Building Regs' approach at criteria 10 of Policy 2.

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

Master planning

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

application stage should masterplan amendments be required as a result of statutory and internal local authority consultations post submission.

5. POLICY 4 – STRATEGIC INFRASTRUCTURE

- 5.1 Policy 4 facilitates the Vision and Objectives of the GNLP by supporting the delivery of strategic infrastructure to meet the needs of the area. This ambition is to be welcomed. However, the GNLP is largely silent upon how this strategic infrastructure will be delivered and, in some cases, the GNLP does not make provision for this required infrastructure as described below.
- 5.2 Policy 4 also identifies that the authorities will lobby for the delivery of infrastructure including in the health care sector. Whilst any lobbying is to be welcomed, this does not provide for an effective policy to guide development. The wording should be revised to indicate that proposals that assist the delivery of infrastructure improvements will be supported.
- 5.3 The Infrastructure Needs Report demonstrates the particular importance of the delivery of healthcare infrastructure in a number of areas, including at Reepham and Aylsham where the medical practice is of an insufficient size to accommodate the number of registered patients.
- 5.4 The medical practice at Reepham can be readily expanded through the allocation of the site at Land at Dereham Road, Reepham with provision of land for the extension of the existing facility as detailed in the Delivery Statement and Concept Plan that accompany these representations.

6. POLICY 5 – HOMES

6.1 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

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

6.3 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'.

6.4 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.

6.5 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.

6.6 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.

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

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

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

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

Accessible and Specialist Housing

- 6.8 The Policy then proceeds to support the delivery of accessible and specialist housing providing they have good access to local services which is welcomed.
- 6.9 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.
- 6.10 There is a need for 1,081 bedspaces in Broadland, 57 in Norwich and 679 in South Norfolk over the plan period. In 2018/19, 8 were built in Broadland leaving a residual need for 1,072 and 83 were built in Norwich meaning that there is no residual need in this LPA. In order to ensure that these needs are addressed it would therefore be appropriate to allocate sites in both Broadland and South Norfolk to meet these needs.
- 6.11 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.
- 6.12 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.
- 6.13 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.
- 6.14 The Policy requires proposals for major housing development to provide;

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

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

Self/Custom-Build

- 6.17 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.
- 6.18 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.
- 6.19 Pigeon are supportive of providing self-build plots and their proposals at Reepham allow for such development.
- 6.20 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.

- 6.21 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.

7. POLICY 6 – ECONOMY

7.1 Policy 6 proposes a number of employment allocations. However, these allocations do not necessarily reflect the needs of individual communities.

7.2 For example, where an employer with a particular connection to a settlement has identified a need to relocate to more suitable premises, provision should be made for this relocation to occur at the settlement through the allocation of an appropriate site. This circumstance exists at Reepham where a significant local employer engaged in the tourism industry has identified a need for new premises to allow for the continued successful operation and expansion of their business.

8. POLICIES 7.1-7.5 – THE SPATIAL STRATEGY

Policy 7.1 – Norwich Urban Area including the Fringe Parishes

- 8.1 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.
- 8.2 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.
- 8.3 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.
- 8.4 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.
- 8.5 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

- 8.6 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.
- 8.7 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.
- 8.8 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.
- 8.9 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.
- 8.10 Moreover the Reg 18 document highlights the uncertainty over the Britvic/Unilever Carrow Works site, this is the largest regeneration site shown in the Key Diagram (Map 9) for the east Norwich Strategic Growth Area, therefore assumptions made over the quantum of housing to be delivered from this brownfield source should be questioned until there is further clarity over the availability of the site. To that end the emerging GNLP should not place an over reliance on the new East Norwich allocation (1,200 homes) and should look to other sources of supply to meet its housing requirements.
- 8.11 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.

- 8.12 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.
- 8.13 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.
- 8.14 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.
- 8.15 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.
- 8.16 Our client reserves the right to comment further at Regulation 19 once housing trajectories are published, on the deliverability of sites and the associated soundness of the plan.

Policy 7.3 Key Service Centres

- 8.17 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 supported by appropriate levels of development.
- 8.18 However, many are planned to receive disproportionately low levels of development owing to a range of factors. Such constrained rates of growth are likely to compromise the role that these settlements play. In order to support such an unsustainable strategy, it would need to be demonstrated that the constraints identified by the Councils cannot be satisfactorily addressed rather than allowing the sustainability of these settlements to be compromised.
- 8.19 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.
- 8.20 Of the 3,253 homes to be allocated only 515 are new allocations with all other homes being derived from existing allocations or commitments.
- 8.21 In particular, the Key Service Centre of Reepham is proposed to receive no additional growth beyond the 142 homes which are currently committed. This represents 13% of the dwelling stock at 2011 and provides for one of the lowest proportional rates of growth of any of the Key Service Centres. It is therefore apparent that the GNLP is likely to compromise the vitality of Reepham.
- 8.22 Reepham is well located to receive new development including expansion of the doctor's surgery which can be provided for by the provision of land to facilitate future expansion on Land north of Dereham Road in association with new employment development to meet the existing needs of a local firm providing support to the leisure industry across the wider area.
- 8.23 In failing to consider additional growth at such locations the Councils are missing opportunities provided by our client to provide the required additional community facilities identified in the GNLP Infrastructure Study at the Key Service Centres.
- 8.24 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

- 8.25 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.
- 8.26 Village Clusters are by definition less sustainable locations for growth and accordingly it would be expected that development would be restricted to that necessary to support rural or local needs. However, the GNLP seeks to direct more development to such settlements than to Key Service Centres which have a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas according to paragraph 333 of the GNLP. Similarly, paragraph 308 identifies that the Main Towns serve the wider hinterlands including these Village Clusters. This would suggest that the needs of rural areas would be more sustainably provided thorough development at the Key Service Centres and Main Towns contrary to the strategy proposed in the GNLP. The GNLP strategy is even less sustainable, given that development at the Key Service Centres and Main Towns provides the opportunity to enhance community facilities which serve the rural areas.
- 8.27 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.

9. THE SITES PLAN

Introduction

9.1 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.

9.2 The opportunities provided from the development of the site at Land at Dereham Road, Reepham 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 Dereham Road, Reepham

9.3 Reepham provides a comprehensive range of community facilities including a GP surgery, nursery school, primary school, high school, town hall, library and a range of retail outlets and services. Reepham is a highly sustainable settlement which is recognised as a Key Service Centre in the GNLP.

9.4 Nevertheless, notwithstanding the obvious sustainability credentials of Reepham to accommodate additional growth, the GNLP does not propose to allocate any sites at the settlement which means that it will receive a disproportionately low level of growth. This could compromise the vitality and viability of existing facilities.

9.5 Furthermore, there are a number of pre-existing issues within Reepham which adversely affect the sustainability of the settlement which should be addressed through the GNLP in accordance with paragraph 20c of the NPPF. For example, the Infrastructure Needs Report identifies that there is insufficient floorspace in the existing GP surgery to accommodate the number of registered patients but the opportunities to address this have not been taken into account when determining whether additional allocations should be made at Reepham.

9.6 Similarly, a significant local employer has identified that their existing premises is limiting their ability to operate successfully, and they are looking to relocate to a new site within the town to provide the opportunity for the business to potentially expand. The GNLP does not provide any mechanism or allocation to support this relocation which will be key to maintaining the local economy.

- 9.7 Rather than seeking to allocate sites to respond to these identified needs as required by paragraphs 20a and 20c of the NPPF, the GNLP suggests that there are already a sufficient number of commitments within Reepham and proposes no additional allocations notwithstanding that the existing commitments do not address the identified needs. This approach is even more surprising given that the proposed level of growth in Reepham is disproportionately low compared to almost every other Key Service Centre.
- 9.8 The GNLP seeks to justify the absence of allocations at Reepham based on site specific constraints relating to highways, access to sites and landscape, without undertaking a more detailed assessment to discern whether these can be suitably mitigated to support the sustainability of Reepham by addressing the identified needs.
- 9.9 The site specific constraints identified in Stage 7 of the Site Assessment Booklet in relation to the Land at Dereham Road which provides both the preferred relocation site for the existing employer and land for the expansion of the existing surgery and thereby provides the only option to address both of the identified needs, are identified as relating to the capacity of footway connections to the town centre and the ability to accommodate appropriate visibility splays.
- 9.10 Pigeon has engaged with the local highway authority and it has been identified that with appropriate mitigation, safe pedestrian connectivity can be provided between the surgery and the town centre to the benefit of the community. Traffic surveys have also been undertaken which demonstrate that suitable visibility splays can be provided on-site (as shown on the Access Strategy Plan contained within the accompanying Delivery Statement). Therefore, there are ready solutions to the identified constraints such that the Land at Dereham Road should be identified as an allocation in the GNLP given the significant role it will play in securing the continued sustainability of the Key Service Centre of Reepham.
- 9.11 The relocation of the existing employer is also likely to relieve the pressure on parking spaces in the town centre as it will divert workers from the town centre to the Site.
- 9.12 The Concept Plans in support of the Land at Dereham Road have been designed to provide high-quality landscape-led schemes with new open space and tree planting to integrate them into the existing landscape. The Concept Plan for Land

south of Dereham Road also proposes 50 homes including bungalows, affordable housing and self-build homes to respond to a range of housing needs.

- 9.13 Therefore, the Land at Dereham Road not only provides a sustainable development in its own right, it also provides betterment to the town by providing the opportunity to address existing infrastructure issues, supporting the local economy, mitigating existing access issues and meeting housing needs.

Site Assessment Booklets

- 9.14 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.

- 9.15 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.

- 9.16 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.

- 9.17 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

- 9.18 This Stage identified all of the potential alternative sites in each settlement, including the Land at Dereham Road, Reepham.
- 9.19 However, the Land at Dereham Road was considered for a residential development of 100-200 dwellings and the potential expansion of the doctors surgery throughout the site-selection process rather than as a mixed-use development including around 50 homes, land for the expansion of the doctors surgery and a site for the relocation of an existing employer as proposed in the attached Delivery Statement. It is unclear whether this different mix of uses would have resulted in the site being proposed for allocation.

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

- 9.20 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.
- 9.21 The HELAA concludes that the Land at Dereham Road, Reepham is suitable for development.

Stage 3 - Summary of the consultation comments

- 9.22 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.
- 9.23 As recorded in the Site Assessment Booklet for Reepham, comments were received in support of the development of Land at Dereham Road, Reepham taking account of the opportunities to deliver housing suitable for the elderly in close proximity to the doctor's surgery and to reconfigure the parking arrangements at the surgery. However, objections were also received in relation to traffic congestion, pollution, road safety, loss of rural environment, added pressure on services, lack of public transport and limited sewerage capacity.
- 9.24 As identified in the attached Delivery Statement, these constraints either do not exist, will be improved through the proposed development or can be addressed through appropriate design. In particular:

- Traffic Surveys have demonstrated that there is sufficient capacity on the highway network to accommodate the proposed scheme.
- The operational impact of the scheme on existing air quality receptors in the local area is predicted to be negligible.
- The proposed traffic calming measures will improve highway safety.
- The proposed development will be contained within a strong landscape structure with appropriate landscaping.
- Existing services and facilities are likely to benefit from increased patronage.
- Discussions are ongoing with Anglian Water, but it is not anticipated that significant reinforcement works will be required to accommodate the scheme.

9.25 Furthermore, no consideration appears to have been given to the enhancements which can be provided as part of any potential development. For example, the Concept Plan for Land north of Dereham Road, Reepham proposes to deliver a site to ensure that a local employer that employs 110 people is able to remain in the town having outgrown their existing premises and provides the opportunity not only for this employer to continue trading but to expand their operations. This could limit the need to travel as there will be the opportunity for residents to be able to access employment within walking distance of their home and it is also likely to relieve the pressure on car parking spaces in the town centre where the current premises are. The Concept Plan for Land north of Dereham Road also proposes to provide land to enable the much-needed expansion of the existing doctor's surgery which has an insufficient floorspace to accommodate the number of registered patients as well as providing land to ensure that sufficient car parking is available at the surgery. However, these significant factors have not been taken into account when determining whether or not this site should be allocated.

Stage 4 - Discussion of submitted sites

9.26 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.
- 9.27 No constraints were identified in relation to the development of Land at Dereham Road, Reepham. It was actually identified that the development of this site could benefit from linkages through the saved allocation to the schools.
- 9.28 Even without consideration of the fact that the identified constraints will be appropriately mitigated as identified in the Concept Plan and without consideration of the significant planning gains which would be provided through the allocation of Land at Dereham Road, the site was identified as providing a reasonable alternative in the site selection process.

Stage 5 - Shortlist of reasonable alternative sites for further assessment

- 9.29 The reasonable alternative sites were then shortlisted in Stage 5 including the Land at Dereham Road, Reepham.

Stage 6 - Detailed site assessments of reasonable alternative sites

- 9.30 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.
- 9.31 This further assessment does not indicate that the constraints associated with traffic congestion, pollution, pressure on services, public transport or sewerage which were identified in Stage 3 present a barrier to development. Therefore, Stage 6 demonstrates that the majority of the constraints identified in previous stages of the site selection process either do not exist or that they can be appropriately addressed.
- 9.32 This demonstrates that the site selection process up to Stage 5 is based at least in part on inaccurate or incomplete information for some sites, including Land at Dereham Road, Reepham. In some circumstances this may have resulted in sites being dismissed as reasonable alternatives at Stage 4. Regardless of the site selection process which has identified constraints that do not exist at Land at

- Dereham Road, this site has correctly been identified as a reasonable alternative. The same may not be true of other sites.
- 9.33 However, in Stage 6 a number of other constraints have been identified at Land at Dereham Road which had not been identified in previous stages. The only issues which are raised relate to the ability of the footway to the town centre to accommodate increased use, the potential for providing acceptable visibility splays and the potential for some landscape and tree issues at the land north of Dereham Road.
- 9.34 The ability of the footway to accommodate additional users will be addressed through a number of mechanisms including supporting the use of the alternative route along Park Lane and Ewing Close to the town centre, and traffic calming measures which the County Council has identified will lower traffic speeds and make a safer environment for vehicles and pedestrians.
- 9.35 Traffic surveys have also been undertaken which demonstrate that suitable visibility splays can be provided in each direction.
- 9.36 The Concept Plan sets out a high quality, landscape led approach to ensure a sensitive design approach at both the land north and south of Dereham Road. At the land north of Dereham Road, new areas of open space and tree planting throughout will minimise any potential effects on the wider landscape and existing properties. The proposed office accommodation will also be designed to replicate a traditional farmstead set within a generous landscape setting with tree planting throughout which will reduce the massing of the building and integrate it with the wider landscape setting.
- 9.37 Therefore, whilst a number of constraints have been identified, these have and are being positively addressed through the design of the proposed development and its access strategy.

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

- 9.38 At Stage 7, the site selection process concludes that no allocations will be proposed at Reepham owing to the existing level of commitments at the settlement and the identified environmental and infrastructure constraints.

- 9.39 This does not recognise the opportunities to address the existing infrastructure constraints, including the identified shortfall in floorspace in the GP surgery in Reepham, which may be provided by new development to the benefit of existing and future residents. Nor does it recognise the adverse effects which may arise thorough the absence of allocations, including potentially the loss of a significant local employer.
- 9.40 The remaining constraints at each potential site are set out in Stage 7. These are limited to the impact on the existing footway and the ability to accommodate appropriate visibility splays for the Land at Dereham Road. As identified above, highways officers of the County Council have indicated that with appropriate mitigation, appropriate pedestrian access can be provided to the town centre to serve the employment and possible surgery expansion and Traffic Surveys have identified that appropriate visibility splays can be provided on-site. There is also an alternative walking route along Park Lane and Ewing Close to the town centre, the use of which would be encouraged by a new pedestrian link between Land south of Dereham Road and Park Lane. Therefore, there are no remaining identified constraints to justify the Land at Dereham Road not being allocated, especially when it provides solutions to existing infrastructure issues and provides the preferred site to retain and grow a significant local employer.

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

- 9.41 A Sustainability Appraisal (SA) has been carried out in support of the GNLP. This assesses Land at Dereham Road, Reepham as a reasonable alternative for a residential development of 100-200 homes. However, the SA does not assess the form of development proposed at this site, namely a landscape led scheme including employment land to provide for the relocation of an existing business, land for the expansion of the GP surgery and a mix of housing uses providing around 50 homes.
- 9.42 Unsurprisingly, given that the SA has assessed a potential form of development that is not being proposed, it has concluded that there would be some negative effects which would arise. However, had the form of development proposed been assessed this would have demonstrated that the Land at Dereham Road offered a sustainable development option.

- 9.43 SA Objective 1 – Air Quality and Noise – the SA identifies that the Land at Dereham Road is proposed for the development of 100 or more dwellings and so could potentially result in a significant increase in local air pollution such that it would provide a major negative impact.
- 9.44 However, as identified above, the Land at Dereham Road is actually proposed for only around 50 dwellings and so should be assessed consistently with other proposals of a similar scale, namely that it would have a minor negative impact.
- 9.45 Therefore, had the SA properly assessed the proposed development at Land at Dereham Road, it is evident that this would have performed better and equitably with the best performing residential alternative in Reepham under this objective and within the best performing across the GNLP area.
- 9.46 Furthermore, the operational impact of the scheme on existing air quality receptors is also predicted to be negligible and the air quality at the site is predicted to be within the relevant health-based air quality objectives and so it is likely that the SA overstates the effect of the proposed development under this objective.
- 9.47 SA Objective 2 – Climate Change Mitigation and Adaptation – the SA identifies that the development of Land at Dereham Road, Reepham is proposed for the development of between 60 and 600 dwellings and would therefore have a minor negative impact on carbon emissions. However, as identified above, this site is actually proposed for only 50 dwellings and so the SA has incorrectly assessed the site.
- 9.48 The SA indicates that small proportions of the Land at Dereham Road coincide with areas determined to be at risk of surface water flooding and accordingly the development of this site would be likely to locate end users in areas at high risk. This takes no account of the fact that the small areas at risk of surface water flooding would not be proposed for development and that SuD’s would be provided to attenuate any flood issues. It is also wholly inconsistent with the response of the Lead Local Flood Authority in the Site Assessment Booklet who have raised no concerns and the absence of any concerns raised by any other consultee. Therefore, the Land at Dereham Road should be assessed more favourably under this objective in accordance with the advice of the Lead Local Flood Authority.

- 9.49 SA Objective 3 – Biodiversity, Geodiversity and Green Infrastructure – the SA indicates that all of the sites in Reepham have the potential to negatively affect this objective as do the overwhelming majority of sites across the GNLP area. It is also apparent from paragraphs B.40.3.1 to B.40.3.3 that the Land at Dereham Road is less constrained in ecological terms than the other sites.
- 9.50 A Preliminary Ecological Survey has confirmed that the site is not subject to any statutory nature conservation designations and that the development of the site would not directly impact upon designated sites. A project level Habitats Regulation Assessment has confirmed that any impacts can be adequately mitigated.
- 9.51 SA Objective 4 – Landscape – the SA indicates that all of the residential sites in Reepham have the potential to impact the landscape in one way or another.
- 9.52 The Concept Plans for the Land north and Land south of Dereham Road propose a landscape-led approach with new areas of open space and tree planting throughout to integrate the scheme into the wider landscape. The Site Assessment Booklet identifies that the land south of Dereham Road would result in less townscape/tree issues even without taking account of the proposed landscaping. The land north of Dereham Road benefits from existing structural tree planting and will be integrated into the surrounding landscape through new areas of open space, tree planting and appropriate massing.
- 9.53 SA Objective 5 – Housing – the SA indicates that all of the residential sites in Reepham have a major positive effect on housing provision given that they are all proposed for 100 or more dwellings. This is directly contrary to the conclusions of the site selection process which suggests that there is no need for additional housing in Reepham given the extent of existing commitments.
- 9.54 Regardless of this inconsistency between the SA and the site selection process, the Land at Dereham Road has been designed to provide around 50 homes which would still provide a positive effect under this objective as well as providing significant community infrastructure in the form of a site for the relocation of an existing employer and land for the expansion of the existing surgery (on Land north of Dereham Road) to the benefit of the entire community.
- 9.55 The potential positive effects of development at the Land at Dereham Road are even more pronounced given the proposal to provide bungalows, affordable

- housing and self-build plots to meet the needs of the community (on Land south of Dereham Road).
- 9.56 SA Objective 6 – Population and Communities – the SA assesses the potential impact upon population and communities based on the proximity of sites to a post office or convenience store and local landscape designations without any consideration of other services and facilities or the capacity of the development of sites to enhance community services and facilities.
- 9.57 The Land at Dereham Road provides the opportunity to address the identified need for an expansion of the surgery at Reepham as well as retaining a significant local employer and will thereby have a major positive effect on population and communities.
- 9.58 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.
- 9.59 SA Objective 8 – Health – the SA assesses the Land at Dereham Road as having a minor positive impact owing to the proximity to the green network, the distance from a main road, the distance from an AQMA, and the distance from the GP surgery. However, it is nevertheless assessed as providing a minor negative impact overall owing to the distance from a hospital and a leisure centre.
- 9.60 This assessment does not take any account of the fact that the Land at Dereham Road provides for an expansion of the existing surgery, which is identified as being required by the GNLP Infrastructure Needs Report. This provides a major positive impact which is entirely disregarded in the SA.
- 9.61 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.
- 9.62 SA Objective 10 – Education – the SA assesses the Land at Dereham Road as providing a major positive impact under this objective, which applies to very few sites across the entire GNLP area.

- 9.63 SA Objective 11 – Economy – the SA acknowledges that the development of all of the potential residential sites in Reepham would have a minor positive effect on the economy owing to the accessibility to employment opportunities.
- 9.64 However, the SA does not recognise that the development of Land at Dereham Road may be required to retain a significant number of these employment opportunities within Reepham and that it also provides the opportunity for an existing employer to grow their business as well as potentially providing additional employment opportunities at an expanded GP surgery. Therefore, the Land at Dereham Road provides a major positive impact.
- 9.65 SA Objective 12 – Transport and Access to Services – the SA assesses all sites within Reepham as performing equitably under this objective. The site is assessed as providing a minor negative impact on this objective as are the overwhelming majority of sites within the GNLP area.
- 9.66 SA Objective 13 – Historic Environment – the SA assesses the Land at Dereham Road as potentially having a negligible impact on the setting of Grade I, Grade II* Listed Buildings but potentially having a minor negative impact upon the Grade II Listed Buildings of Vale House and Eynesford House and on the Conservation Area.
- 9.67 The Concept Plan and Delivery Statement identify that these designated heritage assets are screened from the Site by existing development and accordingly they would be unaffected by the development of the Site.
- 9.68 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.
- 9.69 The SA again assesses the Land at Dereham Road as though it will provide between 100-200 dwellings rather than around 50 as proposed in the Concept Plan for Land south of Dereham Road. The effect of this is that the SA considers this site to provide a minor negative impact rather than a neutral impact.
- 9.70 The SA also suggests that the use of previously undeveloped land would necessarily be an inefficient use and land. As a result of the housing need and

the capacity of previously developed sites, this is not a credible position as it will be necessary for some greenfield development to be forthcoming.

9.71 SA Objective 15 – Water – the SA assesses all of the sites in Reepham, and the majority across the GNLP area as providing a minor negative impact under this objective.

9.72 In summary, the SA has assessed a fundamentally different proposal for the Land at Dereham Road, Reepham from that which is being proposed. The attached Concept Plans propose a high-quality landscape-led scheme including community infrastructure to address pre-existing issues within the town. Had the SA assessed what is actually being proposed on the site, it would have concluded that the Land at Dereham Road was highly sustainable and gives rise to major positive effects. Indeed, it is likely that the Land at Dereham Road would have been assessed more favourably than the proposed saved allocation at REP1 had the proposed development been assessed.

9.73 There are also numerous inexplicable or unexplained conclusions reached within the SA which will need to be reconsidered or explained in the light of the available evidence.

Conclusions on the Sites Plan

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

- Some sites, including Land at Dereham Road, have been assessed as being developed entirely for residential uses within the Site Assessment Booklets and the SA, notwithstanding that this is being proposed for a landscape-led scheme including land for the much-needed expansion of the GP surgery, a site for the relocation of an existing local employer and around 50 homes to meet local needs;
- Many of the conclusions reached have been affected by the consideration of a proposal which is not being advanced;
- 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;

- The SA reaches conclusions which are directly contrary to the Site Assessment Booklets, for example it concludes that the Land at Dereham Road could locate some dwellings in areas at risk of flooding notwithstanding that the Site Assessment Booklets identify that the LLFA have identified no flood risk constraints on the site;
- A number of the findings within the SA are not adequately explained or comprehensible;
- It does not take any account of the opportunities provided by the delivery of some sites, such as Land at Dereham Road to address pre-existing issues;
- It is based on a high-level assessment without the detailed work having been undertaken as has been done on behalf of Pigeon which demonstrates that the Land at Dereham Road can be sustainably delivered.

9.75 Pigeon would welcome the opportunity to meet with officers to discuss the opportunities which can be provided through the delivery of the site at Land at Dereham Road.