

Greater Norwich
Draft Local Plan
Gladman Representations



March 2020

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Appendix 1 Ashford Local Plan Policy HOU5 Extract

1 INTRODUCTION

- 1.1.1 This representation provides Gladman’s comments made in response to the current consultation regarding the draft version of the Greater Norwich Local Plan (the GNLP). This document addresses the strategic development needs for Norwich City Council, South Norfolk District Council and Broadland District Council.
- 1.1.2 Gladman specialises in the promotion of strategic land for residential development with associated community infrastructure and currently has a number of land interests across the Greater Norwich plan area. Individual submissions have been made in reference to these interests under separate cover.
- 1.1.3 The comments made in this representation seek to promote Gladman’s land interests, reflect Gladman’s knowledge of planning policy and the plan preparation process, and experience of planning issues within the plan area and the wider county.
- 1.1.4 Gladman welcomes the Greater Norwich Growth Board’s continued progress to advance the preparation of a new Local Plan towards adoption. The Joint Core Strategy was adopted by the Councils in 2014 and is now therefore over 5-years old. The failure to maintain an up-to-date Local Plan could put local decision making at risk as a result of changes to assessing housing needs, and the Housing Delivery Test. More importantly, the absence of an up-to-date Local Plan reduces the effectiveness of strategic plan making and decision making in meeting and responding to current local needs, challenges, and fulfilling local opportunities.
- 1.1.5 This consultation provides the first opportunity to comment on the Council’s preferred approach for the Local Plan. The Local Plan is being prepared in conformity with the policies of the 2019 NPPF. Comments provided in this representation therefore consider whether the Council’s proposals meet the tests of soundness as set out in the 2019 NPPF.
- 1.1.6 The comments provided in this representation have been structured to reflect the draft GNLP with Section 4 considering the Plan’s Vision and Objectives; Section 5 - Sustainable Growth Strategy; Section 6 - Housing and Section 7 - Areas for Growth. Before this, Gladman briefly considers the latest national planning policy and guidance (see Section 2) and legal requirements (see Section 3). Section 8 provides Gladman’s conclusions and final recommendations for the GNLP.

2 NATIONAL PLANNING POLICY AND GUIDANCE

2.1 National Planning Policy Framework (2019)

2.1.1 On the 24th July 2018, MHCLG published the revised National Planning Policy Framework. The first revision since 2012 sought to implement 85 reforms to national planning policy as announced through the 2017 Housing White Paper. This version of the NPPF was itself superseded on the 19th February 2019 (2019 NPPF), with the latest revision making alterations to wording relating to the approach to Appropriate Assessments, clarification to footnote 37, and minor amendments to the definition of 'deliverable' as set out in Annex 2 of the NPPF.

2.1.2 The revised NPPF introduces several major changes to national planning policy. The changes reaffirm the Government's commitment to ensuring that up-to-date plans are in place which provide a positive vision for the areas they cover. Plans should also provide a framework for addressing housing needs and other economic, social and environmental priorities, and provide a platform for local people to shape their communities. In particular, Paragraph 16 of the 2019 NPPF states that Plans should:

'Be prepared with the objective of contributing to the achievement of sustainable development;

Be prepared positively, in a way that is aspirational but deliverable;

Be shaped by early, proportionate and effective engagement between plan-makers, and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

Be accessible through the use of digital tools to assist public involvement and policy presentation; and

Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework), where relevant.'

2.1.3 NPPF 2019 revises the tests of soundness required to be demonstrated to have been met before a Local Plan can be adopted. Paragraph 35 of the NPPF confirms that to be considered 'sound' plans must be:

- a) **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- b) **Justified** – An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent** with national policy – Enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 2.1.4 Annex 1 of the 2019 NPPF confirms that for Plans submitted for examination to the Secretary of State following the 24th January 2019, the policies contained in the 2019 NPPF apply. The Local Plan will therefore be tested against the policies of the 2019 NPPF.
- 2.1.5 To support the Government’s continued objective of significantly boosting the supply of new homes, it is important that the Local Plan provides a sufficient amount and variety of land that can come forward without delay where it is needed to meet housing needs.
- 2.1.6 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment, defined using the standard method unless there are exceptional circumstances to justify an alternative approach.
- 2.1.7 Once the minimum number of homes required has been defined, paragraph 67 of the 2019 NPPF requires a Local Planning Authority to have a clear understanding of the land available in its area through the preparation of a Strategic Housing Land Availability Assessment (SHLAA). This assessment should be used to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Paragraph 67 requires a supply of:
- A) Specific, deliverable sites for years one to five of the plan period; and
 - B) Specific, deliverable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- 2.1.8 Annex 2 of the 2019 NPPF, provides updated definitions for the terms ‘deliverable’ and ‘developable’. These are:
- ‘To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:
- a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'

2.1.9 Local Authorities are required to meet the assessed housing need as defined by the Standard Method as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the 2019 NPPF).

2.1.10 Securing the full and timely delivery of housing is a key objective of the 2019 NPPF. Paragraph 73 confirms the need for local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing. This should include a 5%, 10% or 20% buffer to the five-year supply depending on local circumstances.

2.1.11 The 2019 NPPF introduces the need for local planning authorities to ensure that housing delivery is maintained in alignment with the minimum requirements of the Plan over the duration of the plan period. The Housing Delivery Test provides a measure of how many homes are delivered in an authority over a rolling 3-year period in contrast to its housing requirement or need. Where delivery falls below specific thresholds of the housing requirement, the Housing Delivery Test identifies specific actions or consequences required to be implemented to strengthen the future supply.

2.2 Planning Practice Guidance

2.2.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be implemented. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes made to PPG relate to defining housing need, housing supply and housing delivery performance.

2.2.2 The Standard Method was introduced by the Government to simplify the process for defining housing need, and avoid significant cost and delay experienced in the plan preparation process.

2.2.3 The Standard Method is derived utilising a three-step process defined in PPG. This confirms the use of nationally published household projections to determine the starting point for this assessment. An upward adjustment is then made in response to affordability problems based on a pre-determined formula. Where the Standard Method requirement results in an uplift of 40% or more to the existing OAN/requirement, a local authority is permitted to apply a cap to the requirement, adopting the capped requirement instead.

2.2.4 It is clear in both the NPPF and PPG that the Standard Method forms only the minimum level of housing need for a local authority area. PPG also sets out that there will be circumstances where the housing requirement could be increased to a level which is higher than that identified through the application of the Standard Method. These circumstances include (but are not limited to):

- Where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding to promote and facilitate growth (e.g. housing deals);
- Where strategic infrastructure improvements are planned that would support new homes;
- Where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground;
- Previous delivery levels, where these have exceeded the minimum figure identified; and
- Recent assessments of need, such as a SHMA, where these suggest higher levels of need.

2.2.5 Whilst the Standard Method provides the Government's preferred approach to defining the minimum level of housing need for each local planning authority, alternative approaches may be applied where justified by exceptional circumstances.

3 LEGAL COMPLIANCE

3.1 Duty to Cooperate

- 3.1.1 The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.¹
- 3.1.2 The revised Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SOCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross-boundary strategic issues are likely to exist. The revised Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SOCG), throughout the plan making process². The SOCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross-boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.
- 3.1.3 As demonstrated through the outcome of the Coventry, Mid Sussex, Castle Point and St Albans Local Plan examinations, if a Council fails to satisfactorily discharge its DtC, a Planning Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications.
- 3.1.4 It is noted that in Norfolk there is a strong history of cross-boundary cooperation and engagement. This exists locally with the production of the joint Core Strategy and now GNLP, the Norfolk Spatial Planning Framework, and work associated with the Anglia LEP. It will be important, in order to meet legal requirements and the tests of soundness, that this cross-boundary engagement continues through remaining stages of plan preparation, with evidence of ongoing working and mechanisms for this to continue beyond adoption of the GNLP.

3.2 Sustainability Appraisal

- 3.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies that are set out in local plans must be the subject of a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the

¹ PPG Reference ID: 61-021-20180913

² PPG Reference ID: 61-001-20180913

effects of the GNLP's proposals on sustainable development when judged against all reasonable alternatives.

- 3.2.2 The Council should ensure that the results of the SA process conducted through the Review clearly justify any policy choices that are ultimately made, including the proposed site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making, and scoring should be robust, justified and transparent.
- 3.2.3 The SA must demonstrate that a comprehensive testing of options has been undertaken and that it provides evidence and reasoning as to why any reasonable alternatives identified have not been pursued. A failure to adequately give reasons in the SA could lead to a challenge of the Council's position through the examination process. The SA should inform plan making. Whilst exercising planning judgement on the results of the SA in the Local Plan is expected, the SA should still clearly assess any reasonable alternatives and articulate the results of any such assessment.

4 VISION AND OBJECTIVES

4.1 Question 6: Do you support or object to the vision and objectives for Greater Norwich?

Vision

- 4.1.1 Gladman supports the general pro-sustainable growth vision outlined by the Councils for the GNLP. The provision of new homes, opportunities for employment, strategic infrastructure and protection of the environment and resources all fulfil a key role in achieving the Councils' vision. A core missing element of the vision, however, is the need to secure the integration of economic, housing and infrastructure strategies to ensure that the pattern of development provided through the Local Plan is sustainable and deliverable. The need for this integration in forming targets and determining the location of development and specific sites should be better reflected within the Plan's vision.

Objectives

- 4.1.2 Objectives covering the economy, communities, new homes, infrastructure, delivery and the environment are outlined within the GNLP. In broad terms, Gladman is supportive of the objectives outlined, however in several instances it is considered that these do not go far enough. Under the economic objective the wording should be expanded to recognise the role housing delivery has in supporting sustainable economic growth, particularly in supporting town centres. In particular there is a need to ensure that the proposed level of allocations made through the GNLP maximises economic growth potential provided through the City Deal and the A11 Norwich to Cambridge technology corridor.
- 4.1.3 Beyond this, Gladman considers that reference is needed within the homes objectives which seeks to meet affordable housing needs in full and addresses house price unaffordability to promote home ownership and to secure homes in the area for first time buyers, families and the elderly. The objective should be expanded to also ensure that the housing needs of the elderly and disabled are met through the plan period.

5 THE STRATEGY

5.1 Question 13: Settlement Hierarchy

Settlement Tiers

5.1.1 It is agreed that the Norwich Urban Area, including fringe parishes such as Costessey, forms the principal settlement within the joint plan area and wider region. The continued identification of the Norwich Urban Area at the top of the settlement hierarchy is supported by Gladman and it is accepted that the Urban Area should accommodate the largest proportion of new development planned for the plan period.

5.1.2 The inclusion of Diss and Wymondham as Main Towns in the second tier of the settlement hierarchy is supported. Gladman agrees that both settlements provide some of the most logical and sustainable locations for new development within the Greater Norwich Plan area beyond Norwich itself. Further development should therefore be directed towards both Diss and Wymondham through the GNLP.

Gladman also supports the identification of Poringland as a “Key Service Centre”. Poringland represents one of the more sustainable settlements listed as a “Key Service Centre” in the draft settlement hierarchy. Proportionate development relative the role and level of sustainability should be directed to Poringland.

Distribution of Development

General comments on Distribution

5.1.3 The Plan adopts Option 3, supporting the Cambridge to Norwich Tech Corridor as the basis for the distribution of development through the GNLP. It is acknowledged that the Tech Corridor forms a core role in the economic ambitions of the GNLP and as a result it is both appropriate and sound to concentrate new development towards this broad strategic location. However, as advised in our previous representations, the implementation of this strategy should not come at the cost of maintaining the sustainability and important role played by settlements which fall outside this corridor. It is important that sufficient development is directed to these settlements to support their longer-term sustainability and functionality. Opportunities should also be taken to focus growth towards those settlements which are well served by public transport to support climate change objectives. As such, Gladman consider that a mix of Options 2, 3 and 4 should form the basis of the distribution of growth adopted through the GNLP rather than Option 3 alone.

Norwich Urban Area

- 5.1.3 The Norwich Urban Area forms the largest built area in the plan area and wider county and is home to the largest and most diverse housing need. The Norwich Urban Area has the greatest range of services and facilities, the most diverse retail offer, and forms the economic hub of the plan area and wider county. The City Deal and strategic growth corridor initiatives provide significant opportunities for job creation, largely concentrated in the Norwich urban area. This means that the Norwich Urban Area plays an integral role to achieving the economic ambitions of the joint Plan which should be responded to through the allocation of additional land for development through the GNLP.
- 5.1.4 Gladman is supportive of Costessey being identified as the location for the planned 1,000 dwelling contingency. Costessey forms an integral part of the Norwich Urban area, with strong public transport links into Norwich City Centre, as well as access to the strategic road network. The infrastructure in and around Costessey is already well developed and Costessey benefits from a wide range of existing services and facilities, as well as access to local sources of employment. Importantly, Costessey is located on the opposite side of the Norwich Urban Area to the strategic growth triangle, which is to experience significant levels of growth over the plan period. Costessey has relatively limited commitments and as such there is little to suggest that additional supply directed to the settlement would result in a saturated market and reduced housing delivery. Costessey therefore represents a suitable location at which further housing needs can be realistically be sustainably accommodated.
- 5.1.5 Gladman however considers that the contingency site identified for Costessey is needed now and as such should be identified as an allocation for housing through the GNLP. Further homes are required in the Norwich urban area to respond to the extended plan period, as well as to capitalise on and secure the delivery of strategic economic objectives for the Norwich to Cambridge Technology Corridor. The Site should be allocated for housing now, to ensure that there is sufficient flexibility provided in the housing land supply to ensure full delivery of housing needs identified for the Norwich urban area should housing delivery at the Growth Triangle be lower than anticipated.

Diss

- 5.1.6 Diss is a market town located in the very south of the plan area, and forms an important service, retail and employment role for a large rural hinterland which extends beyond the plan area into North Suffolk. Further development is required in Diss to maintain and protect the quality of services and facilities available in the town.
- 5.1.7 Only limited growth is identified for Diss through the GNLP as drafted. Supporting information advising highways constraints appears to be founded on a much higher level of growth than proposed and known to be available. The role of new development in addressing broader constraints, such as school capacity, does not appear to have been fully explored.

- 5.1.8 It is considered that the strategy for Diss fails to adequately support the sustainability of the town, or its role as a service centre for wider rural area. The limited growth identified for the town does not support opportunities and objectives to enhance the retail offer in the town. Diss forms the most appropriate location for development in the south of the plan area. It is also well served by public transport, and additional growth here would align to climate change policy and objectives by minimising reliance on unsustainable modes of transport. Further allocations should therefore be sought at the town.

Wymondham

- 5.1.9 Wymondham is sustainable settlement located on the A11 corridor. The town is the largest population centre in the plan area outside the Norwich urban area. It features a wide range of services and facilities including a primary school, secondary school, food store, doctor's surgery, pharmacy, and community centre. The town benefits from rail links to Norwich and Cambridge, with a high-quality bus route into Norwich City Centre.

- 5.1.10 Wymondham is located within the Norwich to Cambridge Tech Corridor with access to both the A11 and the Norwich to Cambridge railway line. The growth corridor forms the heart of the spatial strategy for the draft GNL, yet despite Wymondham's strategic position within the corridor, minimal additional growth is planned in the settlement in addition to already committed development.

- 5.1.11 Gladman consider that the absence of allocations in Wymondham significantly reduces the effectiveness of the GNL in delivering Tech Corridor ambitions and opportunities to the town and respond to evidence of updated needs and policy requirements which will not be captured by existing commitments. Gladman acknowledge the potential for further growth in the town brought by the possible contingency. Gladman is supportive of the Councils consideration of further opportunities for growth in Wymondham, however consider that this contingency should be made an allocation to make the most of Strategy Growth Corridor opportunities, and respond to overall concerns submitted later in these representations regarding the proposed housing requirement and amount of development planned.

Poringland

- 5.1.12 Poringland is a sustainable settlement, featuring a primary school, GP surgery, Secondary School, Pharmacy, Community Centre, and Food Store. The village is also served by highly regular bus services to Norwich. Poringland therefore represents both a suitable and sustainable location for new development and forms arguably the most appropriate Key Service Centre at which to meet development needs.

5.1.13 Currently, the draft Plan does not seek to direct any growth to Poringland beyond committed development. Gladman does not consider this to represent a sound strategy noting the above sustainability credentials which makes the settlement the principal option for accommodating rural housing needs. Opportunities for further sites for allocations should be sought and identified through the GNLP.

5.2 Question 14: Housing Numbers and Delivery

Proposed Housing Requirement

- 5.2.1 Draft Policy 1 proposes a housing requirement of 40,550 dwellings for the plan period 2018 to 2038 (2,028 dpa). This reflects the local housing needs for the Greater Norwich Plan Area using the Government's standardised methodology. Having reviewed the wider evidence base informing the Plan, Gladman is not convinced that the standard method figure alone provides a sufficient level of housing growth for the Greater Norwich Plan Area especially in the context of the ambitious economic growth objectives set out in the draft GNLP. Further work is therefore necessary to understand the link between planned housing and job targets.
- 5.2.2 The standard method represents the minimum housing needs for the area and considers only demographic need and affordability. The standard method does not account for the housing needed to support economic growth needs or ambitions, nor does it align to commitments made for strategic investments or funding which might influence the level of housing growth required in an area.
- 5.2.3 PPG confirms the following circumstances in which the adoption of a higher housing requirement above the standard method may be justified³. This includes but is not limited to:
- Growth Strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
 - Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally;
 - An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground; and
 - On occasion, situations where previous levels of housing delivery in an area, or previous assessments of need are significantly greater than the outcome from the standard method.
- 5.2.4 The Greater Norwich authorities benefit from the City Deal which commits to facilitating the delivery of 13,000 more jobs than the target set within the joint Core Strategy. Reflecting this commitment, Draft Policy 1 advises a job target of 33,000 jobs over the period 2018 to 2038. This

³ See PPG Paragraph 010 Reference ID: 2a-010-20190220

requirement accounts for the remaining job growth associated with the City Deal and the longer term benefits the City Deal is predicted to have for the Greater Norwich economy. This represents an uplift of around 8,000 jobs against the baseline trend forecast as set out through the East of England Forecasting Model which might have otherwise informed the job targets of the emerging Plan.

5.2.5 Despite having influenced the economic growth strategy of the Draft GNLP, the City Deal does not appear to have been considered in determining the housing requirements of the Greater Norwich Draft Plan. This ignores the intricate links between the supply of housing and employment land, and the constraining nature insufficient delivery of housing can have on securing sustainable jobs growth otherwise recognised in Paragraph 81 of the NPPF.

5.2.6 To ensure consistency with national planning policy, the authorities should assess to what degree the proposed housing requirement will support the implementation of the jobs growth figures set out in draft Policy 1. Should this assessment show that the supply of housing land planned through the GNLP would fail to provide for a sufficient economically active workforce, an appropriate upward adjustment should be made to the housing requirement to ensure that housing land supply does not act as a constraint to planned levels of economic growth. At present this additional, but important assessment, is missing from the supporting evidence base to the GNLP and is required to ensure that the proposed housing requirement is robust and consistent with national planning policy.

Supply

5.2.7 Gladman welcomes and is supportive in principle of the proposal to allocate surplus housing land in contrast to proposed requirements through the GNLP. This surplus will help secure a significant boost in housing land supply, heighten the deliverability of the defined housing requirement, and ensure that the GNLP is durable to any changes which might occur over the plan period.

5.2.8 The need to secure deliverability is significant in the case of the GNLP where much of the housing requirement is evidently already met by committed developments (around 85%), and in particular, a relatively small number of larger schemes. This includes the Old Catton, Sprowston, Rackheath, and Thorpe St Andrew growth triangle located north and east of Norwich which will provide around 13,500 dwellings, as well as other strategic development sites at Cringleford, Costessey, Long Stratton and Wymondham. Should any of these sites stall or fail to come forward as envisaged, the GNLP will quickly fail given the significant contribution made by these sites to the housing needs of the plan area. It is therefore important to plan for an increased supply and to allow flexibility to account for any potential shortfall at any of these sites.

5.2.9 A targeted buffer of 10% to the housing land supply is currently proposed through the draft Plan. Noting the significant degree of committed developments and the role played by large scale development cited above, Gladman does not consider this buffer to be sufficient and should be

increased to no less than 20%. This would provide for a total supply of 48,660 dwellings (8,110 dwellings in excess of the requirement). The adoption of this higher buffer would provide greater certainty that the housing requirement, as currently defined, is met in full.

Contingency

- 5.2.10 In addition to the proposed buffer to the housing land supply, the GNLP identifies possible locations for further growth as contingency, should sites fail to come forward as envisaged. This includes 1,000 dwellings at Costessey, and the potential for a further 1,000 dwellings at Wymondham.
- 5.2.11 Further detail about the merits of specific locations for this contingency is set out under separate cover by Gladman. It is however unclear, at this draft stage, as to how the Councils envisage that the contingency sites might come forward when required in the plan period. As drafted the GNLP sets out no mechanism under which these contingency sites might come forward. The GNLP is therefore silent under what conditions these sites might be permitted by the relevant local authority, and what the approach to securing the delivery the proposed contingency locations are. In this regard the GNLP is ineffective, and a revised approach is necessary to secure its deliverability.
- 5.2.12 Gladman's preference is for this contingency (at both Costessey and Wymondham) to be included within the Greater Norwich Local Plan as allocations for housing. This position takes into account comments made above in relation to housing need and the case for flexibility in planned levels of supply, should committed and other allocated sites fail to come to fruition. Allocating this land for housing provides the greatest certainty that sites can come forward without delay, sites are available and deliverable for housing, and reduces the need for future review.
- 5.2.13 Should the Councils disagree with the above, Gladman considers that additional wording is necessary in Draft Policy 1 to set out how contingency sites would come forward. The need for flexibility in this wording is key in order to minimise delay in meeting any arising unmet need and ensure that identified contingency sites are effective in responding to a requirement for an increase in the supply of housing land. As such, any policy requiring first a review of the GNLP before development is permitted at contingency sites should be avoided owing to the significant delay such a process would have, significantly reducing the merits of contingency sites in addressing any housing shortfall.

5.3 Question 16: Review and Five-Year Land Supply

Plan Review

- 5.3.1 Commitment is made within the GNLP to review after 5-years. Whilst the inclusion of this review within the Plan is welcomed, Gladman considers that wording relating to the timing of this review should be revised to ensure full consistency with national planning policy.
- 5.3.2 The GNLP should be reviewed within 5 years where necessary in response to significant changes in evidence, or where housing supply falls significantly and cannot be effectively addressed by the

policies of the GNLP. This will provide flexibility for the Councils should conditions relevant to policy change significantly and unpredictably between adoption of the Plan and ahead of the 5-yearly review, ensuring that the development plan is responsive and durable to change.

5.3.3 In addition, and consistent with Paragraph 33 of the NPPF, the Councils should aim to complete the 5-year review of the GNLP ahead of the 5-year anniversary of adoption in order to avoid the Plan becoming out-of-date should land requirements depart significantly from evidence of needs. This takes into account the fact that national planning policy advises that the standard method will provide the basis for the calculation of five-year land supply where housing needs evidence supporting existing Local Plans becomes more than five-years old⁴.

5.3.4 Gladman considers that the future and early review of the GNLP should be inserted in draft Policy 1 or as a new policy.

Five-year land supply

5.3.5 The draft GNLP advises that the five-year housing land supply position for the plan area will be calculated as a whole, rather than on a district or sub-district basis. The move away from a sub-district basis for this calculation is supported by Gladman. The current approach produces a five-year supply position for the Norwich Policy Area, and then a different supply position in the wider Districts beyond this location. This creates unnecessary complexity, reduces the scope for any deficiency in supply to be effectively addressed, and potentially removes the need or responsibility for action to address any supply shortages.

5.3.6 The proposed approach to calculate five-year supply across the GNLP area will address these flaws, securing a role for all of the Greater Norwich Councils in maintaining a sufficient level of supply over the plan period. The approach adopted is also responsive to the Housing Delivery Test which examines supply on this cross-boundary basis providing a single result for the authorities each year.

⁴See Paragraph 73 and Footnote 37 of the NPPF

6 HOUSING

6.1 Question 27: Affordable Housing

- 6.1.1 Policy 5 outlines that the affordable housing requirement for residential development proposals of 10 dwellings for more is at least 33% across the plan area except in Norwich City Centre where the requirement is at least 28%. Gladman supports the principle of improving affordability across Greater Norwich and the need to identify an appropriate affordable housing target for differing built environments that reflects the local circumstances.
- 6.1.2 Notwithstanding the above support, the Councils will need to be able to demonstrate through clear, robust, up-to-date viability assessment that the provision of affordable housing in line with the proposed policy is viable on the majority of schemes. Gladman endorses the comments made by the HBF in this regard.
- 6.1.3 Gladman advocates the need for some flexibility within the affordable housing policy. This should be implemented dependant on the site-specific circumstances where constraints and limitations would hinder a site's progression. This flexibility would ensure viability for development locations and guarantee delivery.

6.2 Question 29: Accessible and Specialist Housing

- 6.2.1 Policy 5 relates to the provision of accessible and specialist housing to meet the needs of older people, disabled people and vulnerable people with specific housing needs. Gladman is supportive of a policy in relation to this type of housing provision.
- 6.2.2 The provision of specialist housing to meet the needs of older people is of increasing importance and the Councils need to ensure that this is reflected through a positive policy approach within the GNLP. The Councils need a robust understanding of the scale of this type of need across the plan area.
- 6.2.3 Specialist housing with care for older people is a type of housing which provides choice to adults with varying care needs and enables them to live as independently as possible in their own self-contained homes, where people are able to access high quality, flexible support and care services on site to suit their individual needs (including dementia care). Such schemes differ from traditional sheltered/retirement accommodation schemes and should provide internally accessible communal facilities including a residents' lounge, library, dining room, guest suite, quiet lounge, IT suite, assisted bathroom, internal buggy store and changing facilities, reception and care manager's office and staff facilities.
- 6.2.4 Policy 5 also relates to the Building Regulation M4(2) 'accessible and adaptable dwellings' and requires that 20% of housing should be built to this standard.

6.2.5 With regards to the provision of accessible and adaptable homes, Gladman refers to the PPG which provides additional guidance on the use of these optional standards. The Councils would need to ensure that any such policy in the GNLP is in line with the guidance and that the justification and specific details of the policy take account of the various factors that the PPG refers to:

“Based on their housing needs assessment and other available dataset it will be for the local planning authority to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Buildings Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:

- *The likely future need for housing for older and disabled people (including wheelchair user dwellings).*
- *Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).*
- *The accessibility and adaptability of existing housing stock.*
- *How needs vary across different housing tenures.*
- *The overall impact on viability.” (ID 56-007-20150327)*

6.2.6 In order to be able to include specific requirements in relation to M4(2) and M4(3) the Councils will need to be able to robustly justify the inclusion and demonstrate that consideration has been given to these requirements within the viability study. The provision of M4(3) wheelchair user dwellings is far more onerous in terms of size requirement therefore it is crucial that the implications of any proposed policy requirement have been properly considered.

6.2.7 With regards to M4(3) Gladman refers again to the PPG which states:

“Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.

Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.” (ID 56-009020150327)

6.3 Question 32: Self Build Plots

- 6.3.1 Policy 5 outlines a requirement for all housing sites (allocated or windfall except for flats / apartments) which comprise 40 or more dwellings to set aside a minimum of 5% of the net developable area for serviced plots to be offered for self-build.
- 6.3.2 Gladman objects to the inclusion of a fixed percentage requirement in relation to the provision of serviced self-build plots.
- 6.3.3 Whilst recognising the role attributed towards self-build in national planning policy as a source of housing land supply, we do not consider the inclusion of a requirement for all housing schemes over 40 dwellings to commit to onsite provision forms the most effective approach of responding to this source of housing need.
- 6.3.4 Gladman believes that those wishing to bring forward a self-build or custom build house are unlikely to wish to do this alongside a large-scale housing development. Consequently, rather than including a strict requirement for this provision Gladman would recommend the policy encourages the consideration of the provision of self-build plots in locations where the demand exists.
- 6.3.5 Gladman would prefer to see policy which seeks self-build plots being considered on an ad hoc basis as windfall rather than as a percentage requirement of larger development schemes. We consider this approach to be more in line with the wants and needs for the individuals seeking the plot and the developer's requirements for larger sites.
- 6.3.6 Should a percentage approach be taken forward, the requirement should be supported by and proportionate to clear and robust evidence of this source of housing need. Gladman recommends that any policy requirement in relation to self-build housing has an element of flexibility built in to allow for negotiation over self-build plots on the basis of viability to ensure that site delivery is not delayed or prevented from coming forward. Any specific requirement to include self-build plots should be tested through the Council's viability assessment of the Local Plan policies to ensure that the cumulative impacts of all proposed local standards and policy requirements do not put the implementation of the Plan as a whole at risk.
- 6.3.7 Gladman notes that the proposed policy does include a mechanism which allows developers the opportunity after 12 months to either continue to market the plots for self-build or to revert back to them being delivered as part of the wider market housing scheme. Gladman supports the inclusion of this policy mechanism as it is necessary to ensure that housing land is not unnecessarily prevented from being brought forward. This helps to provide flexibility and helps to ensure that the required housing is delivered. If there is genuine demand for self-build housing it is likely that these plots would be brought forward relatively quickly.

7 AREAS FOR GROWTH

7.1 Question 40: Further Urban Area

7.1.1 Gladman supports the recognised need for housing delivery to be achieved on the edge of the main urban area of Norwich, with surrounding parishes within South Norfolk and Broadland accommodating this growth.

7.1.2 Policy 7.1 outlines the suggested housing growth directed to the urban area with large numbers attributed to strategic urban extensions at Taverham and within the growth triangle. Gladman would argue that the location identified as a contingency site at Costessey would also provide a logical location for residential growth within the plan period and should also be allocated for development through the GNLP and is actively promoting the site on behalf of the landowners

7.1.3 Furthermore, when taking the uncertainty surrounding some of the other location within the plan, namely the Carrow Works and well as the significant reliance placed on growth at the Growth Triangle, it seems logical that this alternative should be included in the Norwich urban area to ensure that the defined housing needs of the plan area are met at the most sustainable locations, and maintain a housing land supply throughout the plan period, given its deliverable nature.

7.2 Question 41: Main Towns

7.2.1 Gladman supports the allocation of additional land at identified Main Towns. This recognises the suitability and sustainability of these areas as suitable locations for development over the plan period. However, for the reasons set out in Paragraphs 5.1.3 and 5.1.6 to 5.1.11 Gladman do not consider that sufficient opportunities for new development, in addition to commitments, is identified particularly in Diss and Wymondham. In response, Gladman consider further allocations should be identified at both settlements, with the proposed contingency for Wymondham, formally allocated as a site for housing.

7.2.2 Gladman considers that strategic gaps should be reviewed and revised through the plan making process of the Greater Norwich Plan. Since defined and last reviewed the context for each strategic gap is likely to have altered taking into account more recent development, with the role of strategic gaps as a development management tool altered given the spatial strategy outlined within the draft Plan. A thorough evidenced based assessment of all affected land parcels together with wider related land is necessary to consider whether strategic gaps remain a relevant and necessary designation to prevent the coalescence of settlements within the plan area.

7.3 Question 43: Key Service Centres

7.3.1 Gladman supports the identification of settlements within this tier of the hierarchy and recognises the need for these locations to take growth in order to meet the local need for housing and encourage growth within the community.

7.3.2 However, it is felt that additional new allocations to some of the locations which do not receive any within the local plan review would be beneficial for both the settlements and the wider plan's effectiveness. Namely, Poringland/Framingham Earl as the second largest Key Service Centre can accommodate additional levels of growth to boost the housing numbers in this tier and within the settlement. Given its location relative to Norwich and the facilities which are provided for within its confines, Poringland is an excellent candidate for additional growth through this plan despite the number which has already been attributed to it and could help bolster land supply with smaller sites that can demonstrate delivery now.

7.4 Question 45: Village Clusters

7.4.1 Gladman generally supports this division of the hierarchy and the settlements which are contained within it. However, we put forward that the level of growth identified for these settlements should be proportionate to the level of services available within the settlement and does not undermine the wider spatial strategy which centres on the most sustainable locations within the three Greater Norwich authorities.

7.5 Question 47: Small Scale Windfall Housing

7.5.1 Gladman believes that Policy 7.5 in reference to small scale windfall housing development should be redirected to refer to any sustainable settlement with reference to 'small scale' removed allowing for greater flexibility within the windfall provisions.

7.5.2 The Council should establish a positive policy framework for windfall development to come forward at suitable and sustainable locations adjoined to its named settlements. To guide this, Gladman recommends that the Council adopt the approach applied by Ashford Council through Policy HOU5 of the adopted Local Plan. Policy HOU5 applies a criterion-based approach towards windfall proposals enabling an uplift in housing land supply. This is however controlled to ensure that the overall spatial strategy is not undermined or prejudiced, and a sustainable pattern of development is secured. An extract of Policy HOU5 of the Ashford Local Plan is included in Appendix 1 of this representation.

8 CONCLUSIONS

- 8.1.1 Gladman welcomes the opportunity to comment on the draft Greater Norwich Local Plan and hopes that these representations are found to be constructive. Gladman requests to be added to the consultation database and updated on any future public consultations for the Greater Norwich Local Plan.
- 8.1.2 Greater Norwich is a key growth area in the East of England region. As such, it is critical that the new Local Plan for Greater Norwich is aspirational and pro-growth. The proposals identified for the strategic growth areas and the Tech Corridor will require transformational growth across the area. In reflection of this, Gladman considers that the proposed housing requirement for the GNLP must be economic led.
- 8.1.3 In terms of distributing the growth across the plan area, Gladman is supportive of proposals to direct development to the strategic growth corridor. However, it is equally important that scope is provided for all sustainable settlements to grow over the plan period in order to support rural centres, services and the economy, and to respond to the Climate Change agenda. It will also be important for the Councils to consider the location of growth in combination with existing and planned growth, and how the Plan's vision and objectives will be achieved. A combination of Options 2, 3, and 4 should therefore form the basis of the spatial strategy.
- 8.1.4 Gladman is supportive of proposals for 2,000 additional homes on sites on the edge of Norwich at Costessey and at Wymondham, however consider that both should be advanced as formal allocations for housing land available for development now in order to provide greater certainty that housing requirements will be met and to provide for greater flexibility in the housing land supply. Gladman considers that further allocations are required at Diss and Poringland, where minimal growth is currently identified, in order to support the continued role, vibrancy and vitality of these settlements and to meet local housing need.
- 8.1.5 Gladman looks forward to engaging with the Councils further on future iterations of the Local Plan and would welcome the opportunity to work alongside the Council through this process. Should the Council wish to discuss any of the content of this representation further then please do not hesitate to contact a member of the Gladman team.

Appendix 1

Ashford Local Plan Policy HOU5 Extract

Policy HOU5

Residential Windfall Development in the Countryside Proposals for residential development adjoining or close to the existing built up confines of the following settlements will be acceptable: Ashford, Aldington, Appledore, Bethersden, Biddenden, Brabourne Lees/Smeeth, Challock, Charing, Chilham, Egerton, Great Chart, Hamstreet, High Halden, Hothfield, Kingsnorth, Mersham, Pluckley, Rolvenden, Shadoxhurst, Smarden, Tenterden (including St Michaels), Wittersham, Woodchurch and Wye.

Providing that each of the following criteria is met:

- a) The scale of development proposed is proportionate to the size of the settlement and the level, type and quality of day to day service provision currently available and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in this Local Plan and committed development in liaison with service providers;
- b) The site is within easy walking distance of basic day to day services in the nearest settlement, and/or has access to sustainable methods of transport to access a range of services;
- c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area;
- d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services;
- e) The development must conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality; and,
- f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements:
 - i) it sits sympathetically within the wider landscape,
 - ii) it preserves or enhances the setting of the nearest settlement,
 - iii) it includes an appropriately sized and designed landscape buffer to the open countryside, it is consistent with local character and built form, including scale, bulk and the materials used, it does not adversely impact on the neighbouring uses or a good standard of amenity for nearby residents, it would conserve biodiversity interests on the site and / or adjoining area and not adversely affect the integrity of international and national protected sites in line with Policy ENV1.