

13<sup>th</sup> March 2020  
CAPL367778/A3/JD



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Dear Sirs,

**GREATER NORWICH LOCAL PLAN  
REGULATION 18 CONSULTATION – STAGE C DRAFT STRATEGY & SITE ALLOCATIONS  
29 JANUARY – 16 MARCH 2020**

Savills (UK) Ltd are instructed on behalf of Barratt David Wilson (BDW) Homes (Eastern Counties) to submit representations to the consultation on the draft Greater Norwich Local Plan (GNLP) and accompanying evidence base, including in respect of land south of Green Lane, Horsford (site ref. GNLP2160). This letter, along with the enclosed documents comprises our representations to the current consultation.

Please note that we have previously promoted the site as having the capacity to accommodate 500 new homes, not the 600 that has been recorded and is referenced in the Sites Assessment Booklet. However, following further technical work, the site is now being promoted for c. 350 new homes, together with additional recreation facilities, as outlined in the **Vision Document** that accompanies these representations.

Once you have had time to discuss the site to consider these representations, we would welcome the opportunity to meet with you to discuss the site further, especially the contribution that it can make to the early and continued delivery of much-needed housing (including affordable housing) on a site that has no over-riding constraints.

**Context**

As confirmed by the representations submitted during the previous consultations, which ran between January and March 2018, and November and December 2018, the land adjacent to this site has full planning permission for residential development. The approved development also under the ownership of BDW, is known interchangeably as Horsford Phase 2, Kingfisher Meadows, and Land east of Holt Road, Horsford, and is currently under construction.

**Section 1 – Introduction**

The consultation asks:

**Question 1. Is the overall purpose of this draft plan clear?**

We set out the context for, and our response to this, below:

With regard to ‘the plan-making framework’, the National Planning Policy Framework (NPPF) (para. 17) states:

*“The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area.*

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*These strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. They can be contained in:*

- a) joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies) ...”*

With regard to ‘strategic policies’, the NPPF (para. 20) states:

*“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

- a) housing (including affordable housing) ...”*

The NPPF (para. 23) continues:

*“... Strategic policies should provide a clear strategy for bringing sufficient land forward ... to address objectively assessed needs over the plan period ... This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area ...”*

In short, the strategic policies in a Development Plan needs to identify the objectively assessed housing need / housing requirement, and allocate sufficient sites to deliver this need / requirement.

The second paragraph of the ‘Introduction’ (p6) to the draft GNLP states (our emphasis):

*“In the Greater Norwich area Broadland District Council, Norwich City Council and South Norfolk Council are working together to produce a single plan. ...”*

Noting the requirements of the NPPF as outlined above, the draft GNLP (para. 4) states:

*“The Greater Norwich Local Plan (GNLP) therefore not only provides the planning strategy, it also identifies the sites to meet Greater Norwich’s growth needs from 2018 to 2038 sustainably.”*

With regard to how the GNLP will relate to other, adopted ‘local plan documents’, it explains (para. 18) that (our emphasis):

*“When adopted, the GNLP will supersede the current JCS [Joint Core Strategy] and the Site Allocations documents in each of the three districts. The great majority of the undeveloped sites in the Site Allocations plans are re-allocated through the GNLP.”*

However, it then states (para. 24):

*“With the exception of sites in smaller villages in South Norfolk (see below), the Draft GNLP Sites document details the proposed sites for growth. This includes those that have already been identified which are being carried forward, together with new ones.”*

As noted above, the NPPF requires that strategic policies allocate sufficient sites. Simply, it would appear that the draft GNLP does not allocate sufficient sites, but defers the allocation of some sites to another plan. In this regard, the draft GNLP conflicts with national policy.

The draft GNLP continues (para. 25) (our emphasis):

*“In South Norfolk there are more villages clustered around more primary schools. South Norfolk Council therefore intend to prepare a separate village clusters plan covering new sites for small-scale housing in the rural parishes that collectively form primary school clusters. The Council aims to progress this South Norfolk Village Clusters Housing Site Allocations document as quickly as possible. This GNLP*

*strategy identifies that sites for a minimum of 1,200 additional homes on top of existing commitment of 1,349 homes will be allocated in the South Norfolk plan.”*

The draft GNLP therefore does not do what it says it does.

As noted above, it sets out (p6) that the three Districts are working together to produce ‘a single plan’, whereas it transpires that they are working together to produce a partial plan with South Norfolk District Council producing the other part on its own.

It also states (para. 4) that the draft GNLP not only provides the planning strategy, but also identifies the sites to meet the identified needs. Clearly, it does not.

It further states (para. 20) that it will ‘supersede the current JCS and the Site Allocations documents in each of the three districts’. In South Norfolk, it will not.

Without sight of the ‘South Norfolk Village Clusters Housing Site Allocations’ document it is impossible to know whether sufficient sites will be found for the 1,200 new homes assigned to that area / document; there is no evidence to suggest that the figure will not be different. Nor is there any evidence to demonstrate that these sites will represent a sustainable pattern of development or, as required by the NPPF (para.35), an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Notably, the report seeking the GNLP Board’s approval of the draft GNLP (as presented to the Board on 6<sup>th</sup> January 2020) noted (para. 1.6) that:

*“Further work is required to find suitable sites for housing in smaller villages across South Norfolk to support local schools, shops, pubs and post offices without overwhelming local services and facilities. South Norfolk Council therefore intend to prepare a South Norfolk Village Clusters Housing Allocations Document.”*

In short, the draft GNLP states that ‘South Norfolk Village Clusters Housing Site Allocations’ document will deliver 1,200 new homes knowing that insufficient sites have so far been found.

**Representation to Question 1: Object / Comment:**

**The draft GNLP therefore does not do what it says it does – it is not a single plan for the Greater Norwich area, prepared jointly by the three Districts.**

**Without sight of the ‘South Norfolk Village Clusters Housing Site Allocations’ document:**

- **it is impossible to know whether sufficient sites will be found for the 1,200 new homes assigned to that area / document; and**
- **there is no evidence to demonstrate that overall pattern of development will be an appropriate and sustainable strategy, taking into account the reasonable alternatives, based on proportionate evidence.**

**Section 5 – The Strategy**

Policy 1 – The Sustainable Growth Strategy

*Distribution of Development*

The consultation asks:

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

We set out the context for, and our response to this, below:

The 'growth strategy' set out (para. 163) in the draft GNLP (our emphasis):

- a. *Maximises brownfield development and regeneration opportunities, which are mainly in Norwich. The brownfield/greenfield split for new homes in the plan is 27%/73%;*
- b. *Broadly follows the settlement hierarchy set out in policy 1 (the Norwich urban area; main towns; key service centres and village clusters) in terms of scales of growth as this reflects access to services and jobs;*
- c. *Focusses most of the growth in locations with the best access to jobs, services and existing and planned infrastructure in and around the Norwich urban area and the Cambridge Norwich Tech corridor;*
- d. *Focusses reasonable levels of growth in the main towns, key service centres and village clusters to support a vibrant rural economy. The approach to village clusters is innovative. It reflects the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages;*
- e. *Allocates strategic scale housing sites (1,000 dwellings +) in accessible locations;*
- f. *Allocates a significant number of medium scale and smaller scale sites in the urban area, towns and villages, providing a balanced range of site types to allow for choice, assist delivery and allow smaller scale developers and builders into the market. Overall, 12% of the homes allocated through the plan are on sites of no larger than 1 hectare, meeting national requirements;*
- g. *Sets a minimum allocation size of 12-15 dwellings to ensure that a readily deliverable amount of affordable housing is provided on all allocated sites."*

The 'alternative approaches' (p54) explain that:

*"... The consultation in early 2018 on Growth Options (see pages 31 to 35) identified six reasonable alternatives:*

- Option 1 - Concentration close to Norwich*
- Option 2 – Transport corridors*
- Option 3 – Supporting the Cambridge to Norwich Tech Corridor*
- Option 4 - Dispersal*
- Option 5 – Dispersal plus New Settlement*
- Option 6 – Dispersal plus Urban Growth*

*The preferred option in this plan combines concentration of most of the development in and around Norwich and on the Cambridge Norwich Tech Corridor, with an element of dispersal to villages to support thriving rural communities. ..."*

Overall, the proposed distribution of growth, including the focus on the area around Norwich, is considered to be the most appropriate strategy, and is supported.

Quantitatively, the draft GNLP proposes (Table 7) the following distribution of housing:

Area	No. Homes (2018)	No. Homes (GNLP)	Percentage Increase
Norwich urban area	106,100	+30,560	29%
Main towns	19,400	+6,342	33%
Key service centres	15,900	+3,417	21%
Village clusters	46,100	+4,024	9%

The draft GNLP sets out (Table 1) that largest settlements, by population within the Greater Norwich area are:

Settlement	Population 2011 census
Norwich urban area	213,166
Wymondham	14,405
Diss	7,572
Aylesham	6,016
Hethersett	5,691
Poringland (including Framlingham Earl)	4,826
Harleston	4,641
Long Stratton	4,425
Horsford	4,163
Brundall	4,019
Blofield	3,316
Acle	2,824
Reepham	2,709
Hingham	2,367
Loddon and Chedgrave	2,284
Wroxham	1,502

It also sets out a proposed 'settlement hierarchy' comprising:

1. The Norwich urban area
2. The main towns
3. The key service centres
4. Village clusters

Whilst noting that population alone is not necessarily a determiner as to what tier of the hierarchy a settlement should be placed within, when the hierarchy is applied to list of the largest settlements, it is generally that the larger a settlement the higher the tier it falls within:

Settlement	Population 2011 census	Settlement Hierarchy Tier			
Norwich urban area	213,166	1			
Wymondham	14,405		2		
Diss	7,572		2		
Aylesham	6,016		2		
Hethersett	5,691			3	
Poringland (including Framlingham Earl)	4,826			3	
Harleston	4,641		2		
Long Stratton	4,425		2		
Horsford	4,163				4
Brundall	4,019			3	
Blofield	3,316			3	
Acle	2,824			3	
Reepham	2,709			3	
Hingham	2,367			3	
Loddon and Chedgrave	2,284			3	
Wroxham	1,502			3	

What is not clear is why Horsford – the ninth largest settlement in the entire (three-district) Greater Norwich area, is the only settlement list in Table 1 that is not within the top three tiers of the hierarchy. The village has grown substantially over recent years, with the last decade of growth not being reflected in the above figures, and is continuing to grow.

Combined, three planning permissions relating to the land adjacent and to the south of the promotion site (refs: 2013/0547, 2016/1770 and 2019/0999) have permitted a total of 429 new homes, with 212 homes completed by March 2020 (see the section on ‘delivery’ below). Together these new homes will increase the population of Horsford by over 1,000, quite possibly elevating it yet further in the list of the largest settlements.

As noted above and explained in respect of ‘delivery’ below, it is projected that delivery of the adjacent site will be complete by the end of 2023, with an average of around 40 new homes per annum having been built and sold by then over the preceding decade (i.e. 2013 – 2023).

The suggestion therefore in the draft GNLP (as set out in the ‘Site Allocations’ document that forms the latter part of the draft GNLP) that additional residential development in Horsford will be limited to only 20-50 new homes over the subsequent 15 years (i.e. between 2023 and 2038) would appear at odds with the requirement in the NPPF that development plans be ‘positively prepared’, and a failure to continue with what has proved to be a very successful and consistent source of housing delivery.

Instead, it would appear far more representative of positive planning, and a justified and effective strategy, to recognise and reflect the recent growth of Horsford and to provide for further growth to yet further improve the sustainability of the village.

It would be wrong for the GNLP, in planning for the next two decades, to fail to reflect this growth in population and plan properly for the needs of the growing community. Together with the recent and continued growth (the remaining permitted development is projected to be complete by the end of 2023), additional housing growth could help support existing and new facilities and enable the village to become even more sustainable.

With respect to locational sustainability, Horsford is currently identified in the JCS as a Service Village, where there is a good level of services and facilities. Moreover, the JCS identifies that Horsford is located within the Norwich Policy Area, where additional development might be considered acceptable.

This was most recently reflected in the grant of planning permission (ref. 2019/0999) for 45 additional homes on land immediately adjacent to the promotion site, with the planning committee report concluding (para. 5.11) (our emphasis):

*“Notwithstanding there is no demonstrable deficit in the supply of housing land within the Greater Norwich Policy Area, it is considered that Horsford is a sustainable location for additional residential development ...”*

This additional 45 homes increases the number of homes currently being built on the land adjacent to the promotion site to 304.

Similar conclusions were reached in respect of the permission on the site to the south (ref. 2013/0547) for 125 dwellings, and in respect to the underlying permission (ref. 2016/1770) for 259 dwellings (committee report, para 9.44):

*“... Horsford is a sustainable location for new development given the level of services which it offers ...”*

By the end of 2023, Horsford will have a population of around 5,000<sup>1</sup> or more. The draft GNLP proposes that only a single site (ref. GNLP0264) in Horsford be allocated for housing development, for 30-40 dws, which will

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<sup>1</sup> 429 new homes @ 2.3 people per dwelling = 987, plus 2011 census population of 4,163 = 5,150 people

provide new homes for only around 80 people. This will represent a growth rate over the latter 15 years of the plan period (2023-38) of just 1.6%, in the largest village cluster, that is acknowledged by the LPA to be a 'sustainable location for additional residential development'.

It is considered that this is not positive planning.

**Representation to Question 13: Support / Object / Comment:**

**Overall, the proposed distribution of growth, including the focus on the area around Norwich, is considered to be the most appropriate strategy, and is supported.**

**However, the limited amount of growth assigned to Horsford (at just 1.6% over the later 15 years of the plan period), which despite being a village cluster, is the ninth most populous settlement across all three Districts, and recognised as being a sustainable location for additional residential development, is not supported.**

**It would be far more representative of positive planning, and a far more justified and effective strategy, to recognise and reflect the recent growth of Horsford and to provide for further growth to yet further improve the sustainability of the village.**

*Housing Requirement*

The consultation asks:

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

We set out the context for, and our response to this, below:

We note that the draft GNLP includes provision for the minimum housing requirement (calculated in accordance with the standard method for calculating Local Housing Need as set out in the NPPF and associated PPG) with a buffer of 9%.

However, the NPPF explains (para. 60) that the housing requirement to be set out in strategic policies (our emphasis):

*“... should be informed by a local housing need assessment, conducted using the standard method ...”*

Adding to this, the PPG (ID: 68-001-20190722) explains that the standard method:

*“... provides a minimum number of homes to be planned for ...”*

that (ID: 2a-002-20190220) the method:

*“... addresses projected household growth and historic under-supply ...”*

and again (ibid) that it only (our emphasis):

*“... identifies a minimum annual housing need figure .... It does not produce a housing requirement figure.”*

The draft GNLP skips around this issue and never fully addresses what it considers the 'housing requirement' should actually be. Table 6 sets out the calculated housing need (based on the standard method) of 40,541 new homes and then states a 'total housing figure' of 44,343. Policy 1 then requires the delivery 'of':

*“... to meet the need for around 40,550 new homes, sites are committed for a minimum of 44,340 new homes ...”*

It would appear that the draft Plan is proposing a housing requirement of 44,340 homes over the 20-year plan period – an average of 2,217 dpa, with this then being the requirement against which delivery will be assessed. Alternatively, the wording of Policy 1 could be interpreted such that the requirement is intended to be 40,550 homes – an average of 2,028 (rounded up) dpa. This point should be clarified in any future draft of the GNLP.

The draft GNLP explains (Table 6 and para. 158) that the inclusion of the ‘buffer’ is to “... ensure delivery ...”, no mention is made of seeking to support ‘growth’. The PPG explains (ID: 2a-010-20190220):

*“When might it be appropriate to plan for a higher housing need figure than the standard method indicates?”*

*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. ... there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”*

In opening, the Foreword to the draft GNLP (p5) states (our emphasis):

*“Our strong local economy is set to grow significantly over the coming years ...”*

whilst the supporting text to Policy 1 (para. 144) explains (our emphasis):

*“... It aims to make the most of Greater Norwich’s substantial economic growth potential to develop its leading role in the national economy ...”*

Hence there is a conflict in the GNLP between i) the desire to ‘drive economic growth’ and ii) the provision of only the minimum number of new homes (as calculated in accordance with the standard method – see above).

**Representation to Question 14: Object / Comment:**

**There is a conflict in the GNLP between i) the desire to ‘drive economic growth’ and ii) the provision of only the minimum number of new homes.**

Policy 2 – Sustainable Communities

**Question 18. Do you support, object or wish to comments relating to the approach to sustainable communities including the requirement for a sustainability statement?**

**Question 19. Do you support, object or wish to comments relating to the specific requirements of the policy?**

We set out the context for, and our response to this, below:

The draft GNLP (Policy 2, criterion 10, second bullet point) requires that:

*“... All new development will provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016) ...”:*

The supporting text (Table 8) explains that:



*“This approach to energy in new developments is required as:*

- *Evidence\* shows that a positive approach to promoting energy efficiency ... is required to address local energy network capacity constraints and to ensure the timely delivery of growth*

*...*

*Policy 2 therefore establishes standards for energy efficiency in new housing and non-housing development. Further detail on how this will be achieved will be set out in a future Energy Policy Implementation Note or SPD. This approach is deliberately flexible as:*

- *The defined standards are not prescriptive. They allow for either a “fabric first” approach to reducing energy use, which on many types of site tends to be cheaper, or the use of on-site sustainable energy, or a mixture of both ...”*

\* Footnote 65 to the text in the tables references the ‘Greater Norwich Energy Infrastructure Study’ (March 2019).

Within the ‘alternative approaches’ set out (p63), it is likewise states that:

*“The evidence and justification establish a clear need to set a local energy efficiency policy which goes beyond 2013 Building Regulations.”*

However, with regard to ‘potential planning policy measures’, the ‘Greater Norwich Energy Infrastructure Study’ in fact concludes (para. 5.4.1), in respect to the aim to ‘minimise energy demand of the new development’ that (our emphasis):

*“New residential ... developments need to meet Part L building regulations relevant at the time of construction ...”*

It would thus appear that the requirements of the policy are not supported by the evidence that the policy relies upon.

The ‘alternative approaches’ set out (p63) in the draft GNLP explain that:

*“It is not possible to set a greater percentage requirement for energy efficiency than 20%, or to require a stepped approach to require all development to be carbon neutral by a specific date. Since the cost of this for housing development is likely to be at least £15,000 per dwelling, viability testing has concluded that such an approach could not be taken in Greater Norwich, so is not a justified alternative. ...”*

The first and most obvious question that arises from the above statement is – ‘what’ will cost ‘at least £15,000 per dwelling’? Is it the requirement for a greater than 20% reduction against Part L of the Building Regulations, a requirement that all development be carbon neutral, both, or something else. This requires clarification.

Also concerning is that the ‘alternative approaches’ text suggests that any more than a 20% reduction (e.g. a 21% reduction) would be universally unviable, but that a 20% reduction will be viable – this suggests that the policy is requiring a reduction that will result in all housing developments being very close to being, and thus potentially, unviable. This statement therefore requires amplification.

Why do the alternative approaches not include the possibility of a reduction of less than 20%, especially given the actual conclusions of the Energy Infrastructure Study?

#### **Representation to Question 18 / 19: Object / Comment:**

**The requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not supported by the evidence that the policy relies upon.**

**There is no justification for the lack of any alternative approaches.**

## Policy 5 – Homes

### *Affordable Homes*

The consultation asks:

#### **Question 27. Do you support, object or wish to comments relating to the approach to affordable homes?**

We set out the context for, and our response to this, below:

The draft GNLP (Policy 5) requires that:

*“Major residential development proposals and purpose-built student accommodation will provide:*

- *at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28%, unless the site is allocated in this plan or a Neighbourhood Plan for a different percentage of affordable housing.”*

The supporting text (para. 240) explains that:

*“The policy sets a general requirement for on-site affordable housing provision of 33% on sites that show better viability based on local evidence, with a lower requirement in Norwich City Centre. This is based on:*

- *The Strategic Housing Market Assessment 2017 which identifies a need for 11,030 affordable homes in Greater Norwich from 2015 to 2038, 28% of the total housing need identified at that point;*
- *Under national policy, small sites under 10 dwellings are not required to provide affordable housing. Larger sites will therefore have to ensure that overall affordable housing need is delivered;*
- *The most recent viability study findings which conclude that centrally located brownfield sites which have higher development costs which affect viability are generally able to provide 28% affordable housing;*
- *Some specific sites have very high costs associated with development. These are allocated with lower affordable housing requirements.”*

The requirement for 28% affordable housing is based on the conclusions of the SHMA (June 2017), which identified (Figure 83) a need for 11,030 affordable homes out of a total requirement of 39,486 homes across the Greater Norwich Area over the 21-year period 2015-36, or 526 (rounded up) affordable homes per annum out of a total requirement of 1,881 (rounded up) dpa.

The housing requirement proposed in the draft GNLP is (see above) 2,217 dpa, some 17.8% (226 dpa) higher than the annual average need identified in the SHMA.

If a 28% requirement were applied to the full planned provision of 2,217 dpa it would deliver 621 (rounded up) affordable homes per annum. Noting that the requirement won't apply to sites of less than ten dwellings, if 10% were built on sites of less than ten dwellings, 559 (rounded up) affordable homes per annum would still be delivered. If the 33% requirement were applied to 70% of sites, the 28% requirement to 20% of sites, and 10% of sites exempt, 637 (rounded up) affordable homes per annum would be delivered, some 20+% (110 dpa) more than required / justified.

The third bullet point in para. 240 provides some justification for the application of a 28% requirement to sites in Norwich City Centre, but neither the policy nor the supporting text, nor the SHMA provide any quantitative justification for the proposed requirement for 33% on other sites.

The reference to 'at least' 33% adds further confusion – is this intended to simply require the rounding-up of a calculated percentage or a substantially greater provision?

The 'alternative approaches' set out (p83) in the draft GNLP explain that:

*"... the affordable housing elements of the policy are based on local evidence of need ... so no alternative approach has been identified."*

As discussed above, contrary to the assertion in the 'alternative approaches' text, there is no evidence to support the requirement for 33% affordable housing on the vast majority of sites. Given this lack of evidence for the proposed approach, it is particularly unreasonable for no alternative approach to be mooted.

**Representation to Question 27: Object / Comment:**

**There is no evidence or justification for the proposed 33% requirement as set out in the draft Policy.**

**Given the lack of evidence for the proposed approach, it is particularly unreasonable for the GNLP to not put forward any alternative approach.**

**The reference to 'at least' requires clarification.**

*Space Standards*

The consultation asks:

**Question 28. Do you support, object or wish to comments relating to the approach to space standards?**

We set out the context for, and our response to this, below:

The draft GNLP (Policy 5) requires that:

*"All housing development proposals must meet the Government's Nationally Described Space Standard for any internal space or any successor."*

The supporting text (para. 244) explains that:

*"Based on local evidence of need, viability and timing and to ensure that new housing provides for a good quality of life, the policy requires housing development across Greater Norwich to meet nationally defined minimum space standard for different types of homes."*

Footnote 84 explains that the 'local evidence of need, viability and timing' is as contained in the 'Greater Norwich Local Plan Nationally Described Space Standards Study' (August 2019), which is included as Appendix B to the 'Greater Norwich Local Plan Interim Viability Study' (November 2019), which is part of the evidence base to the draft GNLP.

The NPPF (para. 127) sets out that:

*"Planning policies and decisions should ensure that developments:*

*...*

*f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users ..."*

Footnote 46 to criterion (f) explains that:

*"... Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified."*

The 'alternative approaches' set out (p83) in the draft GNLP explain that:

*“National planning policy is clear that the nationally described space standards can be applied where the need for an internal space standard can be justified.”*

BDW are concerned that the impact on the cost to purchasers of new homes has not been properly considered.

Whilst the Study discusses, in the round, the potential risk to the viability of housing developments and housing delivery rates, it skips lightly over the potential impact on sales prices, simply stating (in conclusion) [no para or page numbers] (our emphasis):

*“... The change would be unlikely to push down developer profit to an unreasonable level. It is possible too that the costs of building to the NDSS could be recouped in either higher sales values or, like other planning requirements, reflected in the price paid for land.”*

This statement is included without reference or justification, with the use of the terms 'unlikely' and 'possible' indicating the GNLP does not have the required justification of need (as per the PPG – ref. ID: 56-020-20150327).

The 'alternative approaches' text (ibid) goes on to state that:

*“... Local evidence shows that 75% of homes in Greater Norwich were delivered to these standards between 2016 and 2018. The requirement is therefore considered deliverable. Setting a lower percentage than 100% could be an alternative approach but is not preferred as minimum space standards are considered necessary to support a good quality of life for residents of new homes.”*

The draft GNLP does not explicitly suggest an 'alternative' approach, but intimates that this would be a 'lower percentage'. It states that this is not the preferred approach as the minimum space standards are 'considered necessary'. This suggests that a different, considered, conclusion could be reached.

Further, if the minimum space standards are 'necessary' to support a good quality of life, then it would suggest that all homes not built to the standards over recent years do not support a good quality of life.

#### **Representation to Question 28: Object / Comment:**

**Overall, it is evident that the requirement in Policy 5 of the GNLP that all new homes must meet the Government's Nationally Described Space Standard for any internal space, has not been properly and sufficiently justified.**

#### **Section 7 - Strategy for the Areas of Growth**

##### Policy 7.4 – The Village Clusters

The consultation asks:

**Question 45. Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.**

**Question 46: Do you support or object or wish to comment on the approach for specific village clusters? Please identify particular issues**

**Representation to Question 28: Object / Comment:**

**We reiterate, in respect to these questions, the points that we make above in respect to the village clusters and Horsford in particular above, in respect to Policy 1 / The Distribution of Development / Question 13.**

**We also reiterate our comments below in respect of the Site Allocations / Site Assessment Booklet – i.e. Part / Document 2 of the draft GNLP.**

**Site Allocations**

The ‘Sites Assessment Booklet’ for Horsford states:

*“HORSFORD, FELTHORPE AND HAVERINGLAND*

*The catchment of Horsford Primary School brings Horsford, Felthorpe and Haveringland into a village cluster. The school currently has limited capacity.*

*It is considered that as well as existing commitments and windfall development, approximately 20-50 new homes are appropriate for the Horsford cluster. In addition to the primary school, services include a shop, doctor’s surgery, village hall, library and public house.”*

The introduction to the Site Assessment Methodology, states (para. 1.5):

*“The scale of growth proposed within each ‘village cluster’ reflects school capacity or ability or grow, plus the availability of other accessible services. Taking account of the timescales for delivery and other uncertainties, such as pupil preference, it has been assumed that a minimum scale of allocation (12-20 dwellings) can be accommodated in all clusters if appropriate sites are available. To guide development all village clusters have been rated ‘red’ (12- 20 dwellings), ‘amber’ (20-50 dwellings) or ‘green’ (50-60 dwellings) based on information provided by Children’s Services, although this is a starting point and there is flexibility within these ratings, depending upon the quality of sites and the circumstances of individual schools.”*

As a methodology, this statement is distinctly insufficient and places undue and unjustified emphasis on unpublished advice from ‘Children’s Services’.

With the Booklet stating that ‘it is considered that ... approximately 20-50 new homes are appropriate’ for Horsford, it is assumed that the village has been rated ‘amber’ “based on information provided by Children’s Services’.

There is no other justification as to how the GNLP has arrived at the figure of ‘20-50’ for Horsford.

**Land to the south of Green Lane, Horsford (Site Ref. GNLP2160)**

The Housing and Economic Land Availability Assessment (HELAA) for the Greater Norwich Area comprises three ‘volumes’:

- The December 2017 HELAA;
- The October 2018 HELAA Addendum I, and
- The January 2020 HELAA Addendum II.

There is no overlap between the three volumes – i.e. a site appearing in one does not appear in either of the other two.

As set out in Planning Practice Guidance (PPG) (ID: 3-001-20190722):

*“An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.*

...

*However, the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority’s ... requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements.”*

In each of the HELAA volumes, sites are assessed against a range of criteria and scored ‘red’, ‘amber’ or ‘green’. In each case, the site was scored based on the information available to the GNDP at the time the assessment was carried out. As set out in the original December 2017 HELAA (para. 2.20):

*“The methodology states that if a site is assessed as red against any type of constraint or impact then it will be discounted and the site will not be considered suitable for development for the purposes of the HELAA assessment. Sites assessed as amber against any type of constraint or impact will be considered as potentially suitable providing that the constraint or impact could be overcome and the green category represents no constraint or impact.”*

The HELAA goes on to state (para. 7.5), as do the Addenda:

*“The HELAA presents a snapshot of the position at a particular point in time and will need to be updated regularly as plan preparation progresses.”*

Our client’s site, known as Horsford Phase 3, (land south of Green Lane) (Site Ref. GNLP2160) was included in the Regulation 18 consultation carried out in late 2018 on ‘new, revised and small sites’. This consultation was essentially a consultation on the GNDP’s assessment of the 200+ sites submitted for consideration since December 2017 as contained in October 2018 HELAA Addendum I.

In that Addendum, our client’s site was scored as follows:

Constraints Analysis

- Access Amber
- Accessibility to Services Green
- Utilities Capacity Amber
- Utilities Infrastructure Amber
- Contamination and Ground Stability Green
- Flood Risk Amber
- Market Attractiveness Green

IMPACTS ANALYSIS

- Significant Landscapes Amber
- Townscapes Amber
- Biodiversity and Geodiversity Amber
- Historic Environment Amber
- Open Space and GI Green
- Transport and Roads Amber
- Compatibility with Neighbouring Uses Green

Savills submitted representations to the 2018 consultation and addressed each of the criteria on which the site had been scored ‘amber’ as set out below. To this has been added further comment in respect to ‘Significant Landscapes’ and ‘Townscapes’. Given that the studies submitted in 2018 identified the capacity to accommodate 500 new homes, there is clearly capacity to accommodate the 350 new homes now being promoted.

### *Access / Transport & Roads*

The access to the promoted site would be from the existing adjacent development, with the access to the promoted site having capacity to serve an additional 500 homes (see **Highway Capacity Assessment** enclosed herewith); additional traffic surveys would be carried out prior to / as part of any future development proposal.

All of the access infrastructure required to serve the promoted site is thus already approved / in place or controlled by BDW. Additional pedestrian, cycle and emergency accesses would also be provided as indicated in the Vision Document enclosed herewith.

**On this basis, it is suggested that the constraints analysis for 'Access' is re-categorised to 'green' in the suitability assessment of the site.**

### *Accessibility to Services*

Although the constraints analysis already categorises the site as 'green' in this regard, further work (see **Education Report** enclosed herewith) has been undertaken by BDW to confirm that there is capacity on the site of the existing primary for the school to be expanded to accommodate another form of entry.

**That there is sufficient capacity to expand the school and that that the school is adjacent to the site, serves to further reinforce the 'green' categorisation already assigned, and reinforce the site's sustainability credentials.**

### *Utilities*

(See **Utilities and Drainage Review** enclosed herewith.)

With regards to utilities (capacity and infrastructure), foul water drainage has been accommodated for as part of the existing adjacent development with an adoptable pumping station, with the ability to receive pumped flows from 500 homes.

With regard to electricity supply, the High Voltage Network was extended as part of the existing adjacent development to serve the new substation. This has again been designed to accommodate a further development of 500 homes.

There is also sufficient gas supply, with offsite works completed as part of the existing adjacent development, which can accommodate the supply for a further 500 homes.

**On this basis, it is suggested that both the constraints analysis for 'Utilities Capacity' and 'Utilities Infrastructure' are both re-categorised to 'green' in the suitability assessment of the site.**

### *Drainage / Flood Risk*

With regard to flood risk, the promoted site is wholly located within Flood Zone 1 according to the Environment Agency Flood Mapping.

The maps also show that the site is not at risk from surface water flooding. Infiltration testing has taken place by BDW on both adjacent sites, with all studies to date indicating that the same approach could be taken to draining the promoted site (see **Utilities and Drainage Review** enclosed herewith).

**On this basis, it is suggested that the constraints analysis for 'Flood Risk' is re-categorised to 'green' in the suitability assessment of the site.**

### *Significant Landscapes / Townscapes*

The **Landscape and Visual Appraisal (LVA)** (enclosed herewith) concludes that:

- The promoted site is not covered by any designations for landscape character or quality, nor is it identified in the existing Local Plan for its character or landscape quality. It is not publically accessible and does not contain or lie in proximity to any designated heritage assets.
- The promoted site could not be considered to form part of a Valued Landscape for the purposes of Paragraph 170 of the NPPF.
- The promoted site is very well contained by dense woodland to the north and east, and existing built form to the south and west, resulting in very few opportunities to view the site from its surroundings.
- Given the visual containment of the promoted site, public views of the new houses will be limited to filtered views from Mill Lane and Green Lane, with retained boundary vegetation and new structural planting to these boundaries increasingly filtering and screening these views as it matures.

Overall, the LVA concluded:

*“The assessment found that the proposed development would be compatible with the surrounding and planned development on the northern edge of Horsford, set within an established landscape framework of mature trees and surrounding woodland. In summary, the Site is capable of accommodating development in line with that shown on the Concept Masterplan, without resulting in significant harm to the local landscape character, or views from the surrounding area.”*

**On this basis, it is suggested that the impact analysis for ‘Significant Landscapes / Townscapes’ is re-categorised to ‘green’ in the suitability assessment of the site.**

### *Biodiversity and Geodiversity*

The Vision Document shows how the development of the site could deliver a new Nature Park to the north of Green Lane to enhance the existing natural environment, whilst also creating new community public open space. There would be further opportunities to create a net gain in biodiversity through the creation of new habitats within and around the site.

With the knowledge of the site and surrounding area gleaned from the development of the two adjacent sites, and the Ecological Study undertaken by TMA in relation to the promoted site (see enclosed **Ecological Report** dated December 2018) there are no likely significant adverse impacts that would arise off-site, especially given the proposed creation of the new Nature Park.

**On this basis, it is suggested that the impact analysis for ‘Biodiversity and Geodiversity’ is re-categorised to ‘green’ in the suitability assessment of the site.**

### *Historic Environment*

As set out in the **Cultural Heritage Desk-Based Assessment** (enclosed herewith), there are no World Heritage Sites, Historic Battlefield sites or Historic Wreck sites within the vicinity of the promotion site. The Scheduled Monument ‘Two round barrows on Horsford Heath’ (NHLE ref.1003164) lies a short distance north-west of the site, enclosed by a woodland. However, there is no inter-visibility between the site and the Scheduled Monument due to the extent of intervening woodland, and thus the site is not an element in how the significance of the Scheduled Monument is experienced. Overall, it is



considered that the residential development of the site would represent an alteration of the extended rural setting of the Scheduled Monument, but an alteration that would not have the potential to alter its significance.

With regard to built heritage, there are no such assets located within the site and the site does not have a visual, functional or historical relationship with, nor does it contribute to the setting, of any nearby assets.

**On this basis, it is suggested that the impact analysis for ‘Historic Environment’ is re-categorised to ‘green’ in the suitability assessment of the site.**

*Transport & Roads*

See ‘Access’ above.

**On this basis, it is suggested that the constraints analysis for ‘Transport and Roads’ is re-categorised to ‘green’ in the suitability assessment of the site.**

*Summary*

The re-categorisation of the site’s constraints / impacts analysis as discussed above **would result in all of the constraints analysis criteria being ‘green’**, with more of the impacts analysis criteria also now being ‘green’. The lack of any ‘red’ and a low number of ‘amber’ scores on the assessment, shows that the site is suitable for residential development.

In summary, based on the additional information that we provided to the 2018 consultation, the site should have been reappraised (subject to the potential for the GNDP disagreeing with the information provided) as follows:

Constraints Analysis

• Access	Amber	Green
• Accessibility to Services	Green	Green
• Utilities Capacity	Amber	Green
• Utilities Infrastructure	Amber	Green
• Contamination and Ground Stability	Green	Green
• Flood Risk	Amber	Green
• Market Attractiveness	Green	Green

IMPACTS ANALYSIS

• Significant Landscapes	Amber	Green
• Townscapes	Amber	Green
• Biodiversity and Geodiversity	Amber	Green
• Historic Environment	Amber	Green
• Open Space and GI	Green	Green
• Transport and Roads	Amber	Green
• Compatibility with Neighbouring Uses	Green	Green

However, despite the HELAA explicitly recognising and stating that it only represents “...a snapshot of the position at a particular point in time and will need to be updated regularly as plan preparation progresses ...” the GNDP has not sought to update any of the HELAA assessments carried out to date; in essence, the HELAA ignores all of the additional information submitted through previous consultations. On this basis alone, Savills would contend that the conclusions of the individual site assessments as contained in the HELAA cannot be relied upon as being accurate.

Instead, the Site Assessment Booklet states:

*“This site is not considered to be reasonable for allocation as the scale of the proposal is a concern with a lack of safe walking / cycling route to the catchment high school. Development would require highway improvements and it is unlikely that a satisfactory access strategy would be able to be developed for the entire level of development. There are also ongoing concerns with the new B1149 roundabout. Smaller areas of the larger site were considered but dismissed as unsuitable due to the standard of Mill Lane and Green Lane.”*

With regard to the issues raised in this commentary as being reasons to dismiss the site:

- It is stated that the scale of the proposal is stated as being a concern, yet no further comment on this is provided – why is it a concern?
- It is stated that there is a lack of a safe walking / cycling route to the catchment high school, yet this is a comment applicable to many existing commitments and proposed allocations and was not considered to be an issue in the granting of planning permission for some 429 new homes on land directly adjacent to the promotion site.
- It is stated that highway improvements would be required, that it is unlikely that a satisfactory access strategy could be devised, and that there are concerns with the new roundabout delivered as part of the adjacent development, yet evidence submitted to previous consultations (and enclosed herewith) refutes that suggestion and demonstrates that adequate highway access can be delivered without the need for any significant highway improvements.
- It is stated that smaller areas of the promotion site were considered but that these were dismissed as unsuitable due to the standard of Mill Lane and Green Lane, yet no evidence is provided to demonstrate what smaller areas were considered, why these were (incorrectly) considered to be reliant on either Green Lane and/or Mill Lane (access can be provided via the adjacent development), or why these ‘smaller areas’ were dismissed; the GNDP sought no input from BDW in respect of any smaller area despite BDW stating in previous representations a willingness to meet to discuss the site.

## **Delivery**

BDW Homes (Eastern Counties) have a very good record of delivery within Horsford. Of the two sites adjacent to the promoted site, Phase 1 (125 dwellings) was completed June 2017 and Phase 2 (304 dwellings) is currently under construction with 87 units complete at the time of writing (see further details in the table below).

It is anticipated that Phase 2 will be completed by the end of 2023. BDW can also demonstrate successful delivery of other residential sites across the Greater Norwich area, including sites in Aylsham and Poringland.

The promoted site provides a logical and suitable opportunity for residential development in an established location with Horsford benefiting from both existing and planned infrastructure. Given the presence of BDW in Horsford, there is certainty that the site can be delivered within the early years of the plan, and moreover delivered in a quick and timely fashion without the usual delays associated with starting on site.

Delivery on the promoted site could commence as early as 2024 (i.e. within the first 5-years of the plan period, extending into the second 5-years), and would deliver c. 100 new homes a year.

*Track Record*

Location	Number of homes approved	Number of homes completed	Complete date (anticipated or actual)	CIL payments made (Yes, No, N/A)
Sir Williams Lane, Aylsham	300	300	Completed November 2019	N/A
Caistor Lane, Poringland Phase 1	150	150	Completed October 2018	N/A
Stoke Road, Poringland Phase 2	120	93	120 to be completed by mid-2020	Yes, two payments totalling £658,587.40
Horsford Phase 1	125	125	Completed June 2017	N/A
Horsford Phase 2	304	87 completed by March 2019	To be completed by end of 2023	1st instalment paid: £391,528.10 2nd instalment paid: £391,528.10 3rd instalment paid: £522,037.46 4th instalment due May 2020: £1,305,093.64 Additional 45 units also subject to CIL

**Summary**

We trust that our representations above and additional information attached hereto will assist.

Please do not hesitate to contact us if we can be of any further assistance.

Yours sincerely

**Jonathan Dixon**  
**BA (Hons) MA MRTPI FRSA**  
**Director**

- Encs:
- Vision Document (Savills), March 2020
  - Highway Capacity Assessment and Public Transport Provision Review for Phase 3 Development (Richard Jackson), 6 December 2018
  - Education Report: Land at North Horsford (Phase 3) (EFM), December 2018
  - Utilities and Drainage Review (BDW), 29 November 2018
  - Ecological Report (TMA), December 2018
  - Cultural Heritage Desk-Based Assessment (RPS), March 2020
  - Landscape and Visual Appraisal (CSA), February 2020