

REPRESENTATION TO THE GREATER NORWICH LOCAL PLAN STRATEGY DOCUMENT - REGULATION 18 CONSULTATION

ON BEHALF OF

**BARRATT DAVID WILSON HOMES (EASTERN
COUNTIES)**

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

1. INTRODUCTION

- 1.1 These representations are submitted on behalf of our client, Barratt David Wilson Homes (BDW) in response to the Strategy Document for the Greater Norwich Local Plan Regulation 18 consultation.
- 1.2 As you will be aware, our client has successfully worked with Cringleford Parish Council and officers from South Norfolk Council to secure detailed planning consent for 650 homes and a site for a new primary school at their Newfound Farm site in Cringleford (ref. 2013/1793). This site is currently being built out by Barratt Developments and will deliver a successful new community within one of the Greater Norwich area's most sustainable settlements.
- 1.3 This consented site falls within site GNLP0307 – the balance of which is identified in the Sites Allocation part of the emerging GNLP as accommodating additional housing. The representations to the Strategy Document of the GNLP are made in this context.

Policy 1 - The Sustainable Growth Strategy

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

- 1.4 Our client supports the Councils' approach to focussing growth based on the hierarchy of settlements in the Greater Norwich area. This approach will result in the necessary future growth needs being accommodated principally in locations with the best access to jobs, services and existing and planned infrastructure.
- 1.5 In accordance with the sustainable growth strategy the Councils should look to maximise the use of land in existing sustainable locations, rather than promote homes in locations that need significant infrastructure to make them sustainable. Furthermore, the densification of sites that have already been identified to accommodate housing will maximise the use of existing social and transport infrastructure and minimise disruption to existing communities.
- 1.6 At the top of the Sustainable Growth Strategy hierarchy is the Norwich urban area, which includes the fringe parish of Cringleford. Within this parish 1,200 homes were allocated through the Cringleford Neighbourhood Plan and consent has been granted for 1,300. As part of the Greater Norwich Local Plan an uplift of 360 homes is proposed across two sites (GNLP0307 and GNLP0327).

- 1.7 Maximising the use of land in deliverable sites within the higher order settlements of the identified hierarchy should be the first approach that the Greater Norwich Local Plan takes to accommodating its housing numbers. Whilst our client's site (GNLP0307) is proposed to accommodate part of the proposed uplift of 360 homes for Cringleford these new homes are split between the remaining land on our client's site and the adjacent site (GNLP0327). Both these sites have a combined net developable area of approximately 13.5ha, which would result in a net density of only 26 dwellings per hectare (dph) if the uplift in the number of new homes were restricted to only 360. The figure of 26dph is well below the average density of 44dph that has been approved on the Newfound Farm site and would not accord with paragraphs 122 and 123 of the National Planning Policy Framework 2019 (NPPF) that require planning policies to ensure the efficient use of land and identify the importance of avoiding homes being built at low densities, especially in sustainable locations.
- 1.8 We have submitted evidence through the Site Allocations consultation to demonstrate that the remainder of the BDW site at GNLP0307 has the capacity to deliver approximately 500 homes and that the potential delivery at this site should be increased accordingly.
- 1.9 Our support for this question is therefore caveated by our related request to increase the number of homes that can be delivered at the preferred allocation in Cringleford.

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

- 1.10 If the Councils do not plan for enough homes for the Greater Norwich area it will worsen the existing affordability issues, limit the benefit that the area has for the local and national economy, damage social inclusion, and have negative implications for climate change as people have to travel further to access jobs. We make this comment in the context of a plan that seeks to significantly increase jobs over the plan period and yet suppresses the potential development yield from a site in one of the most sustainable locations within the plan area (i.e. GNLP0307).
- 1.11 We support the fact that headline housing numbers have been identified as a minimum figure. However, given the planned growth of the economy of the Greater Norwich area the Local Plan needs to take every opportunity to exceed the minimum figures identified for delivery by maximising the use of land on

allocated sites. We have already recommended that the delivery of homes at the GNLP0307 site should be increased and we would add that the figures should be set as a minimum in order to boost the supply of new homes in accordance with paragraphs 59 and 60 of the NPPF and support the economic growth of the plan.

- 1.12 Aligned to this, we wish to raise serious concerns that in order to meet the proposed numbers in the Greater Norwich Local Plan there is reliance on the allocation of several thousand new homes through the South Norfolk Village Clusters Housing Sites Allocation document. Presently there are no details as to how these sites will be allocated or when the document will be prepared. There is no evidence that the new homes will be accommodated in the most sustainable locations or within a timescale that will ensure that the needs identified in the plan will be met. Clearly this approach is inconsistent with paragraphs 20 and 23 of the NPPF, which require that Councils make sufficient provision for housing through strategic policies that provide a clear strategy for bringing sufficient land forward.
- 1.13 Without a strategic approach to where these additional allocations are to be located there is no certainty over whether they will deliver sustainable forms of developments. The need to draft and adopt the Housing Sites Allocation Plan will also represent a further delay to the delivery of new homes after the Greater Norwich Local Plan has been adopted. This delay, and uncertainty about the delivery of sites has the potential to limit delivery rates in the short and medium term.
- 1.14 The Greater Norwich Local Plan needs to take a more proactive approach to securing the delivery of new homes to avoid any doubt around delivery timescales and rates on yet to be allocated sites. The most expedient way to provide certainty around delivery of new homes is by ensuring that proposed allocations in the higher order settlements make the most efficient use of land by increasing densities where it is appropriate to do so. Our client's site at Cringleford would be an ideal location to increase densities in line with already consented development sites in the village.

Policy 2 - Sustainable Communities

Q. 18. Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?

- 1.15 Our client supports the Councils placing greater emphasis on climate change and believes that the most appropriate way to meet these objectives is by locating new development in sustainable locations. Cringleford, which is identified as a fringe parish of the Norwich urban area, meets the criteria for delivering a sustainable community as the village has good access to services and facilities. Moreover, sites already consented in the village are already providing green infrastructure and promoting walking and cycling for new residents, which will create a more inclusive and social community. The delivery of sites where people can walk and cycle to meet their daily needs also helps residents to establish lifestyles that benefit their physical and social health.
- 1.16 With growth already being successfully accommodated at Cringleford there are improvements to sustainable travel routes that will ensure that future and existing residents' reliance on the use of the private car will be reduced. This reduction in car dependency will also help reduce the negative impacts that unsustainable modes of travel have on climate change through increased greenhouse gas emissions. Moreover, through the promotion of walking, cycling and public transport residents will experience more positive interactions with each other and other residents of Cringleford and beyond than if they were reliant on private cars to meet their daily needs. Therefore, Cringleford is clearly a village where available sites should be developed to accommodate the maximum number of new homes whilst still respecting the semi-rural character of the village.
- 1.17 Policy 2 includes the requirement to 'ensure the effective use of land' by requiring indicative minimum densities of 25dph across the plan area and 40dph in Norwich. However, neither the Policy nor the supporting text clarify whether these figures are gross or net. Our client believes that the Policy should clarify that these are net figures. The proposed uplift in housing numbers for Cringleford would deliver approximately 360 homes across two sites with a combined net developable area of approximately 13.5ha. This would result in an average density of only 26dph across both the sites. As Cringleford is a fringe parish of the Norwich urban area it is identified as being at the top of the hierarchy for locating new growth. Therefore, this low density, only 1dph above the indicative minimum for the wider local plan area and 15dph below the indicative minimum for Norwich would not accord with the requirement of Policy 2 to 'ensure the effective use of land'.
- 1.18 In order to meet the ambitious delivery programme for the Local Plan our client supports the requirement for housing developments of 100 dwellings or more to

submit a Delivery Statement. Our client's commitment to the delivery of new homes in the Greater Norwich area means that they will be well placed to demonstrate further delivery of much needed new homes at their site in Cringleford.

- 1.19 Our client recognises the importance of delivering the infrastructure for the charging of electric vehicles but is concerned about the impact of the widespread use of residential charging points, which would require additional infrastructure to accommodate the power needed. Moreover, costs of installing the cables and associated hardware will vary considerably based on site conditions and the connections to and capacity of the local grid. It is essential that all associated costs related to electric charging infrastructure are taken into account to ensure that their cumulative impact do not render the sites undeliverable without reducing the percentage of affordable housing that they deliver. Our client believes that the best approach is for developers to ensure that the necessary ducting and cabling is installed to allow residents to fit their own electric charging points as and when required.
- 1.20 On Cringleford the use of 44dph means that the most effective use of the land will be to accommodate approximately 500 dwellings on site GNLPO307 alone. However, the proposed uplift in the allocation would result in our client's site and site GNLPO327 delivering the 360 additional homes at a density nearer to 25dph rather than the 40dph identified for sites in the Norwich urban area. This is not in accordance with the requirements of the NPPF, draft Policy 2 or the approach that has been accepted for other development sites in Cringleford.

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

- 1.21 With advances in building fabric technology our client supports the approach to increase energy efficiency for new homes rather than focussing on energy generation. Notwithstanding this, our client questions whether the 20% reduction against Part L of the 2013 Building Regulations (amended 2016) is achievable in the short to medium term. We suggest that a more flexible approach be taken to this policy requirement with the wording 'All new development will seek to provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016).'
- 1.22 The wording of Policy 2 must be amended so that matters such as viability can be taken into account when considering the merits of particular development sites.

Whilst the Council estimates that the measures to deliver a 20% reduction would cost between £2,000 and £7,000 per dwelling (which is a significant range of cost impact in itself), this additional cost could impact negatively on the delivery of sites whether other costs such as infrastructure, ground contamination, etc. were already impacting on viability. Moreover, the 'alternative approaches' text suggests that anything more than a 20% reduction would be universally unviable. Given the other site-specific requirements that will also impact upon the delivery of individual sites having a requirement for a 20% reduction that is so close to rendering sites unviable is not a sound approach to securing the delivery of new homes. Therefore, as worded the Policy requirement for a 20% reduction against Part L of the 2013 Building Regulations (amended 2016) could prevent sites coming forward, especially brownfield sites and sites with costs associated with remediation of land, which could be in highly sustainable urban locations.

Policy 4 – Strategic Infrastructure

Q. 23. Do you support, object or have any comments relating to approach to transport?

- 1.23 Our client supports the promotion of a greater shift towards non-car modes of travel in the Norwich urban area by focussing high density growth in locations with good access to sustainable transport networks. Cringleford is identified as a fringe parish that as part of the Norwich urban area is a location where higher densities should be promoted to help achieve this shift. As part of the developments already consented in Cringleford there have been significant enhancements to public transport connectivity and routes for non-motorised users. As consented sites are built out further improvements will be made to sustainable travel networks to enable new and existing Cringleford residents to access the services, facilities and job opportunities in the Greater Norwich area.
- 1.24 In addition to the improvements to sustainable travel networks the Travel Plans required for new residential developments in the village will help promote sustainable travel for residents as they move into new homes. In order to maximise the benefits of the infrastructure that has already been secured for Cringleford it is essential that the proposed uplift in numbers for the village makes the most efficient use of land in this sustainable location. Our earlier comments on the site are relevant in this context. By failing to make the most efficient use of land in this sustainable location additional homes would be more likely to be accommodated in less sustainable locations where new residents

would have limited access to sustainable modes of travel. Specifically, there are concerns that the proposed allocations through the South Norfolk Village Clusters Housing Sites Allocation document would deliver less sustainable forms of development in lower order settlements. This would lead to greater car dependency and the negative health and environmental impacts that this creates. Therefore, maximising the use of land in higher order settlements, near to places of employment in Norwich, is a sound approach to accommodating the future housing needs of the Greater Norwich area.

1.25 Investing in public transport infrastructure is only one part of the solution and for some the infrequency of services is a constraint to its use. Whilst cycling and walking also have their limitations there is clearly merit on focussing growth in location where new residents can walk and cycle to facilities and services as well as being able to cycle to higher order settlements, such as Norwich, to meet employment and wider recreational needs.

1.26 One of the most important pieces of infrastructure, which is often overlooked, is social infrastructure. That is why the Councils need to focus growth on sites on the edges of existing sustainable settlements where new residents can benefit from established social infrastructure. By allowing new residents the opportunity to walk and cycle to meet their daily needs it also creates greater opportunities for positive interactions between new and existing residents. Our client's site offers the opportunity to accommodate more homes within the popular village of Cringleford where new residents will be integrated into the existing community and benefit from existing infrastructure. Therefore, the Councils must make the most of this opportunity to maximise the use of this site by increasing the number of new homes proposed as an uplift to the allocation.

1.27 **Policy 5 – Homes**

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

1.28 Policy 5 requires 'at least' 33% affordable housing across the plan area and 'at least' 28% in Norwich City Centre. However, the evidence base for this (SHMA) suggests that a lower figure of 28% affordable housing is needed across the Greater Norwich area expressed as a proportion of a lower housing number than is now being proposed in the GNLP. There seems, therefore, to be a serious lack of evidence to justify a higher figure across the wider plan area, which raises

significant concerns about the appropriateness of the Councils' strategy of not considering alternatives to this policy requirement.

1.29 Finally, the inclusion of the words 'at least' before the percentage requirement of affordable housing should be omitted as it raises expectations that this is the minimum figure that will be delivered on sites. Where there are site specific reasons for delivery of a lower percentage of affordable housing planning officers would have less flexibility to make a planning judgement taking into account other material considerations if there is no amendment to the wording of Policy 5.

1.30 As currently evidenced, the approach set out in Policy 5 is not justified.

Q. 28. Do you support, object or have any comments relating to the approach to space standards?

1.31 We object to the approach on space standards due to the lack of evidence regarding the impact of this on the deliverability of schemes. The relevant NDSS Study (August 2019) and the Interim Viability Study (November 2019) make unsubstantiated assumptions and do not provide the level of evidence that is required by the NPPF. Further work is necessary to justify the inclusion of the NDSS as a mandatory requirement.

1.32 Furthermore, the blanket requirement of this standard does not allow for the site-specific considerations to be taken into account and therefore a further amendment to allow for such eventualities is recommended.

Q. 29. Do you support, object or have any comments relating to the approach to accessible specialist housing?

1.33 As with the proposed requirements for self-build and space standards our client has serious concerns about the impact that requirements for accessible specialist housing will have on the viability of developments. The proposals for major housing development to provide at least 20% of homes to the Building Regulation M4(2)[1] will add additional costs to housing developments, which in some instances may be unviable with a policy compliant percentage of affordable housing. Therefore, the wording of Policy 5 needs amending to allow for scenarios when it may not be possible to achieve the 20% requirement where viability issues are a material consideration.

Q. 32. Do you support, object or have any comments relating to the approach to Self/Custom-Build?

- 1.34 Whilst our client acknowledges the statutory requirement for the Councils' to promote self-build housing they believe that requiring at least 5% of plots on residential proposals of 40 dwellings or more as serviced self/custom-build plots is not the right approach. Moreover, it is questioned whether the Council's approach would accord with national policy, specifically paragraph 57-025 of PPG, which outlines that Councils should 'encourage' developers to consider self-build and custom housebuilding.
- 1.35 On larger sites the cost of delivering infrastructure can often impact negatively on the percentage of affordable housing that is delivered. A requirement for self-build plots, which generate less revenue for developers than finished homes, has the potential to further reduce the level of affordable housing on these large sites. Our client is committed to the delivery of affordable housing on their site but recognise that for any scheme to come forward it has to be commercially viable. Therefore, they are concerned about the negative impact upon viability that providing 5% of plots as serviced self/custom-build plots on sites of 40 dwellings or more will have on the delivery of affordable housing on sites across the Greater Norwich area. It seems contrary to the Councils' wider aim to deliver more affordable homes that the needs of people with the financial means to build their own homes could be prioritised over the needs of low earning residents who cannot afford to buy or rent homes in the Greater Norwich area.
- 1.36 Moreover, the need for self-build plots can be often be overstated by self-build registers. In particular, many registers are rarely updated to remove those no longer in need of a self-build plot or to assess whether there is double counting across registers. Given the attractiveness of the Greater Norwich area as a place to live and work there is also the concern that the Councils' self-build registers have been inflated by people with aspirations to live in the area, meaning that there is an artificially high number of people on the registers compared to neighbouring authorities. With this in mind, it will be important for the Councils to ensure that their evidence on the need for self-build homes has been effectively reviewed if it is to offer a robust position on the demand for this type of development. Especially given the potential number of plots that could be secured across the entire Greater Norwich area on sites of 40 dwellings or more if Policy 5 were adopted. Based on the fact that there are 113 people on the self-build register for the Greater Norwich Area it is likely that the number of plots that will be delivered on sites of 40 dwellings or more will far exceed demand.

- 1.37 Our client believes that rather than targeting major developments the Councils should prioritise self-build plots on the edges of settlements. These more rural locations are predominantly where self-builders would prefer to live rather than on residential estates. It will also mean that sites come forward as and when they are needed based on market demand, rather than in large numbers on larger development sites, which might make them more difficult to market and sell within the 12 months identified in Policy 5. Further comments on how the Councils could achieve this are provided in response to question 47. It is recommended that the Councils prioritise the delivery of self-build plots on the edges of development boundaries where the development of small sites and residential gardens for self-build homes are less likely to result in wider harm. By prioritising self-build plots through Policy 7.5 the Councils will ensure that the development of sites on the edge of development boundaries help to boost the supply of housing, addressing the Councils' self-build registers and provides a continued source of employment for small builders and tradespeople.

POLICY 7.1 – The Norwich Urban Area including the fringe parishes

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

- 1.38 Our client supports the delivery of new homes in the fringe parishes and believes that these are one of the most sustainable locations for new homes to be delivered in the Greater Norwich area. Therefore, it is crucial that the Councils maximise the use of sites in the fringe parishes that have already been identified to accommodate new homes. The use of higher densities on these sites, in accordance with the approach on sites already consented for development, will also maximise the use of new infrastructure that has already been, or is in the process of being delivered.
- 1.39 Our earlier comments in this document and the evidence submitted to the Sites Allocations element of the GNLP is of relevance here as it explains why we think more housing could be delivered at Cringleford. This should be reflected in the strategy for the fringe parishes.

Policy 7.4 Village clusters

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

- 1.40 Our client is concerned that 1,200 homes are proposed to be delivered on as yet unidentified sites that are to be allocated through a separate South Norfolk Village Clusters Housing Site Allocations document. This is a document that has yet to have an agreed timescale for production and does not feature in the current LDS. The reliance on another plan process to deliver these homes has adds uncertainty and delay to the delivery of these new homes.
- 1.41 The strategy for delivery these 1,200 new homes across the villages is yet to be identified and therefore it is unclear whether they will be delivered in sustainable locations or in the form of development that could fund sufficient infrastructure or deliver appropriate levels of affordable housing. Furthermore, if some or all of these new homes were proposed to form part of the Councils' five-year supply of housing then the uncertainties around their delivery would leave the Greater Norwich area at risk of not being able to demonstrate a five year supply of housing if they do not come forward.
- 1.42 This reliance on a further plan process departs from the single plan strategy that the GNLP seeks to deliver with inherent adverse consequences for sustainable development. This is not an appropriate strategy for the plan and therefore the alternative strategy of including this requirement as part of the single plan process is more appropriate. This would allow for this provision to be considered as part of increasing the development yield of sites that are coming forward as part of the GNLP process.

Policy 7.5 – Small Scale Windfall Housing Development

Q. 47. Do you support or object or wish to comment on the overall approach for Small Scale Windfall Housing Development? Please identify particular issues.

- 1.43 Our client supports the principle of relaxing controls on the development of land adjacent to development boundaries but believes that the figure of permitted developments should not be capped at a maximum total of 3 dwellings within each parish during the lifetime of the plan. Our client also believes that Policy 7.5 should not 'support' the delivery of self-build plots but instead it must prioritise them. An amendment of Policy 7.5 so it relates to self-build plots only, and removes the cap on numbers, should be the Councils' primary approach to the delivery of self-build plots in order to meet their statutory requirement to promote self-build housing. This approach should be used rather than seeking to secure a percentage of self-build plots on developments of 40 dwellings or more,

which are often less desirable locations for self-builders to live, as would be required by Policy 5.

- 1.44 A relaxation of development boundaries to allow the delivery of sensitive self-build plots that infill sites within a recognisable group of dwellings, and respect the form and character of settlements, is a positive tool to promote development and boost the supply of housing. The removal of a cap on the number of homes that could be delivered in each parish would ultimately allow for more self-build homes to come forward as windfall sites. If the only homes that were permitted were to accommodate the needs of people on the Councils' self-build registers this would mean that the new homes were occupied by people with ties to the area. This is also likely to mean that these new homes would be more acceptable to local communities. When considering applications for such developments planning officers would need to exercise their professional judgement as to whether individual schemes infilled sites within a recognisable group of dwellings and respected the form and character of the settlement with no detrimental impact on the landscape and natural environment. This would still allow development control officers to refuse applications for inappropriate developments in more sensitive locations.
- 1.45 Prioritising the delivery of self-build plots on the edges of development boundaries is more of a sound policy than relying on major development sites to deliver self-build plots. Especially as the cost of delivering infrastructure to serve these larger sites often impacts negatively on the percentage of affordable housing that is delivered. A requirement for self-build plots on developments of 40 dwellings or more, which generate less revenue for developers than finished homes, has the potential to further reduce the percentage of affordable housing on these large sites.
- 1.46 By permitting the development of small sites on the edges of development boundaries to accommodate self-build plots it would help to boost the supply of housing, address the Councils' self-build registers and provide a continued source of employment for small builders and tradespeople. It would also remove the obligation from larger development sites in order to maximise the amount of affordable housing that they could viably deliver.