

**Sites Document of the GNLP
(Regulation 18(C) – January 2020)**
Orbit Homes and Bowbridge Strategic Land
representations, prepared by David Lock Associates

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1.0 INTRODUCTION

- 1.1 This representation relates to the draft GNLP Sites document. More specifically, this representation provides comment on the proposed approach to Village Clusters in South Norfolk and the site assessment approach employed by the Greater Norwich Development Partnership (GDNP).
- 1.2 These representations are submitted alongside and supplement comments on the GNLP Strategy Document and Sustainability Appraisal. The covering letter prepared by David Lock Associates accompanying these representations provides the background to our position and sets out the full suite of supporting information that is provided as part of our representations.
- 1.3 Please note that this representation also includes comments regarding the Site Assessment booklets which although are separate documents, have informed the choices made within the draft GNLP Sites document.

2.0 THE VILLAGE CLUSTERS APPROACH

- 2.1 We wish to express concerns generally regarding the approach to the allocation of sites for development across numerous Development Plan Documents (DPD). Our comments set out in the covering letter (under the heading *Procedural Concerns*) provide further details.
- 2.2 Specifically, we object to the approach taken within the draft GNLP Sites document in respect of South Norfolk Council's intention to unilaterally prepare a separate Village Clusters Plan covering new and carried forward sites for housing in their village clusters, whilst the sites to be allocated for housing in the village clusters in Broadland District are included within the draft GNLP Sites document. We make three points of objection in principle:
 - i. Firstly, the GNLP is a joint plan. Decisions on site allocations should be made in the context of meeting whole plan objectives, evidence and SA relating to the plan area as a whole. Unlike the Broadland site allocations for village clusters, the decision-making process regarding the South Norfolk Village Cluster site allocations - which presumably is to be undertaken unilaterally by South Norfolk Council separately from joint planmaking - is neither logical nor transparent. This approach undermines and acts counter to the GNLP whole plan objectives and SA conclusions, which in turn risks the soundness of the Village Clusters document and the GNLP Plan as a whole. This is clearly not a desired outcome for any of the three authorities;
 - ii. Secondly, the Village Clusters document proposes to allocate sites for c.1,200 dwellings in total. The scale of housing land required to meet this requirement - and the options for how this requirement might best be met in a way which meets wider plan objectives - is such that if tests of soundness are to be met, can only be considered as an inherent part of the GNLP;
 - iii. Thirdly, the timing of a separate South Norfolk Village Clusters document has led to a blanket approach of postponing the assessment of sites within/around village clusters that have been promoted through the GNLP call for sites process until the preparation of this document takes place. Again, this risks undermining the overall soundness of the evidence base, SA and content of both plans as the assessment of cumulative impact or reasonable alternatives cannot be done in a holistic or robust manner;
- 2.3 Furthermore, some of the sites promoted through the call for sites process within/around village clusters are strategic in nature and scale. For example, site GNLP2101 (promoted for a

residential-led mixed use development) at Spooner Row includes a site area of 77.26ha. Whilst this site has been assessed as part of the Housing and Economic Land Availability Assessment (HELAA) Addendum October 2018, it has not been subject to the same detailed site assessment process as sites considered for allocation within the draft GNLP Sites document. Rather, it is proposed that such sites will be subject to future consultation by South Norfolk Council, with no indicative timescales provided for when, how or against what objectives this further consultation will take place or how it will link with the progression and examination of the GNLP. However, a number of sites including GNLP2101¹ are considered strategic in scale, and as such go well beyond what should be reasonably considered as part of a separate or 'lower order' site allocation document.

- 2.4 None of the sites listed in the footnote below have been considered for allocation within the draft GNLP Sites document. As such, none of the sites have been subject to the same detailed site assessment as the sites considered for allocation within the GNLP despite being of a similar scale and nature. Rather, these sites will be subject to further, separate, consultation by South Norfolk Council.
- 2.5 In addition to the procedural disparity this creates – and one which will add to the complexity around site assessment and a confusion amongst public or wider stakeholders wishing to engage with the plan making process – the failure to consider such strategic scale sites compromises the growth strategy in a number of ways:
- it cannot fully consider all of the proposed strategic infrastructure that may be required for the Plan period within the GNLP;
 - it assumes that the village clusters will remain at the same position within the GNLP settlement hierarchy; and
 - it prevents the GNLP growth strategy being tested against all available reasonable alternatives.
- 2.6 On the basis set out above, we object to the approach proposed within the draft GNLP Sites document to allocate 1,200 dwellings within a separate DPD document on the grounds that it has led to a flawed site assessment process which compromises the proposed growth strategy and the soundness of the GNLP as a whole.
- 2.7 We suggest that to remedy the situation and to ensure that the GNLP can move effectively through Regulation 19 and Examination, those sites to be allocated for development at the village clusters in South Norfolk should be considered and allocated as part of the GNLP Sites document. There is an opportunity to undertake the necessary assessment (in tandem with the additional SA work we suggested is also needed to test reasonable spatial strategy alternatives to Policy 1²) in the period between the end of consultation (Regulation 18c) and the next round of consultation (Regulation 19) scheduled for January/February 2021.
- 2.8 If GNLP continue to pursue a separate South Norfolk Village Clusters document as a separately-assessed and unilaterally-determined DPD, then we have serious reservations over the soundness of the Plan as a whole and its likely success at Examination.

¹ GNLP0476R – promoted with a site area of 23.67ha;
GNLP0552 - promoted with a site area of 37.39ha;
GNLP0340 - promoted with a site area of 43.17ha; and
GNLP0315 – promoted with a site area of 130.29ha.

² See our representations to the GNLP Strategy Document for further details.

3.0 THE SITE ASSESSMENT APPROACH

- 3.1 We support the inclusion of GNLP2168 (Silfield Garden Village) as a 'reasonable alternative' within the Sites Assessment and are of the view that if allocated could deliver sustainable growth and help to meet the objectives and ambitions of the GDNP.
- 3.2 We consider that SGV as a reasonable alternative site would be of great value to the GDNP in meeting the housing needs of the GNLP and this is covered in more detail in our representation on the Strategy Document.
- 3.3 However, we strongly object to the approach to the site assessment taken within the draft GNLP Sites document. Our comments below should be read in conjunction with the comments made on the approach to village clusters set out above which are interlinked to how the site assessment approach has been undertaken and preferred sites decided.
- 3.4 The decisions made within the draft GNLP Sites document are informed by the individual site assessment booklets which in turn have been informed by the various iterations of the HELAA.
- 3.5 It is noted that no site assessment booklets have been produced for the South Norfolk Village Clusters given the proposed approach to produce a separate document to allocate these sites (see *comments on this approach in Section 2*).
- 3.6 The individual site assessment booklets set out a 7-stage approach to the site assessment process. The process is outlined as follows:
- Stage 1 – List of sites promoted in the settlement;
 - Stage 2 – HELAA tables;
 - Stage 3 - Summary of consultation comments;
 - Stage 4 - Discussion of submitted sites;
 - Stage 5 – Shortlist of reasonable alternative sites for further assessment;
 - Stage 6 – Detailed site assessments of reasonable alternative sites; and
 - Stage 7 – Settlement based appraisal of reasonable alternative sites and identification of preferred sites.
- 3.7 On this basis, it is not clear how the SA has featured in the site assessment process. We suggest that this is made more explicit for the next round of consultation, and would welcome any clarity on this point in the meantime.
- 3.8 In addition, some of the site assessment stages which have taken place are vague in detail and process. For example, the Stage 3 commentary recorded includes both attributed and non-attributed commentary (so it is unclear whether comments are from promoters, the Council, other stakeholders of objectors), and whilst it includes some stakeholder comments (eg. Wildlife Trust) it does not include others.
- 3.9 Equally, Stage 4 (Discussion of Submitted Sites) does not include any written evidence (such as written minutes of discussions; a record of what criteria shaped these discussions; or a list of main outcomes), so it is not clear to a member of the public or a developer why a particular site has been excluded from the next stage of assessment.
- 3.10 We suggest that without further clarity on this matter, the assessment process is flawed. Again, this matter should be addressed as part of the next round of consultation.

Site Assessment for Silfield Garden Village

3.11 The site assessment process for the assessment of site GNLP2168, promoted as the Silfield Garden Village, set out in the *Wymondham Site Assessment Booklet* is as follows:

- Stage 1 - Included within the complete list of sites promoted within Wymondham.
- Stage 2 – HELAA Comparison table:

Site Reference: GNLP2168	
Site Access	Amber
Access to services	Red
Utilities capacity	Amber
Utilities infrastructure	Green
Contamination/ ground stability	Green
Flood risk	Amber
Market attractiveness	Amber
Significant landscape	Green
Sensitive townscape	Amber
Biodiversity & Geodiversity	Amber
Historic environment	Green
Open space and GI	Green
Transport & Roads	Amber
Compatibility with neighbouring uses	Green

- Stage 3 - Summary of consultation comments:

"General comments

One comment on site; site GNLP2168 is far more compliant with the options consulted on by the GNLP than other proposed new garden settlements which do not benefit from comparable transport connections, or the strategically important location on the Norwich -Cambridge hi-tech corridor. And the essential need to give appropriate confidence of delivery is fully understood. Measures have been taken to ensure a reliable and effective delivery mechanism is in place. See Full Report.

Objections raised concerns regarding road safety particularly for pedestrians, no footpaths, unsuitable roads, pollution, loss of greenbelt environment, scale of development, lack of infrastructure, loss of prime agricultural land, impacts on wildlife and loss of the natural environment, loss of local heritage and flooding issues.

An archaeological site: Park Farm is an ancient deer park; Lower Park Farm is moated and was an ancient hunting lodge. Therefore, an historical site. Loss of good arable land, wildlife habitats, veteran trees.

Norfolk Wildlife Trust comments

We object to the inclusion of this site in the plan, due to the loss to irreplaceable ancient woodland which would occur. We strongly recommend that this site is removed from any further consideration in the plan."

- Stage 4 - Discussion of submitted sites:

"New settlement proposals:

The new settlement proposals of GNLP1055 (covered in the Mulbarton booklet) and GNLP2168 are also, less preferred for further assessment at this time because a significant proportion of the existing commitment is already on large sites. The Towards a Strategy document discusses how Honingham is the preferred contingency site for a large-scale new settlement. As a place for a new Settlement Silfield is less preferred and individually the sites are remote from Wymondham and physically separated by the A11."

- Stage 5 - Silfield site and proposal (GNLP2168) not included within the shortlist at Stage 5.
- Stage 6 - Silfield site and proposal (GNLP2168) not included within Stage 5 so by virtue not included within Stage 6.
- Stage 7 - Settlement based appraisal of reasonable alternative sites and identification of preferred site(s) (Where appropriate):

"Sites GNLP1055 and GNLP2168 are identified as reasonable alternatives for a new settlement. These sites are promoted as new garden villages but are not preferred for allocation as it is not proposed to include a new settlement in the GNLP at the current time."

Reasonable Alternative Sites:

Address	Site Reference	Area (ha)	Proposal	Reason for not allocating
Wymondham				
Park Farm	GNLP2168	340	6500 dwellings, new settlement	This site is promoted as Silfield Garden Village (with sites GNLP0403 and GNLP0515). This combination of sites is considered to be a reasonable alternative for consideration as a new settlement through a future review of the plan. The site is not preferred for allocation as it is not proposed to include a new settlement in the Greater Norwich Local Plan at the current time.

Our Commentary on the Site Assessment Process – New Settlement Sites

- 3.12 From the above, it is not clear why GNLP2168 (Silfield Garden Village) was not assessed under Stages 5 and 6 of the assessment process. The only indication of why GNLP2168 (Silfield Garden Village) is not included at Stages 5 and 6 of the assessment is paragraph on page 13 of the Wymondham Site Assessment booklet which reads:

"The new settlement proposals of GNLP1055 (covered in the Mulbarton booklet) and GNLP2168 are also less preferred for further assessment at this time because a significant proportion of the existing commitment is already on large sites." (our emphasis)

- 3.13 The fact that a "significant proportion of the existing commitment is already on large sites" is not in itself a sound reason to exclude further assessment of the site in the same way as other sites

considered 'reasonable alternatives'. Neither does a site being "less preferred" constitute a sound reason to not undertaken further assessment of reasonable alternatives.

- 3.14 We note that a different approach has been taken to GNLP0415, where "*this is a proposed new settlement and is considered to be a reasonable alternative due to its identification as an alternative/contingency site in the 'Towards a Strategy' document*". (our emphasis)
- 3.15 However, the *Towards a Strategy* document (January 2019) was prepared as "a high-level planning strategy to guide the preparation of the Regulation 18 draft of the Greater Norwich Local Plan". It was not consulted on as a formal stage of the emerging development plan and has not been subject to SA. The reasoning behind the inclusion of the Honingham Thorpe New settlement sites (a "New Settlement Proposal (rising to 7,500)") as one of the 'Large-scale sites for testing as possible alternatives or contingency sites' (page 7) was that it was "*proposed by an RSL, and with more evidence, giving more certainty about delivery than alternative new settlements*", not that other potential new settlement locations were any less appropriate or should be discounted.
- 3.16 This reasoning was given at a point in time, and we consider the position in respect of evidence to support the other new settlement proposals has since changed³, as has the requirement to consider a new settlement as part of the current plan rather than as a contingency site or allocation in a review of the plan.
- 3.17 On that basis, we consider that the 'preferred status' of Honingham Thorpe in the *Towards a Strategy* document should be given limited weight and all three identified new settlement options should have been assessed as part of the SA and Site Assessment process. Without rectifying this omission, the GNLP cannot demonstrate that all of the reasonable alternatives have been properly assessed and considered through the SA. This undermines the legitimacy of both the proposed growth strategy and proposed allocations.
- 3.18 We note that GNLP1055 (West of Hethel), also promoted as a new settlement proposal, reaches the same assessment stage as GNLP2168 (Silfield) and is also considered a 'reasonable alternative'. However, no site assessment booklet for Mulbarton to provide further comment on the new settlement proposal under GNLP1055 is available on the consultation website. The Wymondham site assessment booklet makes reference to this on page 13 (*extract included above*). We would welcome clarification from the GNLP on this point.
- 3.19 Site GNLP0415 (Honingham Thorpe) also promoted as a new settlement. However, in contrast to Silfield and Hethel new settlement proposals, the Honingham Thorpe new settlement is carried forward for assessment as part of Stages 5 and 6 of the site assessment process. The reasoning for this appears to be justified by the statement that "*the new settlement proposals of GNLP1055 (covered in the Mulbarton booklet) and GNLP2168 are also less preferred for further assessment at this time because a significant proportion of the existing commitment is already on large sites*" – not because new settlement options at Silfield and Hethel are any less favoured in terms of their location or suitability against site assessment criteria. This is an inconsistent approach for which justification is not given, nor adequate explanation provided.
- 3.20 Furthermore, Honingham Thorpe has been assessed under a series of individual parcels (Parcels A – G) rather than as a comprehensive new settlement proposal. This means that some of the parcels receive relatively high scores given that they propose no or little built development (for examples GNLP0415-E is promoted as a Country Park). However, on the grounds that Parcels A-E would not come forward in isolation for the uses proposed (given the new settlement proposal under consideration), it is clear that the majority of these parcels would not have scored as highly

³ For example, a Development Prospectus for Silfield Garden Village setting out the details of the proposal was submitted to the GNLP in September 2019.

against the Council's criterion had the proposal been considered as a single comprehensive proposal.

- 3.21 It is also not clear how the GNLP authorities have assessed the impacts of the parcels of site GNLP0415 (Honingham Thorpe) which propose built development, given that no specified number of dwellings or floorspace for commercial development is provided.
- 3.22 This approach – the methodology for which is also carried through into the SA of the GNLP – results in a worrying discrepancy in the way in which strategic sites have been comparatively assessed; a concern we also raise with regard to other aspects of the GNLP site assessment process (see comments made at paragraphs 2.1 – 2.13).
- 3.23 The different approaches to the assessment of the three new settlements is not reflected in their status in the Sites Document as 'reasonable alternatives' and as such there are major flaws in the assessment methodology and evidence base that underpins the Sites Document.
- 3.24 On the basis of the commentary above, we strongly suggest that the assessment process for the three new settlement sites is revisited. Given the time that has passed since the publication of the Towards a Strategy document and the level of technical information now available, each new settlement option should be taken through the same levels of site assessment (ie all to Stage 7) on a like for like basis as a single comprehensive development area based on an overall site boundary.
- 3.25 This methodology will ensure that these new settlement sites are not only consistent with one another but that the assessments are aligned with the way in which all other 'reasonable alternative' sites have been assessed. In order to ensure that any revisited assessment is robust and based on factual accuracy rather than assumptions about what is proposed, we would welcome opportunities to discuss the SGV proposal further with those responsible for undertaking the assessment.
- 3.26 In the absence of this re-assessment of the new settlement proposals consistently with one another as well as the other 'reasonable alternatives', we have serious reservations as to the soundness of the GNLP Sites Document and its likely success at Examination.