

# **REPRESENTATIONS TO THE GREATER NORWICH LOCAL PLAN STRATEGY DOCUMENT - REGULATION 19 CONSULTATION**

**ON BEHALF OF**

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

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## 1. INTRODUCTION

- 1.1 These representations are submitted on behalf of our client, Barratt David Wilson Homes (BDW) in response to the Greater Norwich Local Plan Regulation 19 consultation.
- 1.2 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 The Newfound Farm site falls within the allocation reference: GNLP0307. The land that is not the subject of the detailed consent is identified in Policy GNLP0307/GNLP0327 as accommodating part of the uplift of 410 homes for Cringleford. These representations are made in the context of the uplift area continuing the established design approach and densities of the consented development.
- 1.4 In accordance with requirements set out in the National Planning Policy Framework 2019 (NPPF) the Regulation 19 draft of the Local Plan has been considered against the following criteria:

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

**Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

**Effective** – deliverable over the plan period and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

**Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

- 1.5 Whilst our client supports the draft Local Plan they recommend that further changes be made to Policy GNLP0307/GNLP0327 to ensure that it is consistent with national policy and will enable the delivery of sustainable development.

### **Policy 1 - The Sustainable Growth Strategy – Comment**

- 1.6 Policy 1 introduces flexibility to accommodate additional growth if the housing needs of the Local Plan area change. It is therefore essential that this flexibility extends to other policies of the Local Plan, specifically those that allocate sites for development. This will ensure that any changes to the growth predictions in the Local Plan can be accommodated by increasing development yields at sites that have already been identified as sustainable without the need to rely on sites in potentially less sustainable locations. It will also mean that the plan is positively prepared and accords with the requirement of the NPPF to boost the supply of new homes by making the most efficient use of land in the most sustainable locations.

### **Policy 2 (Sustainable Communities) - Not justified; not consistent with national policy**

- 1.7 Policy 2 requires development to “make provision for delivery of new and changing technologies”. These include electric vehicle charging technologies. However, Policy 2 does not state the level of provision of charging points that will be required or identify the scale of development where this policy would be applicable. Instead, supplementary guidance is proposed to set out the details of future requirements.
- 1.8 A supplementary document cannot go beyond the requirements of planning policy. Therefore, as Policy 2 does not set a specific requirement for electric vehicle charging infrastructure it is not appropriate for a supplementary planning document to do so. Whilst other technologies are easier to install on sites the provision of electric vehicle charging infrastructure and the associated energy needs can have a direct impact upon the viability of development. Accordingly, any specific requirement for charging points that is proposed needs to have been assessed through the Viability Appraisal that accompanies the Local Plan. In this case, as Policy 2 does not require a specific percentage or number of charging points no such assessment has been carried out. Therefore, the impact on the viability of any future requirement has not been adequately assessed.

- 1.9 This issue is particularly relevant to our client's site at Cringleford. The need to increase the capacity of the energy supply network through a reinforcement of the primary substation at Cringleford is a factor that could constrain the delivery of new homes.
- 1.10 It is essential that all associated costs related to electric charging infrastructure are taken into account to ensure that their cumulative impacts do not render sites undeliverable. This point was raised in responses to the Interim Viability Appraisal and this matter has not been adequately addressed in the final Viability Appraisal. 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. Without any assessment of the impact of requiring electric vehicle charging points on viability, and therefore the deliverability of sites, Policy 2 is not justified and should be amended. In addition, all reference to a future standard being provided by a supplementary planning document should also be deleted.
- 1.11 Following criterion 9 of Policy 2 it states "If the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich". It is not clear whether this statement relates to criterion 9, criterion 10 or all the criteria of Policy 2. Therefore, this text does not accord with paragraph 16 of the NPPF, which requires policies to be clearly written and unambiguous. Notwithstanding this, the statement is not justified and, as there is, any such standards that may subsequently be introduced have not been assessed through the Viability Appraisal. Therefore, their potential impact upon the viability and deliverability of sites is unknown.
- 1.12 It is not reasonable for Policy 2 to allow the decision maker to choose which standards can be applied if higher standards have not been adequately assessed through the Local Plan process. New standards should be introduced through a partial review of the Local Plan so that the implications can be properly tested and understood. New standards should not be introduced through supplementary planning documents or implementation notes as the supporting text of Policy 2 indicates. These documents cannot legally introduce standards over and above policies of the Local Plan.
- 1.13 At the time of the Regulation 18 consultation the emerging Local Plan sought a 20% reduction against Part L of the 2013 Building Regulations (amended 2016).

The interim viability appraisal that was consulted upon at that stage identified that a higher percentage would not be viable. Policy 2 now proposes a reduction to 19% “except where a lower provision is justified because the requirement would make the development unviable.” Given the fact that the Council's own evidence indicates that 20% is unviable, it is reasonable to assume that the minor reduction to 19% will be unlikely to tip the balance in favour of viability. As the Viability Appraisal dated December 2020 does not clarify why the reduction from 20% to 19% is necessary it is difficult to understand how schemes will be more viable at this level.

- 1.14 The evidence base is similarly silent on the impact of the self-build requirement in this policy. The combination of these untested elements of the policy raises concerns about the implications of these requirements on deliverability.
- 1.15 Criterion ii encourages masterplanning using a recognised community engagement process on larger sites and particularly for proposed developments of 200 dwellings. There is no description of what this masterplanning process may constitute and therefore the use of such a process has the potential to delay delivery. There is no evidence that such delays have been acknowledged in the trajectory for homes that will be delivered on larger sites.

### **Recommendation**

- 1.16 It is recommended that criterion 2 of Policy 2 be amended to remove reference to a requirement for the provision of electric vehicle charging infrastructure until an assessment of the impact on the viability of developments of any such requirement has been carried out.
- 1.17 Policy 2 should also be amended to delete the wording: “If the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich”.
- 1.18 Further evidence is required to demonstrate that the 19% reduction against Part L of the 2013 Building Regulations (amended 2016) is justified. This evidence is needed to demonstrate that it will not result in sites being undeliverable when taking into account those requirements of Policies 2 and 5 that will further impact upon viability and have not been adequately assessed in the Viability Appraisal.
- 1.19 Further clarification should be provided as to the masterplanning process that developers are expected to undertake for larger sites. In addition to this, an

assessment should be carried out as to whether this process would delay the delivery of sites above the 200 dwellings threshold.

## **Policy 5 (Homes) - Not justified or consistent with national policy**

### **Affordable housing**

- 1.20 The wording of Policy 5 identifies that in some circumstances the percentage of affordable housing that a site can deliver is dependent on financial viability. However, it only allows this important material consideration to be applied to brownfield sites.
- 1.21 Whilst it is less common for greenfield sites to have abnormal development costs there can be costs associated with infrastructure delivery and made-up land that impact upon the viability of schemes. This is especially the case for sites that are built out to lower densities where there is less flexibility to offset higher development costs against the number of new homes that are delivered. The requirements for self-build plots, space standards and part M(2) dwellings also have the potential to further reduce the level of affordable housing sites can viably deliver. As the requirement for self-build plots in particular has not been included in the Viability Appraisal there is no evidence that it will not render sites unviable to develop if there is no flexibility to the percentage of affordable housing.
- 1.22 Policy 5 needs to allow the applicant for any site to demonstrate that site specific matters can justify the need for a viability assessment to determine the level of affordable housing that should be delivered. This should not just be limited to brownfield sites. Without this flexibility Policy 5 has the potential to prevent sites coming forward, contrary to the requirements of paragraph 59 of the NPPF to boost housing supply. It is therefore not consistent with national policy.
- 1.23 The 2017 SHMA provides the evidence base for the percentage of affordable housing across the Greater Norwich area, which at that time was calculated as 28% across the Local Plan area. However, once the numbers that have already been delivered (detailed in the Greater Norwich Authority Monitoring Report) and those that could potentially be delivered by Policy 5 have been taken into account, there are questions about whether supply would exceed demand. Notwithstanding the fact that the Norwich area will only be required to deliver 28%, with the ability for this to be reduced due to viability issues, the minimum requirement of 'at least' 33% across the rest of the Local Plan area has the

potential to far exceed demand based on the number of major developments that are allocated.

- 1.24 It is essential that the affordable housing requirements of Policy 5 required are appropriately evidenced to ensure that they are proportionate to future need. A policy that seeks to deliver more than is required must also be fully tested in terms of its impact on the viability of allocated sites. A requirement to deliver more than is required will inevitably impact on the viability of development sites to deliver other benefits and policy requirements that have not been assessed in the Viability Appraisal.
- 1.25 If as a result of this further work it is demonstrated that Policy 5 would overdeliver on affordable housing then this raises further concerns about the appropriateness of the Councils' strategy of not allowing a more flexible approach to the requirements of Policy 5 for non-brownfield sites. Without being able to take into account other material planning considerations when assessing the level of affordable housing that individual sites can deliver Policy 5 could prejudice the deliverability of individual sites, thereby undermining the effectiveness of the Plan. If following a further review of the evidence it is confirmed that Policy 5 will overdeliver affordable housing, then the requirements of Policy 5 for the provision of affordable housing on sites outside the Norwich area should be reduced accordingly.

### **Recommendation**

- 1.26 The percentage of affordable housing required by Policy 5 should be reviewed in light of past provision since the SHMA was produced and the numbers that could potentially be delivered by sites of more than ten units in the Local Plan area. If as a result of this further work the identified need for affordable housing is shown to be exceeded by the requirements of Policy 5 then the percentage of affordable housing for sites outside the Norwich City Centre area should be reduced accordingly.
- 1.27 Notwithstanding the above, the wording of Policy 5 should also be amended so that viability considerations can be taken into account for all sites and not just brownfield sites.

### Space standards

- 1.28 Policy 5 requires the provision of minimum space standards for all housing development proposals. This approach does not offer any flexibility for decision makers to consider applications for development that does not accord with the space standards but where other material planning considerations carry weight. For example, it may not be possible for the conversion of existing buildings to fully comply with the space standards, especially listed buildings where to accord with the policy the loss of historic fabric and layout may be needed.
- 1.29 Moreover, the introduction of space standards can have a negative impact upon the density and efficient use of smaller sites with a high percentage of smaller properties. The supporting text of Policy 5 encourages development proposals to consider the need for wheelchair adapted homes which meet the Building Regulation M4 (3) standard or any successor. However, this is not set as a policy requirement and is only encouraged “where viable”. Therefore, the Councils acknowledge that such standards can impact upon viability. Accordingly, Policy 5 needs to include the flexibility for developments that cannot comply with the space standards to be approved where other material planning considerations, such as viability and heritage constraints carry weight in the planning balance. The aspiration for new developments to meet space standards is a valid one. However, the blanket requirement of space standards does not allow for site-specific considerations to be taken into account and Policy 5 is not justified.

### Recommendation

- 1.30 The wording of Policy 5 should be amended to allow greater flexibility for other material planning considerations to be taken into account. Please see suggested wording for Policy 5 below:

***‘Unless other material planning considerations indicate otherwise, all housing development proposals must meet the Government’s Nationally Described Space Standard for internal space or any successor.’***

### Self-build

- 1.31 Policy 5 requires at least 5% of plots on residential proposals of 40 dwellings or more to provide serviced self/custom-build plots unless “a lack of need for such plots can be demonstrated; plots have been marketed for 12 months and have not been sold.” This requirement on larger sites will reduce the development yield



of the proposed allocations thereby creating a situation where they do not deliver the number of units identified. This could then contribute to the failure of the plan to meet the identified housing requirement, which would conflict with national policy.

- 1.32 Policy 5 is not clear as to whether an applicant can only demonstrate a lack of need once plots have been marketed or whether an argument can be considered at the application stage based on a lack of need being demonstrated at that time. Moreover, the use of the Councils' self-build registers, which only had 113 people on them in 2018/19, is not robust enough for the requirement of Policy 5 to be justified.
- 1.33 Given the number of allocations in the Local Plan it is evident that more than 113 plots would be delivered by Policy 5 alone. If it is the case that supply exceeds demand, then those bringing forward sites early on in the plan period will have to meet the requirement whereas those coming forward later on in the plan period would be able to demonstrate that the demand has been met. This may then discourage developers from coming forward early on in the plan period. As Policy 7.5 also encourages self-build developments on the edges of development boundaries this is another source of self-build plots that needs to be factored into any supply calculations to ensure that supply will not greatly exceed demand.
- 1.34 The Councils must demonstrate how many self-build plots Policies 5 and 7.5 are likely to deliver and whether the requirement of Policy 5 in particular is proportionate to the evidence. As part of this evidence base it is also necessary for the Councils to identify how many self-build homes have been granted permission since the requirement to maintain self-build registers was introduced. Alongside this the Councils should also survey people on their self-build registers to identify whether they would be likely to take a plot on a large-scale development.
- 1.35 The above point is particularly relevant as people can often put their names on the self-build registers of different Councils and only take a plot in their preferred location, which may not be part of a large-scale development. The Councils will need to consider the robustness of their self-build register as an evidence base and an accurate indicator for demand for self-build plots. This matter was raised in the examination of the Bedford Borough Council Local Plan 2030. In the Report on the Examination of the Local Plan 2030 of 20<sup>th</sup> December 2019 (extract below)

the Council confirmed that the draft policy requirement for a percentage of self-build plots on developments of 100 dwellings or more was not justified.

*"The Council has confirmed that Bedford Borough's register of people interested in custom and self-build has been in place since April 2016 and shows 193 individuals and one association of two individuals registered. However, the register has not been reviewed since that date to ascertain whether all those on the list are still seeking a plot. It has therefore not been possible to determine whether the Council's policy of 10% of all development on plots of 100 or more is reasonable or that it responds proportionately to need. Consequently, we cannot conclude that the policy is justified by the available evidence."*

- 1.36 The Councils also need to assess whether they can meet the existing and future need through their own housing strategies, land disposal and regeneration functions in accordance with paragraph 57-014 of the PPG.
- 1.37 All the aforementioned steps need to be gone through before the Councils seek to place additional burdens on house builders. Especially as paragraph 57-025 of the PPG confirms that Councils should only 'encourage' developers to consider self-build and custom housebuilding.
- 1.38 In many cases self-built plots can result in inefficiencies in the development of sites with the need for separate construction accesses and site compounds that may need to be in place long after the host development has been built out. They also generate less revenue for developers than finished homes. If plots are subsequently not sold then it is often not economically viable for volume housebuilders to return to a site to build out individual plots. Therefore, a requirement for self-build plots can impact negatively on the financial viability of a development. Accordingly, this matter should have been considered in the Viability Appraisal to demonstrate that requiring 5% of large sites to be self-build plots is justified and will not delay the delivery of new homes in the most sustainable locations.
- 1.39 If the only mechanism to demonstrate a lack of need for self-build plots is by marketing them for 12 months then this would delay the delivery of new homes more than if the same land were built out as part of a wider development. Our client has always been of the opinion that the limited numbers of self-builders on the Councils' registers would be best accommodated as windfall sites on the edges of development boundaries as permitted by Policy 7.5. This would both accelerate the holistic delivery of larger sites and deliver plots in locations where

self-builders are more likely to want to live. This approach will also deliver plots at a volume and pace that will address the existing and future needs.

### **Recommendation**

- 1.40 The Councils should delete the requirement for 5% of homes on sites of 40 or more dwellings to be allocated to self-build or custom housebuilding. Alongside this, Policy 7.5 should be amended to allow self-built plots to be provided as exceptions to the thresholds for development outside development boundaries.

### **Policy 7.1 (The Norwich Urban Area including the fringe parishes) - Not consistent with national policy**

- 1.41 Policy 7.1 lists the proposed allocations for the Norwich Urban Area including the fringe parishes. This Policy has a figure of 1,771 homes for Cringleford, which is identified as being the "Total deliverable housing commitment 2018 – 2038". This figure is made up of the uplift in the allocation to 1,710 homes and an additional 61 homes that are already consented elsewhere in the village. Whilst Policy GNLP0307/GNLP0327 includes the word 'approximate' before the figure of 1,710 for the Cringleford allocation Policy 7.1 does not. Instead, it identifies the 1,771 figure as being a total. Without there being any clarification that the figures for allocations can be deviated from there is the danger that they may be seen as maximum figures. Especially as Policy 7.1 uses the term 'total', which is not consistent with the Cringleford allocation Policy that permits a more flexible approach to numbers with the use of 'approximately'. Accordingly, the wording of Policy 7.1 would not be consistent with the requirement of paragraph 59 of the NPPF to boost the supply of new homes.
- 1.42 The use of 'approximate' allows for a deviation from the figure of 1,710 homes for Cringleford and therefore there must be a consistent approach to the figures in the Local Plan where they are not absolute figures. In Policy 1 all the figures are identified as minimum figures. Therefore, the same should apply to the figures for draft allocations. This will allow the final number of new homes to be delivered at each site to be based on a design-led approach that makes efficient use of land by delivering densities that are influenced by "on site characteristics", as required by Policy 2.

## Recommendation

- 1.43 Policy 7.1 should be amended so that all the figures for the allocations are identified as minimums. Additional text should be added to confirm that developments will be required to make effective use of land with the final number of homes delivered on individual allocations being based on a design-led approach.

### **Policy 7.5 (Small Scale Windfall Housing Development) - Not effective**

- 1.44 Paragraph 16 of the NPPF requires policies to be clearly written and unambiguous. The use of the term "Positive consideration will be given to self and custom build" does not provide sufficient clarity for the decision maker as to the weight that can be attached to proposals for self-built plots. For example, if the threshold for a parish were to be exceeded by two separate applications that were undetermined would one be approved over the other if it were to be self-build? Whilst it is positive that Policy 7.5 is seen as a mechanism for promoting self-built plots it will be ineffective once the thresholds for individual parishes have been reached.
- 1.45 It is recommended that self-build plots be specifically referenced in a criterion of Policy 7.5. Given the low numbers presently on the Councils' registers the amendment of Policy 7.5 to positively promote self-build plots will be a more effective way of delivering them than requiring 5% on larger sites. This will speed up the delivery of the larger sites and provide a supply of self-build plots in locations where self-builders want to live.
- 1.46 Policy 7.5 should be the Councils' primary tool for securing the delivery of self-build plots in order to meet their statutory requirement to promote self-build housing. However, the proposed cap in numbers for each parish would make it less effective in achieving this aim. The amendment of Policy 7.5 to positively provide for self-build plots would also remove the need for 5% of developments of 40 dwellings or more to provide 5% self-build plots as required by Policy 5.
- 1.47 Prioritising the delivery of self-build plots on the edges of development boundaries is more of a sound policy than relying on large development sites to deliver them. Especially as the approach proposed in Policy 5 has the potential to increase costs and reduce profits for developers, which could delay the delivery of new homes. Moreover, the removal of the obligation from larger developments

would maximise the amount of affordable housing that they could deliver in cases where site specific issues may be affecting viability.

### **Recommendation**

- 1.48 Policy 7.5 should be amended to positively provide plots for self-build over and above the thresholds or small and larger parishes. Please see suggested wording for Policy 7.5 below:

***"Other than proposals for self-build, cumulative development permitted under this policy will be no more than 3 dwellings in small parishes or 5 dwellings in larger parishes (as defined in appendix 7) during the lifetime of the plan"***

### **Part 2 - The Sites 3. Urban Fringe**

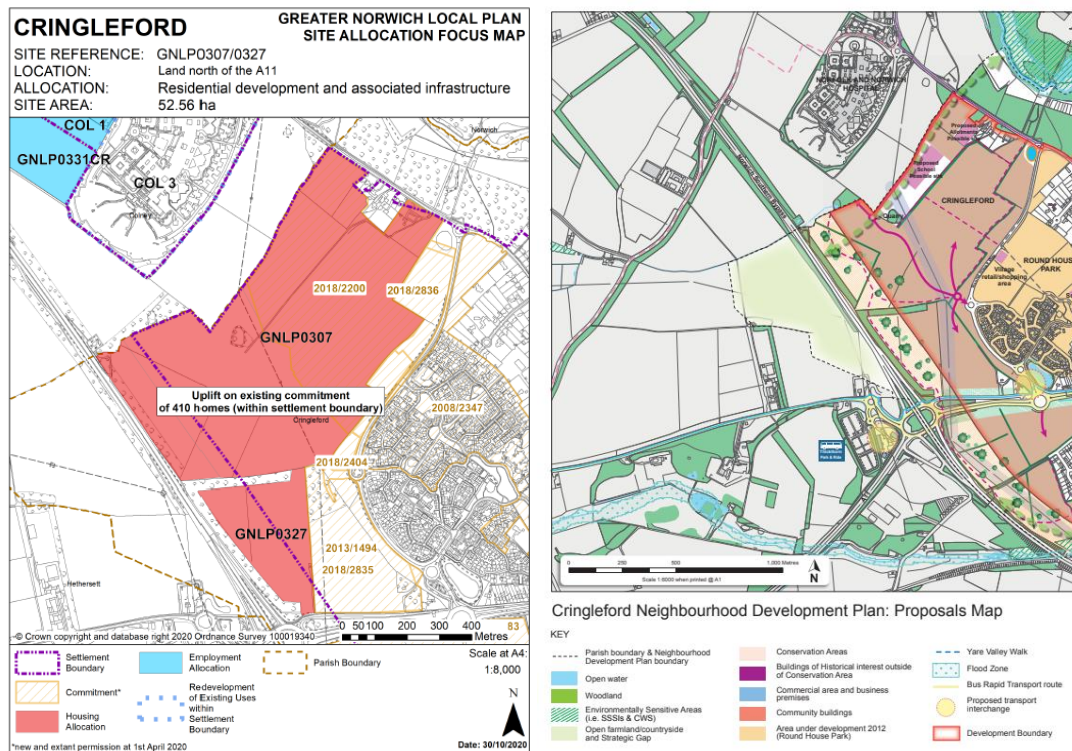
#### **Policy GNL0307/GNL0327 – Not effective or consistent with national policy**

- 1.49 In our client's response to the Regulation 18 consultation technical information was submitted to demonstrate that the balance of their site alone has the capacity to accommodate circa 500 new homes. The response included a Framework Plan and Vision Document for the site. Since submitting these details there has not been any discussion with officers about the capacity of the allocation or our client's site. Instead, it appears that the proposed uplift of 410 homes for the Cringleford allocation, which has resulted in the figure of approximately 1,710 homes in the draft policy, has been estimated by officers. The only reference to the process that has led to this this estimate is the "further discussions with Development Management colleagues" that is referenced in the Norwich and Urban Fringe Assessment (Cringleford Booklet).
- 1.50 Whilst there have been addendums to the 2017 HELAA none of these have given further consideration to the Cringleford allocation. In light of the information submitted at the Regulation 18 stage a further assessment of the allocation should have been carried out to justify the proposed uplift. In the absence of this assessment Policy GNL0307/GNL0327 is not effective or consistent with the national policy. Therefore, a more flexible approach to numbers identified for the uplift in the allocation is needed to make the most efficient use of land and boost the supply of new homes in accordance with Policy 2 and paragraphs 59 and 117 of the NPPF.

- 1.51 There is a risk that without caveating that the figure of 1,710 new homes could be increased, which the use of 'approximately' clearly indicates, it may be regarded as a maximum figure. To ensure that the plan is positively prepared and is consistent with achieving sustainable development a design-led approach should be adopted to the uplift in the allocation with the figure of 1,710, or higher based on the evidence submitted at the Regulation 18 stage, being set as a minimum.
- 1.52 The Cringleford Policy acknowledges that there is flexibility to the education provision on site and that the 3 hectares may not be needed if an equivalent alternative provision can be agreed with the education authority. If the full 3 hectares of land was not required then that would allow for additional homes to be accommodated on the site. This change alone could result in a figure of more than 1,710 new homes being accommodated on the allocation.
- 1.53 The confirmation from Highways England that the proposed improvement of the A47 Thickthorn interchange can accommodate the proposed uplift is welcomed. Our client's initial transport work indicates that a higher uplift could also be accommodated and this should not therefore represent a constraint to the development potential of the site. In accordance with the wording of the Cringleford Policy this will be confirmed through the submission of a Transport Assessment as part of the planning application for the site.
- 1.54 The requirement for a vehicular route through the adjacent development site (reference: 2013/1494), capable of serving as a bus route is something that is outside our client's control. Whilst they will work with the neighbouring developer to achieve a bus route, it is unreasonable for it to be a policy requirement as there are no guarantees it will be able to come forward. It is therefore suggested that flexibility is allowed for in the policy wording for a bus route to be provided if demonstrated to be achievable.
- 1.55 Criterion 7 requires "Provision of a drainage system (SUDs)". It is not necessary for this to be expressly required by the policy as paragraph 165 of the NPPF and Policy HOU2 of the Cringleford Neighbourhood Plan both require that developments incorporate sustainable drainage systems. Similarly, paragraph 189 of the NPPF requires that the Historic Environment Record be consulted to determine any need for archaeological surveys prior to development (criterion 6). Both these criteria could be deleted from the policy.



1.56 There is an inconsistency between the wording in the body of the policy and the Policy Map (below left), with the latter stating that the uplift of 410 homes will be “within settlement boundary”. Whilst this accords with the Proposal Map in the Cringleford Neighbourhood Plan (below right) the extended boundary of the housing allocation does not. If an amendment of the housing allocation boundary is considered acceptable then development should not be unduly constrained by the arbitrarily drawn settlement boundary. Reference to this should be removed from the Policy Map to allow the masterplanning of the site to be based on a design-led approach. This change will not result in a reduction in the buffer between new residential development and the Norwich Southern Bypass. Though it is considered necessary to allow greater flexibility for the layout of the site so that a more organic edge to the village can be created.



1.57 Our client controls 87% of the land identified to accommodate the uplift in the Cringleford allocation. If the uplift were restricted to only 410 homes then they could only deliver 357 of the homes on their land, which would result in a density of 17.68dph. This figure would be well below the average density of 44dph that has been approved on the Newfound Farm site. Clearly, such a low density would not accord with paragraphs 122 and 123 of the 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.

- 1.58 Evidence has previously been submitted through the Site Allocations consultation to demonstrate that the remainder of the BDW site at GNLP0307 has the capacity to deliver circa 500 homes. These homes can be delivered at a density of 44dph and the site will still deliver a minimum of 2 hectares of green infrastructure per 1,000 population as required by Policy 3. Therefore, even if the use of 'approximately' can be used to justify more than 410 homes across both sites it will fall well short of the 500 homes that can be delivered by continuing with the accepted design approach for Newfound Farm.
- 1.59 The ability to increase the number of new homes in the Cringleford allocation accords with GNLP objective 3 (Homes theme) "To enable delivery of high-quality homes of the right density, size, mix and tenure to meet people's needs throughout their lives and to make efficient use of land." It also accords with objective 5 (Housing) and 8 (Health) of the Sustainability Appraisal that identify that "Development proposals which would result in an increase of 100 dwellings or more would be likely to have a major positive impact on the local housing provision." and "Development proposals which would locate site end users in close proximity to one of the listed NHS hospitals, a GP surgery and a leisure centre would be expected to have a major positive impact for this objective."
- 1.60 Policy 2 seeks to make efficient use of land for development and requires that densities be "dependent on site characteristics". This point is particularly relevant to the uplift in numbers proposed for Cringleford under Policy GNLP0307/GNLP0327. The estimated figure for the uplift would fall well below the density of 44dph that was approved for the Newfound Farm development and the density set out in the Framework Plan that was submitted. This higher density will be a material consideration in the determination of the application for the uplift area and the Cringleford allocation policy needs to acknowledge this.
- 1.61 Based on the 410 homes uplift being an estimate only it is of critical importance that the Local Plan seizes every opportunity to boost housing supply to be in full compliance with paragraph 59 of the NPPF.

**Recommendation:**

- 1.62 In the absence of a justification for the uplift to be restricted to 410 new homes Policy GNLP0307/GNLP0327 should be amended to substitute 'approximately' for 'at least' and the following text should be added:



***"The final number of homes that the allocation can accommodate will be based on a design-led approach taking into account the characteristics of the sites and the densities of surrounding development."***

- 1.63 Policy GNLP0307/GNLP0327 should also be amended to allow for flexibility in the requirement for a vehicular route through the adjacent development site (reference: 2013/1494) that is outside our client's control. Please see suggested alternative wording for the Policy below:

***"If achievable, the layout shall facilitate the future delivery of a vehicular route through the adjacent development site (reference: 2013/1494), capable of serving as a bus route;"***

- 1.64 Finally, the Policy Map should be amended to delete the text "within settlement boundary".
- 1.65 The suggested additional wording would make the Policy a more effective policy tool in the context of the NPPF's test of soundness (paragraph 35) and make the Plan positively prepared.