

Greater Norwich Local Plan Reg 19 Draft Plan Consultation

Land at Dairy Farm, Thorpe End

INTRODUCTION

These representations are submitted on behalf of our client Halsbury Homes Ltd in response to the Greater Norwich Local Plan (GNLP) Regulation 19 consultation.

Our client is promoting Land at Dairy Farm, Thorpe End for residential development through the GNLP and previously submitted Regulation 18 representations in March 2020.

Since the submission of Regulation 18 representations, our Client has submitted an Outline Planning Application on the parcel of land (7.46 ha) north of the Norwich Northern Distributed Road (NDR) (Ref: 20200202 – Land at Green Lane East, Little Plumstead) which was previously included within the red line provided for the Site at Dairy Farm. This application for up to 130 market and affordable dwellings with land safeguarded for a 92 bed extra care independent living facility (use class C3) and for a medical centre (use class D1) was approved at Planning Committee on 24th February 2021.

These representations will address the following two questions from the GNLP Regulation 19 form:

- **Question 5- Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**
- **Question 6- Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Our Client considers that the Draft Local Plan in its current form is legally compliant, complies with the Duty to Cooperate and is legally sound. Nevertheless, certain Draft Strategy Policies (namely 1, 5 and 7.1) would benefit from amendments to provide greater certainty for the plan period (2018-2038). It is contended that the allocation of additional sites in sustainable locations, including Land at Dairy Farm, Thorpe End is required.

POLICY 1- THE SUSTAINABLE GROWTH STRATEGY

Policy 1 outlines the broad strategic approach for the plan period, which includes the proposed housing requirement and housing commitments.

Housing requirement

Paragraph 65 of the National Planning Policy Framework (NPPF) requires that a housing requirement is established within a Local Plan, which shows the extent to which their identified housing need can be met over the plan period.

The foreword to the Draft Local Plan identifies a "requirement" for approximately 49,500 homes over the period 2018-38. Paragraph 177 and Table 6 of the GNLP, however, identify a housing "target" for only 40,541 homes and Policy 1 identifies a "need" for approximately 40,550 homes.

The GNLP is, therefore, not only ambiguous such that it may not be effective, it also does not accord with national policy and, therefore, would benefit from a set housing requirement in strategic policies.

Recommended modification: To provide consistent references throughout the Local Plan to the 'housing requirement' as per Paragraph 65 of the NPPF.

The minimum housing need

The need for 40,541 homes is identified as having been calculated using the standard method. The standard method provides the minimum local housing need and is calculated using the average household growth for 10 consecutive years, with an affordability uplift based on the median workplace-based house price to earnings ratio of the preceding year¹. The Draft Local Plan covers the period from 1st April 2018. In order to establish the minimum local housing need for the plan period it is, therefore, necessary to calculate either the standard method at 2018; or to calculate the current standard method and apply this to the remainder of the plan period in addition to the number of completions which have already occurred.

In the case of the Greater Norwich Plan Area, the average household growth over the 10 consecutive years from 2018, namely 2018-28, was 400 in Broadland, 510 in Norwich and 704 in South Norfolk. The median workplace-based house price to earnings ratios in 2017 were 9.82, 6.93 and 8.92 respectively. Using these figures, the minimum local housing need over the plan period equates to **41,388 homes**.

¹ As confirmed in paragraph 15 of the Housing Delivery Test Measurement Rule Book.

Alternatively, the minimum local housing need from 2020 onwards can be calculated using the average household growth over the 10 consecutive years from 2020, namely 2020-30, with the affordability ratios of 2019 applied. The average household growth was 394, 505 and 680 respectively and the median workplace-based house price to earnings ratios were 9.01, 6.97 and 9.02 respectively. These figures produce a minimum local housing need of 2,008 homes per annum which equates to 36,148 homes over the period 2020-38. Table 6 of the GNLP identifies that 5,240 homes were completed in 2018-20. In addition to the minimum local housing need of 36,148 over the period 2020-38, this would again produce a minimum local housing need for **41,388 homes** over the plan period.

It is, therefore, apparent that the standard method has been miscalculated within the GNLP and that the minimum local housing need is greater at **41,388 homes**.

Recommended modification: In combination with the subsequent considerations, it will, therefore, be necessary to modify the emerging housing requirements.

Historic under-delivery

In Greater Norwich, the housing trajectory of the Joint Core Strategy identified that there would be 25,878 housing completions in the period 2008-20. However, only 20,924 homes have been delivered demonstrating that at least historically, the trajectory of Greater Norwich overestimates the developable supply by circa 23.7%. The overestimations of supply can be mainly attributed to the delivery rates of strategic infrastructure projects, and consequently, the ability of large scale SUE's to be delivered across Greater Norwich. Assuming that the current trajectory is equally as accurate, it would be appropriate to set a housing requirement which is 25% in excess of the minimum need for 40,541 homes. This would produce a housing requirement for 50,676 homes. Our Client welcomes the Council's decision to include a substantial buffer of over 20% between its housing requirement and housing supply. This is essential to ensure that the plan has sufficient flexibility to meet needs in full across the plan period.

Recommended modification: It is, therefore, recommended that a proposed minimum contingency of 25% is retained as a minimum.

POLICY 5 – HOMES

Policy 5 of the GNLP Draft Strategy sets out a requirement of 33% affordable housing on sites of 10 or more units, despite the 2017 Central Norfolk Strategic Housing Market Assessment (SHMA) identifying that there was a need for 39,486 homes, of which 28% or 11,030 homes represent affordable housing. The affordable requirement, should be based on up to date

evidence and should be subject to detailed viability testing under a range of scenarios. It is, therefore, considered that this aspect of Policy 5 will need to be amended.

Recommendation: In order to address this, it will be necessary to either recalculate the affordable housing needs based on the planned supply and then set affordable housing policies accordingly, or to reduce the affordable housing requirement within Policy 5 to 28%.

POLICY 7.1 – NORWICH URBAN AREA INCLUDING THE FRINGE PARISHES

The Draft GNLP Strategy states that the Norwich urban area including the fringe parishes² will deliver 32,691 homes over the plan period (approximately 66% of the proposed housing growth). The site at Dairy Farm would, therefore, be a valuable contribution to this target which owing to the size of the site and the fact that our Client already owns the land would be deliverable within the first 5 years of the plan period, hence also contributing to the Councils' five year housing land supply.

Land at Dairy Farm falls within the Thorpe St Andrew Growth Triangle an area identified for major growth. Situated in between the villages of Thorpe End and Rackheath the land at Dairy Farm would benefit from access to their village services as well as those within the Norwich urban area. Furthermore, there are an array of existing employment centres within the vicinity as well as a number proposed. Thereby the allocation of the small-scale housing site of Land at Dairy Farm would be in a sustainable location and would assist in providing the Councils' with greater certainty over housing delivery during the next plan period.

The Village Cluster – Broadland Assessment Booklet for Great and Little Plumstead within the GNLP's evidence base assesses submitted sites in these parishes for consideration in the GNLP. It states that the Site at Dairy Farm (ref: GNLP4030) is a "*well located urban fringe site, with easy access onto the NDR*" but following a Sustainability Appraisal (SA) it has not been proposed for allocation principally because it is considered that there is currently not a need for a development of that scale and there are other better urban fringe sites. Other concerns listed are set out in the paragraphs below:

Accessibility

The Great and Little Plumstead Assessment Booklet highlights concerns over the accessibility of existing services and facilities by walking or cycling to either Rackheath or Sprowston. The assessment does, however, go on to acknowledge that with development of the scale proposed at land at Dairy Farm (up to 1200 homes) that services and facilities as well as highway and

² The Norwich fringe is the built-up parts of the fringe parishes of Colney, Costessey, Cringleford, Drayton, Easton, Hellesdon, Old Catton, Sprowston, Taverham, Thorpe St Andrew and Trowse and the remainder of the Growth Triangle.

pedestrian improvements would be secured through the planning process. Indeed, as stated in our Client's Regulation 18 Representations there is the potential to deliver new community facilities at Land at Dairy Farm for a range of uses, including public open space. Halsbury Homes Ltd will explore further whether it may be possible to deliver some of these facilities at the Site and they would welcome the opportunity to engage with the local community to understand what kind of facility will be of greatest benefit to them. There is also the potential for off-site contributions to upgrade existing facilities. The settlements of Thorpe End and Rackheath in between which the site is located possess a range of facilities and services including a post office, village store, church, primary school and village hall.

In addition, as part of the Growth Triangle Area Action Plan (APP) proposals, there are enhancements planned for the local transport infrastructure. These include improving bus routes, and in particular, Bus Rapid Transit Corridors for which routes have been safeguarded, increasing the accessibility to the City centre. The Norwich Cycle Network is also proposed to be extended to serve the allocated sites north of the NNDR. As stated in the AAP "*The new transport links, services and facilities delivered through the coordinated development of the Growth Triangle will support existing and new communities.*" The adopted Broadland JCS (2014) establishes an effective implementation framework which will deliver this infrastructure in a timely manner. Hence, residential development located within this growth triangle will be supported by a multitude of infrastructure improvements that are proposed specifically to support such growth. It is, therefore, considered that services and facilities would be easily accessible from the Site via walking, cycling and other sustainable transport modes.

Landscape and Townscape

Comments surrounding the potential impact of the development on the landscape and townscape were raised in the site Assessment, owing to the Site's size but also its proximity to the Thorpe End Garden Village Conservation Area which abuts the south western corner. Any future planning application would be supported by a Heritage Assessment as well as a Landscape and Visual Impact Assessment which would inform the proposed layout. It is possible for development to be set back from the south western edge and separated by public open space and sensitive landscaping to ensure that there are not any adverse effects on the setting of the Conservation Area. The use of perimeter landscaping would also be explored to soften the views of development.

In addition, it is considered that the existing built form of Thorpe End to the South, the consented development to the north (Land at Green Lane East, Rackheath – ref: 20200202) as well as the presence of transport infrastructure which transects the Site (NNDR, Broad Lane road and the Norwich to Sheringham railway line), have already had an urbanising impact upon the area reducing the value of the site as 'open countryside.'

Biodiversity

Other comments raised relate to concerns over whether net biodiversity gain can be achieved through the development of the Site in line with National and Local policy. Our Client would ensure that any scheme on their Dairy Farm Site would be brought forward with the aim of achieving net gain in biodiversity through retention, protection and enhancement of any on-site habitats, provision of new public open space and high quality landscaped areas. They would also ensure that a green corridor would be maintained to the east of the site and again through sensitive design and positive enhancements would improve the ecological value of the site which in its present agricultural use is limited. Any future planning application would be accompanied by Ecological and Arboricultural Assessments to support the proposals.

Existing Buildings

Concerns were highlighted over the removal of existing agricultural buildings. A survey would be conducted to assess their current condition in the usual way. They are, however, in most other respects not appropriate for modern farming methods.

Noise

The Assessment notes concern over the impact of noise from the NNDR on potential residential development. A Noise Survey would be conducted to establish the potential effect of the NNDR and other surrounding transport infrastructure including Plumstead Road / Broad Lane and the Norwich to Sheringham railway line. The results of which would identify the requirement for potential noise mitigation measures which would then inform any potential scheme layout. Indeed, the aforementioned application at Land at Green Lane East, Little Plumstead (ref:20200202) which is subject to the same noise constraints was supported by a Noise Assessment which concluded that levels of noise recorded would not require any additional attenuation over and above standard building specifications.

Flooding

The Great and Little Plumstead Booklet notes that the Site is located within Flood Zone 1 in its entirety but identifies two main areas at risk of surface water flooding. Whilst the Booklet goes on to confirm that these would not be severe enough to prevent development, it states that they would require further consideration. Our Client would ensure that a Flood Risk Assessment would be submitted in support of any future planning application for the site which would be used to inform the subsequent drainage strategy and scheme layout.

Conclusion

The Great and Little Plumstead Assessment Booklet concludes that whilst the Site is not currently proposed for allocation "*it may be more difficult to resist development there in the future if additional housing growth is needed.*" As demonstrated by the response provided in

these representations, it is considered that the allocation of additional sustainable sites, which are available and deliverable, like Land at Dairy Farm, is required to provide greater security over the plan period.

Recommendation: In order to provide greater certainty for the plan period it is considered that additional sites in sustainable locations which are capable of delivering housing growth within the plan period should be allocated; providing the opportunity to allocate Land at Dairy Farm, Thorpe End.