

22nd March 2021
367778/A3/JD



Greater Norwich Local Plan Team
County Hall
Martineau Lane
Norwich NR1 2DH

Jonathan Dixon BA (Hons) MA MRTPI FRSA
E: jonathandixon@savills.com
DL: +44 (0) 1223 347069
F: +44 (0) 1223 347111

By email to: gnlp@norfolk.gov.uk

Unex House
132-134 Hills Road
Cambridge CB2 8PA
T: +44 (0) 1223 347 000
F: +44 (0) 1223 347 111
savills.com

Dear Sirs,

**GREATER NORWICH LOCAL PLAN
PRE-SUBMISSION DRAFT STRATEGY REGULATION 19 PUBLICATION STAGE
1 FEBRUARY – 22 MARCH 2021**

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

Background & Context

As confirmed by the representations submitted during the three previous Regulation 18 consultations, the land adjacent to the Green Lane site has full planning permission for residential development. The approved development also under the ownership of BDW, is known interchangeably as Horsford Phase 2, Kingfisher Meadows, and Land east of Holt Road, Horsford, and is currently under construction. The Green Lane site would effectively represent an eastward extension of this highly deliverable and successful site.

Savills has previously promoted the Green Lane site as having the capacity to accommodate up to 500 new homes, not the 600 that was originally recorded and referenced in the Sites Assessment Booklet. However, following further technical work, the site was promoted through the 2020 Regulation 18 C consultation for approximately 350 new homes, together with additional recreation facilities, as outlined in the **Vision Document** that accompanies both those representations and is enclosed herewith.

Format of these Representations

Set out in this letter and on the completed Forms are representations to the following elements of the Pre-Submission Plan:

- Foreword
- Policy 1 – The Sustainable Growth Strategy (Housing Need v. Requirement)
- Policy 1 – The Sustainable Growth Strategy (Level of Housing Requirement)
- Policy 1 – The Sustainable Growth Strategy (5-Year Housing Land Supply)
- Policy 1 – The Sustainable Growth Strategy (Settlement Hierarchy & Horsford)
- Policy 2 – Sustainable Communities (Energy Saving)
- Policy 5 – Homes (Affordable Housing)
- Policy 5 – Homes (Space Standards)
- Policy 7.3 – The Key Service Centres (Omission of Horsford)
- Site Allocations (Non-Allocation of Site Ref. GNLP2160).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



Foreword

The NPPF states (para. 60) (our emphasis):

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”

The Pre-Submission Plan sets out (Table 6, Row A) that the Standard Method generates a Local Housing Need of 40,541 dws from 2018 to 2038. This is the equivalent of 2,023 dpa across the 20-year plan period.

The PPG expands on this as follows (ID: 2a-001-20190220) (our emphasis):

“What is housing need?”

Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations. ...”

Government guidance is thus clear – there is a four-step process:

- 1) Determine the housing need;
- 2) Assess land availability;
- 3) Establish a housing requirement figure; and
- 4) Prepare policies and allocate sites to address the requirement.

The PPG continues (ID: 2a-002-20190220) (our emphasis):

“What is the standard method for assessing local housing need?”

... The standard method ... identifies a minimum annual housing need figure. It does not produce a housing requirement figure.”

However, the Foreword to the Pre-Submission Plan states (p. 5):

“This plan identifies where growth is needed from 2018 to 2038, with Government targets leading to around 49,500 new homes being required.”

This statement is fundamentally incorrect in several ways.

- Firstly, as above, the Standard Method calculation of Local Housing Need is only a starting point for establishing the housing requirement that should then be set out in strategic policies. As such, there are no such thing as ‘Government targets’.
- Secondly, the Standard Method Local Housing Need (which is assumed to be what is being referenced as a ‘Government target’) does not ‘lead to’ a figure of 49,500 dws being required (or does it? – see the discussion below): this is the number of new homes that the Plan provides for. As such the statement confuses the identification of the housing need, with the proposed housing supply.

OBJECT: Foreword

The statement in the Foreword therefore needs correcting. Exactly what corrections are required will depend on the answers to the queries we raise in relation to Policy 1.

Policy 1 – The Sustainable Growth Strategy

This confusion continues into Policy 1 – The Sustainable Growth Strategy. Under ‘Housing Growth Needs’ the Pre-Submission Plan states (para. 177):

“... this plan follows the required approach and local housing need derived from the 2014-based household projections is set out in row A of Table 6 below. This local housing need is the target against which land supply will be measured ...”

This statement is fundamentally flawed in several ways:

- Firstly in relation to the identification of the ‘housing need’ versus the housing ‘requirement’.
- Secondly, in relation to the level of the housing requirement.

Housing Need v. Requirement

The Pre-Submission Plan states that it ‘follows the required approach’, but the required approach set out in PPG makes it clear (ID: 2a-001-20190220 and 2a-002-20190220) that:

“... Assessing housing need is the first step in the process of deciding how many homes need to be planned for.”

and

“... The standard method ... identifies a minimum annual housing need figure. It does not produce a housing requirement figure.”

The statements in the Plan (paras. 177, 179 and opening para, to Appendix 6) that it is the Standard Method Local Housing Need figure in Row A of Table 6 that will be what housing supply is tested against confirms that the GNDP considers this figure to be the ‘housing requirement’: the PPG is very clear in this respect (ID: 68-005-20190722) (our emphasis):

“What housing requirement figure should authorities use when calculating their 5 year housing land supply?”

Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure ...”

In summary, the Plan does not follow the required approach; it follows the approach expected by the PPG as the ‘first step’ in the process. But it then fails to undertake any further steps or to establish the Local Plan ‘housing requirement’ (the term is absent from the Plan in this respect); it simply uses the figure from step 1 as a proxy for the figure in step 3, and in doing so, it is directly contrary to Government guidance that (ID: 2a-002-20190220) the Standard Method Local Housing Need figure ‘**does not**’ produce a housing requirement figure.

OBJECT: Policy 1 – The Sustainable Growth Strategy (Housing Need v. Requirement)

The Pre-Submission Plan establishes the Standard Method Local Housing Need figure, but fails to undertake any further steps, or identify a ‘housing requirement’ figure, contrary to the PPG. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

Level of Housing Requirement

In stating that it ‘follows the required approach’, the Pre-Submission Plan appears to ignore the guidance in the PPG, which explains, under the overall heading of ‘Housing Need’, the need to consider when it is appropriate

to consider a high level of housing need (ID: 2a-010-20201216):

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

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include ...:

- *growth strategies ... ;*
- *strategic infrastructure improvements ...”*

The gist of this guidance is twofold:

- 1) The Standard Method Local Housing Need provides the minimum starting point in determining the number of homes needed in an area; and
- 2) Where an area is subject to growth drivers, it is appropriate to consider whether actual housing need is higher than the standard method indicates.

It is quite possible that the Plan ignores this guidance as it calculates the Standard Method Local Housing Need and then immediately applies this as the ‘housing requirement’. In doing so it fails to appreciate that there are steps to the process between establishing the Standard Method ‘minimum’ Local Housing Need figure and a housing requirement figure. In failing to undertake these steps the Plan fails to take on board this guidance.

A statement has been added to the Pre-Submission Plan and relates directly to representations made by Savills to the 2018 and 2020 Regulation 18 consultations – i.e. that the Plan included a buffer to allow for under-delivery, but made no reference to the desire for growth. The Plan now additionally states (para. 178):

“To ensure the identified need can be met, it is normal practice to identify additional potential supply to buffer against under-delivery, typically around 10%. This plan includes a significantly larger buffer to provide the potential to accommodate higher growth rates as signalled both by the Government’s “Planning for the Future” consultation and by the 2018-based projections for Greater Norwich which are somewhat higher than the 2014-based projections. The potential growth indicated by the 2018-based projections would equate to the identification of around 5,000 additional homes. ...”

The revised text in para. 178 is somewhat of catch-all that covers a multitude of points in a confusing manner that again confuses housing need with housing supply. It is indeed common practice for a Local Plan to include additional housing sites as a buffer, to provide flexibility and for some sites to not come forward as expected. However, this is entirely separate to considering matters of ‘growth’ when determining housing need.

Whilst reference to the economy of Greater Norwich being ‘set to grow significantly’ has been removed from the Foreword to the Pre-Submission Plan, the desire for growth remains clear and evident – e.g. under ‘Planning to Our Strengths, the Plan states (para. 10) (our emphasis):

“Greater Norwich is recognised nationally as a key engine of growth and one of the fastest growing parts of the country. ...”

whilst the supporting text to Policy 1 explains that the Plan (para. 162) (our emphasis):

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

Indeed, the term ‘growth’ appears no less than 345 times in the Plan – on average several times on every page.

In addition, Savills concurs that the 2018-based household projections indicate housing need within the Greater Norwich area will be approximately 5,000 dws (or 250 dpa) more than indicated by the 2014-based projections that are used to calculate the Standard Method Local Housing Need – a c. 10% uplift. Indeed, over the past three years, housing delivery across the Greater Norwich Area has averaged 2,463 dws, again c. 10% more than the Standard Method figure. This suggests a level of housing need that is c. 10% higher than the Standard Method figure.

What the Plan does state is (para. 185):

“The Government encourages authorities to consider higher levels of [housing] growth than that required to meet [Standard Method-calculated] local housing need, particularly where there is the potential for significant economic growth. Our overall approach, including to windfalls, contingency and having a significant buffer, builds in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal.”

This appears to be a misunderstanding of the guidance provided in the PPG, as referenced above (ID: 2a-010-20201216). The Government does indeed offer encouragement and support for ‘ambitious authorities who want to plan for growth’, and suggests that such strategies for growth are an example of one circumstance where ‘it is appropriate to consider whether actual housing need is higher than the standard method indicates’. It does so under the overall heading of ‘housing need’ and not ‘housing supply’.

Rather than doing as recommended by the guidance, and considering whether housing need is higher than the minimum figure identified by the Standard Method, the Pre-Submission Plan instead asserts compliance by referencing the proposed housing supply. The consideration of the need for additional housing over and above the Standard Method minimum is part of the process of establishing the Local Plan housing requirement, rather than the process of identifying a sufficient supply to meet that requirement.

What is surprising is that the Plan takes this approach despite the express commentary in the PPG that the consideration of whether actual housing need is higher than the standard method indicates (ID: 2a-010-20201216):

“... will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan).”

The PPG is clear in that the consideration of a higher need should take place prior to the establishing of a housing requirement, all of which should be undertaken before the identification of a housing supply. The Pre-Submission Plan conflates all of these into a single consideration, directly contrary to the guidance.

In summary, the Pre-Submission Plan’s approach to considering the implications of economic growth drivers, as part of housing supply rather than housing need, represents a fundamental misunderstanding of the process of establishing the Local Plan housing requirement, and results in a substantial weakening of the proposed strategy and increased risk that insufficient housing will be delivered and economic growth undermined.

OBJECT: Policy 1 – The Sustainable Growth Strategy (Level of Housing Requirement)

The Pre-Submission Plan, in failing to identify a ‘housing requirement’ figure other than the minimum Standard Method Local Housing Need figure, fails to take into account evidence of higher levels of housing needs, or to plan for a level of housing need that reflects other parts of the Plan, specifically drivers for economic growth, and is thus contrary to the PPG. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

The above discussion is particularly relevant to the monitoring of housing delivery across the Greater Norwich area, and the implications of that.

It is unknown what uplift the GNDP would consider appropriate as a consequence of the various indicators, but for working purposes, it is considered that the following are three reasonable comparators:

- As drafted, the Pre-Submission Plan sets out a housing requirement of 40,541 dws over the 20-year plan period, equivalent to an annual average of 2,023 dpa.
- If the 2018-based household projections referenced in para. 40 of the Plan were used to calculate housing need using the Standard Method, the housing requirement would be 44,878 dws, equivalent to 2,244 dpa.
- If the total number of new homes provided for by Policy 1 (49,492 dws) was used as the housing requirement, this would be equivalent to 2,476 dpa.

For reference purposes, between 2017/18 and 2019/20, housing delivery across the Greater Norwich Area has averaged 2,463 dws¹.

On the basis of the three above comparator figures, the 5-year housing land supply requirement would be:

- Pre-Submission Plan (Standard Method using 2014-based household projections): 10,621 dws
- Standard Method using 2018-based household projections: 11,781 dws
- Policy 1 housing provision: 12,999 dws

Depending on which figure represents the 'housing requirement' in the Plan, it is clear that there are substantial potential ramifications.

5-Year Housing Land Supply

The NPPF states (para. 73):

“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies ...”

The PPG explains (ID: 68-008-20190722):

“In plan-making, the Inspector examining the plan will test the evidence to ensure that the 5 year housing land supply identified in strategic policies is sound. If it is not, wherever possible the Inspector will recommend main modifications to the plan to ensure that the plan identifies a 5 year housing land supply from its date of adoption. ...”

Whilst Appendix 6 provides a high-level housing delivery trajectory, it does not include sufficient detail in relation to individual sites or their deliverability. Without such detail, it will be impossible for the Inspector to be sure that it will be possible for the GNDP to demonstrate a 5-year housing land supply (5YHLS) on adoption of the Plan. Without this detail there can be no certainty that sufficient, deliverable, sites are being allocated. In summary, the Pre-Submission Plan does not include evidence to sufficiently demonstrate that there will be a 5YHLS on adoption of the Plan.

¹ As per the 2020 Housing Delivery Test results..

OBJECT: Policy 1 – The Sustainable Growth Strategy (5-Year Housing Land Supply)

The Pre-Submission Plan fails to sufficiently demonstrate that it will be possible to demonstrate a 5YHLS on adoption of the Plan. As such, the Plan is not justified, will not be effective, and is not consistent with national policy.

Settlement Hierarchy & Horsford

The Pre-Submission Plan sets out the largest settlements, by population according to the 2011 census, within the Greater Norwich area (Table 1):

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

The Plan then sets out a 'settlement hierarchy' (para. 191 and Policy 1):

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

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

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

What is not clear is why Horsford – the ninth largest settlement in the entire (three-district) Greater Norwich area, is the only settlement listed in Table 1 that is not within the top three tiers of the hierarchy. Indeed, there is an obvious absence of explanation or justification for the proposed hierarchy in the Pre-Submission Plan. To understand the background for the hierarchy, one has to look to the Sustainability Appraisal of the Pre-Submission Plan, which discusses the topic briefly and refers to the ‘Growth Options Document’, which formed part of the Regulation 18 A consultation in 2018, but forms neither part of the Regulation 19 consultation nor part of the evidence base. The Growth Options Document states (para. 4.4.3):

“The current levels in the hierarchy set out in the JCS [Joint Core Strategy], are “Norwich Urban Area”, “Main Towns”, “Key Service Centres” (KSCs), “Service Villages”, “Other Villages” and “Smaller Rural Communities and the Countryside”

and (para. 4.4.6):

“KSCs are ... are Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framlingham Earl, Reepham and Wroxham.”

In summary, the only justification for the settlement hierarchy in the Pre-Submission Plan is contained in a document that does not form part of the Regulation 19 consultation nor part of the evidence base. Moreover, it would appear that the settlement hierarchy proposed is in fact taken directly from the Joint Core Strategy (JCS), without any amendment or re-consideration of events that have occurred over the decade since the JCS was first adopted. As a result it fails to recognise material changes that have occurred in the interim – for instance the completion and opening of the Norwich Northern Distributor Road, which have fundamentally changed to context of some settlements, such as Horsford, significantly improving access to social and economic infrastructure.

The settlement of Horsford has grown substantially over recent years, with the last decade of growth not being reflected in the above figures, and is continuing to grow. Combined, three planning permissions relating to the land adjacent and to the south of the Green Lane site (refs: 2013/0547, 2016/1770 and 2019/0999) have permitted a total of 429 new homes, with 235 homes completed by March 2021 (see the section on ‘delivery’ later in these representations). Together these new homes will increase the population of Horsford by approximately 1,000 (and there have been further permissions), likely elevating it yet further in the list of the largest settlements as indicated below (noting that growth in other areas would also need to be taken into account), potentially to the sixth most populous settlement in the Greater Norwich area:

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

As explained in the section on ‘delivery’ below, it is projected that delivery of the adjacent site will be complete by mid-2024, with an average of around 40 new homes per annum having been built and sold by then over the preceding decade (i.e. 2013 – 2024).

The statement set out in para. 6.64 of the 'Sites Plan' that forms Part 2 of the Pre-Submission Plan, that additional residential development in Horsford will be limited to only 20-50 new homes over the remaining 15-year period (i.e. 2023 to 2038) would appear at odds with the requirement in the NPPF that development plans be 'positively prepared', and a failure to continue with what has proved to be a very successful and consistent source of housing delivery.

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

It would be wrong for the GNLP, in planning for the next two decades, to fail to reflect this growth in population and plan properly for the needs of the growing community. Together with the recent and continued growth (the remaining permitted development is projected to be complete by mid-2024), additional housing growth could help support existing and new facilities and enable the village to become even more sustainable.

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

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

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

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

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

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

Within a few years, Horsford will have a population of around 5,000 or more (if it does not already). The draft GNLP proposes that only a single site (ref. GNLP0264) in Horsford be allocated for housing development, for 30-40 dws, which will provide new homes for only around 80 people. This will represent a growth rate over the latter 15 years of the plan period (2023-38) of just 1.6%, in the largest village cluster, that is acknowledged by the LPA to be a 'sustainable location for additional residential development'.

It is considered that this is not positive planning.

The 'Sites Assessment Booklet' for Horsford states:

"HORSFORD, FELTHORPE AND HAVERINGLAND

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

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

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

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

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

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

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

The solution is straightforward: to recognise Horsford as the Key Service Centre that it truly is. It is one of the most populous settlements in the Greater Norwich area, it is barely a few kilometres from Norwich airport and various other employment areas, and the January 2018 Regulation 18 A Grown Options document identified that the settlement possessed all core services and all secondary services bar one – a Post Office; but there is indeed a Post Office in the centre of Horsford. In summary, Horsford should be reclassified as a Key Service Centre, and an appropriate and increased level of growth assigned to it.

OBJECT: Policy 1 – The Sustainable Growth Strategy (Settlement Hierarchy & Horsford)

The settlement hierarchy in the Pre-Submission Plan is not based on an up-to-date assessment, fails to reflect current circumstances, and, as such, the Plan has not been positively prepared, is not justified, and will not be effective. The evidence suggests that Horsford should be reclassified as a Key Service Centre, and an appropriate and increased level of growth assigned to it. As it stands, the Plan is not justified, will not be effective, and is not consistent with national policy.

Policy 2 – Sustainable Communities (Energy Saving)

The Pre-Submission Plan requires that (Policy 2, criterion 10, second bullet point):

“... All new development will provide a 19% reduction against Part L of the 2013 Building Regulations (amended 2016) ... except where a lower provision is justified because the requirement would make the development unviable”:

The supporting text (Table 8) explains that:

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

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

...

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

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

* Footnote 65 to the text in the tables references the ‘Greater Norwich Energy Infrastructure Study’ (March 2019), which forms part of the evidence base to the Pre-Submission Plan.

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

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

It would thus appear that the requirements of Policy 2 are not supported by the evidence upon which it relies.

Notably, one of the ‘alternative approaches’ set out in the Regulation 18 C (January 2020) consultation draft of the GNLP (wherein the 19% reduction was a 20% reduction) explained (p. 63):

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

The above suggests that any more than a 20% reduction (e.g. 21%) would be universally unviable, but that a 20% reduction will be viable – this suggests that the policy is requiring a reduction that will result in all housing developments being very close to being, and thus potentially, unviable. It is notable that the caveat ‘except where a lower provision is justified because the requirement would make the development unviable’ has been added to the Pre-Submission Plan; however the addition of such a caveat does not result in an otherwise unevidenced, unjustified and thus unsound policy suddenly becoming evidenced, justified and thus sound

The change from 20% to 19% is entirely unexplained.

OBJECT: Policy 2 – Sustainable Communities (Energy Saving)

The requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not supported by the evidence upon which Policy 2 relies. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

Policy 5 – Homes (Affordable Homes)

The Pre-Submission requires (Policy 5):

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

- *at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28% ...”*

The supporting text (para. 271) explains that:

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

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

The requirement for 28% affordable housing is based on the conclusions of the SHMA (June 2017) (as

explained in para. 58 of the Pre-Submission Plan), which identified (Figure 83) a need for 11,030 affordable homes out of a total requirement of 39,486 homes across the Greater Norwich Area over the 21-year period 2015-36, or 526 (rounded up) affordable homes per year out of a total requirement of 1,881 (rounded up) dpa.

The housing proposed in the Pre-Submission Plan is 2,476 dpa, some 32% (595 dpa) higher than the annual average need identified in the SHMA (noting that in terms of identifying housing need the SHMA has been set aside).

If a 28% requirement were applied to the full planned provision of 2,476 dpa it would deliver 694 (rounded up) affordable homes per annum. Noting that the requirement won't apply to sites of less than ten dwellings, if 10% of new homes were to be built on sites of less than ten dwellings, 624 (rounded up) affordable homes per annum would still be delivered. If the 33% requirement were applied to 70% of sites, the 28% requirement to 20% of sites, and 10% of sites exempt, 711 (rounded up) affordable homes per annum would be delivered, some 35+% (185 dpa) more than identified as required by the evidence base to the Pre-Submission Plan.

The third bullet point in para. 271 provides some justification for the application of a 28% requirement to sites in Norwich City Centre, but neither the policy nor the supporting text, nor the SHMA provide any quantitative justification for the proposed requirement for 33% on other sites.

The reference to 'at least' 33% adds further confusion – is this intended to simply require the rounding-up of a calculated percentage or a substantially greater provision, potentially one where every application will be required to be the subject of a viability exercise to determine the maximum level of affordable housing that can be provided? It simply isn't clear.

OBJECT: Policy 5 – Homes (Affordable Housing)

There is no evidence or justification for the proposed 33% requirement as set out in the Pre-Submission Plan; and the reference to 'at least' requires clarification. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

Policy 5 – Homes (Space Standards)

The NPPF (para. 127) sets out that:

“Planning policies and decisions should ensure that developments:

...

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

Footnote 46 to criterion (f) explains that (our emphasis):

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

PPG does further, stating (ID: 56-002-20160519) (our emphasis):

“... Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.”

And (ID: 56-020-20150327) (our emphasis):

“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies.”

Key to the extracts above is the identification of a 'need' for the adoption of a policy setting space standards.

The Pre-Submission Plan (Policy 5) requires that:

“All housing development proposals must meet the Government’s Nationally Described Space Standard for any internal space or any successor.”

The supporting text (para. 274) explains that:

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

Footnote 91 explains that the ‘local evidence of need, viability and timing’ is as contained in the ‘Greater Norwich Local Plan Nationally Described Space Standards Study’ (August 2019), which is included as Appendix D to the ‘Viability Appraisal’ (December 2020), part of the evidence base to the Pre-Submission Plan.

Whilst the Space Standards Study uses the term ‘need’, there is no evidence presented as to why there is a ‘need’ for a policy to require compliance with the Nationally Described Space Standards. Indeed, the Study concludes (there are no para or page numbers):

“... local evidence shows that 75% of homes have achieved the NDSS Gross Internal Area requirements ... [and that other aspects] ... of the standards have been achieved in the great majority of new homes ...”

The Study asserts that this level of compliance ‘shows a need’ for such development, but seems to consider this as both demonstrating the need for and justifying a policy requirement, whereas on a plain reading of the requirements of the NPPF and PPG, it clearly does not. Therefore, no need for such a policy requirement has been demonstrated.

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

The PPG explains (ID: 56-020-20150327), with reference to ‘viability’:

“... Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.”

Whilst the Space Standards Study discusses, in the round, the potential risk to the viability of housing developments and housing delivery rates, it skips lightly over the potential impact on sales prices, simply concluding (our emphasis):

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

This statement is included without reference or justification, with the use of the terms ‘unlikely’ and ‘possible’ indicating that the GNDP does not have the required justification for the proposed policy. Simply, the GNDP has undertaken no quantitative viability assessment of the proposed policy requirement.

OBJECT: Policy 5 – Homes (Space Standards)

The Pre-Submission Plan fails to sufficiently demonstrate that a policy requirement that development comply with the NDSS is ‘needed’, and notwithstanding this, nor does it include sufficient justification. As such, the Plan is not justified, will not be effective, and is not consistent with national policy.

Policy 7.3 – The Key Service Centres

Our representations to Policy 1 in relation to the settlement hierarchy and Horsford (which we do not repeat here in this letter) are also pertinent to Policy 7.3, inasmuch as Horsford is not identified as a Key Service Centre.

OBJECT: Policy 7.3 – The Key Service Centres (Omission of Horsford)

The settlement hierarchy in the Pre-Submission Plan is not based on an up-to-date assessment and, as such, the Plan has not been positively prepared, is not justified, and will not be effective. The evidence suggests that Horsford should be reclassified as a Key Service Centre, and an appropriate and increased level of growth assigned to it. As it stands, the Plan is not justified, will not be effective, and is not consistent with national policy.

Site Allocations – Land to the South of Green Lane, Horsford (Site Ref. GNLP2160)

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

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

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

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

...

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

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

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

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

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

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

In that Addendum, the Green Lane site was scored as follows:

Constraints Analysis

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

Impacts Analysis

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

Savills has submitted representations to both the 2018 Regulation 18B and 2020 Regulation 18C consultations and addressed each of the criteria on which the site had been scored 'amber' as set out below. To this has been added further comment in respect to 'Significant Landscapes' and 'Townscapes'. Given that the studies submitted in 2018 identified the capacity to accommodate up to 500 new homes, there is clearly capacity to accommodate the 350 new homes now being promoted.

Access / Transport & Roads

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

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

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

Accessibility to Services

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

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

Utilities

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

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

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

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

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

Drainage / Flood Risk

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

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

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

Significant Landscapes / Townscapes

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

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

Overall, the LVA concluded:

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

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

Biodiversity and Geodiversity

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

around the site.

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

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

Historic Environment

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

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

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

Transport & Roads

See ‘Access’ above.

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

Summary

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

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

Constraints Analysis

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

Impacts Analysis

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

However, despite the HELAA explicitly recognising and stating that it only represents “...a snapshot of the position at a particular point in time and will need to be updated regularly as plan preparation progresses ...” the GNDP has not sought to update any of the HELAA assessments carried out to date; in essence, the HELAA ignores all of the additional information submitted through previous consultations. By way of example, the HELAA still concludes that the two sites adjacent to the Green Lane site – one of which has been completed, and one of which is under construction, are ‘not considered to be suitable for allocation’. Savills thus contends that the conclusions of the individual site assessments as contained in the HELAA cannot be relied upon as being accurate.

Instead, the Site Assessment Booklet for Horsford published as part of the supporting documentation to the January 2020 Regulation 18C consultation continued to state:

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

With regard to the issues raised in this commentary as being reasons to dismiss the site, Savills commented in representations to the January 2020 Regulation 18C consultation:

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

The response from the GNDP as set out in Part 2 of the Site Assessment Booklet for Horsford published as part of the evidence base for the Regulation 19 consultation states:

“Further discussions have taken place regarding this site in relation to this representation. The view continues to be that this site is too large for the needs of the Horsford cluster. It is recognised that a smaller part of the site could be considered but even then this is not thought to be the right place for more housing development in Horsford. The preferred site is more centrally located and has the benefit of being a brownfield site.

The local highway authority have confirmed that further development would require additional access to the B1149 and cannot be serviced via phase 2 and the existing roundabout. The proposed access strategy services the whole development via the existing roundabout which is not acceptable. Vehicular access could be considered via Green lane and Mill Lane with appropriate improvements.”

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

- It is stated that “... *the view continues to be that this site is too large for the needs of the Horsford cluster ...*”. This is an entirely unevidenced comment – what are the ‘needs’ of the Horsford cluster? During the course of the preparation of the GNLP, a total of 429 new homes have been permitted on land adjacent and to the south of the Green Lane site (refs: 2013/0547, 2016/1770 and 2019/0999), all supported by the LPA and granted without recourse to appeal. Savills would assert that the GNLP have no evidence as to the ‘needs’ of the Horsford cluster, and that there is no evidence to support this assertion.
- It is stated, in relation to the potential for a smaller part of the site to be considered, that “... *this is not thought to be the right place for housing development in Horsford ...*”. This is again an entirely unevidenced comment – noting the detailed analysis discussed above, what ‘thoughts’ lead to the site not being ‘right place’. The Green Lane site is located adjacent to the primary school, in a location considered suitable for housing over the course of three recent applications, and the Stage 4 assessment of the site concluded (our emphasis):

“... GNLP2160 is also considered to be a reasonable alternative.

GNLP2160 is better located to the services in the village (and most particularly the school) when compared to the other large-scale sites in Horsford ...

The assertion that the proposed allocation (Site 0264) is better located as it is “... *more centrally located ...*” is contradicted somewhat by the fact it is adjacent to the southern edge of the settlement.

- Whilst Savills has submitted evidence on behalf of BDW to demonstrate that a suitable and safe access can be provided through the existing development, only unevidenced assertions have been provided to counter this, concluded with a statement that the proposed access strategy “... *is not acceptable ...*” without any explanation as why it is not; however notably the Local Highway Authority then go on to propose an alternative.

OBJECT: Site Allocations (Non-Allocation of Site Ref. GNLP2160)

The HELAA assessment is factually incorrect and there is no remaining evidence or justification for the non-allocation of Site Ref. GNLP2160. As such, the Pre-Submission Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

Delivery

BDW Homes (Eastern Counties) have a very good record of delivery within Horsford. Of the two sites adjacent to the Green Lane site, Phase 1 (125 dwellings) was completed June 2017 and Phase 2 (304 dwellings) is currently under construction (see further details in the table below). It is anticipated that Phase 2 will be completed by the end of 2024. BDW can also demonstrate successful delivery of other residential sites across the Greater Norwich area, including sites in Aylsham and Poringland.

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

Delivery on the Green Lane site could commence as early as 2023 (i.e. within the first 5-years of the plan period, extending into the second 5-years), and would deliver c. 100 new homes a year.

Track Record

Location	Number of homes approved	Number of homes completed	Complete date (anticipated or actual)	CIL payments made (Yes, No, N/A)
Sir Williams Lane, Aylsham	300	300	Completed November 2019	N/A
Caistor Lane, Poringland Phase 1	150	150	Completed October 2018	N/A
Stoke Road, Poringland Phase 2	120	120	Completed Mid 2020	Yes, two payments totalling £658,587.40
Horsford Phase 1	125	125	Completed June 2017	N/A
Horsford Phase 2	304	110 completed by March 2021	To be completed by end of 2024	1st instalment paid: £391,528.10 2nd instalment paid: £391,528.10 3rd instalment paid: £522,037.46 4th instalment paid: £1,305,093.64 Additional 45 units also subject to CIL

Summary

We trust that these representations will assist.

Yours sincerely

Jonathan Dixon
BA (Hons) MA MRTPI FRSA
Director

- Encs:
- 10 x Completed Regulation 19 Representation Forms
 - Vision Document (Savills), March 2020
 - Highway Capacity Assessment and Public Transport Provision Review for Phase 3 Development (Richard Jackson), 6 December 2018
 - Education Report: Land at North Horsford (Phase 3) (EFM), December 2018
 - Utilities and Drainage Review (BDW), 29 November 2018
 - Ecological Report (TMA), December 2018
 - Cultural Heritage Desk-Based Assessment (RPS), March 2020
 - Landscape and Visual Appraisal (CSA), February 2020