

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

22nd March 2021

Dear Sir/Madam,

**GREATER NORWICH LOCAL PLAN- REGULATION 19 PRE-SUBMISSION DRAFT PLAN
LAND AT BAWBURGH LANE, COSTESSEY**

Thank you for inviting comments on the Greater Norwich Development Partnership (2021) Greater Norwich Local Plan (GNLP) Regulation 19 Consultation. Terra Strategic have interests in land on the edge of Costessey, referred to as 'Land off Bawburgh Lane, Costessey' (the 'Site'). Terra Strategic are experienced land promoters with a proven track-record with the promotion of sites through the Local Plan process through to securing deliverable planning permissions.

These representations respond to the Pre-Submission Publication Draft Plan, comprising the Draft Strategy Document, Draft Site Allocation Plan and associated Evidence Base (including the Site Assessment Booklets, Sustainability Appraisal, Housing and Economic Land Availability Assessment (HELAA), Strategic Housing Market Assessment (SHMA), and Infrastructure Needs Report). The draft Plan identifies a joint planning strategy for growth across the Greater Norwich area (comprising Norwich City, Broadland and South Norfolk districts) for the period 2018 – 2038.

The Site has been previously promoted through each stage of the Greater Norwich Local Plan process, most recently through the Stage C Regulation 18 Draft Strategy and Site Allocations Consultation (29th January – 16th March 2020). Following this consultation, Terra Strategic are now actively engaged with promoting the Site through the emerging Local Plan – further demonstrating the deliverability of the Site for residential-led development.

The Site is currently allocated as part of draft Policy GNLP0581/2043 as a contingency site for residential-led development. For the avoidance of doubt, Terra Strategic control the northern section of the allocation, which has the site reference: GNLP0581. This area of land has the ability to deliver approximately 600 dwellings alongside a primary school, sixth form college and local centre. The Site is allocated alongside adjacent site ref: GNLP2043 (North of New Road, east of A47), which will deliver an additional 200 dwellings – approximately 800 dwellings across the draft allocation. Terra Strategic are in discussions with the adjoining landowners with a Masterplan provided at **Appendix 1** which details how the two parcels of land could come forward.

As currently drafted, the Site would come forward for development if there were three consecutive years in which Annual Monitoring Reports show that housing completions in Greater Norwich are more than 15% below annual targets in each year and where under-delivery is the result of site specific constraints (for example there are infrastructure or ownership constraints or significant abnormal costs have been identified) preventing the delivery of committed and allocated housing sites

As will be set out within these representations, this approach is considered to be unsound and should instead be identified as a full allocation within the forthcoming GNLP as an available, suitable and sustainable location to deliver residential-led development.

Draft Site Allocations Plan: Policy GNLP0581/2043: Land off Bawburgh Lane, north of New Road and east of the A47, Costessey

As set out above, the Site is allocated as part of draft Policy GNLP0581/2043 as a contingency site for residential-led development. This approach is considered unsound in its current form. Paragraph 67 of the National Planning Policy Framework (NPPF) sets out that planning policies should identify a supply of specific, deliverable and developable sites. The Site represents a suitable location for development now, it is available immediately, is achievable with a realistic prospect of housing being delivered on the site and is viable. On that basis, it should form a full allocation on adoption of the emerging Local Plan.

Indeed, the Site has been reviewed by the Greater Norwich Authorities through various Housing and Economic Land Availability Assessment (HELAA) exercises and through the 'Costessey Site Assessment' Booklet as site GNLP0581 (Land off Bawburgh Lane and New Road). The adjacent site GNLP2043 (North of New Road, east of A47) was also reviewed.

The HELAA (2017) provides evidence on the range and extent of land which could be considered for development to meet the objectively assessed need for housing and employment. In relation to the Site, the HELAA concluded that:

- **Suitable-** For the purposes of the HELAA capacity assessment the Site is considered 'suitable'.
- **Available-** The HELAA concludes that the Site is likely to be available in 1 to 5 years and deliverable in 5 to 10 years.
- **Viable-** In terms of site viability, the HELAA concludes that this site has been submitted by a landowner/promoter as viable for the form of development proposed and is assumed to be developable within the plan period in accordance with the timescales above.

We agree with this assessment and consider that the Site can deliver dwellings within the first five years of the Plan period and would be fully delivered within ten years.

Furthermore, it is noted that the Council has produced a Site Assessment Booklet for Costessey. The HELAA comparison table (Stage 2) within the Costessey Booklet confirms that the Site (GNLP0581) scores either 'Green' or 'Amber' across all of the categories assessed. None of the categories were shown as red. The discussion of submitted sites (Stage 4) confirms that the Site is considered to be a 'reasonable alternative' for further consideration in line with the growth strategy.

The detailed site assessment of 'reasonable alternative sites' reiterated the conclusions set out in the HELAA. The commentary concludes that it is *"a large site, separated from Bawburgh by the A47 with good accessibility to services in Costessey and Bowthorpe. It is adjacent to a recent Local Plan allocation and existing residential development"*. Several constraints are identified (such as overhead power lines, an adjacent contaminated site, landscape impacts, surface water flooding and townscape concerns) however subject to being able to overcome these the site is concluded as *"suitable for the land availability assessment"*. As set out at **Appendix 1**, it is considered that these constraints can be suitably overcome to achieve a deliverable development for up to 800 dwellings with associated uses.

Stage 7 focussed on a settlement-based appraisal and identification of preferred sites. This confirmed that the Site is considered to be a 'reasonable alternative' if further housing is needed in the urban area. The site was not preferred for allocation, but it is included as a contingency site (along with GNLP2043) in the draft Local Plan for up to 1,000 dwellings should this prove to be required due to

low delivery of allocated housing sites. The reasons for not fully allocating the Site are as follows, with our response to these matters in *italics*:

1. Issues regarding access and the site's location in the Norwich Southern Bypass Protection Zone and designated river valley.

*Terra Strategic comment: The Site is located within the Norwich Southern Bypass Protection Zone, as set out within Policy DM4.6 (Landscape Setting of Norwich) of the South Norfolk Development Management Policies Document. However, it is noted that the policy does not preclude development coming forward, subject to it enhances the landscape setting of the southern bypass and includes the practice of wild flower planting and management regimes. As set out at **Appendix 1**, the built form will be set back from the bypass, ensuring the landscape setting is retained. The planting strategy could also be secured through any subsequent planning permission.*

The Site also falls within the 'River Valley' designation as set out by Policy DM 4.5 (Landscape Character and River Valleys) of the South Norfolk Development Management Policies Document. Similarly, this policy does not preclude development coming forward. Indeed, in accordance with Policy DM 4.5 it is considered that the proposed development could come forward whilst protecting the distinctive characteristics and special qualities of the Rural River Valleys and Valley Urban fringe landscape character types.

2. Limited evidence has been submitted regarding its deliverability.

Terra Strategic comment: The Site is being promoted by Terra Strategic with significant experience in the promotion and delivery of residential land.

3. Availability of third-party land to deliver both proposed accesses has to be confirmed.

Terra Strategic comment: Terra Strategic are working pro-actively with the adjoining landowner to allow the comprehensive development of the allocation. As such, there are considered to be no third-party issues which would impact upon the allocation coming forward.

4. Access to Long Lane for all traffic would not be appropriate.

*Terra Strategic comment: As set out at **Appendix 1**, vehicular access will be provided onto Long Lane as well as New Road to the south and Draper Way and Barnard Way to the east. This will ensure permeability through the Site as well as reducing the highways impact on Long Lane.*

As such, we consider that each of the issues raised as part of the 'Stage 7' can be suitably addressed.

The Site was then resubmitted during the Regulation 18C consultation for a reduced area from 49.65 ha to 40.39 ha. This would exclude an area of land to the south and instead deliver approximately 600 dwellings (Site Ref: GNLP0581R). However, the final conclusions confirmed that Site GNLP0581 continues to be favoured as a contingency site but on its original site boundary not the revision put forward through the Regulation 18C consultation. Sites GNLP0581 (along with GNLP2043) are therefore identified as a contingency site in the Regulation 19 version of the plan for 800 dwellings. We agree with this assessment and consider that the allocation represents a suitable and sustainable location to deliver approximately 800 dwellings.

However, in terms of education provision, the SA concludes that a ‘major positive impact’ is expected given a new primary school and sixth form college is to be provided. This is supported and we wish to reinforce that approximately 4 hectares of the Site is to be safeguarded for education use. The Site Assessment Booklet confirms that Costessey has considerable pressure for pupil places and would not be able to cope with further growth without new school provision. The draft Local Plan confirms that the GNLP will need to make provision for additional schools and school places to serve growth, the provision of a new primary school and sixth form college would help to reduce the existing pressure for pupil spaces and allow for growth within a Strategic Growth Area. It is also noted that the Infrastructure Needs Report sets out that for the September 2019 and 2020 intakes, the need for primary school places has been particularly challenging in pockets of growth.

Given that the Site can deliver this educational land at the beginning of the Plan period, we would consider there to be a specific need for the Site to come forward as a full allocation. Failure to do so, will lead to significant pressure for school places within the local area.

This approach would ensure that the draft Local Plan is ‘positively prepared’ as required by paragraph 35 of the NPPF (2019). The Site is deliverable, and capable of making a significant contribution towards satisfying the Councils’ housing needs during the period to 2038. The contingency approach constrains flexibility of supply in a location which the GNLP has acknowledged are the most sustainable and would not deliver the educational land that is required.

Indeed, the Site would deliver a wide range of economic, social and environmental benefits. The Sustainability Appraisal (SA) January 2021 highlighted a number of positive scores sites in Costessey and shows that contingency sites GNLP0581 and GNLP2043 both score double positives for housing, population and communities, education and economy. The SA confirms that the Site would have a ‘major positive impact’ on housing provision and on populations and communities, with the proposed development incorporating a new local centre to include a convenience food store and three smaller units.

Trigger Mechanism for the Site to become a full allocation

Notwithstanding the above comments, if the Authorities remain of the view that the Site should be allocated as a ‘contingency site’, we suggest that the policy wording is amended to ensure it is positively prepared, effective and consistent with national policy.

As it currently stands, the site will become an allocation if *“there are three consecutive years in which Annual Monitoring Reports show that housing completions in Greater Norwich are more than 15% below annual targets in each year and where under-delivery is the result of site-specific constraints (for example there are infrastructure or ownership constraints, or significant abnormal costs have been identified) preventing the delivery of committed and allocated housing sites”*.

The policy is unsound in its current form due to the proposed trigger mechanism which would allow the site to come forward. In particular, through Examination of the Local Plan, the Council should have robustly assessed the ‘site specific constraints’ of the alternative commitments and allocations. Indeed, the draft Delivery Statement sets out a pro-active approach to delivery through only allocating housing sites where a reasonable prospect of delivery can be evidenced. As a result, this requirement should be deleted and instead focused on any subsequent shortfall in housing delivery.

The PPG sets out that from the day following publication of the Housing Delivery Test measurement, where delivery of housing has fallen below the housing requirement, certain policies set out in the

NPPF will apply. Depending on the level of delivery, this states that the LPA should publish an action plan if housing delivery falls below 95% (NPPF, para 75).

To ensure consistency with the national policy and guidance, the following policy wording is suggested:

*The site will become an allocation if **the Council's Housing Delivery Test trajectory shows that delivery is expected to fall below 95%** ~~there are three consecutive years in which Annual Monitoring Reports show that housing completions in Greater Norwich are more than 15% below annual targets in each year and where under delivery is the result of site specific constraints (for example there are infrastructure or ownership constraints or significant abnormal costs have been identified) preventing the delivery of committed and allocated housing sites.~~*

As currently drafted, the policy wording is considered too restrictive and would prevent the contingency site from being allocated until there are three consecutive years in which Annual Monitoring Reports show that housing completions in Greater Norwich are more than 15% below annual targets in each year. This does not accord with the NPPF (para. 11), which states that plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. Indeed, as currently drafted, a Housing Delivery Test result of 14% at any point would result in the Site remaining unallocated – regardless how significant the shortfall was in previous years or whether the Council fails to meet the Housing Delivery Test over a prolonged period.

Having a three-year trigger mechanism, does not allow the Council to rapidly respond to any shortfall in housing delivery. It is therefore considered that linking the release of the Site to a single year shortfall would provide an immediate response to addressing housing need within an area that is confirmed as sustainable for residential development.

Draft Policy 1- The Sustainable Growth Strategy

This draft policy identifies that identifies that over the Plan period from 2018-2038 provision will be made for a minimum of 49,492 homes.

Growth is distributed in line with the settlement hierarchy. Most of the housing, employment and infrastructure growth is focussed in the Strategic Growth Area, which includes the parish of Costessey (as part of Norwich's urban area). The principle of identifying the Norwich urban area as the focus for most of the identified housing growth is supported.

Draft Policy 5- Homes

The objective of providing self and custom build is generally supported. However, the proposed threshold (5% of plots on residential proposals of 40 dwellings or more) is questioned.

We object to the requirement of draft Policy 5 (Homes) to provide 5% of residential proposals of 40 dwellings on more as self and custom build. This would result in 40 dwellings being set aside for self and custom build unless a lack of need for such plots can be demonstrated or plots have been marketed for 12 months and have not been sold. If, as a very broad calculation, this calculation is applied to only the new allocations identified in the draft GNLP (10,704 homes), this would result in the provision of approximately 535 units self and custom build units.

No evidence has been provided to justify such an unmet need which would necessitate such a significant proportion of properties to be set aside. It is therefore considered that the requirement for 5% (over 40 units) is wholly unjustified. It is requested that the wording to draft Policy 5 is amended as follows:

“On residential developments where there is an evidenced need, the Council will seek a proportion of developable plots to be set aside for self and custom build. This will be subject to the need shown on the Council’s housing register and the viability of individual sites” ~~Except for flats, at least 5% of plots on residential proposals of 40 dwellings or more should 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.~~

These amendments will ensure that sufficient self and custom build plots are delivered without detrimentally affecting the deliverability of individual sites.

Summary

We would be grateful for confirmation that these representations have been received and registered as duly made. We trust this submission is clear and helpful, but should you have any questions in relation to the above and please do not hesitate to contact me.

Kind Regards

Jordan Langdon-Bates

Senior Land and Planning Manager

Appendix 1

Masterplan

