



Representations to the Regulation 19 Publication Greater Norwich Local Plan

For Rosconn Strategic Land

March 2021





1.0 Introduction

- 1.1. Rosconn Strategic Land (RSL) welcomes the opportunity to comment on the Greater Norwich Local Plan (GNLP) and having reviewed the document and its supporting evidence, provides comments below. RSL represents the owners of land to the south of Flowerpot Lane, Long Stratton who we have entered into a promotion agreement with in order to promote their land for residential development.
- 1.2. As is confirmed by the GNLP's evidence base, Land at Flowerpot Lane is a suitable and deliverable site for residential development. RSL believes that this site should be allocated through the GNLP as it provides an opportunity to meet a sizable proportion of housing need in a highly sustainable location as well as offering opportunities to deliver short and medium term community benefits to Long Stratton.
- 1.3. The following representations address Policies 1, 7.2, 7.4, the Sustainability Appraisal and certain policies of the Part 2 Plan. A separate Site Delivery Statement has been prepared for land to the south of Flowerpot Lane, Long Stratton which demonstrates with reference to the Plan's evidence base and other information, that this site is suitable, achievable and deliverable.

2.0 Policy 1: The Sustainable Growth Strategy

The Housing Requirement

- 2.1. Policy 1 identifies the need for around 40,550 new homes over the GNLP plan period (2018 to 2038). Paragraphs 176 and 177 of the supporting text clarify that this number is Greater Norwich's Local Housing Need (LHN), calculated using the standard methodology. Policy 1 also states that total provision is made for 49,492 homes through the Plan, but is made clear that this is not the benchmark against which housing land supply (or delivery) will be measured. Performance in both regards will instead be measured against the minimum LHN figure of 40,541, which is for all intents and purposes is the Plan's housing requirement.
- 2.2. The Planning Practice Guidance (PPG) is clear that the standard method only calculates the "minimum annual housing need figure" and that "It does not produce a housing requirement figure." (Paragraph: 002 Reference ID: 2a-002-20190220). The PPG further clarifies that changing economic circumstances or other factors might have an impact on demographic behaviour and there are situations where it is appropriate to consider



whether actual housing need is higher than the standard method indicates. These situations include but are not limited to growth strategies for the area where funding is in place to promote additional growth and where strategic infrastructure improvements are occurring that are likely to drive an increase in the homes needed locally (Paragraph: 010 Reference ID: 2a-010-20201216).

The Greater Norwich City Deal

- 2.3. The Greater Norwich City Deal concluded with the Government in 2013. This arrangement provides funding for significant infrastructure improvements within Greater Norwich and commits the Greater Norwich authorities to bringing forward 3,000 additional homes in addition to the Joint Core Strategy (JCS) target of 37,000 homes (equating to 40,000 homes overall) by 2026. MHCLG data states that between 2008 (the JCS base year) and 2019, there were 19,416 housing completions in Greater Norwich. Local monitoring data records a further 2,304 units delivered in 2019/2020 bringing total completions to 21,720.
- 2.4. In order to meet City Deal housing commitments by 2026, it's necessary to deliver a further 18,280 units or an annual average of 2,611 per year. However, as illustrated by the trajectory at Appendix 6 of the Plan, the GNLP will only deliver 15,611 completions to 2026 leaving a shortfall of some 2,669 homes against the City Deal target. We would note that the figure of 15,611 is based on the optimistic and unsupported supply-side projections provided at Appendix 6 of the Plan. We also note that housing delivery (as per para 179 of the Plan) will be assessed against a need-based target of 1,961 per annum across the remaining GNLP plan period. This approach could result in an even larger discrepancy between actual delivery and the City Deal target.
- 2.5. Paragraph 185 of the GNLP states that the GNLP builds in sufficient flexibility to support higher than trend economic growth, incorporating the City Deal. As such it is clear that taking account of City Deal ambitions remains an important element of the Plan. However, notwithstanding this, the GNLP demonstrates that it will not keep pace with the City Deal target for new homes in terms of its need or supply based targets.

Economic Trends & Infrastructure

- 2.6. The Employment Land Assessment Addendum (2020) by Avison Young records that the overall supply of employment land in Greater Norwich outstrips the objective need by nearly 4.5 times. It is fundamental to the Plan's economic strategy that key strategic employment sites contribute to the Cambridge/Norwich Tech Corridor, supporting the



globally significant axis between Cambridge University, the University of East Anglia (UEA) and Norwich Research Park. Likewise, significant infrastructure improvements are planned in the area such as two committed improvements to the A11 and A47 by Highways England in addition to Government-funded upgrades to several local non-trunk roads of national importance within the Greater Norwich area. Greater Norwich has also secured significant Government funding through the Transforming Cities Fund leading to further public transport infrastructure commitments in addition to the significant locally-led improvements to rail infrastructure that will occur within the GNLP plan period.

- 2.7. In light of the above, it is disappointing that the Councils' aspirations for nationally and internationally significant economic growth and committed infrastructure improvements have not been assessed in terms of how they will drive additional housing need over the plan period. It is already evident that the Plan's housing requirement falls considerably behind the baseline aspirational housing growth outlined in the City Deal.
- 2.8. Whilst we note the 22% supply buffer to "cater for future growth rates" (Table 6), paragraph 178 of the supporting text indicates that this buffer is driven by future-proofing the Plan against any upward adjustment in household projections and the Government's wider forthcoming reforms to the planning system. It is not to cater for any actual increased demand for new homes arising from above-trend economic and infrastructure growth itself. As set out above, the supply buffer does not result in the GNLP even keeping pace with City Deal targets. Similarly, key performance benchmarks in terms of housing supply and delivery will be based on the minimum LHN figure which undermines the effectiveness of the intention to deliver a quantum of growth over the minimum. RSL questions the extent to which this approach complements the Plan's strategic objectives of, for instance, supporting the expansion of internationally important knowledge-based industries (paragraph 151). Inadequate housing delivery to support such expansion will exert downward pressure on such aspirational growth.
- 2.9. **RSL considers that the housing requirement set out in the Plan should be greater than the minimum housing need figure, so that it is consistent with the NPPF's focus on significantly boosting the supply of housing and takes account of the above-trend economic growth and infrastructure improvements as set out within the GNLP and the Greater Norwich City Deal. It is also considered that the housing requirement within the Plan does not reflect government guidance in that it only proposes to meet the minimum starting point figure and no evidence has been**



provided to support why this decision has been made or why it is considered to be appropriate. RSL objects to Policy 1 on this basis.

Housing Supply & Delivery

2.10. RSL supports the overall purpose of the Delivery Statement in Section 4 which recognises the importance of inclusive growth and sustainable development, and more specifically the acknowledgment of the interrelationship between the delivery of housing, jobs and infrastructure.

2.11. RSL also generally supports the approach of only allocating housing sites where a “reasonable prospect of delivery,” taking account of policy requirements in the Plan, can be evidenced. However, there is no information within the Plan or its evidence base that analyses the deliverability of strategic sites and the timescales for these coming forward. Therefore the high-level trajectory presented at Appendix 6 to the Plan is not supported by appropriate evidence. Without such evidence, there can be no confidence that the GNLP will establish a five-year housing land supply on adoption in accordance with paragraph 67 a) of the National Planning Policy Framework (NPPF), which is a critical soundness test and one which representors to the Plan are unable to comment on in any meaningful way. In addition, paragraph 39 of the NPPF requires robust evidence of deliverability for those sites identified in the first five years of the Plan. The PPG elaborates further by stating that robust and up to date evidence needs to be available on housing delivery to support the preparation of strategic policies. As per Annex 2 of the NPPF, the PPG states that certain sites are considered to be deliverable in principle but other types of sites, such as those allocated and those that have outline planning permission for major development, require specific evidence to prove they are deliverable in both the plan-making and decision-taking contexts. No such evidence has been presented as part of the Regulation 19 Plan’s evidence base and RSL objects to this as it is prejudicial to those who wish to make representations on the soundness of the Plan in this regard.

2.12. Footnote 66 of the Plan states that the Councils have written to site promoters requesting evidence of deliverability yet this information is not being consulted on nor is it clear what role, if any, it has had in shaping assumptions about projected housing delivery over the plan period presented at Appendix 6. The approach taken of proposing to allocate/re-allocate strategic sites in advance of receiving the necessary evidence from site promoters undermines the Plan’s stated objective of only allocating sites where there is



a reasonable prospect of delivery. This relates to the test of developability, which is relevant, but the test of deliverability is also relevant within the first five years of the Plan and further evidence is required in relation to both tests for the Plan to be sound.

- 2.13. The Plan's lack of robust evidence to demonstrate the developability and deliverability of sites relied upon, particularly those within its first five years, renders it unsound for lack of effectiveness and compliance with national policy. Should such evidence be subsequently published it should be fully consulted on and RSL reserves its position in this regard.
- 2.14. In terms of the components of the Plan's supply, it is notable that approximately 74% of the total growth identified to 2038 is through existing "deliverable" commitments (paragraph 176). When expressed as a percentage of the housing requirement/housing need figure, committed housing sites plus delivery since the base date of the Plan account for 90% of all completions over the GNLP plan period. This committed growth arises from the 2011 Joint Core Strategy (JCS), alongside subsequent Site Allocations and Area Action Plans dating from 2014-2016.
- 2.15. It is not clear from the evidence provided to date what proportion of the commitments are on sites for which no planning permission has yet been secured despite being allocated for several years, but there is certainly some indication that not all historic allocations are likely to remain deliverable, particularly in the context of a more stringent definition of the term in the National Planning Policy Framework (NPPF). As set out above there is no substantive assessment either in the Plan itself or the evidence base as to the deliverability of the existing commitments that are being rolled forward from the JCS and other adopted plans nor is there any assessment of the GNLP's proposed allocations in this regard.
- 2.16. In reviewing the latest Annual Monitoring Report 2018-19, it is stated at paragraph 3.21 that despite recent successes, housing delivery overall within the Greater Norwich area has fallen 4,255 homes below the JCS target since the start of the JCS plan period, with the under delivery resulting in housing shortfalls in the Norwich Policy Area (NPA) that total 6,076 homes, with shortfalls particularly acute in the Broadland part of the NPA. It concludes by stating that it remains a significant challenge to achieve and sustain a level of delivery that would enable the JCS housing target to be met by 2026.



- 2.17. Furthermore, it is evident from Appendix 6 of the adopted JCS that as of the 2019/20 monitoring year, this adopted plan was meant to have delivered 25,944 new homes including windfalls, but as of 2019/2020 cumulative completions since 2008 sat at about 21,720. As such, the trajectory that underpinned the JCS over-estimated completions to date by about 20%. Without suitably robust deliverability information and assumptions on timing, the GNLP will likely fall into the same error and would therefore be unsound.
- 2.18. The shortfall in housing delivery against the JCS targets also applies to affordable housing. In a Decision Letter dated 11th November 2020, a S78 Inspector allowed an appeal in relation to the development of up to 170 dwellings at Land to the East of Memorial Hall, Brundall (reference 3239986). At paragraph 73, the Inspector stated that from the base date of the JCS until 2018/2019, Greater Norwich had delivered 4,471 affordable units against a requirement of 6,171 units resulting in a significant cumulative shortfall of 1,700 units. Not only does this illustrate the overoptimistic assumptions underpinning the adopted JCS, whose strategy the GNLP does not significantly change, but it suggests the need for a more comprehensive analysis of affordable housing needs and future delivery. However, other than the 2017 Strategic Housing Market Assessment, there is no up-to-date part of the evidence base where this has been considered.
- 2.19. RSL objects to Policy 1 on the basis that the Plan does not credibly establish a five year housing land supply contrary to the NPPF and PPG and that, contrary to the Plan's own stated approach, the deliverability and developability of projected housing completions, particularly those arising from strategic sites, has not been adequately considered – therefore not sound.**

The Settlement Hierarchy & Growth Strategy

- 2.20. Whilst RSL generally agrees with the proposed settlement hierarchy, there appears to be no explanation within Policy 1 or elsewhere, as to what the purpose of the hierarchy is or how this has been used to inform the distribution of growth. Whilst paragraph 191 confirms which settlements fall into which level of the hierarchy, there is no explanation as to what the role and function of each tier in the hierarchy is and how this has influenced the overall growth strategy.
- 2.21. There is similarly no explanation as to the role and function of the Strategic Growth Area (SGA). Whilst Policy 1 states that it is the settlement hierarchy that has guided the



distribution of growth, this appears to then be contradicted by the statement at paragraph 169 which suggests that the strategy is to direct 74% of the growth to the SGA. It is therefore unclear whether it is the settlement hierarchy or the SGA that have influenced the distribution of growth. The SGA on one hand and the settlement hierarchy on the other are mutually exclusive since key and highly sustainable settlements (such as Long Stratton) are not located in the SGA.

2.22. Policy 1 states that growth has been distributed in line with the settlement hierarchy to provide good access to services, employment and infrastructure. It states that most of the housing will be focused in the SGA, but in practice this means a significant and continued focus on Norwich and its fringe parishes, accounting for 66% of overall growth to 2038 compared to 74% across the wider SGA. The Norwich Urban Area (Norwich plus its fringe parishes) alone would see new allocations to provide 6,672 new homes on top of a commitment of 26,019 identified through existing plans.

2.23. The evidence referred to earlier has highlighted the real challenge to achieving the levels of growth identified for the Norwich Policy Area through the current JCS. To underscore this point still further, of the 6,672 new homes brought forward by the GNLP in the Norwich Urban Area through new allocations, 3,680 or 55% this growth will be within the established built-up area of Norwich itself (as opposed to the fringe parishes). Norwich City Council (to whose administrative boundaries the city's built-up area corresponds) has persistently struggled to demonstrate a five year supply of deliverable housing sites with even the very optimistic assessment in the latest available 2018/19 AMR putting five year housing land supply at 4.03 years. This track record also applies to housing delivery in Norwich, which has fallen below even JCS requirements for every monitoring year but one since 2014/15:

Table 1 Delivery within the Norwich Built-Up Area Against JCS and LHN Annual Targets

Monitoring Year	Actual Delivery	JCS Target	LHN Figure ¹
2014/15	249	477 (-228)	601 (-352)
2015/16	365	477 (-112)	601 (-236)
2016/17	445	477 (-32)	601 (-156)
2017/18	237	477(-240)	601 (-364)
2018/19	927	477 (+450)	601 (+326)
Cumulative Shortfall Since 2014/15:		-162	-782

¹ As at the April 2019 base date as per the latest available Greater Norwich AMR. Included for illustrative purposes only to compare past trends with current requirements.



- 2.24. Whilst it is acknowledged that the Councils propose that housing supply and delivery to be assessed on a Greater Norwich-wide basis, the Norwich built-up area's assumed contribution is wholly unrealistic having regard to previous trends, particularly against the more recent LHN figure. Directing further growth to this area must therefore raise concerns about whether this is an effective strategy. In addition, this strategy does not fulfil the objective of Policy 1 which highlights that growth will also be focused in towns to support vibrant rural communities. Greater Norwich's main towns (i.e. the second tier in the settlement hierarchy) will see comparatively limited growth, as much as 80% less than in Norwich and its fringe parishes.
- 2.25. The limitations of Norwich's fringe parishes in terms of accommodating net growth seem implicitly acknowledged by the Councils in that most fringe parishes (with the exceptions of Taverham, the "Growth Triangle" area and Colney) will accommodate no new growth through the GNLP. This has left a gap which has been plugged by directing net growth in the GNLP toward the Norwich built-up area which has resulted in a top-heavy strategy that lacks flexibility to respond to changing and indeed current circumstances, including the issue of inadequate housing supply and stalled housing delivery in the City of Norwich itself and affordable housing delivery shortfalls across the Plan Area more generally.
- 2.26. In summary, RSL objects to Policy 1 on the basis that further consideration should be given to directing a greater proportion of the residual housing requirement through new allocations towards the Main Towns and Key Service Centres, particularly those that are located outside the SGA, in order to enable the sustainability benefits of housing growth to be distributed more widely and fairly. Settlements such as Long Stratton and Aylsham for instance play a wider role in serving a principally rural hinterland and growth can assist in maintaining and enhancing services and facilities and delivery of affordable housing to meet local needs that these wider rural communities are reliant on. This approach would remain aligned with the preferred growth option of directing the majority of growth around the Norwich Urban Area and within the SGA, whilst allowing a greater level of dispersal to support thriving rural communities as well as flexibility. Such an approach will also be more deliverable than the current "all the eggs in one basket" approach where almost all of the growth is directed to the Norwich Urban Area / SGA with very little being directed to highly-sustainable settlements elsewhere within the plan area.**



3.0 Policy 7.2: The Main Towns

- 3.1. RSL wish to comment on Policy 7.2 and the associated text with specific reference to Long Stratton. It is notable that Long Stratton is the only Main Town to which no further growth will be apportioned in the GNLP. The justification provided for this is the “scale of existing commitments” at Long Stratton and the associated presence of an Area Action Plan (AAP) that allocates strategic development on the edge of the settlement as well as for the intention for the APP to remain in place post GNLP-adoption. This justification, however, is not convincing.
- 3.2. Firstly, there are a number of locations throughout Greater Norwich where the GNLP apportions significant growth on top of existing commitments – the Norwich built-up area and the Growth Triangle are both cases in point. The North East Growth Triangle development plan document will, in common with the Long Stratton AAP, not be superseded by the GNLP and will remain extant post-adoption. Despite this, the GNLP still directs 1,420 further homes to the Growth Triangle on top of the 12,087 home commitment already apportioned here through existing development plan documents.
- 3.3. Secondly and most significantly, Wymondham is, in common with Long Stratton, a Main Town with an adopted AAP that will remain in place post-GNLP adoption and which also allocates strategic growth resulting in a total committed development figure of 2,465. These are the exact same circumstances that have led the Councils to conclude that no new allocations should be made at Long Stratton yet two allocations are proposed in the GNLP at Wymondham for 150 homes. In fact, the level of committed growth (2,465) is materially higher in Wymondham than in Long Stratton (1,922) and so neither the level of committed growth nor the presence of an AAP can explain the GNLP’s approach to allocate further land at one settlement but not the other.
- 3.4. The Long Stratton Site Assessments Booklet states that Land South of Flowerpot Lane (GNLP4033 and GNLP4034) is a reasonable alternative and points to no significant technical constraints. Similarly, the Housing and Economic Land Availability Assessment (HELAA) considers the site to be suitable for development. The assessment of the reasonable alternative sites in the Sustainability Appraisal (SA) reinforces this conclusion. Thus, the only explanation for non-allocation of otherwise suitable sites at Long Stratton is that which has been given above. Such an explanation is not justified when one considers the decision to allocate further land at Wymondham



and indeed at all other Main Towns through the GNLP, as well as at other locations throughout the Plan Area that have already accommodated significant growth.

The Long Stratton Area Action Plan

- 3.5. The Long Stratton Area Action Plan (LSAAP) was adopted in 2016 and identified land for approximately 1,800 dwellings plus a new bypass. The LSAAP envisaged delivery of this growth by 2026 with no more than 250 dwellings occupied until the bypass is completed. The Councils intend that the LSAAP will remain extant post-GNLP adoption and level of committed growth identified within it is relied upon at least in part by the GNLP in terms of its overall housing provision, though it is impossible to say how much given there is no breakdown of how individual strategic commitments are expected to come forward over the remaining plan period.
- 3.6. RSL is concerned that there has been no substantive review of the LSAAP's strategy as part of formulating the GNLP nor is there any commitment in the GNLP to carrying out such a review. The LSAAP only runs to 2026, the end date of the current JCS, and even on adoption in May 2016 only covered a period of about 11 years, well below the 15-year minimum set out in the NPPF. Upon the GNLP's anticipated adoption date (September 2022), the LSAAP will have less than four years left to run before it becomes time-expired. The LSAAP will remain a product of the JCS, which by then will have been replaced, as well as the JCS's evidence base, thereby being over a decade old. In addition, the LSAAP's scope was very narrow with its purpose being to allocate sufficient land at Long Stratton to meet the JCS target for the settlement. Since the GNLP will supersede the JCS, it is necessary to consider whether the JCS strategy for Long Stratton continues to be justified and effective in light of the evidence. RSL's view is that it does not.
- 3.7. Funding for the bypass, as detailed within the LSAAP, is to be from a number of sources including developer contributions (S106/CIL). Clearly the development itself is unable to fully fund the cost of the bypass, particularly as it is to be completed in advance of the majority of housing being completed. As of late 2020, proposals were being developed for submission of an outline business case to the Department of Transport to facilitate delivery of the project. Of the total cost of £37.44m, 70% of this figure would require Government funding with the remainder made up from developer contributions. Construction is not currently anticipated to begin until mid-2023 and the bypass will not be open until the end of 2024 at the earliest.



- 3.8. In terms of the delivery of the 1,800 dwellings and associated bypass, two planning applications were made in January 2018 for the two principal elements of the overall development and the bypass. These applications, however, remain undetermined as they are the subject of a holding objection from Highways England (and have been since they were first submitted) in view of the potential implications of the wider development on the operation of the A47 trunk road and in particular its junction with the A140. Information from Norfolk County Council, which is working with the site promoters to bring forward the scheme, suggests that these planning applications will soon be abandoned and that revised proposals will be submitted further elongating the timescales.
- 3.9. As such, it is apparent that the strategic allocation at Long Stratton has been severely delayed, as has progress on delivering the bypass. It is therefore unlikely that any meaningful housing numbers will be delivered from these sites within the next 5 years and it is difficult to see more than 100 dwellings being delivered by 2026 compared with the 1,800 envisaged in the 2016 LSAAP. Furthermore, there is serious doubt about whether any meaningful development will be delivered from this site by 2038 and probably significantly less than has been assumed when determining commitments from this particular allocation. However, neither the GNLP nor the AMR 2018/19 provides sufficient detail to determine which sites will contribute towards the overall housing commitment identified within Policy 1.
- 3.10. The failure or at least significant delay in the delivery of the 1,800 homes plus infrastructure envisaged in the LSAAP will considerably undermine the ability of Long Stratton to grow in the short to medium term in order to meet housing and other local needs. For example, the LSAAP states that the settlement has an open space deficiency and identifies the need for a burial ground. Both deficiencies could be remedied in the short term through the allocation of suitable land for new development through the GNLP. This approach could also bring forward additional funding to address the substantial funding gap for the bypass, whilst making a meaningful contribution to the wider delivery of housing within the Greater Norwich area in a highly sustainable location that broadly aligns with the overall spatial strategy.
- 3.11. RSL objects to Policy 7.2 as it apports no additional growth to Long Stratton. This is unjustified as it is inconsistent with the approach taken to other locations in Greater Norwich with similar characteristics (e.g. Wymondham) where the**



GNLP has made new allocations. Furthermore, this choice has not been informed by a review of the JCS approach to Long Stratton to ensure that it remains justified and effective in light of the most up-to-date evidence and the considerable delays and challenges encountered to date with delivering the LSAAP's strategic allocation. Specific deliverable allocations should be made at Long Stratton to enable the settlement to grow sustainably in the short and medium term and contribute to meeting the need for new housing across Greater Norwich.

4.0 Policy 7.4: Village Clusters

- 4.1. Village Clusters occupy the lowest rung of the settlement hierarchy yet this area will accommodate significant growth to 2038 in the amount of 4,220 homes; 1,682 of which will be provided as new allocations through the GNLP (in the case of Broadland) as well as through the future "Village Clusters Housing Site Allocation Plan" (in the case of South Norfolk).
- 4.2. The GNLP's overall apportionment of 4,220 to the Village Clusters is significantly greater than the level of growth it apportions to the Key Service Centres (3,679), despite the Key Service Centres offering a more sustainable location for growth. Similarly, the net growth (excluding commitments) apportioned to the Village Clusters through the GNLP (1,682) is slightly higher than the net growth appropriated to the Main Towns (1,655). Again, this approach does not align with the settlement hierarchy in Policy 1.
- 4.3. Such an approach is inconsistent with the Plan's spatial strategy stated in Policy 1, which is to distribute growth in line with the settlement hierarchy to provide good access to services, employment and infrastructure. Whilst diversifying the sources of housing supply is a desirable aim given the high reliance on the Norwich Urban Area, directing significant growth to small rural settlements should be the least preferable option through which to do so when there are, according to the Councils' site assessment evidence, suitable sites elsewhere in more sustainable locations, such as at Long Stratton.
- 4.4. The GNLP states at paragraph 346 that Main Towns such as Long Stratton "play a vital role in the rural economy, providing employment opportunities and services for the wider hinterlands." Such a statement suggests that the needs of rural areas would be more sustainably met through additional growth at the Main Towns. In Village Clusters, it would be reasonable for development to be limited to that which is necessary to support rural or local needs.



- 4.5. RSL objects to Policy 7.4 as the current approach in the GNLP regarding the Village Clusters would not lead to a sustainable pattern of growth and would undermine the Plan's stated spatial strategy in Policy 1 to distribute growth according to the settlement hierarchy. Rather than directing significant growth to rural villages, the GNLP should allocate more land at the Main Towns at sites that have been judged to be both suitable and deliverable.**

5.0 The Sustainability Appraisal

- 5.1. RSL considers that the Sustainability Appraisal (SA) underpinning the Plan has not been carried out robustly and as a result the spatial strategy is unjustified and therefore unsound.
- 5.2. The Regulation 19 SA fails to explain adequately why the Plan's preferred spatial strategy was selected and how it performs against the reasonable alternatives for the distribution of growth. Rather than providing a clear narrative to enable the reader to determine how the Plan's preferred strategy and reasonable alternatives to it were shaped over time, the current SA refers to a number of previous reports published in previous stages of consultation.
- 5.3. The Regulation 19 SA Report explains that at the Regulation 18A stage in 2018 six spatial strategy options were identified (paragraph 5.41) based on the delivery of 7,200 dwellings but that no single option was selected as the preferred strategy (paragraph 5.4.3). No further SA work was carried out to inform the Regulation 18B stage.
- 5.4. Subsequently, the Regulation 18C stage SA identified a seventh spatial strategy (para 5.4.12) which was selected as the preferred one. This corresponded to the spatial strategy in the Regulation 18C draft of the GNLP and the current Regulation 19 draft of the GNLP.
- 5.5. Having reviewed the Regulation 18C draft of the SA, there is no explanation of how the preferred spatial strategy was arrived out or how it compares with the reasonable alternatives across the SA framework. It only tests the GNLP's preferred strategy (Policy 1) against the framework. In terms of alternatives, the document simply refers back to the Interim Sustainability Appraisal for the Regulation 18A stage which assessed the six original strategic growth options.



- 5.6. The Regulation 18A SA did not appraise the preferred spatial strategy and therefore did not explain how this performed better when compared to the other spatial options set out in that report. The spatial options in the Regulation 18A SA were tested on a different basis to the preferred strategy in that they were considered in relation to a different scale of net growth (7,200 versus 10,704 currently proposed in Policy 1 of the GNLP) and over a different plan period (2015 to 2036). Nowhere has the SA process considered, for instance, the reasonable alternatives to distributing the level of net growth that is currently identified in the GNLP.
- 5.7. The Regulation 18A SA assumed a baseline provision of 3,900 dwellings to various locations throughout Greater Norwich on the basis that there was no reasonable alternative to this. Hence only 3,300 dwellings were considered in terms of how the various spatial options were tested at the Regulation 18A stage. In RSL's view, a significantly greater quantity of net growth clearly raises implications for the alternatives of distributing it in terms of whether they remain "reasonable," how they perform against other options and how they compare to the preferred strategy.
- 5.8. In addition to not being considered in the same way, the reasonable alternatives and the preferred strategy have not been examined to the same level of detail or on a comparable basis against an up-to-date evidence base. Both the Regulation 18C and 19 SA reports carried out in 2020 and 2021 respectively appraise the preferred spatial strategy (Policy 1) in a considerable amount of detail with all the benefits of the most recent evidence while giving practically no attention to the reasonable alternatives to this spatial strategy identified at the Regulation 18A report.
- 5.9. The above has consequences for the appraisal of individual sites. For instance, all sites in Long Stratton that are reasonable alternatives have been rejected on the basis that they do not align with Policy 1's strategy. However, it is not clear how those sites could have played a part in an reasonable alternative to the preferred spatial strategy or how that strategy performs on a comparative basis to the preferred one. Whilst the SA process does not have to test every possible scenario for growth, paragraph 7.5.8 of the Regulation 18A SA report is clear that the approach to defining distributional options was, amongst other things, driven by the need to maintain and enhance the vitality of Main Towns and Villages. Paragraph 7.5.12. states that:

“...it is also critical that the vitality of Main Towns and Villages is maintained. In practical terms this means planning for new development in settlements where



there is an appropriate range of services and facilities to support a degree of sustainable development.”

- 5.10. In light of this it is difficult to say that there is no reasonable alternative to the strategy of no net growth at one of the Plan Area’s Main Towns (Long Stratton). All but one of the six original growth options apportioned growth to the Main Towns, though there was no definitive conclusion about how this would be distributed between individual settlements. There was a brief comment in the Regulation 18A SA about the scale of growth committed at Long Stratton being problematic in terms of accommodating further housing, but this reasoning is inconsistent when the scale of the existing commitment in settlement is lower than in Wymondham, which is to take further growth through the GNLP. In addition, the scale of net growth to be brought forward through the GNLP at this stage was considerably lower than what it is now. There has been no comparative appraisal of reasonable alternatives with the subsequent preferred approach to direct much of this sizable net growth to the South Norfolk villages (at the bottom end of the hierarchy) and the Norwich built-up area (at the top end of the hierarchy).
- 5.11. Finally, the SA approach to testing previously allocated sites is flawed, which is significant in light of the fact these make up a very high proportion of the planned housing supply. The Regulation 18A SA report only tested growth options in terms of the net growth to be allocated through the GNLP at the time (7,200) and simply assumed that all commitments would come forward to 2036 as per expectation.
- 5.12. Box 5.8 of the Regulation 19 SA Report explains that a number of existing allocations carried forward do not have outline planning permission but these “were treated as reasonable alternatives for consideration under the Sustainability Appraisal process, in the same way as new potential allocations that had been identified as reasonable alternatives.” However, carrying forward pre-existing allocations is not a “reasonable alternative” as the Council has suggested in Box 5.8, but the preferred strategy. Indeed, it is a key element preferred strategy and it seems that no reasonable alternatives to this strategy have been identified or appraised, despite the Regulation 19 SA report seeming to infer that this is necessary in the case of those allocated sites without planning permission.
- 5.13. Whilst it is true that individual reasonable alternative sites have been assessed, many have been discounted on the basis that they do not align with the preferred strategy. That is not in itself a flaw. But it becomes problematic in RSL’s view when there has



been no appraisal of reasonable alternatives to this preferred strategy or, alternatively, an explanation as to why there are no reasonable alternatives at all; in this case to the choice to roll forward unconsented allocations into the GNLP. Clearly, the identification of unallocated individual sites as reasonable alternatives indicates that there *are* reasonable alternatives to unconsented allocations, but it is far from clear why the latter have been chosen over the former with reference to the options for distributing growth and the relative performance of these.

- 5.14. **Given the above, RSL considers the spatial strategy of the GNLP to be unsound for want of justification as it has not been underpinned by a sufficiently robust SA process. Reasonable alternatives to the preferred spatial strategy have not been adequately appraised in the same detail or on the same basis.**

6.0 Part 2: Sites Plan

- 6.1. In respect of Long Stratton, RSL wish to object to the fact that no allocations are proposed within the Part 2 Sites Plan for the settlement. The Part 2 Sites Plan sets out the rationale for this approach but does not add any further explanation to that already provided the Part 1 Plan. Hence RSL's reasoning for its objection to this approach is set out with reference to our representations on the Part 1 Plan.
- 6.2. RSL's comments on other elements of the Part 2 Plan are set out below.

The East Norwich Strategic Regeneration Area (ENSRA)

- 6.3. As per Policy 7.1 of the Part 1 Plan, the Councils expect the ENSRA to deliver 4,000 units to 2038. This represents a sizable net addition to the already substantial commitments in the Norwich built-up area and there is no evidence that indicates the ENSRA will realistically yield this level of development within the GNLP plan period.
- 6.4. The ENSRA as a whole consists of previously-developed industrial sites adjacent to two rivers. Much of the area is within flood zones 2 and 3. There is a need for substantial new transportation infrastructure including a new bridge, an integrated masterplan and an associated supplementary planning document. It is understandable therefore that this site is stated as having the medium to long-term potential to deliver a new urban quarter. However, in light of the commentary concerning the need for significant transport improvements and flood risk mitigation, it is clear that delivery of the ENSRA leans



toward the long-term as it is far from certain that it will deliver even close to the anticipated level of development within the GNLP plan period.

- 6.5. In specific regards to flood risk, it is notable that the Level 2 Strategic Flood Risk Assessment supporting the GNLP by JBA Consulting states the following of the ENSRA:

“Major reprofiling, flood defences and sustainable drainage work would be required to bring forward such a high flood risk site. This will again involve sacrificing some areas as functional floodplain and increasing flood storage to allow other areas of the site to be defended against fluvial flooding. This is likely to affect the amount of land available for development. Areas of functional floodplain should be safeguarded from future development but may be appropriate for green infrastructure and open space uses.” (Page v) [Emphasis added]

- 6.6. It is unclear how this information has been used to calculate the broad capacity of the ENSRA . Furthermore, It is unclear from the SFRA how the allocation of a site with such significant flood risk issues sits against the sequential approach in the National Planning Policy Framework, which states that sites in lesser areas of flood risk should be allocated for development over those in higher risk areas. Whilst the Level 2 SFRA deals with the sequential test on a theoretical level (by explaining what it is and how it should be applied), there is no detailed explanation as to how it actually has been applied in this case. It is of course possible to avoid and mitigate flood risk within sites once allocated for development, but this should only be considered once the sequential test has been passed.
- 6.7. Finally, an allocation with such significant infrastructure requirements and constraints to address must raise important viability considerations. Whilst viability has been addressed in a generic way through the Viability Appraisal by NPS Group (dated 15th December 2020), this does not capture the site specific nuances of a sizable brownfield regeneration opportunity within an area of high flood risk. The NPS report is clear that the typologies assessed in the appraisal **“Do not account for any site specific or potential onerous costs such as poor ground conditions and flood risk areas/zones.”** Both will clearly be significant issues in the case of the ENSRA. Whilst it is noted that the NPS report states that strategic sites will be appraised independently, no part of the GNLP’s evidence base appears to have undertaken this exercise. Given



the plan-led viability approach expected in the NPPF and PPG, this is a shortcoming that undermines the effectiveness and justification behind the ENSRA allocation.

- 6.8. **For these reasons, RSL considers the ENSRA allocation to be unsound for want of compliance with national policy, justification and effectiveness. It is very unlikely that this site will deliver even close the anticipated quantum of development within the plan period thereby leaving a considerable hole in the GNLP's strategy. The ENSRA should be identified as a longer-term growth aspiration that will start to yield dwellings beyond 2038 and alternative suitable sites should be allocated to make up the shortfall.**

Land off Bawburgh Lane, North of New Road and East of the A47 (Costessey)

- 6.9. The Part 2 Plan identifies a 62ha contingency site at Costessey with an estimated capacity of about 800 dwellings. Whilst RSL supports the general principle of identifying contingency sites, identifying one at this scale and in this location is self-defeating. Contingency sites must be capable of coming forward quickly to shore up housing supply and delivery. In this case, that is even more critical since the trigger for the site coming forward is three consecutive years of housing delivery falling 15% or below annual targets. At this point, there could be a considerable cumulative shortfall and the need to wait at least another three years before a site at this scale starts to deliver new homes.
- 6.10. The Costessey reserve site lies within the Norwich Urban Area where there is a significant amount of committed housing development in addition to the new the GNLP allocations within Norwich and its fringe. Such a scale of existing commitments must raise questions about market absorption given the significant growth already planned for in this area. To enable delivery of the reserve site at Costessey, the Part 2 Plan references the need for the provision of off-site highway improvements and land for the provision of a new primary school/sixth form college. This need to secure education capacity and highways improvements would likely add further delay to the site coming forward.
- 6.11. In addition to the above, the Greater Norwich Local Plan Infrastructure Needs Report (2020) indicates that the power substation serving Costessey requires upgrading. It states that the traditional approach to such upgrades could cost up to £10 million and take several years to commence. Whilst the Infrastructure Needs Report discusses theoretical alternatives to this solution, there is no clear strategy for how offsetting the



need for significant network upgrades would occur. Once again, this could significantly affect the speed at which the Costessey contingency site could come forward.

6.12. RSL considers that more deliverable contingency sites should be identified in the GNLP to offset the risk of under-delivery and to provide the flexibility to respond to changing circumstances. For the reasons discussed above, provision of a reserve site at Costessey at the scale proposed would not perform this function.