

The Greater Norwich Local Plan  
**Pre-Submission (Regulation 19) Consultation**  
**March 2021**



**March 2021**

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# 1 INTRODUCTION

## 1.1 Context

- 1.1.1 Gladman Developments Ltd (Gladman) welcomes the opportunity to comment on the Greater Norwich Local Plan (GNLP). This representation provides Gladman's comments made in response to the current consultation regarding the Regulation 19 draft version of the GNLP. This document addresses the strategic development needs for Norwich City Council, South Norfolk District Council and Broadland District Council.
- 1.1.2 Gladman specialises in the promotion of strategic land for residential development and associated community infrastructure and has considerable experience in the development industry. From that experience, we understand the need for the planning system to provide the homes and jobs that are required to meet the Government's objectives and the needs of local communities.
- 1.1.3 Gladman also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Examinations in Public.
- 1.1.4 Gladman submits that the Greater Norwich Development Partnership (GNDP) will need to carefully consider its policy choices and ensure that its proposed approach positively responds to the revised National Planning Policy Framework (2019). There will also be a need to take consideration of changing circumstances associated with national planning policy and guidance over the course of the plan preparation period, including the Government's emerging proposals for the planning system, as set out in the Ministry for Housing, Communities and Local Government (MHCLG) consultations on "Changes to the Current Planning System, August 2020" and "Planning for the Future, August 2020".
- 1.1.5 Gladman is promoting a number of land interests across the Greater Norwich plan area at Wymondham, Diss and Poringland. Individual submissions are made in respect of these interests within this document and a Vision Document in respect of Land at Norwich Common, Wymondham is provided under separate cover.
- 1.1.6 Gladman wishes to participate at the examination of the Greater Norwich Local Plan. It is requested that we are provided with the opportunity to discuss issues raised in these representations further at the relevant Examination hearings that will follow the submission of the Plan to the Secretary of State.



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## 2 LEGAL COMPLIANCE

### 2.1 Duty to Cooperate

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 2.1.2 Whilst Gladman recognises that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, the GNDP must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3 The revised Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The revised Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process<sup>1</sup>. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.
- 2.1.4 It is noted that in Norfolk there is a strong history of cross-boundary cooperation and engagement. This exists locally with the production of the Joint Core Strategy and now the

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<sup>1</sup> PPG Reference ID: 61-001-20180913

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GNLP, the Norfolk Spatial Planning Framework, and work associated with the Anglia LEP. It will be important, in order to meet legal requirements and the tests of soundness, that this cross-boundary engagement continues through remaining stages of plan preparation, with evidence of ongoing working and mechanisms for this to continue beyond adoption of the GNLP.

- 2.1.5 The Norfolk Strategic Planning Framework – Shared Spatial Objectives for a Growing County and Statement of Common Ground is included within the GNLP evidence base. This document relates to the whole of Norfolk, covering all Norfolk authorities and is dated June 2019. Gladman notes that this document will be almost two years old by the time the GNLP is submitted to the Secretary of State for independent examination and submits that an update to this document may be required.

## 2.2 Sustainability Appraisal

- 2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2 The GNDP should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the GNDP's decision-making and scoring should be robust, justified and transparent.
- 2.2.3 The SA must demonstrate that a comprehensive testing of options has been undertaken and that it provides evidence and reasoning as to why any reasonable alternatives identified have not been pursued. A failure to adequately give reasons in the SA could lead to a challenge of the Council's position through the examination process. The SA should inform plan making. Whilst exercising planning judgement on the results of the SA in the Local Plan is expected, the SA should still clearly assess any reasonable alternatives and articulate the results of any such assessment.

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## 3 NATIONAL PLANNING POLICY

### 3.1 National Planning Policy Framework

3.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework (the Framework) which was subsequently updated in February 2019. These publications form the first revisions of the Framework since 2012 and implement changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

3.1.2 The revised Framework (2019) introduces a number of major changes to national policy and provides further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirm the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 16 of the Revised Framework (2019) states that Plans should:

***"a) Be prepared with the objective of contributing to the achievement of sustainable development;***

***b) Be prepared positively, in a way that is aspirational but deliverable;***

***c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;***

***d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;***

***e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and***

***f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."***

3.1.3 The revised Framework 2019 sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

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- **Positively Prepared** – the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
  - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
  - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
  - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

3.1.4 To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.

3.1.5 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.

3.1.6 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. It states:

***“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:***

***a) specific, deliverable sites for years one to five of the plan period; and***

***b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”***

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- 3.1.7 Annex 2 of the Framework (2019) provides updated definitions for the terms “deliverable” and “developable”. These are defined as:

***‘To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:***

***a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).***

***b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.’***

***‘To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.’***

- 3.1.8 Once a local planning authority has identified its housing needs, these needs should be met as a **minimum**, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to AONB or Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2019).

## 3.2 Planning Practice Guidance

- 3.2.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.

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3.2.2 The Standard Method was introduced by the Government to simplify the process of defining housing need, and avoid significant delay and debate experienced in plan preparation and at planning appeals.

3.2.3 Revisions to the PPG on the 20<sup>th</sup> February 2019 confirmed the need for local planning authorities to use the 2014-household projections as the starting point for the assessment of housing need under the standard method<sup>2</sup>.

3.2.4 It is clear in both the NPPF and PPG that the Standard Method forms only the minimum level of housing need for a local authority area. PPG also sets out that there will be circumstances where the housing requirement could be increased to a level which is higher than that identified through the application of the Standard Method. These circumstances include (but are not limited to):

- Where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding to promote and facilitate growth (e.g. housing deals);
- Where strategic infrastructure improvements are planned that would support new homes;
- Where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground;
- Previous delivery levels, where these have exceeded the minimum figure identified; and Recent assessments of need, such as a SHMA, where these suggest higher levels of need.

3.2.5 Whilst the Standard Method provides the Government's preferred approach to defining the minimum level of housing need for each local planning authority, alternative approaches may be applied where justified by exceptional circumstances.

### 3.3 Planning for the Future – White Paper

3.3.1 On the 6<sup>th</sup> August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.

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<sup>2</sup> PPG Ref ID: 2a-004-20190220 and 2a-005-20190220

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- 3.3.2 This consultation regarding these proposals closed on the 29<sup>th</sup> October. It will be important that the GNDP keeps abreast with the implementation of these changes to determine any potential implications for the GNLP.
- 3.3.3 Timescales remain uncertain, however subject to the outcomes of this process the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes.
- 3.3.4 A further consultation on immediate changes to the current planning system closed on 01 October 2020<sup>3</sup>. Of significant note is a proposed revised standard method for calculating local housing need, which proposed to incorporate a percentage of existing stock as the baseline of the calculation.
- 3.3.5 In December 2020 the Government published its response to the ‘Changes to the Current Planning System’<sup>4</sup>. This document provides an overview of the consultation responses before highlighting that it has been deemed that the most appropriate approach is to retain the Standard Method in the current form with an additional 35% uplift to the ‘post-cap number’ for 20 local authorities. The Government’s rationale behind this approach is to increase home-building in existing urban areas to make the most of previously developed brownfield land over and above that in the existing standard method.
- 3.3.6 The latest correspondence from Government regarding the revisions to the Standard Method for calculating local housing need will not affect the minimum local housing need which the GNLP should plan for. Nonetheless, it is vital that the GNDP keeps in touch with the implementation of changes deriving from the White Paper consultation to determine any potential implications for the GNLP.

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<sup>3</sup> Ministry of Housing, Communities & Local Government: Changes to the Current Planning System Consultation <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

<sup>4</sup> Ministry of Housing, Communities and Local Government. Consultation outcome: Government response to the local housing need proposals in “Changes to the current planning system” (December 2020)

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## 4 GNLP REGULATION 19 CONSULTATION PART 1 – THE STRATEGY

### 4.1 Background

- 4.1.1 The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011 with amendments relating to housing and employment growth in Broadland, adopted in January 2014. The Joint Core Strategy sets out the vision, objectives, spatial strategy and core policies to guide development across the three authorities through to 2026.
- 4.1.2 In addition to the Joint Core Strategy, South Norfolk's Local Plan includes the Site Specific Allocations and Policies Document which was adopted in October 2015 and the Development Management Policies Document, adopted in October 2015. The South Norfolk Local Plan also includes two Area Action Plans. The Wymondham Area Action Plan (WAAP) was adopted in October 2015 and the Long Stratton Area Action Plan was adopted in May 2016.
- 4.1.3 As well as the Joint Core Strategy, Broadland's Local Plan also includes the Development Management DPD, adopted in August 2015 and the Site Allocations DPD which was adopted in May 2016. In July 2016 Broadland District Council adopted the Growth Triangle Area Action Plan which specifically applied to the areas of Old Catton, Rackheath, Sprowston, Thorpe St Andrew and other parishes that are not covered by the Site Allocations DPD.
- 4.1.4 Norwich City Council's Local Plan consists of the JCS as well as the Site Allocations and Site Specific Policies DPD and the Development Management Policies DPD, both adopted in December 2014.
- 4.1.5 The three councils have a history of working together to establish plans for the Greater Norwich area. Work towards the GNLP to guide future development across the region to 2038 commenced in 2016 with a Call for Sites taking place between May and July 2016. The GNLP will replace the current Joint Core Strategy and the Site Allocations Plans in each of the three districts, except for the smaller villages in South Norfolk that will be addressed through a future South Norfolk Village Clusters Housing Allocations Local Plan and the Diss, Scole and Burston area, where a Neighbourhood Plan is being produced which will allocate sites.
- 4.1.6 The GNLP will not replace the existing Area Action Plans for Wymondham, Long Stratton or the Growth Triangle, nor will the GNLP supersede the three adopted Development Management DPDs.



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4.1.7 The sections that follow below include specific comments from Gladman on the GNDP's Regulation 19 Local Plan set out against the first part of the plan, the GNLP Strategy, and then the second part of the plan, the GNLP Sites.

## 4.2 Policy 1 – The Growth Strategy

4.2.1 As discussed in Section 3, the local housing needs assessment conducted using the Standard Method set out in national planning guidance forms only the **minimum** level of housing need for a local authority and does not establish a housing requirement figure<sup>5 6</sup>.

4.2.2 Using the Government's standard methodology for identifying local housing need, based on the 2014 household projections, the GNLP's housing requirement for the period 2018-2038 is 40,541.

4.2.3 Nonetheless, the standard method does not account for changing economic circumstances, government policies or other issues that may affect demographic behaviour. In this instance, national planning policy does highlight circumstances whereby additional housing growth above the figure indicated by the standard method may be appropriate, including:

- *"growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground."*<sup>7</sup>

4.2.4 It is vital that the Plan considers economic growth when assessing the local housing need and considers if it is appropriate to set a higher housing requirement than indicated by the standard method to support economic growth ambitions<sup>8</sup>. Further to this, the Greater Norwich City Deal was signed with Government in December 2013 which aimed to create an additional 19,000 jobs and 3,000 homes. In order to support the enhanced growth potential, it is vital that the GNLP plans for a sufficient number of new homes.

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<sup>5</sup> NPPF (2019) Paragraph 60

<sup>6</sup> Planning Practice Guidance Paragraph: 002 Reference ID: 2a-002-20190220

<sup>7</sup> Planning Practice Guidance Paragraph: 010 Reference ID: 2a-010-20190220

<sup>8</sup> Planning Practice Guidance: Paragraph: 010 Reference ID: 2a-010-20190220

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- 4.2.5 Additionally, the Government has highlighted the long-term role the planning system and housebuilding has to play in the economic recovery from the COVID-19 pandemic, locally and nationally<sup>9</sup>. In this way, Gladman encourages the GNLP to fully consider the merits of planning for a housing figure beyond the minimum requirement of 2,027 dwellings per annum. For instance, an increased housing figure would enable the Greater Norwich authorities to capture a larger proportion of the £7 billion yearly housebuilder contributions<sup>10</sup>. With 218,000 homes predicted not to be built due to COVID-19 from now to 2024/25<sup>11</sup>, it is also imperative that the GNLP identifies sufficient land to support the delivery of homes.
- 4.2.6 In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. In this regard, Gladman supports the Home Builders Federation's recommendation that local plans should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.
- 4.2.7 Table 6 sets out the GNLP's total housing potential between 2018 and 2038 which establishes that the GNLP has the potential to provide a buffer of 22% over its housing requirement. Gladman acknowledges and supports the GNLP in its provision of a 22% buffer above the local housing need figure but questions whether the buffer is sufficient after taking into consideration the additional housing needs of Norwich due to the signed City Deal. Any homes which are included in the figures to meet the need of the greater growth aspirations should not be included within the buffer. If the result of removing this additional need from the current 22% buffer resulted in a buffer of below 20%, then further sites should be allocated.
- 4.2.8 Gladman notes that 74% of the growth expected to come forward over the plan period to 2038 is from completions since the start of the plan period in 2018, permitted sites and existing allocations and commitments from the Site Allocations Plans, Area Action Plans for Wymondham, Long Stratton and the Growth Triangle and Neighbourhood Plans. Gladman acknowledges that a proportion of these sites already benefit from planning permission however raise concern over the deliverability of these sites.

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<sup>9</sup> Press Release. PM: A New Deal for Britain <https://www.gov.uk/government/news/pm-a-new-deal-for-britain>

<sup>10</sup> MHCLG (2020). 'Planning for the Future'. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907647/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf)

<sup>11</sup> Shelter & Savills (2020). 'Over 80,000 new homes will be lost in one year due to COVID chaos'. Available at: [https://england.shelter.org.uk/media/press\\_releases/articles/over\\_80,000\\_new\\_homes\\_will\\_be\\_lost\\_in\\_one\\_year\\_to\\_covid\\_chaos](https://england.shelter.org.uk/media/press_releases/articles/over_80,000_new_homes_will_be_lost_in_one_year_to_covid_chaos)

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- 4.2.9 Gladman has specific concerns that the levels of housing proposed will not be delivered on these existing allocations, many of which have been allocated for over five years and have not come forward to date. Gladman questions whether any further analysis or evidence has been provided to understand why these sites have not delivered and to demonstrate clearly that these sites will realistically be delivered within the plan period to 2038.
- 4.2.10 In order to achieve the figure of 31,452 dwellings coming from existing commitments, the GNLP is reliant upon an uplift of the housing density on the existing allocated sites. Gladman questions whether this approach is realistic or feasible. It appears to be an uncertain strategy to assume densities will increase on allocated sites and any uplift needs to be fully supported by evidence that there is a realistic chance that the uplifted quantum of development is achievable on the site. It is important to consider the implications Covid-19 has had on the demand on certain types of properties. A recent Savills Survey<sup>12</sup> found that 39% of under 50s now want a bigger home with greater importance being put on more outdoor space. With this in mind, Gladman questions if it is realistic to assume that an uplift in the density of existing allocations can be achieved and suggests a more appropriate strategy would be to allocate further sites to ensure that a sufficient buffer is available.

### **Settlement Hierarchy**

- 4.2.11 Table 7 sets out Policy 1's settlement hierarchy. The hierarchy comprises four tiers to support a proportionate amount of growth according to the size and role of the settlement.
- 4.2.12 Gladman is supportive of the settlement hierarchy and particularly the identification of Diss and Wymondham as Main Towns. Table 7 shows that the growth in this tier of the hierarchy is 6,806 additional dwellings up to 2038. The amount of growth allocated to the Norwich Urban Fringe is 32,691 dwellings to 2038. Gladman submits that there is a risk to the delivery of the sites identified on the Norwich Urban Fringe due to issues such as market saturation. Gladman also questions whether the uplift to the assumed densities on sites in this location are realistic and achievable.
- 4.2.13 Gladman submits that further growth should be allocated to the Main Towns to ensure the housing need figure is delivered and to allow for greater flexibility. Offering a wider variety of sites to the market in varied locations across the Greater Norwich area will provide greater

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<sup>12</sup> Savills (2020) 'Covid-19 will reshape what prime UK home buyers and sellers want' <https://www.savills.co.uk/insight-and-opinion/savills-news/299736/covid-19-will-reshape-what-prime-uk-home-buyers-and-sellers-want>

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certainty that the housing requirement will be met. Gladman's submissions in respect of the growth strategy are provided in more detail below under Policy 7 – Strategy for Areas of Growth.

### 4.3 Policy 2 – Sustainable Communities

- 4.3.1 This policy seeks to ensure that the design of development is of high quality, contributes to the establishment and maintenance of resilient and inclusive communities, promotes low carbon development and helps to address climate change. Table 8 sets out the key issues addressed by Policy 2, which include access to services and facilities, new technologies, green infrastructure, densities, local character, travel, inclusive and safe communities, resource efficiency and pollution, water and energy.

#### **Densities**

- 4.3.2 Gladman supports the principle of developments making effective use of land and that densities should be dependent upon on-site characteristics with higher densities in the most sustainable locations. The policy stipulates that indicative minimum net densities are 25 dwellings per hectare across the plan area and 40 in Norwich. Gladman submits that higher densities applied to the proposed allocations should be applied with caution unless specific evidence has been provided from the developer, landowner or promoter to support delivery. If the higher densities are not achieved on the draft allocations, there is a risk to the delivery of the strategy within the GNLP.

### 4.4 Policy 5 – Homes

#### Affordable Housing

- 4.4.1 Policy 5 sets out that major residential development proposals of ten dwellings or more 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%. Gladman supports the principle of improving affordability across Greater Norwich and the need to identify an appropriate affordable housing target for differing built environments that reflects the local circumstances.
- 4.4.2 Notwithstanding the above support, the Councils will need to be able to demonstrate through clear, robust, up-to-date viability assessment that the provision of affordable housing in line with the proposed policy is viable on the majority of schemes.

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4.4.3 Gladman supports the element of flexibility within the draft policy allowing viability assessments to be submitted in respect of brownfield sites in particular circumstances. To confirm, the sites which are being promoted by Gladman for inclusion within the plan can all provide a policy compliant level of affordable housing, if not greater for example Poringland offers 36% affordable housing.

*Accessible and Specialist Housing*

4.4.4 The policy states that development proposals providing specialist housing options for older people's accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use.

4.4.5 Gladman is supportive of this policy approach as the provision of specialist housing to meet the needs of older people is of increasing importance.

4.4.6 Specialist housing with care for older people is a type of housing which provides choice to adults with varying care needs and enables them to live as independently as possible in their own self-contained homes, where people are able to access high quality, flexible support and care services on site to suit their individual needs (including dementia care). Such schemes differ from traditional sheltered/retirement accommodation schemes and should provide internally accessible communal facilities including a residents' lounge, library, dining room, guest suite, quiet lounge, IT suite, assisted bathroom, internal buggy store and changing facilities, reception and care manager's office and staff facilities.

*Self/Custom Build*

4.4.7 The policy states that with the exception of 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 can be demonstrated or plots have been marketed for 12 months and have not been sold.

4.4.8 Gladman objects to the inclusion of a fixed percentage requirement in relation to the provision of serviced self-build plots.

4.4.9 Whilst recognising the role attributed towards self-build in national planning policy as a source of housing land supply, we do not consider the inclusion of a requirement for all housing schemes over 40 dwellings to commit to onsite provision forms the most effective approach of responding to this source of housing need.

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- 4.4.10 Gladman believes that those wishing to bring forward a self-build or custom build house are unlikely to wish to do this alongside a large-scale housing development. Consequently, rather than including a strict requirement for this provision Gladman would recommend the policy encourages the consideration of the provision of self-build plots in locations where the demand exists.
- 4.4.11 Gladman would prefer to see policy which seeks self-build plots being considered on an ad hoc basis as windfall rather than as a percentage requirement of larger development schemes. We consider this approach to be more in line with the wants and needs for the individuals seeking the plot and the developer's requirements for larger sites.
- 4.4.12 Should a percentage approach be taken forward, the requirement should be supported by clear and robust evidence of this source of housing need. Gladman recommends that any policy requirement in relation to self-build housing has an element of flexibility built in to allow for negotiation over self-build plots on the basis of viability to ensure that site delivery is not delayed or prevented from coming forward. Any specific requirement to include self-build plots should be tested through the Council's viability assessment of the Local Plan policies to ensure that the cumulative impacts of all proposed local standards and policy requirements do not put the implementation of the Plan as a whole at risk.
- 4.4.13 Gladman notes that the proposed policy does include a mechanism which allows developers the opportunity after 12 months to either continue to market the plots for self-build or to revert back to them being delivered as part of the wider market housing scheme. Gladman supports the inclusion of this policy mechanism as it is necessary to ensure that housing land is not unnecessarily prevented from being brought forward. This helps to provide flexibility and helps to ensure that the required housing is delivered. If there is genuine demand for self-build housing it is likely that these plots would be brought forward relatively quickly.
- 4.4.14 Policy 6 – The Economy (including Retail) Policy 6 sets out the strategy for delivering economic growth over the plan period in accordance with the New Anglia LEP's Norfolk and Suffolk Economic Strategy and Local Industrial Strategy, the Cambridge Norwich Tech Corridor initiative, and the enhanced growth outlined in the Greater Norwich City Deal. Gladman is supportive of the ambitious economic growth strategy, however the GNDB should recognise the role housing delivery has in supporting sustainable economic growth, particularly in supporting town centres. There is a need to ensure that the proposed level of allocations made through the GNLP maximises economic growth potential provided through the City Deal and the A11 Norwich to Cambridge Tech Corridor. It is both appropriate and sound to concentrate
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new development towards this broad strategic location. However, as advised in our previous representations, the implementation of this strategy should not come at the cost of maintaining the sustainability and important role played by settlements which fall outside this corridor. It is important that sufficient development is directed to these settlements to support their longer-term sustainability and functionality. Opportunities should also be taken to focus growth towards those settlements which are well served by public transport to support climate change objectives.

## 4.5 Policy 7 – Strategy for the Areas of Growth

4.5.1 Policy 7 provides the backing for the distribution of the growth as set out in Policy 1 and the settlement hierarchy.

### **Policy 7.1 – The Norwich urban area including the fringe parishes**

4.5.2 A total of 32,691 homes are to be delivered in Norwich and the surrounding parishes accounting for 66% of the overall growth for the GNLP area.

4.5.3 Gladman support the identification of Norwich as the most sustainable location for growth however they consider that there are deliverability concerns regarding the quantum of development which has been directed to Norwich. Out of a total commitment of 32,691 new homes at the Norwich Urban Area, 79%, or 26,019 homes are expected to be delivered on existing commitments and allocations.

4.5.4 Of particular note is the GNLP's over reliance on The Growth Triangle which is expected to deliver 13,507 homes within the plan period. Gladman question whether it is realistic to assume that this quantum of development could come forward within the plan period to 2038 due to concerns over market saturation and market interest from developers.

4.5.5 The East Norwich Strategic Regeneration Area was identified in the March 2020 Regulation 18 Draft GNLP as having an existing deliverable commitment of 780 dwellings and a total deliverable commitment of 2,000 dwellings following the allocation of a further 1,220 dwellings. The Regulation 19 GNLP establishes a total deliverable commitment of 4,000 homes for the East Norwich Strategic Regeneration Area. Gladman accept that the Deal Ground has increased in size however sufficient evidence must be supplied to demonstrate that the capacity for the area has the ability to increase by 2,000 dwellings.

4.5.6 Gladman support regeneration however realistic timeframes have to be considered when projecting completions from such sites. The supporting policy text in the Regulation 19 GNLP

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states that further land is yet to be acquired. Given that land within the area is still to be acquired, in addition to the associated costs and remediation works associated with brownfield development, Gladman consider that there could be significant delays to delivery on this site.

4.5.7 As considered before, Covid-19 has changed home buyers' priorities with a recent Savills survey<sup>13</sup> finding that 71% of younger buyers crave more outdoor space and rural locations. With this in mind Gladman would also question whether the demand exists for 4,000 dwellings in this location.

4.5.8 Taking this uncertainty over demand for urban dwellings into consideration, it seems logical that further allocations should be located at the Main Towns.

### **Policy 7.2 – The Main Towns**

4.5.9 Gladman on the whole is supportive of Policy 7.2 which distributes growth to the Main Towns of the Greater Norwich Area, recognising the need for these locations to accommodate growth and support the wider aims of the urban area.

4.5.10 The sustainability and suitability of both Diss and Wymondham as locations for further development is welcomed by Gladman. It is considered that the allocations made at both settlements through the Local Plan however is insufficient.

#### Wymondham

4.5.11 Wymondham is identified within the GNLP as a Main Town and has good transport links, including mainline rail services to Norwich, Cambridge and Stansted Airport. Wymondham is the main town serving the south-west of Greater Norwich and has potential to contribute to the development of the Cambridge Norwich Tech Corridor<sup>14</sup>. Wymondham is located at the heart of the A11 Cambridge to Norwich Tech corridor meaning that the town should play an important role in fulfilling this economic potential over the plan period with further employment and housing land required. Despite its location, the GNLP only proposes to allocate 150 new homes to the Main Town of Wymondham.

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<sup>13</sup> Savills (2020) 'Covid-19 will reshape what prime UK home buyers and sellers want' <https://www.savills.co.uk/insight-and-opinion/savills-news/299736/covid-19-will-reshape-what-prime-uk-home-buyers-and-sellers-want>

<sup>14</sup> As set out at Paragraph 367 of the GNLP Regulation 19



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- 4.5.12 The Regulation 18 Draft GNLP included the potential provision of a contingency site around Wymondham for the delivery of up to 1,000 dwellings. Gladman note that the regulation 19 GNLP has removed the reference to a potential contingency site around the edge of Wymondham without providing justification for its removal.
- 4.5.13 Given previous comments made above relating to the quantum of development proposed to come forward in and around the Norwich Urban Area, Gladman question the inclusion of a contingency site around Costessey as opposed to Wymondham. If the market is failing to deliver homes around the edge of Norwich, providing further land for residential development in the same location will not solve the matter. Taking this into consideration Gladman propose that the inclusion of land around Wymondham, where much needed education capacity can be provided on site, should be included within the GNLP.
- 4.5.14 Taking into consideration the comments made above in relation to housing need and the case for flexibility in planned levels of supply, should committed and other sites fail to come to fruition, Gladman believe that not only should a contingency site around Wymondham be included, but that the site should be allocated. Allocating the land for housing provides greatest certainty that site can come forward without delay, is available and deliverable for housing and reduces the need for a future review.
- 4.5.15 In this regard, Land off Norwich Common, Wymondham represents a logical extension to the settlement and should be further considered for allocation through the plan making process.
- 4.5.16 Gladman consider that strategic gaps should have been reviewed and revised through the plan making process of the GNLP. Since defined and last reviewed the context for each strategic gap is likely to have altered taking into account more recent development. Evidence of this is clear in the case of the strategic gap between Wymondham and Hethersett. In recent years the character of the land at the north eastern edge of Wymondham along Norwich Common has significantly altered with new housing and employment development along the north of this road.
- 4.5.17 A thorough evidence-based assessment of all effected land parcels, together with wider related land has not been undertaken to consider whether strategic gaps remain a relevant and necessary designation to prevent the coalescence of settlements. As such, Gladman contend that the inclusion of the 'rolling over' of the strategic gap policy without a review is not based upon up-to-date evidence and is therefore not sound.

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Diss

- 4.5.18 Gladman is supportive of the identification of Diss as a Main Town within the settlement hierarchy. Diss has the widest range of shops and services of the main towns, as well as a broad range of employment opportunities. The town is located to the north west of the junction of the A140 and A143 and benefits from rail connections to Norwich and London as well as acting as hub for local bus links. As such, the settlement forms a sustainable and logical location for further development.
- 4.5.19 Diss has a key role to play in supporting the surrounding villages and rural hinterland through its services and facilities. The retail offering of Diss is key in this supporting role with the large rural catchment extending in to parts of South Norfolk and northern Suffolk. As such, Diss demonstrates positive vitality and viability and has the opportunity to support further housing growth. There would be strong justification to provide further growth than is currently proposed in Diss due to this strong retail offering and other services, along with the good transport links to Norwich and beyond.
- 4.5.20 In progressing from the Regulation 18 consultation draft of January 2020 to the now submission version currently being consulted, matters have taken a backward step in Diss. The proposed strategy is now one which seeks to defer to the allocation of housing sites to the emerging Diss and District neighbourhood plan. One proposed allocation for 150 dwellings remains, with the emerging neighbourhood plan to determine the location of the remaining 250 dwellings to be allocated to Diss. In combination with the existing commitment of just over 300 dwellings, from the base date of the plan period, this takes the total housing target for Diss to just over 743 during the plan period.
- 4.5.21 For one of the main towns, the most significant settlement in the south of the plan area serving a wide rural hinterland with the largest retail offer outside of Norwich, this is an insufficient development quantum.
- 4.5.22 Reasons stated for limiting the level of growth towards Diss are attributed to environmental constraints and traffic constraints, based upon local evidence. Gladman are promoting land south of Burston Road (GNLP4049). Assessed following the close of the Regulation 18 consultation, the site is recognised as suitable for further consideration (Diss booklet of sites evidence base paper). Based on the concept plan prepared to date we have sought to address 'amber' scoring issues, summarised as townscape and landscape considerations, to show that environmental impact is not an insurmountable constraint. Therefore, the issue in bringing

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this site forward is not an environmental one but instead highlighted as highways. It therefore follows that environmental concerns cannot be a reason for limiting growth in Diss.

- 4.5.23 Instead, the limiting factor is considered to be purely a highways constraint. Recognising this fact, it is therefore considered inappropriate to leave the decisions around the majority of housing allocations of Diss to the emerging neighbourhood plan. Seeking to resolve the highways issue in Diss is considered to be a strategic matter best tackled during the local plan making process, not through the neighbourhood plan. We would welcome allocations being left to the community to decide if this was in addition to a suitable quantum of development steered towards Diss.
- 4.5.24 Paragraph 102 of the Framework is clear that transport issues should be considered from the earlier stages of plan-making so that potential impacts of development on transport networks can be addressed. Whilst issues have been identified it is considered that there is currently insufficient evidence to seek to limit the quantum of development directed towards Diss for these reasons. If this was such an insurmountable issue, referring site allocations to the neighbourhood plan, a mechanism inappropriate to tackle highways constraints is only likely to exacerbate the highways issue.
- 4.5.25 The Diss Network Improvement Strategy (April 2020) has identified a number of junctions requiring improvement and options for providing these improvements. It appears that little regard has been had for changing transport technology and usage over the plan period and how this could alleviate highways concerns. For example, as a longer-term impact of the coronavirus pandemic commuting patterns may change allowing for further growth in one of the main towns where services and facilities are readily available, allowing development to be focussed in locations which are or can be made sustainable, as per Paragraph 103 of the Framework.
- 4.5.26 Instead, we are left to rely on a report which states that by 2036 the Morrison's junction would be over capacity with improvements needed. Doing nothing to address this is therefore not considered to be an option. Other options assessed, and ruled out, to address this can be summarised as either a northern link road or southern link road. These are considered to be extreme options which would cement commuting patterns rather than seeking to support a shift. Further testing should have been undertaken to determine a quantum of development that could be satisfactorily delivered without the need for new link roads. .. In this regard, further development than identified would be expected to contribute towards unlocking the necessary improvements identified.

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**Policy 7.3 The Key Service Centres***Poringland*

- 4.5.27 Poringland (including Framingham Earl) is identified in table 1 of the Regulation 19 consultation document as having the 6<sup>th</sup> largest population when compared to the 15 settlements in the Greater Norwich Area. Making it the second largest Key Service Centre after Hethersett, and larger than the Main Towns of Long Stratton and Harleston. This indicates the sustainability and popularity of Poringland within the Greater Norwich Area.
- 4.5.28 The Key Service Centres, of which Poringland is one, are described as having “a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas.” Poringland does have a good range of services which include both a primary school and a secondary school, village hall, community hall, pharmacy, post office, two doctors’ surgeries, a dentist, O’Fylhns Budgens Supermarket and numerous other shops and services. Norwich is also only approximately 6 miles (9.6km) from Poringland and is accessible via sustainable means of transport within 15 minutes.
- 4.5.29 As such, Poringland demonstrates positive vitality and viability and has the opportunity to support further housing growth. There would be strong justification to provide further growth in Poringland due to being host to a range of services and facilities, along with the good transport links to Norwich and beyond.
- 4.5.30 The ‘Towards a Strategy’ document identifies a requirement for 400-600 dwellings in Poringland. However, the proposed strategy for Poringland in the Greater Norwich Regulation 19 Plan does not allocate any further growth to Poringland. There are 536 dwellings with planning permission at the base date of the plan meaning that a substantial amount of land continues to be promoted for development in Poringland/Framingham Earl (including land in adjacent parishes of Bixley, Caistor St Edmund, Framingham Pigot, Framingham Earl, and Stoke Holy Cross). This high level of commitment suggests limiting further growth to Poringland going forward to this plan.
- 4.5.31 Aside from stating prior development commitments as a reason to limit growth, there are additional issues relating to the rural nature of large parts of the parishes, with the distinctive setting created by areas of heavily wooded former parkland. The 2012 South Norfolk Place Making Guide suggests that development should not further accentuate the linear settlement pattern. The settlement has a history of surface water and ground water drainage difficulties, which will be a consideration for many sites in Poringland and Framingham Earl, and

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mitigation will be needed for any development on such sites. Amongst the constraints to further development is the need for a new additional primary school.

- 4.5.32 Gladman are concerned that currently no further growth is directed towards Poringland. As stated above the town provides a sustainable setting for future growth, in a place where people want to live. Deliverable sites should come forward in this location that could contribute to local economic, social and environmental aspirations. Gladman believe the spatial strategy for housing growth needs to direct higher numbers to sustainable settlements within the 'Key Service Centres' tier, such as Poringland. This would help alleviate the pressure of delivery for larger strategic sites, with smaller allocations that could deliver during the early stages of the adoption of the plan. It also provides more certainty than the approach to allocate up to 1,200 homes within the "Village Cluster" on smaller sites in much smaller settlements which are not deemed as sustainable as settlements in the Key Services such as Poringland.
- 4.5.33 While it is accepted that Poringland has taken some growth, providing no new allocations is counterintuitive to the role Poringland plays in the District. As explained previously, Poringland is a sustainable settlement with sites readily available and deliverable now, that could provide extensive benefits to the community and help boost significantly the supply of housing as emphasised through national policy.
- 4.5.34 Gladman consider that allocating no new development through the Regulation 19 GNLP to a sustainable settlement such as Poringland will not provide the flexibility needed to ensure land supply is met over the plan period. The level of new growth to be directed to the settlement should be substantially increased.

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## 5 GNLP REGULATION 19 CONSULTATION PART 2 – THE SITES

### 5.1 NORWICH

5.1.1 Gladman supports Norwich being identified at the top of the settlement hierarchy as the most accessible and sustainable location in the area. The Pre-Submission Draft GNLP sets out the following housing figures for Norwich:

- Homes delivered in Norwich between 1<sup>st</sup> April 2018 to 31<sup>st</sup> March 2020: 1,885
- Unimplemented planning permissions and allocations in existing local plans: 5,254
- New allocations and uplift on existing allocations: 4,527
- Total: 11,666

5.1.2 Gladman notes that whilst a large number of sites contributing to the above benefit from planning permission, there are a number of sites allocated in previous local plans which have been brought forward into the GNLP. Gladman questions whether there is sufficient evidence to confirm that these sites will realistically be delivered within the plan period.

5.1.3 As previously mentioned there are risks to the delivery of a large number of dwellings in one market location such as market saturation and Gladman questions whether it is realistic to assume the total number of dwellings assumed will be delivered

5.1.4 Whilst Gladman supports regeneration there is also the question as to whether sites with medium to long term potential such as the East Norwich Strategic Regeneration Area, will deliver over the plan period. Additional infrastructure requirements, costs and remediation works associated with brownfield development need to be taken into consideration when making assumptions on delivery timescales.

### 5.2 MAIN TOWNS

5.2.1 Gladman supports the identification of Diss and Wymondham as Main Towns and submits that the sites we are actively promoting in these locations should be allocated to offer greater flexibility and to ensure that the housing need can be met over the plan period.

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## 5.3 KEY SERVICE CENTRES

5.3.1 Given previous comments made regarding the sustainability of Poringland and its connectivity to Norwich, Gladman submit that the level of growth directed to Poringland should be increased in order to provide the flexibility needed to ensure land supply is met over the plan period.

## 5.4 COSTESSEY CONTINGENCY SITE

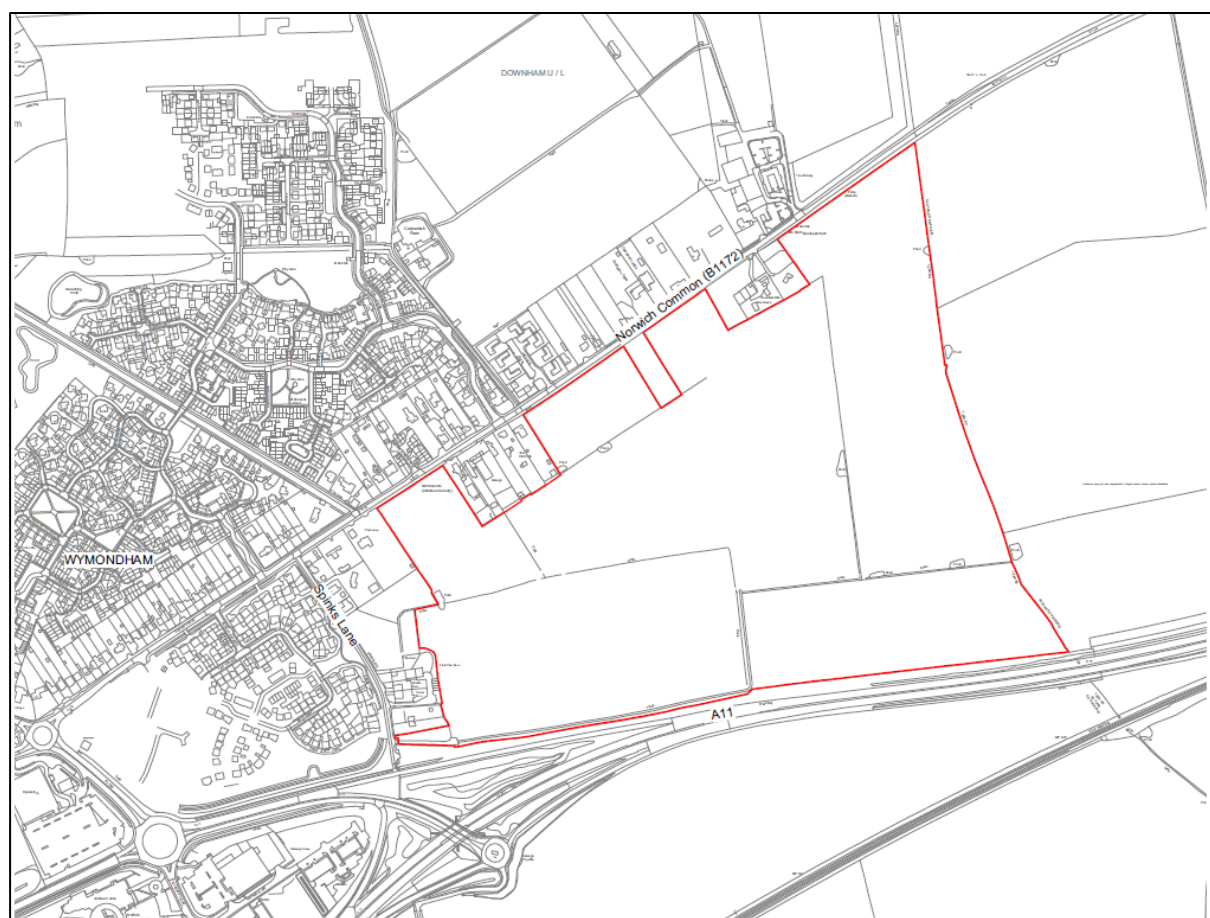
5.4.1 Gladman notes the identification of a contingency site which will become an allocated site in the event the GNLP is not delivering housing at the anticipated rate. Gladman submits that the site we are promoting at Norwich Common, Wymondham would be a more suitable alternative for inclusion under this policy for the following reasons:

- The site is being actively promoted by Gladman, we have the experience and expertise to deliver a site of this scale.
- An outline planning application has been submitted by Gladman to South Norfolk Council and the technical information submitted with the application demonstrates that there are no constraints which would prohibit the development of the site.
- We are working with South Norfolk Council and have offered to provide additional land for education and other community uses as part of the development.
- The site can be suitably accessed using land entirely within our control.

## 6 SITE SUBMISSIONS

### 6.1 Land at Norwich Common, Wymondham

6.1.1 Gladman is promoting Land at Norwich Common, Wymondham for residential development through the GNL. The site has capacity for between 550 and 600 dwellings and extends to 39.59ha in area. Figure 1 below shows the extent of the land being promoted by Gladman through this process.



*Figure 1: Land at Norwich Common, Wymondham*

6.1.2 A vision document prepared to illustrate how the Site may come forward for development is submitted in Appendix 1 to this representation. The vision document confirms to a high level the constraints and opportunities and outlines the benefits which the development may bring to the local area and wider plan area.



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### Availability

- 6.1.3 Gladman can confirm the availability of the Land at Norwich Common, Wymondham for development now. Gladman is engaged in a promotional agreement with all required landowners to deliver the Site, and as such can confirm that all landowners support the development of the Site. The Site is not subject to any tenancies or covenants which would delay or prevent the development of the Site. The Site is not known to be affected by any ransom strips.
- 6.1.4 Gladman is committed to bringing the Site forward for development, as confirmed by the submission of an outline planning application for up to 630 dwellings in March 2019 which remains pending determination.

### Achievability/Suitability

- 6.1.5 The submitted planning application confirms the achievability/suitability of the Site for residential development. The application includes a comprehensive suite of technical evidence base prepared to support the submission of an environmental statement.
- 6.1.6 The proposed layout of the site provides for safe and sufficient access into the Site. Gladman is engaged in ongoing discussions with the County Council and Highways England about effects of the development on the wider highway network in the context of this planning application.
- 6.1.7 It is Gladman's view that the development of Land at Norwich Common, Wymondham would not adversely affect the strategic gap currently defined between Wymondham and Hethersett. To demonstrate this the concept plan included in the vision document shows how the eastern edge of the site can be softened in order to minimise any potential harm to the Strategic Gap.

### Deliverability

- 6.1.8 The Site is immediately available for development and could, if allocated and approved for development, make a contribution to towards the five-year housing supply of the joint plan area.
- 6.1.9 The scale of the Site and opportunity for multiple access points means that the development could be developed by multiple outlets increasing the annual delivery rate which may be anticipated at the Site.

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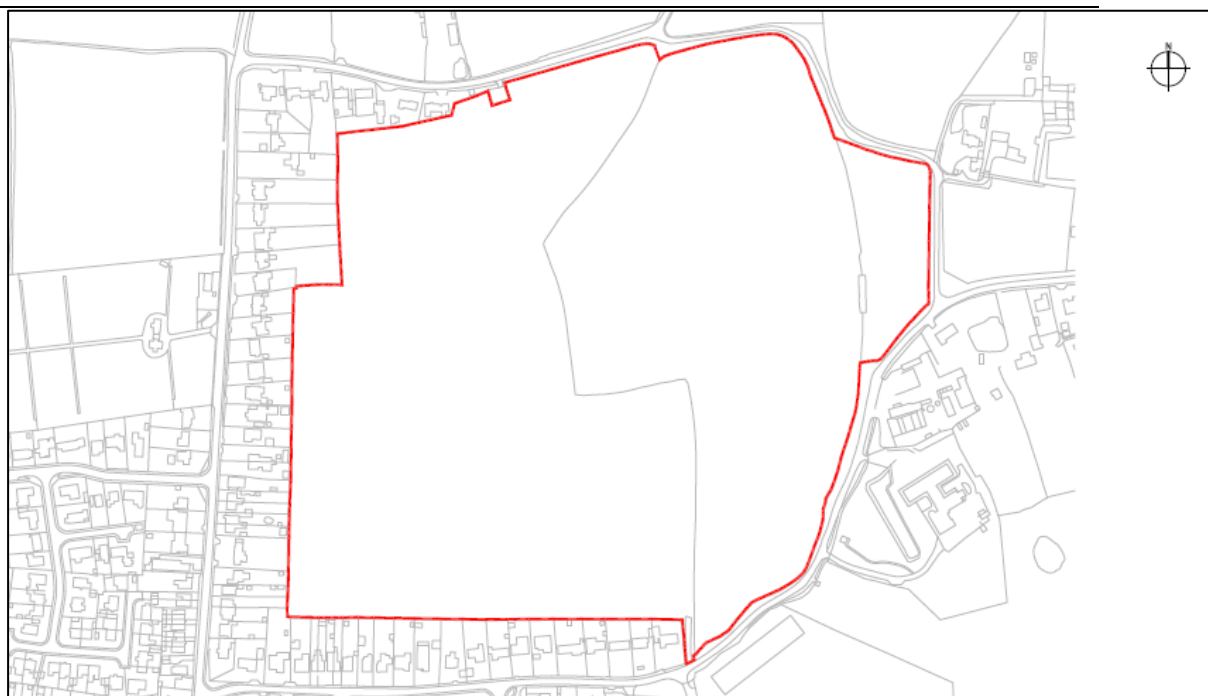
## Benefits

6.1.10 The land at Norwich Common, Wymondham has the potential to deliver significant benefits to the local area and the wider community, including:

- The development of between 550 and 600 dwellings, providing for a wide range of tenure, size and types of new homes;
- The delivery of 33% affordable homes;
- Land sufficient to accommodate a Primary School;
- Land sufficient to accommodate a future expansion of Wymondham High Academy;
- C2 Apartments responding to the housing needs of the elderly;
- A new local centre with opportunity for retail space and a community hub for new and existing residents;
- Child play provision inclusive of a NEAP;
- A Community Park;
- The opportunity to enhance the gateway into Wymondham;
- Pedestrian and cycling links/improvements.

## 6.2 Land at Burston Road, Diss

6.2.1 Gladman is promoting Land at Burston Road, Diss for residential development through the Greater Norwich Local Plan. The Site extends to around 20ha in area and Gladman remain open to a discussion around scale and potential community benefits. Figure 2 below shows the extent of the land being promoted by Gladman through this process.



*Figure 2: Land at Burston Road, Diss*

- 6.2.2 Gladman reiterate that this is a sustainable location suitable for residential development. Suitable access can be achieved from the north off Burston Road.
- 6.2.3 As part of our proposals, and due to the proximity of the site to Diss High School, Gladman are willing to provide land for educational purposes and are open to discussions in this regard. An initial concept plan prepared to illustrate how the Site may come forward for development is submitted as Appendix 1 to this representation. The concept plan confirms to a high level the constraints and opportunities and outlines the benefits which the development may bring to the local area and wider plan area.
- 6.2.4 Gladman can confirm the availability of Land off Burston Road, Diss for development now. Gladman is engaged in a promotional agreement with the landowners to deliver the Site, and as such can confirm that the landowners support the development of the Site. The Site is not subject to any tenancies or covenants which would delay or prevent the development of the Site. The Site is not known to be affected by ransom strips.
- 6.2.5 If allocated, the development of Land at Burston Road, Diss could deliver significant benefits to the local area and wider community, this includes:
- Development of an appropriate scale for its location, providing for a wide range of tenure, size and types of new homes;

- 
- The delivery of policy compliant affordable homes;
  - Land available for education uses to be discussed with relevant parties;
  - Child play provision inclusive of a LEAP;
  - A Country Park for the enjoyment of new and existing residents; and
  - Potential highways improvements along with pedestrian and cycling links/improvements. Gladman are also exploring the possibility of including live/work units on site to limit impacts on highways.

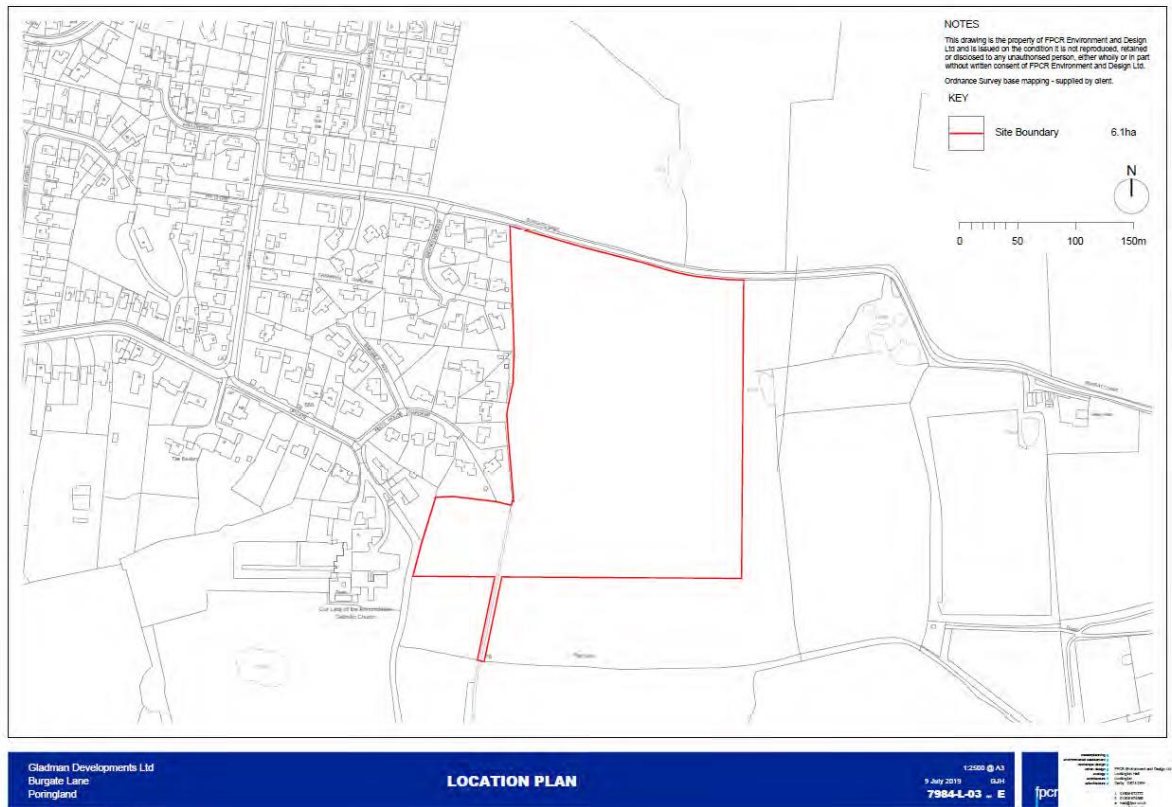
### 6.3 Land south of Burgate Lane, Poringland

6.3.1 Gladman is promoting Land at Burgate Lane, Poringland for residential development through the Greater Norwich Local Plan. The Site has a capacity for around 98 dwellings and extends to 6.1ha in area and can be accessed from Burgate Lane. Figure 1 below shows the extent of the land being promoted by Gladman through this process.

6.3.2 Gladman can confirm the availability of Land off Burgate Lane, Poringland for residential development now and this commitment is demonstrated through the submitted planning application (2019/1593) and subsequent live appeal (APP/L2630/W/20/3262063).

6.3.3 It is noted that the site has been assessed in the Regulation 18c Consultation (January – March 2020) under site ref GNLP2153 and was considered to be a reasonable alternative. The site assessment indicated amber ratings for “utilities capacity, flood risk and market attractiveness”.

6.3.4 The planning application includes a comprehensive suite of technical evidence which shows there are no adverse effects of the development that cannot be mitigated against. Specifically pointing to the Flood Risk Assessment which concludes that the site falls wholly within the EA Flood Risk Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding).



6.3.5 Further, in regards to the market attractiveness, Poringland is an attractive place in the Greater Norwich Area to live and Gladman have letters of interest in the site from multiple national and local housebuilders which have been submitted as part of the live appeal.

6.3.6 If allocated, the development of Land at Burgate Lane, Poringland could deliver significant benefits to the local area and wider community, this includes:

- Development of an appropriate scale for its location, providing for a wide range of tenure, size and types of new homes, including live/work units;
- The delivery of at least a policy compliant number affordable homes;
- A considerable amount of public open space which will include areas of amenity open space, a wildflower meadow, structural planting and footpath connections to the wider right of way network;
- Opportunities to achieve net gains in biodiversity through enhancement of existing green corridors, inclusion of landscape buffers and the inclusion of new tree, shrub and hedge planting with the creation of balancing facilities designed with the intention of maximising biodiversity benefits;
- Child play provision inclusive of a locally equipped play area;
- Potential highways improvements along with pedestrian, cycling and public transport links/improvements.

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## 7 CONCLUSIONS

- 7.1.1 Gladman welcomes the opportunity to comment on the Pre-submission draft of the Greater Norwich Local Plan and hopes that these representations are found to be constructive. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF2019) and the associated updates that were made to Planning Practice Guidance.
- 7.1.2 Greater Norwich is a key growth area in the East of England region. As such, it is critical that the new Local Plan for Greater Norwich is aspirational and pro-growth. The proposals identified for the strategic growth areas and the Tech Corridor will require transformational growth across the area. In reflection of this, Gladman considers that the proposed housing requirement for the GNLP must be economic led.
- 7.1.3 Gladman is supportive of the Settlement Hierarchy and the overall direction of growth, however we question how realistic some of the GNDB's delivery assumptions are, as there is a concentration of growth around Norwich. Gladman submits that further allocations should be identified to offer flexibility and to ensure the strategy within the GNLP can be achieved over the plan period. The sites promoted by Gladman at Diss, Wymondham and Poringland offer suitable and deliverable sites which can realistically deliver housing during the plan period.
- 7.1.4 Gladman looks forward to engaging further with the Councils during the examination of the GNLP and welcomes the opportunity to work with the GNDB. Should the GNDB wish to discuss any of the content of these representations further then please do not hesitate to contact a member of the Gladman team.

## APPENDIX 1

Land off Norwich Common, Wymondham Vision Document

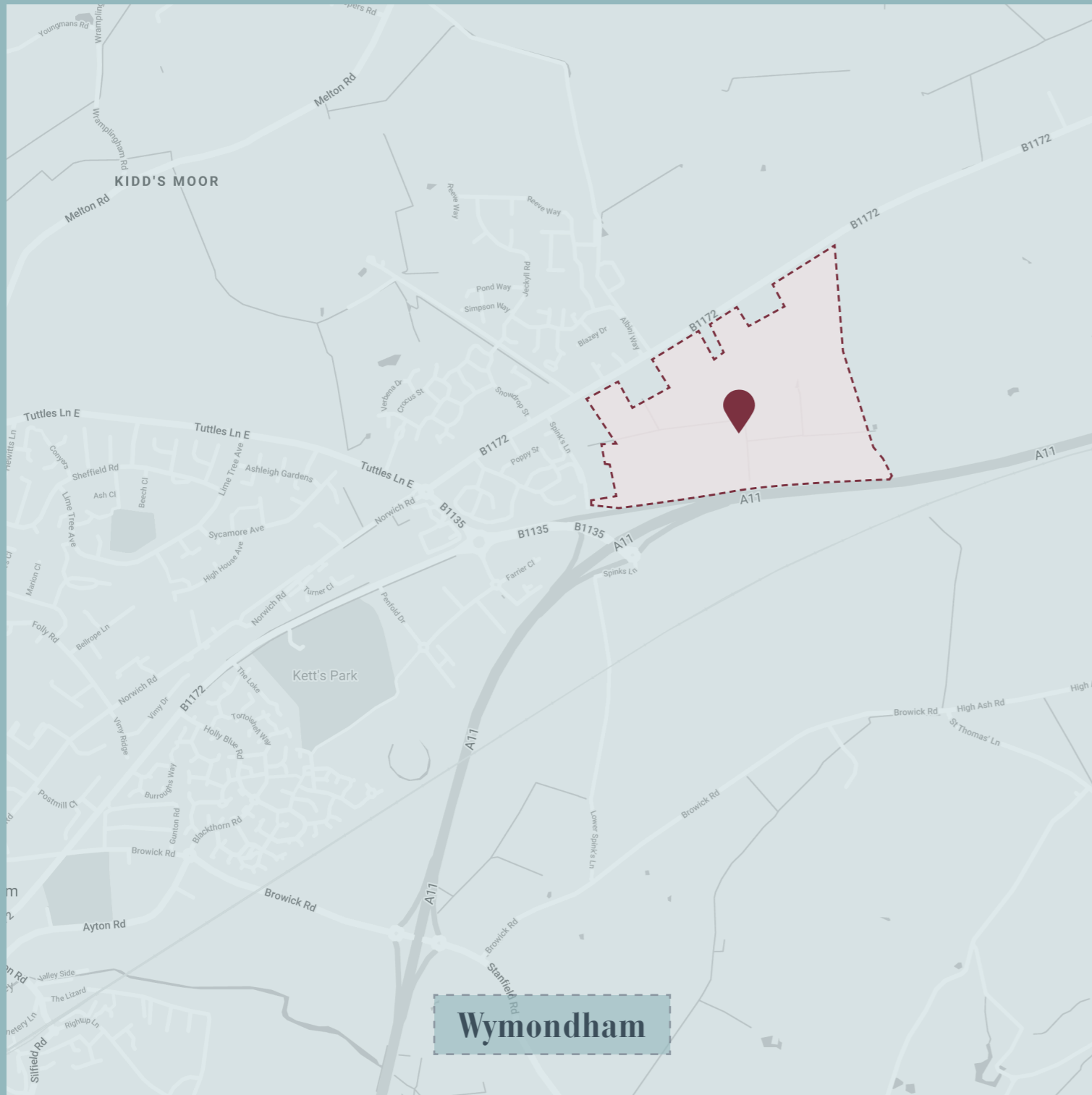
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# The Vision for land off Norwich Common, Wymondham


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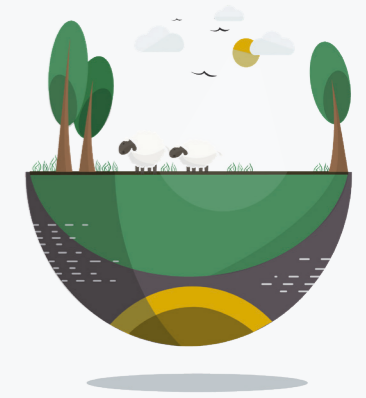






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# Introduction

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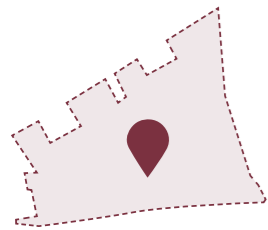
Gladman Land is a privately funded, family run business with over 30 years' experience in the land and development industry. From our beginnings in housebuilding, through to commercial and industrial properties, we have a solid history of delivering sites quickly.

## HOW WE ENSURE A SITE IS VIABLE AND DELIVERABLE

We enter into transparent Promotion Agreements with landowners rather than the more complex Option Agreements and thoroughly review a site's viability before an Agreement is entered with a landowner. This ensures that the proposals can provide the full policy compliant affordable housing requirement and CIL compliant planning obligations when an application is submitted. On average, Gladman provide circa £12,000 per housing plot on schemes throughout the UK.

Our initial viability work and detailed due diligence ensure that proposals are deliverable without delay. Once outline planning consent is achieved, a development will normally commence within 18-24 months. In many cases a planning condition can be attached reflecting this timescale to give the Council certainty on delivery.

Once planning consent is achieved, we sell the site to a housebuilder. Having sold sites to all the major Plc house builders as well as to a huge range of small to medium sized housebuilders and Registered Providers over the past few years, we ensure that that the outline planning application documents are compatible with future reserved matter applications.



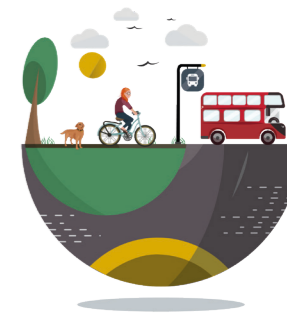
# The Site

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Gladman is working with the landowners of Land off Norwich Common to promote their site for development. The 39.59-hectare site presents an ideal opportunity to deliver a high quality, sustainable mixed-use development to address Greater Norwich's future housing, education and recreation needs.

An outline application for the Site was submitted to South Norfolk District Council for the development of up to 630 new homes, apartments with care, a new local centre and land for a new primary school in March 2019. This Vision Document summarises the technical and environmental work which has already been completed for the Site which demonstrate the deliverability of the land, and its ability to make a timely contribution to the Greater Norwich future housing requirements.





# A Sustainable Site and Settlement

Land off Norwich Common in Wymondham is well positioned, within an established and thriving town, to accommodate further residential development to contribute to Greater Norwich's future housing needs.

With a population of approximately 14,405 residents (2011 census), Wymondham is designated as a Main Town in the adopted Joint Core Strategy for Broadland, Norwich and South Norfolk. Wymondham benefits from a good range of services and facilities that would be accessible for future residents of this site by walking and cycling, as well as a broad choice of shopping, leisure and employment opportunities. The site could accommodate land for a new primary school and a local centre which would be a significant benefit to both new, as well as existing, residents within the vicinity.

Land off Norwich Common also benefits from good public transport links to wider destinations including Norwich and Cambridge. The nearest bus stops are situated within 400m walking distance of the site and are served by eight services, together these services provide circa 5-6 buses per hour in each direction between Wymondham Town Centre and Norwich City Centre.

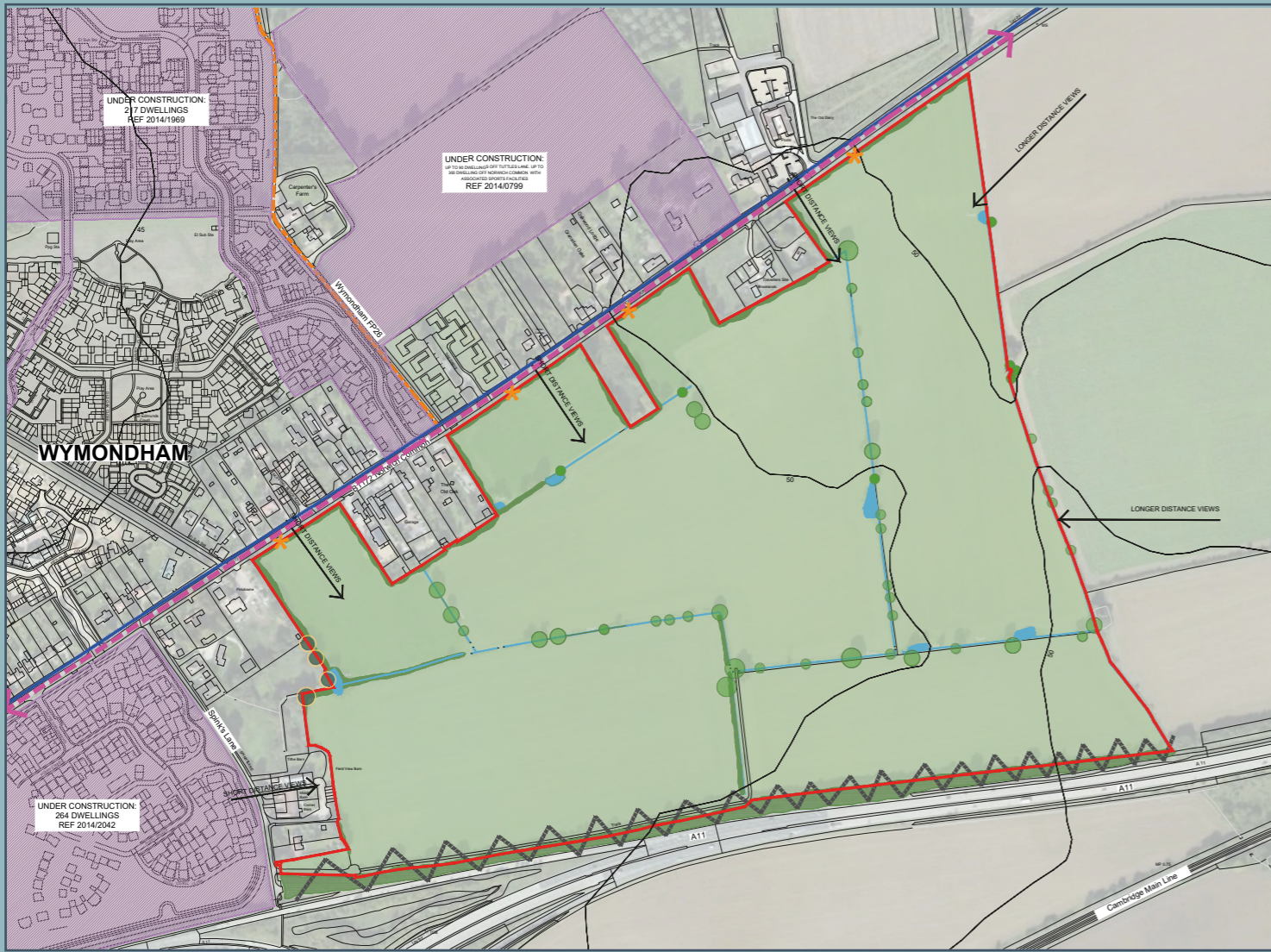
The nearest train station is approximately 3.5km from the Site at Wymondham Railway Station and provides frequent services to destinations including Norwich and Cambridge.




## Key

- |                |                             |                                     |                                  |                          |                             |                            |
|----------------|-----------------------------|-------------------------------------|----------------------------------|--------------------------|-----------------------------|----------------------------|
| Social Club    | Supermarket (Lidl)          | Wymondham Garden Centre             | North Wymondham Community Centre | Wymondham Leisure Centre | Browick Road Primary School | Railway Station            |
| Medical Centre | Ketts Park Community Centre | Ashleigh Primary School and Nursery | Shop (Co-Op)                     | Wymondham High School    | High Street                 | Supermarket (Morrisons)    |
| Pharmacy       | Wymondham Garden Centre     | Robert Kett Public House            | Wymondham Medical Centre         | Wymondham Library        | Windmill Surgery            | Robert Kett Primary School |





## Key

	Application Site Boundary	39.59ha		Contours (height in metres AOD)		Existing Watercourse
	Potential Location for Site Access			Potential Views Into Site		Consented Development (See South Norfolk Council Planning Portal)
	Main Vehicular Access			Potential Noise Issues		Existing Vegetation
	Pedestrian / Cycle Route			TPO Tree		
	Public Right of Way					



# Opportunities & Constraints

As part of the development proposals, a multi-disciplinary team of specialist consultants have been commissioned to undertake a series of detailed surveys and appraisals of the site and its setting.

These technical studies have assessed the site's ability to accommodate a sustainable residential development, taking account of features and characteristics including landscape, heritage and access. The full suite of accompanying documents can be found on South Norfolk Council's website.



# The Site: Suitability for Development



## Utilities

All on-site utilities have been fully assessed during the consultation process. Potential connections to the existing network have been investigated and all utility provisions within the current strategy have been determined to be technically sound.



## Flooding

A Flood Risk Assessment has been undertaken which demonstrates that the site is located in Flood Zone 1 and therefore at a low risk of flooding. There are localised areas of surface water flooding on the site but these do not represent a constraint to development of the site with a effective drainage solution proposed.



## Biodiversity & Open Space

Existing green infrastructure is to be retained and enriched through planting and the creation of formal, easily accessible green spaces. It is envisaged that an on-site local play area will be provided as part of the proposed development, as well as a community park which will further improve the local amenity for both future and existing residents.

All open space and green infrastructure proposals are considerate to the local environment. The completed ecological assessment work concludes that the development will provide net biodiversity gains across the site.

On site surveys for protected species have been completed and conclude that these species do not represent a constraint to developing the Site for housing.



## Landscape character and design

The site is not subject to any national or local landscape designations. The site provides an opportunity to provide a soft edge to Wymondham south of Norwich Common through a scheme of landscaping and planting using species commonly found in the area.

A Landscape and Visual Impact Assessment demonstrates that development of the site will not result in a significant adverse impact on landscape characteristics of the area. The development site will successfully integrate with the urban edge and the landscape surroundings.



## Noise & Air

A noise assessment has been completed considering the likely direct and indirect noise vibration effects from the potential development. The assessment concluded that during the construction phase, noise and vibration activities would not likely have a significant effect and neither would it during the operational phase.

An air quality assessment has been completed and concludes that the overall construction and operational air quality effects are judged to be not significant. The assessment also concludes that the site provides an opportunity for development in which the effects of local air quality for residents and users can be shown to be acceptable, with concentrations below the air quality objectives.



## Access & highways

Multiple access points in to the site are available from Norwich Common including a potential separate access point for apartments with care.

The site provides the opportunity for development to link into the wider public right of way network to the north, as well as the provision of significant new footpath infrastructure around the site.

The location of the site provides a good context for journeys to be undertaken on foot and bicycle.



## Heritage

There are no designated heritage assets within the site boundary. The completed archaeological and built heritage assessment concluded that the development site would not result in any adverse impacts to nearby assets with regards to their settings.

This has been confirmed by South Norfolk's Historic Environment Team who have not raised an objection to the development on heritage grounds.



# Key Concepts

The proposed Land south of Norwich Common could deliver approximately 630 dwellings including 208 affordable homes. Current proposals for the Site include a local centre, land for a new primary school and apartments with care alongside a Neighbourhood Equipped Area of Play (NEAP) and a community park creating accessible recreational opportunities for both new and existing residents.

The vision for the Site has been informed by a series of key concepts that respond directly to the existing characteristics:

- Locate development within a strong network of green infrastructure, complementing existing tree and hedgerow planting with new areas of formal and informal open space and landscape features
- Provide a substantial landscape buffer along the eastern boundary to create a soft edge for the approach to Wymondham
- Provide sufficient land for the delivery of a new primary school to serve both new and existing residents
- Provide a local centre along Norwich Common
- Provide new and enhanced connectivity for pedestrians and cyclists, helping to integrate the site into the existing urban area, whilst promoting access to the wider countryside
- Deliver a wide range of high quality, market and affordable. In accordance with local policy requirements, 33% of the on-site housing would be affordable, to address the acute affordability issues affecting the local housing market.



# Key Benefits



Equipped areas of play



Newly accessible open space



Diversifying the range of on-site habitats and net biodiversity gains



High quality market housing and affordable homes



Land for a primary school



A local centre



Extra care apartment



# What could the Development Deliver?

## Land for a new primary school

The site would be capable of providing land for delivering a new primary school to assist in addressing the identified local shortfall.



## A new Local Centre

Alongside other social benefits, the site has the potential to deliver a Local Centre creating a community hub for both existing and new residents.



## Apartments with Care

The site can assist in addressing the shortfall of specialist housing for the elderly in the area through the provision of C2 use extra care apartments.



## High Quality market and affordable homes

The site is capable of delivering up to 630 homes in a mix of sizes and tenure to reflect the local area, including provision of 33% affordable homes. This will enable local people who are seeking an affordable home the ability to stay within their community.



## Biodiversity and Green Infrastructure

A significant proportion of the site will be green infrastructure. This will help and enhance existing landscape features, provide habitat connectivity and enhance biodiversity. New landscaping features will be incorporated into the development and will filter views of new homes.



## Recreational green space

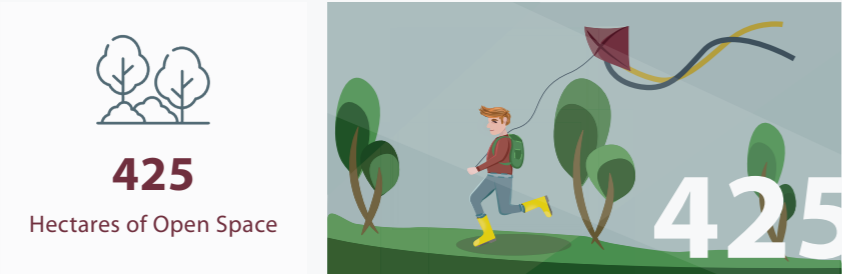
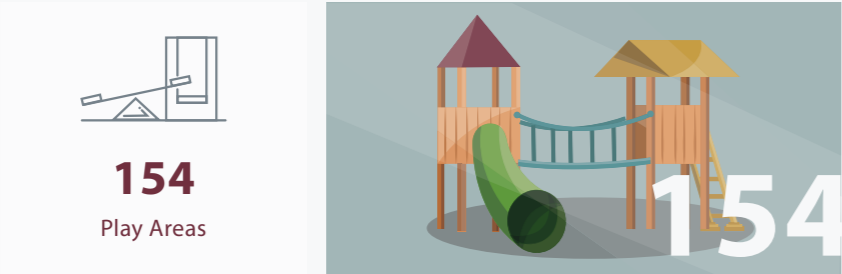
A significant amount of public open space is proposed on the site, connected by a series of footpaths to the wider network. As part of the public open space, the site could accommodate a community park featuring allotments, wildflower meadow and a community orchard.

A new children's play area will be available to both existing and new residents.



# More than Market Housing

Gladman has a strong record of securing much more than just market homes. Over the past 9 years we have achieved planning permission for the following:\*



These are significant public benefits which are being realised by local communities through our proposals. On average, Gladman secures £12,000 per plot for local services and facilities.

\*All contents correct as of October 2019





Development commences  
**17 months**  
after outline permission  
is achieved



Gladman has achieved  
over **177**  
planning permissions  
**since 2010**



Providing  
**25,615 homes**



## Summary and Delivery

Gladman believe that land south of Norwich Common provides a viable, realistic and logical opportunity to help Greater Norwich fulfil its housing needs over the emerging Local Plan Period.

Through this Vision Document it has been demonstrated how Land south of Norwich Common has the potential to support a sustainable residential development:

- The site is in the control of willing landowners who are committed to progressing the proposal as soon as possible;
- All the necessary technical and environmental studies have already been completed in support of the current pending application;
- In Gladman Developments Ltd, the site has the benefit of a promoter with the necessary experience and expertise to successfully guide a proposal through to implementation;
- The site has the ability to accommodate a high quality residential development that could be successfully assimilated into its landscape setting;
- The site is sustainably located in relation to Wymondham's services and facilities, and benefits from sustainable modes of transport;
- There are no known technical impediments or environmental constraints that could not be addressed through a sensitive and successful design, to deliver a high quality proposal in this location.

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## Next Steps

Thank you for taking the time to look at our proposals. We would welcome your views and are happy to answer any questions that you may have.

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