

Proposed Residential development on land east of Langley Road, Chedgrave

Response to Regulation 19 Consultation of the Greater Norwich Local Plan

on behalf of ESCO Developments Limited

Ref: GNLP 0463

1. Introduction

1.1 Brown & Co are instructed by ESCO Developments Limited to respond to the pre-submission draft Greater Norwich Local Plan (hereinafter 'GNLP') that is currently at its Regulation 19 consultation stage.

1.2 Representations to the Regulation 19 version of the GNLP can only be made in relation to the legal compliance and soundness of the Plan, in other words whether the Plan has been appropriately prepared in accordance with all relevant procedural and legal requirements, and whether it meets the tests of soundness within paragraph 35 of the National Planning Policy Framework (hereinafter 'NPPF').

1.3 It is considered that the draft Plan is basically sound, as the strategy proposed is essentially justified and effective and provides a range of sites by which growth can come forward. The site on land to the east of Langley Road, Chedgrave, offers an appropriate opportunity to deliver growth in a manner that is appropriate to the sustainable objectives of the emerging Local Plan and NPPF. By undertaking this form of development on this site in a sustainable manner it would support the emerging Local Plan.

2. Comments on the proposed strategy

Justified

2.1 The NPPF indicates that, to be justified, a Plan should set an appropriate strategy based on robust and credible evidence, with suitable consideration given to reasonable alternatives. It is considered that the proposed strategy is compatible with the overall purpose of the plan, in particular, the delivery of sustainable development which meets the challenges of climate change and supports ambitious local and national targets for carbon neutrality. The proposed distribution of growth is considered to be basically correct and suitably forward thinking to facilitate the transition to a post-carbon economy, and the emergence of the region as the UK leader in clean growth. In particular, we believe the proposed strategy is considered suitable to deliver beautiful places or spaces.

2.2 The draft plan indicates that a key objective is *"to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and plays a full part in meeting national commitments to achieve net zero greenhouse gas emission by 2050"* (page 38). The strategy, therefore, seeks to focus activities closer to centres of population, with good access to services and facilities, to facilitate a *"radical"* shift away from car travel and reduce associated vehicles emissions.

2.3 We believe the proposed strategy should focus on delivering a range of opportunities for development across the three Districts to ensure the delivery of growth in a sustainable manner. In essence, the growth needs to connect and enhance existing local services and access areas of open space and access to the countryside.

2.4 In order to significantly reduce travel by way of private vehicles, and therefore emissions, a place-based approach is essential (RTPI, Net Zero Transport: The role of spatial planning and place-based solutions (2021) page 2). This would further provide a catalyst for better placemaking in order to deliver healthier, happier, and more resilient communities. The RTPI report echoes the Building Better, Building Beautiful Commission in their assertion that creating walkable neighbourhoods is key, stating that the *"20 minute neighbourhood"* concept is one of the key foundations upon which net zero transport networks can be built.

2.5 As previously referred to in earlier representations, the site benefits from accessibility to a range of shops, services, and community facilities, including an infant, junior and high school, medical centre, library, several pubs, and a range of independent retail businesses. The village centre is approximately

350m from the access to the site off Langley Road, and would be readily accessible from it on foot or by bicycle.

2.6 In order to meet climate change targets, housing need, and support sustainable employment and economic growth, more is required than delivering housing units. Rather, the focus is shifted to the creation of beautiful places and vibrant, resilient communities. Residential development on this site can deliver a range of housing opportunities as well as significantly contribute to the green infrastructure and enhance the ecological value of the area in association with Langley Wood.

2.7 The creation of a residential development on this site would facilitate a modal shift from car reliance to walking and cycling through the creation of truly walkable neighbourhood. It would provide a suitable option for development now and represents the most effective way to significantly reduce transport emissions, and to create truly beautiful places and spaces. By creating a neighbourhood predicated on a green infrastructure network, supported by public transport links it would ensure that walking and cycling form the primary modes of transport throughout the settlement, therefore, significantly reducing transport emissions whilst creating beautiful spaces.

2.8 We understand the need to respect the heritage features of the area, as identified through the HELAA assessment exercise. We believe that given the proximity of Langley Park and the potential impact on the wider setting of the Grade 1 listed building, and the Norfolk Broads, any impact that potentially could occur can be mitigated against as we develop our proposals with officers.

Effective

2.9 In order to be considered effective, the NPPF states that the proposed strategy should be deliverable over the plan period. We believe with a suitably designed scheme, which recognises the constraints of the site could be delivered in such a way as to minimise landscape harm with the ecological and recreational benefits it potentially would bring. For the purposes of paragraph 47 of the NPPF, the site is deliverable as it is available now; achievable with a realistic prospect of delivering housing within five years.

2.10 The site is being advanced by a promotor, and there are a number of residential developers who are keen to construct this site. There are no significant physical constraints to the development of the site and we remain confident that this site can deliver housing units early in the lifetime of the Plan.

2.11 Demonstrating deliverability is fundamental to achieving a sustainable, well-planned development. As has been evidenced with Local Plans across the country, proposed allocations, particularly those for large-scale housing, can falter where it is considered that sufficient work has not been undertaken to robustly demonstrate their viability or deliverability. In order to provide an effective strategy that would deliver the requisite housing within the plan period to meet local needs, it is considered necessary to provide a range of sites to create a number of outlets for growth to ensure growth is achieved through the Plan period.

2.12 This site is being promoted by a locally based promotor that has delivered housing development in the area and can develop appropriate, green-led proposals for the site. The proposal site is within a single landownership, as a result there would be no disputes regarding which elements of the development come forward first, no time-consuming discussions around equalisation, and no negotiations over the distribution of infrastructure cost, all of which can cause significant delay and even permanently stall projects.

2.13 We are currently preparing an outline planning application for the site, which will address matters such as wildlife and ecology; flooding and drainage; design; contamination; landscaping; and highways. We do not believe there are any serious obstacles in delivering this site and we have had a positive response to the pre-application discussions with officers from the District Council.

3. Conclusions

3.1 The GNLP in its current form is considered to be sound as the strategy adequately delivers on the overall purpose of the plan in providing a range, in particular addressing the challenges of climate change and supporting ambitious local and national targets for carbon neutrality. We would support the distribution of growth insofar as it seeks to support the Service Villages and sustain them for the foreseeable future and facilitate the transition to a post-carbon economy or to create truly beautiful places or spaces. The draft GNLP recognises the need to deal with the challenges of climate change and carbon neutrality and adapt accordingly, and this is supported.

3.2 The proposed development would make a positive contribution to the provision of market and affordable housing in the area. The proposal would also add to the range of housing sites available in the locality, providing flexibility and a wider choice of development opportunities to the market, and thus strengthening the local supply of housing land. By providing sufficient land of the right type in the right place to support growth, the development would address the economic dimension of sustainable development, as defined in the NPPF.

3.3 We consider this form of development that is part of the draft allocation for this village, led by the green credentials of the locality would result in tangible benefits for the community and provide housing in a holistic and sustainable way in order to create a vibrant and resilient community and support the move to a post-carbon economy. Government has recognised the role that residential development can have in achieving sustainability and creating communities, where there is no choice between quality and quantity and green spaces amount to more than token verges and squares. Provision of significant open space on Snow Hill, would create a significant area of green space, something which has become more important than ever in light of the pandemic. The relationship of the site with the existing services and facilities in the area will result in a sustainable form of development that will contribute significant benefits to the area.