

Greater Norwich Local Plan Team
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BY EMAIL: gnlp@norfolk.gov.uk

22 March 2021

Via Email only

Your ref: GNL4057A

Our ref:
SIL001/HP/MH

Dear Sirs,

**Greater Norwich Local Plan – Regulation 19 Consultation
Submission**

SITE REFERENCE: GNL4057(A-C) – PARK FARM, SILFIELD

I am writing on behalf of Orbit Homes (Orbit), J Alston and Sons and Pelham Homes, led by Orbit, regarding the Regulation 19 consultation of the Greater Norwich Local Plan (GNLP). David Lock Associates (DLA) are instructed by Orbit as the master planners and planning consultants for a strategic scale new settlement within South Norfolk, known as Silfield Garden Village (**SGV**).

At the outset we would like to strongly support the Greater Norwich Development Partnership (GNDP), the respective Local Authorities and GNLP Officers' approach for progressing plan-making activities during the Coronavirus pandemic and commend the efforts made to allow this consultation to take place.

This Regulation 19 submission supplements the submission made to the Regulation 18c consultation in March 2020 which remains relevant and should be read in conjunction with this submission. In particular, the suite of SGV technical submissions made to the Regulation 18c remain applicable and should be considered as part of the new settlement proposal work moving forward.

Background and Previous Submissions

The Regulation 18c consultation submission highlighted that a number of sites related to the current SGV proposal area have been promoted on behalf of the landowner in previous GNLP consultations for large scale development (*See Regulation 18c Covering Letter*). The Regulation 18c submission sought the consolidation of the various sites previously submitted under separate representations into a single site promotion.

During Summer 2020 DLA, on behalf of Orbit, liaised with GNLP officers to consolidate the sites referenced in the March 2020 representations and ensure the site boundary for the GNLP Sites

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Map was accurate. The consolidated site promotion was given the new site reference **GNLP4057A**, which includes 6,500 residential dwellings, local green infrastructure, education provision, employment et al. (see *Silfield Garden Village Development Prospectus*, September 2019 submitted as part of the Regulation 18c submission) and represents the **core SGV proposal**.

Through this liaison DLA also clarified that Orbit are promoting additional land to the south of the SGV proposal boundary (Site Reference: GNLP4057A) for additional green infrastructure, circa 68.66 ha (Site Reference: GNLP4057B) and a solar farm, circa 54.91ha (Site Reference: GNLP4057C). The proposed additional green infrastructure and solar farm are ancillary to the core SGV proposal as additional benefits but are not necessary to make the core SGV development acceptable or policy compliant.

Orbit supports the above approach now agreed with GNLP officers, and we urge that the consolidated GNLP4057A site promotion reference is used from now on as the sole reference for the purposes of the new settlement work moving forward. It is not apparent from the online GNLP consultation map, but we hope that the Regulation 18c submission has been carried over to the GNLP4057 site reference.

Regulation 19 Representations

Since the Regulation 18c representations the draft GNLP has been amended to include Policy 7.6 (Preparing for New Settlements). Orbit strongly support the principle of the inclusion of Policy 7.6; an approach that reflects the NPPF requirements for 'positively-planned growth' and recognises that for the GNLP area development pressures are not likely to diminish over the life of the plan, particularly in the emerging strategic growth context shaped by the Cambridge-Norwich Tech Corridor Vision and Spatial Strategy, and economic growth in this part of the UK relative to Cambridge and the Oxford-to-Cambridge Arc, the government's priority area for global economic growth and investment.

Nevertheless, Orbit are of the view that the Pre-submission GNLP would benefit from amendment and/or further detail to ensure the GNLP meets the soundness test as set out at paragraph 35 of the NPPF. Further details can be found within our Regulation 19 submission which comprises of:

1. Covering Letter (*this letter*) – general introduction and commentary on GNLP procedural matters.
2. Greater Norwich Local Plan Representation Form.
3. SGV representation addressing issues relating to the *GNLP Strategy Document*. This representation includes the following appendices:
 - a. Technical Review of Housing Needs in Greater Norwich (Turley) Addendum.
 - b. Example Local Plan policies with regard to new settlements.
4. SGV representation addressing issues relating to the *GNLP Regulation 19 Sustainability Appraisal*.
5. SGV representation addressing issues relating to the *Housing and Economic Land Availability Assessment Addendum III (December 2020)*.

We would be grateful that you could provide confirmation that all the above representations and supporting documents have been received in full and will be considered as part of the GNLP Regulation 19 consultation.

Procedural concerns

We previously raised procedural concerns within the covering letter of the Regulation 18c consultation in relation to (i) the accessibility / navigation of the GNLP webpage; (ii) consultation documents being updated during the consultation period; and (iii) the approach of the GNGB in seeking to rely on numerous Development Plan Documents (DPDs).

We are pleased to see that the GNLP webpage has been refreshed to be more easily accessible than the previous consultation and no consultation documents have been updated during the consultation period (we note that the *Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy* was uploaded during the consultation period, but that this does not form part of the consultation material but is background evidence). Therefore, procedural concerns one and two as previously raised in the Regulation 18c consultation no longer apply.

Nevertheless, our procedural concern raised at Reg 18 stage - relating to the reliance on numerous DPDs for the assessment and allocation of land for development without the ability to assess the overall impact of these allocations through a comprehensive SA/SEA still applies - still remains.

We also raised procedural concerns with regards to how the three new settlement proposals - SGV, Hethel and Honingham Thorpe - were assessed, primarily in relation to how Honingham Thorpe has been inconsistently assessed across individual parcels. The concerns were raised at paragraphs 3.19 - 3.26 within the GNLP Sites Document representation (March 2020) and remain relevant. Our March 2020 comments have been supplemented with those raised in the Reg 19 representations addressing issues relating to the *Housing and Economic Land Availability Assessment Addendum III (December 2020)* and the *GNLP Regulation 19 Sustainability Appraisal* - part of this submission.

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We would be happy to discuss any matters raised within this submission further with you. Please do not hesitate to contact me or my colleague Matthew Hewitt (MHewitt@DavidLock.com) if you require any further information and we look forward to working closely with you on the new settlement work moving forwards.

Yours sincerely,



HEATHER PUGH
PARTNER

Email: hpugh@davidlock.com

cc: Matthew Hewitt, David Lock Associates
Ian Fieldhouse, Orbit Homes

Enc: Greater Norwich Local Plan Representation Form.

Main SGV representation addressing issues relating to the GNLP Strategy Document.
This representation includes the following appendices:

SGV representation addressing issues relating to the *GNLP Regulation 19 Sustainability Appraisal*.

SGV representation addressing issues relating to the *Housing and Economic Land Availability Assessment Addendum III (December 2020)*.