

GNLP Part 1 – The Strategy (Regulation 19 – March 2021)

Representations on behalf of Orbit Homes
prepared by David Lock Associates

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1.0 INTRODUCTION

- 1.1 These representations are submitted by David Lock Associates (DLA) on behalf of Orbit Homes, J Alston and Sons and Pelham Homes, who are leading the promotion of a strategic scale new settlement within South Norfolk, Silfield Garden Village (SGV) – *further detail outlined at Section 2 of this document.*
- 1.2 Our representation submission comprises of:
- (i) Covering letter (22 March 2021);
 - (ii) Greater Norwich Local Plan Representation Form;
 - (iii) Representation on the GNLP Strategy (*this document and Appendices*);
 - (iv) Representation on the HELAA (22 March 2021); and
 - (v) Representation on the Sustainability Appraisal (SA) (22 March 2021).
- 1.3 We wish to commend and 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.
- 1.4 We support the approach to continue the GNLP plan-making process as closely to the Local Development Scheme timescales as possible rather than pause or elongate the preparation of the GNLP in response to the Government's proposed planning reforms. We also support the approach that the GNLP will act as a bridge between the existing planning system and the proposed planning reforms – when and in what form they are implemented.
- 1.4 We are generally supportive of the GNLP (Pre-submission) as currently drafted but consider that some aspects of 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.
- 1.5 These representations provide comments in the order in which they appear in the GNLP; the comments have been grouped under the relevant sections of the GNLP where appropriate. We have provided comments and suggestions in relation to soundness but also where presentational adjustments/additions or further information would be beneficial to aid the Examination of the GNLP.
- 1.6 Nevertheless, we wish to emphasise the following points at the outset:
- (i) We strongly support 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 (CNTC) Vision and Spatial Strategy, and economic growth in this part of the UK relative to Cambridge and the O2C Arc, the government's priority area for global economic growth and investment;
 - (ii) We are of the view Policy 1 requires amending to properly embed the commitment expressed in Policy 7.6 to a new settlement for accommodating higher housing needs arising within the current plan period (this should specifically be referenced under the Housing text of Policy 1);
 - (iii) We consider that had the LTP and GNLP work been better aligned in terms of timescale and transport priorities, then the assessment of development options and spatial growth strategy selected might have looked very different. Most notably, development such as new settlements aligned spatially with rail as well as road connectivity; of a scale which could deliver a high degree of trip internalisation and mode shift to active travel; and

support 'first-last' mile connectivity to those sustainable transport hubs and PT networks subject to strategic infrastructure investment, would have been more favourably considered as a preferred spatial option to deliver on current plan objectives rather than being limited in this plan to an opportunity for future consideration as a longer term growth option in a local plan review;

- (iv) For the GNLP -much of which is rural - continued piecemeal 'edge developments' throughout the plan area is not the most appropriate way of creating the sustainable communities of the future, particularly when set against the whole plan objectives around net zero carbon emissions and climate change. This Plan should be much more overt in making changes to its spatial strategy to 'break this cycle' if it is to deliver on these objectives;
- (v) As part of building complementary 'clusters' along the CNTC, the CNTC Spatial Strategy already identifies the Wymondham area as one of the key nodes within the Corridor where 'development needs can be met'. There are opportunities in the Submission Plan to explicitly identify opportunities and policy support for greater spatial alignment between existing/expanding employment hubs within the Corridor and a new/expanded community such as SGV to support this economic growth, and to map these opportunities overtly on the Key Diagram;
- (vi) The consideration of new settlement options for growth in the vicinity of Wymondham presents a unique opportunity to simultaneously reinforce and strengthen the protection and mitigation given to locally sensitive features. For example, in the SGV context, considerations such as further strengthening the policy protection and releasing development pressure from the strategic gap between Wymondham and Hethersett; mitigating recreational pressure on the Lizard County Wildlife Site by the provision of a new Bays River Park to the west of SGV; and providing a new secondary school at SGV in a location which is easily accessible to the existing community of Wymondham as well as new residents, are all 'whole-town' benefits which a new settlement at SGV could unlock; and
- (vii) The sustainability credentials of the SGV proposal have already been confirmed within the GNLP Sustainability Appraisal evidence base, which concludes that SGV is the most sustainable option of the three new settlement proposals submitted to the current plan.

2.0 SILFIELD GARDEN VILLAGE PROPOSAL

Background and Engagement with GNLP to date

- 2.1 Orbit has led the promotion of Silfield Garden Village since 2018, a potential new community on land north and south of the A11 south of Wymondham in South Norfolk. The new community has been promoted at each stage of the local plan's evolution, and Orbit continues to actively promote the SGV proposal.
- 2.2 Orbit made extensive submissions to the Regulation 18c consultation in March 2020. The submission comprised of a Covering Letter; representations to the GNLP Sites Document; representations to the GNLP Sustainability Appraisal; and representations to the SGV Strategy Document, which included a suite of technical information which set out the emerging master plan thinking and demonstrated the suitability and deliverability of the SGV land for a new community.
- 2.3 The March 2020 submissions generally supported the broad principles of the draft GNLP strategy but suggested that the most sustainable way to accommodate the level and distribution of housing required to meet the ambitions and objectives of the GNLP Vision was in the form of a new settlement in the current plan, and that SGV offered the most sustainable location and growth option to achieve this. The March 2020 submissions also raised some procedural and administrative concerns, in the hope that these could be addressed through plan-making to increase the potential for the GNLP to be found sound at Examination.
- 2.4 The March 2020 submission also set out the rationale for the reconciliation of a number of land parcels at SGV which had been recorded previously as separate sites in previous GNLP consultations and sought confirmation that these were to be consolidated into a single site for the purposes of site promotion and local plan assessment purposes.
- 2.5 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 Map was accurate. The consolidated site was given the new site reference GNLP4057A, and for the purposes of site assessment was confirmed as including 6,500 residential dwellings, supporting employment, education, local centre, and green infrastructure (for a full description of the land uses included at SGV, see *Silfield Garden Village Development Prospectus* dated September 2019 submitted as part of the Regulation 18c submission).
- 2.6 As part of liaison with officers, it was confirmed that Orbit is promoting additional land to the south of the SGV proposal boundary (Site Reference: GNLP4057A) for additional strategic green infrastructure on c. 69 ha (Site Reference: GNLP4057B) and a solar farm, c.55 ha (Site Reference: GNLP4057C). These sites are to be considered as ancillary to the core SGV site, and whilst would come forward for the uses proposed as part of the wider suite of benefits of planning for a new settlement at Silfield, are not considered necessary as part of any overall site allocation to make the core SGV development acceptable or policy compliant.
- 2.7 The full suite of technical information (part of the March 2020 submission) was submitted under the site reference GNLP2168 but should now be made available under the updated site reference GNLP4057A and recorded as such in the Council's evidence base/submission material. We wish to reiterate that the full suite of SGV technical information as part of the March 2020 submission remains relevant and should factor into any new settlement work moving forwards.
- 2.8 Since the March 2020 submission, we have continued our liaison with the GNLP officer team and in response to a request for information, submitted evidence to officers in autumn 2020 that confirms the deliverability and viability of new settlement-scale growth at SGV.
- 2.9 The SGV proposal is supported by a full suite of technical information which remains up to date. Orbit welcomes the opportunity to continue to engage positively and proactively in supporting the

GNLP plan-making process and progression of thinking and evidence gathering in respect of the new settlement considerations to ensure the objective of securing a sound plan is achieved.

SGV Proposal

- 2.10 We do not seek to repeat the site-specific information submitted as part of the March 2020 submission but rather urge the relevant parties to refer to Section 2 (Site Introduction) and Section 3 (Emerging Proposal) as well as the SGV Development Prospectus (September 2019) for SGV site specific information including deliverability considerations and details regarding the SGV proposal. This information remains pertinent, and Orbit continues to promote the SGV proposal as detailed within those submissions.
- 2.11 Nevertheless, we wish to reiterate that pursuing a comprehensive approach to growth through a new settlement proposal within the Cambridge to Norwich Tech Corridor at SGV represents the most sustainable growth option to meet the Vision and objectives of the GNLP, as well as providing long-term certainty for the future growth of the GNLP area in line with recent government advice.
- 2.12 Therefore, Orbit strongly support the recognition by the GNLP that new settlement growth represents a suitable direction for future growth, as evidenced by the inclusion of draft Policy 7.6 (Preparing New Settlements) within the Regulation 19 GNLP and we offer further comment on this at paragraphs 3.104 – 3.151 below.
- 2.13 The sustainability credentials of the SGV proposal are highlighted within the Regulation 19 Sustainability Appraisal which demonstrates the SGV proposal is the most sustainable new settlement development opportunity in the GNLP area in comparison to the alternative new settlement proposals at Hethel and Honingham Thorpe (Our separate representations made on the SA, part of this submission, provide a detailed commentary on the SA site assessment). We trust that the findings of the SA will be a material consideration in the continued assembly of evidence during 2021 referred to in the supporting text of Policy 7.6.
- 2.14 Together with the technical evidence already submitted to GNLP officers for SGV over the last 12 months, the evidence base demonstrably supports SGV as the most sustainable of the new settlement options identified in the GNLP that is both viable and deliverable.
- 2.15 Orbit hopes that continued engagement on new settlement testing can move forward from this position in a timely manner to allow the new settlement work proposed to be progressed concurrently with the GNLP plan-making process and is ready to work collaboratively with the GNLP Authorities and Officers in a positive and supportive manner at the earliest opportunity.

3.0 RESPONSE TO CONSULTATION

SECTION 1 – INTRODUCTION

Transitional Arrangements and Strategic Vision

- 3.1 We support the ambition of the plan to be forward thinking and to attempt to capture the current direction of travel reflected in the *Planning White Paper* and most recent NPPF changes in terms of setting local plan policy within the context of a long-term vision for growth, the re-building of the economy and the move towards a net zero carbon emissions environment. We note that as well as shaping the context for local planning, if the target dates and objectives are to be met, many of the decisions and actions will need to take place within the time period of this local plan.
- 3.2 As a step forward towards meeting these objectives, we support both the intention and the commitment to move towards a more sustainable pattern of development within Greater Norwich, articulated through the inclusion of a new settlement policy (Policy 7.6) in the Regulation 19 Plan (*hereinafter 'Reg 19 Plan'*).
- 3.3 This supports the latest shift in NPPF draft policy, which in terms of plan-making, moves away from a need to simply "*positively seek opportunities to meet the development needs of their area*", to:

"promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects" (proposed changes to para 11a).

And that:

"Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger-scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery" (proposed changes to para 22; our emphasis).

- 3.4 Given this context, we consider that in order to be effective – both in terms of securing these objectives and meeting the Council's own new settlement delivery targets (from 2026 onwards) we suggest that some adjustment could be made to the Reg 19 plan in respect of Policy 7.6. Our representations in respect of section 5 and Policy 7.6 below provide further detail on this point.

Development Plan Documents in force for the GNDP area

- 3.5 We note that the GNLP will not replace the existing adopted Area Action Plans and that following the adoption of the Reg 19 plan, there will be a large number of separate yet overlapping DPDs making up the statutory development plan for the area.
- 3.6 Having both policy and allocations set out in a number of separate documents (with different plan periods and dates of adoption) is not unusual. However, it can cause complexities for stakeholders in assessing and coming to an informed view about the overall sustainability and environmental impact of the 'plan' in its entirety if sites are being allocated in a number of plans concurrently but not being assessed in terms of their total impact.
- 3.7 This is something that any Inspector may need to come to a view on through the Examination into the Reg 19 Plan and its accompanying SA. However, in the interim, it would be useful to aid understanding and provide clarity if Appendix 4 of the GNLP was expanded to provide a matrix/ 'progress' table of:

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- (a) the policies and allocations already adopted and what sites and developments are already committed under these policies.

 - (b) the development to be delivered under the other DPDs yet to be produced/Examined.

 - (c) what policies/sites are yet to be implemented through the AAPs.
- 3.8 In order to ensure that the full impact of the Reg 19 plan has been robustly assessed, we would welcome clarity from the GNLP as to how the cumulative SA testing of these plans with the Reg 19 plan has been undertaken.
- 3.9 Similarly, it may be worth setting out in both the plan and the Local Development Scheme (LDS) how the new settlement assessment process currently identified in paragraph 401 of the GNLP dovetails with the timescales for the various DPD adoptions (most notably, the South Norfolk Village Clusters document).

SECTION 3 - THE VISION AND OBJECTIVES FOR GREATER NORWICH

- 3.10 We support the overall principles and statements of intent set out in section 3. However, we consider that as it stands, there is a 'disconnect' between these statements of intent and the way in which the Plan proposes these are to be delivered through the identification and allocation of locations/sites for new growth to 2038.
- 3.11 Most notably, we are concerned that the GNLP decisions around the scale and nature of new growth reflected in the currently proposed allocations do not support the Council's objectives. A new settlement or garden village model has the ability to achieve the change from 'edge of settlement piecemeal growth' (that currently in the plan to 2038), to a net zero carbon emission development (the optimal way to deliver on the Council's objectives and targets); continuing the focus on 'edge growth' to 2038 will not.
- 3.12 In order to have a plan which is effective in its ability to deliver on its objectives – and therefore be found sound - we suggest that a number of adjustments could be made to the Reg 19 Plan:
- 1. *More emphasis on the Cambridge-Norwich Tech Corridor as a spatial influence and driver of sustainable growth and alignment with the GNLP spatial locations for growth***
- 3.13 We support the Plan's recognition of the role that the Cambridge Norwich Tech Corridor (CNTC) has to play, both in underpinning the Greater Norwich Vision and shaping the direction for growth and strategic development decision making. However, we consider that the plan misses the opportunity to translate the CNTC vision and objectives into site allocations (and as such, risks undermining the successful delivery of economic growth which the CNTC Vision advocates).
- 3.14 Since the publication of the Reg 18 Plan, a *Vision for the Tech Corridor* has been published (July 2020) which includes a spatial strategy for the Corridor¹. We consider that the Reg 19 Plan could be updated and strengthened in terms of its alignment with the government's direction of travel on plan-making by placing the Tech Corridor Spatial Strategy - effectively, a 'strategic Vision' for the area as sought by the 2021 NPPF changes - more front and centre within the Part 1 Plan in terms of how this has and will continue to shape both strategy and spatial growth decisions.
- 3.15 Alignment of the GNLP growth strategy more closely with the CNTC Vision and spatial strategy will also enhance the opportunity to lever-in increased public sector investment over the life of the Plan.
- 3.16 Specifically, for the consideration of new settlement-scale growth – consideration of which cannot be done in isolation from decisions on other growth allocations and policies in the plan – embedding the CNTC spatial strategy and the objectives therein more firmly and overtly within the Reg 19 plan would provide an additional degree of robustness and resilience to the current plan.
- 3.17 There are a number of specific objectives set out within the CNTC Vision with which a new settlement at SGV would be uniquely aligned. Some of these are referenced in Table 1 below:

¹ https://www.techcorridor.co.uk/wp-content/uploads/2020/11/CNTCMarketingReport_v202011_LR.pdf

Table 1: CNTC Vision – SGV Proposal

Relevant CNTC Spatial Vision and Strategy Objectives	Alignment with SGV Proposal (as set out in SGV Development Prospectus Sept 2019)
<p><i>"Independent of their current status or performance level, the [rail] stations provide a platform to improve and grow connectivity and support mixed-use developments". (pp25)</i></p> <p>The Vision advocates focusing on <i>"existing fixed mobility hubs (principally stations) for sustainable future growth...[Plans should] Identify opportunities for new mobility solutions that supplement and support existing locations particularly in last mile connections". (pp87)</i></p> <p><i>"By aligning commercial and residential growth around existing sustainable modes of transport, the Tech Corridor aims to build a future-proof economy and provide diversity in terms of job opportunities, commercial space, and places to live" (pp31)</i></p> <p><i>[Plans should] Focus on existing [economic] assets and development of their potential by identifying opportunities to enhance their offer and support their future growth and resilience. Use housing allocation as a tool to support sustainable asset growth. (pp87)</i></p>	<p>SGV location is the only GV option within direct active travel distance of Wymondham station (<2km from the centre of SGV to the rail station along a direct route proposed as a greenway prioritising PT and active travel modes, with key destinations such as the new secondary school less than a kilometre from the existing station). On this basis, first-last mile travel by sustainable and active travel means can be prioritised at SGV from the outset, to maximise walking and cycling as the preferred mode of travel for short trips for daily activities – one of the most equitable ways to reduce carbon emissions for both existing and new communities.</p> <p>SGV is a mixed-use development which includes new employment land in a location attractive to the market together with other job opportunities at the facilities and services on site to support the new homes on site.</p> <p>Importantly in the context of the CNTC Spatial Vision, rather than being predicated on a 'spatially standalone' model remote (and thus competing with existing communities in terms of benefits and investment), the SGV proposal has considered how its design and development can unlock 'whole-town' benefits for Wymondham (see paras 3.89 – 3.97 below and SGV Development Prospectus for more detail).</p>
<p><i>"Significant residential developments are planned in the Tech Corridor responding to affordability needs of the main cities. More important is the balanced inclusion of commercial space within these planned areas to facilitate work-life balanced environments, reduce the need to commute, and maintain or improve quality of life of the Tech Corridor's community". (pp 69)</i></p> <p><i>"Facilitate space for [economic] growth around successful industries and research locations and develop a supporting network of grow-on space within cities and towns" (pp 87).</i></p>	<p>The "balanced inclusion" of employment as well as residential development at SGV has been carefully planned so as to reduce the need to commute and facilitate a better work-life balance. Importantly, the level and location of the employment land proposed is designed to complement rather than compete with existing employment hubs at NRP and Hethel (locations where the Spatial Vision suggests space for future economic growth should be facilitated).</p> <p>In our view, in the context of delivering the CNTC spatial vision objectives to 2050 would best be achieved by pursuing a growth strategy which allocates a Garden Village at Silfield specifically designed to complement the established and growing economic offer in the area, by (1) supporting the key economic hub of NRP and (2) futureproofing the existing employment node around Hethel (supporting future jobs growth in and around the HEC whilst safeguarding and enhancing the existing motorsports facilities).</p>

Relevant CNTC Spatial Vision and Strategy Objectives	Alignment with SGV Proposal (as set out in SGV Development Prospectus Sept 2019)
	This approach to strategic growth planning aligns absolutely with the overarching objectives of the CNTC Vision and taken as a whole would create and deliver one of the “ complementing clusters ” identified within the Spatial Strategy diagram on pp. 88 of the Vision document.
<p>"Spatial Strategy for 11. Wymondham: 'Provide development needs' (pp88-9)</p> <p><i>"Increase the offer of flexible expansion spaces for industries to grow and stay, retaining talent.</i></p> <p><i>Mobility schemes to improve commuting between companies, clusters and into Norwich".</i></p>	<p>The SGV proposal includes around 15 ha of dedicated employment land specifically designed to accommodate well-connected flexible expansion space for businesses looking to grow and stay in the area.</p> <p>Direct access to the A11 from a new junction within SGV will support enhanced mobility for all modes including PT into Norwich via NPR. Moreover, direct access to Wymondham Station from SGV will transform the shift to rail/PT commuting both eastwards to Norwich and westwards to other nodes in the Corridor.</p>

- 3.18 We consider that alignment with the CNTC Spatial Vision is particularly important for the GNLP in the context of the current 'transitional planning' and the proposed changes to paragraph 22 of the NPPF in respect of setting LP policies within a 30-year vision. Indeed, this point is already recognised in para 4 of the GNLP, which states:

*"This [Reg 19] plan has been prepared under transitional arrangements ahead of the implementation of the new system for plan-making Government has committed to introducing. It is highly likely that the GNLP will be superseded by a subsequent local plan produced under the new planning system within a very few years of its adoption. **Therefore, the GNLP will play a key role in guiding the transition to the new planning system, helping to ensure sustainable housing and jobs growth in Greater Norwich**". (our emphasis)*

2. Strengthening the GNLP policy framework to ensure a move to more sustainable transport modes and climate-resilient growth.

- 3.19 We note the statement of intent in para 138 (Infrastructure) that "By 2038 our transport system will be enhanced by a combination of infrastructure improvements and new technologies...and road improvements to the A11, A47, the Norwich Western Link and the A140", and the emphasis placed on a combined transport strategy through the recognition that this will include "better rail services to London, Cambridge, Stansted, Milton Keynes, Oxford and the West".
- 3.20 However, we consider that the Vision is overly passive with regard to objectives around a move to sustainable travel, and how this could best be achieved through the spatial choices around new growth. Specifically, the identified planned improvements in rail services do not form a focus for the spatial growth strategy selected. Whilst it is stated that infrastructure improvements and new technologies "will provide greater travel choices and allow people to make the best use of evolving sustainable transport networks" (para 139), the Infrastructure objective under para 151 does not include any reference to how new growth can be planned to realise benefits to both existing and new communities arising from improvements to sustainable transport infrastructure and services.
- 3.21 There is no objective or requirement in Section 3 for new development to be located close or with good access to the rail network/stations, for example. Furthermore, the single paragraph setting

out how the GNDP will deliver its Vision to 2038 (para 144) does not include any reference to spatial decision-making in terms of how choices around the location or scale of new growth can drive forward the Vision.

3. More Proactive Planning for a New Settlement

3.22 The desire to explore the potential for new settlement or garden village scale growth has been one of the growth options included in the GNLP since its inception. A number of options for a new settlement were put forward through the Call for Sites process and have already been assessed (and reassessed) through the SA activity for a new settlement scale of development as part of the Plan's evidence base.

3.23 However, para 168 of the Reg 18 Draft Plan (Consultation Version Jan 2020) stated that:

"No new settlement is proposed at this time as a significant proportion of the allocated sites are strategic scale commitments of 1,000 homes plus and the establishment of any new settlement is likely to take a long time. However, three new settlement sites have been proposed (at Honingham Thorpe, Hethel and Silfield). The longer-term development of a new settlement could be a suitable option in the future. This should be considered in the next review of this plan".

3.24 It is important to note that a new settlement appears to have been rejected at Reg 18 stage not as an inappropriate spatial development option in itself, or because a new settlement is not needed, but because there appears to be a concern that allocating new development in a new settlement together with the strategic sites already underway would result in an unacceptable risk to the delivery of new homes to 2038.

3.25 We are therefore heartened to see a re-emergence of the contribution that a new settlement can make to the growth strategy of the GN area with the inclusion in the Reg 19 plan in Section 5 of the Plan of paras 165 and 166 which state:

"This local plan also provides a "direction of travel" for the longer term by identifying opportunities for growth which could be taken forward to meet additional needs in the next local plan. A significant part of this long-term need is likely to be met in a future plan through the development of new settlements (see policy 7.6).

The GNLP therefore provides the strategic framework to give the clarity on where growth on [sic] Greater Norwich is sustainable ahead of the implementation of the new planning system the Government is promoting".

3.26 However, given that:

(a) the 'next local plan' is likely to come forward within "a very few years" (para 4 of the GNLP refers);

(b) the GNDP expect the new settlement to deliver by 2026 [add ref]; and

(c) the need to ensure that the current plan growth strategy and policies do not act counter to or prejudice the consideration or delivery of new settlement(s).

3.27 We consider that firmer policy support for a new settlement than that currently provided for by Policy 7.6 should be included in the Plan, in both the Vision and Objectives section, and in Policy 7.6 itself.

3.28 On the basis of our commentary above, we suggest that in order to strengthen the soundness of the Plan in relation to how its Vision and Objectives have influenced – and will be delivered through – new growth locations, the following adjustments should be made to section 3:

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- (i) In respect of the overarching Vision text, an addition to para 124 to read: **"world class knowledge intensive jobs and sustainable new communities to support these jobs in the Cambridge Norwich Tech Corridor"**; and

a re-wording of para 125 to read:

"As a result, by 2038 Greater Norwich will have vibrant, healthy, inclusive and growing communities supported by the delivery of new homes and infrastructure, a move to less travel and/or more sustainable patterns of movement, and an enhanced environment. Growth will make the best of Greater Norwich's distinct built, natural and historic assets, as well as supporting and supplementing committed government investment in strategic infrastructure improvements";

- (ii) In respect of Communities, a new para after para 132 to read:

"Underpinning our commitment to move to net zero carbon emissions through more sustainable development forms and sustainable patterns of movement, (and as part of effective plan making under the transitional arrangements) we will have committed to the principle of a new settlement within the Cambridge Norwich Tech Corridor to help meet the housing and economic growth needs of the GNLP area towards the end of this plan period and beyond".

- (iii) In respect of Infrastructure, an addition to the first part of para 139 to read:

"These improvements will shape the location and nature of new settlement-scale growth, supporting proposals which embed sustainable 'first-last mile' travel within spatial planning and design to secure a step change in accessibility to and use of improved rail /PT services to Norwich and other economic centres, as well as planning for a degree of self-containment to secure a reduction in the need to travel. Together these will reduce the overall need to travel, provide greater travel choices and allow people to make the best use of evolving sustainable transport networks, particularly in the urban area. They will also continue to support Norwich's role as the regional capital and improve access to our rural areas.

- (iv) In relation to Delivery, an addition to para 144, to read:

"We will achieve our vision for sustainable and inclusive growth which meets our net zero carbon emission objectives as well as our housing and economic growth needs by a combination of working proactively with our partners to deliver development on our currently-committed sites, and moving swiftly to the identification, allocation and consenting of a sustainable new settlement capable of delivering growth by 2026. by a variety of means.

We will also adopt a ~~These include our~~ proactive approach to co-ordinating development providers, organisations and agencies as well as through interventions in cases where the market cannot deliver infrastructure. The protection and enhancement of a high-quality environment will also have assisted delivery by attracting inward investment. Our GNLP will meet housing need by providing choice and flexibility so that homes will be delivered on allocated and windfall⁵¹ housing sites".

3.29 These adjustments should also be carried forward into the text of paragraph 151 in respect of the Plan Objectives.

SECTION 4 –THE DELIVERY OF GROWTH AND ADDRESSING CLIMATE CHANGE

- 3.30 We have no comments to make on the Delivery of Growth section of the plan, other than to say that the delivery statement is clearly geared towards a continuation of the status quo in terms of current activity of the GNDP.
- 3.31 If the ambitions of the Plan are to be realised and a meaningful shift towards sustainable and net zero carbon emission futures is to be secured by 2050, then a new approach to more proactive plan-making and delivery could be adopted, which embraces more effective public-private partnership working and driving forward measures to combat existing carbon-hungry activity as well as shifting from edge of settlement growth towards new strategic patterns of growth and infrastructure focused on increased self-containment to reduce overall trips and building-in of green energy and active travel from the outset.
- 3.32 Including a commitment to SGV in the Submission Plan would enable this shift to be made in the timescales for the move to net zero carbon emissions required by GNDP without having an adverse effect on delivery of new homes within the plan.

Addressing Climate Change

- 3.33 We support the GNLP's ambition to address climate change and shift to a post-carbon economy. We do, however, strongly believe that aligning growth spatially with committed strategic infrastructure improvements and delivering holistically planned growth by way of a new settlement presents the best opportunity to achieve these ambitions both within the current plan period and beyond as opposed to the range of sites of varying sizes that do not present a coherent approach to addressing the ambition of a net zero carbon emissions growth plan.
- 3.34 The addition of policy 7.6 (Preparing New Settlements) makes a good start towards achieving these objectives and delivering effective outcomes, and we welcome the inclusion of this policy within the Reg 19 Plan. However, we are concerned on two counts that Policy 7.6 in isolation will not result in the progress towards net zero carbon emissions sought by GNDP and local stakeholders by 2038:
- (i) By neglecting to include a criteria-based policy in this plan governing the ambition, nature, and scale of a new settlement as part of Policy 7.6, it risks the effective delivery of a new settlement in the timescales sought through said policy; and
 - (ii) By continuing the allocation of a significant proportion of the housing growth to 2038 through edge-of-settlement and large village allocations (some identified as sites in the plan, but with a substantial number of dwellings (2,496) as yet unidentified and as such any impact unknown), established and unsustainable patterns of travel will be perpetuated if not increased, and the limited scale of individual sites will fail to deliver the full suite of green, grey, blue and social infrastructure improvements needed to meet aspects of the move to net zero carbon emissions, carbon offsetting and biodiversity net gain.
- 3.35 In contrast, the SGV proposal as set out in the *SGV Development Prospectus* (September 2019) submitted as part of the Regulation 18c submissions have designed-in measures to deliver on the climate change objectives and would provide a much more certain route to delivery of the measures and outcomes set out in the GNLP Climate Change Statement in Table 5 of the GNLP.
- 3.36 The sustainability credentials of the SGV proposal have been reflected within the GNLP Sustainability Appraisal evidence base, which concludes that SGV is the most sustainable option of the three new settlement proposals submitted to the current plan. Orbit have submitted a separate detailed commentary on the Sustainability Appraisal as part of the Reg 19 representation.

- 3.37 On the basis of the evidence presented in support of the GNLP, it is therefore difficult to conclude that the spatial strategy and site allocations proposed within the Reg 19 Plan will deliver on the LP objectives in respect of climate change between now and 2038; and indeed, failure to address this issue could exacerbate the current situation, playing against the overall climate change objectives of the plan and jeopardising its soundness.

SECTION 5 - THE STRATEGY

- 3.38 We support the thrust of Section 5 and welcome the clear intention behind Policies 1- 6 in terms of translating the objectives of the GNLP into development allocations.
- 3.39 However, we remain unconvinced of the logic between the objectives and statements of intent within Section 5 and the proposed spread and nature of development allocations made in the plan. A number of these allocations – including strategic sites - are allocations/commitments carried forward from previous plans which for a variety of reasons have failed to deliver the development needed. Similarly, the spread of development sites across the GNLP area owes more to the rolling forward of the previous three separate local plan policies and allocations than the realisation of the stated intention in the GNLP to secure a step change towards a more sustainable spatial strategy which captures the benefits of access to sustainable travel and secures net zero carbon emission development forms.
- 3.40 We welcome the Councils' review of housing requirements and employment growth likely to result from ongoing investment and growth plans in Greater Norwich but have some concerns over the justification for the figures settled upon in the Reg 19 Plan (our representation on each policy provides more detailed commentary).
- 3.41 The following comments are made in this context.

Policy 1 - The Sustainable Growth Strategy

- 3.42 Whilst we support the thrust of Policy 1 and its supporting text, we consider that the amendments to Policy 1 proposed in the Reg 19 plan fail to address a number of key issues:
- (a) Ensuring housing need is fully aligned with economic growth ambitions;
 - (b) Properly embedding the commitment expressed in Policy 7.6 to a new settlement for accommodating higher housing needs arising within the current plan period (this should specifically be referenced under the Housing text of Policy 1); and
 - (c) Failing to provide sufficient certainty and clarity by identifying within Policy 1 and the Key Diagram a preferred spatial growth area within which any new settlement could come forward.

(a) Commentary on Policy 1 Housing Requirement

- 3.43 We support the recognition in the Reg 19 Plan that there is a need to increase the identified housing requirement by c 5,000 homes above that originally proposed in the Reg 18 (c) Plan. However, we make a number of observations about how this figure was arrived at, and the robustness of the evidence underpinning its justification.
- 3.44 Orbit commissioned Turley to undertake a technical review of Housing Needs in Greater Norwich as part of the Reg 18 submission for SGV. Turley have provided an update to this review in support of these representations (see Appendix 1: *Update to the Technical Review of Housing Needs in Greater Norwich*, Turley March 2021) and we offer the following commentary on the housing requirement:
- i. As in the previous iteration last year, the GNLP continues to acknowledge a need for 2,027 dwellings per annum throughout Greater Norwich over the plan period (2018-38). This reflects the 'minimum' need derived from the standard method as of the base year, where its recent evolution – announced in December – does not affect this area. This is around 10% below the average rate of housing delivery over the past five years;

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- ii. The Councils do, however, propose a requirement that is around 22% higher than the minimum need at around 2,475 dwellings per annum, or 49,492 homes in total (the latter being approximately 5,000 more homes than originally proposed in the 2020 Reg 19 plan). Such a buffer is required by national policy to protect against delays or non-delivery of future supply, but the Councils have confusingly suggested that this buffer also responds to – and is at least partially justified by – demographic evidence of a greater housing need than implied as a minimum by the standard method;
- iii. While the acknowledgement of this evidence is welcomed, having been highlighted in our previous submissions last year, disappointingly the Councils appear to have made no attempt to quantify or robustly substantiate the actual scale of this higher need. This provides inadequate assurance that the proposed requirement is sufficient to meet housing needs in full *and* contains an appropriate buffer to separately guard against risks to supply.
- 3.45 On the basis of the above analysis, we suggest that the Councils may wish to rectify this situation prior to the submission of the GNLP Plan by preparing a robust Housing and Economic Needs Assessment, to comply with national guidance and clarify the number of homes that are actually likely to be needed in Greater Norwich where this appears likely to – and is clearly allowed to – exceed the outcome of the standard method.
- 3.46 This process should involve an up-to-date assessment of the employment growth likely to result from ongoing investment and growth plans throughout Greater Norwich. This assessment is unfortunately absent from the recently published Addendum to the Employment Land Assessment, which relies on a baseline forecast from Experian that unusually assumes minimal job growth beyond 2022. While the authors do proceed to adjust this forecast in developing an ‘alternative growth scenario’ – ostensibly accounting for the City Deal, the opportunities associated with the emerging Tech Corridor and other economic assets – the approach taken appears grounded in national rather than local evidence and adds less than 500 extra jobs to the baseline over eighteen years to 2038.
- 3.47 This would represent a poor return on investment, especially where Greater Norwich has recently proven to be extremely successful in translating investment into new jobs. Furthermore, other strands of the GNLP apparently aim to sustain this success, in proposing to allocate over four times the employment land implied to be needed to accommodate the ‘alternative growth scenario’ for example. This is likely to require a parallel increase in housing provision, to ensure that investment is not constrained by a lack of available or suitable labour.
- 3.48 In our view, the extent of the economic ambition, and the opportunities presented by planned investment, mean that housing need can be reasonably expected to rise over the plan period. Indeed, the Reg 19 Plan acknowledges this prospect in the supporting justification for Policy 7.6, which sets out the Councils’ conviction that one or more new settlements will be required to address housing needs in the future².

(b) Omission of New Settlement within the Current Growth Strategy in Policy 1

- 3.49 The technical analysis undertaken by Turley on housing requirements (see Appendix 1 to these representations) supports the view that the Councils should take a more proactive and positive approach to planning for the realisation of new settlement development.
- 3.50 Where the Councils recognise that the lead-in time for new settlements spans a number of years, in order for such a new settlement or settlements to contribute to meet rising needs in the short-medium term there is a strong rationale for the GNLP to provide a firmer commitment to their role. This recognises specifically the expectation set out in the Reg 19 Plan that a new

² Draft Plan (2021), paragraph 395.

settlement(s) will start delivering from 2026³, which would fall within the timeframe of the current Local Plan prior to a review which may follow up to five years after its adoption.

- 3.51 Planning for a new settlement within the current GNLP will ensure a greater level of resilience in the supply of new homes over the medium-long term. It is noted that the Councils' proposed supply of housing land substantively relies on both windfalls (1,296) and the parallel realisation of the South Norfolk Village Clusters Housing Site Allocations Local Plan for example (relying on a minimum of an additional 1,200 allocations). The provision of homes through these routes - as opposed to allocations within the Plan itself - is subject to greater uncertainty (and therefore risks undermining the soundness of the Plan as well as diluting the ability of the Plan to deliver well planned climate-resilient and more sustainable patterns of development), whereas the identification of a new settlement with a clear phased trajectory will offer an important mitigation measure and provide better certainty over additional growth within and beyond the plan period.
- 3.52 On this basis, we consider that Policy 1 would benefit from the inclusion of a para under the Settlement Hierarchy to reference the commitment to a new settlement to meet additional housing needs within the Plan period.

(c) Preferred Spatial Location for a New Settlement as part of the Sustainable Growth Strategy

- 3.53 Many of the points made earlier in these representations refer to the need to redress the disconnect between the Vision and objectives of the GNLP, and the selection of locations and sites for growth.
- 3.54 We welcome the recognition in the GNLP that strategic growth drivers for the Greater Norwich area are already in place, and that within the Plan area, the CNTC is already identified as the Strategic Growth Area on the Key Diagram. It is unequivocal that the CNTC will be the focus for growth and infrastructure investment to 2050, to continue the eastwards momentum established by the O2C Arc and associated strategic transport investment.
- 3.55 If the GNLP is to be effective in making the shift to a net zero carbon emission growth and development strategy by 2038 (required to deliver 2050 targets), then it is considered that, as a minimum, this Plan must make clear the preferred growth locations within the Strategic Growth Area which strategic planned growth is to occur over the next 30 years⁴. This includes both new settlement-scale growth, strategic employment growth and indeed, strategic green infrastructure investment – one cannot effectively be planned without the others.
- 3.56 As part of building complementary 'clusters' along the CNTC, the CNTC Spatial Strategy already identifies the Wymondham area as one of the key places within the Corridor where 'development needs can be met'⁵. Following the publication of the Spatial Strategy, there are opportunities in the Submission Plan to explicitly identify opportunities and policy support for greater spatial alignment between existing/expanding employment hubs within the Corridor - such as Norwich Research Park and Hethel Engineering Centre - and new/expanded communities such as SGV to support this economic growth, and to map these on the Key Diagram accordingly.
- 3.57 For the GNLP -much of which is rural - continued piecemeal 'edge developments' throughout the plan area is not the most appropriate way of creating the sustainable communities of the future, and for the Plan to remain silent on how and when the spatial strategy will 'break this cycle' is not effective plan-making.

³ *Ibid*, paragraph 401.

⁴ *NPPF Proposed Changes paragraph 22 (January – March 2021 consultation).*

⁵ *CNTC Vision and Spatial Strategy July 2020 pg. 88.*

- 3.58 Therefore, expanding Policy 1 to include within its spatial strategy more specificity about what a 'sustainable community' might constitute at a strategic scale would be helpful in guiding decisions about the criteria for new settlements, decisions for which will need to be taken in the next 2 years if the Councils delivery programme is to be met.

Policy 2 - Sustainable Communities

- 3.59 We have no objection to the thrust of Policy 2 as it stands, other than to observe that there is much duplication of national policy within the supporting text, and it may be more effective to simply cross reference to the relevant parts of the NPPF rather than replicate commentary or requirements.
- 3.60 We welcome the approach to identifying area-specific requirements within Policy 2 – such as for the GNLP area, the focus on support for free standing decentralised, renewable and/or local carbon energy networks, providing energy supplies close to customers, especially when these can be designed as an integral part of development proposals. It should be noted that the SGV proposal includes such provision through a solar farm as an integral part of its wider 'designed-in' net zero carbon emission and green infrastructure provision. Only developments of the scale of a GV will deliver such sustainable development. Piecemeal edge developments will not comprise sufficient critical mass to do so.

Policy 3 - Environmental Protection and Enhancement

- 3.61 We have no objection to the objectives and general thrust of Policy 3. However, it would be helpful if further clarity could be provided in the submission version of the Plan on the following:

- (a) We support the reference to the use of tools such as the DEFRA Biodiversity Metric to demonstrate how biodiversity net gain (BNG) can be achieved on development sites (para 212). We also note that the background evidence base (the final paragraph of section 4 of the GNLP GI Study Report) recommends that "*All developments will be expected to use a biodiversity metric that will assess the negative impacts on habitats arising from a development and calculating [sic] how much new or restored habitat, and of what types is required to deliver sufficient net gain*".

Given that the background evidence advocates a site-specific approach to calculating and delivering BNG – an approach which we recognise and support - it is unclear how the policy requirement set out in para 213 (and replicated in the text of Policy 2) that "*any such gain needs to be significant in order to be credible which is why the policy requires a gain of at least 10% greater than the existing situation*" has come about and can be justified. We would welcome clarification on this point.

- (b) The justification for the district wide policy requirement set out in para 220 for a 'per dwelling' contribution of £205 towards direct measures to mitigate the increased recreational/visitor pressure on protected sites within the GN area. Firstly, it is noted that the evidence base suggests a figure of £185.93 per dwelling (Norfolk GI RAMS Strategy, Place Services March 2021), so it would be helpful to clarify the disparity between the two figures.

More importantly, in our experience, designing-in and delivering on-site mitigation close to the source of the impact as part of new strategic development is a more effective and deliverable alternative which will achieve the desired objective more quickly and effectively than making many smaller contributions to a district-wide 'pot' of funding which might take years to secure sufficient funding to deliver meaningful outcomes. As such, reference should be made in the last para of policy 3 to the ability for strategic development sites such as large scale new/expanded settlements to design-in the equivalent recreational

mitigation measures as part of the green infrastructure provision on site. As an example, the SGV proposal includes the proposition of strategic green infrastructure (including a Bays River Park to the west of the garden village) specifically designed to divert recreational activity away from the Lizard SSSI, an area already subject to existing visitor pressure.

Therefore, we consider Policy 3 should be adjusted to include an additional bullet point to allow for the ability to deliver on-site mitigation in response to locationally-specific identified impacts as an alternative to a 'per dwelling' contributions to finance mitigation measures which in practice could be a considerable distance away from the resident population.

Policy 4 – Strategic Infrastructure / Appendix 1: Infrastructure Requirements

- 3.62 We support the general principles of Policy 4 and contents of Appendix 1. In particular, we welcome the emphasis in para 231 placed on the NPPF requirement that "transport should be considered from the earliest stages of plan making, to address the potential impacts of development, take advantage of existing and proposed infrastructure and new technology and promote public transport, walking and cycling. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. It also recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas" (our emphasis).

Transport Evidence Base

- 3.63 However, in our view the evolution of the GNLP – and the selection of development sites - has not 'considered transport from the earliest stages of plan-making', particularly in respect of the choices around the location of new growth which can limit the need to travel or providing a genuine choice of sustainable transport options.
- 3.64 This is borne out by the commentary in para 237, which states that "Local transport strategy for the Norwich area is shaped by Norfolk County Council's third local transport plan (2011) and the Norwich Area Transportation Strategy (2013) (NATS)". These documents are considerably out of date for the purposes of shaping the GNLP to 2038, particularly in respect of the GNDP net zero carbon emissions target to 2050. This presents a serious risk to the soundness of the plan.
- 3.65 It is therefore somewhat concerning that work on updating the background transport evidence to support the GNLP is only now underway, and will only cover the period 2020-2036, two years short of the current local plan period.
- 3.66 Para 237 confirms this position, stating that the "fourth local transport plan (LTP4) is being progressed and a draft consulted on. The plan will then be reviewed and approved by full council in Spring 2021 with a full Implementation Action Plan to be developed and approved later in 2021. Work is also underway to review of NATS, known as the Transport for Norwich Strategy (TfN). A preferred strategy will be consulted on in 2021. LTP4 and TfN are being prepared alongside the GNLP" (our emphasis). Furthermore, we understand that no transport modelling of the proposed LP growth has been completed and published as part of the LP evidence base.
- 3.67 It is clear from the programme and lack of up-to-date transport planning and assessment that there is a disconnect between the GNLP climate change ambitions in terms of reducing emissions from car borne travel – including the strategy and selection of development sites to help meet these targets - and the local transport policy framework underpinning investment priorities for sustainable transport infrastructure to deliver on these ambitions. Despite the policy wording in Policy 4 that transport improvements will "support the provision of sustainable and active transport", it is evident from paras 239-241 that there remains a clear emphasis on funding improvements to the strategic and local road network.

- 3.68 We consider that had the LTP and GNLP work been better aligned in terms of timescale and transport priorities, then the assessment of development options and spatial growth strategy selected might have looked very different. Most notably, development such as new settlements aligned spatially with rail as well as road connectivity; of a scale which could deliver a high degree of trip internalisation and mode shift to active travel; and support 'first-last' mile connectivity to those sustainable transport hubs and PT networks subject to strategic infrastructure investment, would have been more favourably considered as a preferred spatial option to deliver on current plan requirements rather than being limited in this plan to being an opportunity for longer term growth in the local plan review.
- 3.69 There remains an opportunity between now and the submission of the Plan to rectify the disconnect between sustainable transport and spatial growth planning, by engaging with the County Council and other statutory transport providers to align priorities, not only in respect of a pathway to achieving net zero carbon emissions target, but also in securing meaningful progress on mode shift, active travel and sustainable first last mile travel as part of planning for new settlement scale growth to meet additional development needs both during and beyond the plan period. We would welcome dialogue with the GNLP and NCC on this matter as part of further reinforcing the robustness of the LP evidence base prior to Examination.

Scope of Further Investigation

- 3.70 In the interim, we note the intention to update Appendix 1 to support the Reg 19 Plan (it is assumed from the wording in the introduction to Appendix 1 that this has not yet been done). As part of ensuring the Councils continue to work effectively with statutory agencies to produce a robust evidence base upon which to justify local plan growth proposals at Examination, we suggest that the list of currently identified road junctions for further investigation with Highways England (set out in Appendix 1, on page 122 of the Reg 19 Plan) is expanded. As a minimum, this should include a commitment to further investigation of opportunities to enhance the role, function and efficiency of the A11 Corridor as the principal movement corridor within the Cambridge Norwich Tech Corridor, including its ability to support integration with the Cambridge-Norwich rail network (crossings, stations and priority PT routes) as part of new growth options aligned with the commitment to the Vision and growth ambitions of the Corridor.
- 3.71 The scope of the investigation should be sufficiently broad and include opportunities to introduce enhanced 'smart' travel and PT measures along the A11 corridor, as well as opportunities for 'first-last mile' sustainable and active travel from key transport hubs such as rail stations within the Tech Corridor area. The investigation of the A11 corridor should be a joint commitment between Highways England, the GNLP Authorities and other relevant statutory agencies.
- 3.72 In addition, the commitment to future new settlement growth in the GNLP area presents a unique opportunity to 'design-in' new and/or strategic infrastructure improvements beyond the scale possible through previous existing settlement "bolt-on" growth strategies. Therefore, an opportunity exists to undertake further A11 corridor investigation aligned with the preparation of new settlement work as proposed within draft Policy 7.6 (Preparing for New Settlements). The investigation work will provide a valuable source of information that is likely to play a critical role in the selection of a new settlement proposal(s) to secure the long-term certainty for future growth of the GNLP area.

Policy 5 – Homes

- 3.73 As currently drafted Policy 5 requires developments of 40 dwellings or more to provide at least 5% of plots as serviced self/custom-build plots unless a lack of need for such plots can be demonstrated or plots have been marketed for 12-months and have not been sold.
- 3.74 We support the principle of inclusion of the requirement for serviced self/custom-build plots and are of the view they can play an important role in the place-making of new developments. We

support the majority of the policy wording as currently drafted, particularly as it is sufficiently broad to allow the delivery of the serviced plots to come forward as part of phases on strategic developments and ensures there is a backstop date of 12-months so as not to jeopardise the delivery of traditional market and affordable housing on strategic sites. These provisions are sensible and represent a sound approach to plan-making.

- 3.75 Particularly in respect of new settlement-scale growth, innovative forms of housing tenure, type and delivery – including custom/self-build (CSB) and MMC – form an integral part of the overall offer. The masterplan for the SGV proposal has been developed to provide sufficient flexibility for all housing types including CSB plots and any future models of innovative and low carbon housing delivery that may come to fruition within the delivery period of SGV.
- 3.76 Despite this, we are concerned the evidence base for the GNLP does not provide sufficient evidence to support the 5% policy requirement, which in turn may risk the policy failing the tests of soundness. At the time of this submission the GNLP evidence base does not include any housing needs assessment, or equivalent, nor is there any record of the self-build and custom housebuilding register for the GNLP area to align the 5% requirement with the underlying demand evidence. We suggest that GNLP may wish to rectify this in the period to submission of the plan.
- 3.77 Each of the GNLP Authorities are bound by legislation (*The Self-build and Custom Housebuilding Act 2015*) to keep a registration of the individuals and associations of individuals who are seeking to acquire serviced plots. Therefore, it should be relatively easy to compile the individual registers of the GNLP Authorities to create a composite register for the GNLP area.
- 3.78 In tandem, we suggest the Dec 2020 Viability Assessment is amended to take account of the policy 5% requirement for serviced self/custom-housing plots to ensure the ambition is sufficiently assessed prior to the submission of the GNLP and consideration at Examination.

Policy 6 - The Economy (Including Retail)

- 3.79 We support Policy 6 and the objectives it seeks to achieve. As currently written, we have no concerns with respects to the soundness of the policy.
- 3.80 However, we are of the view that Policy 6 fails to capitalise on the opportunity to further support and direct employment growth to the CNTC.
- 3.81 The CNTC seeks to "...deliver growth that adds true value to both the economy and to society" by "...creating the right opportunities, environment, ambition and visibility needed for our highest potential assets to flourish."⁶
- 3.82 The current focus of Policy 6 is to ensure sufficient employment land is available throughout the Plan period. Whilst this is a sound approach it does not go far enough to create the right opportunities and environment the CNTC requires to achieve its ambitions.
- 3.83 The GNLP seeks to direct the future growth of the GNLP area up to 2038, therefore, the policy should look beyond meeting short term needs and set policy objectives to ensure it is aligned with the ambitions and objectives of the CNTC.
- 3.84 At present, there is no mention of the CNTC in Policy 6. We suggest that for soundness, an additional policy objective should be added to the first part of Policy 6, to read:

"7. The GNLP is supportive of the objective and ambitions of the Cambridge-Norwich Tech Corridor and will encourage opportunities for new economic growth which

⁶ *The Cambridge Norwich Tech Corridor prospectus (October 2020), pg. 20.*

are consistent with these ambitions⁷. Development proposals which deliver the aims and ambitions of the CNTC whilst at the same time meeting other key GNLP criteria will be supported, subject to the other policy requirements of this Plan.

Policy 7.1 - The Norwich Urban Area including the fringe parishes

- 3.85 Whilst we wholly support the focus on Norwich as the regional centre for growth, regeneration and brownfield redevelopment, we are conscious that because of the rollover of a number of previously allocated development sites – including strategic urban extensions in and around the Growth Triangle now totalling 13,500 new homes – *"almost half the housing growth and the majority of the strategic employment areas"* (para 338) are located in this area.
- 3.86 This undoubtedly poses a risk to the overall deliverability and soundness of the Plan - not just in terms of delivering development on the ground, but also in terms of a shift from a continuation of the 'status quo' to a more sustainable, net zero carbon emission spatial growth plan which complements and supports the regional priority now being given to the CNTC.
- 3.87 We understand that existing allocations are being progressed and funding is being put in place to unlock the market failure to deliver the requisite infrastructure needed to make this growth deliverable.
- 3.88 Whilst we do not suggest that there is evidence to require the authority to make a wholesale move away from these established development allocations, what this does suggest is that the Plan should be more resilient in terms of putting measures in place to mitigate any continuation of non-delivery or stalled sites and over-reliance on public sector intervention to remedy market failure.
- 3.89 Rather than allocating contingency sites (such as that at Costessey) which being strategic in nature but located in 'edge of settlement' areas, perpetuate a continuation of ever-increasing and less sustainable patterns/modes of travel back to key centres, the GNDP could be more proactive in creating a resilient plan by putting in place a supportive policy framework to favourably consider a new settlement allocation during the first part of the plan period. Our representation in respect of Policy 7.6 provides more detail.

Policy 7.2 - The Main Towns

- 3.90 We support Policy 7.2 as currently drafted in respect of the spatial strategy decision to limit further piecemeal 'edge' growth of Wymondham whilst the balance of the existing commitments allocated through the AAP are constructed. The decision in the Reg 19 Plan to allocate only a small number of additional residential dwellings at Wymondham and no contingency allocations (para 181 refers), is supported: this is a sound approach which will allow time for effective consideration of the new settlement propositions in the area to be undertaken before further allocations are considered.
- 3.91 As one of the main towns in the GN area, Wymondham will continue to be the second tier in the settlement hierarchy when it comes to allocating future development. Furthermore, given its location within the CNTC, pressure for new development is likely to be greater here than in other towns within the Greater Norwich area outside the Tech Corridor.
- 3.92 We recognise that for some, the Wymondham area may be perceived as having both benefits and challenges in respect of consideration of a new settlement in its vicinity. Similarly, the proximity of a new settlement to existing communities within the town may cause anxieties over the perceived 'overloading' of existing facilities and services.

⁷ As outlined in the Cambridge Norwich Tech Corridor Vision and Spatial Strategy (July 2020) and Prospectus (October 2020)

- 3.93 Whilst this may well be the case if the current 'edge growth' strategy were to continue in future plan-making, the critical mass of a new settlement closely related to a town can deliver the appropriate levels of infrastructure to meet not only its own needs, but also those of the wider community. At SGV, these 'whole town' infrastructure elements could be delivered early in the development programme.
- 3.94 Given that future development at the 'main town' of Wymondham will continue in future rounds of plan-making, it is more important than ever that new facilities and services are planned and provided in tandem with new growth. 'Whole town' needs – such as new secondary school places – will simply not materialise locally with a continued piecemeal 'edge of settlement' growth strategy (even if, ironically, piecemeal sites may end up comprising similar levels of housing numbers to that planned in a new settlement over the same period), whereas the critical mass of a planned new settlement closely related and accessible to the town can both provide land for and unlock the delivery of this scale of infrastructure.
- 3.95 Allocating a new settlement-scale of growth in the form proposed for SGV, well-related and accessible to Wymondham but with a degree of self-containment which minimises local travel impacts, avoids pressure on existing local services and provides new facilities accessible to the existing as well as new community, would provide certainty over the location of future growth of the town over the long term. This is an increasingly important consideration given the recognition in the CNTC of Wymondham's role as a key settlement within the Corridor able to accommodate continued economic and housing growth within and beyond the Plan period.
- 3.96 Importantly for existing communities, the consideration of new settlement options for growth at Wymondham also presents a unique opportunity to simultaneously reinforce and strengthen the protection and mitigation given to locally sensitive features. For example, in the SGV context, considerations such as strengthening the policy protection and releasing development pressure from the strategic gap between Wymondham and Hethersett; mitigating recreational pressure on the Lizard County Wildlife Site by the provision of a new Bays River Park to the west of SGV; and providing new secondary education provision in a location which is easily accessible to the existing community of Wymondham as well as new residents: all 'whole-town' benefits which a new settlement at SGV could bring.
- 3.97 Thus, it is not a case of 'future development or not' for Wymondham, but the decision is about what models of new development forms will best deliver wider objectives for existing as well as new communities. We consider that now is the time to move away from a continuation of unsustainable patterns of piecemeal 'edge' growth which fail to provide for strategic infrastructure needs in favour of new settlement-scale growth well related to the town which in the SGV context, can bring forward development within the same timescale as successive rounds of 'edge growth' but at the same time will deliver transformational infrastructure for the town as a whole.
- 3.98 These aspects of 'whole town' growth planning for Wymondham are a key part of any 'new settlement conversation' with local stakeholders which we would welcome at the earliest opportunity to enable us to allay any entirely understandable concerns about the impact of the proposed development.

Policy 7.4 Village Clusters

- 3.99 We support Policy 7.4 insofar as for the reasons given above, it is appropriate that the identification of further sites for development at Wymondham do not come forward through the Village Clusters document which would undermine the consideration of future growth options for the town properly considered as part of overall GNLP processes.
- 3.100 Nevertheless, we wish to reiterate the procedural concerns we raised within our Regulation 18c submissions (paragraphs 4.22 – 4.24 of our March 2020 representations refer).

- 3.101 Para 382 of the reg 19 Plan states that the SN Village Clusters Plan proposes to allocate sites for 1,200 homes in addition to those already allocated in villages (and we presume, carried forward into the Village Clusters Plan). As a result, almost 10% of the total Greater Norwich new development to 2038 will be delivered essentially through a dispersed settlement strategy. Whilst we recognise the expressed view that new growth on the edge of villages help support the rural economy, we have concerned that this growth acts against many of the overarching whole-plan objectives in relation to climate change and the move to less and more sustainable travel, and the integration of the planning and delivery of infrastructure alongside growth.
- 3.102 We consider that the soundness of the plan in respect of delivering its objectives would be greatly strengthened through a reduction in the number/scale of site allocations to be made through the Village Clusters document, in favour of more overt commitment to the contribution that well-planned new settlement-scale growth within the CNTC could make to meeting the climate change objectives and net zero carbon emission future of the GNLP as well as unlocking locally-sought improvements to amenities and services.
- 3.103 We also maintain our procedural objection to the decision to draw up the two plans in parallel but not to jointly assess or record through the HELAA or SA processes the overall environmental impact of the GNLP as a whole. Any HELAA and SA informing the consideration and allocation of sites within the Village Clusters document will be done in isolation of (a) the overall environmental and spatial growth strategy objectives of the GNLP, and (b) the cumulative impact on existing communities, protected features and infrastructure funding requirements arising from the development of land under what will become a total of 25 Development Plan Documents (DPDs) running concurrently.
- 3.104 This approach would not be permissible through EIA of a development proposal, and we consider that the decision to adopt such an inconsistent approach could threaten the soundness of the GNLP evidence base.

Policy 7.6 Preparing for New Settlements

- 3.105 We strongly support the inclusion of a Policy in the Reg 19 version of the GNLP which recognises the benefits of new settlements as a spatial option for sustainable growth and supports a positive approach to the consideration of new settlement proposals for inclusion in the local plan.
- 3.106 This approach 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 CNTC Vision and Spatial Strategy, and economic growth in this part of the UK relative to Cambridge and the O2C Arc, the government's priority area for global economic growth and investment.
- 3.107 We particularly welcome the recognition in paras 395 and 396 of the need for a new settlement to meet rising housing needs, and that the promoters of new settlements need the confidence and certainty provided by a supportive policy to invest in the considerable amount of technical work, master-planning and local stakeholder engagement to shape growth proposals of this scale.
- 3.108 We also welcome the emerging criteria which the GNLP expects new settlements to meet set out within para 398 and 399; although we do not consider that this is an exhaustive list, it is helpful to identify the overarching requirements at the outset.
- 3.109 Whilst we support the principle and intent of Policy 7.6, we have a number of concerns over the brevity of the Policy wording and supporting text as currently drafted. We are of the view that the policy would benefit from some additional policy wording and alterations in the interest of providing further support and direction.

- 3.110 Our comments below are made in the interests of ensuring Policy 7.6 is found sound for inclusion in the final version of the Plan, but also with an eye to how the two strands of concurrent plan-making can best align to avoid the GNDP finding itself in a confused or conflicted position at Examination.
- 3.111 The comments below are provided in the context of our considerable experience in the plan-making processes for Development Plans in respect of new settlements and strategic scale growth, as well as our experience in the practical implementation of new settlement policies to ensure a smooth transition from policy through SPD to consent and effective delivery on the ground.
- 3.112 We make comments on four aspects of Policy 7.6 and its supporting text:

(a) A note on the Number and Scale of New Settlements Envisaged

- 3.113 At the outset, it is worth noting that the current policy 7.6 wording envisages a situation where more than one new settlement could come forward in the next local plan. We note that the New Settlements Topic Paper (Jan 2019) prepared as part of the Reg 18 Plan makes a number of observations about the scale of new settlements which might be considered within the GNLP area but does not suggest what might ultimately govern the decision over the number and scale of any new settlement(s) to be allocated in a plan review.
- 3.114 In the Topic Paper, it states that the GNDP "*favours a minimum size of a new settlement of 2000 homes*" on the grounds that this would support a primary school and local centre/local services. In terms of scale, two potential options for the GNLP area are outlined in para 19:
- (a) a small scale "*freestanding linked new settlement of 1,500/2,000 to 5,000 new homes*", providing some local services but looking to neighbouring settlements for higher order functions (secondary school, employment etc); or
- (b) a "*larger scale freestanding new settlement of 5,000 dwellings plus*" which would rely on a neighbouring settlement for higher order functions in the early years until a critical mass of development is built". For this option, the Topic Paper recognises that "*larger scale new settlements can provide a high-quality public transport system such as Bus Rapid Transit (if close to an existing network), a secondary school significant employment and larger scale retail and community facilities...[enabling] the creation of a self-supporting mixed-use community built to Garden City principles*".
- 3.115 SGV falls within the second of the two options. Importantly, it should be noted that there is an added benefit of SGV beyond that outlined in the two options above; namely that because of the combination of its scale and location, SGV is capable of delivering 'whole town' benefits to the existing community of Wymondham as well as supporting the higher order function of the town.
- 3.116 We consider the Topic Paper as useful starting point for the consideration of new settlement options and success criteria to be progressed during 2021, and welcome continued engagement in this process. However, we consider that in order to better consider new settlements in the GNLP context, we suggest following should shape the new settlement work from the outset:
- In the GNLP context, the scale of growth set out in option (a) is already happening in several areas: there are a good number of c. 1,500 home sites already committed/allocated around the edges of existing settlements. Whilst improvements in terms of land value capture and garden village design principles might be secured, in our view a continuation of this scale of growth will not unlock the step change to sustainable mobility through self-containment and level of provision of infrastructure alongside growth which is desired by GNDP. On this basis, we suggest that it would be inadvisable to attempt to 'rebrand' a continuation of the

current pattern of allocations into a 'new settlement' spatial strategy and expect that the outcomes will be materially different from that which has been achieved to date;

- Further definition of what a 'new settlement' means in the CNTC/GNLP context. If the degree of self-containment to secure a meaningful change in patterns of movement and deliver infrastructure alongside growth is the driving force behind a move to new settlements as a sustainable growth option for the GNLP area, then we suggest that a new settlement should be capable of accommodating a minimum of c.5,000 new homes (c. 12,000 people). This would have sufficient critical mass to support the necessary on-site infrastructure to meet day to day needs (most notably, a secondary school, but also local facilities - retail, healthcare, community and leisure - to meet the day to day needs of residents within walkable catchments) but also to deliver the necessary off-site infrastructure improvements associated with a sustainable GV model; and
- The circumstances under which more than one new settlement would be justified. If more than one new settlement is to be proposed for allocation, then what drives the decision-making around where and when these come forward - at the same scale? at the same time? in the same housing market area? adopting the same delivery model? Successful delivery of homes through new settlement scale growth will depend on the extent and proximity of potential 'competitor' sites. Having mutually-supportive patterns of growth - as set out in the CNTC Vision of "complementing clusters" - will ensure growth delivers at the pace and quality needed; allocating growth through 'competing' locations or development propositions will not.

(b) Evidence Base for New Settlements

- 3.117 We have previously made submissions to the Reg 18 versions of the GNLP which highlighted the positives of new settlement scale growth and we do not repeat them here.
- 3.118 It should be noted that all three of the new settlement proposals identified in the draft Plan (Honingham Thorpe, Hethel and Silfield GV) have been subject to the same assessment through the GNLP HELAA and SA processes (and at the same time) as the development sites now allocated in the Reg 19 Plan. As potential alternative options for allocations set out in the evidence base, they have also been subject to a degree of public consultation.
- 3.119 Therefore, one could argue that in terms of their overall suitability and sustainability, sufficient evidence exists for the GNLP to make a decision on a preferred new settlement location and to include a locationally-specific criterion-based new settlement policy for inclusion in the current local plan.
- 3.120 However, we understand that because no new settlement has been proposed for inclusion in the plan to date the GNLP wish to undertake further analysis and technical evidence-gathering to allow "comprehensive analysis" of each of the new settlement options identified, against a set of 'selected criteria', and 'beginning in 2021' (para 400 refers).
- 3.121 In respect of SGV, our March 2020 representations to the Reg 18 (c) plan set out its sustainability and deliverability credentials. We have provided both technical assessments and an outline development concept for SGV new settlement, summarised in the *SGV Development Prospectus* (Sept 2019). In addition, in Autumn 2020 we provided evidence to officers in response to a request for information that SGV is both viable and deliverable.
- 3.122 We are therefore in a position to commence positive engagement with the GNLP team at the earliest opportunity to run through any comments or observations the team may have about our assessment and evidence, and to provide any further clarification or analysis to officers as might be requested.

3.123 Alternatively, our evidence base is sufficiently advanced to be in a position to support the GNDP at Examination with technical evidence and track record of delivery should the authorities decide to move to a preferred location or allocation of a new settlement in the Submission version of the Plan in order to meet the stated timescale for delivery.

(c) Proposed timetable for the preparation of the new settlement work;

3.124 We strongly support the inclusion of a timetable for the preparation of the new settlement work within the local plan as part of the positive approach to plan-making.

3.125 We note that the programme is set out in para 401 as follows, (and also that this may be subject to adjustment to take into account changes to the planning system):

- "2021: Developing success criteria, site options assessment including technical consultation;
- 2021: Following adoption of the GNLP, public consultation on site options;
- 2022-24: Development of new Local Plan incorporating preferred site(s);
- 2026 onwards: Delivery"

3.126 We welcome the timetable for commencement of GV development by 2026. Provided the requisite degree of confidence could be secured, approval for a new settlement proposal – particularly one such as SGV with a single landowner – could be achieved by 2026 provided the right policy process is pursued⁸. To this end, we offer the following commentary.

3.127 Firstly, we consider that this timetable should be adhered to alongside any changes to the planning system, rather than use this as a reason to delay activity. In our view, the government's changes to the planning system are unlikely to affect the process which planning authorities have to go through to assess and allocate sites for new development. Whilst the nature of the policy framework might change – for example, a policy for a 'growth area' might include a master plan or other overarching design framework – the steps and legislative environmental framework through which analysis and consultation takes place will remain very similar.

3.128 Therefore, what acts against the ambition to delivery GV growth by 2026 is not the uncertainty around the planning system, or the time taken to secure approval for a new settlement scale of development, but the lack of certainty and commitment in the wording of policy 7.6 itself. As it stands, the policy has no weight attached to the commitment to a new settlement or to the programme for its delivery. This is unlikely to give site promoters the confidence to invest to the degree needed to ensure the necessary plans, applications and approvals can be put in place by 2026, and risks the policy being found unsound.

3.129 In the absence of such weight, we question whether the intention to commence 'delivery' of new settlement development from 2026 onwards would be found sound, given that as it stands, no commitment to a new settlement location, scale or allocation would be included in the Submission

⁸ It should be noted that the location of SGV relative to Wymondham has several advantages in relation to early delivery:

- it can deliver an early phase of development north of the A11 without any major infrastructure constraints;
- this first phase of development would be within a kilometre of the rail station thereby embedding sustainable movement, walking and cycling at SGV from the outset;
- the first phase of development would be in easy reach of Wymondham town centre facilities, freeing up the release of land on-site for new settlement-scale social infrastructure (such as the new secondary school, primary school and 'greenway' into town) as part of the first phase;
- provided a GV allocation was secured, part of this first phase would include advance GI and structural planting elsewhere in and around the SGV site on land owned by the GV landowner so that subsequent phases of development could have a maturing landscape setting and be screened from the surrounding area where needed.

19 version of the Local Plan. Even if the proposed programme was achieved by GNDP (and we are keen to work with the GNDP to move forward on this trajectory), under the current policy process proposed in the Reg 19 plan, the earliest a new settlement could secure confirmed policy support through a local plan review process (i.e., in an Examined or Adopted Local Plan Review) would be 2024, three years from now, leaving just two years to secure outline and detailed planning approvals, pre commencement activity and make a start on site.

3.130 Given the above, we strongly suggest that consideration is given by GNDP to alternative ways in which increased policy commitment to a new settlement allocation could come forward before 2024 (see paras 3.133 to 3.151 below where we have set out some suggested ways forward on this point).

3.131 Notwithstanding our comments below, **as a minimum we consider that the programme as outlined in para 401 should be included within the text of Policy 7.6 as a commitment and should also be included in the next iteration of the Local Development Scheme for the GNLP.**

(d) Policy 7.6 – Alternative Policy Options

3.132 As currently drafted, Policy 7.6 of the Reg 19 plan reads:

"Policy 7.6 - Preparing for New Settlements"

"Subject to the outcome of evidence, assessment and appraisal, one or more new settlements will be brought forward in the next Local Plan".

3.133 Whilst we support the inclusion of a new settlement policy in principle, it is our view that if the policy is to be found sound and the aspiration set out in the supporting text is to be achieved (i.e., delivery of first homes within the new settlement from 2026), then the adoption version of this local plan will need to include either:

- (i) a **preferred or defined locationally-specific allocation** for a new settlement; or
- (ii) a **criteria-based new settlement policy** against which to assess any new settlement proposal coming forward.

3.134 Given the government's proposed direction of travel on local plans, we consider that the first of the two options is more likely to align with any changes to local plans as a result of the Planning White Paper. However, given the advanced stage of the GNLP, the desire of the GNDP to secure an adopted local plan for development management and short-term housing land supply purposes, the requirement to undertake further rounds of local plan consultation on the introduction of a new settlement policy prior to the Submission of the GNLP may not be something the GNDP wishes to contemplate.

3.135 Nevertheless, the authorities have already stated in the GNLP that they require any new settlement to deliver the first new settlement homes on site by 2026. Our footnote 8 above set out how this could be achieved in practice at SGV but leaving the consideration of a new settlement allocation to a future plan review – particularly as there is nothing in the current wording of Policy 7.6 to commit the GNLP (or any individual authority) to do so - will simply not allow this timescale to be met.

(i) Preferred Policy Option

3.136 There is a period of time between now and the Examination of the local plan (scheduled for late 2021) to undertake further assessment and targeted consultation on potential new settlements (in much the same way as the South Norfolk Village Clusters Local Plan document is proposed by

the GNDP to be prepared) which could then feed into the evidence base for the Examination of the Reg 19 Plan.

- 3.137 Provided that consultation requirements could be met, we consider that Policy 7.6 could in theory be expanded to include **a preferred new settlement location, or broad allocation**, based on the new settlement proposals already 'in the system' which it should be noted have already been assessed through the HELAA and SA process.
- 3.138 Given the time constraints – and that when adopted the GNLP will already comprise a number of separate DPD documents – the first option above would not need to fix every aspect of the new settlement but could set out overarching requirements.
- 3.139 These principles would then be taken forward in an AAP (or similar, if the Planning White Paper changes dictate). The drawing up of the AAP alongside the progression of the GNLP to adoption would therefore allow for further assessment, consultation, and consideration of subsequent details to which any new settlement application would have to adhere.
- 3.140 This is a policy approach which has been found sound in a number of other local plans for a similar scale of growth. **Appendix 2** provides examples of policies for new communities of a similar scale to that sought in the GNLP at St Cuthbert's, Carlisle and Bailrigg, Lancaster which have taken a similar approach to policy formulation and which have been found sound through Examination and taken forward into in recently adopted local plans.
- 3.141 **We recommend that a preferred new settlement location policy is included in the Submission version of the GNLP.** This that this approach would allow the GNLP to meet its timetable for the current local plan adoption, whilst also providing sufficient policy context and certainty to move forward the new settlement activity through an AAP and thereby provide appropriate policy context for the timely submission and determination of new settlement applications between now and 2024.

(ii) Alternative Policy Option

- 3.142 A fall-back approach – which would provide some additional certainty than the currently worded Policy 7.6 in moving towards the subsequent allocation of a preferred new settlement in an early plan review and would give a degree of confidence to promoters in moving proposals forward in a timely manner - would be a **criteria-based new settlement policy** which set out the overarching requirements for any new settlement proposal to meet.
- 3.143 Indeed, some of these criteria are already identified in the supporting text of paras 398 and 399:
- "The location and design of any new settlement or settlements for Greater Norwich will need to ensure that they are excellent places to live, built to Garden City principles, and provide housing across all types of need. They will need to be well-connected and deliverable, with sustainable access to a range of jobs and services. They will need to promote our local economic strengths, enhance the environment and promote healthy and active lifestyles.*
- "To achieve all of this, proposals for any new settlement will need to ensure that a significant proportion of any uplift in land value from current use is captured to fund the infrastructure to support the new community. It will be essential that the legal framework for this is agreed with councils at an early stage in the promotion of any new settlement".*
- 3.144 If a criteria-based new settlement policy was to be included in the Submission Plan, then we would support the inclusion of the above principles into the main policy text of a revised Policy 7.6. Paras 398 and 399 reflect the development principles already set out for SGV in the *September 2020 SGV Development Prospectus*, and the location of SGV meets the criteria related to

accessibility and connectivity to the whole range of jobs and services across the entire GNDP area referenced above.

3.145 However, if a new settlement is to also deliver on wider objectives – such as aligning jobs and homes growth within the Tech Corridor; ensuring a shift to zero carbon emissions in line with the GNLP climate challenge objectives; and capturing the strategic infrastructure investment in rail as well as road infrastructure – then locational criteria will also have to be included within a criteria-based policy 7.6. With at least three potential new settlement options currently being promoted publicly in the GNLP, without a preferred location being identified in policy 7.6, such a policy may not provide clarity or certainty for local communities or give promoters the level of confidence to ensure proposals move forward at the pace required in para 401.

3.146 It is for these reasons that we do not advocate a criteria-based policy unless it clearly identifies a preferred location for a new settlement.

(iii) 'Do Minimum' Option for Amended Wording of Policy 7.6

3.147 In the event that the GNDP reject either of our suggested amendments under (b) and (c) above and consider that any revisions to the current wording of Policy 7.6 should be kept to a minimum for the current Plan, then we consider that as a minimum, **Policy 7.6 should include the suggested timetable within para 401 within the main body of the policy itself**, rather than within the supporting text.

3.148 Making this change would formalise the new settlement work timetable and could deliver several benefits including:

- (a) some degree of confidence and certainty for potential new settlement site promoters regarding timescales and resourcing;
- (b) opportunities to align the work with other ongoing initiatives and activity such as the CNTC Prospectus work; Highways England investigation work/ongoing work on the NCC LTP and local plan transport modelling; and
- (c) would offer a degree of policy support for new settlement scale growth that could lever in Government capacity funding or capital funding for associated infrastructure investment.

3.149 In this scenario, we suggest that the Submission version of the plan could amend Policy 7.6 to read:

"Policy 7.6 Preparing for New Settlements

*Subject to the outcome of evidence, assessment, and appraisal, one or more new settlements will be brought forward in the next Local Plan. **The broad timetable for this work is as follows*:***

- **2021**:** *developing success criteria, site options assessment including technical consultation;*
- **2022:** *following adoption of the GNLP, public consultation on site options;*
- **2022-24:** *development of new Local Plan incorporating preferred site(s);*
- **2026 onwards:** *delivery of enabling and supporting infrastructure;*
- **2028 onwards:** *anticipated first occupations.*

***The above timetable sets out the authorities' intentions and is designed to provide clarity for local communities and site promoters. Progress against this timetable will be monitored through the annual monitoring reporting process and will be reviewed against any future emerging changes to the planning system arising from the Planning White Paper.**

****Work is underway to develop the criteria upon which new settlement proposals will be judged. This work is programmed to be completed prior to the commencement of the Examination in Public of the GNLP. Therefore, alongside the submission version of this policy it will be possible to identify the proposed success criteria ahead of the formal testing of this policy at examination. Respondents [stakeholders] will have an opportunity to comment on the criteria through the technical consultation to be undertaken as part of the new settlement preparation work during 2021.**

- 3.150 As the 'success criteria' identified in para 401 are programmed to be confirmed and made available during 2021, and definitely by the time the Examination in Public (EIP) hearings of the GNLP commence, we are of the view that the above text of Policy 7.6 could also act as a 'placeholder' for any further revisions to Policy 7.6 wording at the time of submission or Examination.
- 3.151 In addition to the above policy wording, we also recommend that the agreed programme currently in para 401 should also be included explicitly in the Local Development Scheme for the GNLP going forward – again, an approach supported by Inspectors in similar circumstances⁹.

⁹ See paragraph 36 of the Inspectors Report (25 July 2016) to Carlisle City Council Plan in respect of St Cuthbert's, Carlisle - <http://www.carlisle.gov.uk/planning-policy/Local-Plan-Examination/Examination-Document-Library>.

APPENDICES

Appendix 1 - Technical Review of Housing Needs in Greater Norwich (Turley)

Appendix 2 - Example New Settlement Policies

Appendix 1 - Technical Review of Housing Needs in Greater Norwich Addendum (Turley)

Update to the Technical Review of Housing Needs in Greater Norwich

Greater Norwich Local Plan Regulation 19
Representations on behalf of Orbit Homes
(2020) Ltd

March 2021

Turley

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Client

Orbit Homes (2020) Ltd

Our reference

ORBP3000

March 2021

Executive summary

1. Broadland District Council, Norwich City Council and South Norfolk Council ('the Councils') are currently consulting on the Publication draft version of the Greater Norwich Local Plan ('the Draft Plan') until 22 March 2021. This report has been prepared by Turley on behalf of Orbit Homes (2020) Ltd to critically appraise the housing requirement proposed therein, updating a submission made last year during the previous round of consultation¹.
2. The Draft Plan, like the previous iteration, continues to acknowledge a need for **2,027 dwellings per annum** throughout Greater Norwich over the plan period (2018-38). This reflects the '*minimum*' need derived from the standard method as of the base year, where its recent evolution – announced in December – does not affect this area. This is around 10% below the average rate of housing delivery over the past five years.
3. The Councils do, however, propose a requirement that is around 22% higher than the minimum need at around **2,475 dwellings per annum**, or 49,492 homes in total, the latter being approximately 5,000 more homes than originally proposed last year. Such a buffer is required by national policy to protect against delays or non-delivery of future supply, but the Councils have confusingly suggested that this buffer also responds to – and is at least partially justified by – **demographic evidence of a greater housing need than implied as a minimum by the standard method**.
4. While the acknowledgement of this evidence is welcomed, having been highlighted in our previous submissions last year, **the Councils disappointingly appear to have made no attempt to quantify or robustly substantiate the actual scale of this higher need**. This provides inadequate assurance that the proposed requirement is sufficient to meet housing needs in full, *and* contains an appropriate buffer to separately guard against risks to supply.
5. **The Councils are advised to rectify this situation prior to the submission of their Local Plan by preparing a robust Housing and Economic Needs Assessment**, to comply with national guidance and clarify the number of homes that are actually likely to be needed in Greater Norwich where this appears likely to – and is clearly allowed to – exceed the outcome of the standard method.
6. **This process should involve an up-to-date assessment of the employment growth likely to result from ongoing investment and growth plans throughout Greater Norwich**. This is unfortunately absent from the recently published Addendum to the Employment Land Assessment, which relies on a baseline forecast from Experian that unusually assumes minimal job growth beyond 2022. While the authors do proceed to adjust this forecast in developing an '*alternative growth scenario*' – ostensibly accounting for the City Deal, the opportunities associated with the emerging Tech Corridor and other economic assets – the approach taken appears grounded in national rather than local evidence and adds less than 500 extra jobs to the baseline over eighteen years to 2038. This would represent a poor return on investment, especially

¹ '*Technical Review of Housing Needs in Greater Norwich*' report prepared by Turley and submitted as part of representations to the Regulation 18 Draft Plan consultation last year

where Greater Norwich has recently proven to be extremely successful in translating investment into new jobs. Other strands of the Draft Plan apparently aim to sustain this success, in proposing to allocate over four times the employment land implied to be needed to accommodate the '*alternative growth scenario*' for example. This is likely to require a parallel increase in housing provision, to ensure that investment is not constrained by a lack of available or suitable labour.

7. **The extent of the economic ambition, and the opportunities presented by planned investment, mean that housing need can be reasonably expected to rise over the plan period.** The Draft Plan acknowledges this prospect in the supporting justification for Policy 7.6, which sets out the Councils' conviction that one or more new settlements will be required to address housing needs in the future. In the context of the analysis and conclusions of this report, it is considered that the Councils should take a more proactive and positive approach to planning for the realisation of new settlement development. Where the Councils recognise that the lead-in time for new settlements spans a number of years, in order for such a new settlement or settlements to contribute to meet rising needs in the short-medium term there is a strong rationale for the Local Plan providing a firmer commitment to their role. This recognises specifically the expectation set out in the Draft Plan that a new settlement(s) will start delivering from 2026, which would fall within the timeframe of this Local Plan prior to a review which may follow up to five years after its adoption. Recommendations in this regard are set out in the overarching representations to which this technical report is appended.

8. **Planning for a new settlement within this Local Plan will ensure a greater level of resilience in the supply of new homes over the medium-long term.** Where this update has focused on housing demand issues, it is separately observed that the Councils' proposed supply of housing land substantively relies on both windfalls (1,296) and the parallel realisation of the South Norfolk Village Clusters Housing Site Allocations Local Plan for example (relying on a minimum of an additional 1,200 allocations). Where the provision of homes through these routes, as opposed to allocations within the Plan itself, is subject to greater uncertainty, the identification of a new settlement with a clear phased trajectory will offer an important mitigation measure.

1. Introduction

- 1.1 Broadland District Council, Norwich City Council and South Norfolk Council ('the Councils') are currently consulting on the Publication draft version of the Greater Norwich Local Plan ('the Draft Plan') until 22 March 2021.
- 1.2 This report has been prepared by Turley on behalf of Orbit Homes (2020) Ltd to critically appraise the housing requirement proposed by the Councils. It forms an update to the previous *Technical Review of Housing Needs in Greater Norwich* report prepared by Turley and submitted as part of representations to the Regulation 18 Draft Plan consultation last year.
- 1.3 This report observes that the Draft Plan's housing requirement continues to be underpinned by the Councils' application of the standard method for assessing housing need. It is acknowledged, however, that the level of housing provided for through Policy 1 over the plan period (2018-38) is circa 22% greater at 49,492 homes, around 5,000 homes more than proposed in the previous draft.
- 1.4 Where the Councils describe this as allowing for a buffer, it is confusingly justified on the basis of an acceptance as to the likelihood of higher growth rates in the future, with specific reference to the most recent demographic projections. This would imply that the Councils recognise a higher housing need than implied by the standard method – as is permitted by national policy and guidance – but they have not, in the evidence published to date, quantified this higher need nor explicitly set out its evidential basis.
- 1.5 Where our client is supportive of the Councils' more positive approach in providing for a higher level of housing growth, this report – coupled with our earlier technical review – suggests that there is a strong likelihood that the need for housing will continue to rise above that provided for over the course of the plan period. Specifically, this continues to recognise evidence that the successful realisation of the Councils' economic growth strategies will necessitate a further increase in housing supply to provide the requisite labour force.
- 1.6 Our previous technical review highlighted deficiencies in the evidential justification for the proposed housing requirement. While we agree that there is a clear justification for the Councils identifying a higher need for housing than the minimum calculated using the standard method, we continue to recommend that the Councils more clearly demonstrate this by preparing a robust and up-to-date Housing and Economic Needs Assessment (HENA) which is compliant with the current National Planning Policy Framework (NPPF) and its related Planning Practice Guidance (PPG).
- 1.7 This will ensure that the submission version of the Local Plan provides an adequate supply of deliverable housing land that is capable of meeting an evidenced need in full. This must, in accordance with the PPG, take full account of an up-to-date assessment of the likely level of employment growth which will be realised as a result of investment and growth plans. In this regard, on the basis of the analysis in this report we would recommend that in preparing the HENA the Councils revisit their economic growth forecast in particular, where the latest iteration is considered to insufficiently

recognise the strong economic credentials of the local area and the sustained opportunities for additional job growth to be realised as a result of planned investment.

Report structure

1.8 The report is structured as follows:

- **Section 2 – Findings of the previous technical review**
- **Section 3 – The updated Local Plan requirement**
- **Section 4 – Evaluating the proposed housing requirement**
- **Section 5 – Conclusions**

2. Findings of the previous technical review

- 2.1 The previous technical review observed that the Regulation 18 iteration of the Local Plan sought to provide for an identified need for 2,027 homes per annum.
- 2.2 The stated need for housing was based on the calculated outcome of the standard method, and thereby represented the '*minimum*' need to which the Plan was required to respond without demonstrating exceptional circumstances². The proposed housing requirement was set slightly above this minimum need, at 2,217 homes per annum, to reflect an apparent recognition of the potential for greater need through the application of a separate buffer which was also intended to allow for concerns around delivery and therefore introduce flexibility.
- 2.3 It was noted that the Councils had not presented any up-to-date evidence on the housing needs of the area to substantiate a position where this minimum need was truly reflective of the full needs of the area. In terms of the published evidence outwith the standard method, it was noted that the Councils relied on a Strategic Housing Market Assessment (SHMA) published in 2017 as the evidential basis for its housing policies. This evidence base therefore preceded the introduction of the standard method in the revised NPPF and PPG and will by the time of submission be approaching five years old.
- 2.4 In the absence of up-to-date evidence published by the Councils, the technical review drew upon bespoke commissioned demographic modelling from Edge Analytics to scrutinise the scale of need implied by the standard method and consider the extent to which it aligned with other strands of the Local Plan. Specific reference was made to the stated economic growth ambitions, alongside other market evidence of demand and updated demographic evidence.
- 2.5 On the basis of this assessment, it was concluded that there was a clear and justified need to depart from the output generated by the standard method and acknowledge a higher level of housing need in Greater Norwich. This was because:
- The outcome of the standard method was and remains intrinsically linked to **projections that have underestimated population growth** to date in Greater Norwich, and particularly failed to anticipate a more pronounced – and increasingly vital – net inflow of people from other parts of the UK. This calls into question whether the method is accurately capturing the housing needed by the population in this area, both now and in the future;
 - Meeting the need implied by the method would likely grow the labour force and support in the order of 37,000 new jobs between 2018 and 2028, ostensibly surpassing the target of 33,000 jobs then proposed but **falling short of the job growth that can be reasonably expected to result from an ongoing economic growth strategy**. The Councils' target was considered inadequate in this regard, given that it was derived from an unjustified and unduly simplistic manipulation of a scenario presented in an evidence base document that was increasingly

² MHCLG (2019) National Planning Policy Framework, paragraph 60

dated and predated the revised NPPF. Equally, as a result of the datedness of the informing analysis, it was not considered to adequately reflect the strong economic context which Greater Norwich had demonstrated for a sustained period of time or the full impact of planned investment. In this context it was considered that planning for in the order of 40,000 jobs as a minimum over this plan period would be more reflective of the strong potential for truly enhanced growth in Greater Norwich. This clearly would not be supported where housing provision is restricted to the level implied by the standard method, and the associated ageing of the labour force also appeared unlikely to support the desired shift towards higher value sectors; and

- Simply meeting the need implied by the method would have prompted a **16% reduction in the annual rate of housing delivery** belatedly achieved over the three most recent years, when adopted housing targets were met for the first time. Such a reduction was and continues to be unjustified at a time when the Government remains committed to significantly boosting housing supply.

2.6 The technical review also referenced uncertainty at that time as to the approach the Government would take in delivering against its commitment to revise the standard method. The Government's subsequent updating of the PPG in December 2020, to reflect revisions to the standard method, have had no direct impact on the calculation of need for this area where Norwich is not within the twenty largest urban areas which are required to uplift their needs by 35% as the only material change to the method.

2.7 Further to the above, the technical review also arrived at two other recommendations to the Councils with regards the progression of the Local Plan in relation to the planned provision for housing, namely that:

- Their attempt to justify a position whereby the housing requirement provides sufficient flexibility to respond to higher housing need was substantively flawed. The argument which was advanced in this regard was that the proposed housing requirement was circa 9% higher than the claimed need, derived from the standard method. However, our technical review identified that this buffer was intended to alleviate risks to *supply* and therefore represented a separate requirement of national policy. The PPG clearly emphasises that an assessment of the potential for higher need, relative to the standard method, must be undertaken '*prior to, and separate from*' any consideration of supply, with this remaining unchanged in the current version³; and
- In progressing the Local Plan, it was necessary for the Councils to update their evidence in relation to housing needs, to comply with the NPPF and PPG. It was recommended that such an exercise should properly evaluate the level of job growth that is likely in Greater Norwich, taking recent successes – no doubt linked to the City Deal and other initiatives – into account while reconsidering the prospects for long-term growth beyond “business as usual” in key locations and sectors. A related assessment of housing needs should then also be produced, to locally test the minimum need implied by any standard method and

³ PPG Reference ID 2a-010-20201216

ensure that the housing needed to support a growing economy can be robustly and positively planned for.

- 2.8 The next section provides a concise summary of the updated housing requirement in the latest Draft Plan, considering how the current proposals and the supporting evidence respond to our previous submissions.

3. The updated Local Plan housing requirement

- 3.1 Policy 1 of the Draft Plan states that *'to meet the need for around 40,550 new homes, provision is made for a minimum of 49,492 new homes'*. This equates to an annual need for 2,475 homes per annum over the plan period, from 2018 to 2038.
- 3.2 The Draft Plan confirms that the *'need'* stated in the policy continues to be calculated by applying the standard method, as in last year's Regional 18 version. It notably remains exactly in alignment with the figure previously referenced therein, where it retains a base year of 2018. This is shown in Table 2.1 overleaf which summarises the components of the *'housing potential figure'* now presented in the Draft Plan, compared with the Regulation 18 version.

Table 3.1: Establishing the Draft Plan’s Total Housing Potential Figure

	Number of homes		Explanation
	Reg. 18	Reg. 19	
A Local housing need (2018 to 2038)	40,541 (2,027pa)	40,541 (2,027pa)	The minimum local housing need figure has been identified using the Government’s standard methodology
B Delivery from base date	2,938 (2018/19)	5,240 (2018/19 & 2019/20)	The number of homes built 2018/19 (including student accommodation and housing for the elderly)
C Existing commitment to be delivered to 2038	33,565 (at April 2019)	31,452 (at April 2020)	The existing commitment is the undelivered sites which are already allocated and/or permitted, with parts of or whole sites unlikely to be delivered by 2038 excluded.
D New allocations	7,840	10,704	These are the homes to be provided on new sites currently proposed to be allocated through the GNLP and the South Norfolk Village Clusters Housing Sites Allocation Plan (1,200). The Reg. 19 Plan also includes the Diss and area Neighbourhood Plan
E Homes delivered through Policy 7.5	n/a	800	Policy 7.5 in the Reg. 19 Plan provides for delivery of 3 to 5 homes on small scale sites adjacent to settlement boundaries or on small sites within recognisable groups of dwellings
F Windfall allowance	n/a	1,296	An allowance for windfalls included in the Reg. 19 Plan.
G Total housing figure (B+C+D+E+F)	44,343 (2,217pa)	49,492 (2,475pa)	Under the Reg. 18 Plan the figure provides a 9% buffer to cater for non-delivery of local housing need. Under the Reg. 19 Plan it is described as allowing a buffer of 22% to cater for the potential for higher growth rates whilst also mitigating risks associated with non-delivery.

Source: Greater Norwich Local Plan Strategy Regulation 18 version (2020) and Regulation 19 version (2021)

3.3 It is apparent that the planned provision under the Regulation 19 Draft Plan is around 5,000 homes higher than the Regulation 18 version. Table 2.1 confirms that this results from the addition of a number of supply components, namely an increased number of

allocations and an allowance for windfalls and ‘small sites’. It is thus presented as a ‘buffer’ that is additional to and separate from the underlying ‘need’, which is unchanged.

- 3.4 Importantly, and as set out in our previous technical review, it is agreed that the Councils are correct to identify a buffer where this is required to allow for unforeseen circumstances or non-delivery of sites which might otherwise pass the ‘developable’ test. Whilst the Councils have recognised this general point, and the resultant need for an increased level of flexibility, this should not be seen to provide capacity to accommodate need pressures; it is intended to alleviate risks to supply. In this context, the PPG is explicit in recognising that when authorities consider the appropriateness of a higher housing need figure:

*“This will need to be assessed **prior to, and separate from**, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan)”⁴ (emphasis added)*

- 3.5 In the latest iteration of the Draft Plan, the failure to appreciate this distinction is further confused by the clear suggestion that the more pronounced ‘buffer’ now being applied responds to, and is justified by, an acknowledged higher demographic need for housing.

- 3.6 In justifying the higher housing requirement, the Draft Plan states that the Councils consider that the larger ‘buffer’ is required to allow for higher growth rates signalled by the Government’s Planning for the Future consultation, and by the 2018-based projections for Greater Norwich which are higher than the 2014-based dataset used in the standard method. Indeed the reliance on the demographic projections as the justification is clear where the Draft Plan proceeds to state that ‘*the potential growth indicated by the 2018-based projections would equate to the identification of around 5,000 additional homes*’⁵.

- 3.7 Where this is exactly aligned with the uplifted requirement, it is clear that the Councils are acknowledging alternative demographic evidence to justify the selection of the housing figure. This is acceptable in principle, with the PPG confirming that plan-makers – in identifying a need higher than implied by the standard method – should ensure that ‘*current and future demographic trends and market signals*’ are adequately reflected⁶. Indeed, this was a key conclusion of our previous technical review paper – summarised in section 2 – where reference was directly made to the 2014-based projections underestimating demographic trends that have subsequently been taken into account in producing the 2018-based projections, as acknowledged by the Councils.

- 3.8 An overreliance on the 2018-based projections as the prime justification for a higher housing requirement could, however, be seen to conflict with the PPG which states that:

⁴ PPG Reference ID 2a-010-20201216

⁵ Draft Plan (2021), paragraph 178

⁶ PPG Reference ID 2a-015-20190220

“Any method which relies on using household projections more recently published than 2014-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method”⁷

- 3.9 While we agree with the Councils that the need for housing over the plan period is likely to increase and exceed the level suggested by the standard method, it would nonetheless be advisable to strengthen the justification for a higher housing requirement by undertaking a full assessment of need. This is clearly permitted and indeed expected by the PPG, where it acknowledges that there will be circumstances where *‘actual housing need is higher than the standard method indicates’*⁸.
- 3.10 The PPG identifies some of the circumstances that could lead to increased housing need, beyond the past trends that are embedded in the standard method. This is not intended to be exhaustive or viewed as a closed list, but includes situations where:
- Deliverable growth strategies are in place, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
 - Strategic level infrastructure improvements 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.
- 3.11 Within the same sub-section of the guidance, two further *‘situations’* are identified that *‘will need to’* be taken *‘into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests’*⁹. These are where either of the following are *‘significantly greater’* than the outcome of the standard method:
- Previous levels of housing delivery; and
 - A previous assessment of need, such as a recently-produced Strategic Housing Market Assessment (SHMA).
- 3.12 Our earlier technical review as summarised in section 2 affirmed that a number of these criteria were directly applicable to Greater Norwich. In this context, rather than providing a larger supply-led *‘buffer’*, the Councils should recognise the existence of a higher *need* instead of simply relying on the standard method as a measure of the underpinning need against which supply will be measured¹⁰.

⁷ *Ibid*

⁸ PPG Reference ID 2a-010-20201216

⁹ *Ibid*

¹⁰ Draft Plan (2021), paragraph 177

3.13 As we set out in the following section, we consider that the evidence continues to affirm that a higher housing need is likely, not only for demographic reasons, and that this should be planned for to accord with the NPPF and PPG.

4. Evaluating the proposed housing requirement

- 4.1 The previous technical review highlighted the failure of the published evidence base to adequately assess and recognise the numerous limitations of the standard method's calculation of need in the specific circumstances of Greater Norwich. Where, as noted in the preceding chapters, the Draft Plan now intends to provide for a greater number of homes, the supporting evidence once again fails to justify the retention of the standard method as an underlying need figure. This section builds upon our previous technical review to demonstrate the evidential indicators of higher housing need which the Councils should consider in order to comply with the PPG in recognising and evidencing a higher need for housing.

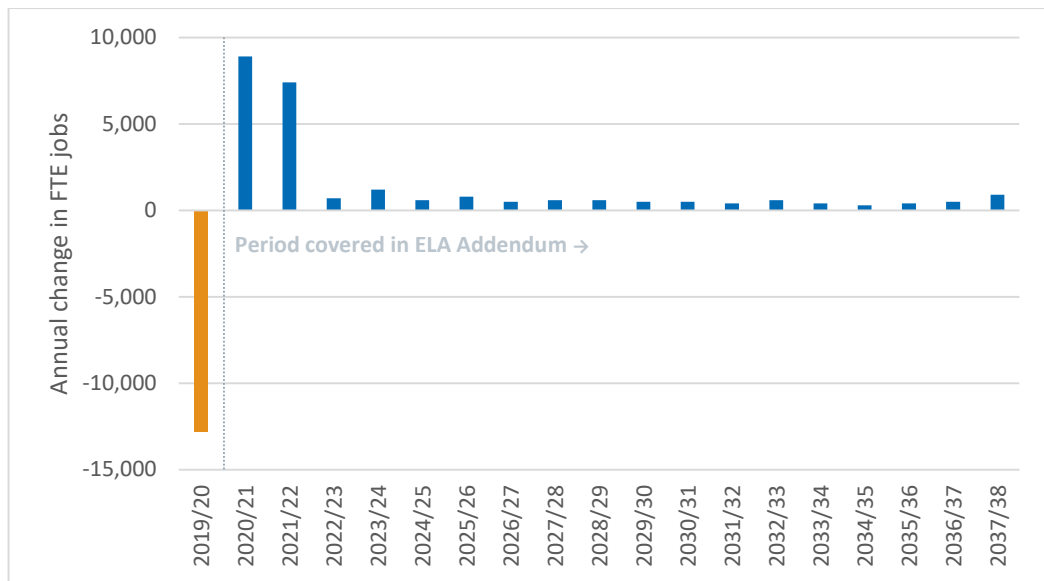
Supporting an Economic Growth Strategy

- 4.2 Under the sub-section titled '*Employment Growth Needs*' in the Draft Plan, the Councils continue to cite that '*the overall target for jobs growth is for an increase of 33,000 jobs from 2018 to 2038*'¹¹. The following sentence then includes a footnote which explains that this figure has – as was the case in the Regulation 18 version – been based on a trend-based forecast, noted as the 2017 iteration of the East of England Forecasting Model (EEFM).
- 4.3 However, in explaining its strategy for identifying a supply of employment land to respond to needs, the subsequent paragraph of the Draft Plan notably references both the Employment Land Assessment (ELA) produced in 2018 – which did indeed use the 2017 EEFM – and its more recent Addendum¹², which was completed in November 2020 and includes an update to the forecasting of economic growth across Greater Norwich.
- 4.4 The ELA Addendum primarily draws upon a forecast produced by Experian in September 2020, with no suggestion that this has been compared to the earlier EEFM forecast. Figure 39 of the Addendum illustrates the trajectory of this forecast, which anticipates an additional 32,700 full time equivalent (FTE) jobs between 2020 and 2038. This may appear to align closely with the '*target*' in the Draft Plan, and by implication the previous forecast, but this is not an accurate comparison given that the latest forecast covers a period that is two years shorter than the plan period, starting in 2020 rather than 2018. This means that the latest forecast, presented in the Addendum, is more optimistic on the basis of average annual growth.
- 4.5 This apparent optimism is, however, tempered when reviewing the trajectory of the Experian forecast, shown at Figure 39 of the Addendum. This implies that the vast majority of the additional jobs forecast are assumed to be created in the first two years of the forecast period, in a recovery from the losses assumed to have resulted from the pandemic. This is further illustrated by Figure 4.1 below, which draws upon what is understood to be the same Experian forecast but focuses on annual change, also including the prior year excluded from the Addendum.

¹¹ Draft Plan (2021), paragraph 168

¹² Avison Young (2020) Greater Norwich Employment Land Assessment 2020

Figure 4.1: Forecast Annual Change in FTE Jobs (Experian, September 2020)



Source: Experian

4.6 As such, there appears to be a critical assumption that the size of the employment base in Greater Norwich is forecast to essentially stagnate after 2022 for the remaining sixteen years of the plan period.

4.7 The Addendum at least partially recognises the limitations of this so-called baseline forecast, particularly where it is noted that they have been produced in the midst of an ongoing pandemic. It confirms that:

“As the scale and duration of the pandemic’s impact on the economy becomes better understood it is likely these forecasts will be adjusted to reflect new information available”¹³

4.8 While it is appreciated that this is a challenging time in which to undertake an assessment of economic performance, and that forecasts will be subject to change, it is considered that the Addendum – in presenting the baseline as a justification for the Council’s continued job growth target – fails to fully appreciate the importance of this inherent limitation. This is particularly the case where such a muted economic outlook in the forecast contrasts significantly with:

- The Draft Plan’s acknowledgement that between 2015 and 2018 the area saw around 15,000 jobs created¹⁴, or circa 5,000 jobs per annum, and that back to 2011 the economy has grown by around 15% (29,100 jobs)¹⁵; and
- A recognition that this job growth has in no small part been supported by City Deal interventions and investment, and an ongoing commitment that the City

¹³ *Ibid*, paragraph 3.13

¹⁴ Draft Plan (2021), paragraph 290 with the data source referenced as the EEFM

¹⁵ *Ibid*, paragraph 66

Deal growth requirements – agreed with Government in 2013 – ‘*will be met through the GNL¹⁶*’.

- 4.9 It is acknowledged that the Addendum does not only present a baseline forecast, with its analysis also including an ‘*alternative growth scenario*’ where it recognises that ‘*given the nature of the Greater Norwich economy it is unlikely ‘business as usual’ will be a true reflection of the future economy*’¹⁷.
- 4.10 Such an approach is considered critical where, as we observed in our earlier technical review, Greater Norwich is expected to continue to benefit from investment to support economic growth including but also additional to the City Deal. Indeed, the Draft Plan continues by way of an example to proclaim the potential for Greater Norwich to ‘*support the globally significant growth axis within the Cambridge Norwich Tech Corridor*’¹⁸. It affirms that the Tech Corridor is intended to take advantage of the dualling of the A11, which was completed in 2014, to ‘*boost economic development*’¹⁹.
- 4.11 Where it is agreed that the development of an up-to-date scenario which builds in such investment must inform the Draft Plan’s policy approach to employment and housing provision, it is – in the context of the stated ambition – somewhat underwhelming that the outcome of the exercise in the Addendum is to generate a so-called growth scenario which suggests that only circa 500 extra jobs beyond the baseline will be created over the 18 year forecast period. This would seem a particularly poor return on investment and again fail to reflect the success of the area to date in translating investment into new job opportunities.
- 4.12 Where the baseline is, as observed above, essentially assuming a flatlining of the employment market for all but the first few years of the plan period, it is difficult to understand how the suggestion of such a minor level of additionality associated with investment or local sector specialisms can genuinely be labelled as a ‘*growth scenario*’. This is starkly apparent where the economic assets which are listed in the ELA Addendum are recognised, namely:
- A cluster of knowledge-based activities anchored by the University of East Anglia and major international businesses such as Lotus and others located on the Norwich Research Park;
 - Demonstrable specialisms in agri-biotech, food and health, genomics, medical-tech and industrial bio-tech. Recent experience suggests that these sectors are likely to have a positive future and certainly would be expected to generate above-trend levels of growth;
 - The identification of Norwich as a ‘*top tech city*’ with a growing base of digital tech businesses; and

¹⁶ *Ibid*, paragraph 18

¹⁷ *Ibid*, paragraph 4.1

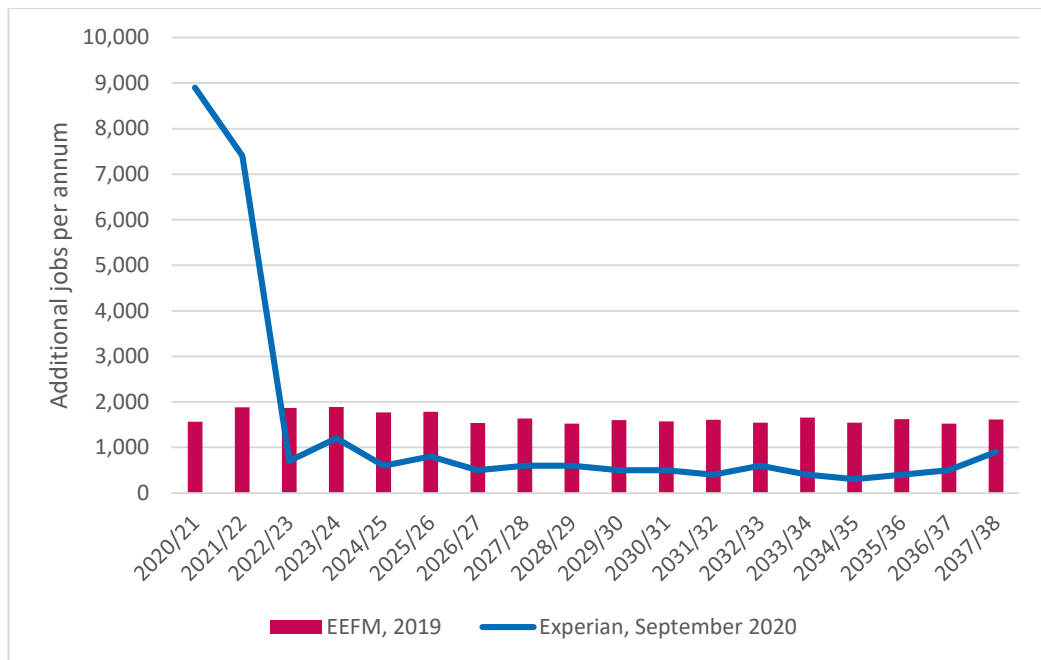
¹⁸ *Ibid*, paragraph 64

¹⁹ *Ibid*, paragraph 77

- The city's similar label as a leading centre in the UK finance and insurance services market.
- 4.13 The approach to adjust four key sectors of the economy in this context appears reasonable in principle. However, the approach taken by the Addendum's authors to apply what are described as local adjustments appears to focus on alternative growth rates largely derived from national research. These adjustments are applied to the existing and very muted assumptions of growth rates in the Experian forecast. Such an approach would appear to simply refine the approach taken by Experian, which itself takes such a national perspective, instead of taking the opportunity to fully consider the resilience, historic growth credentials or opportunities presented by sectors represented in Greater Norwich itself. This is considered to undermine the effectiveness of the exercise and as a result the conclusion that job will be so muted for much of the plan period.
- 4.14 The above limitation with regards the underlying forecasting of job growth is in no small part driven by a comparatively short-term view of Experian as to the immediate consequences of the pandemic, with less focus likely to be given in the forecast to the longer-term prospects of the economy. In this context, it is considered that it remains appropriate and of relevance to consider economic forecasts prepared prior to the pandemic in order to understand how they viewed the economic prospects of sectors over the longer-term. Whilst it is not suggested that these should be given greater weight, where they themselves are evidently limited in the extent to which they precede what has been a fundamental shock to the global, national and local economy, they do provide an important complementary insight.
- 4.15 To this end it is noted that the East of England Forecasting Model (EEFM), previously relied upon in the Council's evidence, also produced a more up-to-date economic forecast which was published in August 2020, despite a suggestion the Addendum that such an update did not exist²⁰. This iteration of the EEFM is clear to state that it was developed prior to the onset of the pandemic and therefore does not attempt to take this into account. However, in providing a contrast to the Experian baseline forecast now used in the Council's evidence it is readily apparent that whilst projecting an overall similar level of job growth (circa 29,700 jobs) over the plan period 2020 to 2038, its trajectory for job creation is notably different particularly over the longer-term. This is shown in Figure 4.2.

²⁰ Avison Young (2020) Employment Land Assessment Addendum 2020, paragraph 3.4

Figure 4.2: Profile of Experian and EEFM Forecasts – Annual Change (2020-38)



Source: EEFM; Experian; Turley analysis

- 4.16 Where it is evident that the EEFM forecast does not capture the impact of the short-term shock in local employment numbers – noting that this remains an estimate even in the Experian forecast as a result of data lagging behind events – the prospect of Greater Norwich continuing to see employment growth beyond the next few years is clearly recognised in this forecast. Indeed, in contrast to the almost stagnant Experian forecast the EEFM notably suggests that over 24,000 jobs will continue to be created beyond 2023 across the area. In the context of the historic evidence and the investment planned to support the local economy, this certainly appears a reasonable prospect and would further indicate that the impact on other forms of infrastructure, including housing, is likely to be more sustained over the plan period than a literal interpretation of the Council’s latest economic evidence base would suggest.
- 4.17 Further to the above, it is important to separately observe that where Addendum suggests a calculated need for circa 74-76ha of employment land, using the Experian baseline and growth scenario forecasts, the Draft Plan proposes to provide over four times as much employment land, some 360ha in total²¹. In justifying this considerably higher figure, the Draft Plan notably continues to make reference to the earlier iteration of the EEFM model which itself included a ‘*growth scenario*’ forecast. In stark contrast to the comparably named scenario in the ELA Addendum, the Draft Plan observes that this earlier iteration suggested an uplift of around 8,000 jobs above the ‘business as usual’ forecast, with this seen to be ‘*consistent with City Deal ambitions*’²².
- 4.18 Where this provides another clear indication that the Councils’ latest economic evidence is substantially underestimating the economic impact of opportunities

²¹ Draft Plan (2021), paragraph 170

²² *Ibid*, paragraph 290

associated with planned investment, it is separately reasonable to assume that where this land is developed notably higher levels of employment growth would be expected to arise. Indeed, the Draft Plan confirms that in providing for a greater amount of employment land than the calculated need it *'provides for growth in the longer term and supports more ambitious levels of job growth if demand can be stimulated'*²³.

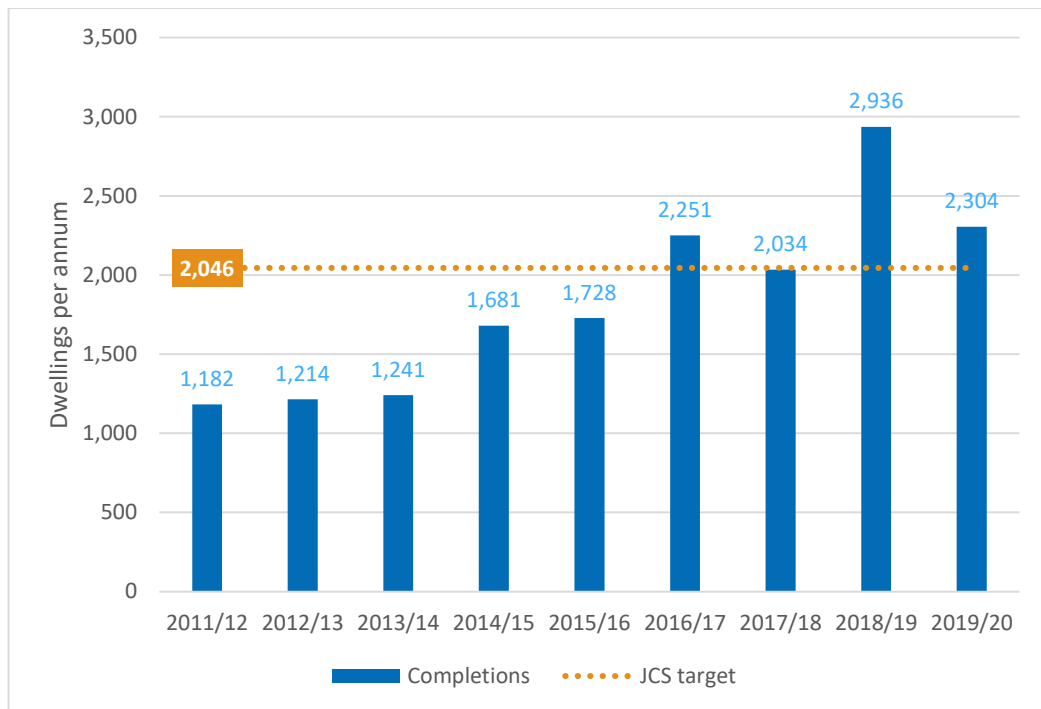
- 4.19 As we established in our previous technical review, supporting higher levels of job growth will in turn have implications for the scale of housing needed to accommodate the required workforce. Our previous technical review drew on bespoke demographic modelling commissioned from Edge Analytics to assess the implications of providing for housing to align with the standard method over the plan period. This particularly highlighted that the demographic structure of Greater Norwich would likely lead to a significant ageing of its population in such a scenario, to the extent that nearly half (45%) of the additional labour force capacity emerging over the plan period would be people aged over 60 years old. This evidently presents a risk in aligning with the ambitions to see growth in a number of sectors which will necessitate new skills more often associated with graduates and younger cohorts.
- 4.20 It is reasonable to expect that the creation of new jobs through the Tech Corridor, for example, would attract greater numbers of graduates and younger professionals, a proportion of which may be retained from the further and higher education providers in Greater Norwich. This in turn would be expected to generate further demographic growth which should be reflected in any calculation of housing need.
- 4.21 In this context, it remains the case that as the Councils continue to revisit and monitor their evidence base, following the advice of its consultants, they should ensure that the Draft Plan has sufficient flexibility to respond positively to higher levels of associated housing need in order to positively encourage the attraction and retention of skilled labour.

Past delivery and market signals

- 4.22 The previous technical review highlighted that there was evidence of a rising trend of housing completions in Greater Norwich. While the area had seen an average of 1,738 homes built annually since 2011, the last three years of data available at the time had each seen over 2,000 homes built consistently.
- 4.23 The Draft Plan includes a further year of completions data (2019/20). This affirms this trend with the latest year seeing just over 2,300 homes built as shown at Figure 4.3. While it is recognised that the higher figures in recent years account for the contribution of purpose-built student accommodation (PBSA) that can now be counted, this continues to reinforce the fact that there is a significant demand for housing in the area.

²³ *Ibid*, paragraph 289(c)

Figure 4.3: Housing Completions in Greater Norwich



Source: Greater Norwich Draft Plan, 2021

- 4.24 In this context, it remains the case that the calculated output of the standard method – at circa 2,027 dwellings per annum – is notably lower than the demand implied by recent levels of completions, falling circa 10% below the average recorded over the past five years and 16% below the annual average over the past three years. This serves again to highlight that it is underestimating the current full need or demand for new homes in the area, and further reinforces the importance of the Local Plan recognising a higher housing need and continuing to respond positively through the identification of adequate sites to meet needs in full.
- 4.25 A failure to ensure that supply continues to respond to demand will have consequences with regards the affordability of housing locally. In this context the Draft Plan notably confirms that *'affordability is a major barrier to home ownership locally'*²⁴. Where the issue of affordability is already recognised and worsening, the imperative is for the Local Plan to boost supply rather than curtail it.

²⁴ *Ibid*, paragraph 57

5. Conclusions

- 5.1 Broadland District Council, Norwich City Council and South Norfolk Council ('the Councils') are currently consulting on the Publication draft version of the Greater Norwich Local Plan ('the Draft Plan') until 22 March 2021.
- 5.2 As in the previous iteration last year, the Draft Plan continues to acknowledge a need for **2,027 dwellings per annum** throughout Greater Norwich over the plan period (2018-38). This reflects the '*minimum*' need derived from the standard method as of the base year, where its recent evolution – announced in December – does not affect this area. This is around 10% below the average rate of housing delivery over the past five years.
- 5.3 The Councils do, however, propose a requirement that is around 22% higher than the minimum need at around **2,475 dwellings per annum**, or 49,492 homes in total, the latter being approximately 5,000 more homes than originally proposed last year. Such a buffer is required by national policy to protect against delays or non-delivery of future supply, but the Councils have confusingly suggested that this buffer also responds to – and is at least partially justified by – demographic evidence of a greater housing need than implied as a minimum by the standard method.
- 5.4 While the acknowledgement of this evidence is welcomed, having been highlighted in our previous submissions last year, the Councils disappointingly appear to have made no attempt to quantify or robustly substantiate the actual scale of this higher need. This provides inadequate assurance that the proposed requirement is sufficient to meet housing needs in full, *and* contains an appropriate buffer to separately guard against risks to supply.
- 5.5 The Councils are advised to rectify this situation prior to the submission of their Local Plan by preparing a robust Housing and Economic Needs Assessment, to comply with national guidance and clarify the number of homes that are actually likely to be needed in Greater Norwich where this appears likely to – and is clearly allowed to – exceed the outcome of the standard method.
- 5.6 This process should involve an up-to-date assessment of the employment growth likely to result from ongoing investment and growth plans throughout Greater Norwich. This is unfortunately absent from the recently published Addendum to the Employment Land Assessment, which relies on a baseline forecast from Experian that unusually assumes minimal job growth beyond 2022. While the authors do proceed to adjust this forecast in developing an '*alternative growth scenario*' – ostensibly accounting for the City Deal, the opportunities associated with the emerging Tech Corridor and other economic assets – the approach taken appears grounded in national rather than local evidence and adds less than 500 extra jobs to the baseline over eighteen years to 2038. This would represent a poor return on investment, especially where Greater Norwich has recently proven to be extremely successful in translating investment into new jobs. Other strands of the Draft Plan apparently aim to sustain this success, in proposing to allocate over four times the employment land implied to be needed to accommodate the '*alternative growth scenario*' for example. This is likely to require a parallel increase

in housing provision, to ensure that investment is not constrained by a lack of available or suitable labour.

- 5.7 The extent of the economic ambition, and the opportunities presented by planned investment, mean that housing need can be reasonably expected to rise over the plan period. The Draft Plan acknowledges this prospect in the supporting justification for Policy 7.6, which sets out the Councils' conviction that one or more new settlements will be required to address housing needs in the future²⁵. In the context of the analysis and conclusions of this report, it is considered that the Councils should take a more proactive and positive approach to planning for the realisation of new settlement development. Where the Councils recognise that the lead-in time for new settlements spans a number of years, in order for such a new settlement or settlements to contribute to meet rising needs in the short-medium term there is a strong rationale for the Local Plan providing a firmer commitment to their role. This recognises specifically the expectation set out in the Draft Plan that a new settlement(s) will start delivering from 2026²⁶, which would fall within the timeframe of this Local Plan prior to a review which may follow up to five years after its adoption. Recommendations in this regard are set out in the overarching representations to which this technical report is appended.
- 5.8 Planning for a new settlement within this Local Plan will ensure a greater level of resilience in the supply of new homes over the medium-long term. Where this update has focused on housing demand issues, it is separately observed that the Councils' proposed supply of housing land substantively relies on both windfalls (1,296) and the parallel realisation of the South Norfolk Village Clusters Housing Site Allocations Local Plan for example (relying on a minimum of an additional 1,200 allocations). Where the provision of homes through these routes, as opposed to allocations within the Plan itself, is subject to greater uncertainty, the identification of a new settlement with a clear phased trajectory will offer an important mitigation measure.

²⁵ Draft Plan (2021), paragraph 395

²⁶ *Ibid*, paragraph 401

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Appendix 2 – Example New Settlement Policies

delivery of sustainable growth in South Lancaster would be through the development of a self-contained Garden Village which focuses on the delivery of high quality development that has a strong link with a series of open spaces and the wider countryside. As a result the proposals for residential and commercial development in South Lancaster will be expected to have the development principles of the Garden Village, as described in Policy SG1, at their core.

- 12.4 The Local Plan Policies Map has identified in South Lancaster a Broad Location for Growth under Policy SG1 in which the Council will prepare a specific Development Plan Document entitled ‘Lancaster South Area Action Plan’) which will form part of the wider Local Plan for the district.
- 12.5 Growth in South Lancaster will facilitate both significant residential and economic growth to meet long term residential and economic needs within the district. Development in this area will include the delivery of at least 3,500 new homes, of which 1,205 new homes during this plan period and the remainder to follow through future plan periods.
- 12.6 Furthermore, the Garden Village proposes a range of employment and commercial opportunities to attract business, investment and jobs into the district. This includes the realisation of the Lancaster University Health Innovation Campus which is considered to be of regional economic importance to the North West, the delivery of a new local service centre which will include opportunities for convenience and comparison retailing (to meet evidenced local needs only) and the investigation of further employment land to allow for business development.

Lancaster South Broad Location for Growth (including Bailrigg Garden Village)

POLICY SG1: LANCASTER SOUTH BROAD LOCATION FOR GROWTH (INCLUDING BAILRIGG GARDEN VILLAGE)

The Council has identified a broad location for growth in South Lancaster, including for the development of the Bailrigg Garden Village, on the Local Plan Policies Maps. This will be a major mixed-use development which focuses on the delivery of at least 3,500 new houses, a number of opportunities for employment and economic opportunities including the delivery of Lancaster University Health Innovation Campus and wider University related expansion.

Key Growth Principles for Development in the Broad Location for Growth

The Council has defined a range of principles which will be at the very core of the planning and development in South Lancaster and for the Garden Village. These will be explored in more detail via the forthcoming Lancaster South Area Action Plan DPD for this area. These principles include:

1. Involving local communities in pro-active consultation about the creation of new development.
2. Securing high-quality urban design which promotes sustainable, attractive places to live, defining a sense of place and creates a sense of community for its new residents.
3. Seeking a modal shift in local transport movements between South Lancaster, the Garden Village, Lancaster University Campus and Lancaster City Centre and beyond

- into the employment areas of Morecambe and Heysham through the delivery of a Bus Rapid Transit System and Cycling and Walking Superhighway network.
4. Delivering a wide range of market and affordable housing, in terms of type and tenure to ensure that opportunities to live in the Garden Village are available to all sections of the community and contribute significantly to the creation of cohesive, balanced communities and thereby assist the district in meeting its evidenced housing needs within the Local Plan period.
 5. Ensuring that the necessary infrastructure to achieve sustainable growth is delivered in the right place, at the right time, to address strategic constraints to the delivery of future development in the South Lancaster area.
 6. The creation of sufficient areas of high quality open spaces to provide a distinct sense of place and deliver a network of green corridors and walking and cycling routes across the South Lancaster area to the benefit of the local environment and residents. The delivery of such spaces and routes should make for distinct areas of separation between the new development and the urban edge of Lancaster, Bailrigg Village and Galgate and give potential to bring forward a new country park.
 7. Development proposals will need to take account of the recommendations for mitigating harm and/or maximising enhancements as set out in the Council's Heritage Impact Assessment for this area.
 8. The creation of healthy and cohesive communities through the delivery of high quality development and the correct levels of services, open space and infrastructure which is provided in safe and accessible locations.
 9. The sympathetic masterplanning of new facilities and growth within the campus of Lancaster University for a range of educational facilities, student accommodation, visitor accommodation and ancillary uses located primarily at the Bailrigg Campus, the Lancaster University Health Innovation Campus and in appropriate locations within the wider University estate in the context of its sensitive landscape setting.
 10. Safeguarding Lancaster University's Bailrigg Campus, by ensuring that development in South Lancaster and for the Bailrigg Garden Village is well planned and does not have an adverse impact on the University Campus and its setting.
 11. Taking proper account of the need to design new development to minimise its contribution to, and the impacts of, Climate Change and to ensure that new development is resilient and adaptable to the effects of Climate Change.
 12. Managing water and run-off to safeguard development, assuring public safety and amenity with active measures within new development to reduce flood risk downstream for both existing and new residents and businesses.
 13. Offering opportunities for national housebuilders to work alongside local construction firms and encourage training opportunities for local people, particularly through the construction phases of the development. The Garden Village should also include opportunity for the provision of self-build and custom-build properties.
 14. To ensure innovative urban design both in terms of the layout and density of new development and the specific design of new buildings. This should include the application of appropriate new technologies for buildings and transport where possible. Proposals should investigate opportunities for localised heating systems in the South Lancaster area.
 15. Addressing longstanding constraints and capacity issues in the strategic and local road network through improvements to traffic management and physical interventions to increase network capacity and advantage sustainable travel. This will involve the re-configuration of Junction 33 of the M6 to afford direct motorway

access into the South Lancaster area and remove traffic from Galgate which is currently designated as an Air Quality Management Area (AQMA).

To support the delivery of growth in the South Lancaster area, including development of the Bailrigg Garden Village, there will be a requirement for a wide range of both locally important and strategically important infrastructure, including new highways, public transport network, education provision, new local centre(s), open spaces and green network. These are set out in Policy SG3 of this DPD and will be addressed in more detail through the preparation of the Lancaster South Area Action Plan DPD.

Proposals will need to demonstrate that no Internationally designated sites would be adversely affected by development either alone or in combination with other proposals, as per the requirements of Policy EN7 of this DPD. In view of the potential for likely significant effects as a result of this allocation, development proposals must accord with the requirements of Appendix D of this DPD.

Mechanism for Delivery of Growth in South Lancaster, including Bailrigg Garden Village

The Council will prepare and implement a specific Development Plan Document (DPD) for this broad location for growth, entitled the 'Lancaster South Area Action Plan DPD'. The purpose of the forthcoming DPD will be as follows:

- A. To provide additional detail on how the Key Growth Principles set in this policy will be delivered;
- B. To set out a Spatial Development Framework as a basis for further masterplanning, to help guide the preparation of future planning applications and against which future development proposals and planning applications will be assessed; and
- C. To facilitate and support the co-ordination and timely delivery of the infrastructure necessary to facilitate growth in this location.

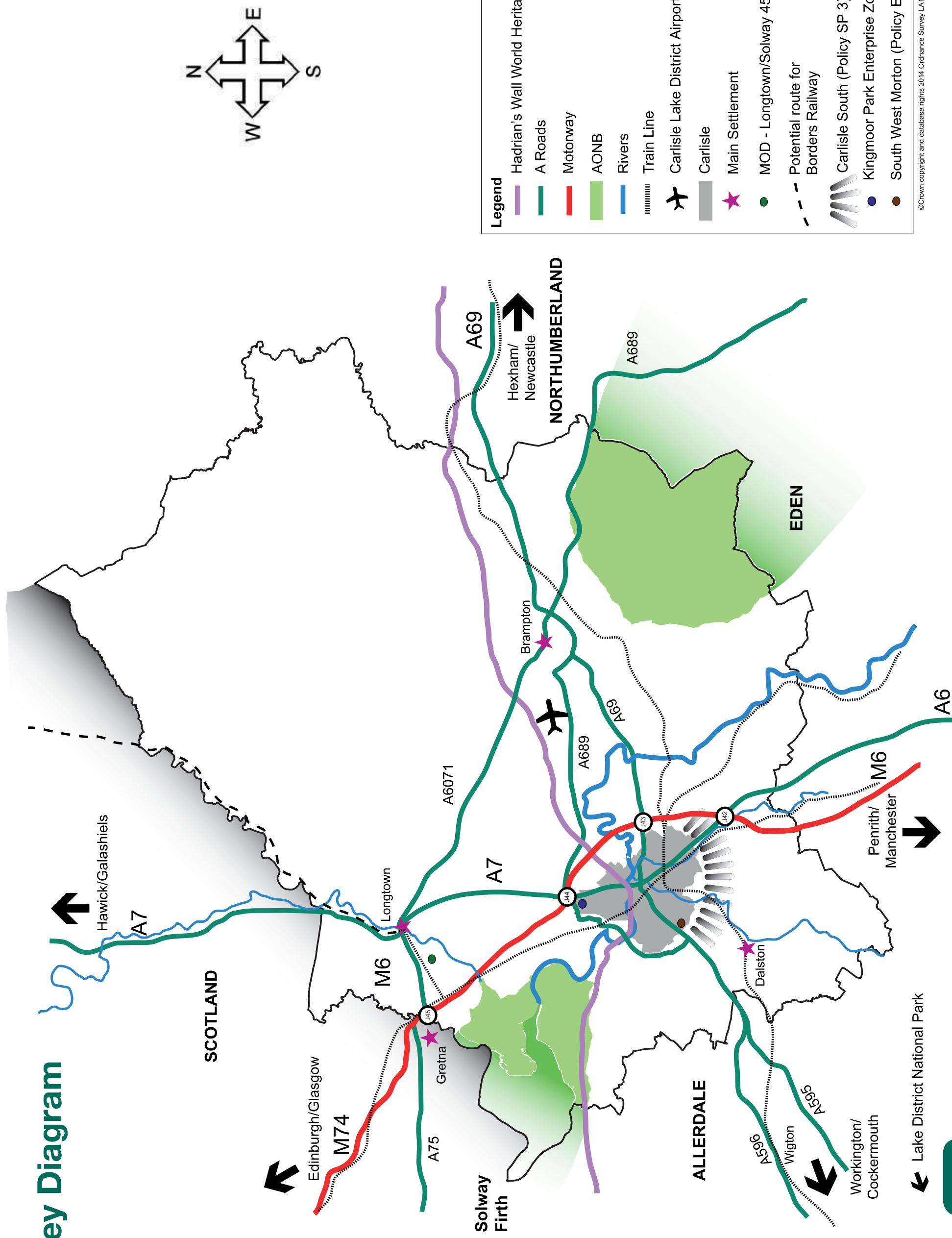
Development within the broad location for growth in advance of the Lancaster South Area Action Plan DPD will be permitted provided that:

- 1. There would be no prejudice to the delivery of the wider Bailrigg Garden Village (including its infrastructure requirements) and would not undermine the integrated and co-ordinated approach to the wider Bailrigg Garden Village development; and
- 2. That the development would conform with and further the Key Growth Principles described in Policy SG1; and
- 3. That the opportunities for sustainable transport modes have been fully considered and that the residual impacts upon the transport network will not be severe.

The potential for the future re-configuration of Junction 33 of the M6 and highway network improvements in South Lancaster will be an integral part of this forthcoming DPD.

To ensure the timely delivery of the Bailrigg Garden Village, work on the wider DPD has already commenced and is anticipated to be ready for adoption within the first five years of the plan (i.e. before 2022).

Key Diagram



Legend

- Hadrian's Wall World Heritage Site
- A Roads
- Motorway
- AONB
- Rivers
- Train Line
- Carlisle Lake District Airport
- Carlisle
- Main Settlement
- MOD - Longtown/Solway 45
- Potential route for Borders Railway
- Carlisle South (Policy SP 3)
- Kingmoor Park Enterprise Zone (Policy EC 1)
- South West Morton (Policy EC 1)

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Policy SP 3 - Broad Location for Growth: Carlisle South

A broad location for growth for a major mixed use development, focusing on housing, is identified on the Key Diagram at Carlisle South. The release and phasing of Carlisle South will be informed by a Development Plan Document inclusive of an Infrastructure Delivery Strategy.

To support the housing development, there will be a requirement for primary and secondary schools, employment and retail sites, community facilities, open space, green and other infrastructure including highways and transport.

The development of this area will be in accordance with a masterplan which will be approved as a Development Plan Document. The study area for the masterplan will include the whole of the undeveloped extent beyond the city's existing southern edge and any existing allocations.

The purpose of the masterplan will be as follows:

1. to provide more detail on how and when the strategic requirements set out in this policy will be delivered;
2. to set a framework to guide the preparation of future planning applications;
3. to provide a framework against which future planning applications will be assessed;

4. to enable and support the co-ordination and timely delivery of infrastructure provision; and

5. to facilitate the delivery of land release to help address the imbalance of employment land between the north and south of the City.

The potential for the future development of a southern relief road linking Junction 42 of the M6 with the southern end of the A689 will be an integral part of the masterplan.

To enable a comprehensive and coordinated development approach, piecemeal or unplanned development proposals within the area which are likely to prejudice its delivery including the infrastructure required for the area will not be permitted.

To ensure that Carlisle South is deliverable when required, work on masterplanning the area will commence in the early years of the plan period.