

**Proposed Residential development on land at  
Farmland Road, Costessey**

**Response to Regulation 19 Consultation of the  
Greater Norwich Local Plan**

**on behalf of Mrs Katrina Kozersky and  
Alfred Charles Homes Limited**

Ref: GNLP 0238

## 1. Introduction

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

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

**1.3** It is considered that the draft Plan is unsound, as the strategy proposed is neither justified nor effective. The site at Farmland Road, Costessey, offers an appropriate opportunity to deliver growth in a manner that is appropriate to the sustainable objectives of the emerging Local Plan and NPPF. By undertaking a limited form of development on this site in a sustainable manner it would support the emerging Local Plan in paving the way for the region to become the UK leader in clean growth whilst raising the standards for design and placemaking.

## 2. Objection to proposed strategy

### Justified

**2.1** The NPPF indicates that, to be justified, a Plan should set an appropriate strategy based on robust and credible evidence, with suitable consideration given to reasonable alternatives. It is considered that the proposed strategy is not appropriate and is incompatible with the overall purpose of the plan, in particular, the delivery of sustainable development which meets the challenges of climate change and supports ambitious local and national targets for carbon neutrality. The proposed distribution of growth is not thought to be suitably forward thinking to facilitate the transition to a post-carbon economy, and the emergence of the region as the UK leader in clean growth. Furthermore, the proposed strategy is not considered suitable to deliver beautiful places or spaces.

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

**2.3** We believe the proposed strategy should focus on delivering opportunities adjacent to the built-up areas of Norwich with an ability to connect to existing local services and access areas of open space and access to the countryside.

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

**2.7** As previously referred to in earlier representations, the site benefits from facilities in Norwich and residents have access to a wide range of shop, services and Leisure facilities, medical centre and a strategic employment centre. The HELAA exercise undertaken concluded that the site is considered

suitable for residential development, and we agree with the Site Proposals Consultation document that the site would be an extension of existing development in New Costessey and is largely unconstrained.

**2.8** In order to meet climate change targets, housing need, and support sustainable employment and economic growth, more is required than delivering housing units. Rather, the focus is shifted to the creation of beautiful places and vibrant, resilient communities. A limited amount of residential development on this site can deliver a range of housing opportunities as well as significantly contribute to the green infrastructure and enhance the ecological value of the river valley as well as public access to it.

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

**2.10** We believe with a suitably designed scheme, which recognises the constraints of the site could be delivered in such a way as to minimise landscape harm with the ecological and recreational benefits it potentially would bring. For the purposes of paragraph 47 of the NPPF, the Site is deliverable as it is available now; achievable with a realistic prospect of delivering housing within five years.

**2.11** The intention would be to develop proposals that would be led by the green infrastructure and ecological value of the river valley. It would seek to explore how much of the site could be used to enhance the informal recreation value of the river valley.

### **Effective**

**2.13** In order to be considered effective, the NPPF states that the proposed strategy should be deliverable over the plan period. It is proposed to meet housing need over the plan period through the allocation of new sites, however the vast majority of need is proposed to be met through the rolling forward of existing allocations totalling 75% of the overall housing figures. By definition, those sites being carried forward have failed to deliver during the previous plan period, as such they should be subject to enhanced scrutiny and robust evidence of their delivery within the new plan period required.

**2.14** It is not considered that such evidence has been sought or provided for a number of sites, and so their inclusion within the emerging plan cannot be justified. Indeed, a number of allocations proposed to be carried forward do not have a developer on board, currently support other uses, and in many instances have already been carried forward from previous Local Plan iterations. The continued reliance on such sites undermines the plan making process and places the strategy for growth at risk as a result of continued non-delivery and subsequent land supply impacts opening the door for opportunistic largescale development which undermines place-making, sustainability and climate resilience.

**2.15** As a key focus area for growth, those sites proposed for allocation should robustly evidence their delivery. It is noted that the current iteration of the GNLP proposes the removal of a small number of previous allocations throughout as a result of insufficient evidence of delivery, and this is welcomed. However, it is considered that there are a number of other sites which have the same issues and should also be removed.

**2.16** Demonstrating deliverability is fundamental to achieve sustainable, well-planned development. As has been evidenced with Local Plans across the country, proposed allocations, particularly those for large-scale housing, can falter where it is considered that sufficient work has not been undertaken to robustly demonstrate their viability or deliverability. In order to provide an effective strategy that would deliver the

requisite housing within the plan period to meet local needs, it is considered necessary to remove a number of allocations proposed to be carried forward and allocate alternative sites.

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

**2.18** It is recognized that the site has been the subject of a dismissed planning appeal for a development of 83 dwellings (Appeal Ref: APP/L2630/W/18/3204808 & APP/L2630/W/18/3204810) however, we believe that a limited form of development could still be achieved despite the concerns raised by the Planning Inspector. The previous proposals were supported by all of the relevant and necessary documents, and the application was reported to committee with planning officer's full support, with a recommendation for approval. Importantly, there were no statutory objections to the applications in respect of matters such as wildlife and ecology; flooding and drainage; design; contamination; landscaping; and highways.

### **3. Conclusions**

**3.1** The GNLP in its current form is not considered to be sound as the strategy fails to adequately deliver on the overall purpose of the plan, in particular addressing the challenges of climate change and supporting ambitious local and national targets for carbon neutrality. The proposed distribution of growth is not thought to be suitably forward thinking to facilitate the transition to a post-carbon economy or to create truly beautiful places or spaces. The draft GNLP recognises the need to deal with the challenges of climate change and carbon neutrality and adapt accordingly, however it seeks to deliver growth through a traditional delivery model which perpetuates inappropriate development.

**3.2** Additionally, the strategy is considered to be ineffective as there is a significant reliance upon sites which have failed to deliver during the current plan period, with some sites having been originally allocated in previous iterations of the Local Plan, dating as far back as 2004. Continuing to roll forward sites which have failed to deliver in line with the housing trajectory places the strategy for growth at risk and undermines the Plan led approach. Insufficient evidence has been provided to demonstrate the ability of these, and other sites, to deliver within this plan period, with a number of sites having no promoter or developer on board.

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