



Our ref: Q260450
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The Greater Norwich Local Plan 2045 Team (Floor 5),
County Hall,
Martineau Lane,
Norwich,
NR1 2DH

By Email: GNLP@norfolk.gov.uk

Dear Sir/Madam,

GNLP 2045 Regulation 20 Scoping Consultation

On behalf of Halsbury Homes Ltd ("Halsbury"), we set out below our responses to the consultation questions for the GNLP 2045 Regulation 20 Scoping Consultation ("the GNLP Consultation").

As you will be aware, Halsbury responded to the Call for Sites earlier this year, submitting details of its Land at Silfield site¹ (Site 25755). Halsbury controls over 880 hectares in a single contained greenfield site which is located on both sides of the A11, comprising North Silfield and South Silfield. It is promoting this site for Silfield New Town which would form one single contiguous development and could deliver up to 12,000 high quality new homes and an appropriate mix of other uses, located at the heart of the A11 Cambridge to Norwich growth corridor.

Halsbury will act as the master developer and would deliver the initial infrastructure required to 'unlock' the land and facilitate development of the entire site. Halsbury will engage with a number of large national, established housebuilders in the Norfolk area and a number of SME housebuilders, as well as securing residential social landlords to deliver the affordable housing element with the intent of exploring the possibility of additionality if need requires.

Question 5 - How can the GNLP 2045 support the development of brownfield sites? What development types would you support as part of our updated Growth Strategy?

Whilst the GNLP 2045 can endorse a brownfield-first approach and seek to maximise the use of brownfield sites in accordance with national policy, as the GNLP Consultation² recognises there is an overall lack of significant, strategic brownfield sites capable of accommodating housing delivery at scale. In addition, brownfield sites are often very challenging to deliver which typically generate abnormal costs in terms of ground conditions, contamination, land assembly and infrastructure.

¹ Postcode: NR18 9NQ; Grid Reference: TM 11539 98625; Easting: 611539, Northing: 298625

² Paragraph 35 of Chapter 4 (Growth Strategy and Settlement Hierarchy)

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The GNLP Consultation³ identifies the requirement to plan for c. 20,000 more homes and associated development over the plan period. The recognition at paragraph 31 of the potential role of extensions to existing towns and standalone new settlements is strongly supported by Halsbury.

Furthermore, this approach aligns with the recently updated NPPF which places greater emphasis on the role of strategic sites. Policy PM2 (Local Plans) states that local plans should set out a positive vision and spatial strategy for the plan area which, amongst other things, reflects longer term expectations and, where appropriate, identifies specific strategic site proposals.

Both policy HO4 (Land for strategic site development) and policy HO13 (Build out of residential and strategic sites) of the NPPF identify the role that strategic sites can play in boosting housing delivery.

Question 6 - What areas do you consider to be appropriate for additional growth and what infrastructure, services and amenities would need to be prioritised to enable growth in these locations?

Land at Silfield is an appropriate location for a new settlement (Silfield New Town), given its location at the heart of the A11 Cambridge to Norwich growth corridor. An initial phase of c. 1,500 dwellings could be delivered in North Silfield prior to any requirements for significant infrastructure works, thereby reducing the lead-in time for the delivery of new homes.

Development of the wider Land at Silfield site would inevitably require further infrastructure to enable growth. This would include the provision of a new grade-separated junction onto the A11, providing benefits for existing residents of Wymondham as well as residents of Silfield New Town and incorporating prioritised Bus Rapid Transport connectivity as part of a new bus system from North Silfield to Wymondham rail station (< 5 minutes) and east into Norwich and the wider public transport system. In addition, active travel/footpath connections to allow easy walking access into the existing settlement of Wymondham and surrounding countryside.

A comprehensive network of green and blue infrastructure including BNG, formal and informal open space would also be provided.

Question 8 - What measures could the councils take to improve housing delivery rates through the local plan?

As the GNLP Consultation⁴ recognises, there are significant viability pressures and challenges to delivery in the Greater Norwich area, in addition to the broader macro-economic challenges that developers must face.

It is vital that local plan policies which set out local standards and developer contributions do not undermine the viability and delivery of development and thereby delay the approval and delivery of new housing. Further details on these matters are provided below in response to subsequent questions.

Question 10 - What should the GNLP 2045 do to assist the delivery of:

- **affordable housing**
- **accessible and adaptable homes**
- **specialist housing**
- **gypsy and traveller and travelling showpeople sites**
- **self- and custom-build housing**

³ Paragraph 30 of Chapter 4 (Growth Strategy and Settlement Hierarchy)

⁴ Paragraph 4 of Chapter 7 (Housing)



Policy PM12 (Developer contributions) of the NPPF states that policy requirements, including the levels and types of affordable housing provision required, should be set at a level that allows for the planned types of development and sites to be deliverable, maximising certainty and reducing the need for viability assessment at the decision-making stage.

The policy also explains that plans should set out the circumstances in which review mechanisms will be used for development proposals where contributions are proposed to be reduced below the requirements set out in plan policies, in accordance with planning practice guidance. Plans should clearly set out the processes and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to maximise policy compliance.

It is vital that the requirements for affordable housing and other housing types set out in the GNLP 2045 do not undermine the viability and delivery of development, particularly in respect of strategic sites which typically entail extensive infrastructure work at an early stage to facilitate development.

Question 17 - Should the GNLP 2045:

Set the most demanding local standards possible for water efficiency?

Include higher or new standards for nature recovery and allocate sites for nature recovery or biodiversity enhancement?

Identify sites for enhanced green infrastructure, including Suitable Alternative Natural Greenspace, and set local green infrastructure standards?

Policy PM13 (Setting standards) of the NPPF states that quantitative standards set through development plan policies should be justified and evidence-based and not cover matters that are already addressed by Building Regulations (subject to three specific exceptions where justified).

In addition, policy PM15 (Examining local plans and minerals and waste plans) requires that plans do not include policies which duplicate, substantively restate or are inconsistent with the content of national policies for decision-making.

It is vital that local standards set out in the GNLP 2045 do not undermine the viability and delivery of development, particularly in respect of strategic sites which typically entail extensive infrastructure work at an early stage to facilitate development.

I trust this is of assistance and you will keep us updated on the progress of the plan.

Yours faithfully

Sean Bashforth
Senior Director