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GNLP 2045 Scoping Consultation Submission of Representations on behalf of M Scott Properties

Introduction

These representations are submitted on behalf of M Scott Properties (MSP) and provide comments on the GNLP 2045 Regulation 20 Scoping Consultation. We fully support the ambitions of the GNLP to provide growth to strategic areas within the districts.

Background

MSP is working in partnership with a landowner, and therefore have an interest in land to the east and west of the A47 and north of the A11, around the settlements of Bawburgh, Little Melton, Cringleford and the Norwich Research Park growth area (known as Melton Park). The land, which is in single ownership, extends to approximately 1,000 acres and has the potential for strategic growth encompassing residential, retail, employment and community uses.

Question	Response
1. Are there any other key Strengths, Weaknesses, Opportunities or Threats that should be included in the SWOT analysis for Greater Norwich? Why?	We are in support of the SWOT analysis as a way of understanding an area and informing the vision and future objectives for the area. In particular, we would like to emphasise the importance of: • Major road infrastructure improvements could increase capacity for growth in well-connected locations • Significant viability pressures which can affect the location and deliverability of growth • Co-location of infrastructure and housing around emerging economic clusters to create sustainable and desirable places. • World leading higher education and research sectors • Major challenges around the delivery of brownfield sites restricting growth coming forward in highly sustainable locations

2. Is there any other baseline data that we should consider when developing our SWOT and analysis of the key issues facing Greater Norwich?	Market and sales prices alongside construction and major infrastructure costs could be considered to ensure sites are viable and have the ability to meet the aspirations of the policies. Accessibility, in particular connectivity and sustainable transport from local settlements to strategic employment and retail areas could be considered The Department of Transport Connectivity Tool, or similar methods to understand the existing and potential connectivity could be inform residential led growth areas.
3. Do you agree with the proposed broad structure of the GNLP 2045 above? If not, please suggest an alternative approach or approaches which could be taken to structuring the plan.	We believe the proposed GNLP 2045 structure is a logical way of locating strategic growth in the most suitable and sustainable locations, allocating specific sites and creating site specific policies. The proposed structure follows similar methods to the adopted GNLP, which overall is a very clear and well informed document. We support the digitalisation of the document, and the use of clear measurable and deliverable outcomes.
4. Which elements of the existing growth strategy and settlement hierarchy do you think have and have not worked well?	We believe the existing growth strategy and settlement hierarchy have located growth in available and suitable locations to date. The focus of the majority of growth around the Strategic Growth Areas, where there is a range of existing infrastructure, employment and amenities / services, as well as the Main Towns (the 'blended approach'), has enabled the required level of growth to be accommodated in a sustainable manner; striking an appropriate balance between rural and urban development. The suitability of the existing growth strategy is highlighted by the majority of key sites coming forward in accordance

	with the objectives of the GNLP< notwithstanding challenging economic conditions.
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?	Brownfield sites present a number of challenges in relation to delivery, not least those associated with viability. Site specific policies should recognise this, factoring infrastructure and other costs, which without a full and proper understanding can impact viability and delivery. In terms of the types of development, we would support residential led mixed use developments, which are capable of utilising and enhancing existing infrastructure, employment, services and amenities, in a sustainable manner, either as stand-alone developments, or as part of a wider strategic vision.
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?	Residential led growth should primarily be located around existing and expanding strategic employment opportunity areas, the strategic road network where infrastructure upgrades have (or are planned to be delivered) sustainable transport networks and existing community infrastructure, such as educational and health facilities. Providing housing near strategic areas of employment will create the opportunity to enhance and deliver sustainable modes of travel, including walking and cycling, in a cost effective manner. Locating growth near the strategic road network which has been subject to significant upgrades in recent years, will reduce the need for large infrastructure improvements, and should not contribute to congestion around the more isolated settlements. The utilisation of existing infrastructure will enhance the viability of development, enabling quick delivery. This approach is considered essential to ensure the housing needs are met during the plan period.

	Combining a mixture of employments uses adjacent to residential growth will allow sustainable neighbourhoods to be formed providing all the necessary amenities within the local area, supporting economic growth. This strategic approach to development will also enable multiple developments to contribute to required upgrades in terms of infrastructure upgrades, services and amenities in a proportionate manner; helping ensuring a greater range and number of developments are viable and therefore can be delivered. Given the challenges associated with brownfield development, and the need to drive development towards the most sustainable locations, it is likely that the Norwich fringe will remain the main focus, in part, for growth. In light of comments above relating to growth being in locations close to strategic employment clusters, as well as the improved strategic road network, the area to the west of the A47 and north of the A11 (Melton Park), is considered to be an ideal location for growth. It is one of the few locations around the perimeter of Norwich which has not been subject to growth in recent years. The area is in close proximity to Norwich Research Park (the principal employment area in the locality), as well as the upgraded A11 and A47. As well as utilising existing infrastructure upgrades, development in this location would provide an opportunity to further improve existing infrastructure, services and amenities. For example, development could promote enhanced connectivity between locations such as Little Melton and NRP, whilst also providing high-quality housing in close proximity to the employment area;
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	increasing its attractiveness to investors and developers.
7. Should any changes should be made to the settlement hierarchy through the new local plan? Please explain your reasons.	We consider the settlement hierarchy should be amended. A mix of new growth should be appropriately portioned throughout the GNLP area, providing residential development in areas of strategic growth. We support the 'early policy direction of thoughts' detailed in the Greater Norwich Development Partnership's Settlement Hierarchy Topic Paper. The document states that whilst the NPPF supports a settlement-based approach to growth, it should place greater emphasis on the relationship between settlement hierarchy, accessibility and transport connectivity. When identifying the settlement hierarchy, as well the presence of existing services and facilities within settlements, we support consideration of how people can access homes, employment, services and infrastructure across the wider area through the use of sustainable modes of transport. We would further support the use of the Department for Transport Connectivity Tool and other evidence sources to help demonstrate how development in certain locations, and associated improvements to connectivity, can further contribute to achieving sustainable development objectives. In this regard, the comments that the traditional settlement hierarchy approach is unlikely to be responsive to changes that may affect the sustainability of individual settlements e.g. infrastructure provided as a result of growth, new/improved public transport, the opening of the NDR, dualling of the A47, is supported and applies to the area to the west of Norwich.

8. What measures could the councils take to improve housing delivery rates through the local plan?	Improved viability for strategic sites through site specific policies to allow for site specific constraints, related infrastructure requirements or aspirational community projects. Handling and response times, particularly for consultees during consultation processes, could be improved to reduce the time of pre and planning applications, reserved matters and infrastructure agreements.
9. The plan must include 10% of homes on both small and medium-sized sites. Should the plan aim to allocate a higher proportion than this and, if so, why?	
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	The delivery of strategic sites which contribute significantly to the housing need, including specialist housing, can be assisted by creating a site-specific policy considering its constraints and required infrastructure. This would assist with the viability of the site to ensure the target number of housing is met, and reducing the risk of a viability issue being raised further into the Local Plan process. Specific minimum requirements should be detailed, with any additional costs over typical standard housing factored into the allocation of the site and overall viability of the Local Plan. Self & custom build homes should be allocated in small and rural settlements to reflect the existing nature of development and demand. Small allocations of self & custom build homes located in villages will be better suited to SME developers, as opposed to strategic sites developed by regional and national housebuilders.
11. Should the GNLP 2045: • Provide additional coverage of rural housing and development outside settlement limits beyond that contained in the draft NPPF? • Retain aspects of existing local policy concerning housing outside settlement limits, such as self-build and custom-build housing, barn	Rural housing should be considered in settlements that: • Are located in or near areas of significant growth • Are located near the strategic road network, public transport links, or the cycle and pedestrian network • Benefit from existing facilities such as education and health, or that

and other rural building conversions, replacement dwellings, the subdivision of existing dwellings, and dwellings connected to rural enterprises?	development can provide/enhance these facilities Self and custom build housing, conversions and replacement dwellings should be located in suitable smaller settlements to retain the rural character. Smaller development sits on the edge of settlements are more suited to SME developers.
12. How should the GNLP 2045: • deliver the right types and mixes of flexible and adaptable commercial spaces in the right places? • help our growth sectors to thrive, possibly including protection of site-specific industries? • support other opportunities for economic growth, including the rural economy? • strengthen skills and workforce development? • plan for freight and logistics? • support small businesses and start-ups?	Growth should be directed near current identified areas and infrastructure. The spatial strategy and identification of suitable locations for growth, should recognise the link between economic growth and the provision of high quality housing and other everyday services, in easily accessible locations that are well connected by sustainable modes of transport. The plan should adopt a strategic approach to growth, identifying the opportunity for larger areas / clusters rather than traditional settlements that are, or can be, well connected to employment areas, to be the focus for growth.
13. How should the GNLP 2045: • help strengthen the city, town, district and local centres? • deal with thresholds for retail impact assessments? • address the evening and the late-night economy in the city centre?	
14. How can the GNLP 2045 support the ongoing development of tourism, whilst responding sensitively to the local area?	
15. How can infrastructure delivery be well co-ordinated and funded to support growth?	The delivery of strategic infrastructure should be co-ordinated throughout the plan process, consulting with the site-specific land owners and consultees to ensure any infrastructure is feasible, deliverable and adequately funded. Growth should be located in proximity to areas of strategic infrastructure to assist with the delivery and maximise the

	potential opportunities through the Local Plan. However, as a first priority and as recognised in the Greater Norwich Development Partnership's Settlement Hierarchy Topic Paper, Infrastructure improvements, such as the dualling of the A47, should be recognised in the preparation of the settlement hierarchy, and utilised to secure well connected and viable sustainable development that is deliverable, when compared with new settlements, in the early years of the plan period.
16. How should the GNLP 2045 support • Improved accessibility to housing, employment, services, sports and other community facilities? • Delivery of wastewater treatment capacity and address nutrient neutrality? • Clean power and net zero objectives?	The Local Plan has the ability to allocate strategic sites that are capable of providing significant community benefits to new and existing residents. Wastewater treatment improvements are the responsibility of Anglian Water and the cost of upgrading infrastructure should not be passed to developers, otherwise there is a significant change development will not be viable. Whilst aspirations for clean power and net zero objectives are supported in principle, any associated additional costs should be considered as part of the Local Plan's viability.
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?	Nutrient Neutrality has caused delivery issues within the current Local Plan. The ownership should be redirected to the water companies instead of the developers, with the ability for financial contributions towards any maintenance. Higher standards will have financial implications on the development of sites, creating unviable sites and leading to the loss of potential housing. Sites can be allocated to enhance the green infrastructure within the area, however consideration should be given on how strategic sites deal with the quantum of Natural Greenspace if there are other strategic infrastructure requirements.

	Pooled S106 contributions would be an appropriate way to provide environmental gain in the most suitable locations.
18. How should the GNLP 2045 plan for high quality design that promotes sustainability and responds to local landscape and townscape character and the historic environment?	Supplementary Planning Documents are a positive way of influencing the design of developments. Design codes for growth areas or strategic sites could be used to illustrate the required parameters of built form, architectural types, and landscape mitigation strategies to ensure development responds positively to the local landscape and townscape character and the historic environment.
19. Should: - the scope of any of the proposed evidence studies be changed? - any other evidence be updated or commissioned to prepare the GNLP 2045?	The proposed scoping is considered to be extensive and should be sufficient to direct growth in the most suitable and sustainable areas.
20. Do you consider that our proposed approach to engagement at the statutory consultation stages correctly identifies: - the purpose of each stage of engagement? - the target audience(s) at each stage? - appropriate engagement methods throughout?	We support the level of consultation proposed, reiterating the need for stakeholder and consultee engagement throughout the Local Plan process in a timely and efficient manner.
21. Are there any additional methods of engagement you would like to see included in our engagement strategy – particularly where these would help us to support hard to reach groups?	
22. Is there anything else you think is missing from this consultation or you would like to comment on in relation to the GNLP 2045?	

Yours sincerely,

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