

Date: 10 March 2020
Your Ref:
Our Ref: 004/2019/06
Email: john@johnlongplanning.co.uk
Tel: 01508 538218

Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX

Dear Local Plan Team

Persimmon Homes (Anglia) Response to Greater Norwich Local Plan (Regulation 18) Policy EAS 1 Land South and East of Easton

I am instructed by Persimmon Homes (Anglia) to respond to the current Greater Norwich Local Plan (Regulation 18) consultation specifically in relation to Policy EAS 1: Land south and east of Easton. Persimmon Homes control the majority of the site (excluding an area of the allocation to the north of Dereham Road, which is promoted separately by Orbit Homes) and which has the benefit of outline planning permission.

Background

The original Easton outline application 2014/2611/O was consented on 1 November 2016. The original outline application site (excluding an area of land to the north of Dereham Road, which is being promoted by Orbit Homes for 64 homes) extends to approximately 45 hectares and the consent limits the total number of homes to 890 units.

The original outline application requires compliance with approved parameter plans, including for layout, land use and density and a Design Code. The Design Code for the site was approved on 16 December 2019. A reserved matters application for the first phase of the scheme is being prepared and will be submitted for approval shortly.

Persimmon Homes (Anglia) aim to be efficient in the use of land (as required by the NPPF) as it prepares its reserved matters applications and considers that there may be future opportunities to accommodate additional sustainable residential development above that which is currently specified in the emerging Local Plan policy (1,044 homes) and this potential opportunity should not be compromised by the Policy.

It is acknowledged that to secure any future additional 'uplift' in residential unit numbers a new consent would be required, which would need to take account of any new policies adopted since the outline consent was granted; including contributions to CIL and providing 'on-site' requirements such as open space, access, utilities infrastructure/capacity reinforcement etc. necessary to support the 'uplift'.

It is also acknowledged that any application for an 'uplift' in unit numbers will need to be supported by technical information to demonstrate that the scheme can be accommodated within infrastructure limits, or mitigations can be put in place (i.e. utility reinforcements) and without having a residual significant environmental impact. An EIA Addendum may also need to be prepared, to consider the environmental impacts of the uplift, taking into account cumulative effects, including recent planning commitments not considered at the outline stage; new legislation and changes in baseline information

Response to GNLP Consultation – Policy EAS 1: Land South and East of Easton

Persimmon Homes (Anglia) supports the Greater Norwich Local Plan's acknowledgement that the site EAS1 : Land south and east of Easton is capable of accommodating additional housing units beyond the previous allocation figure of 900 units. This is evidenced by the fact that a scheme of 890 units has been permitted and a further scheme for 64 units is pending. However, it is not altogether clear how the figure of 1,044 homes has been derived and what it is comprised of or what assumptions have been made.

Persimmon Homes (Anglia) notes that the Policy EAS 1 is partially updated to reflect additional housing numbers permitted through the determination of the outline planning application (ref:2014/2611/O) and it



is assumed likely to be permitted through the determination of the Orbit Homes planning application but these two figures do not equate to the Policy's suggested housing figure.

Also, Persimmon Homes (Anglia) note that the rest of the policy's 'requirements' remain unchanged from the previous policy and appear to ignore the fact that planning permission has been granted (in the case of the Orbit scheme is likely to be likely granted), with conditions and a section 106 obligations package which renders many of the policy 'requirements' superfluous or obsolete, as they are already addressed.

Persimmon Homes (Anglia) considers that the Policy should be redrafted to reflect the fact that planning consent has been granted; and that many of the policy requirements have been met through the determination of the planning application and are no longer relevant to any potential future application(s). It is accepted that there may be reticence to do this until the scheme has been lawfully commenced, but Persimmon Homes (Anglia) are confident that this will be done prior to the adoption of the Local Plan.

However, notwithstanding the above, the Local Plan should also acknowledge that the site may be capable of accommodating more than the suggested 1,044 units in the Policy. Persimmon Homes (Anglia)'s experience at Hethersett and other strategic sites is that the need to make the best and most efficient use of land often results in the housing numbers controlled by outline consents being met by using less land than anticipated by the outline consent, resulting in land being available within the red line of consented sites, which could reasonably accommodate further sustainable development. Persimmon Homes (Anglia) suggests that the emerging Local Plan should not rule this opportunity out in Easton and therefore suggests that the Policy's housing figure could be specified as minimum or an 'at least' figure.

Suggested changes

Persimmon Homes (Anglia) suggests that rather than simply roll forward the previous Local Plan allocation and Policy EAS 1: Land south and east of Easton in its entirety, the Local Plan should acknowledge that the 'allocation', is now a committed site (i.e. with planning permission); and should be notated as such and included in the settlement boundary; and that the Local Plan Policy EAS 1 should be redrafted to only include requirements that are relevant to any future planning applications, not requirements that are addressed by the consent's conditions and/or associated Section 106 package. It should also specify the housing figure as a minimum or an 'at least' figure, in the event that opportunities arise for additional sustainable development within the allocation boundaries. The policy should not compromise this potential opportunity.

Conclusion

In conclusion, Persimmon Homes (Anglia) supports the Local Plan's acknowledgement that the site EAS 1: Land south and east of Easton is capable of accommodating additional homes beyond those identified in the previous Site Allocations Plan (900 units) and as permitted by the outline consent (890 units) and likely to be permitted (64 units). However, further clarity on how the housing target of 1,044 units has been derived and what it consists of and any related assumptions should be provided.

Importantly, Persimmon Homes (Anglia) do not consider it appropriate for the Policy to be simply rolled forward in its entirety without acknowledging that planning consent has been granted and that many of the Policy's requirements are met through the consenting process, as evidenced in the consent's planning conditions and the accompanying Section 106 agreement; and will be delivered through the implementation of the scheme.

Persimmon Homes (Anglia) also suggests that the Policy's housing figure should be expressed as a minimum or 'at least' figure, in the event that through the consenting of reserved matters application(s) making an efficient and best use of land, opportunities for further sustainable development within the allocation boundary presents themselves in the future.

Persimmon Homes (Anglia) remain very happy to continue to work with the Authorities to clarify those Policy EAS 1 requirements that remain relevant to any future planning applications, and those that are



not, particularly those that have been/are being dealt with by the original consent's conditions and s106 obligations package.

Should you require any further information, please do contact me.

Yours sincerely

John Long BA (hons) DipTP, MRTPI
Director
Encl. – completed Regulation 18 response form.

Greater Norwich Local Plan

Regulation 18 Draft Plan Consultation

Response Form

Thank you for responding to the Regulation 18 Draft Plan Consultation on the emerging Greater Norwich Local Plan.

The current consultation runs from. **29th January to 16th March 2020.**

It covers the **Strategy and Site Allocations**. We need to get views on these documents to help us draw up the version of the plan which will be submitted to the Planning Inspectorate.

When commenting on a policy or site, please include the site reference(s) in your comments.

If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email gnlp@norfolk.gov.uk

It is easier to respond online at www.gnlp.org.uk . If you cannot do this, please use this form to respond to the consultation on new, revised and small sites.

Consultation documents are available from www.gnlp.org.uk. There are also supporting documents which provide information on our policies and sites which may help you to make your comments.

Hard copies of the documents are available at consultation “Deposit Points” at:

- County Hall, Martineau Lane, Norwich (main reception);
- City Hall, St Peters Street, Norwich (2nd floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

Submitting your Response Form

Responses should be submitted by email to gnlp@norfolk.gov.uk or completed hard copy forms should be sent to:

*Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX*

**All submissions should be made no later than 5pm on
Monday 16th March 2020.**

1a. Contact Details	
Title	Mr
First Name	John
Last Name	Long
Job Title (where relevant)	Planning Consultant
Organisation (where relevant)	John Long Planning Ltd
Address	45 The Street Surlingham Norfolk
Post Code	NR14 7AJ
Telephone Number	01508 538218
Email Address	John@johnlongplanning.co.uk

1b. I am...	
Owner of the site <input type="checkbox"/>	Parish/Town Council <input type="checkbox"/>
Developer <input type="checkbox"/>	Community Group <input type="checkbox"/>
Land Agent <input type="checkbox"/>	Local Resident <input type="checkbox"/>
Planning Consultant <input checked="" type="checkbox"/>	Registered Social Landlord <input type="checkbox"/>
Other (please specify):	

1c. Client/Landowner Details (if different from question 1a)

Title	Ms
First Name	Laura
Last Name	Towns
Job Title (where relevant)	Head of Land and Planning
Organisation (where relevant)	Persimmon Homes (Anglia)
Address	Attention: Laura Townes Persimmon Homes (Anglia) Persimmon House Bankside 100, Peachman Way Broadland Business Park Norwich Norfolk
Post Code	NR7 0WF
Telephone Number	01603 977132
Email Address	Laura.Townes@persimmonhomes.com

Please make your comments below. You can comment on more than one policy or site on this form. Please clearly state the reference number of the policy or site your comments refer to.

Policy or site reference	Comments
Policy EAS 1: Land South and East of Easton	I am instructed by Persimmon Homes (Anglia) to respond to the current Greater Norwich Local Plan (Regulation 18) consultation specifically in relation to Policy EAS 1: Land south and east of Easton. Persimmon Homes control the majority of the site (excluding an area of the allocation to the north of Dereham Road, which is promoted separately by Orbit Homes) and which has the benefit of outline planning permission

--	--

Please add additional sheets if necessary

Background

The original Easton outline application 2014/2611/O was consented on 1 November 2016. The original outline application site (excluding an area of land to the north of Dereham Road, which is being promoted by Orbit Homes for 64 homes) extends to approximately 45 hectares and the consent limits the total number of homes to 890 units.

The original outline application requires compliance with approved parameter plans, including for layout, land use and density and a Design Code. The Design Code for the site was approved on 16 December 2019. A reserved matters application for the first phase of the scheme is being prepared and will be submitted for approval shortly.

Persimmon Homes (Anglia) aim to be efficient in the use of land (as required by the NPPF) as it prepares its reserved matters applications and considers that there may be future opportunities to accommodate additional sustainable residential development above that which is currently specified in the emerging Local Plan policy (1,044 homes) and this potential opportunity should not be compromised by the Policy.

It is acknowledged that to secure any future additional ‘uplift’ in residential unit numbers a new consent would be required, which would need to take account of any new policies adopted since the outline consent was granted; including contributions to CIL and providing ‘on-site’ requirements such as open space, access, utilities infrastructure/capacity reinforcement etc. necessary to support the ‘uplift’.

It is also acknowledged that any application for an ‘uplift’ in unit numbers will need to be supported by technical information to demonstrate that the scheme can be accommodated within infrastructure limits, or mitigations can be put in place (i.e. utility reinforcements) and without having a residual significant environmental impact. An EIA Addendum may also need to be prepared, to consider the environmental impacts of the uplift, taking into account cumulative effects, including recent planning commitments not considered at the outline stage; new legislation and changes in baseline information

Response to GNLP Consultation – Policy EAS 1: Land South and East of Easton

Persimmon Homes (Anglia) supports the Greater Norwich Local Plan’s acknowledgement that the site EAS1 : Land south and east of Easton is capable of accommodating additional housing units beyond the previous allocation figure of 900 units. This is evidenced by the fact that a scheme of 890 units has been permitted and a further scheme for 64 units is pending. However, it is not altogether clear how the figure of 1,044 homes has been derived and what it is comprised of or what assumptions have been made.

Persimmon Homes (Anglia) notes that the Policy EAS 1 is partially updated to reflect additional housing numbers permitted through the determination of the outline planning application (ref:2014/2611/O) and it is assumed likely to be permitted through the determination of the Orbit Homes planning application but these two figures do not equate to the Policy's suggested housing figure.

Also, Persimmon Homes (Anglia) note that the rest of the policy's 'requirements' remain unchanged from the previous policy and appear to ignore the fact that planning permission has been granted (in the case of the Orbit scheme is likely to be likely granted), with conditions and a section 106 obligations package which renders many of the policy 'requirements' superfluous or obsolete, as they are already addressed.

Persimmon Homes (Anglia) considers that the Policy should be redrafted to reflect the fact that planning consent has been granted; and that many of the policy requirements have been met through the determination of the planning application and are no longer relevant to any potential future application(s). It is accepted that there may be reticence to do this until the scheme has been lawfully commenced, but Persimmon Homes (Anglia) are confident that this will be done prior to the adoption of the Local Plan.

However, notwithstanding the above, the Local Plan should also acknowledge that the site may be capable of accommodating more than the suggested 1,044 units in the Policy. Persimmon Homes (Anglia)'s experience at Hethersett and other strategic sites is that the need to make the best and most efficient use of land often results in the housing numbers controlled by outline consents being met by using less land than anticipated by the outline consent, resulting in land being available within the red line of consented sites, which could reasonably accommodate further sustainable development. Persimmon Homes (Anglia) suggests that the emerging Local Plan should not rule this opportunity out in Easton and therefore suggests that the Policy's housing figure could be specified as minimum or an 'at least' figure.

Suggested changes

Persimmon Homes (Anglia) suggests that rather than simply roll forward the previous Local Plan allocation and Policy EAS 1: Land south and east of Easton in its entirety, the Local Plan should acknowledge that the 'allocation', is now a committed site (i.e. with planning permission); and should be notated as such and included in the settlement boundary; and that the Local Plan Policy EAS 1 should be redrafted to only include requirements that are relevant to any future planning applications, not requirements that are addressed by the consent's conditions and/or associated Section 106 package. It should also specify the housing figure as a minimum or an 'at least' figure, in the event that opportunities arise for additional sustainable development within the allocation boundaries. The policy should not compromise this potential opportunity.

Conclusion

In conclusion, Persimmon Homes (Anglia) supports the Local Plan's acknowledgement that the site EAS 1: Land south and east of Easton is capable of accommodating additional homes beyond those identified in the previous Site Allocations Plan (900 units) and as permitted by the outline consent (890 units) and likely to be permitted (64 units). However, further clarity on how the housing target of 1,044 units has been derived and what it consists of and any related assumptions should be provided.

Importantly, Persimmon Homes (Anglia) do not consider it appropriate for the Policy to be simply rolled forward in its entirety without acknowledging that planning consent has been granted and that many of the Policy's requirements are met through the consenting process, as evidenced in the consent's planning conditions and the accompanying Section 106 agreement; and will be delivered through the implementation of the scheme.

Persimmon Homes (Anglia) also suggests that the Policy's housing figure should be expressed as a minimum or 'at least' figure, in the event that through the consenting of reserved matters application(s) making an efficient and best use of land, opportunities for further sustainable development within the allocation boundary presents themselves in the future.

Persimmon Homes (Anglia) remain very happy to continue to work with the Authorities to clarify those Policy EAS 1 requirements that remain relevant to any future planning applications, and those that are not, particularly those that have been/are being dealt with by the original consent's conditions and s106 obligations package.

Disclaimer

Data Protection and Freedom of Information

The Data Controller of this information under the General Data Protection Regulation (GDPR)2018/Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

Once comments have been checked and verified they will be available online (with respondents' names) for others to see. Any representations which are deemed to contain offensive comments will be removed from the consultation site. Whilst we will include names on our website, we will remove personal contact details such as addresses, telephone numbers, emails and signatures before publishing.

If you wish to comment but feel that you have a strong reason for your identity to be withheld from publication, you can contact your District Councillor who will put forward your comments as appropriate. Please note that where you submit your views in writing to your local District Councillor, this is described as "lobbying" and the local member will be obliged to pass these on. The local District Councillor will be required to provide your details to the GNLP where they will be stored for their records.

Please note, however, that if you subsequently wish to comment as part of the formal Regulation 19 stage of the Greater Norwich Local Plan (due to take place in 2020) comments must be attributable for the public examination by the Planning Inspectorate.

See our Privacy notice here <http://www.greaternorwichlocalplan.org.uk/> for information on how we manage your personal information.

Declaration

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name

John Long

Date

12 March 2020

Greater Norwich –Regulation 18 Draft Local Plan Response Form

FOR OFFICIAL USE ONLY

Response Number:

Date Received:

Your completed form should be returned to the Greater Norwich Local Plan team **no later than 5pm on Monday 16 March 2020.**

If you have any further questions about the ways to comment, or if you need consultation documentation in large print, audio, Braille, an alternative format or a different language, you can email us at gnlp@norfolk.gov.uk or phone us on 01603 306603.