

## **GREATER NORWICH LOCAL PLAN DOCUMENTS:**

- **DRAFT STRATEGY DOCUMENT**
- **DRAFT SITES DOCUMENT**

## **REGULATION 18 CONSULTATION JANUARY 2020**

**ON BEHALF OF MR PETER RUDD**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)**  
**PLANNING AND COMPULSORY PURCHASE ACT 2004**

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## **1.0 INTRODUCTION**

- 1.1 These representations are made on behalf of Mr Peter Rudd who is the owner of a site in Diss identified as GNLP0250, which forms part of a preferred allocation in the Sites Document.
- 1.2 Mr Rudd is in active dialogue with the adjoining parties for sites GNLP 0342 and 0291 that form part of this preferred allocation (policy GNLP0250/0342/0119/0291) regarding the delivery of this site for development within the first 5 years of the plan period. Further information regarding this will be supplied as discussions progress and work is completed ahead of the Regulation 19 stage of the GNLP.
- 1.3 The representations made in this report relate to both the draft Strategy Document and the draft Sites Document and are made in the context of Mr Rudd's interests in Diss.

## **2.0 STRATEGY DOCUMENT**

### **Policy 1: The Sustainable Growth Strategy**

**Question 13. Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?**

**Question 14. Do you support, object or wish to comment on the approach for housing numbers and delivery?**

- 2.1 Agree in relation to Diss - Our client, Peter Rudd, has an interest in a site at Diss that is proposed for allocation (policy GNLP0250/0342/0119/0291). Diss is identified as a main town, which falls within the second tier of the settlement hierarchy. We agree with this ranking for Diss and the proposed distribution of housing to that settlement, which we note is expressed as a minimum.
- 2.2 Object - We do raise concerns about the reservation of the sites to be allocated for housing in the South Norfolk villages as part of a separate plan-making exercise (South Norfolk Village Clusters Housing Site Allocations document). We consider that it is more appropriate for this to be considered as part of this plan-making exercise so that any issues with the delivery of housing to meet the needs identified can be rectified by an alternative distribution across the

hierarchy. The unknown outcome of that exercise could have significant implications for the distribution of housing across the settlements.

## **Policy 2: Sustainable Communities**

### **Question 19. Do you support, object or have any comments relating to the specific requirements of the policy?**

- 2.3 Object - There is an absence of any evidence to suggest that the 20% reduction against Part L of the 2013 Building Regulations (amended 2016) is achievable in the short to medium term. We therefore object to the current wording of this requirement and suggest that a more flexible approach be taken to this policy requirement with the wording 'All new development will seek to provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016).'
- 2.4 It is important that the wording of Policy 2 explicitly allows matters such as viability to be taken into account when considering the merits of particular development sites. Whilst the Council estimates that the measures to deliver a 20% reduction would cost between £2,000 and £7,000 per dwelling (which is a significant range of cost impact in itself), this additional cost could impact negatively on the delivery of sites whether other costs such as infrastructure, ground contamination, etc. were already impacting on viability. Moreover, the 'alternative approaches' text suggests that anything more than a 20% reduction would be universally unviable. Given the other site-specific requirements that will also impact upon the delivery of individual sites having a requirement for a 20% reduction that is so close to rendering sites unviable is not a sound approach to securing the delivery of new homes. Therefore, as worded the Policy requirement for a 20% reduction against Part L of the 2013 Building Regulations (amended 2016) could prevent sites coming forward.

## **Policy 4 – Strategic Infrastructure**

### **Question 25. Do you support, object or have any comments relating to the approach to on-site and local infrastructure, services and facilities?**

- 2.5 Object - The policy requires ' Development proposals will provide on-site services and facilities and support local infrastructure capacity improvements through on-site provision, providing land and developer contributions.'. We

are concerned that the wording of this requirement does not adequately reflect the ability that individual developers have in respect of infrastructure delivery. For example, a developer can provide the land and funding for a school within a particular site but has no ability to actually deliver a school service. Furthermore, the support to local capacity improvements currently suggests that all of the measures listed are necessary, which may not be appropriate in all cases. It is suggested that the wording is amended to reflect this, and a suggested amendment is provided below.

"Development proposals will **be expected to mitigate the impacts of the scheme proposed on local infrastructure through either the provision of** ~~provide~~ on-site services and facilities **(where appropriate and necessary) and/or by** ~~and~~ **supporting** local infrastructure capacity improvements. ~~through on-site provision, providing land and developer contributions."~~

## **Policy 5 – Homes**

### **Question 27. Do you support, object or have any comments relating to approach to affordable homes?**

- 2.6 Object - Policy 5 requires 'at least' 33% affordable housing across the plan area and 'at least' 28% in Norwich City Centre. However, the evidence base for this (SHMA) suggests a lower figure, which it identifies as 28% of the identified housing requirement at that time. As that housing requirement has increased, it follows that the proportion of affordable housing needed across the Greater Norwich will be less than 28%. In the absence of any updated assessment, there seems to be a serious lack of evidence to justify a higher figure across the wider plan area, which raises significant concerns about the appropriateness of the strategy of not considering alternatives to this policy requirement. To rectify this, the affordable housing requirement should be reduced to reflect the available evidence.
- 2.7 Finally, the inclusion of the words 'at least' before the percentage requirement of affordable housing should be omitted as it raises expectations that this is the minimum figure that will be delivered on sites. Where there are site specific reasons for delivery of a lower percentage of affordable housing planning officers would have less flexibility to make a planning judgement taking into

other material considerations if there is no amendment to the wording of Policy 5.

**Question 32. Do you support, object or have any comments relating to the approach to Self/Custom-Build?**

- 2.8 Object – the policy imposes a blanket requirement of at least 5% self/custom build plots on residential proposals of 40 dwellings or more. Such an approach does not appear to be supported by any evidence to demonstrate that there is a need for such a scale of provision and does not allow for the specifics of an individual site to be considered (e.g. is it a suitable site, does it impact on viability?). It is wrong to assume that those in search of self/custom build plots wish to be located within a wider site for housing.
- 2.9 Furthermore, the policy allows for the requirement to be avoided if the developer can prove that there is not a need for it. That is entirely the wrong way round – the policy requirement must be justified in the first place and the relevant Local Planning Authorities are responsible for holding a register of those searching for such plots. Such registers need to be regularly updated and cross referenced with neighbouring registers to eliminate double counting. This is not the responsibility of an individual developer and so it is wrong to identify this as a reason to overcome the policy requirement.
- 2.10 We suggest that the policy be amended to encourage the provision of such plots rather than require them and cross-refer to a policy intention to monitor the supply of such plots against demand with associated future policy amendments should this be required. Instead, we consider that the delivery of self/custom build plots would be more appropriate as a requirement for windfall sites under policy 7.5.

**Policy 7.4 Village clusters**

**Question 45. Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.**

- 2.11 Our client is concerned that 1,200 homes are proposed to be delivered on as yet unidentified sites that are to be allocated through a separate South Norfolk Village Clusters Housing Site Allocations document. This is a document that

has yet to have an agreed timescale for production and does not feature in the current LDS. The reliance on another plan process to deliver these homes has adds uncertainty and delay to the delivery of these new homes.

- 2.12 The strategy for delivery these 1,200 new homes across the villages is yet to be identified and therefore it is unclear whether they will be delivered in sustainable locations or in the form of development that could fund sufficient infrastructure or deliver appropriate levels of affordable housing.
- 2.13 This reliance on a further plan process departs from the single plan strategy that the GNLP seeks to deliver with inherent adverse consequences for sustainable development. This is not an appropriate strategy for the plan and therefore the alternative strategy of including this requirement as part of the single plan process is more appropriate. This would allow for this provision to be considered as part of increasing the development yield of sites that are coming forward as part of the GNLP process.

## **Policy 7.2: The Main Towns**

**Question 41. Do you support or object or wish to comment on the approach for the main towns overall? Please identify particular issues.**

**Question 42. Do you support or object or wish to comment on the approach for specific towns (Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham)? Please identify particular issues.**

- 2.14 Comment/object - We note that the housing figures identified for the main town are expressed as 'around' and that the individual towns have fixed figures. This is despite the overall housing requirement of the Plan being identified as a minimum figure. We therefore recommend that the word 'minimum' be carried through into the policy wording for the main towns, including the individual targets for each town.
- 2.15 Our client has a proposed allocation site in Diss (policy GNLP0250/0342/0119/0291) and supports the identification of a housing requirement in Diss but believes that the Plan should allow for greater numbers than has been identified to ensure that the most efficient use of allocated land

can be achieved and to allow for additional housing to come forward in locations that are already identified as being sustainable and have access to supporting facilities.

#### **Policy 7.4 Village clusters**

**Question 45. Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.**

- 2.16 Object – This policy proposes a minimum of 1,200 homes from the overall housing requirement being delivered through as yet unidentified sites that are to be allocated through a separate South Norfolk Village Clusters Housing Site Allocations document. This is a document that has yet to have an agreed timescale for production and does not feature in the current LDS. The reliance on another plan process to deliver these homes has adds uncertainty and delay to the delivery of these new homes.
- 2.17 The strategy for delivery these 1,200 new homes (minimum) across the villages is yet to be identified and therefore it is unclear whether they will be delivered in sustainable locations or in the form of development that could fund sufficient infrastructure or deliver appropriate levels of affordable housing.
- 2.18 This reliance on a further plan process departs from the single plan strategy that the GNLP seeks to deliver with inherent adverse consequences for sustainable development. This is not an appropriate strategy for the plan and therefore the alternative strategy of including this requirement as part of the single plan process is more appropriate. This would allow for this provision to be considered as part of increasing the development yield of sites that are coming forward as part of the GNLP process.

### **3.0 SITES DOCUMENT**

- 3.1 As identified earlier, our client owns the site identified as GNLP0250, which forms part of the preferred allocation identified as policy GNLP0250/0342/0119/0291. Our client supports this allocation and has the following comments to make:

1. Our client supports the identification of this site for 'at least' 200 homes and



is pleased to see this identified as a minimum requirement. Subsequent design work – informed by a masterplan – will confirm the maximum yield across this allocation.

2. The requirement for 33% affordable housing is not supported by appropriate evidence – for further information, please refer to the response provided to question 27 of the Strategy Document.
3. Our client supports the provision of a masterplan across all of the sites within this allocation to ensure an appropriate form of development is delivered. The masterplan process should be a prerequisite for any planning application that comes forward on any part of the allocation site.
4. The provision of a road through the allocation that links Shelfanger Road with Heywood Road continues to be supported by our client, who will work with the adjoining landowners/developers to deliver such a link.
5. The provision of land to extend the cemetery is not objected to but it is important that this policy requirement is supported by evidence to justify the scale of the requirement. Our client is happy to work with the adjoining landowners to confirm the appropriate location of that extension and notes the potential for this to be delivered on more than one site within the allocation. Our client would support the exact location of this provision to be clarified through the masterplan process.
6. Our client supports the intention to protect and enhance existing trees and hedgerows around the site but considers that the policy should reflect that the extent of protection will be determined by the masterplan process rather than a blanket protection as is currently worded. The current wording – taken to extreme – would prevent the delivery of road and pedestrian links through the various parcels within the allocation, which is clearly not the intention of this policy.
7. Our client supports the intention to protect existing Public Rights of Way and provide linkages into these. However, the wording of the policy should allow for the route of the PROW to be determined through the masterplan process so that variations of the existing route can be justified through sound urban design considerations. It should instead refer to the need to maintain a Public Right of Way either along the existing route or close by to reflect the

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outcome of the masterplan process for this site. This would include the provision of new linkages to this route to ensure appropriate pedestrian permeability through the site.

- 3.2 Our client is aware that the promoters for the adjoining site have undertaken detailed assessment of highway, arboricultural, ecology, landscape & visual impact and drainage considerations across the entire allocation and understand that this will be included in their representations. Our client understands that this work has not revealed any overriding constraints to the delivery of the application.
- 3.3 Our client is continuing in active discussions with the promoters of the adjoining parcels of this allocation in order to provide further evidence of deliverability of this site. This includes an intention to progress the masterplan discussions as part of the pre-application process. This will be provided during the plan-making process and ahead of the Regulation 19 version of the GNLP. Our client is committed to working constructively with the GNLP team to assist in this regard.