

Strategy Document of the GNLP
(Regulation 18(C) – January 2020)
Orbit Homes and Bowbridge Strategic Land
representations, prepared by David Lock Associates



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1.0 EXECUTIVE SUMMARY

- 1.1 These representations are submitted by David Lock Associates (DLA) on behalf of Orbit Homes who are who are leading the promotion of a strategic scale new settlement within South Norfolk, Silfield Garden Village (SGV).
- 1.2 The Greater Norwich area has significant economic and wider growth potential and is fast gaining recognition as a key destination and economic hub within the Cambridge-Norwich Tech Corridor, with connections to two other nationally significant growth corridors - London Stansted Cambridge corridor and the Oxford - Cambridge Arc. The world class research and innovation hub at Norwich Research Park signifies the prominence of Norwich and the wider tech corridor to compete on a global scale.
- 1.3 It is imperative that the growth and economic potential of this area is harnessed and can flourish, **securing Greater Norwich’s position on the national economic platform. This requires** an optimistic and proactive approach to growth. It requires confidence in and bold decisions on locating housing and jobs growth. Importantly, it requires alignment between objectives and ambitions and the policies that will deliver the growth. A failure to support the right growth in the right places will result in missed opportunities and a failure to deliver on the area’s economic objectives.
- 1.4 Of utmost importance is maximising and realising the potential of the Cambridge-Norwich Tech Corridor. This is a key objective of the Greater Norwich Local Plan (GNLP) and can only be achieved if infrastructure, homes and jobs are planned and delivered in tandem. Strong foundations for realising growth in the Tech Corridor already exist - the recently dualled A11 and planned rail improvements mean that, unlike many of the other nationally-significant growth corridors, the necessary transport infrastructure is already programmed or in place to accommodate new growth.
- 1.5 Over recent years much growth has been focused around North East Norwich. To reaffirm **Norwich’s connections to Cambridge and the Tech Corridor, it is now** considered vital that growth is rebalanced to the west where recent investment in highway infrastructure and direct and efficient connections on the strategic rail and road network can be maximised.
- 1.6 Given this context, we consider that the role and growth potential of Wymondham (the largest settlement outside of the Norwich Urban Area within the Tech Corridor, and with direct road and rail links already in place) is significantly underplayed, to the significant detriment of the Plan’s strategic objectives.
- 1.7 SGV is ideally placed at the heart of the Tech Corridor to deliver housing and jobs growth. The 451-hectare site is positioned less than 1 miles to the south of Wymondham, immediately adjacent to and capable of direct access from the A11. Within less than half a mile of Wymondham railway station, the site is under the single ownership of J.Alston and Son, a local landowner with a stated intention to deliver a high quality NetZero development. The promotion of the site is being undertaken by a highly experienced development team led by Orbit Homes together with Bowbridge Strategic Land who, in contrast to the standard land promoter model, will build a significant proportion of the homes at this site themselves as well as having the capability to deliver the necessary upfront investment in infrastructure.
- 1.8 We contend that no other site within the GNLP area has the same locational advantage, landowner / promoter / developer partnership model or the components of a successful sustainable scheme to achieve the objectives of the Local Plan.
- 1.9 The GNLP must take a long-term view in planning for growth, particularly on such an important growth corridor. As part of this plan, we contend that it must accommodate a strategic scale new

settlement to secure its wider Policy objectives including delivery of sustainable communities, many of which cannot be delivered by smaller scale schemes which do not have the critical mass to provide significant infrastructure investment.

- 1.10 The potential for a new settlement as an appropriate vehicle for meeting housing need is identified in the GNLP. However, the rationale for not including an allocation at the current time appears to be predicated on the large proportion of strategic scale commitments/existing allocated sites of 1000+ homes yet to be delivered, and the contention that a new settlement will take a long time to establish.
- 1.11 We contend that continuing with a spatial strategy based on existing strategic commitments around Norwich and to the north east of the city is flawed. There is a need to re-balance strategic growth in the GNLP area to avoid market saturation and ensure a diverse offer to the housing market. The long-term nature of new settlements is precisely the reason that they should be identified and allocated at the earliest opportunity to provide certainty and ensure they are comprehensively planned in the context of strategic infrastructure decisions and investment. A **'piecemeal' approach** to distributing medium scale development sites around the edge of numerous settlements – a process we have termed **'edge-blobbing'** – means that wider infrastructure opportunities and requirements are never comprehensively considered and cannot be delivered without additional local authority finance.
- 1.12 We support the overarching objectives and vision for the Plan. However, there is an inherent risk with the GNLP as currently drafted that the policy position does not align with these objectives and simply will not deliver the stated ambitions and aspirations of the Greater Norwich Area. Furthermore, the GNLP must have regard to and align with other strategies and initiatives, including investment through *Transforming Cities* and *City Deal* and the *New Anglia LEP Strategic Economic Plan*, all of which recognise the importance of Tech Corridor and must translate these into a supportive policy framework.
- 1.13 We suggest that on this basis, a review of the spatial growth strategy to better align growth locations with areas that are identified for economic growth and investment, would put the Plan in much stronger position to progress to Examination. There are clearly allocations within this Plan that are not considered to be the most sustainable or deliverable sites when properly considered against reasonable alternatives. These potentially include circa 1,400 homes at Sprowston; 1,400 homes at Tavernham; 1,200 homes at Carrow Works and 1,200 homes attributed to the South Norfolk Village Clusters Document. This is critical as it indicates that up to 69% (5,200 homes) of the new allocations are potentially part of a seriously flawed spatial strategy and need to be reconsidered and potentially re-distributed.
- 1.14 Furthermore, it is clear from looking at the recent economic and housing growth potential of the Greater Norwich area, especially in the context of the Tech Corridor objectives, the GNLP does not include sufficient housing to meet growth requirements and support the success of the area. The housing need accommodated within the Plan needs a serious review and adjustment if it is to align with wider economic growth objectives.
- 1.15 We contend that the most sustainable way to accommodate additional housing numbers and re-distributed numbers is in the form of a new settlement. In comparison to its other new settlement competitors, SGV is located within one of the most dynamic and productive economic areas of the UK; the **Cambridge-Norwich Tech Corridor**. SGV is **'plugged in'** to the wider Tech Corridor, its labour force and business supply chains by virtue of its accessibility and strategic location. It is uniquely positioned to take advantage of existing and planned investment in transport infrastructure and is the only site of this scale that has direct access to an excellent public transport network.

- 1.16 SGV is distinguished from its competitors by a concept that integrates a dedicated on-site source of renewable energy, generated through the proposed solar farm, alongside a Tech Hub centred around the new A11 junction. Available to businesses and residents, the renewable energy generated by the solar farm and the availability of employment space within the GV provides unique opportunities for socially and environmentally minded businesses looking to make the transition to net zero carbon, as well as businesses focused on developing and implementing clean energy and clean growth technology solutions to address the challenges of the 21st century.
- 1.17 A *Development Prospectus* for the Garden Village was submitted to the GNLP in September 2019 summarising the development potential of this site and its ability to deliver new homes at a strategic scale (included at Appendix 1).

Silfield Garden Village Proposals

Silfield Garden Village is proposed for a new community of: up to 6,500 high-quality affordable and market homes with a wide range of house types and tenures; a new Tech-Hub providing flexible employment uses centred around a new A11 junction which will create a range of opportunities focused in the key local sectors including energy and agri-tech; comprehensive community facilities including a new secondary school and primary schools and other local amenities; an excellent pedestrian and cycle network providing direct connections to Wymondham railway station and town centre and new public transport with links to Wymondham and further afield to Norwich and other key centres; all embedded within a network of strategic green infrastructure that will protect and respond to the local landscape setting.

The new community will be designed to achieve NetZero standards from the outset and as such the Garden Village will be delivered in tandem with a solar farm and significant carbon code compliant woodland planting for offsetting. This will contribute to securing a wider strategic green infrastructure network that also provides an attractive landscape buffer to the proposed development.

2.0 SITE INTRODUCTION

- 2.1 The SGV site comprises circa 451 hectares of land to the north and south of the A11, south of Wymondham. A site location plan is included at Appendix 2.
- 2.2 Constituent parts of the site have previously been submitted for strategic scale development in response to the earlier Regulation 18 consultations. These include:
- Land at Park Farm (GNLP reference 2168)
 - Land at South Wymondham (GNLP reference 0515)
 - Land to the north-east of Silfield Road, Silfield, Wymondham (GNLP reference 0402)
 - Land to the south-west of Silfield Road, Silfield, Wymondham (GNLP reference 0403)
- 2.3 The proposition for a Garden Village on the newly-combined site reflects a desire to promote a holistic and coordinated approach to growth in this location and follows previous liaison with the Greater Norwich Development Partnership (GNDP) regarding this opportunity. A *Development Prospectus* for the Garden Village was submitted to the GNDP in September 2019 summarising the development potential of this site and its ability to deliver new homes at a strategic scale (included at Appendix 2).
- 2.4 The GNLP recognises that a new settlement in this location has potential as a way of meeting future housing needs **as the site is identified as a 'reasonable alternative'**. These representations reflect this recognition and reaffirm that SGV provides an excellent opportunity as a strategic location for growth, but that it should be allocated within the current GNLP rather than postponed for a future round of plan making.
- 2.5 Pursuing a comprehensive approach to growth is considered to represent the most sustainable option for Wymondham which will deliver numerous infrastructure and community benefits as well as providing **long-term certainty for Wymondham's** future planned growth. As such, these representations should be considered as superseding the previous separate promotions of the constituent sites listed in para 2.2 above.
- 2.6 This submission builds on the proposition for SGV set out in the September 2019 Development Prospectus and includes technical baseline information (Appendix 3) to evidence that the site is deliverable in terms of infrastructure and is not subject to constraints that would impede the capacity of the site.
- 2.7 The opportunity at SGV comprises a mixed-use development for up to 6,500 homes alongside a hi-tech, zero carbon employment hub with supporting facilities and green infrastructure. At this scale of planned growth, the provision of on-site primary and secondary schools, employment opportunities, local centres and community facilities is built into both the design and the viability of the scheme. Critically, development at this scale will unlock meaningful improvements to local transport infrastructure and support a new junction on the A11 and improved public transport connections.
- 2.8 The site is under single ownership by J. Alston and Sons, who have a long term in the land and its future. J. Alston has entered into an agreement with Orbit Homes, as the development arm of the Orbit Group, one of the largest Registered Providers in the UK, and are working with promoters Bowbridge Strategic Land. The team are taking a master developer **approach and 'patient capital'** model of delivery. Using the Orbit financial model, this means that investment in infrastructure can be unlocked early without relying on land disposals to volume housebuilders. This development model also means that delivery of housing units can be insulated against market fluctuations as Orbit will themselves deliver a significant proportion of market homes as well as the affordable homes on site. The model helps eliminate viability and the slow delivery risks that can otherwise be associated with large sites as it can support early on-site mobilisation.
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- 2.9 The suite of technical baseline evidence provided at Appendix 3 demonstrates that the site is not subject to any overriding physical constraints. Most notably:
- i. The SGV site is primarily Grade 3 agricultural land, comprising a number of arable fields, intersected by hedgerows and trees;
 - ii. The site includes an area of Ancient Woodland which has been positively incorporated into the design of the GV as a landscape and biodiversity asset to be retained and protected through sensitive design and restricted access;
 - iii. The Bays River runs within and adjacent to the site a further watercourse runs through the site. These are landscape assets that are retained and will be utilised as part of a sustainable surface water drainage network;
 - iv. The site is primarily in Flood Zone 1 and at low risk of flooding. Some minor parts of the site are within flood zones 2 and 3, however they would be clear of development. Some minor areas of surface water flooding also exist, but it is considered these can be mitigated as part of the drainage network;
 - v. No designated heritage assets are within the site, however buildings at Park Farm and Lower Park Farm which have no formal designation, can be retained as part of the development;
 - vi. A moated site at Lower Park Farm provides a valuable undesignated heritage asset and through sensitive refurbishment will provide a community destination at the heart of the Garden Village.
 - vii. A high pressure gas main is within the site, however this has been incorporated as a green corridor with the necessary offsets.

3.0 THE EMERGING PROPOSALS

3.1 The vision for Greater Norwich is encapsulated in paragraph 109 of the GNLP which states that it aims to “*support the growth of a diverse low carbon economy which will compete globally through its world class knowledge intensive jobs in the Cambridge Norwich Tech Corridor...*”.

3.2 SGV could be a key catalyst to both unlock and support growth and economic success in the Greater Norwich area. To meet its vision and objectives, the GNLP must harness and maximise the growth potential of the Cambridge – Norwich Tech Corridor. Fundamentally this requires an optimistic and ambitious policy direction to be adopted for the corridor, aligning infrastructure, jobs and housing growth. A new settlement at SGV is ideally positioned to be a central component of a growth strategy for the Corridor in the current plan and this section of our representations sets out the opportunity provided by this proposition.

A detailed overview of the opportunities generated by SGV is presented in our *Development Prospectus* (Appendix 1). Since the submission of the *Prospectus* to the GNDP in September 2019, further detailed work has been undertaken in respect of a technical evidence base to help refine the proposals. This is included at Appendix 3. This technical work has also further informed a high-level viability which will be provided to GNDP to demonstrate that the scheme is deliverable on the basis of the infrastructure it is intending to provide. The *Prospectus* also provides further detail on how the Orbit delivery model will ensure a strong and stable approach to delivery that cannot be achieved through sole reliance on volume housebuilders that seek to exert control over releasing units to the market. Importantly, this sets SGV apart from other existing committed and proposed strategic sites and safeguards it from the delivery problems that can be encountered on such sites.

3.3 The information below sets out the current position in respect of the proposals and the opportunity that they present, to further supplement the *Prospectus*.

New homes to meet local needs

3.4 The SGV scheme could deliver up to circa 6,500 new homes. The baseline technical assessment of the site has informed the preparation of an outline *Development Capacity [Plan]* and *Illustrative Master Plan* (ref: SIL001-021, Appendix 4). The scheme that is the subject of these representations reflects the known site factors identified in the technical assessment and has addressed the key physical and environmental considerations in its design and capacity analysis. This, therefore, means that the promoters are confident in the ability of the site to deliver this scale of development.

3.5 The site would deliver a new junction on the A11 – a requirement previously identified as part of the previous promotion of the land as necessary for any strategic scale growth south of Wymondham. Beyond this requirement to provide access to the development, the GV is not considered to have any significant infrastructure requirements that would inhibit early delivery. Having a single landowner, coupled with Orbit as development partner leading the process from the outset, means that on-site mobilisation can be facilitated in a timely manner. This means that, subject to progressing this site through the Local Plan and an outline planning application, the site can be opened up and homes could be delivered within an expedited period compared to other strategic sites reliant on multiple landowners and land sales to third party housebuilders.

3.6 In this context a delivery programme which suggests that first completions could be achieved in 2025 - and that SGV could deliver up to 3,700 homes in the Plan period – is not considered unreasonable. As noted above a significant proportion of the total number of homes would be delivered by Orbit (up to 50% of the total) to include market housing as well as all the affordable homes.

Building at the New Community Scale

- 3.7 Critical to achieving sustainable development and helping to tackling the climate change challenge is delivering the right scale of development to achieve appropriate levels of self-containment. The scale of SGV and the ability to plan strategically will facilitate the delivery of a range of community facilities and infrastructure improvements in and around the site. The critical mass provided by this scale of development will support new on-site facilities and services, including primary and secondary schools, local centres and green infrastructure: the Illustrative Master Plan (Appendix 4) includes provision for up to three new primary schools and a secondary school as well as a number of local centres to support the day to day needs of the new community and new strategic green infrastructure in and around the site.
- 3.8 This provision is integral to achieving high levels of self-containment and reducing the necessity to travel longer distances for day to day needs. A series of smaller developments, even at the scale of circa 1,000 units or so, would not achieve this degree of self-containment – it is simply not financially feasible to provide this level of facility on-site at a smaller scale, so by default would look to existing facilities in the local area to serve new homes, which risks putting undue pressure on these facilities even if appropriate s106 contributions are made to off-site provision.
- 3.9 It is important to note that, depending on the degree of self-containment considered appropriate by the LPA, SGV could also provide a catchment population to support higher order services and facilities in Wymondham, reinforcing the economic success of its town centre as a destination for heritage, town centre retail and leisure activities, for example. To enable any trips into Wymondham to prioritise active and sustainable travel, the scale of growth – and the design of routes and movement networks already built into the design of SGV – would enable improvements to be made to existing pedestrian, cycle and public transport infrastructure to and from Wymondham.

Economic Opportunities

- 3.10 As part of our technical assessment, considerable economic evidence has been gathered which reaffirms the opportunity that exists at SGV to meet the economic aims and objectives of the Cambridge-Norwich Tech Corridor initiative and to support and complement the world class research and innovation hub of Norwich Research Park.
- 3.11 We recognise that spatially, economic growth is being directed to locations within Norwich City and in and around Norwich Research Park. Other locations – such as Hethel and Snetterton – also form key features of the emerging strategic economic growth strategy focused on the Tech Corridor.
- 3.12 We support this objective for all the reasons that are set out by the LEP and other stakeholders. However, we consider that these locations can be further supported by other economic investment activity to complement the overall offer and perhaps provide some employment accommodation **which might be 'missing' or underprovided locally.**
- 3.13 SGV is uniquely positioned at the heart of the Tech Corridor with immediate access to the A11 and direct connections to Wymondham Railway Station. This generates unparalleled potential for creating a destination in the Greater Norwich area at SGV which can provide flexible employment space – the nature and extent of which would be shaped with the LPA – to complement and support existing economic hubs in this part of the growth corridor including Hethel and Norwich Research Park.
- 3.14 The Illustrative Master Plan provided in support of these representations includes an area of employment-led **development in a 'gateway' position within** the site with immediate access to the

new junction and the strategic highway network. This land could provide up to circa 15 hectares of employment land suitable for a range of employment floorspace, but which we envisage would respond positively to the demands of the 'priority sectors' of energy and agri-tech business identified in the Tech Corridor. Providing an element of employment use as part of the GV helps balance homes and jobs across the new community, assisting in the self-containment of SGV and delivering more sustainable patterns of development across the GNLP area.

Environment

- 3.15 The technical assessment determine that the Site is predominantly arable land which is primarily of low ecological value with no designated sites. An Ancient Woodland is present but the proposals respond to this feature with an appropriate offset. There are some localised habitat features of value including a number of ponds, semi-natural deciduous woodland and species rich hedgerows. There are therefore, no overriding designations on the Site.
- 3.16 An integral feature of the proposals is an extensive green infrastructure network that will promote the protection and enhancement of woodland and hedgerows, where possible, and will create a new significant area of parkland along the Bays River corridor. As part of achieving NetZero for SGV, comprehensive woodland planting to the south of the main garden village will create new strategic green infrastructure which will be permeated by new pedestrian and cycle routes.
- 3.17 The SGV proposals have been designed, as demonstrated by the Illustrative Master Plan, to integrate sensitively with the existing environment both from a landscape and ecology perspective.

Infrastructure

- 3.18 The ability to maximise existing and planned investment in infrastructure alongside its ability to provide new infrastructure underpins the suitability of SGV for accommodating strategic growth. Planning for growth should not focus on solely on the infrastructure that must be delivered to support such growth, but as a starting point, should consider where capacity exists and where investment is already being directed – such as in Wymondham. To further support this infrastructure SGV will deliver a new junction on the A11 which will serve to help alleviate existing local roads as well as provide access for the development. The GV will also support the delivery of new public transport including new and improved bus routes and a well-integrated system to ensure journeys on bus and rail are as direct and efficient as they can be. A Connectivity Framework Plan (ref SIL001-023) is included at Appendix which demonstrates how SGV can achieve and contribute towards improvements to an excellent sustainable movement including direct access to public transport connections and a comprehensive pedestrian and cycle network.

Financial certainty and availability of funding and investment

- 3.19 The advantage of having a single landowner for a strategic site cannot be underestimated in the context of financial certainty and delivery. It eliminates the risks associated with negotiating multiple land deals and option agreements, the challenges associated with land acquisition and equalisation, and greatly simplifies both the planning and s106 approval processes.
- 3.20 SGV would be a nationally significant site for Orbit and, as a Homes England Strategic Partner, in addition to internal capital, Orbit would have access to funding and resource support to facilitate early delivery of the GV. This would involve establishing an infrastructure delivery vehicle to facilitate upfront investment in infrastructure in advance of any future land parcel sales and to manage the cashflow of the project to balance the profiles between infrastructure costs and receipts from land and housing sales.

4.0 RESPONSE TO CONSULTATION

Consultation Questions for Section 1 - Introduction

1. *Please comment on or highlight any inaccuracies in the introduction*
2. *Is the overall purpose of this draft plan clear?*

4.1 We have fundamental concerns with the draft Plan as it stands. These derive from the Introductory sections of the Plan, and although our concerns do not relate to inaccuracies in terms of what the Plan is to achieve, we are concerned with how the Plan itself aligns with the stated position and its lack of alignment with the proposed policies. This in turn means that the purpose of the Plan is not clear.

4.2 Paragraph 2 indicates that the GNLP have taken a long-term view of development needs to ensure the development in the right place and at the right time. We contend that the GNLP has not taken a long-term view or sought to locate development in the right place at the right time. As is set out in further detail in response to Policy 1, the GNLP does not plan for sufficient housing to meet the local needs in accordance with the *National Planning Policy Framework (NPPF)* and *National Planning Policy Guidance (NPPG)*. It does not take a long-term view in terms of the growth of the Cambridge-Norwich Tech Corridor, and in policy terms, does little to encourage or stimulate the success of the Corridor. This stance is not aligned with wider strategies and initiatives, and therefore we consider the aim of the plan is undermined.

4.3 **The Plan is not considered to identify sites to meet Greater Norwich's growth needs from 2018 – 2038 sustainably.** The preferred sites identified are not the most sustainable when compared to reasonable alternatives and the Plan defers the allocation of sites for 1,200 homes to a future 'Village Clusters' Plan, which is discussed further in respect of Policy 1.

4.4 **The introductory section sets out the context of other strategies which 'provide the context for development in Greater Norwich'. We agree with all of the initiatives and strategies referenced but have grave concerns that this draft Plan does not align its growth strategy with them, as detailed further below:**

- Projects of national significance – improvements to A11 trunk road. This recently dualled and important link between Cambridge and Norwich has been subject to substantial investment. It is imperative that growth should maximise and support the investment that has already been made. In this context allocating growth at SGV, with a new junction on the A11 (funded by the development) would capitalise on these improvements, rather than rely on significant and potentially uncertain future road improvements.
- *Economic Growth* – as is set out in Appendix 3 (*Technical Review of Housing Need* prepared by Turley), we contend that the Plan does not make sufficient provision for housing to meet the economic growth requirements.
- Transport Priorities including *Transforming Cities* – the recent Transforming Cities funding bid includes allocation of funding for a mobility hub at Wymondham Station. The case for **investment should be supported through reaffirming Wymondham's position in the settlement hierarchy and its growth capabilities in this context.** In accordance with achieving sustainable development in line with the NPPF, the GNLP should align growth locations with sustainable transport improvements. There is not sufficient recognition for the growth potential of Wymondham, either in the context of the settlement hierarchy; its location within the Tech Corridor; and its sustainable transport connections (with planned investment). The GNLP should plan comprehensively for strategic growth at Wymondham in this context and not simply provide for smaller scale sites incrementally.

- The GNLP indicates at paragraph 22 that there is a need for the Plan to look beyond the current end date of 2038 by setting a strategy that can be sustainably added to in the long term. This approach is not reflected in the policies contained within the plan. There is, in fact, recognition that a new settlement may be needed in a review of the plan but that the reason one is not to be allocated now is due to the long period for such developments to establish (*Paragraph 168 of the GNLP Strategy Document*). This wholly contradicts paragraph 22. To plan ahead, the GNLP should be proactive in identifying and allocating a new settlement to allow strategic scale growth to progress with certainty, both for those responsible for its delivery and for the local communities affected.
- Paragraphs 24 - 26 indicates that a separate document is to be produced to allocate 'small sites' across South Norfolk. This significantly undermines the purpose of the Plan by not making clear how the Plan is treating its strategic policies in accordance with paragraphs 17 – 22 of the NPPF. These should make sufficient provision for housing (para 20) and should provide a clear strategy for bringing sufficient land forward to address objectively assessed needs over the plan period. We recognise that the NPPF allows for non-strategic policies to be covered in a separately where they set out more detailed policies for specific areas, neighbourhoods or types of development. However, the scale of growth attributed to the Village Clusters document (at 1,200 homes) is considered significant in the context of the relatively minimal new allocations made.
- Worryingly, it is also clear from the Interactive Mapping used by GNLP that it is not just small sites that have been deferred for assessment in this separate plan. Some medium to large scale sites across South Norfolk have also been deferred and therefore are not assessed as part of the GNLP. Given that this is a Joint Local Plan, the approach of preparing a separate document for just one constituent authority in isolation is not considered a robust approach to plan making and risks making the GNLP ineffective. We strongly consider that land for the 1,200 homes should be allocated within the current GNLP: this is the only way to ensure growth options are considered holistically, particularly in the context of infrastructure requirements.

Consultation Questions for Section 2 – Greater Norwich Spatial Profile

3. *Please comment on or highlight any inaccuracies within the spatial profile*
 4. *Are there any topics which have not been covered that you believe should have been?*
 5. *Is there anything you feel needs further explanation, clarification or reference?*
- 4.5 Our concerns with regard to the Spatial Profile are closely related to the introductory comments above and focus on the lack of alignment with the policy direction of the Plan. We make the following observations:
- Wymondham is the largest settlement outside of the Norwich Urban Area. Whilst it has been subject to a number of development site allocations/consents in recent years, the location of Wymondham and its services and amenities make it an ideal location for strategic growth. This is not realised in the Plan. Some minimal additional growth is allocated in two locations on the edge of the town, but it is not of a scale which can secure significant investment in infrastructure and thus will put pressure on existing services and facilities. Examining the potential for the reasonable alternative of a new settlement in this location – which would deliver a more sustainable pattern of growth than that currently proposed for allocation – is not considered in the plan.
 - There is need to re-balance growth in the Greater Norwich area which has focused on Norwich itself and the north east triangle in particular. This growth is not aligned with

the wider growth and economic strategies which underpin the plan. As the next largest settlement in the plan area, as well as being located in the Cambridge-Norwich Tech Corridor and with a close relationship to the world class facilities at Norwich Research Park, Wymondham should be identified as the priority location for accommodating strategic development.

- Paragraph 67 states that the A11 corridor is a major focus for growth. We do not consider this to be the case in the GNLP as no strategic sites with immediate/direct access to this route have been allocated. SGV is positioned squarely within the A11 corridor with direct access to it, and therefore it is not clear why this location has been overlooked for allocation to realise the **Plan's stated** growth objectives.
- In addition - and contrary to the statement that the A11 is a major focus for growth - the Plan highlights the growth opportunities arising from other priority road investment schemes. These improvements have not yet been undertaken, and some still need to secure approval and funding, yet growth is more closely associated with these '**uncertain**' future improvements than it is with the newly dualled A11. We cannot understand how this approach can be presented as robust or sustainable, given it fails to maximise infrastructure investments already completed.
- The context of the Transforming Cities funding bids is welcomed as the projects identified are important in promoting the modal shift away from the private car. However, as noted above such investments should inform and lead the approach to allocating growth to ensure that sustainable transport connections can be planned in from the outset and that the benefits of funding and investment can be maximised. This is the case for the Wymondham Mobility Hub which will **significantly improve Wymondham's public transport** offer and as such should influence and facilitate growth. If modal shift is to be achieved, particularly in new developments, it is essential that they are well positioned and have direct access to the improved public transport network, but also that they are of a scale which does not simply perpetuate current mobility patterns to access necessary services elsewhere.

Consultation Questions for Section 3 – the Vision and Objectives for Greater Norwich

6. *Do you support or object to the vision and objectives for Greater Norwich?*
7. *Are there any factors which have not been covered that you believe should have been?*
8. *Is there anything that you feel needs further explanation, clarification or reference?*

4.6 We support and agree with the Vision insofar as it provides a sound basis for the Local Plan and focuses on the pertinent issues that are key to the success of the area. The Vision and Objectives, however, need to be effectively translated into policies and allocations within the Plan. There are a number of important areas where there is a risk of misalignment, as evidenced below:

- The first paragraph of the **Vision relates to a 'low-carbon' economy and** to competing globally through world class knowledge intensive jobs in the Cambridge-Norwich Tech Corridor. To realise this ambition and economic objective of the Plan requires policies that will encourage and support the success of the Corridor by ensure that it has the jobs, homes and infrastructure it needs to flourish. This is not evident in the current draft Plan allocations and policies.
- The GNDP rightly envision that there will be a variety of new homes that will cater for the needs of all and that most homes will be built in and around Norwich and in the Cambridge Norwich Tech Corridor. We do not consider that the allocations within the draft plan will

meet the needs of all, or be in the right place to do so in a sustainable way: the current draft plan results in 69% of the housing growth in the plan period coming from the Norwich Urban area. We do not dispute that the Urban Area should be a focus for growth but with almost 70% of the identified need relying on the urban area, the spatial strategy simply does not align with the Vision and Objectives and thus risks not meeting the requirements of those for whom the new housing is designed to satisfy. Whilst we acknowledge that Norwich itself is understood to be included within the Tech Corridor, it is clear that in spatial and policy terms Norwich Urban Area and the Corridor are considered as two separate growth areas. With so much growth focused at Norwich, it is unclear how the Plan meets its own objective of making provision for significant growth in in the Corridor.

Consultation Questions for Section 4 – the Delivery of Growth and addressing Climate Change

9. *Do you support, object or have any comments relating to the approach to Housing set out in the Delivery Statement?*
 10. *Do you support, object or have any comments relating to the approach to Economic Development set out in the Delivery Statement?*
 11. *Do you support, object or have any comments relating to the approach to infrastructure set out in the Delivery Statement?*
 12. *Do you support, object or have any comments relating to the Climate Change Statement?*
- 4.7 We support the Delivery Statement and consider it a proactive and positive approach to securing the growth required within Greater Norwich. As has been previously discussed above, however, we do not consider that the priorities contained therein are achievable as the policy basis for them is not evident within the plan. Crucially, we question how GNLP consider the Plan supports the Tech Corridor to become an increasingly important axis to other significant growth corridors?
- 4.8 Furthermore, the Delivery Statement suggests the plan only allocates sites with a reasonable prospect of delivery. Orbit has excellent local knowledge and experience of the market and do not consider that the annual delivery rates that would be derived from the total commitments and **allocations, for instance in the 'growth triangle' (approximately 670 homes per annum)** over 20 years is achievable in the context of what the market can deliver and support. We appreciate that there are already substantial commitments in this location but question the logic of a plan which seeks to allocate further homes and apply such annual delivery rates to an area which has previously experienced slower than anticipated delivery rates? The delivery model of Orbit, whereby Orbit themselves construct a significant proportion of the homes, would demonstrate resilience against the delivery risks of other strategic sites that are controlled by multiple volume housebuilders. **Orbit's availability of and access to finance also mean that delivery is not impeded** by significant upfront infrastructure costs.
- 4.9 The climate change statement is welcomed and supported. However, integral to achieving the measures set out is providing the right type of development in the right places. The scale of new settlements offer the potential to plan comprehensively to meet all components of sustainability which is simply not achievable through small to medium scale sites. We contend that the allocation of SGV would contribute significantly to achieving the measures in the climate change statement given its potential for a substantial modal shift to public transport and its commitment to creating a NetZero development from the outset. Most notably, attributing 15% of the housing requirements (1,200 homes) to villages just within the South Norfolk area will not lend itself to sustainable modes of travel or will help facilitate any significant investment in the delivery of renewable or low carbon energy generation. We assert that in order to better align with the **Council's climate change statement and provide** certainty for future growth across South Norfolk, as a minimum, this unallocated housing requirement should be met within SGV as part of a wider

GV allocation, and the Plan should be much more proactive in seeking out opportunities for development that will tackle the climate change challenge head on.

Consultation Questions for Policy 1 – the Sustainable Growth Strategy

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

Settlement Hierarchy

- 4.10 We support the proposed settlement hierarchy and it is logical for the Norwich Urban Area and the main towns to be the focus for growth. A clear vision and objectives for the Greater Norwich Area are articulated in the Plan and there is a significant opportunity over the Plan period for the area to flourish and attract significant growth and investment and become a nationally important destination in terms of fulfilling an economic and educational, as well as tourism role within the UK.
- 4.11 There is, however, considered to be a significant lack of clarity regarding the approach to distributing growth as there are multiple different locational criteria taken into account in addition to the settlement hierarchy. This causes confusion and means that it is difficult to determine whether the approach to distributing growth is robust. The priorities for locating growth, as suggested in GNLP, include:
- 'Growth broadly follows the settlement hierarchy';
 - 'Focusses most of the growth in locations with best access to jobs, services and existing and planned infrastructure in and around the Norwich Urban Area and the Cambridge Norwich Tech Corridor';
 - 'In the strategic growth area – which also includes the Cambridge Norwich Tech Corridor'.
- 4.12 It is not clear which of these take precedence and how they are intended to interrelate. As such, it is not appropriate to simply ask whether there is agreement with the distribution of housing within the hierarchy as this is not the only factor affecting the location of growth. This approach should be clarified.
- 4.13 It is also not clear, apart from the allocations in the Norwich Urban Area, how the growth and distribution strategy is reflective of any of the other reasonable alternatives considered in the *2018 Growth Options* consultation. Worryingly, apart from providing a brief rationale as to why alternative approaches have not been pursued in respect of Policy 1, there is no formal SA of alternative approaches to the distribution of homes and the level of housing growth. Despite reference to options being considered at previous Regulation 18 stages, this is not a robust approach and could put at risk the draft plan in respect of its locational strategy as it has not been subject to testing against alternatives. Flaws of the Sustainability Appraisal (SA) are covered in the separate SA representation.
- 4.14 Furthermore, the simplistic approach of relating growth distribution to the settlement hierarchy fails to have regard for alignment with other strategies, initiatives and investment in the area. The Plan makes these other important considerations very clear in its introductory chapters with particular reference to the transport network, recent and planned improvements, *Transport for Norwich*, the Norfolk County Council *Rail Prospectus*, East West Rail and the *Transforming Cities Programme*. In this context, the A11 corridor is clearly well placed to accommodate growth in light of recent improvements and its role as the spine of the Cambridge – Norwich Tech Corridor. Wymondham itself is a focus for investment under the *Transforming Cities Programme*; its railway station is positioned on the potential extension of East West Rail and it is a growing hub for public transport accessibility. This is not however, then reflected in the distribution of growth.

Alignment of Settlement Hierarchy with Spatial Strategy

- 4.15 There is reference at paragraph 153 to the strategic sites contributing to the Cambridge-Norwich Tech Corridor and there is clearly a commitment throughout the Plan to supporting the Corridor and focusing growth within it. There is, however, no specific attribution of growth to the Corridor as a spatial area. Thus, there is no tangible evidence within the Plan as to how it is being supported. We strongly suggest that GNLP take an area-based approach to distributing growth; this has been partially undertaken for the Norwich Urban Area but then fails to articulate the Corridor as a spatial area for allocating sites. We contend that if the growth within the Corridor (excluding that which is attributed to the Norwich Urban Area in any case) was to be separately identified, it would highlight that there is not in fact any significant policy support for strategic growth within the Corridor that is not delivering growth for the Norwich Urban Area.

The Role of Wymondham as second in the hierarchy

- 4.16 Furthermore, **we also raise concerns regarding Wymondham's role and status.** Wymondham is the largest settlement outside of the urban area and therefore placed second in the hierarchy. It is positioned at the heart of the Tech Corridor and is within the strategic growth area. The town is well served by local facilities, is situated within immediate access onto the A11 and benefits from a stopping station on the Norwich–Cambridge Rail Line. On this basis and in accordance with the distribution of growth principles set out above, Wymondham should be a key focus for strategic-scale development.
- 4.17 **Wymondham, however, receives the lowest quantum of growth of all the 'main towns' with only 100 new units allocated.** We assume that the rationale for this approach is in part due to the existing commitments which already exist on the edge of the town. However, this approach is not reflective of the locational criteria that supposedly inform the distribution of future growth and we suggest that as part of the plan-making process and reviewing reasonable alternatives for growth, the locational criteria for future growth should be applied notwithstanding existing commitments. Existing commitments, coupled with the locational criteria and advantages identified in the paragraph above, simply serve to reinforce that Wymondham is an excellent location for planned strategic growth.

Impact of Contingency Allocations

- 4.18 We note that Wymondham is proposed as the location for a contingency provision of 1,000 additional dwellings should delivery of housing in the GNLP area not meet local plan targets (p106). However, no site(s) are identified for this contingency nor any locational criteria which would govern the selection of preferred sites or locations for this contingency in or around the town.
- 4.19 This approach runs counter to both the objectives and the clarity of the plan, instead providing a laissez-faire policy framework which will invite any number of speculative applications for circa 1,000 units or more numerous smaller scale applications to be submitted for consideration. There are a number of significant risks in this approach, for the main part associated with piecemeal infrastructure contributions and unmeasurable impact on existing services and the transport network. At 1,000 units, a single scheme would not be of the scale necessary to deliver significant new infrastructure on site or in totality but would instead place additional pressure on current facilities. If multiple smaller schemes come forward to meet the contingency, these could only deliver modest localised highway improvements or financial contributions towards infrastructure.
- 4.20 In respect of achieving well planned growth and providing certainty around associated infrastructure delivery, a number of soundness issues can be raised with the current approach, related to:

- The uncertainty around planning for and being able to secure necessary infrastructure if Wymondham accommodates 1,000 units in one or more unknown location(s);
- The same uncertainty applies if 1,200 units are allocated in currently unknown or unidentified villages; and
- The failure to meet the requirement of assessing reasonable alternatives in terms of specially considering alternatives to a) the contingency approach and b) the specific allocation of 1,200 units to the Village Clusters Document.

4.21 We strongly recommend that the 1,000-unit contingency should be attributed to the allocation of a Garden Village at Silfield.

Impact of South Norfolk Village Clusters Document

4.22 It is also important to note that 1,200 homes are attributed to a future 'South Norfolk Village Clusters Document'. In real terms this accounts for circa 15% of all new allocations within the GNLP and as such, from a hierarchy and distribution perspective, cannot be considered a sound approach that collectively means the villages accommodate approximately the same level of growth as the new allocations in the main towns.

4.23 Furthermore, the ability of the villages to accommodate growth has not been assessed and is therefore unknown. To attribute such a high figure towards them, given their position on the hierarchy, is therefore a significantly flawed approach and one that is likely to be undermined at Examination. No reasonable alternative for allocating this level of growth elsewhere within South Norfolk or the wider GNLP area has been considered. This is a material error in the Sustainability Appraisal of the Plan and calls into question the soundness of plan making in this regard.

4.24 We strongly recommend that the 1,200 units as yet unidentified in a future Village Clusters Document should form part of the overall housing requirement to be met explicitly in the GNLP and such be attributed within the allocation of SGV.

Consideration of New Settlements

4.25 The supporting text to draft Policy 1 indicates that no new settlement is proposed at this time **"as a significant proportion of the allocated sites are strategic scale commitments of 1,000 homes plus and the establishment of any new settlement is likely to take a long time"** (Paragraph 168). This is a flawed assertion and has no grounding in the plan-led approach in terms of assessing reasonable alternatives and undertaking a sustainability appraisal of growth options. A similar statement is provided in the accompanying Site Assessment booklets.

4.26 The existence of strategic commitments or other concurrent allocations have no bearing on whether a new settlement provides a more, or the most, suitable and sustainable growth option for a Local Plan. The assessment of the new settlement growth options within the Sustainability Appraisal and Site Assessment Booklets is inherently flawed and requires substantial review. We cover this point in more detail in our representations on these documents.

4.27 The approach to assessment of alternatives undertaken by the GNLP - and the consequential decisions in arriving at the preferred policy option - raises serious and wide-ranging issues of soundness. Most importantly, the alternative option - accommodating growth at a new settlement rather than within the other growth typologies allocated (primarily urban extensions and village clusters) - has not been robustly or appropriately considered. We contend that if a robust assessment of all types of growth and distribution had been undertaken as the starting point of the GNLP, SGV would rate very highly against other reasonable alternatives given its locational

characteristics, sustainability and self-containment credentials and ability to provide new facilities and amenities and investment in infrastructure.

- 4.28 We consider that the inconsistencies and flawed approach to the spatial distribution of growth set out within the Plan lead to a significant question mark over a large number of the proposed allocations. We contend that the current approach to the allocation of sites for least 5,200 homes does not represent the most sustainable option when considered against other reasonable alternatives. Given this level of inconsistency, we consider that the current assessment hitherto undertaken will undermine the progress of the Regulation 19 Plan, and its progress to Examination. On this basis we strongly recommend the GNDP undertakes a comprehensive review of the methodology and its conclusions prior to moving any further towards the publication of a Reg 19 Plan.

Suggested Alternative – A Deliverable Spatial Strategy and Planning Positively for Comprehensive Long-Term Growth

A Deliverable Spatial Strategy

- 4.29 In terms of hierarchy considerations, whilst we do not disagree with the stated role of Norwich and it being the main focus for growth, we are concerned that at 69%, the proportion of growth attributed to the urban area places too much reliance on a single growth location within Greater Norwich. This undermines the rationale and purpose of preparing a joint Local Plan.
- 4.30 It is understood that delivery issues have been experienced in bringing forward development within the growth triangle at north east Norwich. This area has extensive existing growth commitments - the equivalent to a major new settlement in its own right - with a significant amount still to be built out. The focus on Norwich – whilst logical in principle as the tier one settlement - has resulted in additional growth being allocated in north east Norwich in the draft Plan. However, when considering the current delivery position and the opportunities which derive from a joint plan for a wider area, the soundness of an approach which imposes further reliance on this area in terms of future delivery rates, particularly in the context of market saturation, is questioned.
- 4.31 The NPPF paragraph 73 requires that strategic policies should include a trajectory indicating the expected rate of delivery over the plan period. No such trajectory has been included in any of the Reg 18 stages of the plan thus far and on this basis we consider that a spatial strategy and approach to allocations relying on such a significant amount of existing commitments in the absence of this information is unsound. There is no evidence to suggest such numbers are deliverable or achievable within the plan period.
- 4.32 Furthermore, the continued focus of new allocations in the growth triangle does not align with supporting the Tech Corridor as a spatial growth pole. Lying on the far side of Norwich, growth here does not lend itself to reinforcing important connections with Cambridge, nor to supporting more sustainable patterns of movement along the A11/rail corridor. Neither does it align in terms of providing homes to support the economic hubs and jobs growth within the Tech Corridor.
- 4.33 On this basis, we suggest that rather than allocating a further 1,400 new homes to the growth triangle, a more appropriate and robust approach would be to redistribute this growth to align closely with the spatial objectives of the Tech Corridor thereby supporting the economic growth and success of Greater Norwich as well as providing a much-needed re-balancing of the local housing offer and a wider choice of locations within which to deliver new homes. Silfield GV would be an appropriate and deliverable location to accommodate this growth.
- 4.34 Similarly, we would question the GNDP decision to include an allowance for new homes from Carrow Works as part of the approach to housing allocations. Whilst we wholly support the **redevelopment of brownfield land and the Councils' ambition to create a new urban quarter for**

Norwich – and its consequent allocation as a 'strategic regeneration area' – we question the soundness of relying on the provision for 1,200 new homes to be delivered on this site as part of the housing strategy.

- 4.35 Despite the stated uncertainty about its delivery (as expressed on pages 46 and 94), the 1,200-home allocation represents circa 15% of the total housing numbers allocated in the plan. There is no rationale given for including a site for which there is significant uncertainty, nor does this approach accord with the NPPF.
- 4.36 Thus, we suggest that rather than making an explicit allocation for this level of housing, the GNLP **treat the contribution to made from this site in the same way as a 'windfall' category**. This approach would not only accord with the **Plan's overall approach of 'building in flexibility to support higher than trend economic growth' (page 45)** but would be in line with the NPPF and **Government's objective to significantly boost the supply of housing** (NPPF paragraph 59). Should Carrow Works deliver a proportion of its capacity within the plan period, this will serve to further boost the supply in Norwich. This approach would reduce the risk of the Plan failing to deliver its full housing requirement and having to make increased contingency allocations during or soon after the process to adoption. Maintaining the inclusion of the current contribution from Carrow Road as a firm and deliverable allocation undermines the soundness of the Plan looking ahead to Regulation 19 and the Examination, and risks incurring delay and further uncertainty over future growth locations.
- 4.37 In terms of meeting the consequent shortfall of 1,200 homes, we suggest re-distributing this growth from the Norwich Urban Area to the Tech Corridor would go some way to meeting our wide-ranging concerns regarding the mismatch between Plan objectives and spatial growth allocations. Silfield GV would be an appropriate and deliverable location to accommodate this growth.

Planning Positively for Comprehensive Well-Planned Growth

- 4.38 We have set out above our reasoning for the requirement for GNLP to undertake a re-running of the assessment of alternatives to include new settlement scale growth from the outset. This would allow reconsideration of the overall spatial growth strategy, and importantly, would allow a full and proper assessment of the role that SGV can play as part of this strategy.
- 4.39 We have also set out above why the GNLP needs to plan comprehensively for the long-term growth of Wymondham rather than make small scale allocations in favour of future contingencies and/or village cluster sites.
- 4.40 Attributing the 1,000 contingency sites and the 1,200 units as yet unidentified through Village Cluster at SGV would provide certainty and accord with the Plan-led approach advocated by the NPPF. Whilst SGV has the capacity to deliver up to circa 6,500 new homes – and an allocation for the full extent of the GV should be made in this Plan - the re-allocation of the identified potential shortfall of 2,200 homes to the GV would be deliverable within the Plan period.
- 4.41 Wymondham, by virtue of its location and position in the hierarchy, will continue to be an appropriate focus for growth in perpetuity and across future plans. There is, therefore, a need to plan properly for its growth and ensure a comprehensive approach to its infrastructure requirements and the long-term future of the town. This should be taken forward through identifying the strategic growth potential of Wymondham, *irrespective of past development commitments*, but this time adopting a holistic view of **the town's future needs in terms of** education, employment opportunities and role as an economic destination in the Tech Corridor.

- 4.42 In this context, SGV would be well placed, as a strategic allocation for a garden village, to address these long-term **infrastructure considerations**. **It provides the ability to 're-balance' the growth of the town** and establish a more positive relationship with the A11, maximising the accessibility this provides for the town and not perceiving it as a barrier to growth. Reviewing the role of Wymondham and its growth potential in the context of allocating a garden village at Silfield, would align with other initiatives and funding such as the potential Transforming Cities investment and the Tech Corridor whilst removing the uncertainty over the location and impact of future growth – through both speculative or contingency sites – which is so damaging to local communities and runs counter to effective plan making.
- 4.43 We therefore strongly suggest that the GNDP review the current approaches taken towards the growth of Wymondham in favour of making an allocation at SGV to plan positively and with certainty the growth of Wymondham and ensure the town can secure necessary infrastructure provision to safeguard against pressure on services now and into the long-term.

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

- 4.44 The Greater Norwich area has real potential for growth and compete as a nationally significant economic area. Such growth and success requires a positive and proactive policy basis; growth must be encouraged and not stifled. The GNLP approach to identifying the housing need for the area does not take a proactive approach; moreover, it risks inhibiting the economic and jobs growth that has been agreed as part of the City Deal, and more importantly the recent growth trends that have been evident.
- 4.45 Even more worryingly, there has been a very recent indication that the Greater Norwich housing delivery across Greater Norwich has achieved targets for the first time. This is a positive sign, but the numbers proposed as part of the GNLP would actually result in a reduction of delivery. This is a serious concern at a time when a key Government priority is to significantly boost the supply of housing, and in the context of strong local delivery which would be inhibited by the GNLP numbers.
- 4.46 The GNDP are aiming to meet a need of 2,027 homes per annum, with some further allowances for supply. It appears that GNDP have arrived at such a level of need by simply applying the standard method, introduced for the purposes of establishing a minimum need through recent revisions to the National Planning Policy Framework (NPPF) and related Planning Practice Guidance (PPG).
- 4.47 It is understood that GNDP view the outcome of this formula as an appropriate representation of the full need for housing in Greater Norwich, albeit there is a concerning lack of evidence to substantiate their position in this regard. This lack of consideration conflicts with national policy and guidance, which emphasises that the standard method produces only a minimum starting point and makes clear that there should be an assessment of whether housing need will actually be higher than implied by its formula.
- 4.48 The NPPG requires consideration of a number of factors as part of determining housing need from the starting point of the standard method including any affordability adjustment and taking account of economic circumstances. The GNDP do not appear to make any adjustment from the baseline of the standard method.
- 4.49 In this context we are concerned that the standard method baseline alone would not provide sufficient need as outcome of the method is intrinsically linked to projections that have underestimated population growth to date in Greater Norwich, and particularly failed to anticipate a more pronounced – and increasingly vital – net inflow of people from other parts of

the UK. This calls into question whether the method is accurately capturing the housing needed by the population in this area, both now and in the future.

- 4.50 As noted above simply meeting the need implied by the method would also prompt a 16% reduction in the annual rate of housing delivery belatedly achieved over the past three years, when adopted housing targets were met for the first time. Such a reduction is unjustified at a time when the Government remains committed to significantly boosting housing supply and in light of the GNLP objectives to encourage growth and support the Tech Corridor.
- 4.51 Given the economic objectives and wider strategies and commitments to significant jobs growth in Greater Norwich, it is concerning also that with no adjustment for this, simply meeting the need implied by the method would likely grow the labour force and support in the order of 37,000 new jobs. Whilst this supposedly surpasses the target proposed in the Draft Plan (33,000), it falls short of the job growth that can be reasonably expected to result from an ongoing economic growth strategy, this is covered in more detail on the economy below.
- 4.52 The GNDP target is considered inadequate in this regard, given that it is derived from an unjustified and unduly simplistic manipulation of a scenario presented in an evidence base document which is now comparatively dated and pre-dates the revised NPPF. Equally, as a result of the datedness of the informing analysis, it is considered to fail to adequately reflect the strong economic context which Greater Norwich has demonstrated for a sustained period of time or the full impact of planned investment. In this context it is considered that planning for in the order of 40,000 jobs as a minimum over the plan period would be more reflective of the strong potential for truly enhanced growth in Greater Norwich. This clearly would not be supported where housing provision is restricted to the level implied by the standard method, and the associated ageing of the labour force also appears unlikely to support the desired shift towards higher value sectors.
- 4.53 Based on the above, we consider that GNDP must update their evidence base prior to the next stage of consultation on the emerging Local Plan, to comply with the NPPF and PPG. This should properly evaluate the level of job growth that is likely in Greater Norwich, taking recent successes – no doubt linked to the City Deal and other initiatives – into account while reconsidering the prospects for long-term growth beyond **“business as usual” in key locations and sectors**. A related assessment of housing needs should also be produced, to locally test the minimum need implied by any standard method in and ensure that the housing needed to support a growing economy can be planned for.
- 4.54 GNDP also appear to have misconstrued the supply-led buffer proposed as part of its housing requirement, claiming that it provides flexibility to accommodate the consequences of successful investment strategies. The Draft Plan states:
- “Our overall approach, including to windfalls and contingency, builds in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal” (Paragraph 163 of the GNLP Strategy Document)*
- 4.55 The NPPF and PPG are clear that it is a requirement of Local Plans that they are deliverable and sufficiently flexible to adapt to rapid change. **The plan’s soundness will be judged against these requirements.** The buffer is required to ensure an appropriate allowance for unforeseen circumstances or non-delivery of sites which might otherwise pass the ‘developable’ test. Whilst the Councils have recognised this general point, and the resultant need for an increased level of flexibility, this should not be seen to provide capacity to accommodate need pressures; it is intended to alleviate risks to supply. In this context, the PPG (PPG Reference ID: 2a-010-20190220) is explicit in recognising that where authorities should consider the appropriateness of a higher housing need figure:

"This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan)"

- 4.56 The Draft Plan later describes another supposed reason as to why the GNLP have not sought to explore the appropriateness of a higher housing need figure, stating with reference to a higher housing figure being considered under a section titled 'alternative approaches' that:

"This is not the preferred alternative as evidence of delivery rates over the medium and longer term suggests that higher targets are unlikely to be achievable or deliverable. Setting a higher target that can be achieved undermines the plan-led system [*it is assumed this should read cannot] (Page 54 of the GNLP Strategy Document)*

- 4.57 This is not considered to represent an appropriate or PPG-compliant justification for not attempting to explore the appropriateness of a higher housing need figure. It is of note that the **standard methodology recognises the realism of 'delivery' with regards to the capping of the adjustment from the baseline to 40%**. The PPG specifically acknowledges (Paragraph Reference ID: 2a-007-20190220):

"The standard method may identify a minimum local housing need figure that is significantly higher than the number of homes currently being planned for. The cap is applied to help ensure that the minimum local housing need figure calculated using the standard method is as deliverable as possible"

- 4.58 It is of note that the adjustments for Greater Norwich are notably smaller than 40% and that, as is considered above in our representations [Paragraph 4.50], recent rates of delivery have exceeded the current plan target. As such, there is no justification for suggesting that deliverability concerns represent a valid reason for dismissing the appropriateness of a higher figure.
- 4.59 As previously mentioned in the context of delivery concerns with some of the allocated sites, the absence of a trajectory of this stage at the process to evidence how the sites will contribute to the housing need over the plan period, is a serious issue. This trajectory is required by the NPPF and by not having it available for representors to review and assess alongside the allocations, there is no certainty as to whether the housing needs will actually be met through the identified spatial strategy.
- 4.60 Based on the above, it is considered that the Councils must update their evidence base prior to the next stage of consultation on the emerging Local Plan to comply with the NPPF and PPG. Our objection to the housing needs to be met through the GNLP is set out in greater detail in the '**Technical Review of Housing Needs in Greater Norwich**' Report by Turley, February 2020, included at Appendix 3.

15. Do you support, object or wish to comment on the approach for the economy?

- 4.61 We support the general approach to the growth of the economy and welcome the recognition of the Tech Corridor and its relationship to the globally significant axis between Cambridge and Oxford. We are however concerned that the Plan is not optimistic enough in making provision for economic growth, both in planning for sufficient jobs and planning for sufficient housing to support these jobs.
- 4.62 The Draft Plan targets the creation of at least 33,000 jobs over the plan period (2018-38) and **confirms that this 'has been established through local trend-based evidence'** (Paragraph 149 of the GNLP Strategy Document). Whilst the Draft Plan attributes this to the East of England Forecast Model (EEFM) it also confirms its origination from evidence included in the *Employment, Town Centre and Retail Study* produced by consultancy GVA in 2017. This study used the then-latest

published iteration of the EEFM to explore scenarios of job growth based on 'business as usual' and the potential for 'enhanced economic growth'.

4.63 The latter scenario, which the Draft Plan confirms underpins its job target, identified that between 2014 and 2036 around 44,000 jobs could be created, an average of 2,000 jobs per annum. It built from the EEFM but applied positive adjustments to a number of sectors which were considered to better reflect local and national growth potential.

4.64 The 33,000-job target in the Draft Plan is explained as being based on:

- A netting off of the 15,000 jobs created to 2018 from the 45,000 jobs forecast in the *Employment, Town Centre and Retail Study*; and
- An extension of the forecast by a further two years to 2038, the extension implied to be based on the latest EEFM outputs.

4.65 Such an approach is considered to have a number of significant limitations:

- The *Employment, Town Centre and Retail Study* is now comparatively dated and should be revisited to ensure it is based on up-to-date economic datasets;
- The GNDP approach to manipulate the previously evidenced job forecast fundamentally fails to take into account the approach taken to generate the enhanced growth scenario or its forecast of job growth over the long-term; and
- At a wider level there have been more marked local and national changes to the economy which have a bearing on the forecasting of future job growth and should be taken into account through an updated evidence base. This will ultimately ensure that the Local Plan takes full account of the current ambitions of the GNDP and the Local Enterprise Partnership, as well as national Government.

4.66 It is noted that in seeking to justify the 33,000-job growth target the GNDP, through the Draft Plan, advance an argument of dismissing the potential for higher growth targets, as have evidently been set previously. **This justification is predicated on questions as to whether 'significantly higher targets' are 'achievable' given 'current economic uncertainties' and the 'enhanced growth' that is ostensibly already provided for.**

4.67 **The suggestion that higher levels of growth would not be 'achievable' does not stand up to scrutiny** when recognised that the target of 33,000 jobs represents a markedly lower rate of growth than that which has been seen in recent years, as used in the GNDP derivation of its target. The last three years alone have cumulatively seen nearly half as many jobs created than are assumed to be created over the much longer twenty-year period covered by the target.

4.68 The NPPF confirms that *"planning policies should...set out a clear economic vision and strategy which positively and proactively encourages sustainable growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration"* (NPPF Paragraph 81a). In the context of economic growth priorities provided by the Cambridge-Norwich Tech Corridor and **the importance of the New Anglia Local Enterprise Partnership's existing Norfolk and Suffolk Economic Strategy (NSES) and the emerging Norfolk and Suffolk Local Industrial Strategy (LIS)**, it is undoubtedly appropriate for the Draft Plan to target an enhanced level of employment growth than implied by trend-based or 'off-the-shelf' forecasts. **Given an evolving economic strategy context, the reliance on forecasts presented within a study produced in 2017 creates a concerning risk that the latest understanding of this growth potential is not fully captured. The strength of the local economy in creating new jobs would imply that whilst it represents an 'enhanced' outlook of growth it appears unduly modest when compared to this historic success.**

- 4.69 We therefore, consider that to support the enhanced levels of economic growth that are evidently capable of being achieved and should be encouraged, the Plan should seek to make further provision for employment opportunities and these should be well located to the economic priority area – most significant the Tech Corridor. Supporting the continued success of Norwich Research Park should also be a key objective and should be promoted through ensuring new homes as well as complementary employment opportunities are made available at SGV.
- 4.70 **The SGV proposition includes a 'Tech Hub' which has the potential to offer a range of flexible** employment land opportunities associated with the key sectors of agri-tech and energy. As such an allocation at SGV would provide a necessary increase in the jobs target for the Plan and this would be supported by an interrelated increase in the number of homes to support these jobs. **This is further explained in the 'Technical Review of Housing Needs in Greater Norwich'** Report by Turley, February 2020, included at Appendix 3 which indicates a minimum of 40,000 jobs should be planned for in the GNLP.
- 4.71 We also note and support the importance of Hethel as a key economic destination in the Tech Corridor. We therefore consider it critical that the current employment uses at Hethel are not compromised through incompatible development and its potential to expand as an employment hub should be safeguarded. This would align well with a strategic Garden Village allocation at SGV.

16. Do you support, object or which to comment on the approach to Review and Five year housing land supply?

- 4.72 The GNLP suggests that a review will be undertaken in five years in accordance with the NPPF. We consider that unless the GNLP undertake a significant review of the spatial growth strategy and increase housing and job targets to ensure the plan is optimistic; boosts the supply of housing; and will deliver the levels of economic growth required, then a much sooner review should be undertaken.
- 4.73 The Plan makes reference to the potential for a new settlement in a future review of the Plan and given the inclusion of contingencies, there is a suggestion that there are weaknesses in the current **plan that need to be addressed 'next time around'**. If these weaknesses are not to be addressed in the Reg 19 plan, then in this context, an early review of the Plan would be essential.

17. Do you support, object or wish to comment on the approach to infrastructure?

- 4.74 It is very clear that the A11 offers benefits in terms of supporting new growth as a result of its recent improvement. This sets it apart from other elements of the strategic network that still require investment. In drawing up a spatial growth strategy it is important that the use of existing infrastructure is prioritised above areas where substantial investment is required. The potential of the A11 being readily able to accommodate growth should be maximised in this context.
- 4.75 We are also concerned about the lack of alignment between other transport strategies and initiatives and the GNLP. Most acutely, the apparent lack of regard for rail and encouraging a significant modal shift away from the private car.
- 4.76 Wymondham has the potential to function as a public transport hub and this should reinforce it as an excellent location for strategic growth, particularly at a time when there is a global imperative to address the climate change challenge. GNLP should look to Wymondham as an absolute priority area to focus growth around public transport accessibility.

- 4.77 Furthermore, in the context of wider community infrastructure and ensuring that growth does not put further pressure on existing amenities, it is important to note that new settlements as a growth typology are the most sustainable as they have the critical mass to support and deliver the provision of new services and facilities that simply cannot be achieved through smaller developments, even up to 1,500 units.

Consultation Question for Policy 2 – Sustainable Communities

18. Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability requirement.

Consultation responses are welcomed on the likely cost of implementing the proposed energy policy approach locally.

- 4.78 We wholly support the sustainable communities policy. This should underpin the spatial growth strategy and sites that are best able to perform against these sustainability requirements should be the ones selected for allocation.
- 4.79 However, we consider that the Plan does not effectively translate its aims and objectives in relation to delivering sustainable communities into its spatial strategy. It fails to acknowledge the ability of larger strategic scale developments to achieve these policy requirements, many of which are inherent in the design of new settlement scale developments.
- 4.80 The opportunity at SGV truly stands apart from other strategic growth opportunities in its sustainability and energy offer. One of the central features of SGV, as demonstrated in the *Prospectus*, is its ability to be aligned with the delivery of a solar farm on adjacent land under the control of the same landowner.
- 4.81 In this context, Orbit have explored the measures necessary to achieve a NetZero development from the outset and put forward SGV on this basis. The detail of how the scheme could achieve NetZero is set out in Sustainability, Energy and Climate Change Strategy as part of the technical assessment in Appendix 4. To inform this Strategy estimates of possible construction and operational stage carbon emissions and costs estimates to address these emissions to net zero through on-site renewable energy, tree planting and carbon offsetting have been undertaken.
- 4.82 SGV as a prospective allocation would establish an important precedent for the GNLP area in demonstrating how requirements of Policy 2 can be met. It is vital that in preparing Local Plans, policy-makers are proactive in establishing policies to tackle climate change.
- 4.83 It is imperative that GDNP realise their ambitions as set out in Policy 2 in light of the growing global climate change challenge. Without such commitments the GDNP will fall short of making a meaningful contribution in the fight against global climate change.
- 4.84 The use of zero-carbon and energy-positive technology is one of the integral Town and Country Planning Association Garden Village principles which have been used to shape the SGV proposal since its inception. We contend that the use of the Town and Country Planning Association Garden Village principle framework ensures that GV proposals, in particular SGV, are better placed to respond to climate change issues than small – medium scale development as sustainability principles are embedded within the design of such schemes.

Consultation Questions for Policy 4 – Strategic Infrastructure

23. Do you support, object or have any comments relating to the approach to transport?

4.85 Our comments on transport reiterate our earlier concerns regarding the alignment of the growth strategy with transport priorities and investment, summarised as:

- i. The A11 is the spine of the Tech Corridor and has been subject to substantial investment but within the GNLP is not being utilised or maximised to deliver growth;
- ii. Given the future context of East West Rail and improvements on the Norwich to Cambridge line, as set out in the *Rail Prospectus* consultation (2020), the rail network, including the proposed mobility hub at Wymondham, should be given much more focus as an opportunity to support strategic growth in this location;
- iii. If a modal shift is to genuinely be achieved, then new development allocations should be at locations close to, and their transport case absolutely integrated with, railway stations. This is not the case for a considerable number of the currently proposed allocations;
- iv. Appendix 1 of the GNLP sets out infrastructure requirements required to unlock new growth and in the context of the above it appears that a number of strategic allocations are predicated on third party infrastructure investment which is by no means certain (for example, attributing further growth in close proximity to the A47 Longwater Interchange). We consider that this risks undermining the delivery of the GNLP.

Consultation Questions for Policy 5 – Homes

4.86 We support the requirement to provide various different types of housing and highlight the ability of SGV, by virtue of its development partners (Orbit and Bowbridge), to commit to the delivery of a variety of housing types and tenures. The construction of a significant proportion of homes by Orbit – already a key RP in the area - would provide certainty not only over the housing delivery but also the range of tenures that would be provided to ensure local housing needs are effectively met in a timely manner.

Consultation Questions for Policy 7.1 – The Norwich Urban Area

38. Do you support or object or wish to comment on the approach for the city centre?

39. Do you support or object or wish to comment on the approach for east Norwich?

40. Do you support or object or wish to comment on the approach for elsewhere in the urban area?

4.87 In responding to Policy 7.1 we refer back to our comments in respect of Policy 1 (para 4.10 to 4.77 above). In summary we consider there to be serious flaws arising from:

- i. the continued overreliance on East Norwich given past under-delivery;
- ii. the failure to distribute new growth within other parts of the GNLP area to more closely align with local housing needs where they arise and thus avoid market saturation in areas of more marginal viability;
- iii. misalignment between the spatial strategy and the economic priorities of the Plan related to the Tech Corridor; and
- iv. the assumptions over the scale of housing delivery arising from a key regeneration site in the centre of Norwich (Carrow Road) which is subject to considerable and acknowledged uncertainty (see para 4.34 to 4.37 above).

Consultation Questions for Policy 7.2 – the main towns

42. Do you support, object or wish to comment on the approach for specific towns. Please identify specific issues.

- 4.88 We object to the lack of consideration of Wymondham as a strategic growth location. As has been extensively covered elsewhere in these representations, for a variety of reasons Wymondham is an excellent location for accommodating strategic scale growth. In summary:
- It is the largest settlement in the GNLP area outside the Norwich Urban Area;
 - It has a prominent location at the heart of the Tech Corridor;
 - It benefits from immediate access to the recently improved A11; and
 - It is positioned on the Norwich Cambridge Railway line and has a key stopping station subject to programmed station improvements and programmed (faster and more frequent) service improvements.
- 4.89 These factors suggest that Wymondham is a suitable location for new growth, yet it is subject to only two 50-unit allocations in the GNLP. Whilst Wymondham has some existing commitments this has no bearing as to whether it should continue to be identified as a key location for growth. The existing level of growth within Wymondham is not of such significant scale to suggest further development would inhibit delivery.
- 4.90 As is explained in the SGV Prospectus and in paras 4.16 to 4.21 above, Wymondham has been subject to sustained piecemeal delivery though planned and speculative development to the detriment of delivering necessary town-wide services and amenities.
- 4.91 Given its locational advantages and its position in the settlement hierarchy, the case for continued growth at Wymondham is incontestable. It is therefore imperative that the long-term future of the town is planned for comprehensively and safeguarded from further piecemeal growth which delivers no tangible infrastructure or service benefits for the town.
- 4.92 Furthermore, adopting a whole-town growth strategy for Wymondham – which includes strategic growth at SGV – would allow a more robust policy position to be adopted in respect of other key infrastructure objectives. For example, a whole-town strategy could introduce spatial policies to build on Plan objectives of enhancing existing strategic green infrastructure within/around the town and protecting it from inappropriate development, and/or strengthen policies to define and protect settlement/strategic gaps including between Wymondham and Hethersett.
- 4.93 We would welcome the opportunity to engage with the GNLP and local stakeholders to explore this policy position further as part of plan-making activity between now and the Reg 19 stage LP. In order to inform these discussions, set out below is suggested alternative policy framework which could support strategic-scale growth at SGV.

Alternative Policy – ‘Silfield Garden Village’

- 4.94 Silfield is one of three potential new settlement sites identified in the draft Plan for future consideration. No criteria-based assessment framework is suggested for this consideration, nor any policy protection given to these locations as having any preferred policy status (for example, **through an ‘Area of Search’ policy or similar**), and considerable uncertainty arises from the naming of growth future growth locations in such isolation.
- 4.95 At the same time, site allocations have been made in the GNLP – or proposed in subsequent documents – in unsustainable and undeliverable locations (see para 1.13 above).
- 4.96 We consider that rather than being considered in the next review of the plan, for the reasons set out above the GNLP should pursue a spatial strategy which allocates – and specifically identifies land for – a new settlement at Silfield within the current plan to 2038.
- 4.97 We contend that a policy for an allocation of a new settlement at Silfield Garden Village would comprise:
- (a) Identification of the preferred location for a New Settlement south of Wymondham on the Key Diagram;
 - (b) Allocation of the Silfield Garden Village site (red line) for up to 6,500 homes [plus associated uses] in the Site Allocations document;
 - (c) Inclusion of a criteria-based New Settlement policy for Silfield GV identifying the key features and policy requirements of the new settlement – this could include the associated provision of a solar Farm and strategic green infrastructure as indicated by the green boundary on the site plan in appendix 2;
 - (d) Identification of the capacity of the new settlement within Policy 1 and Policy 7.1, reflecting its full capacity of 6,500 new homes plus associated uses, and also identifying the contribution that this allocation will make during the plan period to 2038 (circa 3,700 homes)
- 4.98 Aligned with a new settlement policy would be a redistribution of housing numbers to achieve a more sustainable and deliverable spatial strategy which more closely reflects the wider economic and growth objectives of the Plan. On this basis, we suggest that Policy 1 would be amended to reflect a redistribution of current draft allocations to read:

Suggested revisions to Policy 1 Table

Area	Existing Deliverable Commitment (including uplift + delivery 2018/9)	New Allocations	Total Minimum Deliverable Housing Commitment 2018-2038
Norwich Urban Area	26,165	3,195*	29,360
Main Towns of Wymondham, Aylsham, Diss (with part of Roydon), Harleston and Long Stratton	5,092	1,150**	6,242
Key Services Centres (named)	2,902	515	3,417
Silfield Garden Village		6,500	3,700
Village Clusters (Broadland)	995	480	2,824
Village Clusters (S Norfolk)	1,349	1,200	
Contingency Site Allowance		500	500
TOTAL	36,503	11,840	46,043

*reflects removal of Carrow Works

** reflects removal of two small new allocations

APPENDICES

Appendix 1 – Site Location Plan (Plan ref: SIL001-022).

Appendix 2 – Silfield Garden Village Development Prospectus (September 2019).

Appendix 3 – Technical Baseline Information:

- *Silfield Preliminary Connectivity Strategy (AECOM);*
- *Sustainability, Energy & Climate Change Strategy (Turley);*
- *Technical Review of Housing Needs in Greater Norwich (Turley);*
- *Economic Strategy Statement (Turley)*
- *Cultural Heritage Desk-Based Assessment (RPS);*
- *Preliminary Ecological Appraisal (BSG Ecology);*
- *Landscape and Visual Appraisal (James Blake Associates);*
- *Flood Risk and Drainage Appraisal (Stantec);*
- *Air Quality Baseline Technical Report (AECOM);*
- *Noise Baseline Technical Report (AECOM);*
- *Utilities Assessment – Planning (Stantec); and*
- *Desk Review of Soils & Agriculture at Silfield Garden Village (Land Research Associates).*

Appendix 4 – Illustrative Master Plan (Plan ref: SIL001-021).

Appendix 5 - Connectivity Framework Plan (Plan ref: SIL001-023).