
**Proposed New Settlement
Honingham Thorpe**

**Response to Regulation 19 Consultation of the
Greater Norwich Local Plan**

on behalf of Clarion Housing Group
Ref: 18/011

1. Introduction

1.1 Brown & Co are instructed by Clarion Housing Group (hereinafter 'Clarion') to respond to the pre-submission draft Greater Norwich Local Plan (hereinafter 'GNLP') that is currently at its Regulation 19 consultation stage.

1.2 Representations to the Regulation 19 version of the GNLP can only be made in relation to the legal compliance and soundness of the Plan, in other words whether the Plan has been appropriately prepared in accordance with all relevant procedural and legal requirements, and whether it meets the tests of soundness within paragraph 35 of the National Planning Policy Framework (hereinafter 'NPPF').

1.3 It is considered that the draft Plan is unsound, as the strategy proposed is neither justified nor effective. It is thought that sites GNLPO415A-G, collectively known as Honingham Thorpe, offer an appropriate opportunity to deliver growth differently, creating a truly sustainable community which paves the way for the region to become the UK leader in clean growth whilst raising the standards for design and placemaking.

2. Objection to proposed strategy

Justified

2.1 The NPPF indicates that, to be justified, a Plan should set an appropriate strategy based on robust and credible evidence, with suitable consideration given to reasonable alternatives. It is considered that the proposed strategy is not appropriate and is incompatible with the overall purpose of the plan, in particular, the delivery of sustainable development which meets the challenges of climate change, and supports ambitious local and national targets for carbon neutrality. The proposed distribution of growth is not thought to be suitably forward thinking to facilitate the transition to a post-carbon economy, and the emergence of the region as the UK leader in clean growth. Furthermore, the proposed strategy is not considered suitable to deliver beautiful places or spaces.

2.2 The draft plan indicates that a key objective is *"to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and plays a full part in meeting national commitments to achieve net zero greenhouse gas emission by 2050"* (page 38). The strategy, therefore, seeks to focus activities closer to centres of population, with good access to services and facilities, in order to facilitate a *"radical"* shift away from car travel and reduce associated vehicles emissions.

2.3 However, the proposed strategy seeks to perpetuate traditional methods of development and growth: continuing to 'bolt-on' development to existing communities. However, in times of such rapid change, complex challenges and significant opportunities a change to the status quo is required. Whilst it is agreed that the majority of growth should be within the Strategic Growth Area and well related to jobs and services, it is not considered that continuing to 'bolt-on' development to existing settlements constitutes sustainable development or would significantly reduce emissions. Rather, such housing estates often result in higher densities and lower quality, with little in the way of placemaking and identikit housing, and urban sprawl which reduces 'walkability' (*Policy Exchange, Garden Villages: Empowering localism to solve the housing crisis* (2015)).

2.4 This has recently been echoed by the Building Better, Building Beautiful Commission in their report *Living with Beauty: Promoting health, well-being, and sustainable growth* (2020), which states that *"the model now should be new places, not edge of town extensions"* (Page 39). The commission indicate that *"too much of what we build is the wrong development in the wrong place"* (page 4), leading to mediocre development, widescale opposition and stagnation in the planning process. They note that *"many of the things that make settlements beautiful also make them healthy, happy and sustainable"* (page 11).

2.5 The downfalls of traditional ‘bolt-on’ development have also been recognised by Government, who implemented the Garden Communities Programme as an opportunity to “*build communities with local character, good employment opportunities, strong services, integrated and accessible transport, innovative uses of technology – and beautiful green spaces*” (page 4 MCHLG, Garden Communities (2018)). A recent briefing paper issued by the Town and Country Planning Association (hereinafter ‘TCPA’) reaffirmed this, stating that “*new communities can offer multiple benefits, creating highly sustainable new environments for people while simultaneously increasing the rate of housing delivery and avoiding urban sprawl*” (TCPA, Briefing Paper: Unlocking the potential of large-scale new communities (2021) page 1). The TCPA report notes a number of significant benefits arising from new settlement delivery but recognises that “*above all, following the interlocking Garden City Principles of design and delivery that are necessary for modern, zero-carbon living is the stand-out opportunity offered by large-scale development*” (page 1).

2.6 In order to significantly reduce travel by way of private vehicles, and therefore emissions, a place-based approach is essential (RTPI, Net Zero Transport: The role of spatial planning and place-based solutions (2021) page 2). This would further provide a catalyst for better placemaking in order to deliver healthier, happier and more resilient communities. The RTPI report echoes the Building Better, Building Better Commission in their assertion that creating walkable neighbourhoods is key, stating that the “*20 minute neighbourhood*” concept is one of the key foundations upon which net zero transport networks can be built.

2.7 Traditional largescale ‘bolt-on’ development is unable to stimulate the wholesale changes required to bring about a significant reduction in private vehicle travel and associated emissions. Such strategic development in Greater Norwich has placed pressure on existing infrastructure and communities, resulting in the need for significant investment in upgrades in order to provide power, waste water treatment, roads, and other social infrastructure. The programme of works required to facilitate a number of strategic and non-strategic proposed and existing allocations is significant, requires significant investment and will, and already has, detrimentally impacted upon the timely delivery of development. What results is often large, unimaginative estate development detached from the wider community, local services and facilities and employment opportunities, resulting in a lack of beauty and a lack of connectivity, both resulting in over-reliance upon private vehicles to meet daily needs.

2.8 In order to meet climate change targets, housing need, and support sustainable employment and economic growth, more is required than delivering housing units. Rather, the focus is shifted to the creation of beautiful places and vibrant, resilient communities. A new settlement, based on The Garden City Principles, can deliver such communities together with a wide range of employment opportunities, mixed tenure housing, zero-carbon principles, sustainable transport, comprehensive green infrastructure and local food sourcing, together with comprehensive community governance and long-term stewardship.

2.9 The creation of a new settlement would facilitate a modal shift from car reliance to walking and cycling through the creation of truly walkable neighbourhoods, through the delivery of infrastructure-led communities, properly planned to meet the needs of future residents with all essential social infrastructure within the village centre and a wide range of employment opportunities across the settlement. As such it is considered that a new settlement would provide a suitable option for development now and represents the most effective way to significantly reduce transport emissions, and to create truly beautiful places and spaces.

2.10 Clarion have the ability and experience to deliver a new settlement at Honingham Thorpe, listed as a Reasonable Alternative, which would overcome the issues and challenges of traditional housing development. The proposed new settlement is first and foremost about the creation of a healthy and resilient community: providing those services and facilities required to meet the day-to-day needs of residents within walking distance. An integrated multi-modal and accessible infrastructure system predicated on a green infrastructure network, supported by public transport enhancements and community transport schemes would ensure that walking and cycling form the primary modes of transport throughout the settlement, therefore significantly reducing transport emissions whilst creating beautiful spaces.

2.11 The proposed new settlement Honingham Thorpe incorporates the Food Enterprise Park (hereinafter 'FEP'), a strategic employment site supporting the high impact agri-tech economic growth area. Development has already commenced at the FEP and the first unit complete and occupied. As one of the three high growth sectors for the region it is vital to support the development of the agri-tech corridor, linking the FEP and Norwich Research Park, with suitable housing growth to attract highly skilled workers and further investment to the area. The proposed settlement would support the delivery of the Food Enterprise Park and facilitate improved links with Easton College, delivering a holistic approach to the agri-tech sector and emerging agri-tech corridor from grassroots through to world leading research and technology, and creating a circle economy.

2.12 Overall, Clarion support the draft policies contained within the GNLP which seek to enhance sustainability, biodiversity, and resource conservation, and those which seek to ensure a range of housing is provided to meet needs across the spectrum. Indeed, it is considered that it would be a missed opportunity if these were to be diluted, and there should be no reason for these elements to not be the norm for future development. Delivery of a new settlement in the Greater Norwich area would provide the most effective and efficient way to ensure that these elements are delivered, with purpose-built service and social infrastructure to embed climate resilience within the fabric of the community. The proposed new settlement Honingham Thorpe would be zero carbon compatible, Clarion consider that the investment is necessary in order to create healthy, resilient, and vibrant communities, to meet the challenges of climate change, and to create a positive change for future generations.

Effective

2.13 In order to be considered effective, the NPPF states that the proposed strategy should be deliverable over the plan period. It is proposed to meet housing need over the plan period through the allocation of new sites, however the vast majority of need is proposed to be met through the rolling forward of existing allocations totalling 75% of the overall housing figures. By definition, those sites being carried forward have failed to deliver during the previous plan period, as such they should be subject to enhanced scrutiny and robust evidence of their delivery with the new plan period required.

2.14 It is not considered that such evidence has been sought or provided for a number of sites, and so their inclusion within the emerging plan cannot be justified. Indeed, a number of allocations proposed to be carried forward do not have a developer on board, currently support other uses, and in many instances have already been carried forward from previous Local Plan iterations. The continued reliance on such sites undermines the plan making process and places the strategy for growth at risk as a result of continued non-delivery and subsequent land supply impacts opening the door for opportunistic largescale development which undermines place-making, sustainability and climate resilience.

2.15 Many such sites are focussed within the urban area and fringe parishes, in particular those within the Growth Triangle which is anticipated to deliver only 40% of the growth previously anticipated by 2026 according to 2018/19 projections, with actual delivery likely short of this as a result of the impacts of delays in obtaining planning permissions and the global pandemic. As a key focus area for growth, those sites proposed for allocation should robustly evidence their delivery. It is noted that the current iteration of the GNLP proposes the removal of a small number of previous allocations throughout as a result of insufficient evidence of delivery, and this is welcomed. However, it is considered that there are a number of other sites which have the same issues and should also be removed.

2.16 Demonstrating deliverability is fundamental in order to achieve sustainable, well-planned development. As has been evidenced with Local Plans across the country, proposed allocations, particularly those for large-scale housing, can falter where it is considered that sufficient work has not been undertaken to robustly demonstrate their viability or deliverability. In order to provide an effective strategy that would deliver the requisite housing within the plan period to meet local needs, it is considered necessary to remove a number of allocations proposed to be carried forward and to allocate a site for a new settlement.

2.17 Provision of a new settlement provides the opportunity to deliver a community and landscape led development, with all of the necessary social, community, retail and commercial services and facilities required to meet residents day-to-day needs, predicated on significant green infrastructure. It is Clarion's desire to create a self-contained settlement which truly minimises the need to rely upon private vehicle travel and maximises sustainability, creating the foundation of zero-carbon compatible development and a circle economy.

2.18 As the country's largest housing association and one of the leading developers, Clarion have significant experience, scale and financial strength that enable them to deliver a new settlement at Honingham Thorpe which would overcome the issues and challenges of traditional housing development. They are committed to delivering outstanding places from the grassroots up, recognising that beautiful and sustainable places start with landscape and community. Their ability to switch between tenures to allow for the release of funds, affords them the opportunity to do this, allowing for early delivery of community facilities, landscape and infrastructure, which in turn increases demand for dwellings. The ability to switch between tenures further allows for Clarion to continue to deliver dwellings throughout periods of economic downturn.

2.19 Clarion would be master developer, providing fully serviced parcels of land for sale to local, regional and national developers, therefore allowing for increased delivery rates, with tight control retained over the quality of space and place through a Design Code. Their experience has demonstrated that the continual review of design and construction methods, together with an evolving supply chain and marketing strategy can further support enhanced delivery rates.

2.20 The proposal site is within a single landownership, as a result there would be no lengthy disputes regarding which elements of the development come forward first, no time-consuming discussions around equalisation, and no negotiations over the distribution of infrastructure cost, all of which can cause significant delay and even permanently stall projects. The landowner's priorities align with those of Clarion in terms of the delivery of a community predicated on the Garden City Principles and a place-first approach. As such, the proposed development could come forward quickly and achieve a significant delivery rate throughout.

3. A new settlement at GNLPO415A-G

3.1 Clarion support the principle of draft Policy 7.6, signposting the need for a new settlement within the Greater Norwich area. The policy signals recognition of the significant benefits in providing a comprehensive approach to place, space, design, beauty, sustainability, and infrastructure. However, it is considered that a development of a new settlement would be a suitable option within the current emerging GNLPO. In order to meet ambitious net zero targets, it is imperative that significant changes are made to the way development is delivered.

3.2 Sustainability underpins Clarion's long-term strategic objectives, and they were the UK's first housing association to adopt the Certified Sustainable Housing Label, which mirrors the principles adopted by the UN that have become the benchmark for impact investing. As the creation of truly sustainable communities where people can thrive is at the core of Clarion's mission, they intend for the proposed new settlement Honingham Thorpe to be carbon neutral. A comprehensive multi-functional green infrastructure network as the foundation of the settlement, and the integration of climate resilience into the fabric of the community would support the transition to a post-carbon economy and help promote the region as an area of clean growth.

3.3 The proposed new settlement is first and foremost about the creation of a healthy and resilient community. As such it is essential to provide an integrated multi-modal and accessible infrastructure system predicated on the green infrastructure network, supported by public transport enhancements and community transport schemes would ensure that walking and cycling form the primary modes of transport throughout the settlement. A key element of the proposed new settlement would be the delivery of a new country park and nature reserve to the south, along the Yare River Valley. The ability of people to access

green open space has been in the spotlight more than ever over the last twelve months and can have benefits for health, mental well-being, education, and the environment. In the 2019-20 financial year Clarion delivered £130 million of social value, an increase of £5 million from the previous year.

3.4 Those services and facilities required to meet the day-to-day needs of residents would be available within walking distance from the inception of the community, including education and employment. The settlement would be designed to capture as much of the travelling between uses within neighbourhoods without the need for residents to undertake lengthy journeys. It is recognised that a new settlement could not provide every facility for its residents, nor should it detract from the leisure and retail focus within Norwich, therefore assessment would be undertaken to ensure that the services are complimentary to those already available in the surrounding area, with provision made for a dedicated bus link into the city centre.

3.5 It is not considered that the proposed new settlement Honingham Thorpe would be subject to the same constraints to timely delivery as large 'bolt-on' developments. The settlement would be predicated on a purpose-built infrastructure network, preventing many of the timely and costly delays often experienced from having to upgrade local systems. A new grade separated junction to the A47 immediately north of the site it already committed by Highways England, with work anticipated to commence in 2022/23. Additionally, Clarion have significant experience in delivering development focused upon the creation of beautiful places, and in delivering a range of tenures and meanwhile uses to meet needs and generate momentum, thus allowing for maintained delivery throughout periods of economic change, as evidenced by the activity of Registered Providers during the last recession.

3.6 Development at the site is already underway within the FEP, with Condimentum already operating from the site and plans for a range of other businesses, including the Food Innovation Centre. Additionally, the adjacent Honingham Thorpe Farms site currently provides employment for over 200 people. It is essential to support the sustainable development of these employment opportunities through the provision of high-quality housing in order to attract current and potential employees and additional investment, and through support for education and skills development.

3.7 Clarion believe that education and skill development is key to securing a pool of high skilled employees, supporting the Greater Norwich offering as a 'clean growth region'. They operate an employment and training service which is free to all of their residents, and work with a wide range of employers from the NHS to Primark. Clarion Futures has supported over 1,000 people into apprenticeships across 100 industries, providing pre-employment courses to develop confidence and skills together with a mentoring programme. They support over 65 community centres across the country which provide volunteering programmes and digital training. Clarion also take part in an innovative employment and business start-up scheme, and believe that supporting the needs of small, medium and start-up businesses is imperative in order to boost the local economy. Throughout their developments Clarion leverage their partners to provide a variety of educational and employment opportunities at all stages of delivery.

3.8 The proposed new settlement Honingham Thorpe would provide support for skills, education, and life-long learning. It would generate a holistic approach to the agri-tech sector and emerging agri-tech corridor from grassroots through to world leading research and technology in combination with the Food Enterprise Park, Norwich Research Park and Easton College. A range of flexible spaces would be provided within the village centre for small and start-up businesses, whilst provision would be made to support working from home. Employment should not be seen in isolation but in conjunction with a holistic approach to delivering growth, to allow people to live and work in the same area.

3.9 Their role as Master Developer and Master Builder would ensure that they retain tight control over delivery and standards, maintaining a presence on site from day one. They would allow for serviced parcels of land to be offered to the market, including to national, regional and local developers, which in turn would help to increase the pace of delivery on site. Clarion would also welcome the involvement of the Local Authority Housing Companies in delivering the proposed new settlement.

3.10 Delivery of Honingham Thorpe would align with the vision and objects of the Greater Norwich Local Plan, and national planning policies, it would support the development of an agri-tech corridor as one of the three high growth sectors within the Norwich-Cambridge Tech Corridor and would support the transition to a post-carbon economy. In order to truly meet the challenges of climate change and the transition to a

post-carbon economy it is vital for growth to be delivered differently within Greater Norwich, Honingham Thorpe would provide the opportunity to do this, delivering a truly sustainable settlement based on the Garden City Principles, which paves the way for the region to become the UK leader in clean growth.

4. Conclusions

4.1 The GNLP in its current form is not considered to be sound as the strategy fails to adequately deliver on the overall purpose of the plan, in particular addressing the challenges of climate change and supporting ambitious local and national targets for carbon neutrality. The proposed distribution of growth is not thought to be suitably forward thinking to facilitate the transition to a post-carbon economy or to create truly beautiful places or spaces. The draft GNLP recognises the need to deal with the challenges of climate change and carbon neutrality and adapt accordingly, however it seeks to deliver growth through a traditional delivery model which perpetuates inherently inefficient, unsustainable, and uninspiring development.

4.2 Additionally, the strategy is considered to be ineffective as there is a significant reliance upon sites which have failed to deliver during the current plan period, with some sites having been originally allocated in previous iterations of the Local Plan, dating as far back as 2004. Continuing to roll forward sites which have failed to deliver in line with the housing trajectory places the strategy for growth at risk and undermines the Plan led approach. Insufficient evidence has been provided to demonstrate the ability of these, and other sites, to deliver within this plan period, with a number of sites having no promoter or developer on board.

4.3 A new settlement at Honingham Thorpe, GNLP4015A-G, would offer the opportunity to provide housing in a holistic and sustainable way in order to create a vibrant and resilient community and support the move to a post-carbon economy. Government has recognised the role that new garden settlements can have in achieving sustainability and creating communities, where there is no choice between quality and quantity and green spaces amount to more than token verges and squares. Provision of a Country park, with enhanced provision to the Wensum and river valley, would create a significant area of green space, something which has become more important than ever in light of the pandemic. The relationship of the site with the Food Enterprise Park would support a key growth area and the emerging agri-tech corridor, creating a holistic and mutually supportive relationship between the new community, the Food Enterprise Park, Easton College, Norwich Research Park and the UEA.

4.4 As the country's largest housing association and a registered charity, Clarion have an exemplary record for quality, social and environmental responsibility, delivery at scale and an unrivalled commitment to legacy, stewardship, and community issues. They recognise that quality and social purpose must be at the heart of development, and that the opportunity to develop on a large scale brings with it both dedicated to delivering an exemplar settlement which embodies the traditional Norfolk settlement, supports the region's world-renowned Agri-Tech corridor, considers the UK's commitment to reduce carbon emissions to net zero by 2050, helping to place the area at the forefront of the transition to a post carbon economy.

4.5 Clarion support the aims of the GNLP to provide better places, with multi-functional green spaces seeking to enhance the landscape, biodiversity, and connectivity, as well as the draft policy requirements for water conservation, energy efficiency, and decentralised energy generation as a means of contributing to national targets for carbon neutrality. However, the proposed carrying forward of allocations and concentration of growth to existing urban areas is considered to be misaligned with the aspirations of the Greater Norwich Local Plan, particularly in the context of Norwich City Council having declared a climate emergency and pledging to be carbon neutral by 2030, and the national target of 2050. Such an approach is considered to fail to adequately adapt to the changing circumstances and priorities of the Greater Norwich area, and beyond.