

FAO: Greater Norwich Local Plan Team
County Hall
Martineau Lane
Norwich
NR1 2DH

BY EMAIL ONLY: gnlp@norfolk.gov.uk

23847/A3/HL/sl
22nd March 2021

Dear Sir/Madam,

**RE: GREATER NORWICH LOCAL PLAN (GNLP) – PUBLICATION STAGE
REGULATION 19 CONSULTATION, FEBRUARY - MARCH 2021
SITE REFERENCES GNLP2170 ('LANGLEY NORTH') AND GNLP2171 ('LANGLEY SOUTH'), AND
PINEBANKS AND GRIFFIN LANE, THORPE ST ANDREW**

We write in respect of the above consultation and on behalf of our Client, Berliet Limited, to provide comment and to make representations in respect of the sites referred to above, which are in the control of our Client.

We wrote to you previously in respect of these sites and in response to Stage C of your Regulation 18 Draft Plan consultation. Our letter, dated 16th March 2020, is enclosed as **Appendix 1**. The representations contained within that letter remain relevant, and a such should be taken forward as part of our representation on behalf of Berliet Limited and in response to this Regulation 19 consultation.

We would add the following:

- i. Policy 5 – Homes –we welcome the acknowledgement that high costs can have an impact on viability, and the adjustment to this Policy at 'Affordable Housing, 1st bullet, (b)' for brownfield sites. However, it is our view that this approach should not be restricted solely to brownfield sites. All sites within the Norwich Urban Area and Fringe will by their urban nature be constrained and will face the same challenges as City centre sites, and it is our view that the same flexible approach should be applied to those sites, with the lower 28% threshold being applied. As acknowledged by the proposed amendment to the Policy, this would need to be supported by viability evidence; and
- ii. Policy 7.1 – The Norwich Urban Area including the fringe parishes – we continue to object to this policy on the grounds that there are no new allocations, including those proposed at GNLP2170 and GNLP2171, within the Thorpe St Andrew area. These sites were considered to be reasonable alternatives within the HELAA and are sustainable urban previously developed sites. There is no evidence to support the development of these sites as resulting in a loss of playing pitches, and the presence of Ancient Woodland is not considered to be a barrier to their development, rather an asset to be managed and protected within a redevelopment scheme.

We would be grateful if you could acknowledge receipt of these representations. We would be grateful if you could continue to keep us apprised of the next steps in this consultation process. If you require any further information then please do not hesitate to contact me.

Yours faithfully

HANNAH LEARY
Planning Associate

Cc: Ben Burgess	-	Broadland District Council
Charles Judson	-	Broadland District Council
Stephen Chatfield	-	Ocubis
Joe Beasley	-	Ocubis
Robin Meakins	-	Barton Willmore

APPENDIX 1
BARTON WILLMORE LETTER DATED 16TH MARCH 2020

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

BY EMAIL AND POST: gnlp@norfolk.gov.uk

23847/A3/HL/sl
16th March 2020

Dear Sir/Madam,

**GREATER NORWICH LOCAL PLAN (GNLP) – DRAFT STRATEGY AND SITE ALLOCATIONS
STAGE C - REGULATION 18 CONSULTATION, JANUARY - MARCH 2020
SITE REFERENCES GNLP2170 ('LANGLEY NORTH') AND GNLP2171 ('LANGLEY SOUTH'), AND
PINEBANKS AND GRIFFIN LANE, THORPE ST ANDREW**

We write in respect of the above consultation and on behalf of our Client, Berliet Limited, to provide comment and to make representations in respect of the sites referred to above, which are in the control of our Client.

We respond as follows:

DRAFT STRATEGY

- i. We support the plan objectives as set out at Paragraph 135 of the Draft Strategy document, and in particular the need to make efficient use of land for housing, particularly given the long-term and historic challenges faced in the GNLP as regards the delivery of housing against targets;
- ii. Policy 1 – The Sustainable Growth Strategy – we broadly support the aims of Policy 1 but would support the Alternative Approach suggested in respect of the need to allow for additional windfall delivery to contribute towards the Plan targets. It is our view that, in light of the plan objectives referred to above, there may be scope for sites which are already consented (and in some cases where permissions have been implemented) to deliver additional residential units over and above the number consented – subject to the necessary planning approvals. It is our view that such an approach would be particularly appropriate within the Norwich Urban Area where sites are sustainably located;
- iii. Policy 2 (iii) – Delivery Plans – whilst we support the need for the delivery of housing in order to meet targets (both in 5YHLS terms and across the longer Plan period), and we recognise the role of Delivery Plans in helping to ensure that delivery occurs, we believe that such Delivery Plans need to take account of the following allowances in order to work effectively:
 - a. Changes in market demand;
 - b. Viability challenges; and
 - c. Delays arising within the planning system or through the public engagement process;
- iv. Policy 5 – Homes – whilst we welcome the acknowledgement that high costs can have an impact on viability, and therefore the ability of sites to deliver 33% affordable housing, it is our view



FS 29637

Registered in England
Number: 0C342692

Barton Willmore LLP
Registered Office:
The Blade
Abbey Square
Reading
RG1 3BE
F/ +44 (0)118 943 0001

that this approach should not be restricted solely to the City centre area. All sites within the Norwich Urban Area will by their urban nature be constrained and will face the same challenges as City centre sites, and it is our view that the same flexible approach should be applied to those sites, with the lower 28% threshold being applied. It is acknowledged that such a flexible approach would need to be supported by viability evidence;

- v. Policy 7.1 – The Norwich Urban Area including the fringe parishes – we object to this policy on the grounds that there are no new allocations, including those proposed at GNLP2170 and GNLP2171, within the Thorpe St Andrew area. We will deal with the Site Allocations further below, and this objection should therefore be read in the context of the objections and comments below; and
- vi. Appendix 1 – Infrastructure Requirements – in respect of 'Sports and Leisure' we note that the Greater Norwich Sports Facilities Strategy is currently being reviewed. On this basis, we would question the ability of any decisions or judgements to be made in respect of proposed site allocations on the grounds of sports or leisure provision. We have commented further in this respect below in relation to the Site Allocations, and this comment should be read in the context of the comments below.

SITE ALLOCATIONS

- i. We object to the omission of the GNLP2170 and GNLP2171 sites from the Site Allocations, and the identification of these sites as being 'Unreasonable Sites' for the following reasons:
 - a. At Stage 2 of the HELAA, both sites were given 'Green' ratings in respect of site access, open space/GI, and transport and roads, and as a result of this and their other ratings they passed the Stage 2 assessment and were considered to be 'reasonable alternatives' and therefore 'suitable sites';
 - b. Stage 4 concluded that both sites were still considered to be 'reasonable alternatives'. In relation to GNLP2170 (Langley North) it was noted that access to the site was to be via the adjacent Pinebanks site which already benefits from an outline planning approval, and that subject to overcoming the Sport England objection in relation to loss of playing fields (and a requirement for replacement before development commences) the site is considered to be a reasonable alternative.

At this point we should refer to the comments made above in relation to Appendix 1 of the Draft Strategy, and the absence of an up-to-date Sports Facilities Strategy for the area. In addition, it should be noted that the 2018 Draft Playing Pitch Strategy concluded that whilst there was a shortfall of 6 rugby pitches in the GNLP area, that the significant spare capacity of football pitches could be utilised to make up this shortfall. It is also interesting and important to note that, having reviewed the playing pitch audits undertaken as part of the preparation of the Strategy, the Former Langley School pitches were not recorded. It is therefore considered that their loss would not result in any additional deficiency over and above that already referred to.

In relation to GNLP2171 (Langley South) it was noted that access to the site would be via the previous Yarmouth Road access so there were 'no obvious concerns', and that subject to managing the constraint of the Ancient Woodland the site remains a 'reasonable alternative';

- c. At Stage 6 of the HELAA, detailed assessments of the reasonable alternative sites were undertaken. In respect of both GNLP2170 and GNLP2171, Highways commented that both sites were acceptable subject to an access strategy. In other words, Highways did not object to the inclusion of the two sites. Development Management commented that:

- They were not convinced that estate-scale development could be delivered due to the site constraints, although these constraints weren't identified;
- Queried whether the allocation should be open-ended in terms of housing numbers; and
- Identified the need for a masterplan and/or a Design Code to be prepared;

It is not clear what the site constraints were to which Development Management referred, as no significant constraints or 'showstoppers' were identified by other consultees; and

- d. At Stage 7, the preferred sites were identified, and both GNLP2170 and GNLP2171 were dismissed on highways and ecological/landscape grounds, despite there being no objections from Officers on those grounds. This exclusion of the sites from being identified as being preferred sites and therefore becoming site allocations does not reflect the conclusions of the earlier stages of assessment, and on those grounds, we object to the exclusion of these two sites from the Site Allocations.

We do not believe that there are sufficient grounds on which to exclude these sites from the Allocations, for the following reasons:

- Both sites are previously developed, and in the case of GNLP2171, have a significant developed footprint;
- These sites either have an existing access in place, or can be accessed via land within our Client's control and via a site already benefitting from outline planning approval for residential development;
- There is no up-to-date evidence available at this stage to suggest that the development of GNLP2170 will result in a loss of playing pitches, or any further deficiency in playing pitches; and
- We note and are aware of the Ancient Woodland constraint on GNLP2171, but it is our view that this does not preclude the residential development of what is a previously-developed and sustainably located site on which the principle of development has been accepted.

We would be grateful if you could acknowledge receipt of these representations. A hard copy of this letter will follow in the post. We would be grateful if you could continue to keep us apprised of the next steps in this consultation process. If you require any further information then please do not hesitate to contact me.

Yours sincerely

HANNAH LEARY
Planning Associate

cc.	Ben Burgess	-	Broadland District Council
	Charles Judson	-	Broadland District Council
	Stephen Chatfield	-	Ocubis
	Robin Meakins	-	Barton Willmore