

Greater Norwich Local Plan Team
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16th March 2020

By Email Only

Our ref:
SIL001/HP/HPF/MH/IW

Dear Sirs,

**Greater Norwich Local Plan – Regulation 18c Consultation
Submission**

SITE REFERENCE: GNL4057 - PARK FARM, SILFIELD

I am writing on behalf of the team led by Orbit Homes (Orbit) regarding the Regulation 18c consultation of the Greater Norwich Local Plan (GNLP). David Lock Associates (DLA) are instructed by Orbit as the master planners and planning consultants for a strategic scale new settlement within South Norfolk, known as Silfield Garden Village (**SGV**).

The land for the proposed Garden Village lies under the single ownership of J Alston and Sons, a family with a long association with the local area. Orbit Homes is the development arm of the Orbit Group, one the largest Registered Providers in the UK. As one of the UK's leading housing providers, Orbit owns and manages a growing portfolio of more than 43,000 homes. Orbit delivers around 1,700 new properties to market per year: over the last 8 years, Orbit Homes has delivered 12,000 homes and will deliver a further 10,000 by 2025.

Orbit Homes is now a strategic Partner of Homes England Homes England, currently delivering over 2,700 homes for Homes England across the group up to 2024 and looking to extend this partnership up to 2029 and beyond.

Orbit are supported by Bowbridge Strategic Land, a company whose team has a depth of experience and a significant track record in delivering development on large scale projects both nationally and locally. Bowbridge Strategic Land have an extensive track record of delivery with recent examples at Ebbsfleet Garden Village and Martello Lakes, Hythe.

More locally, Bowbridge can demonstrate a good knowledge of the East Anglian market, local issues and priorities through involvement at development sites at Attleborough, Wymondham, Hethersett and Norfolk and Norwich Hospital.

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Background and Previous Submissions

A number of sites related to the current SGV proposal area have been promoted on behalf of the landowner in previous rounds of the local plan for large scale development. These sites have been subject to assessment under stages 1-4 or further as part of the Sustainability Appraisal undertaken by the GNDP to date.

In 2019, following a review of the Alston landholdings in this area and taking a holistic view of master planning for a Garden Village, the landowner has committed to the comprehensive promotion of land as a single entity. This will help secure a truly sustainable new settlement proposition and will enable long-term future growth and infrastructure associated with strategic growth south of Wymondham to be properly planned.

Therefore, going forward, we suggest that the various sites previously submitted under separate representations are consolidated into a single site promotion as Silfield Garden Village. The individual sites are listed in para 2.2 of our representations on the GNLP Strategy, but their entries and details as expressed in the current GNLP material are reproduced below for ease of reference:

| Site Ref (HELAA/SEA) | Name | Site Use | Area (ha) | No of Dwgs |
|-------------------------|---|--|--------------|---------------|
| GNLP reference 2168 | Park Farm, Silfield | Residential (new settlement) | 340.28 | 6,500 |
| GNLP reference 0515 | Land at South Wymondham. North of A11 and West of Park Lane | Residential, Community, open space and GI | 112.90 | 1,500 |
| GNLP reference 0402 | Land to the north-east of Silfield Road, and south of the A11 | Residential, infrastructure, community uses and open space | 26.87 | 800 |
| GNLP reference 0403 | Land to the south-west of Silfield Road, and south of the A11 | Residential, infrastructure, community uses and open space | 13.30 | 400 |

Silfield Garden Village Development Prospectus

The GNLP authorities will be aware of DLA's involvement in the promotion of SGV following discussions with officers and the informal submission of a *Development Prospectus* for Silfield Garden Village in September 2019.

Through informal discussions it was made clear delivery considerations are a key issue for GNDP, particularly in relation to the consideration of strategic scale growth. The *Prospectus* provides detail on the unique delivery model being adopted by Orbit and Bowbridge, the approach to early delivery and the availability of early investment.

This *Prospectus* is now formally submitted as part of this consultation.

Regulation 18c Representations

The information in the Development Prospectus underpins our representations to the Reg 18c Plan now under consideration.

Following discussions with officers, it was understood that further technical details on the SGV proposal would be welcomed to allow robust assessment and consideration of the site through the local plan process. This information is submitted as part of these representations.

Therefore, the SGV representation submission includes:

1. Covering Letter – general introduction and commentary on GNLP procedural / administrative matters:
2. Main SGV representation addressing issues relating to the *GNLP Strategy Document*. This representation includes the following appendices:
 - a. Plan ref: SIL001-022: SGV Site Location Plan, showing the Core Area proposed for SGV (451 ha) and the adjacent area for strategic Green Infrastructure and Solar Farm (15 ha);
 - b. *Development Prospectus* dated September 2019 previously submitted informally to GNLP;
 - c. Technical submissions prepared by the consultant team between October 2019 and March 2020:
 - *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)*.
 - d. Plan ref: SIL001-021 SGV Illustrative Master Plan, updated as a result of the technical assessment work; and
 - e. Plan ref: SIL001-023 SGV Connectivity Plan, updated as a result of the technical assessment work.

3. SGV representation addressing issues relating to the *GMLP draft Sites Document*;
and
4. SGV representation addressing issues relating to the *GMLP Sustainability Appraisal*.

We would be grateful that you could provide confirmation that all the above representations and supporting documents have been received in full and will be considered as part of the Regulation 18c consultation of the Proposed Greater Norwich Local Plan 2018-2038.

Procedural Concerns

We wish to raise a number of general procedural and presentational concerns with the GMLP Regulation 18c consultation. Firstly, we consider that the way in which the documents on the webpage are presented make it difficult for interested parties and members of the public to navigate to the document they require. In addition, the pages upon which some documents are presented lessen their importance but are of equal 'status' as part of the GMLP Regulation 18c consultation. For example, the site assessment booklets are not presented on the same page as the 'Key documents / evidence' page. However, the GMLP consultation welcomes comments on these documents in the same way that comments are invited on the 'Key documents / evidence' page.

Secondly, we are concerned that consultation documents are being updated during the consultation period (for example, the *Interim Draft Water Cycle Study* dated February 2020). Whilst it is acknowledged that this is a 'live' document (and as such subject to updates) it is not common for such documents to be updated during a consultation period. This creates the possibility that an interested party may have made comments on an earlier version of the document in the initial stages of the consultation period; comments which may be out of date or obsolete due to the updates to that document.

Thirdly, and critically, we strongly question the approach of the GMLP in seeking to rely on numerous Development Plan Documents (DPDs) – which will number 7 in total including the GMLP when adopted - rather than seek to consolidate primary local plan policy into a single joint Local Plan.

Continuing with this piecemeal approach will undermine the effectiveness of the GMLP and will not result in a holistic GMLP development strategy or development allocations which have been robustly and cumulatively assessed. We note that the National Planning Policy Framework (NPPF), in describing the plan-making framework, allows for flexibility in the way that plans for the development and use of land may be produced. However, NPPF paragraph 16(d) states that Plans should "*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*"

We do not consider that setting development strategy and objectives, development allocations and development management policies across 7 different DPD documents prepared, tested and examined at different times will enable decision makers to make effective planning decisions. As such, we strongly suggest that the GMLP reconsiders its current approach and for the Regulation 19 Plan brings together the relevant policies and allocations into a single comprehensive Local Plan document for Examination and adoption.

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We would be happy to discuss these matters further with you. Please do not hesitate to contact me if you require any further information.

Yours sincerely,

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SENIOR ASSOCIATE

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cc: Ian Fieldhouse, Orbit Homes
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