
Matter 1

Issue 1: Has the Partnership met the statutory duty to co-operate as set out under Section 20(5)(c) and 33A of the Planning and Compulsory Purchase Act 2004?

Q2: Have all relevant strategic matters been identified and has the process for identification been robust?

1 Lack of justification to support recreational open space allocations

- 1.1 The plan allocates land for recreational open space in a small number of locations. While our client's particular interest is with the allocation at Hellesdon under reference HEL4/GNLP1019 which we use to illustrate the concern, our representations relate to the general strategic point referred to in Q2 above.
- 1.2 The consideration of the need for and suitable location of standalone recreational open space appears to be a strategic matter with which the plan purports to occupy itself with. However, there is no robust process to quantify need, consider alternative forms of provision or assess the suitability of identified locations for recreational open space.
- 1.3 Our representations submitted to the Regulation 19 stage of the Local Plan offered the Partnership the opportunity to direct readers of the Local Plan to the appropriate evidence. No direction has been forthcoming.
- 1.4 Our representations explained how the plan's evidence base has failed to justify the allocation of 11.9 hectares of land for recreational open space at Hellesdon [HEL4/GNLP1019]. The reason for allocating the site stated in the Horsford Non-Residential Booklet [Doc B1.48] merely refers to the site's previous allocation in the Broadland Local Plan 2016 (to be replaced by the Greater Norwich Local Plan) - "*The site is the same as existing allocation HEL4 from the Broadland Local Plan. HEL 4 is allocated for recreational open space. Site GNLP1019 seeks to maintain this allocation in the new local plan to 2038*". The same statement is repeated in the Partnership's responses to our client's objection to the allocation at both Regulation 18C [Doc A8.13 page 81] and Regulation 19 stages [Doc A8.20 page 50] of the plan with the addition of the words "*due to the need identified at Hellesdon*". Our Regulation 19 representations confirm that the only evidence to justify the provision of recreational open space of the type allocated in HEL4/GNLP1019 produced by the Partnership or constituent local planning authorities is, on its own admission, "*out of date and obsolete*" [reference Greater Norwich Growth Board agenda 24 September 2020 attached to CODE Regulation 19 representation 16 March 2021]. No further independent and robust evidence to justify the allocation has been produced.

Recommended remedy

- 1.5 We recommend that in the absence of any justification for the allocation of land for public recreational open space the preferred allocation of HEL4/GNLP1019 should be deleted.

2 Strategy for provision of housing allocations and contingency site¹

- 2.1 We support the strategy to allocate sites for housing and further appropriate contingency site(s) to be brought forward in relevant circumstances. However, the success of the strategy in meeting housing needs over the plan period relies on the delivery of the identified trajectory for individual sites and on the ability of the single contingency site at Costessey to be delivered quickly if circumstances require.

¹ The Inspectors may feel that this point should be more appropriately raised in matters, currently unknown, but relevant to a consideration of the individual site allocations in Part 2 of the examination process.



- 2.2 The evidence which underpins the implementation of this strategic matter is questionable, raising concerns about the effectiveness of the plan. The production of what the Partnership have titled Delivery Statements and Statements of Common Ground for individual sites since the submission of the plan and the earlier submission of Regulation 19 representations has done little to allay and, in fact, have only heightened these concerns. Particular concerns continue to relate to the delivery credentials of a number of key sites including GNLP0360/3053/R10 (East Norwich Strategic Regeneration Area), to be considered in Matter 8, GNLP0401 (former EEB site), GNLP0506 (adjacent Anglia Square) and GNLP0409BR (land at Barrack Street/Whitefriars). We anticipate that the Inspectors are likely to wish to consider representations made in relation to individual allocated sites later in the examination process. We have not, therefore, raised any of our detailed site-specific concerns here.
- 2.3 In addition, since the submission of the plan no further evidence has been presented to justify or explain the appropriateness and delivery trajectory of the contingency site at Costessey (GNLP2043/0581). We note that according to the evidence library a Statement of Common Ground is still being “negotiated”. We will wish to comment at an appropriate point in the examination on any further evidence and on the soundness of the Local Plan in relation to the selection of only the single contingency site GNLP2043/0581.