

EXAMINATION OF THE GREATER NORWICH LOCAL PLAN STATEMENT ON BEHALF OF TERRA STRATEGIC – ID 24244 LAND OFF BAWBURGH LANE, COSTESSEY

MATTER 1 - COMPLIANCE WITH STATUTORY PROCEDURES AND LEGAL MATTERS

This Statement is made on behalf of Terra Strategic in respect of Land off Bawburgh Lane, Costessey. Terra Strategic control the majority of the site, with the remainder controlled by Norwich City Council, who are supportive of the development proposal and have agreed for Terra Strategic to take the lead with promotion of the Site through the Local Plan process.

The site forms a contingency allocation within the draft GNLP Sites Document as part of Policy GNLP0581/2043. This contingency site allocation is identified on Submission Policies Map — South Norfolk for approximately 800 homes plus other infrastructure including a primary school and sixth form provision.

A Promotional Document is appended to our Matter 2 Statement, which sets out how the site responds its context, and how it could be developed within the Plan period.

ISSUE 2

Does the Sustainability Appraisal (SA) including the addendum, adequately assess the environmental, social and economic effects of the Plan in accordance with legal and national policy requirements?

- 1) Have the likely environmental, social, and economic effects of the Plan's policies and proposals been adequately assessed in the SA?
- 1.1 Yes. The SA has played an effective role in all stages of the Plan's preparation and the approach is justified and in accordance with national policy.
- 2) Has the Sustainability Appraisal, including the addendum, properly assessed the likely significant effects of all reasonable alternatives including a reduced housing provision buffer?



- 1.2 Yes. The SA has assessed reasonable alternatives, as set out in the Growth Options Document and associated Interim SA report. The four options in relation to housing requirements are set out at paragraph N21 of the SA¹.
- 3) Have all potential site allocations been assessed on a comparable basis?
- 1.3 Yes, the approach appears to be consistent.
- 4) Is it clear how the SA has influenced the Plan and the choice of spatial strategy?

 Does it support the spatial strategy or is there anything in the SA which indicates that changes should be made to the plan?
- 1.4 For the most part yes. However, SA Objective 10 - Education is not sound without further clarification² around the relationship between the capacity of existing secondary schools and the effect of new development on the objective to 'improve skills and education'. As set out in our response to Matter 5, there is a clear reliance on our site for the land required for the Local Education Authority to deliver a sixth form centre, which would (in turn) free up the required capacity at the Ormiston Victory Academy to deliver the necessary secondary school places, required by existing residential developments and proposed allocations in this Plan (see the SoCG with Norfolk County Council as LEA appended to our Matter 5 Statement). The spatial strategy does not include our site as a full allocation. Rather, it is identified as a contingency allocation. This means the LPA accepts that the site is agreed to be suitable, viable and available in principle (see SoCG with the LPA) but that there is uncertainty around the timing of when the site may be required. In turn, this creates uncertainty over whether the necessary land for the education places can be provided to support the growth within the Plan (including existing commitments). The implications of this should be assessed within the SA (especially as a reasonable alternative because this is the current policy of the Plan).
- 1.5 As set out in our response to Matter 3, we provide a suggested amendment to the wording of Policy 71 and Policy GNLP0581/2043 to address this issue. This would render this "unsound" Plan "sound" (following the proposed Main Modification).

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¹ Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan Volume 1 of 3 [A6.1]

² For instance at D.8.10 of Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan Volume 3 of 3 [A6.3]