

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

**MATTER 3 – STRATEGY FOR THE AREAS OF GROWTH**

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 1**

The Norwich Urban Area including the fringe parishes

**QUESTIONS**

**1) Is the approach set out in Policy 7.1 to focus development in the city centre, in strategic regeneration areas in East Norwich, the Northern City Centre and at strategic urban extensions and urban locations justified by the evidence and consistent with the overall vision, objectives and spatial strategy of the Plan? Is this strategy deliverable?**

1.1 Yes. We support the approach to direct 66% of housing to the Norwich Urban Area. It is noted however that our site is referenced at footnote 109 with the accompanying table of 7.1 confirming that it does not form part of the total deliverable housing commitments over the Plan period 2018-2038. We object specifically to this and the identification of our site as a

contingency site rather than full allocation, particularly given the nature of the triggers associated with the contingency allocation. As currently drafted, the Plan is not sound but can be made sound by a Main Modification making this site a full allocation.

- 1.2 The approach of including contingency or reserve sites is consistent with national policy, in the interests of ensuring sufficient flexibility to respond to changing circumstances and to under-delivery of allocations. The NPPF requires policies to have a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development (NPPF 23).
- 1.3 Reserve sites have been accepted in other Local Plans, including the recent North Warwickshire Local Plan<sup>1</sup>. The Stratford-on-Avon Core Strategy also included reserve sites to ensure the Plan represented 'a policy framework that is able to respond flexibly to changing circumstances'<sup>2</sup>. Both Plans were found to be sound. There is no dispute, therefore, that the principle of contingency sites can be "sound" and consistent with National Policy. Further, there is no dispute that (were the trigger to be activated) the site would be deliverable within 5 years.
- 1.4 However, it is our view that the approach to the contingency site in the GNLP will be ineffective and unsound. This is due to the nature of the trigger, which relies on three consecutive years of 15% under-delivery against the Housing Delivery Test. This is inconsistent with the NPPF, which requires the housing requirement to be met *as a minimum* (NPPF 60 and 61) and for remedial action to be taken should the HDT indicate that delivery has fallen below 95% (NPPF 76). There is no evidential or policy basis for a less rigorous trigger to be imposed in respect of this site. Further, the proposed draft trigger is reactive and inflexible in responding to issues with housing supply. As set out in our response to Matter 2, this will conflict with the Vision and Objectives of the Plan and is likely to lead to unplanned, speculative development in response to a lack of five year housing supply and failure to meet the HDT. For example, should the LPA be unable to demonstrate a 5YHLS, the tilted balance (NPPF 11(d)i) is engaged but the contingency trigger is not. This would promote speculative applications on sites which are *less* sustainable than this site. This is perverse and unsound. Finally, the Housing Delivery Test does not take into account under-delivery of affordable housing. Should there be a failure to deliver minimum levels of affordable housing (which itself fails to meet affordable housing needs adequately), there should be remedial action and the contingency site should be triggered.

<sup>1</sup> [Report on the Examination of the North Warwickshire Local Plan](#) (July 2021)

<sup>2</sup> [Stratford-on-Avon Core Strategy, Inspector's Report](#) (June 2016), paragraph 13

1.5 In the 2016 Local Plan Experts Group Report, one of the recommendations to maintain housing land supply was around reserve sites:

**“ii. Local Plans should make a further allowance; equivalent to 20% of their housing requirement, in developable reserve sites as far as is consistent with the policies set out in this Framework, for a minimum fifteen year period from the date of plan adoption, including the first five years (this recommendation does not apply where it has been demonstrated that a local authority does not have sufficient environmental capacity to exceed its local plan requirement). The purpose of reserve sites is to provide extra flexibility to respond to change (for example, to address unmet needs) and/or to help address any actions required as a result of the Government’s proposed housing delivery test.**

**iii. Local Plans should contain a policy mechanism for the release of reserve sites in the event that monitoring concludes that there is less than 5 years housing land supply or there is a need to address unmet needs”<sup>3</sup>**

1.6 Whilst the recommendations were not reflected in the latest NPPF, it is clear what the purpose of reserve sites are and the role they can and should play in supporting the objective to significantly boost the delivery of housing and maintain an effective supply over the Plan period.

1.7 For the GNLP, even if the Council were to rely on the Housing Delivery Test as a trigger, at the very least this should be revised to ensure it reflects NPPF paragraph 76, i.e. that a 95% Housing Delivery Test requires an action plan to identify actions to increase delivery in future years. At the end of this response we have suggested revised wording for Policy GNLP0581/2043 on this basis, as well as reference to other triggers (including around under-delivery of affordable housing), in the interests of addressing the issues of soundness with the Plan.

1.8 As well as fulfilling the purpose of reserve sites in providing flexibility, this will help the Plan in being responsive against potential difficulties on some of the larger sites, including Anglia

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<sup>3</sup> [Local Plans Expert Group Report to the Communities Secretary and to the Minister of Housing and Planning](#) (March 2016), paragraph 41

Square and East Norwich. Whilst we support the allocations, they have very distinct challenges which may impact deliverability of housing in the earlier years of the Plan, and affordable housing generally. In our response to Matter 2 we outline the difficulties and potential risks for further reductions in the capacity of East Norwich and the knock-on effects this may have for affordable housing provision.

- 1.9 Further or alternatively, in order to be consistent with the Vision and Objectives of the Plan, as noted in our response to Matter 2, Policy 7.1 needs to refer to suitable education provision to support the growth within the urban area including the fringe parishes. Of particular importance is the required sixth form on our site (see the SoCG with the LEA). If land is not made available to facilitate the relocation of the sixth form on the site, given there is no alternative, this will result in a lack of secondary school provision to meet existing and planned housing development. The Plan will be irrationally inconsistent and will clearly fail to be sound (NPPF 35). We detail this response in our Matter 5 Statement. We consider this issue to be so fundamental to the soundness of the Plan and the entire growth strategy that we think the site should be a full allocation. If (contrary to all the evidence) it is not, it must be subject to revised triggers (set out below).

*Suggested change*

- 1.10 To help mitigate the risks around housing supply and to ensure a lack of school places does not undermine the growth strategy, the table at Policy 7.1 should be amended to reference the delivery of at least 800 additional dwellings at Costessey. If the site is to remain a contingency site, at the very least the triggers should be amended to ensure the Plan is sound. Our suggested wording for Policy GNLP0581/2043 is as follows:

**“The site will become an allocation for development if any of the following apply at any point in the Plan period:**

- a) the Council’s Housing Delivery Test shows that delivery has fallen below 95% in the previous year; or**
- b) if annual monitoring data indicates that forecast land supply falls lower than 5.5 years<sup>4</sup>; or**
- c) net affordable housing delivery (as a percentage of overall housing delivery) falls below 28% over a period of two consecutive years; or**

<sup>4</sup> As per the approach to Reserve Housing Sites in the [adopted North Warwickshire Local Plan](#), Policy LP38 / page 80

~~there are three consecutive years in which Annual Monitoring Reports show that housing completions in Greater Norwich are more than 15% below annual targets in each year and where under delivery is the result of site specific constraints (for example there are infrastructure or ownership constraints or significant abnormal costs have been identified) preventing the delivery of committed and allocated housing sites."~~

**2) Does Policy 7.1 support the city centre's role as a key driver of the Greater Norwich economy and is it consistent with national policies for ensuring the vitality of town centres?**

2.1 We have no specific comments to make.

**3) Do the sites listed in the East Norwich section of Policy 7.1 on page 106 of the Plan, form part of the East Norwich Strategic Regeneration Area as defined on the proposals map, other allocations on the proposals map, or potential sites for future development? For example is 'Land East of Norwich City FC' site reference CC16 in the Plan?**

3.1 We have no specific comments to make.

**4) Do sections 1-3 of Policy 7.1 need to be modified in order to reflect the recent introduction of Class E within the Use Classes Order? Are these sections consistent with national policy?**

4.1 We have no specific comments to make.

**5) Does Policy 7.1 need to be modified to replace references to primary and secondary retail frontages with 'Primary Shopping Areas'?**

5.1 We have no specific comments to make.

**6) Do the site-specific requirements in Policy 7.1 relating to the East Norwich Strategic Regeneration Area duplicate those set out in Policy GNLP0360/3053/R10?**

6.1 We have no specific comments to make.