



Greater Norwich Local Plan Examination – Matter 3 Statement: Strategy for the Areas of Growth

Date: January 2022

For: Rosconn Strategic Land

Issue 2: The Main Towns

Q2. Is Policy 7.2 otherwise justified, effective, and consistent with national policy?

No. For the reasons set out in our Matter 2 Statement we consider that the strategic apportionment of housing to the Main Towns is too low and inconsistent with their position in the settlement hierarchy.

Long Stratton is the only Main Town that has been excluded from accommodating net growth through the Plan because of the scale of the existing commitment at the settlement which has yet to be consented despite having been originally allocated in 2016 through the Long Stratton Area Action Plan (LSAAP). However, the scale of the commitment in Long Stratton (1,800) is no greater than Wymondham (also a Main Town). There are a number of other locations throughout the plan area where additional growth has been directed to supplement substantial existing commitments some of which have either yet to commence delivery or are at the very early stages of delivery (e.g. Growth Triangle). The reason for the inconsistency is not clear from the Plan or its evidence base and is therefore unjustified.

Paragraphs 365 and 366 of the supporting text to Policy 7.2 state that the LSAAP will not be replaced by the Greater Norwich Local Plan (GNLP) and that LSAAP may be reviewed separately to address the delivery of additional housing in Long Stratton, if required. If additional new housing is required at Long Stratton it should be allocated through the GNLP. Allocating additional land via a review to the LSAAP will not be possible without undermining the GNLP's stated spatial strategy, as Policy 7.2 is clear that the strategic apportionment of new homes to Long Stratton is nil. If it is the intention to bring forward further homes in Long Stratton within the GNLP plan period then this should be considered through the GNLP.

By the time of the GNLP's anticipated adoption (September 2022) the LSAAP will have less than four years left to run before it becomes time-expired and possibly less should the examination of the GNLP become prolonged. The formulation of the GNLP has not included a review of the LSAAP despite the inclusion Long Stratton as part of the plan area and despite the fact that the LSAAP will remain a subservient plan to the JCS, which will be superseded on adoption of the GNLP. This approach is neither effective nor justified.

Whilst the growth allocated in the LSAAP is treated as a commitment within the GNLP and its evidence base, no planning permissions have been granted despite two applications having been submitted for the full balance of the allocation in January 2018. Rosconn provided comments on the deliverability of the LSAAP allocation in its Regulation 19 representations and we note the Partnership's response from mid-2021 that the planning applications for the area have "good prospects for a favourable determination in 2021." At the time of writing in January 2022 both applications are still pending determination with a number of objections most notably from Norfolk County Council as the Local Highway Authority. There is no clear path to approval and a number of sources suggest that the existing planning applications will be re-submitted. This does not appear to have occurred.

Given that the LSAAP allocation is largely dependent on the delivery of new bypass which is not due to commence construction until mid-2023 at the latest, the lack of progress with the



planning applications is a concern. The GNLP anticipates that a significant portion of the allocation will not deliver before the end of the plan period and depending on length of time it takes for the bypass to be completed, Long Stratton will likely not be able to grow to meet short to medium term housing and other development needs. For example, we note from recent correspondence on the planning register that the two applications currently under consideration will not deliver a policy-compliant level of affordable housing and a viability appraisal is currently being undertaken to assess the extent of under-provision. As set out at paragraph 2.18 of our Regulation 19 representations, Greater Norwich suffers from an acute shortfall of affordable homes against JCS targets accumulated since the start of the plan period. The effects of this under-provision are likely to be felt more strongly in Long Stratton given the lack of alternative sites identified for development within the JCS plan period, an approach that will be carried forward into the GNLP thereby exacerbating the problem of affordable housing delivery.

Rosconn considers that Policy 7.2 should apportion growth to Long Stratton to deliver housing and other needs to 2038 rather than dealing with this through a review to the LSAAP. As part of this exercise, we consider it necessary to review the LSAAP through the GNLP to assess whether it remains justified and effective when considered against all the evidence and the reasonable alternative sites.