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

MATTER 4 – SUSTAINABLE COMMUNITIES AND THE ENVIRONMENT

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 to its context, and how it could be developed within the Plan period.

ISSUE 1

Is Policy 2 justified, effective and consistent with national policy?

QUESTIONS

1) Is Policy 2 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals?

1.1 Policy 2 provides a range of guidance for which development proposals will be required to achieve. This includes achieving a minimum net density of 25 dwellings per hectare, as well as setting out the aspirations for energy reduction. A planning application would also need to be supported by a Sustainability Statement as well as a Delivery Plan. We consider the policy strikes the right balance, to allow the decision-maker to assess each application based on its context. This is necessary across such a large and varied Plan area.

2) Is the term 'as appropriate' sufficiently clear as to what kind and scale of development proposals Policy 2 would apply to? P62 of the Plan indicates that the policy would apply to minor developments. Is this all minor developments? If not, which ones would it apply to?

1.2 We have no specific comments to make.

3) Does Policy 2 apply to all applications or only those that fall within the thresholds identified within sections i-iv of the Policy?

1.3 We have no specific comments to make.

4) Are the indicative minimum residential densities of 25 per hectare in the Plan area and 40 per hectare in Norwich justified and deliverable? Are they supported by the requirements on individual site allocations? Is it effective to describe minimum net densities as 'indicative' and does this imply that they are optional?

1.4 Numerous site-specific policies within the GNLP Pre-Submission Draft Sites Plan [A2] make reference to densities where relevant. Both these allocations and Policy 2 allow for a less prescriptive approach to design and site delivery. This is effective, providing there is a sufficient policy mechanism to resist development which does not make efficient use of land. Policy 2, criteria 4 achieves this.

5) Is it clear what purposes Strategic Gaps are intended to serve and how development proposals within them will be assessed?

1.5 We have no specific comments to make.

6) Is the proposed modification to Table 8 (in response to comments made by Natural England) justified? In order to be effective, should this be moved to the policy wording itself?

1.6 We have no specific comments to make.

7) Is it justified to require housing development to meet the higher optional standard for water efficiency, and non-residential development to meet the BREEAM “Very Good” water efficiency standard, or any equivalent successor?

1.7 We do not object to the requirement regarding residential, providing it is supported by viability evidence. We understand that higher standards were included as part of the Joint Core Strategy due to existing issues around water supply. Reference is made to ‘Policy – water’ in the assessment of typologies in the latest May 2021 Viability Study [B26.5], but clarification is required to confirm this specific requirement has been tested and is viable.

8) Is it justified for Policy 2 to refer to a future optional water efficiency standard when any such standard, and the conditions for its adoption, are currently unknown?

1.8 It would be difficult to justify unless it has been tested as deliverable through a viability assessment. It may be more appropriate to address through a Local Plan Review.

9) Is it justified for Policy 2 to require new development to provide a 19% reduction against Part L of the 2013 Building Regulations? The policy states that it will apply to “all new development” – is this justified?

1.9 We do not object to the requirement providing it is supported by viability evidence. Reference is made to ‘Policy – energy’ in the assessment of typologies in the latest May 2021 Viability Study [B26.5], but clarification is required to confirm this specific requirement has been tested and is viable.

10) Is it justified for Policy 2 to require ‘appropriate’ non-housing development of more than 500 square metres to meet the BREEAM “Very Good” energy efficiency standard, or any equivalent successor? How will it be determined whether a proposal is ‘appropriate’ in this regard?

1.10 We have no specific comments to make.

11) The explanatory text states that master planning using a community engagement process will be required on sites for more than 500 dwellings or 50,000 square metres. However, the policy wording does not refer to this requirement. The policy

wording does however refer to master planning being encouraged on larger sites and particularly for proposed developments of 200 dwellings or 20,000 square metres plus. Should the policy be modified to address this inconsistency? Does the policy need to be made clearer in this regard to be effective?

1.11 Yes, the requirement should be made clearer.

12) Is it clear what form any master planning and community engagement is expected to take? Has any such requirement been considered in the assumed lead-in times for the delivery of larger sites?

1.12 No. Whilst we support the principle, clarity is required to avoid any misinterpretation and delay.

13) Is the requirement for developments of more than 100 dwellings to be accompanied by a delivery statement justified and effective? How would this work in situations where planning permission is secured in outline, or with the intention of disposing the land to a developer?

1.13 Yes, the requirement is supportable in principle but clarity is required.

14) Is Policy 2 and the Plan in general, consistent with the provisions of the National Planning Policy Framework in respect of climate change?

1.14 Yes, subject to viability being demonstrated.

15) Have all of the proposed requirements in Policy 2 been subject to viability testing?

1.15 As above, this is currently unclear.