

Greater Norwich Local Plan (GNLP) Examination
Hearing Further Statement Matter 4: Sustainable Communities and the
Environment
Issue 1 – Is Policy 2 justified, effective and consistent with national policy?

Prepared on behalf of Weston Homes Plc and Columbia Threadneedle
Investments
14 January 2022

Introduction

- 1 This Further Statement has been prepared on behalf of Weston Homes Plc (WH), who have a 'subject to planning' contract to purchase the site of Anglia Square Shopping Centre and surrounding vacant land from Columbia Threadneedle Investments (CTI), the current owners.

The Inspectors' Questions

1. The text below addresses the following questions raised by the Inspectors to the GNLP Reg 19 Hearings:
 1. *Is Policy 2 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals ?*
 2. Generally the policy is clear enough for an applicant to understand what requirements it places on any scheme, other than '*as appropriate*', which is addressed in the Inspectors' Question 2.
 2. *Is the term 'as appropriate' sufficiently clear as to what kind and scale of development proposals Policy 2 would apply to?*
 3. Our interpretation of "*To achieve this, development proposals are required, as appropriate, to:*" is that the applicant and decision maker should be able to decide from the circumstances of the scheme whether any specific criterion listed in the policy is relevant to the characteristics of any proposal, no matter the type or scale. For example, there is no need to demonstrate compliance with Criterion 9 in respect of non-housing development water efficiency standards if there is no non-housing development with a water supply. It is

not setting a trigger of scale of development to which the criteria apply, and accordingly WH does not consider that the policy needs amendment in this regard.

- 4 *Are the indicative minimum residential densities of 25 per ha in the Plan area and 40 per ha 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 they are optional?*
- 5 The reference to “dependent on site characteristics, with higher densities ... in the most sustainably accessible locations in Norwich”, together with Footnote 77 makes clear that these are not the expected densities in sustainable locations, but equally that they are not optional in the sense that lower densities would be just as acceptable. Whilst the principle of minimum densities is supported by NPPF 125 'a', there is nevertheless no explanation in the supporting text to Policy 2 in Table 8, or in footnotes, as to how those particular minima have been determined, and thus, they are not clearly justified. In respect of GNLP 0506 Anglia Square, the minimum of 40 dwellings per ha for Norwich is far below even the proposed allocation of “in the region of 800 dwellings” (c.175 dwellings per ha), which WH is in any event challenging as too inflexible to allow for a higher figure where demonstrated to satisfy site constraints. Therefore WH consider that the minimum density of 40 dwellings per ha for Norwich is not “supported” by the site allocation in that instance.
- 6 The proposed policy also introduces a requirement for “car free housing” in the most sustainably accessible locations in Norwich, in Criterion 4, which is not referenced in Table 8, whilst additionally the term “most sustainably accessible locations in Norwich” is not defined, nor are these areas shown on a plan. It is noted that the NPPF does not impose a ban on residential parking provision in city centres, and thus a more flexible approach should be taken. A reflection of market considerations in ensuring that dwellings remain of interest to the market and meet the needs of particular population groups would be a more appropriate approach. Any area in Norwich within which residential car parking is proposed to be banned would need to be defined on a plan and demonstrated to ensure it retains scheme viability and thus deliverability, or otherwise allow those as potential reasons for exceptions to the policy.

Recommended policy changes

- 7 WH set out below in red recommended changes to Policy 2 Criteria 4 to ensure that it is justified, effective and clear:

4 Make efficient use of land with densities dependent on site characteristics, with higher densities ~~and car free housing in the most sustainably accessible locations~~ in Norwich reflecting, inter alia, the sustainability of the location and the residential car parking ratio that can be justified within a scale, that balances the benefits of car free homes against the need to ensure that homes are attractive to occupiers and thus provide an adequate return to secure scheme delivery, and meet the needs of different population groups including disabled persons. Indicative minimum net densities are 25 dwellings per hectare across the plan area and 40 in Norwich, ~~except where the Site Allocations indicate a higher number of dwellings on an allocated site would be anticipated to satisfy all relevant Plan policies.~~