

HEARING STATEMENT FOR

GREATER NORWICH LOCAL PLAN EXAMINATION (PART 2)

MATTER 12

ON BEHALF OF BARRATT DAVID WILSON HOMES (EASTERN COUNTIES)

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) PLANNING AND COMPULSORY PURCHASE ACT 2004

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Matter 12 - Housing and mixed use allocations – sites with extant planning permission**Land north of the A11, Cringleford (Ref GNLP0307/GNLP0327)
Is the proposed site allocation (o) soundly based? In particular:****Q.1. Does the site still benefit from an extant planning permission for housing development?**

The proposed Policy GNLP0307/GNLP0327 will result in the uplift of the Cringleford Neighbourhood Plan allocation (HOU1) from approximately 1,200 homes to approximately 1,710 homes. It is therefore based on an allocation that has previously been the subject of an examination process and found to be sound. Albeit at a lower number of homes. Our client has secured outline planning permission (ref. 2013/1793) with reserved matters approvals for the internal spine road (ref. 2013/1793) and all 650 of the homes (ref. 2013/2200) for the northern part of their Newfound Farm site. These applications are all extant and the site is presently being built out. A Section 73 application (ref. 2021/2783) has recently been submitted to amend 101 of the house types so part of the site can be built out by another housebuilder. Once approved, this amendment will result in a faster delivery of new homes from the site as well as giving purchasers a greater choice of products.

The approved layout has been designed to provide the necessary vehicular connectivity with the southern section of site ref. GNLP0307, which our client controls. The adjacent site (ref. GNLP0327), which also forms part of the allocation and proposed uplift area, is not controlled by our client, and does not benefit from any planning consent. Moreover, no applications have been submitted for the development of the adjacent land either in isolation or as part of wider development proposals.

Q.2. Are the site specific delivery assumptions justified?

The Neighbourhood Plan covers the period from 2013 to 2026 and includes an allocation to accommodate approximately 1,200 homes. The use of the word 'approximately' means that the 1,200 figure is not a maximum and planning permissions have already been granted for over 1,300 homes. The Greater Norwich Local Plan contains the planning strategy for growth in Greater Norwich from 2018 to 2038. Therefore, it is appropriate

that the Local Plan assesses the number of additional homes that can be accommodated within the remaining land of the Cringleford allocation over the longer plan period. As part of the earlier phases of the Local Plan process our client has provided evidence to demonstrate that it is technically achievable to accommodate an uplift in the number of homes across the allocation. This work has focused primarily on their land to the south of the Newfound Farm site, which, together with site ref. GNLP0327, are the only land parcels of the allocation without planning consents. As a result of this work our client recommends that the number of homes identified for the balance of their land be approximately 500 homes and that the figure of approximately 1,710 homes in the draft policy be increased to 'at least' 1,800 homes.

Whilst the assumption that the remaining part of the allocation can deliver 410 additional homes is justified our client has carried out a detailed masterplanning exercise that confirms a greater potential capacity for the remaining part of site ref. GNLP0307. This robust masterplanning work informed the Framework Plan and '*Cringleford: Phase Two Vision Document*' that were submitted as part of the Regulation 18 consultation. These confirm that the balance of site ref. GNLP0307 alone could accommodate approximately 500 homes. The methodology used by the Partnership to arrive at the uplift figure is unclear. However, they must have carried out a further assessment following the Regulation 18 consultation. As the capacity of the uplift area was subsequently increased from 360 to 410 homes.

The Framework Plan demonstrates how a residential development of 500 homes and an extension of the school site could be accommodated alongside a substantial landscaped buffer between the residential land and the A47 southern bypass. Accordingly, the 500 homes uplift proposed by our client would result in development that broadly follows the development boundary of the village and is within the Housing Site Allocation Area as shown on the Proposals Map of the Neighbourhood Plan. Moreover, the masterplanning exercise took into account specific constraints such as noise from the A47 southern bypass and the electricity pylons that cross the site.

The capacity work carried out to inform the Framework Plan was based on applying a similar density to the approved scheme to the north of the Newfound Farm site. Given that the phase 2 land will form the edge of the settlement a slightly lower overall density was applied. This is to ensure that a more organic, low-density layout can be delivered to the

south of the site as the residential area meets the landscaped amenity area buffer adjacent to the A47 southern bypass. Whilst the final density and numbers that can be delivered should be based upon a design-led approach, it is important to highlight that draft Policy 4 requires developments to deliver a minimum net density of 25dph. If the uplift figure were to be treated as a maximum for the land across both site GNLP0307 and site GNLP0327 then it would not comply with the minimum net density required by draft Policy 4. Moreover, it would not be consistent with paragraphs 124 and 125 of the NPPF that require planning policies to ensure the efficient use of land and identify the importance of avoiding homes being built at low densities, especially in sustainable locations.

The further assessment of the capacity of the allocation following the Regulation 18 consultation should have been made public to justify the additional uplift. There should also have been an explanation as to why the uplift was not higher based on our client's evidence and why the draft policy was not amended accordingly.

Q.3. Are the detailed policy requirements that would apply to the allocation justified and effective?

As part of the preparation for an application on phase 2 of the Newfound Farm site our client has carried out additional transport assessment work. This work confirms that the approved accesses onto Colney Lane can accommodate the additional traffic flows from phase 2. Whilst our client will work with the neighbouring developer to achieve a route through the adjacent development site (ref. 2013/1494) capable of serving as a bus route, it is unreasonable for Policy GNLP0307/GNLP0327 to require this link. This is something that is outside our client's control and making it a policy requirement could prejudice their site coming forward for development. In accordance with the wording of the draft Policy, the capacity of the existing site accesses to accommodate further traffic flows will be confirmed through the submission of a Transport Assessment as part of the planning application for phase 2.

Whilst less of a concern to our client, the inclusion of matters that would be covered by other policies of the Local Plan and national planning policy, such as the provision of SuDs and the requirement to consult the Historic Environment Record, are unnecessary. It is recommended that in addition to removing the requirement to provide a link capable of serving as a bus route through the adjacent site Policy GNLP0307/GNLP0327 should also

be amended so that it does not duplicate other policies of the Local Plan or national planning requirements.

Q.4. Is any proposed uplift in capacity, or extension to the site, justified and supported by the evidence?

The Neighbourhood Plan originally took a flexible approach to development with the use of the word 'approximately'. Therefore, it is appropriate that the original figure of 1,200 homes was not seen as a constraint to development. Now that development sites have been approved and detailed applications submitted there is a greater understanding of the capacity of the remaining sites than would have been possible when the Neighbourhood Plan was being prepared. Based on the known constraints of the remaining land of site ref. GNLP0307 and an assessment of the densities that have been considered appropriate elsewhere in the village, a more precise number of the uplift in homes to accommodate the future growth needs of the Greater Norwich area is not only justified it is essential.

There is no detailed evidence provided by the Partnership as to how they reached the proposed uplift figure for the allocation. In contrast, our client's submissions to earlier stages of the Local Plan process have provided robust assessments of the capacity of their land. The limited size of the site ref. GNLP0327 and the need to provide a buffer to the A47 southern bypass means that its development potential is more limited. However, the uplift policy still needs to cater for some development on this adjacent land. It is therefore appropriate that a more accurate figure be provided for the uplift policy, and that flexibility be applied to the final numbers that can be delivered across both the remaining land parcels. This will make the most efficient use of land and boost the supply of new homes in accordance with Policy 2 and paragraphs 60 and 119 of the NPPF.

Cringleford Parish Council is clearly a forward-thinking Parish Council that has embraced growth. However, our client recognises that the increasing numbers of homes permitted and proposed above the original figure of 1,200 is being questioned by residents. There is a risk that without caveating that the figure of new homes delivered under the uplift policy, which our client recommends be increased to 'at least' 1,800, could be higher than residents and the Parish Council may regard it as a maximum figure. To ensure that the plan is positively prepared and is consistent with achieving sustainable development a design-led approach should be adopted to the uplift in the allocation. Alongside clarifying

how the final numbers have been assessed, which we recommend is based on the evidence submitted at the Regulation 18 stage, the figure of the uplift should increase to 1,800 homes. Policy GNLP0307/GNLP0327 must also clarify that this figure is a minimum.