

Matter 14

Issue 2: Open space/leisure allocations

Q1: Is the allocation justified and is it supported by the evidence?

- 1.1 We have little to add to the representations made at the time of the Regulation 19 submissions. The Inspectors will be fully aware of our client's case concerning the lack of up-to-date evidence to justify the carry forward of this allocation from the 2016 plan. The policies of local plans must be justified in order for the plan to be sound. The policies cannot be justified by simply relying on evidence, in this case, used to justify an allocation in a plan adopted six years ago (2016) based on evidence itself dated eight years ago (2014). Our Reg 19 representations highlight the Partnership's own admission that the evidence used to justify the allocation in the 2016 plan is now considered to be out of date and, in the word of the Partnership's consultants "obsolete".
- 1.2 We have noted the response from John Walchester during the Matter 1 Issue 1 session where he stated *"We have had regard to various information in preparing policies 2 and 3 of the GNLP"* We are not clear what information the Partnership has had regard to in relation to allocation HEL4/GNLP1019.
- 1.3 Mr Walchester also stated at the same session *"In terms of more formal open space that hasn't been taken forward specifically in the GNLP because there are already policy requirements in the existing development management local plans which are not going to be superseded by the GNLP."* If this is the case, then why does the plan seek to allocate 11.9 hectares of my client's currently productive farmland for recreational open space?
- 1.4 Mr Walchester also suggested that the still emerging Greater Norwich Sports Facility Strategy to which I refer to in the Reg 19 submissions is *"relevant primarily to decisions by the GNDP in guiding decisions on infrastructure and investment primarily using CIL monies."* This may be the case but it, together with the preliminary GNDP reporting on the document (referenced in paragraphs 4.1 to 4.16 of CODE's Reg 19 representations), appears to be the only clue and reference we have to the consideration of recreational open space of the kind allocated under HEL4/GNLP1019. The Infrastructure Needs Report (INR) submitted as part of the evidence base to the GNLP (Doc B12.2) makes clear reference on page 40 to *"awaiting findings of the Greater Norwich Sports Facility Strategy"*. In the introduction to the INR we are informed

"The emerging Greater Norwich Local Plan (GNLP) will be the planning strategy and site allocation plan to provide for growth from 2018 to 2038 in the three districts of Broadland, Norwich and South Norfolk. The districts are working in partnership to produce the GNLP, along with Norfolk County Council and the Broads Authority, through the Greater Norwich Development Partnership."
- 1.5 With respect, the only conclusion the Inspectors can draw from this is that reliance on documents used to justify an allocation of land in 2016 and which the GNDP themselves admit should be part of the evidence base but are out of date and currently being reviewed does not provide justification for the current allocation of 11.9 hectares of land sufficient to satisfy the tests of NPPF paragraph 35.
- 1.6 The reliance on a carried forward allocation without justification appears also to have prevented the GNDP from considering other possible alternative sites and forms of recreational open space even if there were a need.



2 **Recommended remedy**

- 2.1 We recommend that in the absence of any justification for the allocation of land for public recreational open space and the suitability of allocation HEL4/GNLP1019 when considered against other reasonable alternatives, the allocation HEL4/GNLP1019 should be deleted.