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

**MATTER 9 – RESIDENTIAL BASED ALLOCATIONS – NEW SITES WITHOUT PLANNING
PERMISSION THAT ARE ALLOCATED FOR MORE THAN 500 DWELLINGS**

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

ISSUE 4

Costessey Contingency Site (Ref GNLP0581/2043)

QUESTIONS

Is the proposed site allocation soundly based? In particular:

1) Is the allocation justified and is it supported by the evidence?

1.1 Yes, we think the allocation is justified and supported by the evidence. The proposal is acceptable in principle for residential and education development. The site is suitable, viable and available in the Plan period. Indeed, it is deliverable in the short term. The principle of the policy is therefore considered to be sound and supported by the evidence. However, as currently drafted the policy is unsound and inconsistent with the evidence base. The policy can

be made sound by the full allocation of the site or (if the site must remain as a contingency site) amendment to the proposed triggers so that they are fit for purpose and sound.

- 1.2 Starting with the principle of Costessey as a location for growth, there is clear evidence to support this as a sustainable location for growth in the Plan period, given its location in the Norwich Urban Area. This is dealt with under earlier Matters. A summary of the area's sustainability is set out in the Topic Papers¹, including its role in helping to deliver low carbon growth throughout the plan period². The Costessey Booklet [B1.4] provides additional support, with an overview of the '*wide range*' of services and facilities as well as '*regular peak hour bus services into Norwich*' (page 1).
- 1.3 In terms of the site itself, assessments as part of the HELAA process are summarised in page 5 of the Costessey Booklet – our site comprising GNLP0581 and GNLP2043, with no 'Red' or negative scores against any category. The Sustainability Appraisal [A6.3] has also assessed GNLP0581, noting at the pre-mitigation stage 3 three Major Negative effects (page E4) and post-mitigation no Major Negative effects (page E32); with the GNLP policies applied it scores four Major Positive effects (page F259). The Costessey Booklet reflects on this assessment process and considers that the negative issues raised:

'could be overcome through policy mitigations such as adequate landscaping and the need to safeguard land within the site for a school.'³

- 1.4 The SA concludes:

'Sites GNLP0581 and GNLP2043 are considered together as a contingency site for 800 dwellings should this prove to be required due to the low delivery of sites. The site is well located on the edge of Norwich in close proximity to the A47 Longwater Interchange and services and facilities in Costessey and at Longwater.'⁴

- 1.5 Reasonable alternatives to the contingency site were considered, as per paragraph 98 of the Policy 7.1 Topic Paper [D3.9], and an assessment of why other Urban Fringe sites were

¹ For example, Topic Paper: Policy 7.1: The Norwich urban area including the fringe parishes [D3.9], page 4

² Topic Paper: Policy 1 Growth Strategy [D3.1], paragraph 28

³ Costessey Booklet [B1.4], page 52

⁴ Sustainability Appraisal Volume 3 [A6.3], page G7

dismissed are summarised at Table 2 / page 104 of the same document, as well as throughout the Costessey Booklet [B1.4].

- 1.6 In our view, the evidence therefore comprehensively supports allocation of the site given it is available, developable and suitable. No significant constraints have been identified and we are unaware of any specific issues around infrastructure requirements or anything else which would necessitate delivery of this site later in the Plan period. The principle of development is acceptable and there is no reason to delay the development of this site.
- 1.7 As such, there is no reasonable evidence base for the site being a contingency allocation instead of a full allocation. The assessments speak about its role as a site to assist with under-delivery of other allocations, which alongside the proposed buffer, will assist in providing flexibility over the Plan period⁵. The Costessey Booklet appears to offer some additional reasoning for the contingency allocation at page 29:

‘Sites GNLP0581 and GNLP2043 are included as contingency sites in the draft plan for up to 1000 dwellings should this prove to be required due to low delivery of allocated housing sites. They are currently not preferred due to landscape impacts and questions over their deliverability. Site GNLP0593 would entail the loss of employment land, but is considered to be a reasonable alternative.’

- 1.8 This does not appear to be mentioned elsewhere, including in the Partnership’s response to the Inspectors’ Initial Questions, which further confirms the sustainability and suitability of the site⁶. Landscape impacts are not considered to be significant in the GNLP’s assessments (as concluded at paragraph 1.4 above), so it is unclear where this point comes from, but for completeness we feel it should be addressed. We have produced a Promotional Document (appended to our response to Matter 2 Issue 1) which assesses landscape character, with recommendations that have informed the initial concept layout. As shown, a suitable landscape buffer can be provided to the west and south, and alongside the retention of the Beech Plantation woodland in the centre of the site, 800 dwellings can be delivered in a sensitive manner alongside all other requirements including land for education. Similar landscape discussions arose for the site to the north, allocated through Policy COS 1 of the South Norfolk

⁵ Topic Paper: Policy 1 Growth Strategy [D3.1], paragraph 117

⁶ D1.3, page 18

Local Plan for 500 dwellings⁷. Landscape evidence in November 2012 recommended removing the site to the north from the Norwich Southern Bypass Landscape Protection Zone:

'The review undertaken by CBA has concluded that for the most part the boundaries of the NSBLPZ continue to be robust and justifiable for inclusion within the Development Management Policies Document. The exception to this is where the existing character of land within the NSBLPZ can no longer be considered to be rural; namely the Royal Norfolk Showground and where future development sites within the NSBLPZ have been identified as preferred options for strategic allocations within the South Norfolk Local Plan. In addition, the land within the NSBLPZ, but outwith strategic allocations, between Easton and Costessey has a limited contribution to the protection of the landscape setting of the southern bypass and the urban area. The review has therefore concluded that the boundary of the proposed north western extent of the NSBLPZ be redrawn along Long Lane as shown on Figure 6.1.'⁸

- 1.9 We are not aware of any GNLP landscape evidence that identifies the contingency site as particularly sensitive or incapable of mitigation. It is well related to existing built form and given the lack of any consistent reference to any unique landscape harm (besides that in the Costessey Booklet), we do not agree that this is a justification for this site not being a full allocation. By way of example, another allocation at Land west of Ipswich Road, Keswick identifies a similar 'negative' effect in respect of landscape, specifically the '*setting of the site within the Southern Bypass Landscape Protection Zone*'⁹. However this does not necessitate a contingency policy for KES 2, only a requirement for appropriate layout, scale and landscaping. Mitigation is therefore possible (as acknowledged for heritage matters, as set out in paragraph 9.1 of B10.10).
- 1.10 In terms of questions over deliverability, we are unclear as to what the specific issue or concern is here given the HELAA comparison table at page 5 of the Costessey Booklet does not raise any issues. From previous discussions with the Partnership we assume this is in relation to the

⁷ South Norfolk Local Plan 2015: Site Specific Allocations & Policies Document, page 45

⁸ [South Norfolk Local Landscape Designations Review: Norwich Southern Bypass Landscape Protection Zone](#) (November 2012), paragraph 6.1

⁹ Sustainability Appraisal Volume 3 [A6.3], page F268

southern access. We consider issues around this have been addressed; see our response to Question 3 below.

1.11 Our position is therefore that the site is accessible, sustainable, free of significant constraint and deliverable. As we have raised previously it would help to address the following issues:

- The affordable housing need of 670 dwellings per annum is significantly above historic delivery rates of 445 affordable dwellings per annum averaged over 2011-21. Going forward, we have concerns that affordable housing delivery will be challenging on a number of strategic sites, including East Norwich, which will exacerbate this issue.
- The Statement of Common Ground with the Education Authority appended to our Matter 5 Statement confirms that the further expansion of secondary education provision at Ormiston Victory Academy will not be feasible unless the existing sixth form provision at the Academy is relocated to another local site, hence the policy requirement. Following further discussion with the Education Authority it has been clarified that the current expansion of the Ormiston Vision Academy would meet the secondary education needs of previously consented development only. Any additional growth in the future may require further expansion of the Academy. This growth could for example include allocations in the GNLP, or relevant sites that may come forward under the South Norfolk Local Village Clusters Housing Allocations Local Plan. The extent of growth which would necessitate a further expansion of the Academy is not currently known, however it is still accepted that this expansion would likely require the loss of the sixth form, and its replacement elsewhere. The only potential site (so far as we are aware) is this contingency site. In the event that the contingency site is not allocated, further expansion at Ormiston Victory Academy cannot take place without the loss of the sixth form. There is not a projected surplus of sixth form provision elsewhere. The full allocation of the site is therefore required in order to deliver necessary education infrastructure.

1.12 Without prejudice to such contentions, the principle of a contingency or reserve site is sound (as set out in our response to Matter 3 Issue 1). However the trigger in this case is not sound – see our response to Question 5 below.

Suggested change

1.13 Our suggested wording for Policy GNLP0581/2043 is set out in response to Question 5 below.

2) Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

2.1 As above, the site has been assessed as having no specific environmental or other constraints, or infrastructure requirements, which would impede delivery now or later in the Plan period.

3) Is the land required in order to deliver a safe and suitable access into the site available?

3.1 Yes. There are two points of access proposed – to the north east via Barnard Road; and to the south east via New Road. Land for access from Barnard Road is in a combination of public highway and Norwich City Council land and so is unconstrained. Recent discussions have focused on the New Road access and whether there is sufficient land within the public highway to deliver the required width of road. We have appended a Technical Note: Access (M-EC, February 2022) which shows an initial proposed access arrangement. This note demonstrates that there is sufficient highway land, alongside Norwich City Council controlled land, to achieve a safe and suitable access.

3.2 The site has excellent potential to provide pedestrian and cycle links between the existing urban area and beyond, including the Norwich Strategic Cycle Network. Routes for a new high quality bus route through the site will also be provided.

4) Has the availability, viability and deliverability of the site been robustly assessed? Would the requirement to provide new educational facilities within the site affect its ability to meet other policy requires, e.g., for affordable housing?

4.1 The latest Viability Appraisal¹⁰ continues to use a typology approach as per the main December 2020 report and this is supported by Planning Practice Guidance¹¹. The different typologies used are set out in Table 1 on page 13 of B26.7, and there are several Urban Fringe/Main Town (including Costessey) typologies assessed, including at 600 dwellings and 1,000 dwellings. This

¹⁰ Supplementary Appendix To the 2020 Viability Appraisal in support of the proposed Greater Norwich Local Plan (May 2021) [B26.7]

¹¹ Should every site be assessed for viability in plan making? Paragraph: 003 Reference ID: 10-003-20180724

demonstrates a positive benchmark land value based on the GNLP policy requirements including 33% affordable housing. In support of our site specifically, CBRE have undertaken viability work on behalf of Terra Strategic – see appended report. It demonstrates that the site, with all policy requirements, would have a viability surplus that is sufficient to accommodate all anticipated development costs and anticipated abnormal and infrastructure costs.

5) Is the proposed trigger mechanism for the release of this site justified and effective?

5.1 No. Notwithstanding our position that the site should be a full allocation, if the policy must remain a contingency site then the trigger as proposed is not sound. It is inconsistent with national policy and there is no policy or evidential basis to justify its approach. It will be reactive and inflexible in its ability to deal with issues in supply as they arise, which will undermine the very reason for its inclusion by the Partnership. One example is if there were unforeseen issues with one or more strategic sites which meant that the Housing Delivery Test (HDT) score was 84% in year 1, 84% in year 2 but 86% in year 3, the allocation would not be triggered. Whilst there are still outstanding matters to be addressed in establishing the housing requirement against which the HDT would be assessed, for simplicity if we assumed it was 49,492 dwellings or 2,475 dwellings per annum, the above scenario would result in under-delivery of 1,138 dwellings over three years, without the contingency site being triggered. In the meantime, the Partnership would have needed to identify actions to remedy the HDT falling to 95% (as required by NPPF paragraph 76). It seems reasonable that one of the actions in this event would be to allow the contingency site to come forward and so we consider any reference to the HDT should reflect the NPPF in this respect.

5.2 Whilst the current trigger represents a failure of the policy in terms of looking back, it is also deficient in its inability to look forward and address issues before they arise i.e. by taking into account five year housing land supply. In the absence of a 5YHLS, the tilted balance is engaged because the most important policies are out of date. This could allow speculative applications from sites which are not allocated or contingency sites. Logically, given it is a contingency / reserve site, this site should be the first reserve site to be developed. Indeed, it could be argued that the absence of a 5YHLS would render the trigger mechanism out of date in any event. There is, however, a lack of certainty and clarity in this regard. The policy would be more effective if it could respond to this issue before speculative applications came forward. This reflects the approach to reserve sites set out in the recently adopted North Warwickshire Local Plan.

5.3 Neither the HDT nor five year supply take into account issues with affordable housing delivery, and so for the reasons we have outlined above, we think the trigger should also refer to this metric.

Suggested change

5.4 To try and address these issues of soundness and to ensure the policy provides flexibility as intended, we have suggested amendments to the wording of the trigger:

“The site will become an allocation for development if any of the following apply at any point in the Plan period:

- a) the Housing Delivery Test shows that delivery has fallen below 95% in the previous year; or**
- b) if annual monitoring data indicates that forecast land supply falls lower than 5.5 years¹²; or**
- c) net affordable housing delivery (as a percentage of overall housing delivery) falls below 28% over a period of two consecutive years; or**

~~there are three consecutive years in which Annual Monitoring Reports show that housing completions in Greater Norwich are more than 15% below annual targets in each year and where under delivery is the result of site specific constraints (for example there are infrastructure or ownership constraints or significant abnormal costs have been identified) preventing the delivery of committed and allocated housing sites.”~~

6) Are the other detailed requirements set out in Policy GNLP0581/2043 justified and effective?

6.1 We are largely supportive of the detailed requirements but we have the following comments to make.

¹² As per the approach to Reserve Housing Sites in the [adopted North Warwickshire Local Plan](#), Policy LP38 / page 80

- 6.2 We are unclear whether there is sufficient evidence to support the need for a new local centre on the site, particularly given the proximity of Sainsbury's within Longwater Retail Park. Whilst we do not propose deleting the requirement, reference is needed around viability / deliverability.
- 6.3 We do not consider that any reference to Norfolk Minerals and Waste Core Strategy Policy CS16 is required (specific matter 7 and 18), but this appears to be included for many sites in the GNLP. We would recommend deleting specific matter 12 as it is not an issue for the masterplan, and matter 7 could be amended to refer to the feasibility of mineral extraction, as is the case for numerous other allocations, for example Policy CC4a.
- 6.4 Discussions with the Partnership have concluded that there is no requirement for land for a pedestrian footbridge to be safeguarded, as this is outside the site boundary. We have suggested this element is deleted.

Suggested changes

- 6.5 Amend specific matter 2: *'Provision of a new local centre on site (approx. 0.3ha) to include a convenience foodstore and three smaller units with parking provision, unless there is evidence suggesting it is not deliverable'.*
- 6.6 Specific matter 6 should refer to the masterplan being illustrative: *'Preparation of an illustrative masterplan to guide the development, submitted as part of the application for planning permission.*
- 6.7 After specific matter 8, the sentence should be amended to: *'The masterplan ~~and other documentation~~ required through this plan should:'* This would ensure the subsequent requirements are clearer and therefore effective.
- 6.8 Specific matter 10 should be amended: *'Include pedestrian and cycle access across the site and to neighbouring residential and retail areas and other services and facilities in Bowthorpe and Costessey (Longwater) and to the open countryside to promote active travel. ~~This should include safeguarding of land for a pedestrian footbridge over the A47~~'*

- 6.9 Specific matter 12 should be amended to avoid being too prescriptive given the relationship with adjacent housing may influence a different approach: *'Set out the distribution of land-uses across the site. ~~The education facilities and local centre should be centrally located on the site.~~*
- 6.10 Delete specific matter 12 and amend 7 to read: *'Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is partly underlain by safeguarded minerals resources. The benefits of extracting the minerals, if feasible, will be taken into consideration.*
- 6.11 Delete specific matter 15 and 16 as the arboricultural and ecological information are application requirements that are unnecessary to refer to here in relation to the masterplan.
- 6.12 Amend specific matter 17 to read: *'Mitigate surface water flooding, ~~particularly in the east of the site.~~*