

Matter 9

Issue 2: Land between Fir Covert Road and Reepham Road, Taverham (Ref GNLP0337R)

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

Q2: Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

- 1.1 This supplementary statement is submitted to emphasise our contention that the justification for the allocation of GNLP0337R has been developed and assessed in a manner which is not comparable with the assessments undertaken on other reasonable alternative sites, in particular with sites GNLP0332R and GNLP0334R. We have made these points in general terms in our representations to Matter 1 Issue 2 and remain of the view that the plan is not in compliance with statutory procedures and legal requirements. The following statement highlights in a more site-specific manner the issues most relevant and stark in the comparison of assessments between sites.
- 1.2 Policy GNLP0337R contains requirements to address specific matters in mitigation of identified perceived short-comings of the site. These include provision of on-site recreation, community facilities, primary school, local centre and land for medical care facility. For the same reason of mitigation, the policy also requires the master plan to demonstrate:
 - Detailed arrangements for access
 - Off-site improvements to the highway network
 - Safeguarding of landscape enhancements and buffer of the Marriott's Way
 - Provision of a significant landscape buffer adjacent to the A1270
 - Provision of adequate noise mitigation measures to protect residential amenity
 - Submission of an Arboricultural Impact Assessment (AIA) to protect or to mitigate any harm to trees on site
- 1.3 The Promoters have subsequently produced an attractive suite of documents to demonstrate how these measures of mitigation might be achieved. The Inspectors will form their own views on whether or not these measures provide the necessary comfort that the suitability of the site has been satisfactorily justified.
- 1.4 It is our submission that the allocation site GNLP0337R has not been sufficiently justified by the Partnership's comparable consideration of other reasonable alternative sites and the abilities of those sites to mitigate any perceived short-comings of their own.
- 1.5 As discussed in our representations on Matter 1 Issue 2, sites GNLP0332R and GNLP0334R located directly adjacent to the urban fringe of Hellesdon were considered as reasonable alternatives through the Partnership's site assessment process up to stage 7 in a seven stage process. This is described in the relevant Horsford Booklet (Doc B1.39). We heard from the Partnership in the Matter 1 Issue 2 sessions that all submitted evidence was considered in the assessment process. We also heard from the Partnership's SA consultants that all sites were additionally assessed and compared through the SA process having regard to the evidence which had been provided to the consultants by the Partnership. Notwithstanding these assurances, I contend that we have seen no documents to confirm that evidence of mitigation provided on behalf of our clients at the Regulation 18C and subsequent stages was considered. This is in stark contrast with the assessment and consideration given to the proposed mitigation of perceived short-comings on allocated site GNLP0337R.



- 1.6 The perceived short-comings identified for the allocated site GNLP0337R, subsequently referenced in the policy requirements and presumably considered to be capable of being satisfactorily mitigated are similar to the identified perceived possible shortcomings of sites GNLP0332R and GNLP0334R. The Horsford Booklet (Doc B1.39) notes these at pages 35 -37 and appear to have been raised not by the SA process but instead in a series of private meetings between officers with responsibility for highways, development management, flood risk and children's services. In the case of GNLP 0332R and GNLP0334R these perceived short-comings are listed as *"potentially significant landscape issues.....noise and safety concerns with the airport,.....loss of roadside trees to provide site access.....relationship to existing built form and services."* The same concerns have been repeated in the Partnership's summary of responses to representations (Docs A8.16 and B1.62) all with no reference to submitted evidence of mitigation in relation to landscape, noise, airport safety, loss of trees and access to services. All submitted evidence is contained for the Inspectors' information in our client's Reg 19 submissions. As contended above this approach is in stark contrast to the that taken in the consideration of GNLP 0337R.

Recommended remedy

- 2.6 In accordance with our representations on Matter 1 Issue 2, we believe that additional assessment work is required to ensure that the plan is legally compliant and sound. The additional assessment work will need to assess all reasonable alternative sites in a transparent and comparable manner.
- 2.7 For the avoidance of doubt and to provide the Inspectors with clarity, although we have referred to sites GNLP0332R and GNLP0334R we do so as examples of the inconsistent approach adopted by the GNLP. The examination of the submitted plan does not represent an opportunity to debate the merits of individual omission sites.