

Matter 9

Issue 4: Costessey contingency site (Ref GNLP0581/2043)

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 Introduction

- 1.1 This supplementary statement is submitted to emphasise our contention that the justification for the identification of GNLP0581/2043 as a contingency site 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 We also maintain that while we are fully supportive of the GNLP identifying contingency sites in order to protect the delivery of sufficient housing sites in a plan which is so reliant on large and delivery fragile sites, GNLP 0581/2043 is not fit or effective for its stated purpose.

2 Not justified and supported by comparable evidence

- 2.1 Policy GNLP0581/2043 contains requirements to address specific matters in mitigation of identified perceived short-comings of the site. These include provision of on-site local centre, adequate landscaping and green infrastructure, land for new primary school and sixth form college, a significant landscape buffer adjacent to the A47, noise mitigation measures to protect amenity and Arboricultural Impact Assessment (AIA) to protect or to mitigate any harm to trees on site. The policy also requires further substantial infrastructure with the provision for off-site improvements to the highway network to address the impact of the development on the Longwater Junction with the A47 trunk road and on New Road.
- 2.2 The Promoters have subsequently produced an attractive suite of documents to demonstrate how at least some of the on-site 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. There is no evidence that the off-site highway improvements can be satisfactorily achieved, an issue which will be dependent upon many other factors at the time of delivery, including background traffic levels, progress on the delivery of other major consented developments at Easton and Longwater Business and Retail Park all generating traffic onto the already busy Longwater A47 junction.
- 2.3 It is our submission that the allocation site GNLP0581/2043 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.
- 2.4 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 B 1.39). 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 the allocated contingency site GNLP0581/2043

2.5 The contrast between the consideration of how or if identified concerns could be mitigated in the various reasonable alternatives considered in the Partnership’s assessment process is best illustrated in the case of GNLP0581/2043 by the approach taken to landscape. We are informed by the Partnership that sites GNLP0581, GNLP2043, GNLP0332R and Gnlp1334R were all considered using the same site assessment process methodology (Doc B1.1) The table below provides a comparison of the comments and conclusions from each stage of the process for each of the sites in relation to impacts on landscape.

| | GNLP0581 (Doc B1.4) | GNLP2043(DocB1.4) | GNLP0332 (DocB1.39) | GNLP0334 (DocB1.39) |
|--|---|---|---|--|
| Stage 2 HELAA tables | Amber | Amber | Amber | Amber |
| Stage 4 Discussion of Submitted Sites | “Within the Norwich Southern Bypass Landscape Protection Zone and the majority is within designated river valley so there may be landscape considerations but development here would avoid many of the river valley issues associated with other sites in Costessey.” | “It is within the Norwich Southern Bypass Landscape Protection Zone.....” | No landscape reference | No landscape reference |
| Stage 6 HELAA Conclusion | “Number of constraints including....landscape impacts,....townscape concerns that would require mitigation for development to be acceptable. The entire site is within the Norwich Southern Bypass Landscape Protection Zone and the majority is within designated river valley.” | “The site is in the designated river valley and Norwich Southern Bypass Landscape Protection Zone, which may require mitigation.” | “..the site would extend Hellesdon northwards, raising landscape considerations about the urban edge inside the route of the Broadland Northway.” | “In terms of constraints, some consideration will be needed to the landscape, biodiversity and townscape implications, as the site abuts Drayton Woods (which is a County Wildlife Site).” |
| Stage 6 Development Management | No landscape reference | “The site is not suitable for allocation due to impacts on form and character and landscape issues.” | “The site raises potentially significant landscape issues given the scale of development and setting between | Site would be a significant expansion into countryside and impact character of Reephams Road. Critical would be |



| | | | | |
|---------|---|------------------------|--|--|
| | | | existing built edge and NDR.” | how roadside trees are dealt with to provide access s these provide attractive feature.” |
| Stage 7 | “There are issues regarding....the site’s location in the Southern Bypass Landscape Protection Zone and designated river valley.” | No landscape reference | “...the site raises potentially significant landscape issues given the scale of development and setting between the existing built edge and the Broadland Northway.” | “...would represent a significant expansion into the countryside and would impact on the character of Reepham Road.” |

2.6 Given the less than enthusiastic and inconsistent comments and conclusions through the site assessment process in relation to landscape concerns on sites GNLP0581 and GNLP2043 one might have, at minimum, expected a transparent assessment and explanation of how each site became acceptable in landscape terms. One might have also expected a comparable assessment with other reasonable alternatives. As explained in our Matter 1 Issue 2 statements, the same lack of comparable assessment relates to that contained in the SA.

3 Not effective

3.1 In order to be effective as a contingency site able to deliver homes in the event other sites have been unable to maintain the annual targets for housing delivery it will be necessary for the site to be ready quickly for early delivery. A site for in the region of 800 homes with substantial infrastructure requirements is unlikely to be one which can be delivered at speed and begin early completions. The infrastructure requirements for the site are indeed substantial and will require the co-operation of a number of third party stakeholders and the identification of mitigation solutions including those already known in the area to be particularly difficult related to improvements at the Longwater junction with the A47.

4 Recommended remedy

4.1 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 contingency sites in a transparent and comparable manner.

4.2 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.