

# **Representation to the Inspectors' Matters Issues and Questions (March 2023 Sessions) for the Greater Norwich Local Plan**

## **Matter 4**

**On behalf of Barratt David Wilson Homes (Eastern Counties)**

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## **Matter 4: Sustainable Communities and the environment**

### **Issue 1: Is Policy 2 justified, effective and consistent with national policy?**

**Q16) Is the modification to Policy 2 suggested by the GNLP (in the Nutrient Neutrality Mitigation Statement of Common Ground with Natural England) justified, effective and consistent with national policy, the Written Ministerial Statement of 16 March 2022, and the evidence?**

- 1.1. The Partnership's constructive approach is welcomed to find workable solutions in response to the persistent nutrient neutrality issue. Barratt David Wilson Homes (BDW) support the proposed alterations to Policy 2, as the policy is considered to be justified, effective and consistent with national policy. Notwithstanding this, further comments are raised below, which require some further consideration by the Partnership to ensure that the policy can be implemented effectively and efficiently and any delays to housing delivery are kept to a minimum.
- 1.2. The ongoing work with Anglian Water to establish a Joint Delivery Vehicle (JDV) to deliver various mitigation options between providers, landowners, and developers is believed to be a workable solution. It is noted that reports on the JDV are being considered by relevant council's cabinets between January and March 2023 with a view to mitigation credits being available for purchase by Spring 2023. The collective efforts to restart the planning process and deliver the much-needed growth for the area are recognised and appreciated. However, at the time of writing, there are no details of specific timescales for credits to be released and importantly the costs of the credits.
- 1.3. Developers require these details to provide them with greater certainty, particularly from a viability perspective (as further outlined in Q17 below), when considering these additional costs alongside other costs such as mandatory net biodiversity gain requirements and increased build costs. Further delays and uncertainty with the implementation of a suitable credit scheme will in turn impact the delivery of strategically important sites affected by the nutrient neutrality issue.
- 1.4. It is welcomed that the additional requirements of Policy 2 only apply whilst the protected habitat sites are in an unfavourable condition. It is crucial that this is seen as a temporary solution, until such time as the statutory undertakers can deliver a longer term solution.

**Q17) Is the application of the Policy 2 as suggested to be modified in Q16 likely to affect the viability and deliverability of residential development in the plan area?**

- 1.5. Yes, the modifications to Policy 2 will inevitably affect the viability and deliverability of residential development in the plan area. The addendum to the 'Greater Norwich Local Plan Viability Study' (B26.3) relates to the costs of mitigating Nutrient Neutrality requirements and takes a precautionary approach using two scenarios for its modelling based on mitigation costing £5,000 or £7,000 per dwelling. The cost estimates are based on the experience of other LPAs that have been subject to nutrient neutrality issues for a longer period of time than Greater Norwich area. These include areas that have been required to address the issue of nitrates and not phosphates. Critically, nitrate mitigation does not require as much land as phosphates, so the cost may be higher. Therefore, with potentially higher cost estimates, the viability and deliverability of schemes across Greater Norwich could be significantly affected.

- 1.6. There is presently a very limited understanding of the impact that meeting nutrient neutrality might have upon development costs will have; as such this introduces a degree of uncertainty, which could undermine the viability of sites caught by nutrient neutrality and, potentially, plan delivery.
- 1.7. Consequently, it is essential that viability is carefully considered alongside other financial contributions, such as biodiversity net gains, affordable housing and rising build costs. These other contributions will need to be considered on an individual basis alongside the nutrient neutrality credit costs to enable the continued delivery of homes in the most sustainable locations within the Greater Norwich area.

### **Q18 is the nutrient neutrality mitigation strategy likely to be successful in facilitating the delivery of the plan?**

- 1.8. The Partnership's approach is welcomed through its nutrient neutrality strategy, as the implications of this matter are already proving to be significant on housing delivery and will continue to be so over the plan period. As outlined in the responses to Q16 and Q17, there is still uncertainty with regards to the expected costs and timescales of the nutrient neutrality credits. The implications on viability are particularly significant. Any increases in costs will impact on the level of affordable homes developments can deliver, especially on brownfield sites where other costs may also impact upon viability. This in turn, could mean a requirement for more homes across additional sites located outside of the Natural England nutrient neutrality catchment area, which could potentially be in less sustainable locations. The Partnership will need to proactively work with all stakeholders to enable the delivery of allocated sites and ensure that the impacts on viability are workable and that delays are kept to a minimum.
- 1.9. The Partnership must prioritise resolving the nutrient neutrality matter for sites and allocations that are already delivering housing. This is because the cost implications of developers having to stop work on a site and potentially redeploy the workforce elsewhere are significant. If credits were to be released in batches, then great weight must be attached to ensuring that sites such as our client's site at Cringleford, can continue to deliver housing and that there are no further delays in the planning process.

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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