



**GNLP Regulation 18 Consultation Response
March 2018**

**Proposed New Garden Village, Hethel
GNLP Site1055
Prepared on behalf of Glavenhill Strategic Land**

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1. Executive Summary

In order to meet the significant requirement for new homes, and to ensure a bright and prosperous future for the Greater Norwich area, an ambitious strategy is essential. It is our view that a new Garden Village settlement at Hethel in the Cambridge-Norwich Hi-tech corridor is key to that.

The proposed allocation site comprises 351 hectares of land straddling the B1135 Wymondham Road to the south west of the Lotus Car Works site and the Strategic Employment allocation at Hethel. It is well related to and within easy travel distance of, the A11 to the west. The site is within single ownership and under the control of Glavenhill Strategic Land. It is available for development now.

The site offers a sustainable location for the delivery of up to 2000 homes within the plan period to 2036 at sufficient scale to support its own range of services whilst minimising the impacts of additional housing growth upon established settlements in the Greater Norwich plan area. It is an ambitious strategy that can deliver clear benefits over and above the other growth options.

Through its strategic location and scale, the site presents a unique opportunity to deliver on the ambitions of the Cambridge-Norwich hi-tech Corridor. It can help to ensure that housing and employment opportunities are closely aligned with the ambitions of the New Anglia LEP Strategic Economic Plan which aims to deliver economic growth within Greater Norwich, including in-particular, the A11 corridor. This location is specifically identified in the Strategic Economic Plan for its high impact sector activity and is expected to grow over the plan period.

By planning at scale to the Garden Village model, there is an opportunity to not only provide high quality housing, long term stewardship and land value capture, but also to understand the needs of the wider local area, which through a Development Corporation or local development agreement, can mean that the local authority is at the heart of the development process, providing leadership and reassurance around delivery.

A new Garden Village can ensure a range of local facilities and infrastructure e.g. new and improved school provision, including a new High School which could serve the new settlement and Wymondham, and also grasp the opportunity for Further Education, potentially linked to the Hethel Technology Park.

Glavenhill Strategic Land broadly support Growth Option 3 to support the Cambridge- Norwich hi-tech corridor. However, the overall housing requirement number of 7200 dwellings derived from an OAN of around 39,000 is not supported and is considered to be too low. It is considered that a properly assessed housing requirement is in the region of 11,000 to 14,000 new homes.

The New Settlements Topic Paper accompanying the Growth Options Document sets out a list of broad criteria for assessing the suitability of locations for new settlement development. We have

used this list as a broad basis for assessing the suitability of the Hethel Garden Village Site and the results show that the site is suitable for development of a new settlement.

The GNLPA HELAA assessment concludes that the site is suitable for accommodating new residential development. Glavenhill Strategic Land also conclude that there are unlikely to be any over-riding constraints to development of the site. Glavenhill Strategic Land are committed to undertaking more detailed technical assessment work on key topics, if there is a firmer commitment given to pursuing a new settlement in this location.

Glavenhill Strategic Land respectfully request that the proposed allocation site be considered for allocation within the Greater Norwich Local Plan.

2. Site Introduction and Description

This site was previously put forward under the July 2016 'Call for Sites' for a new garden village (site reference GNLPO481). These representations seek to build on that original submission and provide evidence to support the allocation of a new garden village for up to 2000 new homes within the plan period to 2036 with the opportunity for a further 3160 homes to be delivered beyond 2036. Glavenhill Strategic Land believe that this site represents a unique opportunity to deliver upon the ambitions of the Cambridge-Norwich hi-tech corridor through sustainable long-term planning that ensures that jobs, homes and infrastructure are delivered where they are needed and provide the most economic benefit to Greater Norwich.

The proposed allocation site comprises 351 hectares of land straddling the B1135 Wymondham Road to the south west of the Lotus Car Works site and the Strategic Employment allocation at Hethel. It stretches as far as St Thomas Lane to the north and the village of Silfield to the south and is well related to and within easy travel distance of, the A11 to the west. A Site Location Plan is contained at Figure 1, Section 3 of this document.

The site comprises primarily Grade 3 agricultural land comprising a number of cultivated fields divided by rows of well-established hedgerows and trees. There is an area of woodland within the site to the north east of Stanfield Hall which is designated as a County Wildlife Site. The area to the north of the B1135 borders Stanfield Hall which is Grade II* Listed. The Hall and its curtilage are located outside of the proposed allocation area. Section 6 of this document provides an assessment of site constraints.

The proposed allocation area is within single ownership and under the control of Glavenhill Strategic Land. It is available for development now.

3. Site Location

See Site Location Plan Appendix 1

4. Site Opportunities

Glavenhill Strategic Land considers that the housing requirement figure for the Greater Norwich Local Plan to 2036 is in the region of 11,000-14,000 new homes, rather than 7200 homes as set out at our response to Question 4 of the Growth Options Consultation (see section 5 of this document). In order to meet this significant requirement for new homes, and to ensure a bright and prosperous future for the Greater Norwich area, an ambitious strategy is essential.

It is our view that a new settlement at Hethel in the Cambridge-Norwich Hi-tech corridor is key to that. The site offers a sustainable location for the delivery of up to 2000 homes within the plan period to 2036 at sufficient scale to support its own range of services and with the potential to expand further within the next plan period.

It is the best way to help bring forward the GNLP Vision *“to grow vibrant and healthy communities, supported by a strong economy and the delivery of homes, jobs, infrastructure and an enhanced environment.”* and to meet the objectives contained at page 17 of the Growth Options document:

Objective 1 - Homes

A new Garden Village, designed to recognise the existing attributes of the local area, provides an opportunity to provide sustainable, high quality housing, long term stewardship and land value capture. We would propose a Local Development Agreement approach to ensure that the local authority is at the heart of the development process, providing leadership, but also reassurance around delivery. New settlements can be part of a long-term plan where trajectories can be agreed and local authorities play a crucial role in ensuring that the development proceeds in line with a series of core values and principles, linked to good governance, long term stewardship and infrastructure funding. See our background paper (Appendix 2) for further detail).

We anticipate that this site has the ability to deliver around 2000 new homes within the plan period to 2036 and a further 3160 beyond 2036. This means it can make a significant contribution towards meeting the Greater Norwich housing requirement and will alleviate the pressure to take more housing growth on existing towns and villages within Greater Norwich.

Objective 2 - Community

By planning at scale, new settlements can ensure a range of local facilities and infrastructure essential to support new residents and ensure a good quality of life in a well-designed place. We envisage that this site could provide new education facilities including a new high school and sixth form to serve both the development and Wymondham, plus new health and community facilities and significant green infrastructure provision.

The new settlement at Hethel can take advantage of long term funding streams to provide new infrastructure needed to support the new community and the wider area. Smaller scale sites can

only provide new facilities and infrastructure through the pooling of contributions arising from the development of expensive edge of settlement land. This means that there is often not the scheme viability to make significant contributions. We therefore consider that the site at Hethel provides a real opportunity to create a new community with properly planned supporting services and facilities and good access to hi-tech jobs at Hethel, the NRP and elsewhere within the corridor.

Objective 3 - Economy

Policy 9 of the existing Joint Core Strategy (JCS) identifies land at Hethel (to the immediate east of the proposed allocation site boundary) as a strategic employment location and states that there should be expansion of activity there, including a new technology park to focus on advanced engineering and the growth of technology capabilities.

The site is allocated under Policy HETHEL 1 and 2 for uses associated with, or ancillary to, advanced engineering and technology based business and will form an extension to existing employment development at Hethel.

The allocation at Hethel forms part of a wider regional economic strategy to deliver a 'technology corridor' between Cambridge and Norwich, providing over £500m of innovation-led growth, infrastructure investment, housing and skills.

The Tech Corridor proposals are being led by a partnership of borough and district councils and local employment partnerships located across East Anglia. It is the partnership's objective to draw on a fast-growing economy and the existing world class universities, research institutes and tech business within the area and to retain and grow the knowledge pool and skills of those working within these environments.

The proposed allocation site is well placed to support the partnership in delivering their ambition, being strategically positioned within the heart of the tech corridor with excellent links to the A11 and existing businesses and growth areas at Hethel, the Norwich Research Park and the 20-hectare employment allocation at Browick Road (within 2km of the site).

The proposed allocation site presents a unique opportunity to deliver a high-profile strategic employment site for Norfolk and the wider eastern region, specialising in advanced engineering and technology. The provision of up to 2000 new homes and community uses within the plan period would further support the GNDP in meeting the Greater Norwich Local Plan housing requirement to 2036 (which we consider is in the range of 11,000 to 14000 homes. See our response to question 4 for further information).

A new Garden Village at Hethel would ensure housing and employment opportunities are closely aligned with the ambitions of the New Anglia LEP Strategic Economic Plan which aims to deliver economic growth within Greater Norwich, including in-particular, the A11 corridor. This location is identified in the Strategic Economic Plan because it hosts high impact sector activity and is expected to grow over the plan period. There is a recognition within the Economic Plan that *"the northern part of the corridor has strong potential to develop its advanced manufacturing sector with a focus on Hethel Science and Technology Park and Snetterton."* A new Garden Village at

Hethel will therefore, provide the best support to enable the jobs potential of the Hi-Tech corridor to be realised in addition to jobs growth associated with the city centre, and NRP.

The focussing of significant growth in the Cambridge-Norwich hi-tech corridor could effectively create an extension of the Cambridge, Milton Keynes, Oxford corridor, which will be the subject of significant investment. In order to compete effectively with and benefit from the Cambridge regional growth, a new settlement at Hethel and the corresponding investment and jobs growth this will bring is essential.

Objective 4 - Infrastructure

A new Garden Village in the Hi-Tech corridor provides infrastructure opportunities. It will enable the delivery of essential facilities that not only benefit the occupiers of the new dwellings, but also existing and nearby communities. The receipts that will be generated from the development, will mean that new schools can be built, meeting a need for the surrounding area as part of a comprehensive master plan. This is far more secure than the pooling of planning contributions which often fails to deliver. This will also be the case with countryside environments, health and community facilities and sports and leisure. All of these can be secured as part of a comprehensive plan, which due to the certainty created by the planning system, through some form of development company or corporation, the involvement of long term patient investment and avoiding the most expensive land adjacent to towns and cities, can ensure that these will be provided.

This will also be the case with local transport links and infrastructure, which benefit the wider area, but can also enhance existing infrastructure, such as rail and public transport facilities. They also create an opportunity to provide sufficient quantum of development to support existing employment, create new employment areas and also support training, again for the wider area.

Objective 5 - Delivery

The allocation site is within a single land ownership and Glavenhill Strategic Land have a promotion agreement with the landowner. A new settlement provides the opportunity to set up a Local Development Agreement approach to ensure that the Greater Norwich Development Partnership is at the heart of the development process, providing leadership and reassurance around delivery.

New settlements can be part of a long-term plan where trajectories can be agreed and the Greater Norwich Development Partnership play a crucial role in ensuring that the development proceeds in line with a series of core values and principles, linked to good governance, long term stewardship and infrastructure funding. Overall, we believe that this is the only approach to secure the certainty, level of investment and infrastructure needed to achieve the aims and aspirations of the Plan.

Objective 6 – Environment

The environmental impact of expansion of existing settlements, particularly urban expansions can be significant. Many edge of town locations are often of high ecological value, perform an amenity role, provide access to the countryside and employment, but also incorporate meadow

and woodland or biodiversity rich environments. In addition, urban expansion can be problematic in terms of the preservation of character and integrity of existing settlements and sites are often surrounded by existing edge of village residential properties, most of whom object to the new development.

A new Garden Village at Hethel provides the opportunity to provide significant new housing and employment in an area of low ecological potential and without adversely impacting on the character of an existing village, or the amenity of many existing houses. It also offers the opportunity to provide significant new green infrastructure, masterplanned into the development from the start to provide green space and ecological enhancement.

Pursuing a new settlement in this location offers a real opportunity to deliver new homes and hi-tech job creation in the identified Cambridge-Norwich hi-tech corridor and will have less impact upon existing towns and villages than too many bolt-on urban extensions that do not always provide the required level of infrastructure and facilities.

Conclusions

Consideration of the proposed Garden Village against the key plan objectives above demonstrates that it offers a real opportunity to deliver homes and jobs growth in a sustainable manner, supported by key infrastructure, whilst minimising the impacts of additional housing growth upon established settlements in the Greater Norwich plan area. It is an ambitious strategy that can deliver clear benefits over and above the other growth options. See Glavenhill's responses to Consultation Questions 1-13 (section 5 of this document) in particular for further information

An illustrative concept masterplan showing one way in which the proposed allocation area may be brought forward can be provided to the GNDP if considered of assistance in considering the site's development potential.

5. Consultation Questions

**answer/delete when appropriate

Section 3 – The Vision and Objectives for Greater Norwich

1. Do you agree with the draft version and objectives for the plan below?

Yes, we broadly agree with the vision and objectives for Greater Norwich to 2036 as set out at Figure 1, subject to our more detailed representations on specific issues below.

Section 4 – The Strategy

Delivering jobs, homes and infrastructure

2. Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1-4.7?

The Greater Norwich Local Plan is an opportunity to make the wider Norwich area a hub for investment, commercial activity and high- quality place making, which will be of benefit to all who live and work there, building on the significant existing attributes.

We welcome the joint working of the different authorities, who will lead the planning process for this Plan, in our view to take the required strategic view essential to the future prosperity of the Greater Norwich area.

We are presently at a unique position, where there is a recognition that growth is needed, there is a need for investment particularly on key infrastructure, clear opportunity areas (particularly around the A11 corridor) and a recognition that new settlements may form a key role in ensuring delivery.

There is a need for the Greater Norwich area to benefit from the economic growth at Cambridge and not be left behind by its accelerated investment. Greater Norwich at the very least must protect its economic position and not get left behind.

It is our view that there are a series of opportunities that recognise the existing attributes within the area, but which can also secure the levels of economic growth which will be of benefit to those who live and work here.

There is a recognition in the Regulation 18 consultation of the positive attributes of the Greater Norwich area, which are supported. However, to ensure a bright and prosperous future an ambitious strategy is essential, which also respects existing key characteristics.

We have serious concerns regarding the calculation of the overall housing requirement for the plan period as set out in our answer to question 4 below. The favoured option must be to deliver forecast jobs growth plus additional growth. We are of the view that a realistic assessment of the requirement would lead to a figure of between 11,000-14,000 homes in order to deliver City Deal jobs growth aspirations.

It is our submission that a new settlement in the Cambridge-Norwich Tech Corridor is the best way to help bring forward the objectives contained within the GNLP. We believe that the topic paper and the text at 4.58 to 4.63 has failed to understand the benefits of such an approach. The barriers identified in this text, such as infrastructure delivery, should not be seen as prohibitive, as planned new settlements can create certainty for income streams and patient investment, to secure the required infrastructure and wider improvements.

Therefore, in support of our submission, we provide our own background topic paper prepared in consultation with industry leading figures with experience in delivering & managing new settlements, both internationally in other parts of the UK, reflecting on expansion of existing and new settlements.

A new settlement needs to sit alongside a range of smaller sites to be apportioned and located as set out in our response to question 9 to ensure a choice of sustainable sites and to facilitate delivery of required housing numbers within the plan period.

Job Targets

3. Which option do you support for jobs growth? (refers to options on pg.28)

There is a recognition in the Regulation 18 consultation of the positive attributes of the Greater Norwich area, which are supported, however to ensure a bright and prosperous future an ambitious strategy is essential, which also respects existing key characteristics.

The Greater Norwich Local Plan is an opportunity to make the wider Norwich area a hub for investment, commercial activity and high-quality place making, which will be of benefit to all who live and work there, building on the significant existing attributes.

The favoured option must, therefore, be to deliver forecast jobs growth plus additional growth (Option JT1).

Calculating the Housing Numbers for the Plan

4. Do you agree that the OAN for 2017-2036 is around 39,000 homes?

We broadly support Growth Option 3 to support the Cambridge- Norwich hi-tech corridor. However, the overall housing requirement number of 7200 dwellings derived from an OAN of around 39,000 is not supported and is considered to be too low.

The GNDP's 2016 call for sites consultation considered that sites for around 12,000 new homes were needed. It is surprising that this has reduced so significantly to 7200 for this round of consultation. We are very doubtful that this figure is sufficient to meet the housing requirement for Greater Norwich for the period to 2036.

At this point in time we do not support the use of the Government’s proposed methodology for the calculation of OAN as set out in the consultation paper ‘Planning for the Right Homes in the Right Places’. This is still at the consultation stage and has been subject to a significant number of representations objecting to various aspects of the proposed calculation e.g. from the Planning Officers Society, Homebuilders Federation and the RTPI. One of the many failings of the proposed methodology is the absence of consideration of economic objectives. There is no certainty that this methodology will come into effect, either in its current form, or at all and we cannot, therefore, understand why it is being used at this point in time.

We do not support the figure of 7200 homes arising from the use of the draft Government methodology for the calculation of housing numbers. Para 4.17 of the Growth Options Document states that the OAN figure for Greater Norwich is 38,988 dwellings for 2017 - 2036 based upon this methodology. This figure should be used with caution because it uses figures taken from the ‘Application of proposed formula for assessing housing need, with contextual data’ table that accompanies the Government Consultation document. This is an indicative assessment of dwellings per annum need based upon a draft formula for the period 2016-2026, rather than for the period 2017 -2036. Furthermore, it does not consider economic objectives for the area.

Government draft OAN figure 2017-2036:	38,988
Minus commitments of:	35,665
Sub Total:	3,323
Plus 10% buffer on 38,988	3899
TOTAL HOUSING REQUIREMENT (2017-2036 as contained within Growth Options Document)	7222

The calculation of the OAN should in any event be only a starting point for calculating housing numbers for the plan. The Government OAN figure does not include the housing necessary to deliver economic objectives via the City Deal which has been agreed with Central Government in order to help turn knowledge into growth and 13,000 additional jobs’. Delivery of these objectives is necessary to ensure that the area is eligible to receive the related Government funding for infrastructure and business support, enterprise and innovation that is due from this. We consider that it is important that the City Deal requirements are included as they have already been committed to and will contribute to the Greater Norwich and wider economy.

Plan makers are entitled to utilise different methods of assessing need to the Government’s draft methodology and if these produce figures that are higher, the Government proposes that Inspectors should consider such approaches sound unless there are compelling reasons to indicate otherwise. Therefore, where it is sensible to propose higher figures based on employment growth or higher affordable housing needs there is scope to do this and the “significant contribution” that Government sees the City Deal making “to the recovery and future growth of the UK economy” (source: Greater Norwich City Deal) is valid justification for this.

Furthermore, paragraph 158 of the NPPF requires that Local Plans ensure that strategies for housing and employment set out in their plans are integrated and take full account of relevant market and economic signals. Not to include the City Deal requirements would be a failure to meet this requirement.

If the City Deal housing requirements are added to the Government OAN figures the housing requirement for the period 2017-2036 should be as follows:

Government draft OAN figure 2017-2036:	38,988
Minus commitments of:	35,665
Sub Total:	3,323
Plus, City Deal Housing Requirement from 2017 SHMA (SHMA fig:101)	8,361
Subtotal:	11,684
Plus 20% buffer on sub-total (see qu. 6 reasoning below):	2337
TOTAL HOUSING REQUIREMENT (2017-2036):	14,021

We consider that the up to date Strategic Housing Market Assessment June 2017 figures for the calculation of the housing requirement should be used until the Government’s methodology is formally put into practice. The SHMA sets out a Policy -on full objectively assessed need for housing for the period 2015-36 for the Greater Norwich Area of 44,714 **including** the City Deal housing requirement (Figure 96: Central Norfolk Strategic Housing Market Assessment 2017). This would indicate a residual requirement of 10,859 homes 2015-2036 taking into account a 20% buffer:

Policy-on SHMA OAN figure including City Deal:	44,714
Minus commitments of:	35,665
Subtotal:	9,049
Plus 20% buffer on sub-total (see qu. 6 reasoning):	1810
TOTAL HOUSING REQUIREMENT (2015-2036):	10,859

Paragraph 5.7 of the SHMA states:

” We would note that in the Central Norfolk SHMA 2015, the potential impact of the City Deal was considered part of the OAN, but greater clarity now indicates that it is an aspirational jobs target which **should be treated as part of the housing requirement** (our emphasis), not the OAN.”

It is important that the City Deal requirements are not ignored and are included in the final housing requirement figure as they have already been committed to and will contribute to the Greater Norwich and wider economy. This should be the case whether the Government or SHMA OAN methodology is used.

Both scenarios suggest that the housing requirement to 2036 should be significantly **higher** than the 7200 homes specified in the Growth Options Document and a figure in the range of 11,000 to 14,000 would be more appropriate.

We note that the Growth Options Document is unclear about the proposed base date of the plan and we consider that clarity on this is required once the OAN methodology is confirmed. Rebasing the start date of the Local Plan to 2017, should not be used as an excuse to reduce previous backlog. Both above methodologies are set to different plan start dates, but both are intended to take into account previous backlog in assessing the housing requirement going forward.

We also consider that the deliverability of some of the existing 35,665 commitments may be questionable and further consideration should be given to this to ensure that it is a robust figure to use in the calculation of the housing requirement.

5. Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?

The figure of 7200 homes is considered to be too low for the reasons set out above and also because a 10% delivery buffer is too low. This is particularly the case bearing in mind the track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current Joint Core Strategy. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area. Whichever of the 6 growth options, or variations on them is finally chosen, it is likely that the vast majority of housing will be allocated in locations in and around Norwich because this is a sustainable model for future growth. All of the growth options show over 70% of housing to be located within the Norwich Policy Area. We consider that in order to ensure competition and choice in the availability of housing land and reduce the future likelihood of lack of 5-year supply, a 20% buffer should be added to the OAN figures for the purposes of calculating the housing requirement. Windfalls should not be relied upon to make up any shortfalls. (see question 6 for more information).

6. Do you agree that windfall development should be in addition to the 7,200 homes?

Paragraph 4.24 of the plan states that “based upon current trends and projected future delivery, it is estimated that an additional supply of up to 5,600 dwellings could be provided during the plan period on “**windfall**” sites. This is likely to be an over estimate. Recent trends have been very much influenced by the lack of 5-year housing land supply within the Norwich Policy Area. If during the new plan period there is no longer a shortage of 5-year land supply, then the amount of delivery on windfall sites will be significantly reduced. Windfall development in recent years has also been dependent upon the availability of unallocated brownfield sites within the city and other towns becoming available. Due to the emphasis on brownfield development in recent years it is considered that the availability of this source of windfall is also likely to be reduced during the future plan period. There should not be any reliance placed upon significant amounts of windfall coming forward within the plan period to deliver the required housing numbers. Windfall should be in addition to the final housing requirement number chosen.

Delivering Infrastructure

7. Are there any infrastructure requirements needed to support the overall scale of growth?

Inevitably with any significant housing and employment growth there will be supporting infrastructure requirements. It is essential that these are properly planned for at the outset. There is a need for investment particularly on key infrastructure. The opening of the NDR will help to facilitate growth to the east and north of the city. It is also likely that improvements will be required to A47 southern bypass junctions, e.g. Thickthorn, Longwater to ensure sufficient capacity. Opportunities for better public transport linkages including rail and bus also need to be properly considered.

The East West Rail Consortium, which includes Norfolk County Council and Norwich City Council commissioned Atkins to research the possible impact of an enhanced rail link between Cambridge, Norwich and Ipswich. This concluded that there are economic benefits to be derived from this project, the details of which are now being examined in greater detail. Enhanced links into Cambridge and London, with the return of local rail links, such as in the Wymondham area creates an exciting opportunity for a strategic transport strategy, which will promote growth arising from the A11 route, as well as improved rail, which will support a modal shift.

We also consider that it is essential that healthcare and social services requirements including GP surgeries, care facilities and specialist care are properly assessed and planned for at an early stage. This requires proper engagement with, and input to, the process of plan making from the NHS to ensure that health facilities are not left over to be provided on a site by site basis. This only serves to fuel local opposition to new development. We consider that, where appropriate, there should be a commitment towards using New Homes Bonus generated by new developments to help fund Healthcare facilities where there may be funding shortfalls. Furthermore, specific healthcare priorities should be identified for funding through the Greater Norwich Growth Programme (Infrastructure Plan) funded by CIL.

Developing at scale to provide new settlements allows the delivery of essential facilities that not only benefit the occupiers of the new dwellings, but also existing and nearby communities. The receipts that will be generated from the development, will mean that new schools can be built, meeting a need for the surrounding area as part of a comprehensive master plan. This is far more secure than the pooling of planning contributions which often fails to deliver. This will also be the case with countryside environments, health and community facilities and sports and leisure. All of these can be secured as part of a comprehensive plan, which due to the certainty created by the planning system, through some form of development company or corporation, the involvement of long term patient investment and avoiding the most expensive land adjacent to towns and cities, can ensure that these will be provided.

This will also be the case with local transport links and infrastructure, which benefit the wider area, but can also enhance existing infrastructure, such as rail and public transport facilities. They also create an opportunity to provide sufficient quantum of development to support existing employment, create new employment areas and also support training, again for the wider area.

How should Greater Norwich grow?

Existing Housing Commitment
<p>8. Is there any evidence that the existing housing commitment will not be delivered by 2036?</p> <p>The existing housing commitment, which comprises allocations in the Joint Core Strategy (JCS) and sites with planning permission, is substantial at 35,665 homes. There has been a track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current JCS. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area. Although at this stage we are not putting forward evidence that the commitment will not be delivered by 2036, we do believe that it should be treated with caution and it is therefore essential that an adequate buffer is added to the housing requirement figure in order to mitigate both under delivery of the commitment and of new allocations.</p>
The Growth Options (options on pg.39-40)
<p>9. Which alternative or alternatives do you favour?</p> <p>We broadly support Option 3 ‘Supporting the Cambridge to Norwich Hi-Tech Corridor’ with some variations. These variations relate to the overall level of housing proposed, which we consider should be within the region of 11,000 – 14,000 new homes rather than the 7200 set out within the Growth Options Document. The reasons for the additional requirement are set out in our answers to questions 4-6 above.</p> <p>In order to accommodate the additional numbers, Growth Option 3 should be amended as follows:</p> <ul style="list-style-type: none"> • Provision of circa – 2000 units to a new settlement within the plan period (more to follow post 2036) • Allocation of additional brownfield sites within Norwich City if available options can be identified. • Allocation of additional no’s (circa 1000 units) to the north-east on smaller sites to provide short term delivery in this area to supplement larger growth triangle sites where delivery rates have been slow to date and to help provide City Deal housing requirement in association with employment growth around the airport. • Any remaining requirement to be split proportionally between other locations identified under option 3. <p>The reasons why we consider Option 3 ‘Supporting the Cambridge to Norwich Hi-Tech Corridor’ (as amended) to be the best option for future growth to 2036 are as follows:</p> <ol style="list-style-type: none"> 1. This option would ensure that the proposed housing growth is closely aligned with the ambitions of the New Anglia LEP Strategic Economic Plan which aims to deliver

economic growth in identified Growth locations including Greater Norwich to build on the City Deal and within the A11 corridor. These locations are identified in the Strategic Economic Plan because they host high impact sector activity and are expected to grow over the plan period. There is a recognition within the plan that *“the northern part of the corridor has strong potential to develop its advanced manufacturing sector with a focus on Hethel Science and Technology Park and Snetterton.”*

The Growth Options document recognises that *“The A11 corridor is a major focus of growth, with the route providing key strategic access to London, Cambridge and much of the rest of the UK. The Cambridge-Norwich Tech corridor initiative aims to boost economic development”*. The document sets an indicative target to provide around 45,000 jobs 2015 -2036 (para 4.12 of Growth Options Document) and proposes that the Greater Norwich Local Plan should aim to deliver forecast jobs growth plus additional growth which is consistent with evidence and the City Deal agreement with Government. Option 3 will provide the best support to enable the jobs potential of the Hi-Tech corridor to be realised in addition to jobs growth associated with the city centre, NRP and airport.

2. Option 3 provides the opportunity to focus significant growth in an area which could effectively create an extension of the Cambridge, Milton Keynes, Oxford corridor, which will be the subject of significant investment. In order to compete effectively with and benefit from the Cambridge regional growth, this option is essential.
3. Growth Options 1-3 have been scored the same within the Interim Sustainability Appraisal and perform significantly better in sustainability terms than options 4 -6. Options 4-6 should be discounted as least sustainable. The provision of adequate infrastructure and services to support new housing is extremely difficult under dispersal options and the increased level of public opposition to numerous dispersed sites that may not be properly served by infrastructure and services should not be underestimated. This is not to say that there should be no dispersal, however. Where smaller sites in towns and villages can bring community benefit or help the viability of existing services and facilities, this should be supported. We consider that option 3 provides the right level of dispersal without making this the focus of the growth strategy.
4. There are some similarities between option 2 (Transport corridors) and Option 3 (supporting the Cambridge to Norwich Hi-Tech corridor) as both are focused upon Transport routes. There are, however, significant advantages in choosing option 3 over option 2 as it would enable housing development and investment to be focussed in a core area that has the potential to generate significant employment in line with the Strategic Economic Plan objectives. This is a sustainable approach because it provides homes close to where the jobs will be created. This area also has the potential to benefit from funding sources through the LEP and Central Government to help deliver the Strategic Economic Plan objectives for the High-Tech corridor. Putting more

development in other transport corridors as proposed under option 2 would disperse development further, would be unlikely to benefit from the same funding streams and has less potential for job creation and contribution to the local economy. There is also a danger that locating housing on key transport corridors will only add to existing commuting into Norwich, where the majority of employment opportunities are located. A new settlement within the Hi-Tech corridor under option 3 can provide new homes close to new jobs and enable a planned approach towards infrastructure provision linking into various funding streams.

Option 1, (concentration close to Norwich) obviously scores well in sustainability terms but is very much a repeat of the existing Joint Core Strategy. There have been significant issues with delivery of the JCS numbers, particularly in certain areas and a repeat of this is not a desirable outcome. To accommodate the majority of the required housing numbers within an option 1 scenario would require significant additional pressure being placed upon Norwich Policy Area towns and villages, and the urban fringe, that are already experiencing high levels of growth under the JCS. As our evidence suggests that in the region of 11,000-14,000 new homes are required rather than the 7200 specified in the Growth Options Document, there is a need to find sites for significantly more homes than currently presented under this option. Although there may be scope to find some more suitable brownfield sites within Norwich, it is not considered that there is sufficient capacity under this option to accommodate all of the growth requirement without having an adverse impact upon the character of fringe settlements, as well as increased pressure on infrastructure and services.

The additional benefit of Option 3 is that as well as directing significant growth to a corridor that can bring valuable benefits in terms of Hi -Tech job creation, the development of a new settlement based upon garden village principles will have less impact upon existing towns and villages than too many bolt on urban extensions that do not always provide the required level of infrastructure and facilities.

5. We consider that the 11,000-14000 homes required would be best accommodated by growth Option 3 that provides for a new settlement in the right location to help deliver on economic growth objectives as well as providing a sustainable level of additional growth to Norwich, its fringe settlements and other main towns and villages.
6. We understand that there may be some nervousness regarding the ability to realise the delivery of a new settlement to garden village principles under this Growth Option bearing in mind that this would be a new approach in this area. However, we believe an ambitious strategy is necessary to ensure a prosperous future for the area, which also respects the key characteristics of Greater Norwich. Promotion of a new settlement offers a high level of local authority engagement in the development process to ensure that there is the correct framework in place for long term investment for required infrastructure and to ensure that the completed development is vested with the local

community and there is sufficient long-term income flow to ensure long-term stewardship. There is considerable support for new settlements at a national Government level and we believe that this is a deliverable model.

Our site-specific representation in support of a new settlement based upon Garden Village principles at Hethel in the Cambridge to Norwich Hi-Tech corridor provides additional evidence which supports Option 3 as the most appropriate Growth Option and should be read in conjunction with the answer to this question.

10. Do you know of any infrastructure constraints associated with any of the growth options?

As set out in our answer to Question 7 inevitably with any significant housing and employment growth there will be supporting infrastructure requirements. It is essential that these are properly planned for at the outset.

When reviewing the 6 growth options, the delivery of infrastructure by dispersal options becomes difficult. We believe that dispersal Options 4,5 and 6 provide significantly more constraints than Options 1-3. This is discussed in our background papers.

We consider that Option 3 which includes a new settlement in the Hi-Tech corridor provides infrastructure opportunities. By planning at scale, there is an opportunity to not only provide high quality housing, long term stewardship and land value capture, but also to understand the needs of the wider local area, which through a Development Corporation or local development agreement, can mean that the local authority is at the heart of the development process, providing leadership, but also reassurance around delivery. New settlements can ensure a range of local facilities and infrastructure, for example, this could lead to the provision of new and improved school provision, including a new High School which could serve the new settlement and Wymondham, and also grasp the opportunity for Further Education, potentially linked to the Hethel Technology Park.

Planning at scale by way of new settlements enables long term funding streams to provide infrastructure needed for the occupants and the wider area. This can be linked with existing employment centres.

Dispersal options and even urban growth can link into existing infrastructure, however as set out in our background paper, small development schemes can only provide new facilities and infrastructure through the pooling of contributions, arising from the development of the most expensive real estate. This means that there is often not the scheme viability to make significant contributions and pooling contributions can often be insufficient. They therefore, frequently have limited impact at the local level.

As such, other than meeting specific local needs, dispersal should only be supported for a proportion of the growth, but not the main strategic focus. New settlement planning, can

ensure that there is a planned approach for infrastructure, linking into various funding streams and greater control over housing trajectories.

11. Are there any other strategic growth options that should be considered?

Glavenhill Strategic Land support Growth Option 3 with amendments for the reasons set out in our response to Question 9 above. We do not consider that it is necessary to consider any other strategic options.

12. Do you support the long-term development of a new settlement or settlements?

It is Glavenhill Strategic Land's submission that a programme of new settlements is the best way to help bring forward the objectives contained within the GNLP. We believe that the text at 4.58 to 4.63 of the Growth Options document and the accompanying New Settlements Topic Paper, which is limited in scope, have failed to understand the benefits of such an approach. The barriers identified in this text, such as infrastructure delivery, should not be seen as prohibitive, as planned new settlements can create certainty for income streams and patient investment, to secure the required infrastructure and wider improvements. Therefore, in support of our submission, we provide our own background topic paper reflecting on expansion of existing and new settlements.

We have the strong view that new settlements should be at the heart of the strategic growth plan for the Greater Norwich area, linked to the Cambridge Norwich Tech Corridor and the wider Oxford Milton Keynes Cambridge corridor. Our background paper sets out the benefits of new settlement planning, which has also been set out in our previous responses.

There is a fantastic opportunity for the delivery of great new places in the most sustainable manner, by a careful site selection process that looks at available land that is deliverable, with willing landowners and linked to existing employment areas, transport infrastructure in locations that minimise harm. Hethel offers just such a location; the site is under the ownership of one landowner, is physically linked to the existing hi-tech employment area at Hethel and provides easy links to the A11, Wymondham rail station and existing services in Wymondham to support the new village in its early stages of development.

A series of new settlements has been part of the approach taken to secure the long-term growth of Cambridge, which has seen this becoming a major national commercial hub and we believe that this will provide certainty to local authorities and developers. Furthermore, by supporting a

new settlement at Hethel, it will protect existing towns from sprawling growth, which can be harmful to their character and context.

New settlements can be part of a long-term plan where trajectories can be agreed and local authorities play a crucial role in ensuring that the development proceeds in line with a series of core values and principles, linked to good governance, long term stewardship and infrastructure funding.

Overall, we believe that this is the only approach to secure the certainty, level of investment and infrastructure needed to achieve the aims and aspirations of the Plan and which has the capacity to accommodate the housing requirement of 11,000 – 14000 (see our response to Qu. 4) in a sustainable manner.

Green Belt

13. Do you support the establishment of a Green Belt? If you do, what are the relevant “exceptional circumstances”, which areas should be included, and which areas should be identified for growth up to and beyond 2036?

We do not support the establishment of a Green Belt. This would only serve to push the required housing numbers further into the countryside in order to achieve a protected area around Norwich. This would be unsustainable because it would increase the length and number of journeys into the city and would be likely to have a greater environmental impact on countryside locations.

Norwich City Centre Defining the City Centre Area

14. Should the area defined as the city centre be extended?

Strategic City Centre Policy

15. Do you support the approach to strategic planning for the city centre in 4.80 above?

City Centre Offices

16. What should the plan do to reduce office losses and promote new office development in the city centre?

Retailing

17. What should the plan do to promote retailing in the city centre?

Leisure and Late Night Activity Zone

18. Should the focus for late night activities remain at Riverside, Prince of Wales Road, and Tombland, or should a more flexible approach be taken?
City Centre Housing
19. What should the plan do to promote housing development in the city centre?
Cultural, Visitor and Education Facilities
20. How can the plan best support cultural, visitor and educational uses in the city centre?
Remainder of the Norwich Urban Area and the Fringe Parishes
21. Do you support Option UA1 for the remainder of the urban area and the fringe parishes?
Main Towns
22. Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?
Settlement Hierarchy
23. Do you agree with the approach to the top three tiers of the hierarchy? Yes, this is supported.
24. Do you favour option SH1, and are the villages shown in appendix 3 correctly placed? Glavenhill Strategic Land favours option SH1 which promotes the continuation of the current approach i.e the level of growth that is to be apportioned to different settlements should respond to their scale and their number and range of services. Glavenhill Strategic Land is supportive of the recognition given to the roles played by Key Service Centres and Services Villages in the settlement hierarchy within paragraphs 4.113 and 4.114 of the Growth Options Document. Glavenhill Strategic Land agree that growth should be apportioned to these settlements in accordance with their position within the settlement hierarchy and with the aim of promoting sustainable forms of development. Glavenhill Strategic Land are cognisant of the fact that in some rural areas, villages may share services and that through doing so, may be considered sustainable places for growth.

However, for the reasons set out below Glavenhill Strategic Land consider it inappropriate to 'group' the settlements in tiers 4 to 6 of the hierarchy into a single tier to reflect this relationship.

25. Do you favour the Village Cluster approach in option SH2?

Glavenhill Strategic Land do not support the village cluster approach set out in option SH2 of the Growth Options Document.

Grouping Service Villages with other smaller villages and rural communities will, in Glavenhill Strategic Land's view, result in the differences between settlements i.e. their respective suitability to accommodate additional growth, to be 'masked'.

Glavenhill Strategic Land recommend that the existing 6 tier hierarchy be retained (as per Option SH1 of the Growth Options Document) but suggest that it would be appropriate for strategic policies relating to the distribution of new housing within the Local Plan to make reference to the inter-dependency of lower tier settlements.

A settlement's sustainability and appropriateness to accommodate growth as a result of either its own service provision, or its reliance upon services located within other settlements, should be considered within the Local Plan's Sustainability Appraisal and the results reflected through the allocation of specific housing sites.

At this stage, without detailed information on how the cluster approach is intended to work, we believe it has the potential to push development to the least sustainable locations in the cluster and does not provide for certainty for rural villages in terms of knowing where development would go and how to forward plan the infrastructure.

25a. What criteria should be used to define clusters?

25b. Which specific villages could form clusters?

25c. How could growth be allocated between villages within a cluster?

The Influence of the Norwich Urban Area

26. Do you support a Norwich centred policy area and, if so, why and on what boundaries?

<p>Section 6 – Topic Policies</p> <p>The Economy</p> <p>The Supply of Employment Land</p>
<p>27. What option or options do you support? (refers to options on pg.71-2)</p>
<p>28. Which allocated or existing employment sites should be identified as strategic sites and protected?</p>
<p>29. Are there employment areas that should be identified as suitable for release for residential uses?</p>
<p>30. Are there any new employment sites that should be allocated?</p>
<p>Accommodating Expenditure Growth</p>
<p>31. Should the position of any of the centres in the retail hierarchy be changed?</p>
<p>32. Do any of the existing retail centres have scope to expand to accommodate further floorspace?</p>
<p>The Rural Economy</p>
<p>33. What measures could the GNLP introduce to boost the rural economy?</p> <p>The new garden village scheme at Hethel is designed to facilitate the Norwich to Cambridge A11 growth corridor economic strategy by providing:</p> <ul style="list-style-type: none"> ▪ a workforce living within the immediate area, ▪ quality employment opportunities for the rural area, ▪ space for growth of hi-tech employment and linked education facilities, ▪ leverage for additional investment to the Cambridge-Norwich Hi-tech corridor. <p>Delivering a new garden village in the hi-tech corridor in a location that is accessible to Norwich, Wymondham, Easton Food Enterprise Park, Lotus and the Hethel Engineering Centre and the Norwich Research Park will provide future residents with diverse employment opportunities. Furthermore, new smart technologies, engineering, data and ed-tech educational facilities within the garden village could provide new and existing businesses with the bespoke education, skilling and re-skilling they need to grow and expand.</p>

Glavenhill Strategic Land are acutely aware that the highly successful economic strategy associated within the initial growth phases at Milton Keynes didn't happen by accident. Hethel garden village will require a focused long-term business growth strategy and this approach could be funded by the land capture model for the new settlement which is deliberately designed to be at a scale where the land capture model can work as an engine of growth to attract new business and drive investment and opportunities into the surrounding rural areas. Access to this new economic opportunity for the rural area will be delivered by investment in new public transport infrastructure, communication, education and fibre connections.

The land capture models being proposed at Hethel could assist in funding the expansion of Hethel Engineering Centre directly delivering new jobs and work spaces. The aim is also to create a new Ed-tech school at Hethel that will be funded by the new settlement (such as that proposed at the Renault sponsored Leerpark school in Holland). A new 0-19 years education facility will take the pressure off existing schools in Wymondham and Hethersett and could capitalise on future further education opportunities.

The flow of revenue through the land capture models and from the asset owning parts of Hethel garden village could also be used to invest in health care, community policing, smart technologies, civic realm, community spaces and youth. A specific aim is that the new settlement will speculate by providing subsidised employment spaces for the young to create a new generation of young entrepreneurs within the rural area.

Access and Transportation

Strategic Transport Issues

34. Are there any other specific strategic transport improvements the GNLP should support?

The proposed allocation site is ideally located adjacent to the A11 corridor, along the B1135 which connects the A11 to the Hethel Engineering Centre and the Group Lotus site.

The junction of A11/Browick Road is junction is a grade separated dumb-bell junction, which in accordance to DMRB Vol 6 Section 2 Part 3 TD 16/07 Section 6/2 that it can potentially accommodate any two-way AADT on any approach.

Informal consultation with Highways Engalnd has confirmed this, and also HE have confirmed that there are currently no capacity issues at this junction.

Located close to Wymondham, the proposed site would benefit rom the Norwich – Cambridge Rail line, and also the proposed BRT route from Wymondham to Norwich. Exploration of extending the BRT route can be undertaken.

The use of smart technologies, and Automotive Vehicles will also be explored as will the facilitation of electric vehicles.

Promoting Healthier Lifestyles, Sustainable Travel Choices and Greater Accessibility to Broadband

35. Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area?

The promotion of smarter travel and smart technologies will be integral to the proposed new Garden Village, encouraging, promoting and facilitating smarter travel options and modes. To facilitate this a comprehensive green infrastructure network facilitating walking and cycling and potential AV's will be explored providing connectivity within and around the development but also connecting to Hethel Engineering Centre and Wymondham.

To promote and facilitate smarter choices, early development with BT Openreach will be undertaken to ensure broadband and communication networks and requirements are integral to the early phases of the development.

Design

Options

36. What approach do you support for promoting good design of new development?

We consider that Option DE1 to broadly continue with the existing design and density policy approaches with some relatively minor changes and updating is appropriate. This approach will support good design. Setting more prescriptive design and density policies is likely to be difficult to achieve across such a large and diverse area and should be approached with caution. Setting a policy that satisfactorily deals with city centre apartment sites as well as rural infill sites both in terms of density and design may create more problems than it solves. We consider that a broad policy is more appropriate and that individual site allocation policies could set more prescriptive site-specific requirements, backed up by Development Management Policies in each of the Districts and the City.

Housing

Minimum Affordable Housing Threshold

37. Which approach to affordable housing thresholds do you prefer?

We favour option AH2 that requires only affordable housing on sites of 11 or more dwellings in line with current and expected Government guidance. We object to option AH1 for the same reason.

Application of Affordable Housing Percentage Requirements on Sites

38. What approach do you favour for affordable housing percentages? (refers to options on pg.87)

We consider that the simpler the affordable housing policy is, the more likely it is to deliver required affordable provision across the Greater Norwich area and to speed up the planning process by eliminating lengthy negotiations on site viability. The affordable housing target for Greater Norwich has not been met on annual basis for the past 5 years at least. It would be interesting to know what the average affordable provision has been across all sites greater than 10 units since adoption of the JCS. It is certainly not 33% as per the aim of the JCS policy. It is noted that paragraph 6.8 of the Growth Options Document states that “seeking less than 27% affordable housing on all sites above the qualifying threshold risks under-delivery of overall affordable housing targets”, but under delivery of targets is already happening, even with a higher % target. Lowering the target, could actually increase delivery of all housing types.

We consider that if a realistic % of circa 20% was set across all sites above the qualifying threshold, it would eliminate the need for viability challenge except in very exceptional circumstances and would give developers the certainty they need to be able to get on and secure planning permissions for schemes at a viable level. This would eliminate significant delay and cost in the planning process associated with lengthy heads of terms and S106 negotiations and would enable developers to get on and deliver the housing on site. At the present time, the affordable housing levels are frequently a major hindrance to securing timely delivery of both private market and affordable housing

Tenure Split for Affordable Housing

39. Do you support the favoured option for tenure split?

We object to a one size fits all tenure split approach. It is considered that tenure split should be considered on a site by site basis depending upon local need and upon what Registered providers want to provide and can fund

Rural Windfall, Exception Sites and Small Sites

40. Which approach do you think should be taken to rural windfall and exceptions sites? (refers to options on pg.89-90)

We consider that Option AH7 to allow small scale windfall sites adjacent, or close to settlements with development boundaries is appropriate. These sites should be subject to a criteria-based policy to ensure that they are only permitted where they are acceptable in terms of impact on

form and character, landscape setting of the village and are immediately adjacent to settlement boundaries. We consider that where such sites are permitted they could provide for a proportion of self-build plots where there is an identified requirement in the location.

Given the sometimes irregular shape of settlement boundaries in villages we would propose that “close to” be incorporated into the policy.

Housing Mix – Relative Ratios of House Sizes by Bedrooms

41. Which approach to the mix of housing do you support? (refers to options on pg.92)

We support option AH10 and object to option AH9 as described on the basis that the market will always dictate housing mix delivery based on a known existing demand in each District. Any attempt to apply a blanket housing mix across the entire GNLP area will only serve to frustrate housing delivery and repeat the mistakes of the past that have resulted in missed housing targets and a rolled-up housing need. An overly prescriptive policy is not going to assist in meeting housing delivery targets for any house type.

Housing with Care, Extra-Care Housing and Retirement Housing

42. Which approach or approaches to housing for older people and care accommodation do you favour?

Houseboats

43. Which of the reasonable alternatives for houseboats do you favour?

Gypsies and Travellers

44. Which policy approach do you favour to planning for the needs of Gypsies and Travellers?

45. Are there any suitable sites for Gypsy and Traveller accommodation you wish to submit?

Travelling Showpeople

46. Do you support the favoured option for planning for the needs of Travelling Showpeople?

47. Are there any suitable sites for Travelling Showpeople accommodation you wish to submit?

Residential Caravans/Park Homes
48. Do you support the favoured option for residential caravans and park homes?
49. Are there any potential locations for new/expanded residential caravan sites that you wish to propose?
Climate Change
50. Do you support the favoured option for climate change policy?
Air Quality
How Should Air Quality be Covered in the GNLP?
51. Which approach do you favour for air quality? (refers to options on pg.104-5)
Flooding
How Should Flooding and Flood Risk be Covered in the GNLP?
52. Do you support the favoured option for flood risk policy?
Nature Conservation, Green Infrastructure and Habitats Regulation Assessment Mitigation
How Should Nature Conservation and Green Infrastructure be Covered in the GNLP?
53. Which option do you support? (refers to options on pg.111)
<p>Glavenhill Strategic Land supports a variation of option NC1 where specific housing, employment and a new garden settlement in the Cambridge-Norwich hi-tech corridor are chosen to deliver large areas of strategic green infrastructure. My clients have already made detailed representations promoting a number of sites at Rackheath, Salhouse, Barford, Caistor St Edmund, Mulbarton and Hethel (the new garden village site) to deliver a network of new large green spaces including Country Parks linked to housing and new settlement delivery.</p> <p>Glavenhill Strategic Land considers that the blanket application of option NC1 as an enlarged fixed open space requirement to be delivered on all new housing sites regardless of location, context, scale and viability will not deliver the quantum, or quality, of strategic green infrastructure needed to meet existing shortfalls or offset the impact of planned new housing growth on the Natura 2000 sites (including the Norfolk and Suffolk Broads) quickly enough. This over-and-above requirement will only serve to frustrate development on viability grounds. Furthermore, this new dispersed network of extra green space on housing sites in conjunction with Whitlingham County Park will also not be sufficiently attractive to mitigate against the inevitable recreational impacts of new growth on the North Norfolk Coast SAC, SPA and Ramsar,</p>

The Broads SPA and Broadland SPA and Ramsar. This is evident through the on-going application of a similar extra green space policy in Broadland District Council area that is doing very little to meet overall open space targets/existing deficiencies within the Norwich Policy Area.

We further consider that the pooling of offsite payments as proposed under option NC2 will also not work for the same reasons. The problem being that land on the edge of existing urban areas where sustainable growth is being focused has clear hope value and is therefore typically not for sale for low-value open space and recreation uses.

The clear and obvious way forward is to select specific housing sites as a focus for growth around the City of Norwich that are sufficiently large to accommodate this shortfall and open space requirement and to make open space delivery (quantum, type, equipment required and phasing) a requirement of the allocation in order to provide meaningful Green Infrastructure.

I would direct you to my clients' previous representations submitted in response to the previous call-for-sites and the accompanying Supporting Representation document entitled Green Infrastructure Strategy dated July 2016 that outlines a comprehensive delivery strategy.

54. Do you think any changes should be made to the Green Infrastructure network?

In line with Glavenhill Strategic Land's previous representations we consider that changes need to be made through an expansion of the existing Green Infrastructure network around Greater Norwich. We favour an alternative approach focused around the deliver new large housing allocations enabling the linked delivery a network of new County Parks as a properly costed requirement of development. We have assembled a number of sites in the following locations that are fully costed and can deliver the following as dedicated mixed-use allocations:

- Barford (circa. 150 dwellings delivering 29 ha);
- Rackheath (circa. 300 dwellings delivering 32 ha);
- Salhouse (circa. 90 dwellings delivering 7 ha);
- Hethel (circa. 2000 dwellings as a new garden village delivering 73 ha);
- Mulbarton (circa. 180 dwellings delivering 10 ha); and
- Caistor St Edmund (circa. 300 dwellings delivering 24.5 ha).

This linked housing and new strategic green infrastructure approach will deliver circa 175.5 ha of new green infrastructure and open recreational spaces in the form of Country Parks for public use. The County Park locations have been selected as they are all on main road corridors, on the edge of existing sustainable growth settlements and are also accessible to walking, cycling and public transport. See our previously submitted Green Infrastructure Paper for further information.

This smart approach to meeting growth and open space requirements will allow people (both existing and future residents) to live healthier lives in locations that they don't feel the need to escape from at the weekends to reduce the impact to the Natura 2000 sites and on-going and increasing costs to the public purse.

Landscape

Landscape Character and Protection

55. Which of these options do you favour? (refers to options on pg.115)

Glavenhill Strategic Land understands the need to protect sensitive landscapes and river valleys but these landscapes are generally subject to existing other levels of protection. We also understand the need to prevent coalescence between existing settlements to protect townscape character and to enable resident populations to have direct access to countryside recreation and benefits. Nevertheless, we object in the strongest possible terms to approaches outlined in options LA1 and LS2 especially the protection of the route of the NNDR that has no real landscape merit (one of the key reasons the route was selected and evidenced in the original submission documents) and is designed to facilitate access to new future planned growth areas.

Both approaches favour the blanket application of Green Belt-type constraint policies for no valid landscape and/or planning reasons when (due largely to a lack of brownfield land supply within the City) the outward expansion of Norwich into the fringe parishes is inevitable. Indeed, the current growth strategy for Norwich as contained in the adopted Joint Core Strategy acknowledges that the Norwich Policy area that is the countryside beyond the existing urban edge is the most sustainable location for new housing and employment growth.

Glavenhill Strategic Land favours a new option that seeks to deliver a proper planning approach to development and one that allocates sufficient deliverable and viable housing and employment sites to meet real-time needs (including City Deal growth requirements) rather than the current strategy that seeks to underprovide for all the wrong reasons. This is the most appropriate way to take the development pressures off the higher value fringe parishes beyond the outer edge of the City.

Strategic Gaps

56. Should the GNLP protect additional Strategic Gaps and if so where should these be?

Glavenhill Strategic Land does not agree that new Strategic Gaps are required within the Greater Norwich Local Plan area to separate existing settlements. This is because similarly worded

countryside policies already acting as development constraints already exist and this type of quasi-Green Belt-type policy is not required.

Energy

57. Should option EN1 be included in the GNLP?

Water

58. Do you support option W1?

Communities

Location of Affordable Housing within Sites

59. Do you support option COM1 for the distribution of affordable housing?

Health Impact Assessments

60. Which option do you support? (refers to options on pg.123)

Neighbourhood Planning

61. Do you support option NP1? If so, which GNLP policies should be “strategic”?

Culture

How Should Culture be Covered in the GNLP?

62. Which option do you support? (refers to options on pg.126-7)

The Broads

63. Do you support option BR1?

Section 7 – Monitoring the Plan

Monitoring of the GNLP

64. Are there any current indicators that should be excluded or included in the GNLP monitoring framework?

The existing indicators on which the JCS is monitored are considered appropriate to carry forward. Additional indicators that should be included are:

- the proportion of housing delivery that is happening on the allocated sites. At the present time a significant provision of delivery is taking place on 5-year land supply and

windfall sites. The proportion taking place on the allocated sites is not understood. In order to assess how effective the plan is, it is considered that this measure is essential.

- the provision of self-build plots, particularly if Policy Option AH7 is drafted to include provision of self-build plots.
- the delivery of private and funded care beds in the plan area as there is a significant need for these to be provided.

Shortfall in Housing Land Supply

65. Which option do you support? (refers to options on pg.131-2)

We note the policy Option HLS1 to allow the most appropriate HELAA sites to come forward if there were no 5-year land supply. We are concerned that this approach will be difficult to put into practice. If this approach is taken it will presumably be based upon the development hierarchy but how will locations be prioritised between South Norfolk and Broadland in particular? The level of assessment of HELAA sites is minimal and the onus is on the Councils to undertake this rather than the landowner/developer. It will be difficult to prioritise sites based on limited assessment information, in locations where there are multiple sites available. How will this process be undertaken in a fair and transparent way outside of the Local Plan process? It is therefore questionable whether this approach would actually provide a simpler and quicker process than Option HLS2.

We consider that Option HLS2 requiring a short, focussed review of the local plan to allocate more deliverable sites is the only reasonable approach because it is fair and transparent. This also places the onus upon the promoter to provide evidence regarding site suitability and delivery. The need for such a review should be kept under continuous review based upon annual monitoring reports. This was the approach recommended by the Inspector in relation to housing shortfall in the Broadland part of the NPA for the JCS and JCS policy 22 was put in place for this purpose, although it is noted this has not been implemented.

Continuing to allow planning permissions on a 5-year land supply basis until the short focussed review has been completed is a reasonable approach and if an appropriate buffer is added to the housing requirement figure during plan preparation (see our response to question 5), then the likelihood of there being insufficient 5 year housing land supply should be minimal in any case.

General Questions

66. Are there any other issues relating to the GNLP you would like to raise?

6. Site Assessment

The New Settlements Topic Paper accompanying the Growth Options Document sets out a list of broad criteria for assessing the suitability of locations for new settlement development. We have used this list as a broad basis for assessing the suitability of the Hethel Garden Village Site and the results are set out below:

New Settlement Topic Paper Criteria for assessment of site suitability	✓ X	Hethel Site Assessment
a) Sufficient land has been submitted for the development of a freestanding garden village consisting of a minimum of 2000 homes, along with a primary school, local employment, green infrastructure and a local retail centre.	✓	Yes, this site comprises 351 hectares of land suitable to accommodate in the region of 5160 homes. We suggest that 2000 new homes could be provided within the plan period to 2036 with a further 3160 to follow in the next plan period.
b) The site could have the potential to be expanded in the longer term to provide a larger freestanding community with a variety of services;	✓	Yes, as above, this site could deliver 2000 homes within the plan period and up to 3160 beyond which would enable the creation of a freestanding community with its own range of local shops, health services and schools and community uses.
c) There is easy access, particularly on foot and by bicycle, to primary and secondary schools and an existing range of retail, health and leisure services in an existing settlement to support the early years of development of the community and to provide choice.	✓	<p>Yes, the site is located:</p> <ul style="list-style-type: none"> - 2 miles from Wymondham railway station - 2.4 miles from Wymondham High Academy - 1.5 miles from Browick Road Junior School - 1.9 miles from Wymondham Health Centre - 2.1 miles from Morrisons, Wymondham <p>There is no dedicated footway/cycleway access from the site along Stanfield Road towards Wymondham at the current time but the potential exists to upgrade the route.</p> <p>There are also opportunities to develop comprehensive integrated walking and cycling routes and networks, encouraging sustainable and healthy travel to local facilities such as Burnthouse Lane.</p>

<p>d) Market Interest in providing new settlement scale development in the location can be proved, with clear evidence of the viability and deliverability;</p>	<p>✓</p>	<p>The Promotor is a member of the All Party Parliamentary Group on New Towns and has been able to promote the project at the highest level in Central Government and has been given access to senior people in linked organisations, including Homes England, TCPA, RTPI, MHCLG, leading Housing Groups and newly formed Development Corporations in other parts of the Country.</p> <p>The Promotor has talked to several players in the market place capable of delivering sites such as that promoted at Hethel.</p> <p>They fall principally into 2 groups:</p> <ul style="list-style-type: none"> • Infrastructure Providers • Institutional Funders • There is a third category, but it is basically a combination of the other two. <p>These parties have invested heavily in the provision of significant housing growth, from detailed research to exemplar planning and on to site delivery, including modular construction.</p> <p>Resulting interest has been strong in terms of the site specific proposals at Hethel, notably based on the self-explanatory benefits explained elsewhere in this document.</p> <p>Within the market place, a site of this size and in this location, in one ownership and under the control of a forward thinking promotor is a rare opportunity and one that can lead to successful delivery with support of the Local Authorities.</p> <p>We can confirm that the land deal is structured to deliver the site as proposed and thus state the site is viable and deliverable.</p>
<p>e) There is the potential for high quality public transport access. This could be a bus rapid transit (BRT) route, a high quality bus</p>	<p>✓</p>	<p>As part of the Norwich Area Transportation Strategy (NATS) Implementation Plan, Wymondham is planned to benefit from the expansion of the BRT network for Norwich, via Hethel and Newmarket</p>

<p>route or a railway station with good existing services, or the capacity for a reasonable level of service.</p>		<p>Road. There is potential to expand the route to the proposed site to provide a high quality public transport mode to Wymondham and Norwich, integrating smarter technologies, ticketing and part of a wider travel plan. The grade separated junction of Browick Road and the A11 will assist in this. There may be scope, subject to the size of the development of a dedicated direct BRT route from the site to Norwich via the A11.</p>
<p>f) There is good access to the primary/trunk road network including the A11, A140, A143, A146, A1270 (NDR);</p>	<p>✓</p>	<p>Yes, the site is located on the B1135 with direct access onto the A11 via the Browick Road junction within 1.1 miles of the site.</p> <p>The junction of A11/Browick Road is a grade separated dumb-bell junction, which in accordance with DMRB Vol 6 Section 2 Part 3 TD 16/07 Section 6/2 can potentially accommodate any two-way AADT on any approach.</p> <p>Informal consultation with Highways England has confirmed this, and also HE have confirmed that there are currently no capacity issues at this junction.</p> <p>Once accessed to the A11, the A47 north is approximately 7km to the north, whilst south is Cambridge and then London.</p> <p>Located close to Wymondham, the proposed site would benefit from the Norwich – Cambridge Rail line.</p>
<p>g) There is easy access to strategic employment locations;</p>	<p>✓</p>	<p>Yes, the proposed allocation site is uniquely placed adjacent to the existing Lotus Car Works and the Hethel employment growth area.</p> <p>Policy 9 of the Joint Core Strategy (JCS) identifies land at Hethel (to the immediate east of the proposed allocation site boundary) as a strategic employment location and states that there should be expansion of activity there, including a new technology park to focus on advanced engineering and the growth of technology capabilities.</p>

		<p>The site is allocated under Policy HETHEL 1 and 2 for uses associated with, or ancillary to, advanced engineering and technology based business and will form an extension to existing employment development at Hethel.</p> <p>The allocation at Hethel forms part of a wider regional economic strategy to deliver a 'technology corridor' between Cambridge and Norwich, providing over £500m of innovation-led growth, infrastructure investment, housing and skills.</p> <p>The site is also well placed within 5 miles of Norwich Research Park (NRP) and jobs in Norwich City Centre.</p>
h) The site is in a limited number of land ownerships or there is potential for a legally enforceable land equalisation agreement for a number of landowners to work together;	✓	Yes, the allocation site is within a single land ownership. Glavenhill Strategic Land have a promotion agreement with the landowner which covers the allocation site.
i) There is a commitment to achieving high quality, imaginative and sustainable design and to build the settlement to Garden City principles;	✓	Yes, Glavenhill Strategic Land are committed to the new settlement being designed and built to Garden City principles.
j) The landowner/developer/consortium is committed to having a strong vision and to ongoing community engagement;	✓	Yes, Glavenhill Strategic Land is committed to this approach.
k) There is a commitment to working with the Councils to sign a legal agreement to establish a delivery vehicle, to invest much of the uplift in land value into infrastructure on-site, to community ownership of land and a long term commitment to stewardship of assets;	✓	Yes, Glavenhill Strategic Land agree that this approach is fundamental to the delivery of a new settlement to Garden Village Principles. See our Background Paper, Appendix 2 for further details.

<p>l) The site will provide for a broad mix of housing types and tenures including starter homes and opportunities for self-build.</p>	<p>✓</p>	<p>Yes, this can be secured through the detailed wording of any allocation, other development management policies and site masterplanning.</p>
<p>m) The site can support generous provision of open space including a strong Green Infrastructure network that incorporates existing features and provides effective links to surrounding areas:</p>	<p>✓</p>	<p>Yes, the site is 351 ha in size and is capable of supporting generous provision of open space and green infrastructure in conjunction with housing, employment and community facilities. This should form part of the site masterplanning.</p> <p>The site comprises a number of cultivated fields divided by rows of well-established hedgerows and trees. A coordinated approach to landscaping, open space and boundary treatment will be key to assimilating any new development within its surroundings.</p> <p>The site straddles a green infrastructure corridor as proposed by the Greater Norwich Green Infrastructure Study and creation of a new settlement here would present an opportunity to achieve this corridor.</p> <p>See also our response to Qu.52 on Green Infrastructure provision throughout the GNLP area.</p>
<p>n) The site has the potential to be developed without having a negative impact on areas designated for their local, national or international environmental value;</p>	<p>✓</p>	<p>Yes, the site comprises arable farmland with hedgerows, small parcels of woodland, an area of aggregate workings and some parkland. There are no nationally, or internationally designated sites within the boundary.</p> <p>Desktop assessment confirms the nearest Site of Special Scientific Interest is off-site (Lower Wood, Ashwellthorpe SSSI, 450m south-east);</p> <p>There is a County Wildlife Site within the boundary (a woodland north of Stanfield Hall) but this woodland could be retained within the site masterplanning.</p> <p>The priority habitats present within the site are grazing marsh and deciduous woodland;</p> <p>It is considered that the site can be developed without a negative impact on areas designated for their local, national or international environmental</p>

		value. This can be confirmed through on-site ecological assessment if there is a firmer commitment given to pursuing a new settlement in this location.
o) The site will not be subject to conflicts with existing uses which could not be readily mitigated;	✓	The allocation site is located next to Hethel Engineering Centre where Lotus have a test track. There is the potential for noise levels from the test track to impact upon residential amenity if residential properties are located too close to the track. However, due to the large size of the site, it is considered that satisfactory mitigation can be achieved through site masterplanning to achieve the necessary stand off distance for residential properties from the track. The details of this can be confirmed through a noise assessment if there is a firmer commitment given to pursuing a new settlement in this location.
p) The site would minimise the use of high quality agricultural land.	✓?	The site comprises Grade 3 good to moderate) agricultural land (Grade 1 is excellent and Grade 2 is very good). The sub classification of Grade 3 into a) and b) classes requires further assessment.
q) There are limited flood risk areas and the site could readily be designed to increase permeable surfaces;	✓	<p>The majority of the allocation site is located in Flood Zone 1 on Environment Agency Maps and is at low risk of flooding from rivers or the sea. There is a limited area within flood zone 2 and 3 confined to the banks of the River Tiffey in the southern portion of the site where development would be constrained. However, this would not impact upon the delivery of anticipated site numbers.</p> <p>The Environment Agency maps show some potential for surface water flooding within the site and an appropriate drainage strategy would need to be designed to address this. This will constrain development in certain parts of the site but can be combined with provision of green infrastructure and is not considered to impact upon the delivery of anticipated site numbers.</p>

<p>r) The site would not have a negative impact on defined heritage assets;</p>	<p>?</p>	<p>The area to the north of the B1135 borders Stanfield Hall which is Grade II* Listed. There are a number of other listed buildings within the vicinity. The Hall and its curtilage are located outside of the proposed allocation area, albeit given its location, specific attention would need to be given as part of any allocation and masterplanning process to protecting and where possible enhancing, the setting of the Hall.</p> <p>Heritage impacts and necessary mitigation can be confirmed through a heritage assessment if there is a firmer commitment given to pursuing a new settlement in this location.</p>
<p>s) Development of the site would not lead to the sterilisation of mineral assets.</p>	<p>√?</p>	<p>Part of the site lies within a mineral safeguarding area for sand and gravel. Minerals Core Strategy Policy CS16 states that sand and gravel resources are not as nationally important and scarce as silica sand but cautions against proven mineral resources being “needlessly” sterilised by non-mineral development. The minerals planning authority will need to be consulted on development in this area. It is likely that any viable sand and gravel resources on site could be utilised in the construction of the development and the presence of sand and gravel on site will not be an overriding constraint to development.</p>

HELAA Capacity Assessment

The HELAA capacity assessment December 2017 has also assessed the suitability and availability of all sites for residential development in broad terms by means of a desk top assessment and advice from a range of technical consultees. It identifies potential constraints to development and/or impacts of developing a site which may need further investigation and additional measures to facilitate development e.g. additional infrastructure or mitigation.

At this stage, Glavenhill Strategic Land broadly agree with the HELAA assessment that this site is **SUITABLE** to accommodate residential development. We do not consider there to be any overriding constraints that cannot be overcome through the design process. Our comparative assessment set out below is based upon desk top analysis of the key issues as set out in the table above. Glavenhill Strategic Land will commission detailed technical assessments on a range of issues from specialist consultants at an appropriate stage.

Constraints Analysis	HELAA Assessment	Glavenhill Assessment
Access	Amber	Green
Accessibility to Services	Amber	Green
Utilities Capacity	Amber	Amber
Utilities Infrastructure	Green	Green
Contamination and Ground Stability	Amber	Amber
Flood Risk	Amber	Amber
Market Attractiveness	Amber	Green
Impacts Analysis		
Significant Landscapes	Green	Green
Townscapes	Amber	Amber
Biodiversity and Geo-diversity	Amber	Amber
Historic Environment	Amber	Amber
Open space and GI	Green	Green
Transport and Roads	Amber	Amber
Compatibility with Neighbouring uses.	Amber	Amber

The above assessments, although high-level at this stage, demonstrate that there are unlikely to be any over-riding constraints to development of the site. Glavenhill Strategic Land are committed to undertaking more detailed technical assessment work on key topics, if there is a firmer commitment given to pursuing a new settlement in this location.

7. Conclusions

The proposed allocation site at Hethel, through its strategic location and scale, presents a unique opportunity to deliver on the ambitions of the Cambridge-Norwich Hi-tech Corridor. The site is capable, through a coordinated and comprehensive approach to site-wide masterplanning, to accommodate up to 2000 homes within the plan period to 2036 together with education and community facilities and a significant amount of new high-tech employment floorspace, open spaces and landscaping in the form of a new Garden Village.

The Garden Village model, provides the opportunity to set up a Development Corporation or local development agreement, to ensure that the local authority is at the heart of the development process to provide leadership and reassurance around delivery. Long term stewardship and land value capture are key to the Garden Village model. By working to this model, the new settlement can deliver new homes and the infrastructure to support them and minimise the impacts of additional housing growth upon established settlements in the Greater Norwich plan area. It is an ambitious strategy that can deliver clear benefits over and above the other growth options.

Allocation this site will demonstrate a long-term approach to securing housing and employment delivery and the required investment to help meet the strategic objectives of the Greater Norwich Local Plan. The certainty of delivery arising from a planned settlement, particularly when this includes leadership from local authorities, will assist investors in making the contribution needed to make the Cambridge-Norwich Hi-tech Corridor a centre for investment and activity.

There are no overriding constraints that would prevent this site from being delivered as a new settlement. It is on this basis that Glavenhill respectfully request that the proposed allocation site be considered for allocation within the Greater Norwich Local Plan.

8. Next Steps

Glavenhill Strategic Land would be pleased to meet with GNLG officers to discuss this exciting opportunity in more detail.

Glavenhill Strategic Land are committed to undertaking more detailed technical assessment work on key topics, if there is a firmer commitment given to pursuing a new settlement in this location.

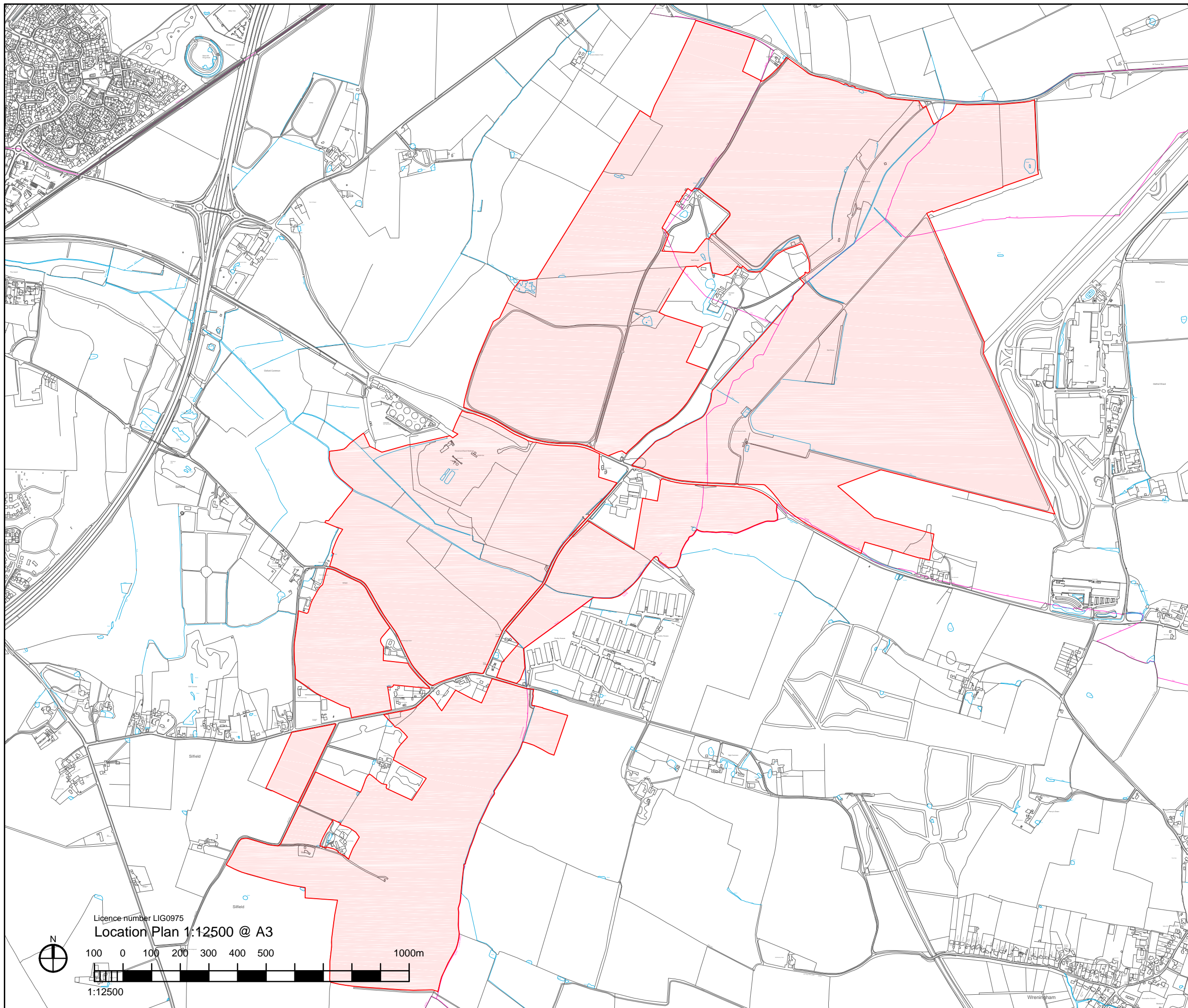
An illustrative concept masterplan showing one way in which the proposed allocation area may be brought forward can be provided to the GNDP if considered of assistance in considering the site's development potential.



Appendices

Site Location Plan Appendix 1

New Settlements Topic Paper Appendix 2



NOTES

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These duties can be found at:

<http://www.hse.gov.uk/construction/cdm/2015/responsibilities.htm>

It is your responsibility as client to make yourself aware of your role within CDM 2015 and act accordingly.

Site Area: 351.46 ha

REVISED BY:	DATE:	CHECKED BY:	DATE:
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PURPOSE OF ISSUE PL - For Planning Submission	RIBA STAGE -
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DRAWING STATUS S2 - Fit for Information

PROJECT TITLE Hethel

CLIENT Glavenhill

DRAWING TITLE Site Boundary Plan	SCALE 1:12500@A3
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DATE March 2018	DRAWN BY SF	CHECKED BY BR	APPROVED BY -
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DRAWING NUMBER			
PROJECT NO 0894P-	TYPE 00	UNIQUE NO - 001	REVISION -



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Location Plan 1:12500 @ A3



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1:12500



**The Extension of Towns and Villages and the Case
for New Settlements**

**Background Paper
March 2018**

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Introduction

As part of the Greater Norwich Local Plan preparation, a Topic Paper has been produced regarding new settlements. This paper put forward the concept of a New Settlement, but didn't go as far as articulating and demonstrating the benefits in the context of delivering growth in the Greater Norwich Local Plan.

This paper has been produced to do just that and furthermore has been produced in consultation with industry leading figures with experience in delivering & managing new settlements, both internationally and in other parts of the UK. There is central Government support for such an approach to support delivery of housing numbers, sustainable communities, exemplar placemaking and to support other growth options as part of a balanced solution to meet needs.

An assumption is often made when formulating Local Plans that there is a choice between either allocating new settlements or expanding existing villages in order to meet growth requirements. There are however complementary aspects to both approaches and they should form part of a suite of approaches and allocations as part of the Local Plan process.

We will briefly review each of these in order to discuss this background paper in more detail.

Extending Existing Settlements

Villages

This approach is to be encouraged when they sustain existing villages, by preserving local facilities and services and providing affordable housing for local people. Development within or on the edge of existing villages can respond to decreasing population as a result of changing household formation trends.

This can be led by Neighbourhood Plans and help protect local schools, Post Offices, public transport, neighbourhood shops and Public Houses, by ensuring that there is an appropriate quantum of local population.

By the provision of local affordable housing, local communities often priced out of the areas that they were brought up and educated can have the opportunity for accommodation.

However, the scale of development arising from the expansion of villages should be carefully considered and is often best constrained by existing village settlement boundaries or within its immediate edges, as part of a planned approach, which understands local need, landscape impact and the socio economic circumstances.

Towns

The approach that a large proportion of authorities have taken over recent years, in order to meet housing requirements, has been to allocate urban extensions as part of the Local Plan process.

When undertaken successfully, they can link into existing services and facilities and also sustain facilities and benefit from existing transport services and employment. When urban extensions are well considered, they can make a positive contribution in terms of meeting need, sustaining local economies and have the potential to create well designed places.

However, the approach that many authorities have taken relying solely on expansion of existing settlements can be flawed and there are a number of examples where large 'bolt on' estates have resulted in poorly considered environments.

Some of the issues of this approach are summarised below:

Coalescence

Expanding existing settlements can often lead to a co-joining of towns and villages. This results in a loss of identity and spacing.

The spacing between settlements not only leads to a visual separation, but also enables an enhanced environment, access to the countryside, leisure, woodland and natural habitats, wildlife corridors and food production. The need for towns and villages to have space around them to breathe by having open land around them is of importance to the quality of life of local communities.

The preservation of the integrity of existing settlements also protects their identity, many of which will be of historic and local importance.

This can be lost by a reliance on urban expansions.

Links to Services

Although expansion of existing settlements can often protect facilities and services, this approach can be counter-productive, with numerous examples of the development of housing estates which provide poor facilities to serve new neighbourhoods. They can be some distance from employment areas, town centres, local schools and services so that they can only be accessed by the car. This can be far from sustainable and lead to a sense of alienation by less mobile residents.

Many of these housing estates are not at a scale to generate direct provision of new facilities, such as community centres and schools, which means that provision relies on using the existing infrastructure or improved or new provision through pooled Section 106 or Community Infrastructure Levy. In principle this approach is sound, but often in practice delivery is stifled by a lack of land to provide this infrastructure and reliant on different agencies. There can also be a lack of certainty when new and improved facilities are implemented and there are countless examples of occupiers in new estates being frustrated by late or no delivery of local infrastructure.

Delivery

One of the issues for local authorities and policy makers is a lack of certainty over the implementation of new housing development. In the current planning policy framework, the grant of planning permission for development does not guarantee delivery and many developments do not come forward in line with local authority trajectories, despite assurances from developers.

The cost of land adjacent to existing towns, where urban expansions will normally take place, is often inflated and therefore the least viable. A large amount of towns have adjacent land which is the subject of option agreements from developers, meaning that land is very expensive, with little opportunity for value capture. This will also restrict the viability of the provision of associated facilities.

Environmental Impact

The environmental impact of expansion of existing settlements, particularly urban expansions can be significant.

Many edge of town locations are often of high ecological value, perform an amenity role, provide access to the countryside and employment, but also incorporate, meadow and woodland or biodiversity rich environments.

These habitats, which may not be designated, can be the home of a range of insects, birds, reptiles, as well as bats, badgers and other protected and unprotected species and their erosion can be harmful.

Conclusions

In order to meet needed growth, the expansion of our towns and villages can make a positive contribution and is often an easy solution for many local authorities.

When these schemes sustain local towns and villages, ensuring important facilities and infrastructure are protected and utilise existing local transport attributes, they can make a positive contribution.

There are however many examples of expansions that have been harmful to the local environment, are poorly related to existing facilities, town centres and employment and created remote and poorly serviced communities and a sprawl of development.

As such, it is our view that as part of a suite of policies and allocations, a new settlement should also be considered.

New Settlements

The reason that garden cities were first introduced in the early twentieth century was to prevent the sprawl of existing settlements, to enable inner city regeneration and to a city based or regional approach to settlement planning and an opportunity to create great places combining the best of town and country.

A series of core principles were promoted by Ebenezer Howard, Thomas Adams and Raymond Unwin in the early twentieth century, which may appear outdated on first examination, but the core values and principles remain valid.

Furthermore, by managing the way that land was disposed and managed, garden city principles sought to capture value from the land and secure long-term stewardship, through community governance models.

It is unfortunate that a lack of aspiration, technical knowledge and strategic approach to planning, along with an absence of political support has meant that since Milton Keynes, there have been few examples of planned settlements in the UK, whilst there are many examples of poor quality urban extensions.

The Greater Norwich Local Plan Topic Paper on New Settlements, is limited in scope and does unfortunately demonstrate a lack of understanding of the potential for new settlements, which is briefly discussed.

Infrastructure and Funding

The delivery of infrastructure is considered to be challenging in the background paper. The mechanisms referred to is the Community Infrastructure Levy, then reference is made powers through a revised New Towns Act.

The control of land and land value is at the heart of the garden city model. There is an opportunity for the local authority to demonstrate leadership to ensure that the new settlement is delivered in accordance with a housing trajectory and with the required infrastructure.

The local authority can work with the land owners and/or lead developer to ensure that governance structures are in place, which will secure delivery. This may mean that the local authority could take a leadership role by using its powers of compulsory purchase to support land assembly and securing the relevant consents. They can ensure that stewardship models will be in place for the completed scheme along with the programme of infrastructure delivery.

The leadership and certainty that the local authority can provide either through supporting land acquisition, helping set up structures such as local development corporations or participating in local community development companies, as well

ensuring that planning permissions are delivered in a timely manner, will help ensure delivery.

There are long term funding streams available to secure delivery of new settlements and infrastructure. Long term funders include pension funds and other financial institutions, who can act as patient investors. This investment relies on certainty, which if the local authorities use the mechanisms available to them, can be secured. In return for this certainty there is the opportunity for long term investment to support the development until receipts can repay loans.

Furthermore, there is central government infrastructure funding available to help support the implementation of such schemes.

It should also be emphasised that by carefully selecting land for new settlement, there is the opportunity to seek more affordable land options, the inverse to the land immediately adjacent to our towns and cities, largely already tied up with developers.

Furthermore, the allocation of a new settlement creates more certainty for long term housing trajectories of delivery far beyond the Local Plan period, creating certainty for the local authority, its stakeholders and investors. This is preferable to relying on creeping sprawl of existing settlements, solely reliant on the commercial housebuilding sector.

Through partnership working the local authority can be reassured that suitable facilitative infrastructure is in place.

Benefits of Planning at Scale

Rather than placing a new settlement on the 'too difficult pile', serious consideration needs to be made of the benefits of a new settlement to the Greater Norwich growth strategy.

A new settlement allows the delivery of essential facilities that not only benefit the occupiers of the new dwellings, but also existing and nearby communities. The receipts that will be generated from the development, will mean that new schools can be built, meeting a need for the surrounding area as part of a comprehensive master plan. This is far more secure than the pooling of planning contributions which often fails to deliver. This will also be the case with countryside environments, health and community facilities and sports and leisure. All of these can be secured as part of a comprehensive plan, which due to the certainty created by the planning system, through some form of development company or corporation, the involvement of long term patient investment and avoiding the most expensive land adjacent to towns and cities, can ensure that these will be provided.

This will also be the case with local transport links and infrastructure, which benefit the wider area, but also can enhance existing infrastructure, such as rail and public transport facilities. They also create an opportunity to provide sufficient quantum of development to support existing employment, create new employment areas and also support training, again for the wider area.

Principles

We have set out that planning new settlements at scale, as part of a wider approach in plan making can lead to certainty of delivery. At the heart of new settlements, must be a series of core values and principles. There is a developing understanding of garden city principles, promoted by groups such as the Town and Country Planning Association that also stem back to Ebenezer Howard. For garden village schemes, the principles that should be applied are in summary:

- Capture of land value for reinvestment
- Community governance
- Long term stewardship
- Community engagement
- Strong local leadership from the local authorities, stakeholders and community
- Exemplary master planning – meeting modern expectations for great place making
- Neighbourhoods with identity and easy access to facilities and transport links
- Community engagement for existing and new communities
- Local infrastructure facilities to meet identified need
- Affordable housing to meet local need, as well as encouraging new dwellers to enhance the local economy
- Sustainable and integrated transport to support a modal shift, whilst providing access to existing employment
- Access to the countryside, enhancing the green network and biodiversity, open space and the provision of local allotments and food growing opportunities
- Strong arts and cultural offer
- Excellent educational provision for all ages
- Sustainable energy and water management systems

If these core values and principles can be at the heart of the discussion regarding new settlements, they can ensure quality places for future generations.

Current examples of where this is being undertaken, include:

North Essex Authorities – where joint working between local authorities will bring forward three new settlements

Bicester – where land value capture and stewardship models are being applied as part of this development

Heyford – where a private developer, Dorchester, is bringing forward a high quality development and has provided a new free school at part of the early development of this settlement.

The Cambridge Example

Cambridge is one of the key growth areas in the UK. This is associated with the science and innovation sector, the University and being a great place to live.

The growth of Cambridge has been linked to transport improvements and a range of high quality employment opportunities and investment.

Strong leadership has been the key to this growth, with combined authorities, LEPs and strong governance at all levels promoting the opportunity that growth represents.

This has secured investment to meet the challenge that growth represents.

In terms of city based master planning, there has been a recognition that the way to meet the required housing and employment has been balanced between growth of the city and a series of new settlements, which can take a direct reference to Howard's social city model.

This has resulted in a series of planned new settlements such as Cambourne, Northstowe and Waterbeach and Bourn. This growth will continue, particularly with the level of infrastructure investment linked to the Cambridge, Milton Keynes, Oxford Corridor.

Through a collaborative approach, with strong planning at its heart, leadership at local and national government level, the economic growth of this region is assured.

Greater Norwich

There are clear lessons for Greater Norwich and opportunities, particularly when we consider the A11 corridor. Of the options included in the consultation document, the principle of the emphasis placed on the **Cambridge Norwich Tech Corridor** is supported. This includes a new settlement which in effect could create an extension of the Cambridge, Milton Keynes, Oxford corridor, which will be subject of significant investment. To assist Greater Norwich in competing effectively and benefitting from Cambridge regional growth, this option is essential.



It makes sense that a new settlement is placed at the heart of the growth strategy in the GNLP. It will demonstrate a long-term approach to securing housing and employment delivery and the required investment to help meet the strategic objectives in the consultation document. The certainty of delivery arising from a planned settlement, particularly when this includes leadership from local authorities, will assist investors in making the contribution needed to make the Cambridge-Norwich Tech Corridor a centre for investment and activity.

Conclusions

The level of growth required to meet local and regional needs requires a planned approach. For too long, this has meant a reliance on expansion of existing settlements.

No doubt, many expansion schemes of towns and villages have secured important services and facilities, employment and provided homes for local people. However, too often these schemes do not provide the required level of infrastructure and facilities and often lead to poorly served and designed bolt on estates.

New settlements present an opportunity for a high level of local authority engagement in the development process, ensuring that high quality and well served place making is secured. This is by acting in a facilitatory role, in setting up governance structures and creating certainty through allocation and planning permissions. By taking this approach and working with landowners and developers, the local authority can ensure that there is the correct framework for long term investment is provided for required infrastructure and structures are in place to ensure that the completed development is vested with the local community and there is sufficient long term income flows to ensure that there is long term stewardship.

There are core values and principles that should form part of these new communities and there are investors and developers keen to see these applied.

The growing need for housing requires a different approach of long term certainty through a more strategic planning approach, which can only be achieved through a considered allocation of a new settlement.