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Submitted via email only: lp@s-norfolk.gov.uk

2nd August 2021

Our ref:
SIL001/HP/MH

Dear Planning,

**South Norfolk Village Clusters Housing Allocations Plan
– Regulation 18 Consultation**

We write on behalf of Orbit Homes (Orbit), J Alston and Sons and Pelham Homes, led by Orbit, regarding the Regulation 18 consultation on the above document. David Lock Associates (DLA) are instructed by Orbit as the master planners and planning consultants for a strategic scale new settlement within South Norfolk, known as Silfield Garden Village (**SGV**).

DLA has engaged at each stage in the preparation of the Greater Norwich Local Plan (GNLP) in respect of SGV. We have previously raised procedural concerns at both the GNLP Regulation 18c (March 2020) and Regulation 19 (March 2021) consultations with regards to the approach of relying on numerous Development Plan Documents (DPDs), including the South Norfolk Village Clusters Housing Allocations Plan (SNVCHP), and our comments below should be read in conjunction with the comments set out previous in the GNLP representations.

Interaction with the GNLP

We wish to maintain our objection to the preparation of the SNVCHP in isolation from the GNLP.

No justification has been given as to why the village clusters allocations for South Norfolk could not be included and considered as part of the GNLP. Indeed, the village cluster allocations for Broadland District are included and allocated as part of the GNLP and the policy framework for the decision to allocate village clusters throughout the Greater Norwich area is set out in policy 7.4 of the GNLP (and therefore there is a logic to include all site allocations justified under GNLP policies, including those in South Norfolk village clusters, within the GNLP itself).

The decision to separate the analysis and decision making for South Norfolk Village Cluster allocations from the remainder of the GNLP is both confused and unjustified. Given the close working

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relationship between both Councils – including a shared website and consultation platforms for the local plan – nowhere in the consultation material does it state the reason for the separation of South Norfolk village cluster allocations from the remainder of the local plan.

The preparation of the SNVCHP in isolation gives rise to a number of plan-making and procedural concerns:

(i) Transparency in Planmaking and Development Management

Since the introduction of the National Planning Policy Framework (NPPF) in 2012 there has been an effort to streamline the planning process to improve public understanding and engagement in the process. The preparation of the SNVCHP is in direct conflict with these efforts. The reliance on numerous DPDs makes it difficult for members of the public to understand the full breadth of site allocations and development management policies for the South Norfolk area.

(ii) Disconnected timeframes for planmaking, assessment and Examination

Secondly, the preparation of the SNVCHP in isolation from (and to a different local planmaking timetable to) the GNLP results in disconnected decision-making about the preferred locational development strategy for the area, and risks undermining the co-ordination of infrastructure investment and provision which sits alongside the strategy. Furthermore, assessment and analysis of the appropriateness and suitability of development allocations against stated GNLP objectives when the DPDs are being prepared on significantly different timescales (see table below) is compromised. This will lead to a confusing examination process for both the GNLP and SNVCHP and is also likely to lead to confusion and distrust in the planmaking process by the public who will be attempting to keep up to date with decisions on the future growth and development of their respective settlements.

South Norfolk Village Clusters Document			Greater Norwich Local Plan		
Regulation Consultation	18	June – August 2021	Regulation Consultation	18	January – February 2020
Regulation Consultation	19	March 2022	Regulation Consultation	19	February – March 2021
Submission to SOS		June / July 2022	Submission to SOS		July 2021
Examination		August 2022 – March 2023	Examination		August 2021 – August 2022
Adoption		April 2023	Adoption		September 2022

Timescales based on Draft Local Development Scheme May 2021

(iii) Failure to deliver on overarching Local Plan Objectives

There is a risk that in effectively sanctioning a dispersed settlement strategy for a not inconsiderable number of new homes (a minimum of 1,200), allocations and policy made within the SNVCHP will undermine GNLP objectives of a move to a more sustainable pattern of growth and mobility. Furthermore, it risks acting directly against the commitment in the GNLP to consider new settlements as a growth option to meet future housing and economic growth objectives.

Paragraph 395 of the GNLP outlines that sufficient sustainable sites and locations are identified within and on the edge of existing settlements to meet current needs but there is a recognition that sustainable options for settlement extensions are diminishing. As a response, the GNLP includes Policy 7.6 which commits to one or more new settlements being brought forward in the next Local Plan subject to the outcome of evidence, assessment, and appraisal: a clear signalled intention to move away from the current pattern of continued settlement expansion.

With the rates of rural housing in South Norfolk already consistently exceeding targets¹, it is highly irregular to then perpetuate further rural allocations by way of a separate DPD which by definition cannot then be subject to full Sustainability Appraisal of growth options (through an Examination into the appropriateness of village clusters when weighed against other locational growth options which deliver whole local plan objectives)

Given the above, it is our opinion that in order to move to a sound local planning framework for the Greater Norwich area, the preparation of the SNVCHP and GNLP should be combined from this point on, resulting in a joint Local Plan Examination capable of effective decision making.

Sustainability Appraisal

We consider that the preparation of a standalone Sustainability Appraisal (SA) for the SNVCHP in isolation of the GNLP raises a number of procedural concerns.

As outlined above, allocations for new housing sites at Village Clusters within Broadland District have been included as part of the GNLP. They have therefore been appropriately reviewed and assessed as part of the SA for the GNLP, taking into account overall plan sustainability objectives and assessment criteria.

In contrast, the allocations for the SNVCHP are being assessed as part of an entirely separate SA process. The SA Framework for the GNLP is substantially different to the SA Framework for the SNVCHP – the relevant extracts of both Scoping Reports are included at Enclosure 1a & 1b to this representation. This leads to a fundamentally different assessment of the potential site allocations, and inevitably, leads to different outcomes.

The preparation of a SA in isolation from the GNLP results in a scenario where the sustainability of the Development Plan has not been assessed as a whole but rather in parts against significantly different SA frameworks. This is not a sound approach, and it is difficult to ascertain how an Inspector would be able to confirm the soundness of the decision making process and confirm the suitability of site allocations in respect of two separate sustainability assessments on this basis.

Site assessment process

The site assessment process for the GNLP was clear in that it chose not to assess certain site promotions and defer that to the SNVCHP site assessment process – best presented by the interactive map for the Regulation 18c consultation². We previously raised a concern with this approach at the time given the scale of some of the sites omitted. These concerns remain.

As an example, site GNLP2101 (promoted for a residential-led mixed use development at Spooner Row) included a site area of 77.26ha. The site was not assessed as part of the GNLP but was deferred to be considered as part of the SNVCHP process. However, the SNVCHP is clear that the main aim of the Plan is to allocate a series of smaller sites, typically within the range of 12 to 50 homes, across the 48 Village Clusters in South Norfolk. Site GNLP2101 can accommodate far in excess of 50 homes and as such it is not clear why a site of such scale was deferred to be assessed as part of a process when it significantly exceeds the scale of sites considered suitable for allocation with the SNVCHP.

¹ Page 46 of the Interim SA of the Village Clusters document states that "*Housing delivery in the South Norfolk Rural Area has been consistently strong over several years, averaging 222 dwellings per annum (dpa) between 2011/12 and 2018/19 in relation to the JCS target of 132 dpa*".

²<https://norfolkcc.maps.arcgis.com/apps/webappviewer/index.html?id=551020612db74e94a73c135935a7114d>

This is an illustration of the 'disconnect' arising from the consideration of SNVCHP allocations in isolation from – and against differing sustainability priorities of – the GNLN.

If planmaking within the Greater Norwich area is to be found sound through independent examination, then we suggest that the current tandem planmaking activity for the GNLN and the SNVCHP be brought together as soon as practicable, and in advance of an examination into the GNLN.

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We would be happy to discuss any matters raised within this submission further with you. Please do not hesitate to contact me or my colleague Matthew Hewitt (MHewitt@DavidLock.com) if you require any further information.

Yours faithfully,



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Encl: 1(a) and 1(b) - Extracts, SA Scoping Reports

Figure 84 – Sustainability Appraisal Framework

Theme	Over-arching Objective	Decision making criteria for site allocations and general policies	Suggested indicators and targets
Air Quality & Noise (ref: SA1)	Minimise air, noise and light pollution to improve wellbeing.	<ul style="list-style-type: none"> • Will it have a significant impact on AQMAs in Norwich city central and Hoveton? • Will it minimise impact on air quality? • Will it minimise the impact of light and noise pollution? 	Indicator Concentration of selected air pollutants: a) NO2 b) PM10 (particulate matter) Target Decrease
Climate Change Mitigation and Adaptation (ref: SA2)	Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.	<ul style="list-style-type: none"> • Will it minimise CO2 emissions? • Will it support decentralised and renewable energy generation? • Will it minimise the risk of fluvial or surface water flooding? 	Indicator CO2 emissions per capita Target Reduction in emissions Indicator Sustainable and renewable energy capacity permitted by type Target Year on year permitted capacity increase Indicator Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence or water quality grounds Target Zero

<p>Biodiversity, Geodiversity & Green Infrastructure (ref: SA3)</p>	<p>Protect and enhance the area's biodiversity and geodiversity assets, and expand the provision of green infrastructure.</p>	<ul style="list-style-type: none"> • Will it minimise impact on designated sites and important species and habitats? • Could it provide opportunities for bio- or geo-diversity enhancement? • Could it contribute to green infrastructure networks? • Will it help minimise the impact on air quality at designated sites? • Will it ensure that current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced? 	<p>Indicator Net change in Local Sites in "Positive Conservation Management"</p> <p>Target Year on year Improvements</p> <p>Indicator Percentage of SSSIs in:</p> <ol style="list-style-type: none"> favourable condition unfavourable recovering unfavourable no change unfavourable declining destroyed/ part destroyed <p>Target 95% of SSSIs in 'favourable' or 'unfavourable recovering' condition</p> <p>Indicator Number of Planning Approvals granted contrary to the advice of Natural England or Norfolk Wildlife Trust (on behalf of the County Wildlife Partnership) or the Broads Authority on the basis of adverse impact on site of acknowledged biodiversity importance.</p> <p>Target None</p> <p>Indicator Percentage of allocated residential development sites, or sites permitted for development of 10 or more homes, that have access to a semi-natural green space of at least 2ha within 400m.</p> <p>Target Minimise</p>
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Theme	Over-arching Objective	Decision making criteria for site allocations and general policies	Suggested indicators and targets
<p>Landscape (ref: SA4)</p>	<p>Promote efficient use of land, while respecting the variety of landscape types in the area.</p>	<ul style="list-style-type: none"> • Will it minimise impact on the landscape character of the area, including the setting of the Broads? • Will it enable development of previously developed land? • Will it make efficient use of land? 	<p>Indicator Length of new greenway (defined as a shared use, car-free off road route for a range of users and journey purposes) provided as a consequence of a planning condition, S106 obligation or CIL investment.</p> <p>Target Increase</p> <p>Indicator Total hectares of accessible public open space (cumulative) provided as a consequence of a planning condition, S106 obligation or CIL investment within the plan period</p> <p>Target Equal to or above current local plan requirements.</p> <p>Indicator Percentage of new and converted dwellings on Previously Developed Land</p> <p>Target 18% to 2026 (based on JCS housing allocations, update in line with GNLP)</p> <p>Indicator Number of Planning Approvals granted contrary to the advice of the Broads Authority on the basis of adverse impact on the Broads Landscape</p> <p>Target None</p>

Theme	Over-arching Objective	Decision making criteria for site allocations and general policies	Suggested indicators and targets
<p>Housing (ref: SA5)</p>	<p>Ensure that everyone has good quality housing of the right size and tenure to meet their needs.</p>	<ul style="list-style-type: none"> • Will it ensure delivery of housing to meet needs in appropriate locations? • Will it deliver affordable housing and other tenures to meet needs? • Will it ensure a variety in the size and design of dwellings, to meet a range of circumstances and needs? 	<p>Indicator Net housing completions Target Meet or exceed annual trajectory requirements</p> <p>Indicator Affordable housing completions Target tbc</p> <p>Indicator House completions by bedroom number, based on the proportions set out in the most recent Sub-regional Housing Market Assessment Target Figures within 10% tolerance of the Housing Market Assessment Requirements</p> <p>Indicator Starter Homes completions Target 20% of homes delivered are starter homes</p> <p>No indicators for provision of community facilities have been identified</p>
<p>Population and Communities (ref: SA6)</p>	<p>Maintain and improve the quality of life of residents</p>	<ul style="list-style-type: none"> • Will it enhance existing, or provide new community facilities? • Will promote integration with existing communities? 	<p>No indicators for provision of community facilities have been identified</p>

Theme	Over-arching Objective	Decision making criteria for site allocations and general policies	Suggested indicators and targets
Deprivation (ref: SA7)	To reduce deprivation	<ul style="list-style-type: none"> Will it help to reduce deprivation? 	Indicator and targets from IMD to be identified
Health (ref: SA8)	To promote access to health facilities and promote healthy lifestyles	<ul style="list-style-type: none"> Will it maximise access to health services, taking into account the needs of an ageing population? Will it promote healthy lifestyles? Will it avoid impact on the quality and extent of existing assets, such as formal and informal footpaths? 	Indicator Percentage of physically active adults Target Increase percentage annually or achieve percentage above England average Indicator and target for access to health facilities to be identified
Crime (ref: SA9)	To reduce crime and the fear of crime	<ul style="list-style-type: none"> Will it help design out crime from new development? 	Indicator and target for crime reduction to be identified
Education (ref: SA10)		<ul style="list-style-type: none"> Will it enable access to education and skills training? 	Indicator and target for access to education facilities to be identified

Theme	Over-arching Objective	Decision making criteria for site allocations and general policies	Suggested indicators and targets
<p>Economy (ref: SA11)</p>	<p>Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents, and maintain and enhance town centres.</p>	<ul style="list-style-type: none"> • Will it promote Greater Norwich as a regional economic centre? • Will it promote employment land provision to support existing and future growth sectors? • Will it promote a range of employment opportunities? • Will it promote vibrant town centres? • Will it promote the rural economy? 	<p>Indicator Amount of land developed for employment by type</p> <p>Target 118ha B1 & 111ha B2 / B8 2007 to 2026 (split into five year tranches, based on JCS targets - update in line with GNLP targets)</p> <p>Indicator Annual count of jobs by BRES across the Plan area</p> <p>Target Measure against GNLP annualised jobs targets (2,222 p.a in JCS.)</p> <p>Indicator Employment rate of economically active population</p> <p>Target Increase</p> <p>Indicator Percentage of workforce employed in higher occupations</p> <p>Target Annual increase of 1%</p>

Theme	Over-arching Objective	Decision making criteria for site allocations and general policies	Suggested indicators and targets
Transport and access to services (ref: SA12)	Reduce the need to travel and promote the use of sustainable transport modes.	<ul style="list-style-type: none"> • Does it reduce the need to travel? • Does it promote sustainable transport use? • Does it promote access to local services? • Does it promote road safety? • Does it promote strategic access to and within the area? 	<p>Indicator Percentage of residents who travel to work:</p> <ul style="list-style-type: none"> a) By private motor vehicle b) By public transport c) By foot or cycle d) Work at, or mainly at, home <p>Target Decrease in a), increase in b), c) and d)</p> <p>Indicator IMD Access to services and housing</p> <p>Target Increase the number of LSOAs in the least deprived 50% on the IMD for access to housing and services</p>
Historic Environment (ref: SA13)	Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment.	<ul style="list-style-type: none"> • Does it enable the protection and enhancement of heritage assets, including their setting? • Does it provide opportunities to reveal and conserve archaeological assets? • Could it benefit heritage assets currently 'at risk'? 	<p>Indicator Percentage of Conservation Areas with appraisals</p> <p>Target Year on year increase</p> <p>Indicator Heritage at risk – number and percentage of</p> <ul style="list-style-type: none"> a) Listed buildings; and b) Scheduled Ancient Monuments on Buildings at Risk register <p>Target Year on year reduction</p>

Theme	Over-arching Objective	Decision making criteria for site allocations and general policies	Suggested indicators and targets
<p>Natural Resources, Waste and Contaminated Land (ref: SA14)</p>	<p>Minimise waste generation, promote recycling and avoid the sterilisation of mineral resources.</p> <p>Remediate contaminated land and minimise the use of the best and most versatile agricultural land.</p>	<ul style="list-style-type: none"> • Does it contribute to the minimisation of waste production and to recycling? • Does it safeguard existing and planned mineral and waste operations? • Will it help to remediate contaminated land? • Does it avoid loss of the best and most versatile agricultural land (grades 1-3a)? • Will there be adequate provision for waste and recycling facilities? 	<p>Minerals and waste indicators and targets tbc</p> <p>Indicator Number of planning permissions granted on non-allocated sites on class 1, 2 or 3a agricultural land</p> <p>Target Zero</p> <p>Indicator Percentage of land allocated for development, or subject to an extant planning permission of 5 or more dwellings that is identified as Grade I or II agricultural land value.</p> <p>Target Minimise</p> <p>No indicators for contaminated land have been identified</p>

Theme	Over-arching Objective	Decision making criteria for site allocations and general policies	Suggested indicators and targets
Water (ref: SA16)	Maintain and enhance water quality and ensure the most efficient use of water	<ul style="list-style-type: none"> • Will it maximise water efficiency? • Will it minimise impact on water quality? • Will it impact on water discharges that affect designated sites? • Will it contribute to achieving the River Basin Management Plan actions and objectives? 	<p>Indicator Water efficiency in new homes</p> <p>Target All new housing schemes to achieve water efficiency standard of 110 litres/person/day (lpd) No indicators for water infrastructure have been identified.</p> <p>See also flood section (Number of planning permissions contrary to the advice of the Environment Agency on either flood defence or water quality grounds)</p>

14 Conclusion and next steps

14.1.1 A review of evidence presented under 12 twelve topic headings has led to a discrete list of objectives (and supporting key issues / opportunities) that should be taken forward as a framework to guide the forthcoming appraisal stages of the VCHAP SA process. This framework was consulted on via the scoping consultation and has been updated to reflect comments received. The SA framework is presented below.

Figure 14.1: The draft SA framework

Topic	Objective
Accessibility	Support good access to existing and planned services, facilities and community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.
Biodiversity	Avoid harm to South Norfolk's rich diversity of internationally, nationally and locally designated sites of biodiversity significance, as well as to sites in adjacent Local Plan areas, whilst seeking to deliver a biodiversity net gain and enhancement of habitats and habitat connectivity in all but exceptional cases.
Climate change adaptation	Support the resilience of South Norfolk to the potential effects of climate change, including by directing development away from areas at greatest risk of fluvial and surface water flooding.
Climate change mitigation	Continue to reduce CO ₂ emissions from all sources by achieving high standards of energy efficiency in new development, by supporting decentralised energy generation, by providing attractive opportunities for sustainable travel, by locating residential development a short distance from key services and by protecting land suitable for renewable and low carbon energy generation, including community schemes, whilst recognising the changing nature of private cars with the Government's current aim of phasing out all sales of internal combustion engine cars within the lifetime of this plan.
Communities	Support the continued healthy and sustainable growth of South Norfolk, narrowing the gap between the areas of the district with strongest and least strong health and social outcomes. Helping to maintain local services and facilitates in more rural locations, to the benefit of existing and future residents.
Economy	Support the continued provision of, and vitality of, local employment opportunities across the district whilst seeking to take advantage where possible of new strategic opportunities, such as those associated with the Cambridge Norwich Tech Corridor. To support a range of housebuilding opportunities, particularly for small and medium sized builders,
Historic environment	Protect, conserve and enhance designated, non-designated and as-yet undiscovered heritage assets and their settings, and contribute to maintaining and enhancing South Norfolk's historic character through design, layout and setting of new development .
Housing	Support timely delivery of an appropriate mix of housing types and tenures to ensure supply of high quality housing across the village clusters which meets the needs of South Norfolk residents and diversify the housing market to help maintain delivery.
Land and soils	Ensure the efficient and effective use of land by avoiding unnecessary development on best and most versatile agricultural land and maintaining the integrity of mineral extraction sites and safeguarding areas.
Landscape	Protect and enhance the character, quality and diversity of the district's rural landscapes, townscapes and river valleys through appropriate design and layout of new development, including protecting the setting of The Broads Authority areas.
Transport	Ensure that provision of transport infrastructure reflects local population and demographic needs within and between the village clusters, promotes sustainable modes of travel, connects new housing to employment, education, health and local services and maximises accessibility for all.
Water	Promote sustainable forms of development which minimise pressure on water resources, whilst maintaining and enhancing where possible the quality of the district's rivers, lakes and other water bodies.