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13 March 2020

Greater Norwich Growth Board

Submitted electronically

Dear Sirs

Greater Norwich Local Plan Regulation 18, Stage C, Draft Strategy and Site Allocations, Broadland Village Clusters – Land east of Salhouse Road, Little Plumstead

Background

The representations are submitted on behalf of Glavenhill Limited to the Greater Norwich Local Plan (GNLP) Regulation 18, Stage C Draft Strategy and Site Allocations Process.

These representations relate to Land east of Salhouse Road, Little Plumstead. The land is being promoted for residential allocation by Glavenhill on behalf of the landowner.

The site was previously promoted to the Greater Norwich Local Plan Regulation 18 process as part of the Stage A Site Proposals and Growth Options consultation in March 2018 (site reference GNLP0483) for residential development together with new areas of green infrastructure (see **Appendix 1** for site boundary). At that time the site was promoted as a sustainable residential extension to the existing 'Local Service Centre'.

At the time of the Regulation 18, Stage A representations, Glavenhill had submitted and was awaiting the determination of, an outline application for the development of the site for 84 dwellings including 5% self-build and 33% affordable units.

The representations confirmed with reference to the submitted technical application documentation, that the site is a suitable location for residential development. The technical information submitted in support of those representations remains valid.

The application has since been refused and dismissed at Appeal with the Inspector concluding that the proposals would conflict with Policy 15 of the Joint Core Strategy in providing in excess of the 10-20 dwellings that is currently directed to the Local Service Village within the Core Strategy.

Concern was also expressed over the alleged lack of foot and cycleways, and the infrequency of buses and thus the potential reliance of future residents on the private car. This led the Inspector to conclude that the development of the site for 84 dwellings would result in unsustainable patterns.

The Inspector also commented on the appellant's provision of a new mini roundabout, suggesting that its benefits would be diminished by the fact that it would be needed to support the appeal proposal. He rather surprisingly questioned the mechanism to secure the roundabout to any permission despite the Council and the Appellant confirming their agreement to a suitably worded planning condition which would ensure its delivery.

Glavenhill wrote to the Greater Norwich Growth Board (GNGB) in June 2019 confirming that despite the 'unusual' and disappointing appeal decision, they remain committed to the site and had explored an alternative scheme that addressed each of the Inspector's reasons for refusal and delivered additional benefits.

An illustrative masterplan (see **Appendix 2**) was submitted with the representations showing how the site could be delivered, and was therefore suitable for allocation within the GNLP for:

- A reduced number of dwellings (35) of which a proportion 5% may be self build and 28% affordable units (in accordance with the latest SHMA evidence).
- New care / extra care housing to respond to identified local needs for sustainable, longer term / specialist accommodation and to deliver new employment opportunities for the incumbent and future populations.
- New community uses, including potential for small scale retail facilities on site (within 400m walking distance of circa 95% of the village chimney pots).
- The giving over of land to the north west of the site to the Parish as open space in perpetuity, providing a long term landscape buffer to the settlement.
- The provision of new community allotments to provide sustainable sources of food and the promotion of healthy living.
- The provision of footpath and road calming measures in accordance with Neighbourhood Planning policy.

Despite these most recent representations, Broadland District Council has as part of this current Regulation 18, Stage C Consultation, continued to consider the suitability of the site for 86 dwellings with 5.83 ha of green infrastructure and new play equipment (see below for Council's assessment and Glavenhill's response). They have determined not to allocate the site for this form of development within the Regulation 18, Stage C Document for reasons explained and rebutted within the following section.

These Representations

The villages of Great and Little Plumstead have under the current Regulation 18, Stage C process been 'grouped together' and re-categorised from a 'Local Service Centre' to a 'Village Cluster'.

These latest representations are therefore made in response to draft Policy 7.4 of the Regulation 18, Stage C Consultation Document which deals with the GNGB's strategy for Village Clusters and the accompanying 'Broadland Village Clusters Key Document', relating to Great and Little Plumstead which assesses the suitability of the previously proposed allocation site.

Draft Policy 7.4 confirms that 4,024 homes, or around 9% of the total housing growth for the Greater Norwich Area, to be brought forward within the plan period, will be located within village clusters. 480 of these homes will be allocated within Broadland.

Draft Policy 7.4 aims to promote social sustainability by supporting rural life and services through facilitating small scale residential development in village clusters such as Little and Great Plumstead. The provision of several relatively small allocation sites is suggested to have the additional benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations. Village clusters within Broadland have been identified based on primary school catchments, which provide a proxy for social sustainability.

Broadland confirm their strategy for the village cluster of Great and Little Plumstead within their Village Clusters Key Document as follows:

“Whilst it is considered the cluster could accommodate development of 50-60 additional homes, there are currently no new allocations proposed and no allocations to be carried forward in this cluster. There are, however, 129 dwellings with planning permission on a number of sites. No new allocations are proposed but further development is not ruled out. Windfall development policy 7.4 allows an amount of growth in each village cluster that reflects primary school capacity.”

In assessing the suitability of the subject site for allocation within this Document, Broadland confirm that the site:

“is not considered to be reasonable for allocation due to the level of highway improvements that would be needed at the ‘Brick Kilns’ junction in the form of junction realignment or a roundabout.”

These representations respond to both Broadland’s strategy for the village cluster of Great and Little Plumstead and the Council’s conclusions on the site’s suitability within the following sections.

Representations to Proposed Village Cluster Strategy

Glavenhill object to Broadland’s strategy for the village cluster of Great and Little Plumstead as set out within the relevant Village Clusters Key Document, considering it to be neither ‘positively prepared’, ‘justified’ or ‘effective’ in delivering the houses needed within the village over the plan period and is therefore ‘unsound’ when considered against paragraph 35 of the National Planning Policy Framework (NPPF).

The cluster has been deemed an appropriate location for further growth and in the order of 50 to 60 new homes by the Council based upon its local service provision, not least the capacity of the local primary school. Despite the settlement’s capacity for growth, Broadland has deemed it unnecessary to carry forward any previous allocations or set any new ones, relying instead on the draft windfall strategy set out in draft Policy 7.4 of the Regulation 18, Stage C Consultation Document.

Whilst national planning policy guidance confirms that windfall sites can, if supported through policies, facilitate the delivery of small and medium housing sites and therefore assist in meeting the housing requirement of an area, paragraph 70 of the NPPF is clear that any windfall strategy should be based upon *“compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”*

There is no such evidence provided in this instance.

As such, Glavenhill suggest that a more effective and deliverable strategy would be to allocate a series of small sites (each providing in the order of 12-25 homes) to the village cluster, within the new Local Plan that have been confirmed as being deliverable by landowners and promoters in the short term.

The site to the east of Salhouse Road, Little Plumstead is one such site.

The Proposed Allocation Site

The Council has deemed the subject site to be unsuitable for residential development of circa 86 dwellings based upon the potential impact that it may have on the Brick Kiln Junction.

To the contrary, a smaller scale residential development, of in the order of 20 to 25 dwellings would have limited if any material impact upon the operation and safety of this junction. This assertion is supported by the fact that a proposal of this sort would fall far below the minimum threshold for requiring a highway statement or assessment as set within Norfolk County Council's Safe, Sustainable Development Aims and Guidance notes for Local Highway Authority requirements in Development Management for transport.

Summary of Development Offer

The proposed allocation site provides a suitable, available and deliverable opportunity for Broadland District Council to supplement housing supply within its rural area in line with the GNGB's village cluster strategy.

The site would, if allocated, assist the Council in meeting an identified need for new housing in the Great and Little Plumstead village cluster which fails to be met through the Regulation 18, Stage C Consultation Document.

Lanpro has demonstrated the site's suitability for residential development against a number of technical criteria through the recent planning application and appeal process. The recent appeal decision did not question the site's environmental suitability but drew issue only with the scale of the proposed development and its impact upon the surrounding highway network.

In direct response, the allocation of part of the site (circa 1ha) for between 20 to 25 dwellings (in the manner shown on the illustrative masterplan enclosed at **Appendix 3**) would:

- Make a meaningful contribution to bolstering local housing supply in the rural area of Broadland and within a village cluster that has been identified as requiring additional growth.
- Provide a mix of house types and tenures, including a policy compliant amount of affordable homes to assist in addressing local, rural housing needs.
- Deliver a logical and defensible limit to the existing settlement.
- Facilitate easy and safe pedestrian access to the local Primary School to support local services and the vitality of the rural area.
- Result in only a modest amount of traffic that can be easily accommodated by existing infrastructure.
- Be of an appropriate scale to be attractive to small to medium sized housebuilders who find it difficult to compete for and deliver larger strategic sites and will provide additional choice to the local housing market.

The site has received good interest from local house builders, who offer their support to these representations.



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I trust that the above and enclosed is of some assistance to you and your colleagues in concluding the suitability and deliverability of the proposed allocation site.

A handwritten signature in black ink, appearing to be "Hannah Smith".

Yours sincerely

Hannah Smith
Associate Director, MRTPI, AIEMA




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Appendix 1 – 2018 promoted land

Note

SUMMARY

 Site Boundary

 Access

Site Area 11.38 Ha

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Number 0100031673

PROJECT TITLE
Little Plumstead

PROJECT NUMBER
LAN001-0555

CLIENT
Glavenhill

DRAWING TITLE
Site Boundary

DRAWING NUMBER REV
001 -

SCALE
1/2500 (A3)

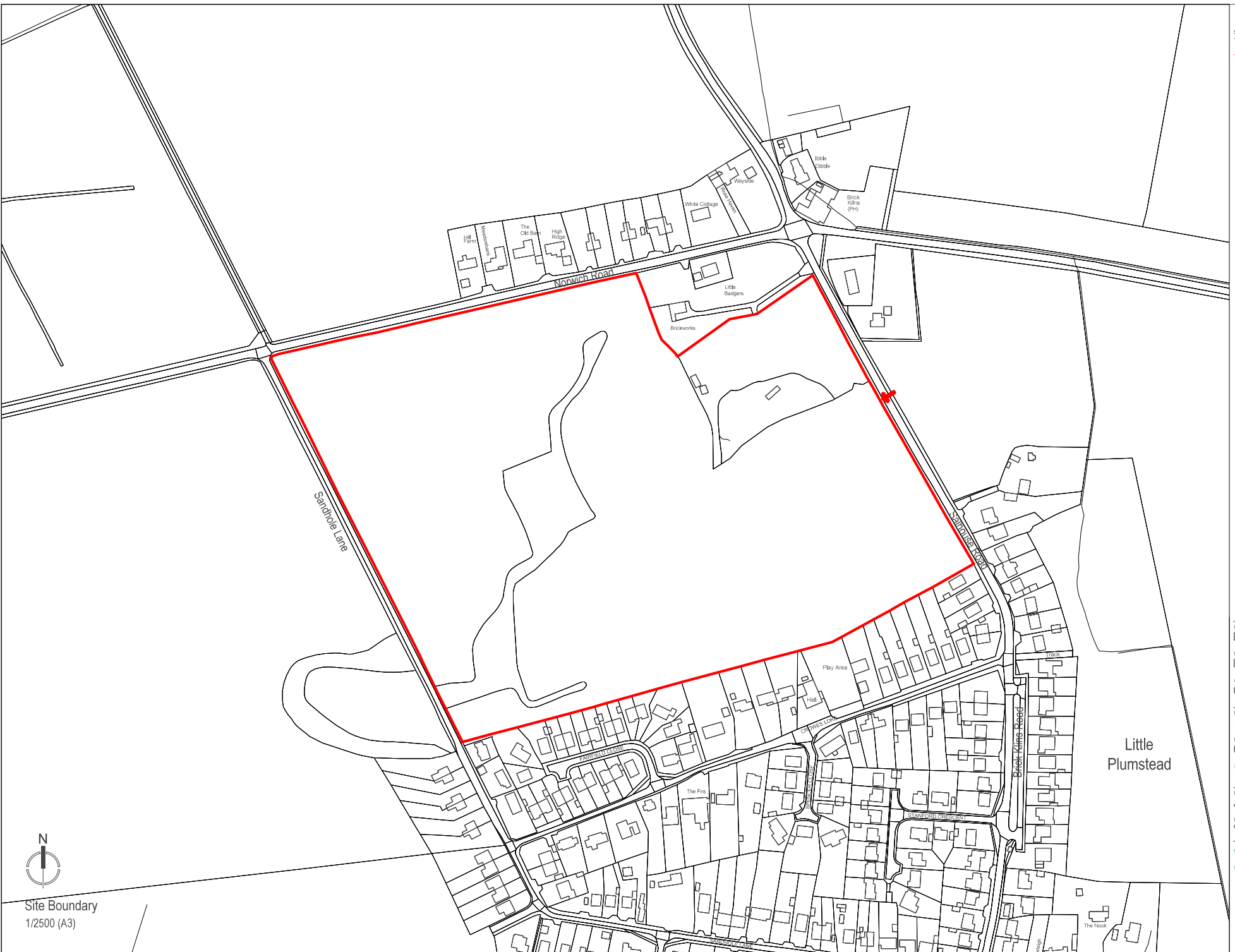
DATE
JUNE 2016

DRAWN BY
VK/JPG

Lanpro

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Site Boundary
1/2500 (A3)

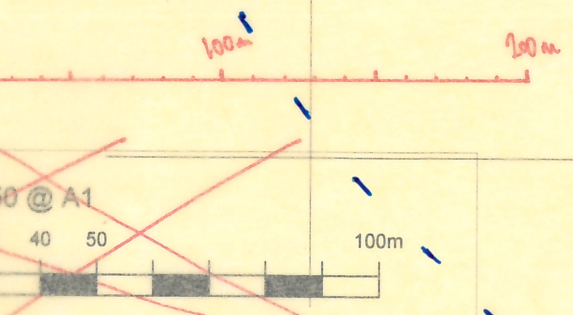


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Appendix 2 – 2019 promoted masterplan

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 Location Plan 1:1250 @ A1
 1:1250



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<http://www.hse.gov.uk/construction/2015responsibilities.htm>
 It is your responsibility as client to make yourself aware of your role within CDM 2015 and act accordingly.

PURPOSE OF ISSUE	PL - Planning	RIBA STAGE	3
DRAWING STATUS	S1 - Information		
PROJECT TITLE	Little Plumstead		
CLIENT	Gloverhill Strategic Land (No 12) Limited		
DRAWING TITLE	Indicative Masterplan	SCALE	1:1250
DATE	Dec 2017	DRAWN BY	TU
CHECKED BY	TUJC	APPROVED BY	JC
DRAWING NUMBER	PROJECT NO	TYPE	UNIQUE NO
0555 - 00 - 002			

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Appendix 3 – 2020 proposed allocation area and masterplan



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REVISED BY: -	DATE: -	CHECKED BY: -	DATE: -
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PURPOSE OF ISSUE IN - For Information	RIBA STAGE -
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DRAWING STATUS S0 - Initial Status
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PROJECT TITLE Little Plumstead

CLIENT Glavenhill

DRAWING TITLE Site Schematic Arrangement - GNL Reg 18C Consultation	SCALE 1:2500@A3
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DATE Feb 2020	DRAWN BY TH	CHECKED BY DO	APPROVED BY DO
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DRAWING NUMBER			
PROJECT NO	TYPE	UNIQUE NO	REVISION
1686A-	00	- 001	-



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