

Greater Norwich Local Plan Examination Inspectors Matters Issues and Questions (Part 2)

Tuesday 8 March (am) Matter 11: Key Service Centres
aa. Land off Broomhill Lane, Reepham (Ref REP1)

Broadland's Site Allocations DPD states 'REP1 Land off Broomhill Lane (approx 8.2Ha is allocated for residential development & community facilities, including cemetery land, recreational open space and a sports hall) and 'the site will accommodate approximately 100-120 homes in total'

Q - Is the particular site allocation soundly based ?
The responses follow the 6 questions put by the Inspectors.

A1 – It is NOT soundly based, nor on track with the 2016 Broadland DPD, due to the complexities of multiple ownership and applications (20200469 & 0847 & 1183) that were submitted and despite a number of significant revisions and corrections are still undetermined some 2 years later.
Broadland Officials in their SoCG now 'recognise modifications may be proposed by the Inspectors and Site Promoters may also seek changes to the plan' It is also the case that objectors to the applications and the Allocation should also be given an opportunity to comment on any changes, and that other allocations previously discarded, be reconsidered.

A2 – The reason for this is that despite the SoCG comment in Q6 that 'no technical constraints are identified which could not be addressed' However there appears to have been no engagement by the applicant with Anglian Water, there remains a holding objection from Norfolk County Highways Authority, and there are objections from Sport England and English Nature.

Travel Issues - The Highways Engineer (18/01/22) states that the Transport Assessment 'does not demonstrate that the local network is able to accommodate' the development traffic accessing Whitwell Road which is the only approach to the site. This is a fundamental concern of almost all the residents who objected to both the 3 applications and the REP1 allocation at the time, as road capacity on Whitwell Road/School Road and Townsend Corner is severely restricted and will not be resolved simply by introducing a 20 mph speed limit.

Green Infrastructure Issues – REP1 is outside the Settlement Boundary on two greenfield sites – 5.5ha of farmland and 2.1ha High School Rugby Field, forming the Foulsham and Reepham Plateau Farmland, and adjacent to the Broomhill Meadows County Wildlife Site with a public right of way traversing the site and another along its border. The applicant's Ecology Report was dismissive of the site's importance and the Site's Curator stated (19/4/21) 'The ecological assessment is a misrepresentation of the true picture and does not accurately address the impact that the housing development will have on the area'. Adding 141 houses is counterproductive to the current Carbon Neutrality and to Central and Local Government targets.

Access to Services and Facilities – Reepham residents returned more responses (over 1,100) during consultations on the 2014 Joint Core Strategy and the 2016 Site Allocations DPD , such is the strength of local feeling against REP1, even Inspector Louise Crosby in her Public Inquiry report (30/3/2016) stated 'This site has generated a significant level of interest from local residents most of whom are opposed to it'.

A3 – The site has NOT been robustly assessed, as the REP1 allocation now has to rely on 3 completely separate planning applications (20200469 & 0847 & 1183) that are interdependent as if one fails then the others cannot go ahead in compliance with the REP1 allocation requirements.

Application 20200847 (Housing), if approved by the Planning Committee, must therefore be referred to the Secretary of State for permission prior to commencement. In any case the application is significantly materially different from both the existing and proposed REP1 allocation, particularly in respect of the housing proposals, which previously (2016) were 'approximately 100-120 homes in total' and now (2022) are 'approximately 100 homes in total', signifying a reduction in overall housing numbers.

Application 20200469, (Access Road) the visibility splay to Whitwell Road is outside the ownership of the applicant and there is a Highway Authority requirement that the visibility splay must be provided prior to commencement of any work at the proposed development. It has not yet been confirmed that the required land can be secured. This issue was first raised by Mr Wilson in May 2020.

Application 20201183 (Sports Hall) is a significant material amendment to both the existing and proposed REP1 allocation and has been repositioned on a site not allocated for development with an access through the existing School car park and insufficient additional parking spaces.

The deliverability of the Sports hall is in question with the headmaster Mr T Gibbs confirming publicly to the local Eastern Daily Press paper, that it may not be built within 5 years, If At All. Two viability Assessments have been provided (15/4/20 and 20/5/21) but do not comply with Government guidelines (1/9/19) which state – 'Where a viability assessment is submitted to accompany a planning application this should be based upon and refer back to the viability assessment that informed the plan, and the applicant should provide evidence of what has changed since

then' There is no viability assessment for a REP1 compliant plan of 100 – 120 homes and an on site Sports hall and no indication of what has changed to make compliance with the original REP1 allocation unviable.

The NPPF (18 January 2020) Glossary definition of 'deliverable' says to be considered deliverable 'sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years'

The (2016) REP1 allocation has not progressed for 5 years and in the submitted SoCG (October 2021) Q1, the applicants 'are confident of securing planning permission by the end of 2021', this has not been achieved. The long delays and significant material deviation from the original REP1 allocation indicate that the site as a whole is unsuitable, unviable and undeliverable six years after it was first allocated.

A4 – The evidence submitted for REP1, confirms that the housing trajectory will not be sustained for Reepham as a Key Service Centre, as due to REP1 not progressing there is a continuing housing shortfall in Reepham since 2016 due to other suitable allocations such as GNLP0183 (65-70 dwellings) and GNLP 0180 (35 dwellings) not being brought forward due to the 'high amounts of existing commitments', at REP1.

To ensure the housing requirement for Reepham of 155 homes in the plan period to 2036 is delivered it is considered a reduction in the number of homes on REP1 to 50 houses (see attached Plan 1), is required and two previously supported 2016 allocations (GNLP0183 and GNLP 0180) for (65 + 35 houses) be brought forward, and as they are both in single ownership and on an annual rental they can be made available and deliverable immediately, and both sites have excellent pedestrian and cycle access to the town centre along Back Lane a well maintained public footpath.

This would give a total allocation of 150 homes as required for the remaining Plan period, and allow REP1 to be 'future-proofed' for development beyond 2036 if required. In fact GNLP 0183 was allocated by Broadland in 2016 in the penultimate submission (see attached Plan 2) prior to the sudden appearance of REP1 (100 houses) in the final submission.

Also both GNLP0183 and GNLP0180 were supported by the Town Council at the time. (see attached plans 3 & 4). Both sites were subjected to detailed consultations and a number of pre-application requirements were satisfied (Highway Authority, Landscape and Archaeological Assessment, Water Porosity Tests, etc) and planning applications were made ready for submission.

A5 – The detailed policy requirements outlined in REP 1 are more than justified and the significant material amendments made to the 3 applications goes to show that the Allocation was ineffective and unsound in 2016 and even more so, due to the housing increase and omission of the Sports hall in 2022.

A6 – There is already an uplift in capacity on REP1, due to the significant housing increase to 141 dwellings that is materially well above the 2022 allocation for 'approximately 100 houses in total' which cannot be supported by the evidence submitted to application 20200847. The extension of the site to relocate the Sports hall to a new location is not justified nor supported by the evidence submitted to application 20201183. The Sports Hall should be removed from REP1 as it no longer features and the CIL generated from the 3 proposed allocations directed to a much needed replacement Community Building on Stimpson's Piece.

To summarise,

The REP 1 allocation in its previous and proposed form cannot be sustained, cannot be viable, cannot be delivered, and cannot be sound. The latest NPPF para 8 advises that development must have an economic objective, a social objective and an environmental objective.

The REP1 allocation in its current and proposed form cannot be sustained, cannot be viable, cannot be delivered, and cannot be sound. In which case other allocations as suggested above must be brought forward to ensure delivery of the required housing allocation to satisfy the Plans housing requirements and maintain Reepham as a Key Service Centre.

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9 February 2022