

**GREATER NORWICH  
LOCAL PLAN  
EXAMINATION**

**MATTER 15: HOUSING  
PROVISION**

---

**WRITTEN STATEMENT**

**Noble Foods Ltd**

**8 February 2022**

**Carter Jonas**

## CONTENTS

---

<b>1.0</b>	<b>MATTER 15: HOUSING PROVISION</b>	<b>3</b>
	Introduction	3
	Matter 15 – Housing Provision	3

## 1.0 MATTER 15: HOUSING PROVISION

### Introduction

- 1.1 This Written Statement for Matter 10 has been prepared by Carter Jonas on behalf of Noble Foods Ltd to respond to the Inspectors questions on housing provision. This Statement relates to the supply and delivery of housing, with a focus on the housing strategy for the village clusters. There is some overlap with the Inspectors questions for Matter 3 Issue 4: Village Clusters and Issue 5: Small Scale Windfall Housing Development.
- 1.2 Noble Foods Ltd is promoting an alternative housing allocation in Marsham at land at Fengate Farm (Ref. GNLP3035). The land at Fengate Farm is adjacent to the settlement boundary for the village, and contains vacant and unused buildings and areas of hardstanding associated with a former poultry unit. The former poultry use ceased in 2011 and the buildings were damaged by fire in early 2020., which is contains vacant and unused buildings and areas of hardstanding associated with a former poultry unit. The former poultry use ceased in 2011. The buildings were damaged by fire in early 2020.
- 1.3 Noble Foods Ltd submitted representations to the pre-submission draft Greater Norwich Local Plan (draft GNLP) that address the issues raised in Matter 15. The relevant Id. numbers for those representations are as follows:
  - Policy 7.4: Village Clusters – Rep Id. 23528
  - Policy 7.5 Small Scale Windfall Housing Development – Rep Id. 23529
- 1.4 In summary, the strategy for the supply and delivery of housing in the village clusters does not take into account the circumstances that arise in Marsham, where a large vacant and derelict site located outside the settlement boundary is available for redevelopment, but there is no strategy in draft GNLP to support that redevelopment. Noble Foods Ltd has requested that land at Fengate Farm in Marsham (Site Ref. GNLP3035) is specifically allocated in draft GNLP, or alternatively the Fengate Farm site should be incorporated into the village boundary to enable the delivery of housing and affordable housing at this vacant and unused site. It would not be appropriate to increase the windfall threshold (of 3 to 5 dwellings) that applies to village clusters to enable major developments to come forward e.g. approximately 35 dwellings at the Fengate Farm site in Marsham.

### Matter 15 – Housing Provision

#### **Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy?**

- 1.5 No. There is no strategy in draft GNLP that would enable the redevelopment for housing of the vacant and unused derelict site at Fengate Farm in Marsham. Policy 7.4 of draft GNLP expects the village clusters in Broadland, including Marsham, to contribute towards the housing supply through site allocations, infill development and affordable housing-led development. Policy 7.5 of draft GNLP supports small scale windfall housing development in all villages and allows for developments on sites adjacent to the defined village boundaries for up to 3 dwellings at small parishes and up to 5 dwellings at large parishes including Marsham. Policy GNLP2143 of draft GNLP allocates land south of Le Neve Road in Marsham for approximately 35 dwellings.

- 1.6 The policy approach of infill development within settlement boundaries at cluster villages is likely to provide a very limited amount of housing. It is likely that most infill development opportunities where they exist would deliver no more than one or two additional dwellings and would fall below the threshold where affordable housing is required. There are limited opportunities for infill development within the settlement boundary for Marsham. The policy approach of small scale windfall housing development on sites adjacent to the settlement boundaries of cluster villages only allows for up to 5 dwellings at the larger parishes including Marsham. There will be some opportunities for additional housing to be provided through windfall sites, but as for infill development the size of eligible sites falls below the threshold where affordable housing is required.
- 1.7 Draft GNLP does include a housing allocation in Marsham that would contribute towards the housing land supply. However, as set out in Noble Food Ltd's objections to Policy GNLP2143 and in the Matter 10 Hearing Statement, the preferred allocation at land south of Le Neve Road is not justified, and the evidence used to support the decision to allocate this site is not robust. The Councils have selected a greenfield site with significant impacts on heritage assets and landscape character, when a vacant and unused derelict site is available elsewhere in the village. This outcome would be contrary to national policy, and inconsistent with the objectives and policies in draft GNLP.
- 1.8 As set out in representations to draft GNLP, Noble Foods Ltd is promoting a vacant and unused site located immediately adjacent to the village boundary at Marsham - land at Fengate Farm (Site Ref. GNLP3035). Noble Foods Ltd instructed consultants to assess heritage, landscape, ecological and highway/access impacts of the promoted development at the Fengate Farm site, and these reports were submitted with representations to draft GNLP - see Rep Id. 23568. There are no identified constraints associated with heritage, landscape or ecological matters at the site, and access is not a constraint because a vehicular access compliant with highway design standards is achievable via Old Norwich Road and a safe pedestrian route is available between the site and the primary school.
- 1.9 Therefore, the land at Fengate Farm in Marsham does not qualify as an infill development site and is too large to be a small scale windfall site, and in any event these types of site do not provide any affordable housing. The Councils have selected a greenfield site (land south of Le Neve Road) as the preferred allocation for Marsham, when a non-greenfield site (land at Fengate Farm) that is vacant and contains unused, derelict and fire damaged buildings and structures is available in the village. The Fengate Farm site is located outside the proposed settlement boundary for the village, and development at the site would be contrary to the proposed policies in draft GNLP. As such draft GNLP contains no strategy for the redevelopment of the Fengate Farm site, which is an unacceptable outcome for a vacant and unused derelict site, and an approach that is negative and unsound. It is considered that the promoted development at the Fengate Farm site would be consistent with Paragraphs 119, 120(d), and 174(f) of the NPPF, and the environment and homes objectives and Policy 2 of draft GNLP relating to the efficient use of land, and the reuse of vacant, under used and derelict land.
- 1.10 Noble Foods Ltd has requested that land at Fengate Farm in Marsham (Site Ref. GNLP3035) is specifically allocated in draft GNLP, or alternatively the Fengate Farm site should be incorporated into the village boundary to enable the delivery of housing and affordable housing at this vacant and unused site.

