



**GNLP Regulation 18 Consultation Response
March 2018**

**Land west of Salhouse Road, Little Plumstead
GNLP0483**

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1. Executive Summary

This representation is prepared and submitted on behalf of Glavenhill Strategic Land Limited for a site west of Salhouse Road, Little Plumstead for promotion as a residential development site as part of the Greater Norwich Local Plan.

This submission builds upon the information that was submitted as part of the Call for Sites stage in July 2016. Since that time part of the site has been submitted in the form of an outline planning application to Broadland District Council for redevelopment for 84 dwellings, with this application currently pending determination.

Allocation of the site would bring forward a significant public benefit with the delivery of a roundabout at the Brick Kiln junction. This highway improvement is identified within the Neighbourhood Plan.

The site has now been subject to a number of technical assessments which informed the planning application and demonstrate that there are no fundamental constraints to the development of the site for residential and it is therefore considered SUITABLE for development.

2. Site Introduction and Description

Introduction

These representations are submitted on behalf of Glavenhill Strategic Land Limited for the land west of Salhouse Road, Little Plumstead (GNLP0483).

The site was submitted to the 'Call for Sites' consultation which took place in July 2016. The site has been assessed as part of the Housing and Employment Land Availability Assessment (Dec 2017) which forms part of the evidence base of this current Regulation 18 consultation.

Part of site (GNLP0483) is currently subject to an outline planning application which is pending determination by Broadland District Council (ref: 20172209) for development of approximately 6.87 ha site comprising of 84 dwellings with new access, associated infrastructure and creation of areas of open space (please see plan in Section 3 below and Appendix 1). The technical reports and application documentation along with consultee comments that have been received to date on the planning application are referred to within this representation to support the sites deliverability and suitability for residential development. All of these documents are publicly accessible from Broadland District Council using reference 20172209.

The Site and Surroundings

The site is located on the northern edge of the village of Little Plumstead and to the west of Salhouse Road. This is the main road through the village which is one of the main routes to connect the village with Norwich to the west.

The site is currently part of a larger field which is partly in agricultural use and partly laid to grass. The site was part of a former brickworks and there is a tree belt feature which runs diagonally across roughly through the middle. This feature was a historic feature of the former brickworks. The sites boundaries are made up of vegetation which is a mixture of trees and hedgerows with some post and rail fencing around parts of the boundary. The site does not have any significant level changes (other than the central tree belt area) otherwise it is fairly consistent. The lowest part of the site is along the southern boundary and then rises as you move north west towards the tree belt, the levels increase by around 2.5m. The area of the tree belt contains remnants of the old brick works and the pits and changes in levels reflect this. The land on the western side of this feature is about 3.5-4m higher than the eastern side. Within the belt there are trees, shrubs and overgrowth.

There are electricity lines which run parallel with Salhouse Road and also along the southern boundary. There is a foot path which runs along with eastern side of Salhouse Road, which starts at the Brick Kiln junction and goes past the site and continues southwards. The closest bus stop to the site is located to the north of the site adjacent to the Brick Kiln junction and is served by the Konect Bus 5C service. This operates an hourly service into Norwich Monday-Friday between 7:16am-3:55pm. Returning there is a service from Norwich running from 09:20am- 5:45PM. The Saturday service runs at similar times as Monday-Friday. There is no service on a Sunday.

To the south of the site is the Little Plumstead Village Hall which also has a play area adjacent to it and is also used by the local pre-school. The Brick Kiln pub is located just north of the site. The

Little Plumstead Primary School is located within the hospital development area which is located to the south of the site and is approximately 1.4 miles in the car.

The nearest listed buildings are approximately 1.1km south west of the site and are the Manor House and a barn of the Manor House, both are grade II listed. There is no conservation area in the village.

The nearest statutory designations are the Bure Marshes National Nature Reserve, The Broads National Park, the Broadland RAMSAR site and the Bure Broads and Marshes Site of Special Scientific Interest are all located approximately 3.2 km north east of the site.

The next nearest statutory designation is South Walsham Fen Local Nature Reserve (LNR) which is located approximately 3.5km east of the site.

There are no Public Rights of Way (PRoW) or bridleways crossing the site. The site is located within flood zone 1 according to the Environment Agency flood risk maps.

The NNDR, which is currently under construction, will be located approximately 2.7km west of the site.

The site is currently outside but adjacent to the development boundary of Little Plumstead as identified in the adopted Broadland District Council Development Plan Proposals Map.

3. Site Location

GNLP0483 Site Boundary (please see Appendix 1)



Pending Outline Planning Application (20172209) Site Boundary (please see Appendix 1)



4. Site Opportunities

The site is promoted by Glavenhill Strategic Land Limited for development of the site for residential development.

Development of this site brings with it the opportunity to deliver a significant piece of infrastructure for the village which is identified within the Plumstead's Neighbourhood Plan. Community aspiration policy 4 seeks a roundabout at the Brick Kiln junction (located to the north east of the site). Improvements to this junction have been requested by the local community for many years with the Highway Authority looking at options previously but never progressing. Development of the site will allow this highway improvement to be delivered.

Part of the site is currently subject to an outline planning application as noted above. The application has been informed by a number of technical assessments which demonstrate that the site is suitable and appropriate to be developed. The application is submitted in outline with all matters reserved except access. The application proposes a single point of access from Salhouse Road to the east of the site and also the construction of a roundabout at the Brick Kiln junction.

An indicative layout has been submitted with the application which demonstrates how 84 dwellings could be laid out on the site taking into account the sites constraints, addressing the Council's policy requirements and respecting the context of the site and neighbouring residents.

The illustrative masterplan demonstrates:

- A low-density housing development which can incorporate significant areas of green infrastructure and open space which can link into existing areas of play space (including the play area currently adjacent to the village hall). This will be of benefit to the new and current residents;
- Delivery of a significant piece of highway improvement works identified by the village; and
- Retention of important natural features which exist on the site.

A number of the reports which were prepared to support the planning application covered the whole site as identified as site GNLP0483.

Ecology

An ecology survey has been undertaken across the whole GNLP0483 site and it identifies that the arable land, bracken, amenity grassland are all of negligible ecological value at the local level. The conservation margins support a moderate diversity of species and are therefore considered to be of negligible ecological botanical value. The site was found to have the potential to support commuting and foraging bats, nesting birds and low numbers of reptiles. The development of the site offers a number of ways to include ecological enhancement measures which if implemented will not result in the development causing any significant harms to biodiversity and will result in net gains in biodiversity.

Trees

An arboricultural impact assessment supports the application which assesses the trees and hedgerows which are located within the whole GNLPO483 site. The main area where hedgerow would need to be removed is in order for the access point and visibility splay to be achieved into Salhouse Road. The highway authority had requested that two access points and individual access points are proposed for the Salhouse Road frontage but following discussion with the planning officer it was agreed that one access point would be proposed and not having individual access points to minimise the amount of hedgerow that will be removed.

The County Ecologist and the Council's Arboricultural and Landscape Officers have raised no objections to the proposals subject to the imposition of conditions.

Heritage

An archaeological desk based assessment was undertaken with records showing that the site was occupied by a brickworks through the post-medieval period and into the first half of the 20th century. The site was subject to extensive clay extraction since the late 18th century and this will mean that there is negligible potential for the survival of any remains dating to these periods. The Historic Environment Service have raised no objection and recommended a condition is imposed which would require a programme of investigation.

There are no designated heritage assets within 1km of the site with the nearest listed buildings are approximately 1.1km south west of the site and are the Manor House and a barn of the Manor House, both are grade II listed. There is no conservation area in the village.

Flood Risk and Drainage

The site is situated within flood zone 1 as shown on the Environment Agency flood zone mapping but the site is over 1 hectare so a flood risk assessment (FRA) was carried out. The FRA determines that the risk of flooding is considered to be very low at the site. Site ground conditions generally comprise fine to coarse sand with good drainage characteristics. A sustainable approach to surface water run-off is proposed using soakaways for roofs and the adoptable highway run-off and permeable surfaces for the private roads and driveways.

Anglian Water have confirmed that there is capacity in the foul drainage catchment to accommodate the development.

Transport

The application is supported by a Transport Statement which assesses the evaluates the impacts the proposals may have on the local transport network, reviews local highway injury data and assesses the proposed vehicle trips which will be generated by the development. The TS also reviews the sites location and proximity of public transport options and other forms of transport other than the car. The closest bus stop to the site is located to the north of the site adjacent to the Brick Kiln junction and is served by the Konect Bus 5C service. This operates an hourly service into Norwich Monday-Friday between 7:16am-3:55pm. Returning there is a service from Norwich running from 09:20am- 5:45PM. The Saturday service runs at similar times as Monday-Friday. There is no service on a Sunday.

A speed and traffic survey were undertaken and this informed the access point design which will consist of a simple priority T-junction with visibility splays of 59m in both directions along Salhouse Road which is within highway land and the site boundary.

A significant benefit that the application will deliver is a roundabout at the Brick Kiln junction which is an aspiration of the Neighbourhood Plan (community aspiration policy 4). The exact specification of the roundabout is currently being discussed with the highway authority but the applicant and Glavenhill Strategic Land Limited have sufficient land within their control or in the ownership of the highway authority to deliver the necessary piece of infrastructure.

Ground Conditions

The north western part of the site which is not subject to the planning application was found to have clay soils and the BRE infiltration testing which was undertaken failed and therefore led to the residential development being located in the south eastern section. Whilst the application is not seeking approval at this time of this area there is potential at a later stage for this north western area being able to accommodate a small number of properties but accommodating a further significant area of green infrastructure which links into the Green Infrastructure Strategy which Lanpro have previously made representations on.

As noted under the previous representations (Green Infrastructure Strategy) in July 2016 by Lanpro, we have been working with a number of clients who have sites in and around the Norwich Policy Area (NPA) that can provide high quality green infrastructure corridors within easy access of growth locations and act as a benefit for shared developments. Further detail on this strategy can be found under question 53 of this submission.

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 build on the significant existing attributes of 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.

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.

The Greater Norwich area is currently in a unique position, where there is a recognition that growth is needed and a need for investment particularly on key infrastructure. This provides a clear opportunity for areas, particularly around the A11 corridor, a key role in delivering new settlements, sustainable developments and key infrastructure (including green infrastructure).

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

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 respect existing key characteristics.

We have serious concerns regarding the calculation proposed in the Regulation 18 consultation 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 new homes in the Plan period to 2036 in order to deliver the City Deals aspirations.

It is our submission that a new settlement in the Cambridge-Norwich Tech Corridor sitting alongside a range of smaller sites to be apportioned and located as set out in our response to Question 9 (including site GNLP0552) is the right approach to ensure a choice of sustainable sites

which will facilitate delivery of required housing numbers and infrastructure within the Plan Period up to 2036. Allocation of this site at Little Plumstead should form part of that strategy.

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 build on the significant existing attributes the area has to make the wider Norwich area a hub for investment, commercial activity and high-quality place making. This will be of benefit to all who live and work there.

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 7,200 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 indicated that sites for around 12,000 new homes were needed. Lanpro are surprised that this has reduced so significantly to 7200 in this current consultation. Lanpro do not consider this figure is sufficient to meet the housing requirement for Greater Norwich for the period to 2036.

Currently 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'. The methodology 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. The proposed methodology fails to consider economic objectives. There is no certainty that this methodology will come into effect, either in its current form, or at all and therefore cannot be relied upon.

We do not support the figure of 7,200 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

required dwellings per annum based upon a draft formula for the period 2016-2026, rather than for the period 2017 -2036. Furthermore, it fails to consider economic objectives for the area.

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 numbers 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. 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 should 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 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 (see qu6 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 (see qu6 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 would also question the deliverability of some of the existing 35,665 housing commitments. Further consideration should be given to these sites 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 7,200 homes is considered to be too low for the reasons set out above and 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 Plan Period up to 2036. Therefore, the Plan should not be reliant 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. 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.

We also consider that it is essential that healthcare requirements 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.

How should Greater Norwich grow?

Existing Housing Commitment

8. Is there any evidence that the existing housing commitment will not be delivered by 2036?

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 aware of any hard 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.

The Growth Options (options on pg.39-40)

9. Which alternative or alternatives do you favour?

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 7,200 set out within

the Growth Options Document. The reasons for the additional requirement are set out in our answers to questions 4-6 above.

In order to accommodate the additional numbers, Growth Option 3 should be amended as follows:

- 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 numbers (circa 1000 units) to the north-east on small/medium sites to provide short term delivery in this area which will 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.
1. Option 3 provides the opportunity to focus significant growth in an area which could 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.
 2. 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 under-estimated. 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.

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.

3. 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.
4. We consider that the 10,000-14000 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.
5. 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. We believe that this is a deliverable model.

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

As set out in our answer to Question 7, with any significant housing and employment growth there will be requirements for supporting infrastructure. 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.

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 provide greater control over housing trajectories.

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

12. Do you support the long-term development of a new settlement or settlements?
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?
<p>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.</p>
Norwich City Centre Defining the City Centre Area
14. Should the area defined as the city centre be extended?
N/A to this submission
Strategic City Centre Policy
15. Do you support the approach to strategic planning for the city centre in 4.80 above?
N/A to this submission
City Centre Offices
16. What should the plan do to reduce office losses and promote new office development in the city centre?
N/A to this submission
Retailing
17. What should the plan do to promote retailing in the city centre?
N/A to this submission
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?

N/A to this submission
City Centre Housing
19. What should the plan do to promote housing development in the city centre? N/A to this submission
Cultural, Visitor and Education Facilities
20. How can the plan best support cultural, visitor and educational uses in the city centre? N/A to this submission
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? N/A to this submission
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?
25. Do you favour the Village Cluster approach in option SH2?
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?
Section 6 – Topic Policies The Economy The Supply of Employment Land
27. What option or options do you support? (refers to options on pg.71-2) N/A to this submission
28. Which allocated or existing employment sites should be identified as strategic sites and protected? N/A to this submission
29. Are there employment areas that should be identified as suitable for release for residential uses? N/A to this submission
30. Are there any new employment sites that should be allocated? N/A to this submission
Accommodating Expenditure Growth
31. Should the position of any of the centres in the retail hierarchy be changed? N/A to this submission
32. Do any of the existing retail centres have scope to expand to accommodate further floorspace?

N/A to this submission

The Rural Economy

33. What measures could the GNLP introduce to boost the rural economy?

N/A to this submission

Access and Transportation

Strategic Transport Issues

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

N/A to this submission

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?

N/A to this submission

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 at this time. It is still too early to be sure what any changes to the NPPF will contain. 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 if relevant. This would then be supported 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 which 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 favour a hybrid approach (an amalgamation of AH3 and AH5) that allows for a viability assessment of larger sites to arrive at a deliverable affordable housing figure and a fixed percentage in smaller traditional housing sites (where overall viability will be easier to predict) delivering more than 11 dwellings. This will maximise housing delivery whilst also encouraging the developers of larger sites where infrastructure, finance and phasing costs are higher to deliver.

The obvious problem in the calculations used is that the 2017 SHMA conclusion figure is far too low as it makes no provision for the backlog over the JCS Plan period pre-2015; or the City Deal housing numbers that remain an unmet housing commitment agreed with Central Government and now seem to have been lost in the current calculations.

Tenure Split for Affordable Housing

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

We object to the current one-size-fits-all approach to housing tenure types and split as advocated under option AH6. The split needs to be informed by current and future local housing needs and investment strategies.

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 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.

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.

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?

N/A to this submission

Houseboats

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

N/A to this submission

Gypsies and Travellers

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

N/A to this submission

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

N/A to this submission

Travelling Showpeople

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

N/A to this submission
47. Are there any suitable sites for Travelling Showpeople accommodation you wish to submit? N/A to this submission
Residential Caravans/Park Homes
48. Do you support the favoured option for residential caravans and park homes? N/A to this submission
49. Are there any potential locations for new/expanded residential caravan sites that you wish to propose? N/A to this submission
Climate Change
50. Do you support the favoured option for climate change policy? N/A to this submission
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) N/A to this submission
Flooding
How Should Flooding and Flood Risk be Covered in the GNLP?
52. Do you support the favoured option for flood risk policy? N/A to this submission
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)

Lanpro 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 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 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, 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.

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

Landscape

Landscape Character and Protection

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

Lanpro 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.

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.

Lanpro 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?

Lanpro 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?

N/A to this submission

Water

58. Do you support option W1?

N/A to this submission

Communities

Location of Affordable Housing within Sites

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

N/A to this submission

Health Impact Assessments

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

N/A to this submission

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. An additional indicator that could be included is the provision of self build plots, particularly if Policy Option AH7 is drafted to include provision of self-build plots.

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 HELAA capacity assessment December 2017 has assessed the suitability and availability of 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.

Lanpro have commissioned more detailed technical assessments on a range of issues from specialist consultants which have been summarised in Section 4 above. The conclusions of those assessments can be found below. These have enabled us to draw more detailed conclusions on the suitability of this site as set out below:

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

Access, Transport and Roads

The pending planning application proposes an access point onto Salhouse Road which is capable of achieving a safe access point and the necessary visibility splays. The application is able to propose new footpath linkages which will connect the site into the existing network.

Accessibility to Services

The planning application demonstrates that the site is easily connected to local services either within walking distance or within easy access of bus services.

Utilities

The applicant has undertaken utility enquiries with all of the statutory utilities providers and the following has been provided:

Electricity – There will be a need to divert/underground the existing overhead high voltage lines and an estimate has been provided by UK Power Network. A ground mounted substation will be needed within the site which will replace the existing pole mounted transformer on the Norwich Road/Salhouse Road junction.

Gas – There is sufficient capacity in the local network for the development as confirmed by Cadent Gas.

Potable Water – Anglian Water have advised that there will need to be some strategic upgrades to accommodate the development. The applicant is aware of this.

Sewage – Anglian Water have confirmed that there is sufficient capacity within the Whitlingham Trowse Water Recycling Centre.

There are no utility restrictions which would prevent development of this site.

Contamination and Ground Stability

A Phase 1 desk study has been carried out and has identified that there is medium probability of contamination existing across the site, primarily due to the previous use of the site as a brickworks, railway sidings and activities associated with the brickworks. Contamination may have leached into the sub-soils. A Phase 2 investigation is recommended within the report and the Councils pollution control officer is content to deal with this through a planning condition requiring this work to be undertaken prior to commencement of development.

Flood Risk

The site is located within flood zone 1. A surface water drainage strategy and Flood Risk Assessment has been completed as part of the planning application and has found that the development of the site will not cause flood risk issues on or off site. The drainage strategy demonstrates that the site can benefit from using infiltration testing which is in accordance with the Lead Local Flood Authority drainage hierarchy.

Market Attractiveness

The site is being promoted by a land promotion company who have also submitted the planning application. They are in discussions with developers who have built in the area and are confident that there is a market for dwellings in this location.

Landscape and Townscape

Development of the site is able to retain a considerable amount of the existing vegetation which includes boundary hedging and trees within the central tree belt. There is sufficient space for new planting to be introduced into the site to help minimise any impact on the surrounding landscape.

The site is not located within a sensitive landscape as defined and is just defined as open countryside. The site is within the airport safeguarding zone but as part of their consultation response on the planning application, Norwich Airport have confirmed that they raise no objection provided that any future landscape proposals do not attract birds, particularly waterfowl to the site.

The outline planning application demonstrates that the site can be developed in a form which respects the surrounding context and is similar density.

Biodiversity and Geodiversity

An ecology survey has been undertaken across the whole site and it identifies that the arable land, bracken, amenity grassland are all of negligible ecological value at the local level. The conservation margins support a moderate diversity of species and are therefore considered to be of negligible ecological botanical value. The site was found to have the potential to support commuting and foraging bats, nesting birds and low numbers of reptiles. The development of the site offers a number of ways to include ecological enhancement measures which if implemented will not result in the development causing any significant harms to biodiversity and will result in net gains in biodiversity.

An arboricultural impact assessment supports the application which assesses the trees and hedgerows which are located within the whole GNLPO483 site. The main area where hedgerow would need to be removed is in order for the access point and visibility splay to be achieved into Salhouse Road. The highway authority had requested that two access points and individual access points are proposed for the Salhouse Road frontage but following discussion with the planning officer it was agreed that one access point would be proposed and not having individual access points to minimise the amount of hedgerow that will be removed.

The County Ecologist and the Council's Arboricultural and Landscape Officers have raised no objections to the proposals subject to the imposition of conditions.

Historic Environment

An archaeological desk based assessment was undertaken with records showing that the site was occupied by a brickworks through the post-medieval period and into the first half of the 20th century. The site was subject to extensive clay extraction since the late 18th century and this will mean that there is negligible potential for the survival of any remains dating to these periods. The Historic Environment Service have raised no objection and recommended a condition is imposed which would require a programme of investigation.

There are no designated heritage assets within 1km of the site with the nearest listed buildings are approximately 1.1km south west of the site and are the Manor House and a barn of the Manor House, both are grade II listed. There is no conservation area in the village.

Open Space

The site allows for significant areas of open space and green infrastructure within it whilst still achieving a density which is considered acceptable given the surrounding context. The open space

can be a combination of formal and informal spaces and can be linked to the existing play space adjacent to the village hall to the south of the site.

Compatibility with Neighbouring Uses

The site is surrounded by residential development on the south, east and northern boundaries.

Taking account of the above and the assessment work that has been undertaken as part of the outline application, the site is SUITABLE for development and there are no constraints to allocation of this site for residential purposes.

7. Conclusions

Site GNLP0483 has been shown within this representation to be suitable and deliverable for residential development. This position is supported by the current pending outline application which is waiting for determination by Broadland District Council and the consultation responses which have been received to date.

The site is well located within Little Plumstead which is linked with Great Plumstead and is identified as a Service Village within the adopted Joint Core Strategy. This designation means that Little Plumstead is an appropriate location for new development.

The allocation would create an infill development between the main village to the south and the dispersed development to the north which is focused around the Norwich Road/Salhouse Road junction. The development will also bring forward a significant piece of highway infrastructure which is of benefit to the village and is identified within the adopted Neighbourhood Plan.

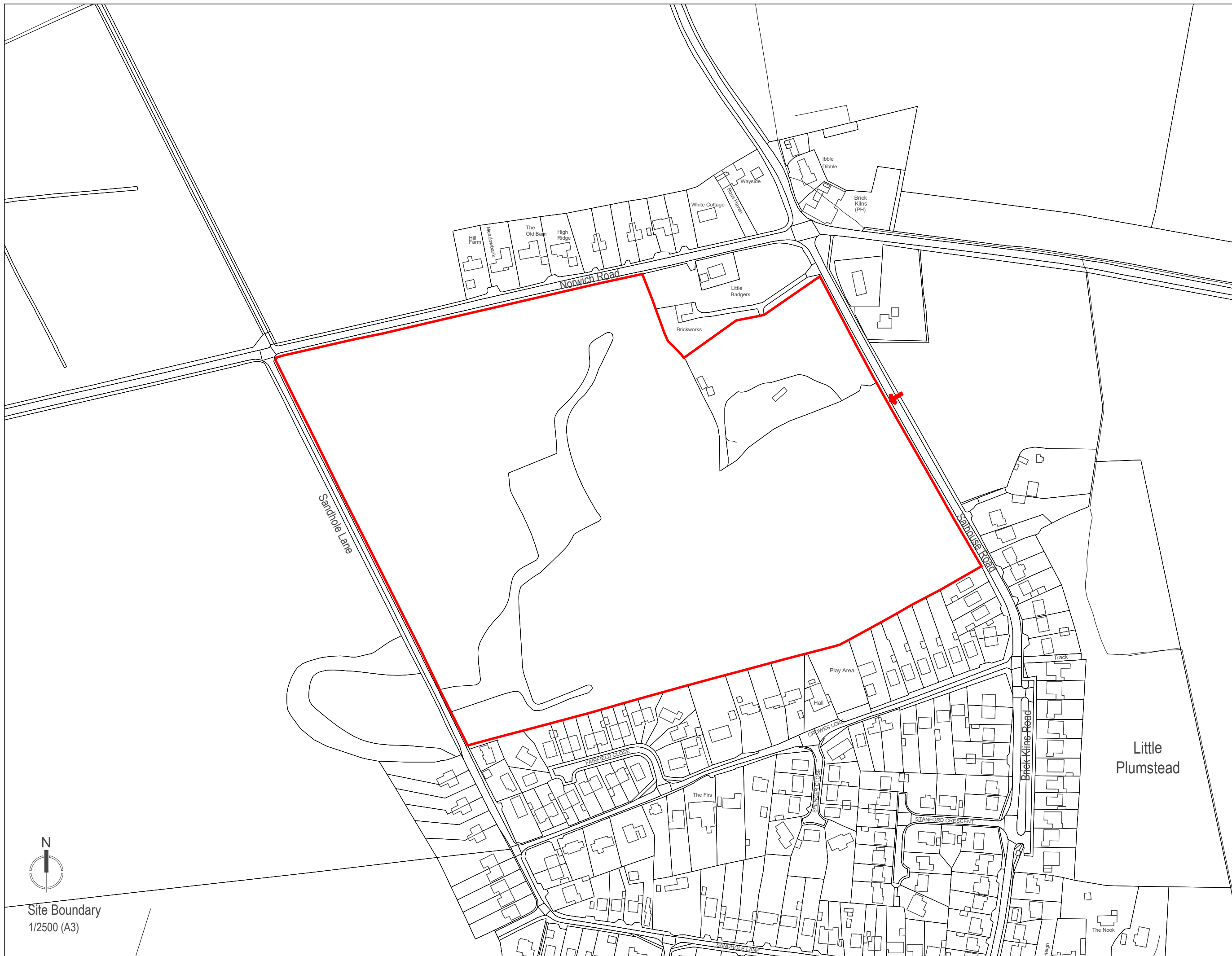
There are no overriding constraints that would prevent this site from being developed for a mix of housing and green infrastructure provision.



Appendices



Appendix 1



Note

SUMMARY

- Site Boundary
- ➔ Access

Site Area 11.38 Ha

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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

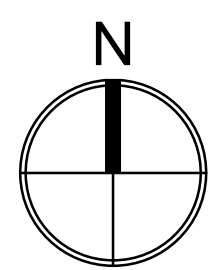
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Brettingham House, 98 Pottergate,
 Norwich, NR2 1EQ
 01603 631 319
 www.lanproservices.co.uk



Site Boundary
 1/2500 (A3)



Licence number LIG0975

Location Plan 1:1250 @ A1

10 0 10 20 30 40 50 100m



1:1250

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<http://www.hse.gov.uk/construction/2015/responsibilities.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 Glavenhill Strategic Land (No.12) Limited			
DRAWING TITLE Indicative Masterplan		SCALE 1:1250	
DATE Dec 2017	DRAWN BY TUJ	CHECKED BY TUJC	APPROVED BY JC
DRAWING NUMBER 0555 - 00 - 002	PROJECT NO	TYPE	UNIQUE NO / REVISION
 (Architecture and Urban Design)			
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