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## **Greater Norwich Local Plan: Regulation 18 Consultation General Response Form**

Thank you for responding to the Regulation 18 consultation on the emerging Greater Norwich Local Plan. If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

It is easier to respond online at [www.gnlp.org.uk](http://www.gnlp.org.uk). If you cannot do this, please use this form to respond to the:

- Growth Options document – there are 66 questions covering the Vision and Objectives, Strategy and Topic Policies. There is no need to answer all the questions – just respond to those you are interested in;
- Site Proposals document for commenting on submitted sites and development boundaries (you'll need the Site Submission form to submit additional sites);
- Interim Sustainability Appraisal;
- Evidence Base.

All documents are available from [www.gnlp.org.uk](http://www.gnlp.org.uk)

Hard copies of the documents are available at consultation "Deposit Points" at:

- County Hall, Martineau Lane, Norwich (main reception);
- City Hall, St Peters Street, Norwich (2<sup>nd</sup> floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

### **Submitting your Response Form**

Responses should be made electronically on the webform which is available at [www.gnlp.org.uk](http://www.gnlp.org.uk). Alternatively this response form can be downloaded and submitted by email to [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Completed hard copy forms can also be sent to:

*Greater Norwich Local Plan Team*  
PO Box 3466  
Norwich  
NR7 7NX

All submissions should be made on or before **5pm on Thursday 15 March 2018.**

Please note that anonymous submissions cannot be accepted.

Contact Details	
Title	Dr
First Name	ROBERT
Last Name	CURTIS
Job Title (where relevant)	
Organisation (where relevant)	/
Address	
Post Code	
Telephone Number	
Email Address	

**Please make your comments below. Please use a separate form if you are commenting on more than one document. Please clearly state the paragraph and page number your comments refer to.**

Document (please tick as appropriate)		
Growth Options consultation document	Site proposals consultation document	Interim Sustainability Appraisal
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Evidence Base	Caravans and Houseboats	<input type="checkbox"/>
	Employment, Town Centres and Retail Study	<input type="checkbox"/>
	Habitats Regulation Assessment (HRA)	<input type="checkbox"/>

Evidence Base	New Settlements Topic Paper	<input type="checkbox"/>
	Strategic Flood Risk Assessment (SFRA) <sup>1</sup>	<input type="checkbox"/>
	Strategic Housing Market Assessment (SHMA)	<input type="checkbox"/>
	Viability Study	<input type="checkbox"/>
	Housing and Economic Land Availability Assessment (HELAA) <i>SUITABILITY ASSESSMENT</i>	Please respond to the Site Proposals document quoting the site reference number if you have comments to make on individual site summaries or on the HELAA process

**Comments (please clearly state the paragraph and page number your comments refer to). You can respond to as many questions as you wish below, but if you are responding to more than one document, please submit a separate form for each document.**

*Please see attached documents.*

*5 Attached sheets.*

<sup>1</sup> Please note that whilst a hard copy the main SFRA document is available at the Deposit Points, the remaining documents (maps etc.) are only available online – follow the links from [here](#))

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**Please add additional sheets if necessary**

**Disclaimer**

Data Protection and Freedom of Information  
The Data Controller of this information under the Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

**Declaration**

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes mentioned in the disclaimer above.

Date 1/3/18

## Greater Norwich Regulation 18 General Response Form

FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

Your completed form should be returned to the Greater Norwich Local Plan team no later than **5pm on Thursday 15 March 2018**.

By email: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Or, if it is not possible submit the form electronically,

By post to:

Greater Norwich Local Plan Team  
PO Box 3466  
Norwich  
NR7 7NX

Further advice and guidance can be obtained by visiting the Greater Norwich Local Plan website or by contacting the Greater Norwich Local Plan team directly:

Website: [www.gnlp.org.uk](http://www.gnlp.org.uk)  
E-mail: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)  
Telephone: 01603 306603

## **Marlingford and Colton**

The following comments relate to the Suitability Assessments made for the HELAA Capacity Assessment. They relate to Site GNLP0424 (page 693) and Site GNLP 0475 (page 699). Others in Marlingford and Colton will be considered separately.

### 0424

Although promoted as being appropriate around a present small development this latter group must be recognised as quite exceptional having been accepted as affordable housing. Without this dispensation from the District Council there would certainly have been no development in Marlingford Road and there is no justification for development now as the reservations in the assessment clearly suggest.

### 0475

This present response concentrates on site 0475, to the south side the Ugly Bug Public House (now the Norfolk Lurcher). If developed according to District Council guidelines the site could accommodate around 50 houses.

The "Suitability Assessment" considers this site suitable for development but lists a number of significant problems and disadvantages. It is important to emphasise these and draw attention to the Inspectors Report of 8 March 2016 from the Planning Inspectorate, (copy attached) responding to an appeal over a planning application for a site on the north side of the public house. This can be regarded as a mirror of the present proposal for the south side. In particular, the Inspector in his report (para. 7) drew attention to the lack of public resources in this area, the extent of which would not provide a sustainable location for any significant new developments..

He also drew attention, in paras. 10 and 11, to the difficulty of access via the very narrow High House Farm Lane which is not just "constrained" but is totally inappropriate for extra traffic. Any additional traffic will present an unacceptable hazard – traffic of large vehicles to Viking Nurseries already causes difficulties. It is significant that the Assessment itself notes that "the local road network is unsuitable".

The Inspector emphasised the importance of the Colton Development Boundary where 0475 clearly stands outside. The present proposal rides rough shod over a feature strongly supported in the Local Parish Plan and confirmed in South Norfolk District Council's Plans. The boundary has been in place since at least the early 1980's and was obviously an important consideration in the Inspector's report. It is important note that the limited commercial developments which have recently occurred on the western edge of Colton outside of the boundary have been entirely based on the re-use of derelict buildings and land which originally made up High House Farm, west of High House Farm Road.

There are other issues mentioned in the "Suitability Assessment" which require detailed consideration. The sewerage network which would be required is particularly important. As it stands the public sewerage in Colton does not extend beyond the Ugly Bug and

anything less than a comprehensive extension would be essential; nothing less than main drainage should be permitted. Any disposal system based upon e.g. digesters, subsoil drainage etc., would result in the large land drainage system in this particular Grade 2 land becoming the origin of a major environmental problem. The system, a component of the original fruit farm, drains directly into Colton Horse Pond and then under Norwich Road to the River Tud. The "low risk of flooding" quoted for this site is certainly related to the extensive land drain system and this should not be compromised.

At the same time it must be questioned whether the pumping station at Honingham Thorpe Farm would have the capacity to pump an additional major sewerage load away from Colton to Barford, as is currently the practice.

Finally, it is suggested that 0475 could be used "for residential development, holiday accommodation and/or accommodation related to the expanding Barnham Broom Golf and Country Club". This is unrealistic. An expanding club should be able to provide space on its present site and the present access to the club from Colton is ridiculously inadequate – an extremely narrow lane with high banks making even the present limited traffic very dangerous. 0475 is clearly intended for residential development in a position involving "back planning", always considered undesirable, immediately behind seven properties facing Norwich Road.

Taking all of these considerations into account it is difficult to see any case for development of this site.

## Appeal Decision

Site visit made on 9 February 2016

**by Stephen Normington BSc DipTP MRICS MRTPI FIQ FIHE**

an Inspector appointed by the Secretary of State for Communities and Local Government

**Decision date: 08 March 2016**

**Appeal Ref: APP/L2630/W/15/3136454**

**Land off High House Farm Lane, Colton, Norfolk NR9 5DG**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Mr & Mrs T Crowland against the decision of South Norfolk District Council.
- The application Ref 2015/1148, dated 19 May 2015, was refused by notice dated 20 July 2015.
- The development proposed is the erection of a timeshare swimming pool building and associated residential accommodation.

### Decision

1. The appeal is dismissed.

### Procedural Matters

2. The Council's statement refers to the status of the South Norfolk Local Plan Development Management Policies Document (2015)(DMP). This was adopted on 26 October 2015 and after the submission of this appeal. This plan, together with the Joint Core Strategy for Broadland, Norwich and South Norfolk (amended 2014)(JCS) and the South Norfolk Local Plan Site Specific Allocations and Policies Document (2015) now forms part of the 'development plan' for planning decisions in the District.
3. The DMP now supersedes Policies ENV8, LEI 2 and LEI 6 of the South Norfolk Local Plan (2003) which were referred to in the Council's Decision Notice. The Council's statement sets out a number of new policies contained within the recently adopted plan that may be relevant to the consideration of this appeal. However, the Council have not provided any evidence to indicate how any of these policies relate to the circumstance in this appeal.
4. From my assessment of the policies it appears to me that Policy DM 1.3 of the DMP is the most relevant to the circumstances in this appeal. I have therefore determined this appeal on the basis of the up to date policy position.

### Main Issue

5. The main issue is whether the proposal represents a sustainable form of development that would not cause harm to the character of the area.



## Reasons

6. The appeal site is located to the west of the village of Colton and comprises part of an existing rectangular agricultural field positioned at the junction of High House Farm Lane and Norwich Road. The site would occupy the south west portion of the field with access to be provided off High House Farm Lane. The proposal is to erect a timeshare swimming pool and a detached two storey dwelling to provide accommodation for the caretaker of the pool.
7. Colton is defined as an 'other village' in Policy 16 of the JCS which are villages that have defined development boundaries to accommodate infill or small groups of dwellings and small-scale businesses and services. The supporting text to this policy explains that such villages have few or no local services and would not provide a sustainable location for any significant new development. The appeal site is located outside of the defined development boundary for Colton.
8. Policy DM 1.3 of the DMP relates to the sustainable location of new development and explains that new development should normally be located within the defined development boundaries of settlements. The supporting text to the policy states that the area outside of the defined development boundaries is countryside in planning policy terms where only in exceptional cases will development proposals be supported by the Council. The policy further explains, amongst other things, that development outside the settlement boundary will only be granted if it demonstrates overriding benefits in terms of economic, social and environmental dimensions.
9. I note the desire of the appellant to provide a dwelling and swimming pool that contributes to the rural economy. I have also taken into account the guidance contained within paragraphs 28 and 55 of the National Planning Framework (the Framework). Whilst paragraph 28 supports sustainable rural leisure developments which respect the character of the countryside, paragraph 55 seeks to avoid isolated houses in the countryside and highlights that new housing in rural areas should be located where it would enhance or maintain the vitality of rural communities.
10. Whilst I note the appellant's view that the site is within walking and cycling distance for Colton and the surrounding area, the Council indicate that there are no public footpath links to the site and a lack of any regular nearby public transport. While conducting my site visit I noted that, in addition to there being no footways linking the site to the main body of the village and wider area, the highway in the vicinity of the site is unlit. Consequently, users of the pool and the occupants of the dwelling would be very likely to rely on the private car for the majority of their journeys. This would be contrary to one of the core principles in the Framework (paragraph 17).
11. Although the site is located close to The Ugly Bug Inn and while there are a small number of other dwellings in the immediate vicinity, I observed at my site visit that the surrounding area contained few facilities or services. Whilst the proposed development would provide some limited employment, it would at best only marginally enhance the vitality of the rural community. In my view, the economic benefits of the proposal would not be sufficient to justify development outside of the settlement boundary as indicated in Policy DM 1.3.

12. The proposed swimming pool would be a timeshare facility; a shared but private enterprise rather than a publicly accessible facility. Notwithstanding the appellants survey of potential users, no evidence has been provided to indicate how, what would essentially be a private facility, would benefit the wider community. I have also taken into account the views of the Council which indicate that a previous survey undertaken for Colton and Marlingford as part of the preparation for the Local Development Framework did not identify the need or desire for such facility. Consequently, I do not consider that an overriding social benefit has been demonstrated sufficient to justify development outside of the settlement boundary.
13. Notwithstanding the fact that there are other properties in the locality, the proposed development would be in the countryside and in an unsustainable location. Whilst its location may be no more unsustainable than the neighbouring properties, unsustainable development should not be perpetuated in areas with few or no facilities.
14. In my view, the current undeveloped field makes a positive contribution to the character of the area and provides an established rural and open aspect in the approach to the village from Norwich Road and High House Farm Lane. The proposal would represent the incursion of piecemeal development into the countryside which would significantly alter the appearance and rural character of the field in both views from the road and the wider rural setting. This would have a detrimental impact on the rural character of the area and undermine the Council's approach to concentrate development within settlement boundaries.
15. As a result, I consider that the proposed development would constitute sporadic and unsustainable development that would harm the character of the countryside and for which there are no overriding economic or social benefits. It would not represent a suitable or sustainable location for development as required Policy DM 1.3 of the DMP. As such it would be contrary to this policy.

*Other matters*

16. I accept that the proposed dwelling would make a useful yet very small contribution to housing supply in the District bearing in mind the evidence that the Council cannot currently demonstrate a Framework compliant supply of housing land. However, this along with the other matters identified in the evidence as potentially weighing in favour of the proposed development, does not outweigh the significant harm identified above such that the proposal would constitute unsustainable development in the countryside.

**Conclusion**

17. For the above reasons, and taking into account all other matters raised, I conclude that the appeal should be dismissed.

*Stephen Normington*

INSPECTOR