

**Reg. 19 GNLP
Consultation
Statement**

GNLP 3003

**Land off Mill Road,
Reedham,
Norfolk,
NR13 3TL**



www.parkerplanningservices.co.uk

Prepared for Client:
Mr Nigel Patrick Key



PREPARED BY: Magnus Magnusson, MRTPI.

Our Offices:

NORFOLK	T: 01603 516319	Norwich	NR20 3LR
SUFFOLK	T: 01284 336348	Bury St Edmunds	IP33 1HQ
CAMBRIDGESHIRE:	T: 01223 637283	Cambridge	CB24 6WZ
LINCOLNSHIRE	T: 01780 437333	Stamford	PE9 2AE
ESSEX	T: 01245 934184	Chelmsford	CM2 7PX

REPORT INFORMATION

© Copyright Parker Planning Services Ltd.

No part of this report is to be copied or reproduced, both physically and/or electronically in any way without prior written consent of Parker Planning Services Ltd.

While every reasonable effort has been made to provide accurate and detailed information to the relevant professional standards at the time of writing of this report. However, Parker Planning Services Ltd. cannot be held responsible for errors, inaccuracies or omissions held within this report where 3rd party information has been used. Nor can the information in this report be used for works outside the remit of a *Reg. 19 Consultation Response*.

Date of Submission	February 2021
Consultation	Regulation 19 Greater Norwich Local Plan Consultation
Local Planning Authority	Greater Norwich (Broadland)
Client	Mr Nigel Patrick Key
Our Reference	2395
Report Revision	V1.0



Contents

1.0 Introduction

2.0 Site Assessment - Suitability, Availability, Achievability (including viability)

3.0 Regulation 19 - Test of Soundness

4.0 Conclusions

*Appendix A – Regulation 19 Consultation Draft Site Allocation Policy
GNLP3003*

1.0 Introduction

- 1.1 The Greater Norwich Local Plan (GNLP) is being prepared by the Greater Norwich Development Partnership (GNDP) and will cover the plan period to 2038, identifying sites for new homes, jobs and infrastructure.
- 1.2 The GNLP has reached the Regulation 19 preparatory stage and the GNDP are, as part of their current consultation, seeking views on the 'soundness' and 'legal compliance' of their GNLP as drafted and as proposed for submission to the Secretary of State, to be followed by an examination in public (EiP).
- 1.3 My client's site at Mill Road, Reedham (Council Reference GNLP3003) is identified as a residential allocation within the context of the Reg. 19 consultation draft GNLP. The intention of this statement is to reaffirm the *suitability, availability* and *achievability* of my client's site for allocation within the context of the GNLP and to confirm that the GNLP's strategy, as it this pertains to the allocation of sites within the settlement of Reedham, is a 'sound' one.
- 1.4 It is not the intention of this *Consultation Statement* to provide contextual information that has been submitted at a previous stage(s) in the Local Plan preparation process and including the content of our *Site Supporting Information Statement* submitted alongside our response to the previous round of consultation (Regulation 18 Stage) in March 2020.
- 1.5 This consultation response considers all relevant aspects of the Planning Practice Guidance (PPG) and National Planning Policy Framework (NPPF) that has informed the GNDP's approach to preparing the GNLP. All plan-making bodies are expected to have regard to the provisions of both the PPG and NPPF in the requisite Local Pan preparatory stages.
- 1.6 We can confirm that, for the reasons outlined within this statement, our client's site is ***suitable, available*** for development now and ***achievable*** and would be appropriate for residential development. Furthermore, our client can confirm that delivery of their site is economically viable.
- 1.7 Furthermore, we consider the principle of the allocation of our client's site to be 'sound' one. Given the status of Reedham in the 'Settlement Hierarchy'

(i.e., its relative sustainability for growth), the location of my client's site within this settlement, in addition to the extent of the land under his control, the wider site area could be allocated (fig. 1.1 below) thus providing an uplift in housing provision for the settlement and sub-region as a whole. Such an 'uplift' would create greater 'flexibility', allowing the GNLP to respond rapidly to changes in circumstance in the plan-period.

1.8 The sites allocation is subject to the provision of appropriate access arrangements and as is being considered in respect of the emerging *Statement of Common Ground* that is being drafted alongside Officers of the GNLP.

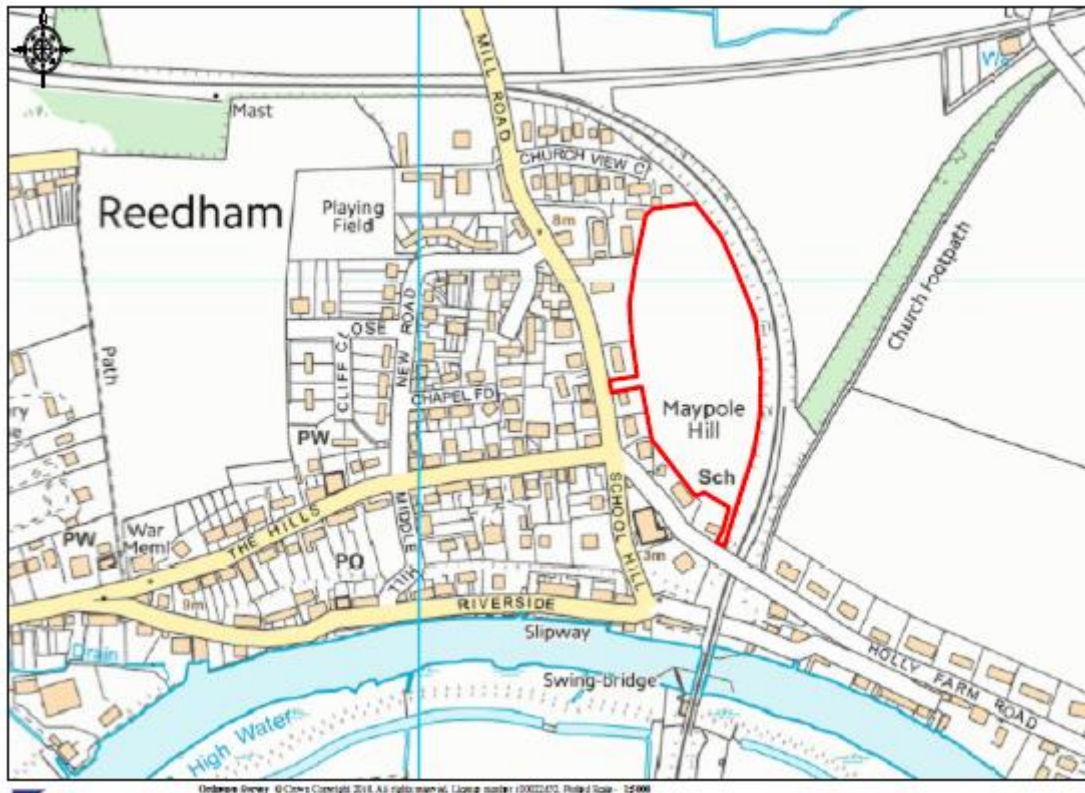


Fig. 1.1 – Plan illustrating the full extent of my client's site at Mill Road, Reedham, the Southern part of which is proposed for allocation in the GNLP (site/policy ref. GNLP 3003).

2.0 Site Assessment - Suitability, Availability, Achievability (including viability)

Suitability

- 2.1 Reedham has been designated as a *Village Cluster in its own right* within the context of the Spatial Strategy on the basis of its level of 'Core' and 'Secondary' service provision. The settlement is therefore considered to be a relatively sustainable location for new development.
- 2.2 The settlement of Reedham is well related to higher order settlements including the City of Norwich, which lies just 11 miles to the north-west and Great Yarmouth, 6 miles to the east, where there a full range of services and facilities available for current and future residents of this *Village Cluster*. Reedham is well served by bus services including 73 (Reedham - Acle), 73C (Acle – Great Yarmouth).
- 2.3 As well as the primary school, Reedham has a range of facilities that include a food shop, pub, village hall, church, and public transport.
- 2.4 In addition to the existing commitment of 1,146 homes in the *Village Clusters* in Broadland, new site allocations are made in the GNLP Sites Plan for 482 dwellings in the plan period. The consultation draft GNLP considers that, as well as existing allocations and windfall development, 60 new homes are appropriate for Reedham itself.
- 2.5 Following appropriate assessment of sites within the context of the Housing and Economic Land Availability Assessment (HELAA) and SA/SEA processes (tables 1.1. and 1.2 below), two sites are identified as appropriate housing allocations (including my client's site GNLP3003), providing for the 60 new homes in the 'cluster'. There are no carried forward residential allocations but there is a total of 27 additional dwellings with planning permission on small sites. This gives a total deliverable housing commitment for the 'cluster' of 87 homes between 2018 – 2038.
- 2.6 My client's site off Mill Road is allocated for residential development due to its immediate proximity to Reedham Primary School and the fact that it has

minimal other constraints. However, it is accepted that it is not possible to provide an off-carriageway pedestrian footway to the school.

2.7 The site is currently allocated subject to vehicular access via Mill Road and pedestrian only access at Holly Farm Road. The vehicular access point at Mill Road will require visibility over the frontage of 'The Brambles' to the north which may require 3rd party land. Appropriate access arrangements are being considered alongside the GMLP and within the context of the Statement of Common Ground (SoCG).

2.8 The Regulation 19 draft Site Allocation policy is found at appendix A.

Availability

2.9 A site will normally be considered available by the Council if it is in the ownership of a developer or landowner who has expressed an intention to develop or sell land for development. Site GMLP3003 is under the control of a single landowner who is actively promoting the site for development within the emerging GMLP process. Indeed, PPS are working with Officers of the GMLP in the preparation of a *Statement of Common Ground* to confirm the 'deliverability' of my client's site.

Achievability (including viability)

2.10 A site will be considered achievable within the context of the HELAA/Local Plan where there is a reasonable prospect that development will occur on the site at a point in time. A key determinant of this will be economic viability of the site. This will be influenced by the market attractiveness of a site, its location in respect of property markets and any abnormal constraints on the site.

2.11 It is considered that development on this site is viable, being in an area with considerable demand for both market and affordable dwellings. Indeed, the Community Infrastructure Levy (CIL) is applied to new developments in Reedham which in itself proves that development must be viable.

2.12 Furthermore, there are no abnormal constraints pertaining to the site, i.e.,

'reds' in the context of the RAG assessment – undertaken as part of the HELAA (table 1.1 below).

Site Reference	Categories														
	Site access	Access to services	Utilities Capacity	Utilities Infrastructure	Contamination/ground stability	Flood Risk	Market attractiveness	Significant landscapes	Sensitive townscapes	Biodiversity & Geodiversity	Historic environment	Open Space and GI	Transport & Roads	Compatibility with neighbouring uses	
	Reedham														
GNLP1001	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green
GNLP3003	Amber	Green	Amber	Green	Green	Amber	Green	Green	Green	Amber	Green	Green	Green	Amber	Green

Table 1.1: Stage 2 HELAA Comparison Table for Reedham. Source: Reg. 19 Consultation Draft GNLP Document (Reedham Booklet. P.3).

Policy Ref	SA Objective														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity, Geodiversity & GI	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport & Access to Services	Historic Environment	Natural Resources, Waste & Contaminated Land	Water
GNLP3003	-	+	0	0	+	+	+	-	+	+	+	+	0	0	-

Table 1.2 Pre-mitigation impact matrix for site/policy GNLP3003 (Reg.19 SA/SEA)

3.0 Test of Soundness

3.1 Para. 35 of the NPPF identifies how Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development,
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence,
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground and,
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

3.2 PPS wholly support the inclusion of the site GNLP3003 within the GNLP as a residential allocation. PPS submit that Policy GNLP3003 is both 'sound' and legally compliant. The allocation will deliver housing against the identified and demonstrable need for new homes in Reedham and the sub-region in more general terms.

3.3 The Reg. 19 Consultation Draft GNLP makes provision for 49,492 new homes across the sub-region in the period 2018-38. Following appropriate assessment of sites within the context of the Housing and Economic Land Availability Assessment (HELAA), and SA/SEA processes (tables 1.1 and 1.2 above), two sites were identified as appropriate or 'suitable' housing allocations (including my client's site GNLP3003), providing for 60 new homes in Reedham.

3.4 There are no carried forward residential allocations but there is a total of 27 additional dwellings with planning permission on small sites. This gives

a total deliverable housing commitment for the *Village Cluster* of 87 homes between 2018 – 2038. Our client is committed to delivering a minimum of a minimum of 30 of these new homes on his site as prescribed by Policy GNLP3003 (appendix A).

- 3.5 NPPF (para. 23) is clear insofar as Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.
- 3.6 We contend that our client’s wider site area could provide an uplift in housing provision to meet the needs of Reedham and the Sub-region in the plan-period. Such an uplift in housing provision would provide the flexibility to adapt to rapid change and as required by Paragraph 11(a) of the NPPF (2019).
- 3.7 Indeed, and in order to be genuinely plan-led (NPPF, para. 15) and to ensure that the GNLP is ‘effective’, the GNLP might consider seeking additional allocations now through the plan-making process to provide an additional supply buffer. Additional allocations will also ensure the plan is ‘positively prepared’ to meet minimum identified housing needs including the unmet needs of the sub-region more generally in addition to those of adjoining Local Authority areas.
- 3.8 The Regulation 19 GNLP growth strategy as drafted relies on ‘unplanned’ development to meet the total housing ‘potential’ figure of 49,492 dwellings in the form of ‘windfall’ and dwellings delivered via Policy 7.5. An ‘uplift’ on my client’s allocation would make the GNLP less reliant on such ‘unplanned’ developments which may or may not come forward in the plan period at the rate identified within the draft Plan.
- 3.9 Such an approach would conform with one of the Government’s planning reforms as espoused in their *Planning for the Future White Paper*, that was consulted upon in the Autumn of 2020, whereby LPAs would be required to identify a stock of reserve sites which could come forward for development if needed. Such reserved sites or ‘over allocations’ are intended to allow

flexibility in plan-making and respond to situations where, for example, an allocated site has deliverability issues and cannot come forward for development as planned.

3.10 To conclude in terms of issues of 'soundness', PPS contend that the allocation of our client's site (GNLP3003) and indeed the GNLP strategy of Reedham meets the tests of 'soundness' as espoused by the *Framework* in the following respects:

- **Positively prepared** – The strategy for Reedham and allocation provides an appropriate growth strategy that goes some way to meeting objectively assessed needs, albeit an uplift in housing provision could allow for greater flexibility in the plan-period.
- **Justified** – The strategy for Reedham and allocation provides an appropriate strategy that is commensurate with Reedham's status in the 'Spatial Strategy'. Our client's site is a 'justified' allocation (when compared with the alternatives) as evidenced via the HELAA and SA/SEA processes.
- **Effective** – The allocation ensures that the GNLP includes a site allocation that is demonstrably deliverable over the plan period.
- **Consistent with national policy** – Delivery of my client's site will contribute to enabling the delivery of sustainable development in accordance with the policies in this Framework.

4.0 Conclusions

- 4.1 For the reasons outlined within this Statement, my client's site, GNLP3003, is considered *suitable, available* and *achievable*. Furthermore, it is considered that the strategy for Reedham and the Policy (allocation) GNLP3003 specifically, is 'sound' and 'legally compliant'.
- 4.2 Additional land under my client's ownership is also suitable, available and achievable (see fig. 1.1) and its allocation, alongside site reference GNLP3003, would allow greater flexibility in plan-making and allow the GNDP to respond rapidly to changes in circumstances in the plan-period.
- 4.3 Appropriate access arrangements are being further considered in respect of the *Statement of Common Ground* being prepared with Officers of the GNDP.
- 4.4 Parker Planning Services would like to be kept up to date with the progress of the GNLP and reserve the right to participate in the forthcoming Examination Hearings. For further information, or to discuss, please contact Magnus Magnusson on 01284 336119 or magnus@parkerplanningservices.co.uk.

Appendix A – Regulation 19 Draft Site Allocation Policy (GNLP3003)

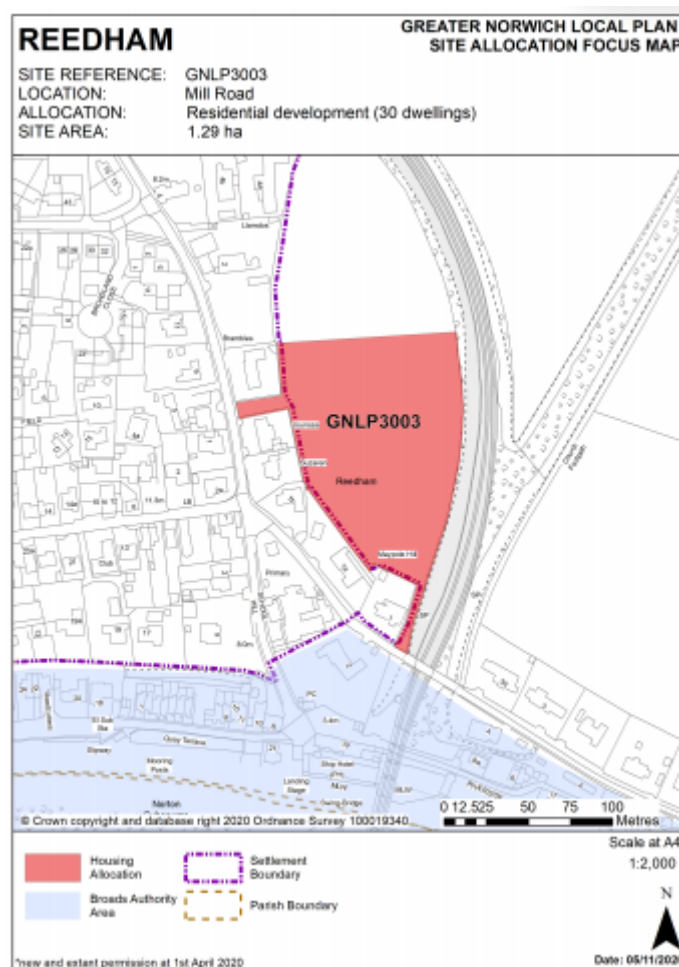
POLICY GNLP3003

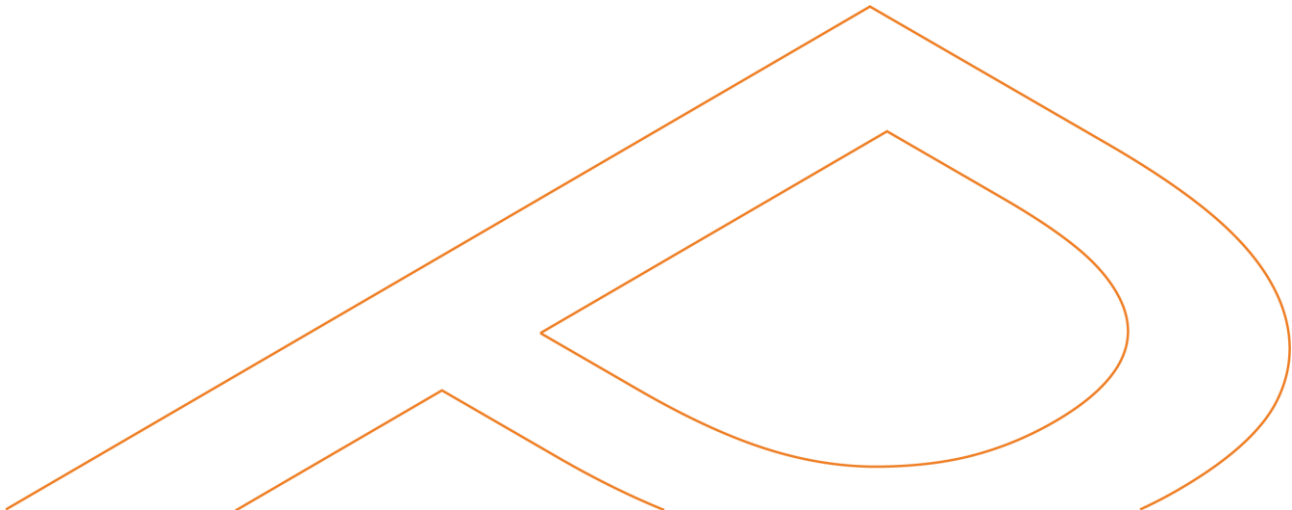
Mill Road, Reedham (approx. 1.29Ha) is allocated for residential development. The site is likely to accommodate approximately 30 homes.

More homes may be accommodated, subject to an acceptable design and layout as well as infrastructure constraints.

The development will be expected to address the following specific matters:

1. Vehicle access via Mill Road with pedestrian only access at Holly Farm Road;
2. Visibility for access is restricted and will need further investigation as this may require use of third-party land in order to be achieved;
3. Consideration of setting of non-designated heritage asset
4. Landscaping to mitigate the potential for noise pollution and vibrations resulting from proximity of the site to the railway line
5. Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is partly underlain by safeguarded minerals resources. The benefits of extracting the minerals, if feasible, will be taken into consideration.





parker planning services

Thanks for your valued business.

