

# GREATER NORWICH LOCAL PLAN REGULATION 19 (GNLP0125R) REPRESENTATIONS ON BEHALF OF ABEL HOMES

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EMAIL FROM CAROLE BAKER (PRINCIPAL PLANNING OFFICER, GREATER NORWICH LOCAL PLAN TEAM)  
DATED 12<sup>TH</sup> MARCH 21)

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RICHARD JACKSON

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## 1.0 Introduction

- 1.1 On behalf of Abel Homes, we are instructed to submit representations to the draft Greater Norwich Local Plan Regulation 19 consultation. The representation relates to the Sites Plan and specifically Policy GNL0125R, which relates to Horsham and Newton St Faith.

## 2.0 Responses to Draft Greater Norwich Local Plan – Sites Plan

- 2.1 On behalf of Abel Homes, we strongly support the allocation of GNLP0125R, land west of West Lane, Horsham St Faith for residential development. As demonstrated during the various Regulation 18 consultations (<https://gnlp.oc2.uk/document/refs/14947>) the site is entirely deliverable, and capable of making a valuable contribution towards satisfying the Councils' housing needs during the period to 2038.
- 2.2 The continued suitability of the site is detailed below. In considering the suitability of the site regard has been given to the specific requirements of Policy GNLP0125R, as well as additional technical work, and discussions with key stakeholders, notably NCC (Highways), that have taken place since the Regulation 18 (C) consultation.
- 2.3 However, whilst the principle of the policy is considered sound, in accordance with the tests set out in paragraph 35 of the NPPF, the detailed wording (specifically some of criteria attached to the policy) is not sound, as elements are neither effective or justified. Minor alterations to Policy GNLP0125R are therefore sought, to ensure its soundness. These are considered in further detail below.

### Confirmation of Delivery

#### Location

- 2.4 Horsham St Faith and Newton St Faith are designated as a Village Cluster in the draft GNLP that is appropriate for the development of approximately 50 additional homes. The cluster benefits from a Post Office and Store, pre-school, primary school, doctor's surgery, public house, alongside a range of other services and amenities, as well as employment opportunities.
- 2.5 The suitability of the site is detailed in the draft GNLP's Evidence Base (Site Assessment Booklets, Appendix A – Table of Allocated Site with reasons for allocation), which states that:
- "This site is allocated over other sites promoted in the cluster due to its accessibility to the A140, proximity to commercial development and safe walking route to St Faiths Primary school."*
- 2.6 The site provides a logical extension to Horsham St Faith, with existing residential development located to the east and commercial development to the north. In addition, land to the south is proposed to be allocated under GNLP0466R/HNF2 for employment related development.
- 2.7 The following commentary demonstrates the continued suitability of the allocation having regard to key technical matters, including the criteria identified in the draft policy.

## Density and Quantum of Development

- 2.8 As detailed above, the draft policy identifies the site as being suitable to accommodate approximately 50 homes, but recognises that more homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints being addressed.
- 2.9 Based on the identified site area of 2.31ha, the net density of development equates to 25 dwellings per hectare, which is consistent with the indicative minimum density set out in Policy 2 of the draft GNLP, which seeks a minimum net density of 25 dwellings per hectare to make efficient use of land (subject to site specific constraints).
- 2.10 Accordingly, it is evident that the site can comfortably accommodate the minimum number of homes identified by the proposed allocation, and has the potential, if required, to accommodate in excess of the 50 homes identified in the policy.
- 2.11 On this basis, it is recommended that the wording of Policy GNLP0125R is revised to state that the site will accommodate at least 50 new homes; an approach that would be consistent with other site allocations in the draft Greater Norwich Local Plan. The proposed amendment would ensure that the policy is positively prepared and justified and, therefore, sound.

## Layout and Design

- 2.12 An Indicative Masterplan has been prepared for the site by Feilden and Mawson and is attached as Appendix 1. The masterplan has been informed by technical evidence, relating to highways, access, flood risk, surface water drainage and heritage.
- 2.13 The Indicative Masterplan demonstrates how, in accordance with the requirements of the draft policy, frontage development can be successfully achieved onto Church Street, through the provision of an adoptable road parallel to Church Street and public open space to the north of the site. This means that the existing trees along Church Street can be preserved, whilst allowing views into the development from Church Street.
- 2.14 Furthermore, the development has been designed around an internal loop road system, with areas of public open space to the north and east of the site. A large area of public open space is proposed to the north east of the site, in order to mitigate any visual impact on the nearby heritage assets, thereby addressing the fourth criteria of the policy. Views into the site, from the north-eastern corner, will be of the proposed area of public open space.
- 2.15 It is also proposed to utilise the north-eastern corner as the point of pedestrian and cycle access to and from the site. This will connect into the existing pedestrian and cycle provision along Church Street, providing access into the centre of the village and to the primary school.
- 2.16 Overall, the Indicative Masterplan demonstrates how a high-quality layout and design can be comfortably achieved on the site, based on the site area and provision of 50 dwellings, whilst considering the site's constraints.

## Access, Transport and Roads

- 2.17 Criterion 1 of the policy requires the provision of frontage footways and carriageway widening. Based on the work undertaken to date it may not be possible to provide a frontage footway that meets highway standards without resulting in the loss of trees; a position recognised by NCC Highways. Accordingly, as per the suggestion from NCC Highways (see Appendix 3), it is proposed that Criterion 1 of the policy is revised to state that frontage footways will be required, unless it can be demonstrated that it is neither practical or feasible.
- 2.18 In developing an access strategy for the site (see Appendix 2), Richard Jackson have confirmed that Church Street is of an adequate width to accommodate a junction serving 50 dwellings (between 6m and 6.3m along the site frontage). Accordingly, Church Street does not require any carriageway widening to facilitate development on the site. On this basis, it is requested that the need for carriageway widening is omitted from GNLP0125R.
- 2.19 Criterion 2 of the policy requires improvements be made to the walking route to the primary school if required. Richard Jackson have completed an Assessment of the Walked Route to St Faith's Church of England Primary School (see Appendix 4). The work demonstrates that subject to minor off-site highway works, it is possible to provide a safe pedestrian route between the site and the primary school. The works would comprise a minor decrease in the radius of junctions between West Lane and Church Street and Church Street and Back Street, as well as the provision of tactile paving at various crossing points. The final detail of the off-site highway works will be agreed at the planning application stage.
- 2.20 Accordingly, it is evident that the proposed development is capable of satisfying Criterion 2 of the policy.
- 2.21 The work undertaken by Richard Jackson (see Appendix 2) demonstrates how a simple priority junction is proposed from Church Street, which provides for adequate visibility splays, and pedestrian/cycle connections. The access has been designed to serve 50 dwellings, via a Type 3 road (in accordance with the Norfolk Residential Design Guide), and is proposed to be widened to 5.5m at the site's entrance.
- 2.22 The location of the proposed access has been informed by the existing point of access to Abbey Farm Commercial Park, which is situated to the north of Church Street, in order to ensure that there is sufficient separation between the two points of access, whilst achieving the necessary visibility splays.
- 2.23 In order to allow for the site access, it is proposed to reduce the speed limit of Church Street, from 60mph to 40mph, from the A140, in addition to extending the 30mph speed limit further west. Adequate visibility splays of up to 120m to the west and 70m to the east, from a 2.4 setback can be achieved, in accordance with the Design Manual for Roads and Bridges.
- 2.24 Notwithstanding the foregoing, the draft policy requires the provision of two vehicular accesses to the site. The requirement for two points of access is not justified and is understood to be a historic comment from Norfolk County Council which related to the promotion of circa 400 units on the site. This has recently been confirmed following discussions between the GNLP Team and NCC Highways. (See Appendix 3)

- 2.25 Based on the foregoing it is, therefore evident that two points of access are not required nor justified. Accordingly, to ensure that it is justified and effective and, therefore, sound, Criterion 3 of the policy should be removed.

### **Heritage**

- 2.26 A draft Heritage Statement was prepared by David Eddleston (Conservationist Architect & Historic Built Environment Consultant) and was used to inform the preparation of the illustrative Masterplan. The document identifies the heritage assets that have the potential to be affected by development on the site i.e. The Grade I listed Church, the St Faith Priory Scheduled Ancient Monument and the conservation area, and identifies key design considerations in relation to those assets.
- 2.27 In terms of the development of the site, the north-east and south-east corners of the site are identified as being sensitive areas, as well as the eastern boundary of the site. As a result, the Indicative Masterplan does not propose development in these locations. Accordingly, whilst detailed consideration will be given to the potential heritage impact of the proposed development during the preparation and determination of a planning application, including the preparation of a Heritage Impact Assessment, the Indicative Masterplan demonstrates that, in principle, approximately 50 homes can be accommodated on the site whilst having regard to and not adversely impacting the heritage assets.
- 2.28 Accordingly, it is evident that the proposed development is capable of satisfying Criterion 4 of the policy.

### **Statement of Common Ground**

- 2.29 A draft Statement of Common Ground (SoCG) has been prepared by Abel Homes. The SoCG confirms that the site is, in principle, compliant with relevant planning considerations and deliverable. In respect of the latter, the SOCG confirms that the site is available, suitable and therefore deliverable.
- 2.30 A copy of the draft Statement of Common Ground is attached as Appendix 5.
- 2.31 Abel Homes are committed to providing contemporary, award winning homes across the region. Abel Homes have demonstrated this dedication, and their commitment to bringing new homes to the district, through a range of recently completed developments, such as the Hops in Hingham (88 dwellings), Swan's Nest, Swaffham (219 dwellings), and The Limes, Little Melton (28 dwellings). The Hops development was submitted to South Norfolk's planning department in November 2014, approved in May 2015, and has successfully been completed. The rate of delivery, therefore, for the Hops was three and a half years. A similar delivery rate would be assumed for this site. More recently Abel Homes have commenced their Taursham Park development at Taverham (93 dwellings). Demand on the site has been exceptional, with sales rates in excess of 50 units per annum, suggesting that a slightly higher delivery rate may well be achievable at Horsham St Faiths.
- 2.32 The Housing Trajectory within the SOCG outlines that the site would be delivered by 2026. This assumes the submission of an application in 2022 to tie in with the adoption of GNLP. Assuming 6-9 months for the determination of the planning application, alongside a further 6 months for construction to commence on site, housing could start to be delivered on site in 2024. It is estimated that, based on the completion rates of other schemes by Abel Homes that, assuming a cautious

approach to delivery, 25 homes would be delivered per annum, ensuring completion in 2025 / 2026 and within the first five years of the Local Plan period.

## Summary

- 2.33 As outlined above, and in previous Representations, the site is entirely suitable for residential development. Horsham and Newton St Faith, as part of the Village Clusters, is a highly sustainable location, and a preferred location for growth, and the foregoing text demonstrates that this specific site is a suitable location for development in all respects.
- 2.34 Abel Homes fully supports, in principle, the allocation of the site under Policy GNLP0125R. However, as detailed above, to ensure its soundness, a number of alterations to the Policy wording are suggested

## Revised Policy Wording

### Policy GNLP0125R

**Land to the west of West Lane, Horsham St Faith (approx. 2.31ha) is allocated for residential development. The site is likely to accommodate ~~approximately~~ **at least 50 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. Provision of frontage footways ~~and carriageway widening~~ **unless it can be demonstrated it is not practical or feasible.**
2. Implementation of any improvements required to the walking route to school, particularly at junctions en-route.
- ~~3. Provision of two vehicular point of access.~~
4. Any development must conserve and enhance the significance of the grade I listed Church of St Mary and St Andrew, the scheduled monument St Faith Priory and the conservation area, including any contribution made to that significance by setting. This includes but is not limited to a sensitive design and layout. Due to the sensitivities of this site a Heritage Impact Assessment will be required.

### Key

**Red text** – Proposed Amendments

~~Strikethrough~~ – Proposed Text to be Removed

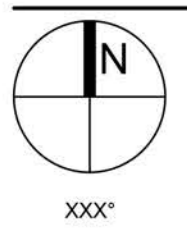


# APPENDIX 1




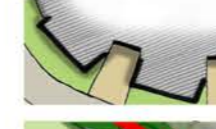




## INDICATIVE MASTERPLAN

### PREPARED BY FEILDEN + MAWSON

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REV	DATE	CHK	AMENDMENTS
A00	XX.02.2020	-	Issued for comment
A01	27.02.2020	-	Graphical Updated
A02	11.03.2020	EG	Scheme Updated

 Type 3 Road	 Public Open Space	 Foot Path
 Proposed Building Parcel	 Front Gardens	 Driveway
 Indicative Below Ground Attenuation Crates	 Forebay	

## Feilden+Mawson

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 1 Ferry Road Norwich NR1 1SU  
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CLIENT  
**Abel Homes**  
 JOB  
**Land to the East of the A140**  
**Horsham St. Faith**

DRAWING  
**Sketch development layout**

WORKSTAGE			
SCALE	PAPER	DATE	REV
1:500/1000	A1/A3	Feb 20	
JOB	DWG	REV	
<b>8881</b>			<b>A02</b>

# APPENDIX 2

## HIGHWAYS & ACCESS NOTE

### PREPARED BY RICHARD JACKSON

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Our Ref: 49455/GH/MJD

Your Ref:

11 March 2020

Mr D Piper  
Abel Homes Ltd  
Neaton Business Park  
Norwich Road  
Watton  
Norfolk  
IP25 6JB

Dear Mr Piper

## **RE: Land West of West Lane, Horsham St Faith – Highways & Access – GNLPO125**

We refer to our instructions to consider the transport aspects for a potential residential development in Horsham St Faith. The site comprises of greenfield land. Vehicular access will be taken from the road to the north of the site, hereby named throughout as Church Street, with pedestrian and cycle links to the east into the local community. Our assessment for an access and the transportation elements for the land at Horsham St Faith has been made on the potential for up to 50 dwellings.

This assessment considers current policy with regards to access for the development and accessibility, which are addressed in following matters and we present our views for proposed mitigation for the offsite infrastructure.

1. Access and off-site assessment of highways.
2. Location and accessibility to services.
3. Transportation links including pedestrian, cycle and public transport modes.
4. Development trip generation.
5. Preliminary Local Accident Analysis.

The site is located in Horsham St Faith with a grid reference of 621398, 315072 and an approximate postcode of NR10 3JU. The site is bound by Church Street to the north and opposite the Abbey Farm Commercial Park, with West Lane to the east and farmland to the west. The centre of Horsham St Faith is located to the east of the site, including additional dwellings and a cycle route which is located on West Lane, see **Figure 1** attached. To the south, the site is bound by further agricultural land, the cycle route and fields beyond.

The civil parish of Horsham St Faith resides in rural Norfolk, within the Broadland District. Officially, the civil parish is known as Horsham St Faith and Newton St Faith, connecting the two villages within the Broadland District. Horsham St Faith and Newton St Faith have approximately 797 households and a population of 1724 (taken from the 2011 Census data for the parish). The

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St Matthews Road Norwich  
Norfolk NR1 1SP

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village is situated to the east of A140 along Church Street which stretches to Newton St Faith in the north via Manor Road. Horsham St Faith is approximately 6.4km north of Norwich city centre, 22.9km east of Dereham and 27.2km south of Cromer.

### **Access and off-site assessment of highways**

A simple priority junction access is proposed from Church Street, which provides for adequate visibility splays, pedestrian and cycle connections from the site into the village centre, as demonstrated on **Drawing 49455-PP-004**.

The access parameters for the site have been considered for a development of approximately 50 dwellings. The type of access road required to serve the development is dictated by the Norfolk Residential Design Guide and is to be taken as a Type 3 road, which is to be widened to 5.5m wide at the entrance and would be taken from Church Street. The initial straight length of the road should be a minimum of 15m in length. However, there is a level difference of 2m from the road to the site. As such, the straight length of road has been extended to 25m to account for the necessary tie into the ground, using a 1 in 12.5 slope. The embankment to tie into the road design is also indicated. This is shown in **Drawing 49455-PP-004**.

To allow for the site access, the speed limit of Church Street, which is currently restricted to 60mph, is proposed to be amended. It is proposed that the 40mph speed limit is introduced from the A140 and the 30mph speed limited extended to the west. An initial design of the potential access location on to Church Street indicates that adequate visibility splays of up to 120m (for a 40mph design speed) should be available to the west and 70m to the east (for a 30mph design speed) from a 2.4m setback. This will comply with the Design Manual for Roads and Bridges, document CD 123.

There are currently no footways on Church Street within the proximity of the site. Further, it is not proposed, as part of the development, to provide a footway/cycleway along the site frontage as indicated as a requirement within the draft allocation. A site frontage footway is unlikely to be feasible at this proposed site due to drainage and topography constraints. It is therefore proposed that a new footway runs through the development, taking access from north eastern corner of the site. All proposed cycleways and footways will be designed to allow links from the site to the amenities in the village.

### **Location and Accessibility to Services**

To assess the ability for potential residents to access services, research has been undertaken to locate the local services and facilities, which are tabulated below. Distances have been measured from the proposed site access.

#### **Facility/Services Table**

<b>Facility</b>	<b>Location</b>	<b>Km</b>	<b>Miles</b>
School - Primary	Manor Road	1.1	0.7
School - Secondary	Hellesdon High School, Middletons Lane	4.4	2.7
Post Office	Back Street	0.4	0.2
Local Shop	Back Street	0.4	0.2
Doctors	Norwich Road	0.8	0.5
Public House	Norwich Road	0.8	0.5
Place of Worship	Church Street	0.3	0.2
Bus Stops	Church, Church Street	0.3	0.2
Children's Centre	St Faiths Pre-School, Church Street	0.2	0.1
Employment Zone	Abbey Farm Commercial Park	0.07	0.04
Airport	Norwich International Airport	3.4	2.1

The conclusions that can be drawn from the table are that most of the facilities and services are available in the local area. A key aim of the National Planning Policy Framework (NPPF) is to promote sustainable travel choices and accessibility to shops, jobs and other facilities whilst reducing the need to travel, especially by car.

Walking offers the greatest potential to replace the car for journeys of less than 2.0km. Cycling also has the potential to replace many car trips of less than 5.0km, which may also form part of longer journeys supported by public transport.

The following list indicates the acceptability of the site in terms of distance, frequency of use and acceptability of need to travel.

### **Acceptability of Travel/Use Table**

Facility	Location	Km	Likely Frequency of Use						
			Daily		Weekly		Greater than Weekly		
			<5.0 Km	>5.0 Km	<5.0 Km	>5.0 Km	<5.0 Km	>5.0 Km	
School - Primary	Manor Road	1.29	✓						
School - Secondary	Hellesdon High School	4.35	✓						
Post Office	Back Street	0.48						✓	
Local Shop	Back Street	0.48			✓				
Doctors	Norwich Road	0.80						✓	
Public House	Norwich Road	0.97						✓	
Place of Worship	Church Street	0.32			✓				
Bus Stops	Church Street	0.32	✓						
	Norwich Road	0.80	✓						
Children's Centre	St Faiths Pre-School	0.32	✓						
Employment Zone	Abbey Farm Commercial Park	0.32	✓						
Airport	Norwich International	3.38						✓	

The conclusions of the acceptability table for distance and frequency travelled indicates that most daily activities are within 2.0km of the development.

Whilst other activities and frequency usage of facilities are likely to be weekly or greater than weekly, the table shows that most are within 5.0km of the site and also less than 2km, indicating that there is a likelihood that walking and cycling could be used to travel to and from the majority of these locations.

Although the local nearest high school (Hellesdon High school) is inside of the walking and cycling boundaries, due to a lack of a continuous appropriate route (no footways or cycleways) from the site to the school, Norfolk County Council operate a free school bus linking Horsham St Faith to Hellesdon High School.

### **Transportation Links including Pedestrian, Cycle and Public Transport**

As stated previously local, regional and national guidance for transportation and residential dwellings advises that proposed development should be readily accessed by all sustainable modes of transport.

Considering the different modes an assessment can be made in respect of the suitability of existing infrastructure.

### ***Pedestrians***

The routes for pedestrians are currently deficient directly from the proposed site due to the lack of footway on the southern side of Church Street, limiting pedestrian movement to facilities recorded. However, all routes to the east of West Lane consist of a road with a footway on at least one side of the carriageway.

The new development will include the provision for a footway/cycleway running through the site, which will connect onto West lane in the north east corner of the site. This should encourage individuals from the new development to walk to access the local facilities.

An initial assessment of the routes to school (Primary School only), shows the pedestrian access route to the school could be deemed as a safe route, assuming West Lane can be accessed from the site. However, this is subject to further investigation with use of traffic flow data at the planning application stage.

### ***Cyclists***

The assessment of local facilities found that many of them are well within the 5.0km cycle distance parameters that are recognised in the industry.

The majority of the roads in Horsham St Faith are within a 30mph speed limit and provide an appropriate network for cycle use in the village to access local facilities. Further, the cycleways implemented as part of the Northern Distributor Road to the south of the site are also accessible from the proposed site via the road to the south of the site, onto cycleways on the eastern side of the A140. From this point, the Northern Distributor Road cycleways can be reached, or Norwich City Centre can be accessed by cycling on the road of the A140. Continuing towards the City Centre will provide links to cycleways in North Norwich at Hellesdon. Alternatively, these routes can be accessed by cycling to Spixworth, situated to the east of Horsham St Faith.

There are no national cycle routes within the vicinity of Horsham St Faith, according to the Sustrans website. Therefore, cycling outside of the village is likely to be for keen cyclists only.

### ***Public Transport***

To establish criteria for public transport provision, guidance was sought from Norfolk County Council on the necessary bus service frequency. A benchmark guide to bus services can be found in the Norfolk Bus Strategy 2003/4 to 2008/9. Whilst this document is a few years old and has not been updated but does give criteria for 'Target level of service in rural areas (all offering a return journey)'.

For a parish population of between 1500 and 3000 the target service level should provide the following:

- Shopping service, five days a week;
- journey to work service;
- a Saturday service and;
- an evening service;

The closest bus stop is located along Church Street, approximately 300m from the proposed access. A breakdown of the services operated from this stop is shown in the table below.

Operator	Service	Frequency
Sanders Coaches	<b>43</b> Norwich – Hellesdon – Newton St Faith – Aylsham – Reepham	<b>Mon - Fri:</b> 0937, 1101, 1301, 1411, 1551, 1744 <b>Sat:</b> 1130, 1415, 1530, 1744
	<b>43</b> Reepham – Aylsham – Newton St Faith – Hellesdon – Norwich	<b>Mon - Fri:</b> 1000, 1115, 1315, 1515, 1624, 1659 <b>Sat:</b> 0815, 1015, 1215, 1315, 1615
Sanders Coaches	<b>44A</b> Norwich - Aylsham – Cromer - Sheringham	<b>Mon - Fri:</b> 0747, 1644, 1847, 1940, 2303 <b>Sat:</b> 0746, 0928, 1842, 1938, 2301
	<b>44A</b> Sheringham – Cromer – Aylsham – Norwich	<b>Mon - Fri:</b> 0727, 1605, 1839, 2209 <b>Sat:</b> 0656, 0736, 1638, 1839, 2209

Note: All times are correct as of 12 February 2020

The bus company Sanders Coaches use bus stops on Church Street and Norwich Road for all services listed above. The stops include the Church and the Black Swan. Services are frequent and offer good commuting and social facilities. The accessibility of the buses may also encourage more individuals to use public transport, rather than using their cars. The proposed footway/cycleway connection from the development onto West Lane should provide ease of access to the existing bus stop.

Overall, the bus timetables meet the Norfolk County Council village requirements for Horsham St Faith in terms of public transport availability and frequency.

### Development trip generation

If it is assumed the key areas of employment are Dereham, Wymondham and Norwich, 75% of the development traffic would travel towards the west and south via the A140. Therefore, it is assumed that 75% of the traffic would travel away from the village centre.

The TRICS database has been used to estimate the likely trip generation of the development proposal. The selection was made for houses privately owned for sites in England excluding Greater London. The trip rates for vehicular trips, including forecast vehicular trip generation, are shown in the table below.

Vehicular Trip Rates & Trips	AM Peak		PM Peak		12 Hour	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Private Dwellings Trip Rate (1 Dwelling)	0.124	0.387	0.355	0.170	2.311	2.332
<b>Total Trips (50 Dwellings)</b>	<b>6</b>	<b>19</b>	<b>18</b>	<b>9</b>	<b>116</b>	<b>117</b>

### Preliminary Local Accident Analysis

Five-year highway injury accident records have been reviewed from [www.crashmap.co.uk](http://www.crashmap.co.uk), for the period 2014-2018. Church Street in the vicinity of the site has been assessed. One 'slight' accident occurred in close proximity to the proposed site access, in February 2015. Two other 'slight' accidents occurred at the junction with the A140. None of the identified accidents involved pedestrians or cyclists. The available highway injury accident data indicates that there are no recurring accident locations in the vicinity of the site that would be disproportionately affected by the proposals.

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## Conclusions

To collate the issues and highlight the matters that are relevant to transportation for the proposed development at Church Street, Horsham St Faith, the following table shows the summary of benefits that this scheme includes:

### Summary Table

Matters	Comment	Satisfactory	Needs some Upgrade	Not Satisfactory
Site Access	A satisfactory access with necessary visibility can be achieved subject to speed limit reduction.			
Accessibility to Services	A high proportion of daily and weekly services can be accessed by pedestrian, cyclists or public transport routes at less than 2.0km with proposed footways / cycleways.			
Pedestrian Links	Good site routes to schools and facilities (upon an additional footway being implemented within the development)			
Cycle Facilities	There is no specific route in the village however there is a 30mph speed limit proposed between the site and local facilities, including cycleways to connect to existing infrastructure.			
Public Transport	The current public transport provision does meet the NCC targets.			

It is therefore concluded that in terms of vehicular access, accessibility to services, other modes of transport, the site meets all the necessary criteria.

In summary, the development will create a higher level of vehicle trips on the local highway network, however this is compensated for by the proximity of the Northern Distributor Road in the peak hour. Providing sufficient pedestrian facilities to the local area will mitigate the generated traffic further.

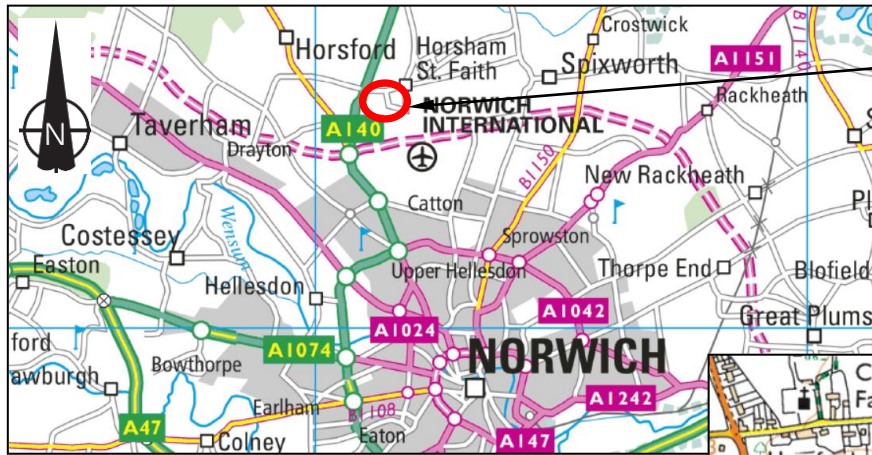
I trust the foregoing is satisfactory, but if we can be of further assistance, please do not hesitate to contact us.

Yours sincerely,

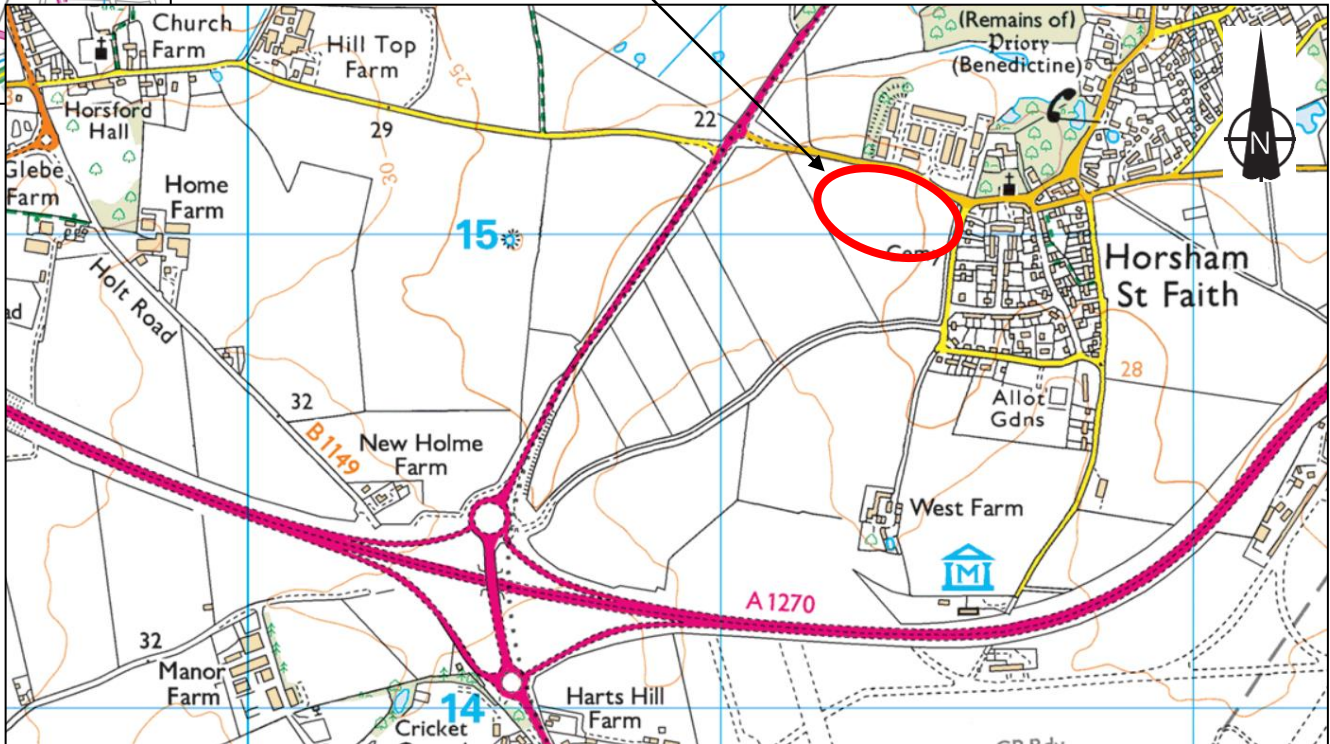
Prepared by George Hood  
on behalf of Richard Jackson Ltd

Checked by Martin Doughty (Director) – BEng (Hons), CEng, FICE, FCIHT, MAPM  
on behalf of Richard Jackson Limited

Encs – Figure 1  
Drawing 49455-PP-004




**THE SITE**

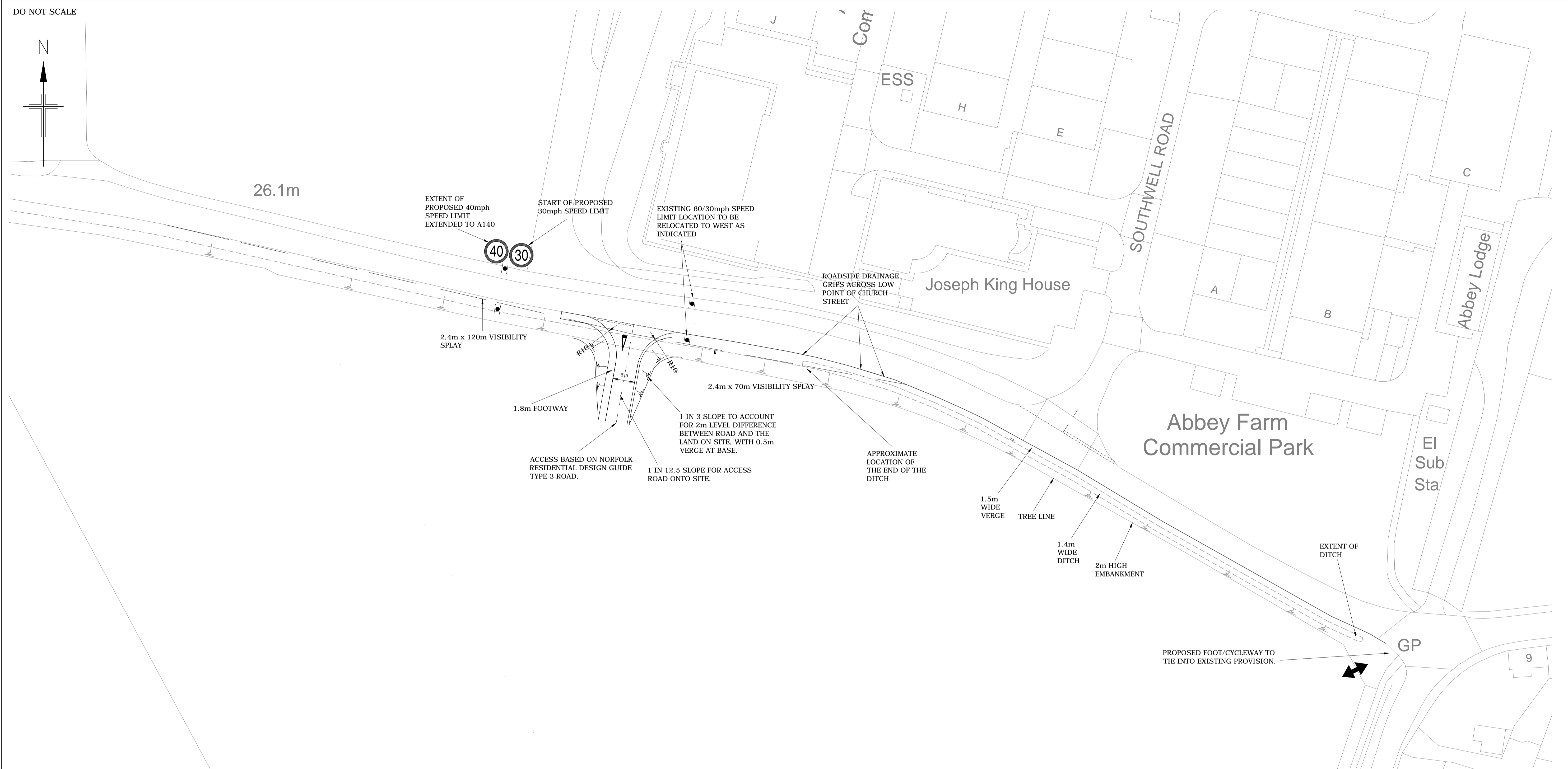
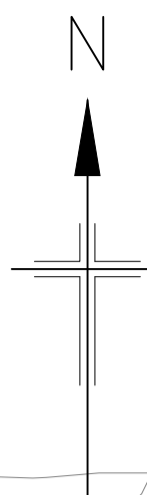


REPRODUCED FROM ORDNANCE SURVEY MAP WITH THE PERMISSION OF THE CONTROLLER OF HER MAJESTY'S STATIONARY OFFICE. © CROWN COPYRIGHT RICHARD JACKSON LTD - ACC No. 100002572

Site location grid reference 621398, 315072 and postcode NR10 3JU

Client: <b>Abel Homes Ltd</b>		Drawing Title: <b>Site Location Plan</b>		 4 The Old Church, St Matthews Road, Norwich, NR1 1SP Tel. 01603 230240 www.richardjackson.uk.com
Job Title: <b>Land in Horsham St Faith</b>	Date: <b>12/02/2020</b>	Job No: <b>49455</b>	Dwg No: <b>Fig. 1 (NTS)</b>	

DO NOT SCALE



NOTES:

1. ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.
2. LEVELS ARE IN METRES ABOVE ORDNANCE SURVEY DATUM.
3. SELECTED ROAD MARKINGS SHOWN INDICATIVELY.
4. DESIGN BASED ON ORDNANCE SURVEY MAPPING AND SUBJECT TO DETAILED DESIGN AND SUBJECT TO ROAD SAFETY AUDIT.
5. LOCATIONS OF EMBANKMENT, DITCH, VERGE AND TREE LINE OBTAINED FROM SURVEY ON 05/02/2020.

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REV	DATE	DESCRIPTION	DRAWN	CHKD
REVISIONS				

Project <b>LAND AT HORSHAM ST FAITH</b>	Title <b>PROPOSED SITE ACCESS</b>	Client <b>ABEL HOMES LTD</b>	Drawn GH	Date 12/02/2020	This drawing is to be read in conjunction with all other Engineer's drawings and all other project information. Any discrepancy between the Engineer's drawings and other project information is to be reported to the Engineer immediately.	<p><b>Richard Jackson</b> Engineering Consultants</p> <p>847 The Cornhill, Colchester, Essex, CO1 1PQ Unit 6040, 6th Floor, Algate Tower, 2 Leaman Street, London E1 8FA 3 Queens House, Mill Court, Great Shelford, Cambs CB22 3LD 4 The Old Church, St. Matthews Road, Norwich, Norfolk NR1 1SP The Woodhouse, Road Mill, Sparsholt, Gloucestershire GL10 3BP Email Address: mail@rj.co.uk</p> <p>Tel: 01206 228000 Tel: 020 7448 9910 Tel: 01223 314794 Tel: 01603 230040 Tel: 01172 500070 Website: http://www.rj.co.uk</p>	Drawing No. <b>49455/PP/004</b>	Revision	
Job Manager MD			Checked LG	Approved MD			Scale 1:500@A1	Drawing Status	
Approved MD			Checked LG	Approved MD			Scale 1:500@A1	<input checked="" type="checkbox"/> INFORMATION <input type="checkbox"/> APPROVAL <input type="checkbox"/> COSTING <input type="checkbox"/> TENDER <input type="checkbox"/> CONSTRUCTION <input type="checkbox"/> AS CONSTRUCTED	

## APPENDIX 3

# EMAIL FROM CAROLE BAKER (PRINCIPAL PLANNING OFFICER, GREATER NORWICH LOCAL PLAN TEAM) DATED 12<sup>TH</sup> MARCH 21)

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## Karen Long

---

**From:** Baker, Carole <carole.baker@norfolk.gov.uk>  
**Sent:** 11 March 2021 11:25  
**To:** Iain Hill  
**Cc:** Banham, Adam; Paul Legrice  
**Subject:** Highway comments regarding site GNLP0125R in Horsham St Faith

Dear Iain

I have now heard back from David Wilson in highways regarding site GNLP0125R in Horsham St Faith.

With regard to the policy requirement for two vehicular accesses they have confirmed that this was an error. Highways would be happy with a single vehicular access located at Church Street subject to the provision of visibility splays to an appropriate standard. They comment that at this stage there seems to be a desire to protect frontage trees, so they assume that the development will be tucked away and there will be no sense of place at Church Street. On that basis they would suggest wording in the policy to say 'Visibility splays should be provided in accordance with the requirements of the Design Manual for Roads and Bridges (DMRB)'.

I also mentioned to David our conversation about your desire to have more flexibility in the policy wording regarding the provision of footways. Highway preference is for the provision of a 3.m cycleway at the Church Street frontage to the site. This in addition to providing a safe and sustainable connection between the site, local facilities including employment and an existing established cycle network, would also alter the highway environment and exert downward pressure on vehicle speeds. Highways have said that whilst they note the presence of trees adjacent to the carriageway they do not feel that these necessarily preclude the construction of a cycleway and would wish the option to be robustly explored before it is discounted. They suggest a policy requirements something along the lines of 'Connections must be provided between the site and existing pedestrian and cycle networks at Church Street and West Lane, this should be in the form of a 3.0m wide footway/cycleway at the Church Street frontage unless it is demonstrated that an acceptable layout cannot be achieved'.

We are keeping a log of issues arising at the Regulation 19 stage so I will add these issues to that log and I would imagine that they can be dealt with through the examination as modifications to the plan. I don't think we would have any objection to making changes to the policy for site GNLP0125R to reflect the recommendations from highways contained in this email.

Obviously it will be up to you how you use this information in making your formal representations to the plan.

Kind regards  
Carole

**Carole Baker**  
**Principal Planning Policy Officer**  
**Greater Norwich Local Plan Team**

T: (01603) 223471  
E: [carole.baker@norfolk.gov.uk](mailto:carole.baker@norfolk.gov.uk)  
W: [www.greaternorwichlocalplan.org.uk](http://www.greaternorwichlocalplan.org.uk)

**General Enquiries: 01603 306603** [GNLP@norfolk.gov.uk](mailto:GNLP@norfolk.gov.uk)

**The Greater Norwich Local Plan**  
Growing Stronger Communities Together  
gnlp@norfolk.gov.uk

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To see our email disclaimer click here <http://www.norfolk.gov.uk/emaildisclaimer>

## APPENDIX 4

# ASSESSMENT OF THE WALKED ROUTE TO ST FAITH'S CHURCH OF ENGLAND PRIMARY PREPARED BY RICHARD JACKSON

---

Our Ref: 49455/MJD  
Your Ref:

9 March 2021

Mr D Piper  
Abel Homes Ltd  
Neaton Business Park  
Norwich Road  
Watton  
Norfolk  
IP25 6JB

Email Only

Dear Mr Piper

**Re: Land East of A140, Horsham St Faith**

Further to your recent instruction we have completed the Assessment of the Walked Route to St Faiths' C of E Primary School. In undertaking the assessment we have considered the guidance set out in "Assessment of Walked Routes to School", Road Safety GB et al, 2012 (updated 2016).

For the purpose of the assessment it is assumed that the development would provide a safe route between individual dwellings and the sites pedestrian access to Church Street/West Lane. It is therefore from this access point that the attached assessment has been undertaken. It is further assumed that children will be accompanied (an adult for example) as may be appropriate and as allowed for by the guidance.

A review of highway injury accident records for the route viewed via [www.crashmap.co.uk](http://www.crashmap.co.uk) for the three year period 2017-2019 shows that a single 'slight' severity accident occurred along the route. The accident rate is therefore not considered to be significant for this assessment.

The route described fully on the attached, consists of Church Street, Norwich Road and Manor Road over a distance of approximate 1.0km/0.6miles (from the site boundary). Footways are present throughout with crossings required of West Lane, Church Street, Cross Keys and Doctors Meadows. Of these Cross Keys and Doctors Meadows are minor cul-de-sacs and are not considered to be significant.

The crossing location on West Lane is close to the junction with Church Street where the large existing radius of the left turn in to the West Lane would result in excessive crossing distance. It is therefore proposed to decrease the radius to 15m as illustrated on **Drawing 49455/PP/007** attached. Tactile paving should also be provided at the crossing point.

The location of a suitable crossing point on Church Street is influenced by the use of the northern footway for parking (likely in connection with the church). The crossing position would therefore be best suited at the eastern end of the church just west of Back Lane. To provide an appropriate crossing, it is proposed to reduce left turn radius from Back Lane to Church Street to 15m and to provide

Cont'd.../

4 The Old Church  
St Matthews Road Norwich  
Norfolk NR1 1SP

Telephone: 01603 230240  
[www.rj.uk.com](http://www.rj.uk.com)





tactile paving at the Church Street crossing point, the location of which is included on **Drawing 49455/PP/007** attached.

It should be noted that no recent traffic flow data is available for West Lane or Church Street, nor has it been possible to collect any new data due to the ongoing travel restrictions related to COVID-19. Whilst we are not aware of any historic data for West Lane, there is some publically available data to provide an initial indication of flow levels on Church Street.

Public domain traffic data sources suggest that flows on Church Street might be considered as low to medium but above the level where it can automatically be assumed that the road is safe to cross with respect to the guidance. In our view, however, once a traffic count and gap assessment has been conducted, it is likely that the proposed crossing provision for Church Street will be appropriate to the location and route.

For West Lane, it is considered unlikely that traffic flows would be prohibitive to the provision of a safe route to school subject to the aforementioned mitigation.

In summary, our assessment has concluded that subject to mitigation, a safe route to the nearest primary school to the site can be provided.

I trust that the above and attached provide you with the information you need to progress your assessment of the site, however do please let us know if you have any queries or if we can be of any further assistance.

Yours sincerely



Martin Doughty  
Director on behalf of Richard Jackson Ltd

Encs

Assessment of Walked Route to School  
Drawing 49455/PP/007 – Route to St Faiths' C of E Primary School

# ASSESSMENT OF WALKED ROUTE TO SCHOOL

## ROUTE INSPECTION FORM

prepared with reference to the Assessment of Walked Routes to School (Road Safety GB, 2016)

**ROUTE LOCATION:** Horsham St Faith, Norfolk

**FROM: (Address)** Proposed pedestrian/cycle access at Church Street/West Lane junction

**TO: (School Name)** St Faith's C of E Primary School,  
Manor Road, Horsham St Faith, NR10 3LF

**VIA: (Roads)** Norwich Road



4 The Old Church  
St Matthews Road  
Norwich  
NR1 1SP

Tel: 01603 230240

## FINDINGS

**ROUTE:**  **SAFE (subject to improvements, shown attached)**  
 **UNSAFE**

**DATE REVIEWED:** **March 2021**

**NAME:** **Duncan Palmer**

**DISTANCE OF ROUTE:** **Approx 0.6 mi / 1.0km (site access to school)**  
**(miles & kilometres)**

---

### IF UNSAFE – CRITERIA AREAS

#### FOOTWAY

---

#### STEP-OFFS

---

#### ROAD WIDTH

---

#### VISIBILITY

---

#### WEIGHT OF TRAFFIC

---

#### SPECIFIC UNSAFE POINTS

---

### SUPPLEMENTARY COMMENTS

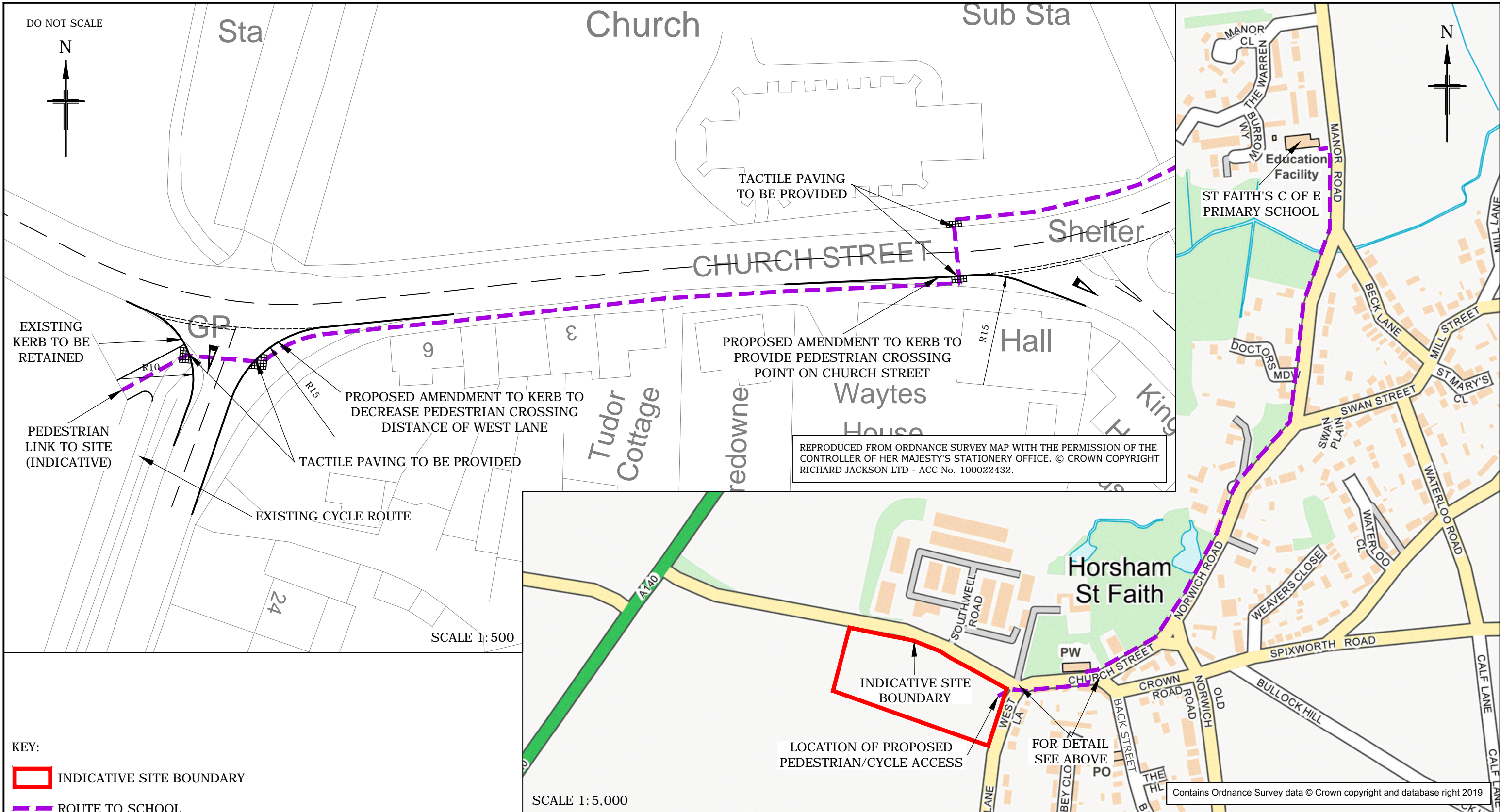
From the proposed site access to Church Street/West Lane, cross West Lane to the western side. Proceed northeast along the western side of West Lane and onto the southern side of Church Street. Cross Church Street to the northern side near to the eastern end of The Church of St. Mary and St Andrew (before reaching Back Street). Continue northeast along the northern side of Church Street on to the western side of Norwich Road. Cross the minor road of Cross Keys Close (a cul-de-sac) then continue on the western side Norwich Road and Manor Road. The footway continues across the minor road of Doctors Meadow (also a cul-de-sac) on to the schools pedestrian access point.

The route including improvements to be provided by the development is shown on Drawing 49455/PP/007 attached.

Prepared: Duncan Palmer

Reviewed: Martin Doughty

Date: March 2021



KEY:  
 INDICATIVE SITE BOUNDARY  
 ROUTE TO SCHOOL

Project Title <b>LAND EAST OF A140 HORSHAM ST FAITH</b>	
Drawing Title <b>ROUTE TO ST FAITHS' C OF E PRIMARY SCHOOL</b>	

Client Title <b>ABEL HOMES LTD</b>			
Scale AS SHOWN @A3	Drawn D. PALMER	Date 08/03/21	
Job Manager M. DOUGHTY	Checked M. DOUGHTY	Approved M. DOUGHTY	

This drawing is to be read in conjunction with all other Engineers' drawings and all other project information. Any discrepancy between the Engineer's drawings and other project information is to be reported to the Engineer immediately.

**Richard Jackson**  
Engineering Consultants

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 Unit 06C130, 6th Floor, 1 St. Katherine's Way, London, E1W 1UN  
 5 Quern House, Mill Court, Great Shelford, Cambs CB22 5LD  
 4 The Old Church, St. Matthews Road, Norwich, Norfolk NR1 1SP  
 The Wheelhouse, Bonds Mill, Stonehouse, Gloucestershire GL10 3RF

Tel: 01206 228800  
 Tel: 020 7448 9910  
 Tel: 01223 314794  
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 Tel: 01172 020070

Email Address: mail@rj.uk.com Website: http://www.rj.uk.com

REV	DATE	DESCRIPTION	DRAWN	CHKD
Drawing No. <b>49455/PP/007</b>		Revision		
Drawing Status				
<input checked="" type="checkbox"/>	INFORMATION	<input type="checkbox"/>	APPROVAL	<input type="checkbox"/>
<input type="checkbox"/>	TENDER	<input type="checkbox"/>	CONSTRUCTION	<input type="checkbox"/>
<input type="checkbox"/>	COSTING	<input type="checkbox"/>	AS CONSTRUCTED	

# APPENDIX 5

# DRAFT STATEMENT OF COMMON GROUND

---

Greater Norwich Local Plan (GNLP) Site Allocation Statement of  
Common Ground (SoCG)

Between

Broadland District Council, South Norfolk Council,  
Norwich City Council, Norfolk County Council

And

Site Reference:

Site Address:

Proposed Development:

## Introduction

The Greater Norwich authorities want to ensure sites allocated in the GNLP are achievable, where possible wholly compliant with all relevant planning considerations, and deliverable in a timely way. It is with that purpose in mind that landowners, agents and developers with a site likely to be included in the GNLP are being asked to agree a Site Allocation Statement of Common Ground (SoCG). Each SoCG will be available to the inspector appointed to examine the GNLP so that they can satisfy themselves of the commitment to deliver each site and to meeting local plan requirements.

The GNLP Team wants the process of agreeing a SoCG to be a frank but collaborative process for all parties concerned. In the case of most sites, this process is likely to commence in Autumn 2020 and conclude in 2021 as the Regulation 19 submission draft of the GNLP is finalised. For other sites, for example where development may entail abnormal costs, discussions may continue in to 2022, as the GNLP reaches its examination in public.

This SoCG template has been designed with consideration to the possibility of future planning reforms. It is deliberately straightforward and only asks the questions that any landowner, agent, or developer would naturally ask themselves. The template only requires 700 words of written response to complete, but its importance should not be underestimated.

The GNLP Team regards the viability and timely delivery of development as a high priority. Therefore, the working assumption is without a SoCG a site is unlikely to be allocated.

## General Guidance

When completing the SoCG template please be precise. For example, in the description of development proposed, use the appropriate GNLP four-digit reference code, as well as giving a site address (including a postcode or eastings/northings reference).

Signatories to the SoCG should include all relevant parties with a role in bringing forward the proposed development. This should include all landowners, agents, developers, and possibly end-users of the development (if known).

## Greater Norwich Local Plan (GNLP)

The SoCG template contains a series of free-text questions that are designed to be answered within 100 words. If for whatever reason answering one or more of these questions is not possible or proves difficult site promoters are welcome to seek guidance from the GNLP Team. This may lead to completing the SoCG with a description of what issues remain for resolution at a future date.

Completing this SoCG template should be done with reference to the draft policies associated to the GNLP. Notable examples that will likely affect the form of development on site and its construction costs include:

- Provision of green infrastructure and suitable alternative green space (known as SANGS) under Policy 2 Sustainable Development and Policy 3 Environmental Protection and Enhancement; and,
- Obligations for affordable housing under Policy 5 Homes.

It should also be noted that completing a SoCG is a separate exercise from other data requests made by the Greater Norwich Local Plan Team, or the Greater Norwich authorities. For example, this is a separate exercise to the Five-year Housing Land Supply statements that are requested for the Annual Monitoring Report.

### **Commercially Sensitive or Other Confidential Information**

By submitting a SoCG you are consenting to the details about you and your site/s being published and available for public viewing. Any information that you consider to be confidential or commercially sensitive and would not want published should be excluded from this form.

By signing you are agreeing to the information provided being to the best available knowledge accurate, and that it can be used in preparation of the Greater Norwich Local Plan (GNLP) – and used in evidence at the public examination of the GNLP.



1. Please provide a commentary on the site's progress in respect to the three tests of being available, suitable, and deliverable.

*[Approximately 100 words recommended]*

2. Please provide a commentary on any land ownership constraints that may affect or delay development of the site.

*[Approximately 100 words recommended]*

3. Please provide a commentary on progress to making a planning application – such as pre-application advice, or if planning permission exists on all or part of the site.

*[Approximately 100 words recommended]*

4. Please provide a commentary on the site's delivery, for example a predicted start-on-site, the annual rate of delivery, and the development's likely completion date.

*[Approximately 100 words recommended]*

5. Please provide a commentary on engagement held with statutory bodies and if any agreements have been made.

*[Approximately 100 words recommended]*

6. Please provide a commentary on any known technical constraints about the site – such as but not limited to highways, heritage, or ecology.

*[Approximately 100 words recommended]*

7. Please provide a commentary on community benefits the site will offer – such as but not limited to land and/or buildings for education and community provision.

*[Approximately 100 words recommended]*

# Greater Norwich Local Plan (GNLP)

Signed on Behalf of the Greater Norwich Development Partnership	Date
-----------------------------------------------------------------	------

Signed on behalf of	Date
---------------------	------



**NORWICH**  
City Council



Working with



**Norfolk** County Council



BIDWELLS