



Brettingham House, 98 Pottergate, Norwich NR2 1EQ
T 01603 631 319 F 01603 628 464 E info@lanproservices.co.uk

Our ref: 1686

22 March 2021

Greater Norwich Growth Board

Submitted electronically

Dear Sirs

Greater Norwich Local Plan Regulation 19, Draft Strategy and Site Allocations, Broadland Village Clusters – Land east of Salhouse Road, Little Plumstead

Introduction

These representations are submitted on behalf of Glavenhill Limited to the Greater Norwich Local Plan (GNLP) Regulation 19 Draft Strategy and Site Allocations Process.

These representations relate to Land east of Salhouse Road, Little Plumstead (GNLP 0483R). The land is being promoted for residential allocation by Glavenhill on behalf of the landowner.

These Representations

Consistent with concerns expressed within earlier consultation stages, these representations document Glavenhill's continued objection to Broadland District Council's ('the Council') strategy for the village cluster of Great and Little Plumstead. It is considered to be neither 'positively prepared', 'justified' or 'effective' in delivering the houses needed within the village over the plan period and is therefore 'unsound' when considered against paragraph 35 of the National Planning Policy Framework (NPPF).

The decision not to allocate the proposed allocation site (GNLP0483R) (see **Appendix 1**) is also considered unjustified and therefore 'unsound' for reasons set out below. Glavenhill contend that the site is a suitable, available and deliverable option for small scale SME housing that occupies no highway objection and can protect and provide a defensible boundary to, the open countryside to the west.

Background

The site was originally promoted to the GNLP Regulation 18 process as part of the Stage A Site Proposals and Growth Options consultation in March 2018 (site reference GNLP0483) for residential development together with new areas of green infrastructure.

At the time of the Regulation 18, Stage A representations, Glavenhill had submitted and was awaiting the determination of, an outline application for the development of the site for 84 dwellings including 5% self-build and 33% affordable units.

The application was later refused and dismissed at Appeal due to the development's encroachment into the countryside, and questions over its sustainability and the deliverability of the proposed highway improvements.

Glavenhill wrote to the Greater Norwich Growth Board (GNGB) in June 2019 confirming that despite the 'unusual' and disappointing appeal decision, they remained committed to the site and had

explored an alternative scheme that addressed each of the Inspector's reasons for refusal and delivered additional benefits.

An illustrative masterplan was submitted with the representations showing how the site could be delivered. Broadland District Council determined not to allocate the revised site within the Regulation 18, Stage C GNLP.

Glavenhill subsequently responded to the Regulation 18 Stage C consultation, addressing each of the Council's reasons for deeming the site 'unsuitable' for allocation. In doing so, Glavenhill promoted a reduced site area for a smaller number of dwellings (20 - 25) together with appropriate landscape buffers.

Despite demonstrating the suitability of this second alternative proposal, the Council have once again considered it (under revised site reference: GNLP0483R) 'unreasonable' for allocation within the Regulation 19 draft GNLP.

The Development Strategy for Great and Little Plumstead

The villages of Great and Little Plumstead are 'grouped together' and categorised as a 'Village Cluster' within the Regulation 19 draft GNLP.

These latest representations are therefore made in response to draft Policy 7.4 of the Regulation 19 Consultation Document which deals with the GNGB's strategy for Village Clusters and Part 2 of the Plan as it relates to housing allocations in Great and Little Plumstead.

Draft Policy 7.4 confirms that 4,220 homes, or around 9% of the total housing growth for the Greater Norwich Area, to be brought forward within the plan period, will be located within village clusters. 482 of these homes will be allocated within Broadland.

Draft Policy 7.4 aims to promote social sustainability by supporting rural life and services through facilitating small scale residential development in village clusters such as Little and Great Plumstead. The provision of several relatively small allocation sites is suggested to have the additional benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations. Glavenhill support this objective.

Broadland confirm their strategy for the village cluster of Great and Little Plumstead within the Sites section of the GNLP Regulation 19 draft as follows:

"Whilst it is considered the cluster could accommodate development of 50-60 additional homes, there are no allocations proposed and no allocations to be carried forward in this cluster. There are however 171 dwellings with planning permission on a number of sites. No new allocations are proposed but further development is not ruled out. The Village Clusters policy 7.4 and Small Scale Windfall Housing Development policy 7.5 both allow for an amount of growth in each village cluster that reflects primary school capacity.."

Glavenhill object to Broadland's strategy for the village cluster of Great and Little Plumstead, considering it to be neither 'positively prepared', 'justified' or 'effective' in delivering the houses needed within the village over the plan period nor the objectives of Policy 7.4 and is therefore 'unsound' when considered against paragraph 35 of the National Planning Policy Framework (NPPF).

The cluster has been deemed an appropriate location for in the order of 50 to 60 new homes by the Council based upon its local service provision, not least the capacity of the local primary school. Despite the settlement's capacity for growth, Broadland has deemed it unnecessary to carry forward any previous allocations or set any new ones, relying instead on the windfall strategy set out in draft Policies 7.4 and 7.5 of the Regulation 19 GNLP.

Whilst national planning policy guidance confirms that windfall sites can, if supported through policies, facilitate the delivery of small and medium housing sites and therefore assist in meeting the housing requirement of an area, paragraph 70 of the NPPF is clear that any windfall strategy should be based upon *"compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."*

There is no such evidence provided in this instance.

Glavenhill suggest that a more effective and deliverable strategy would be to allocate a series of small sites (each providing in the order of 12-25 homes) to the village cluster, within the new GNLP that have been confirmed as being deliverable by landowners and promoters in the short term.

The site to the east of Salhouse Road, Little Plumstead is one such site.

The Proposed Allocation Site

The Council document their assessment of the revised site area in the Great and Little Plumstead Site Assessment Booklet that accompanies the GNLP Regulation 19 draft.

At pages 36 to 37 of that document the Council state:

"A revision to the site was submitted through the Reg 18C consultation. Further discussion has taken place regarding this site and although the Highway Authority are of the view that a maximum of 25 dwellings could potentially be provided subject to carriageway widening and footway provision, Development Management colleagues point to the history of refusals in the area, both on this site and adjacent GNLP3007R. They consider that existing development around the Brick Kilns crossroads is of a separate character to the development to the south on Salhouse Road and separation should be maintained. For these reasons the site continues to be considered unreasonable for allocation."

The Council go on to confirm at Appendix B of the GNLP Regulation 19 Evidence Base that:

"The larger site was not considered to be suitable for allocation due to level of highway improvements which would be needed as the 'Brick Kilns' junction. A smaller scale of development may still require some level of highway improvements. There has been a history of planning refusals in the area and it is considered that there are no benefits to be gained from a smaller development. Development around the crossroads could be considered to be of a separate character to the existing development to the south on Salhouse Road so separation should be maintained."

In response, it is Glavenhill's view that:

- The conclusion that development can not be located in this location because the character of the development to the north differs to that to the south, is entirely unjustified. The

Council fail to describe the character of each area, how they differ and why that would preclude a positively designed residential scheme in this location.

- In the absence of any information to the contrary, Glavenhill conclude that character of the two areas is in fact very similar, with both comprising 1960s /1970s bungalows and dormer bungalows fronting onto the main roads into and out of the village.
- Whilst the 'form' and scale of development within the two areas differs i.e the northern element is more linear and contains a much lesser number of dwellings, this does not justify preventing future development from taking place between them.
- It is entirely possible through the application of appropriate design and the fixing of landscape buffers, to control the form of development, to ensure the site's appropriate integration and a much more coherent relationship between the two areas. It was demonstrated during the planning appeal for 84 dwellings at the site, that a far larger development can be successfully integrated into the fabric of the village with a limited effect on the surrounding landscape. This matter was corroborated by the Inspector who, despite confirming that the development would encroach into the countryside, concluded that the site is "*far from significant in landscape terms*". He went on to confirm, contrary to the Council's latest comments, that the "*indicative layout and the scale of the proposed development would seek to reflect the village like density of development to the south*". No comment or objection was raised to its character differing from the development to its north.
- In this and all other respects, the Council's discounting of the site on matters of development character, is entirely unjustified and therefore 'unsound'.

Despite providing no objection to the proposed allocation on any other matter than local development character, the Council continue to score the site unreasonably against the HELAA assessment categories. It is noted specifically that whilst the Highway Authority has not expressed any specific concerns on the impact of a smaller development on matters of transport, the site continues to be scored 'Amber' against this category. With no reasoning being provided, the Council's assessment of the proposed allocation site against the HELAA criteria is 'unjustified' and 'unsound'. A fully evidenced and robust assessment is provided by Glavenhill at **Appendix 2** of these representations.

Summary of Development Offer and Representations

The proposed allocation site provides a suitable, available and deliverable opportunity for Broadland District Council to supplement housing supply within its rural area in line with the GNGB's village cluster strategy.

The site would, if allocated, assist the Council in meeting an identified need for new housing in the Great and Little Plumstead village cluster which fails to be met through draft Policies 7.4 and 7.5 of the Regulation 19 Consultation Document.

Lanpro has demonstrated the site's suitability for residential development against the GNGB's HELAA categories drawing reference to a number of technical assessments that were prepared in support of the previous planning application and appeal at the site. The recent appeal decision did not question the site's environmental suitability but drew issue only with the scale of the proposed



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development and its impact upon the surrounding highway network, matters which have been overcome through the enclosed revised allocation proposal.

Contrary to the GNGB's conclusion, the allocation of part of the site (circa 1ha) for between 20 to 25 dwellings (in the manner shown on at **Appendix 1**) would:

- Make a meaningful contribution to bolstering local housing supply in the rural area of Broadland and within a village cluster that has been identified as requiring additional growth.
- Provide a mix of house types and tenures, including a policy compliant amount of affordable homes to assist in addressing local, rural housing needs.
- Deliver a logical and defensible limit to the existing settlement.
- Support local services and the vitality of the rural area.
- Result in only a modest amount of traffic that can be easily accommodated by existing infrastructure.
- Be of an appropriate scale to be attractive to small to medium sized housebuilders who find it difficult to compete for and deliver larger strategic sites and will provide additional choice to the local housing market.

The site has received good interest from local house builders, who offer their support to these representations.

As such and by way of conclusion, Glavenhill contend that the allocation of the site in response to an identified local housing need is entirely justified and would be considered positively prepared and therefore a 'sound' planning approach.

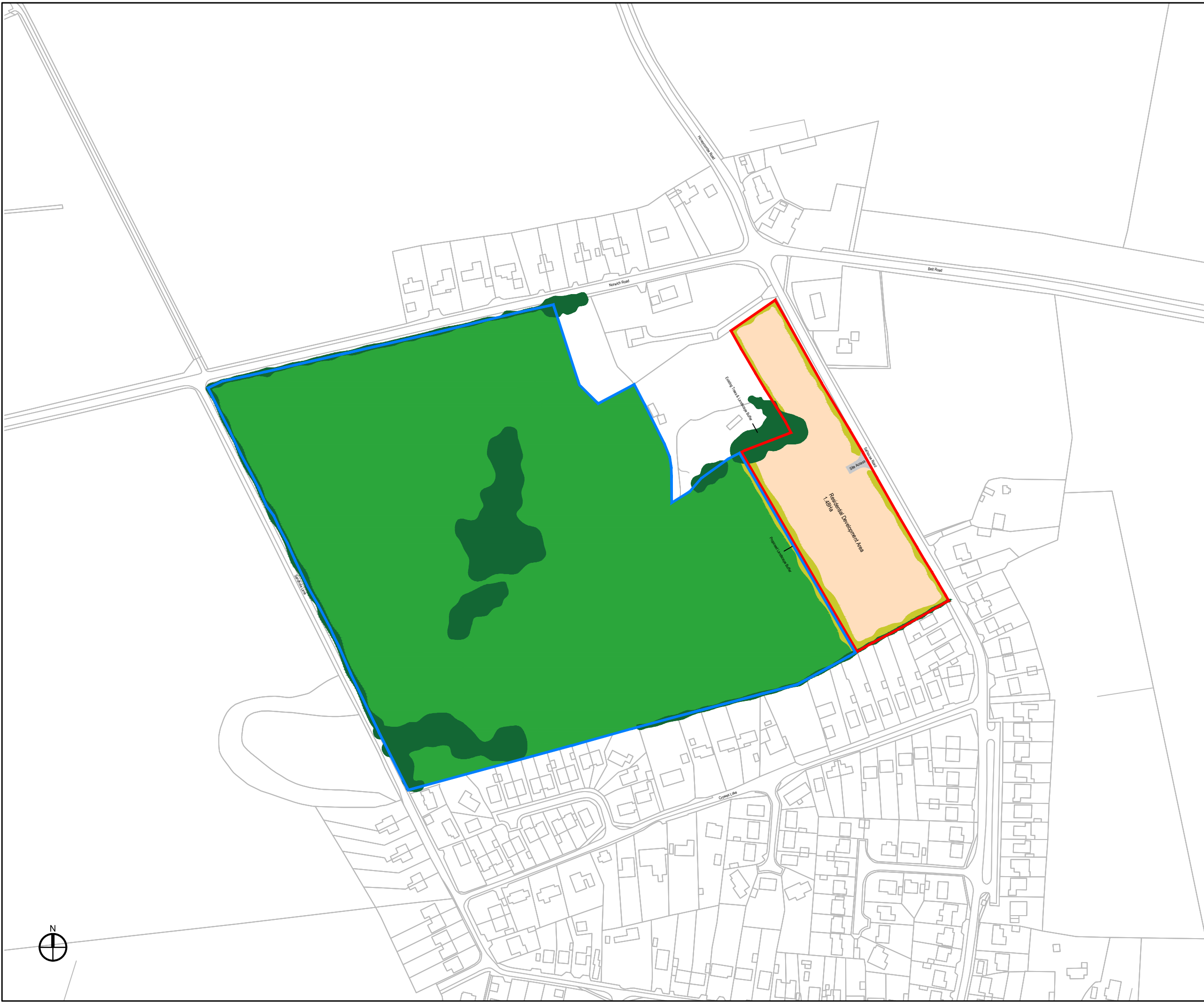
Yours sincerely

Hannah Smith
Associate Director, MRTPI, AIEMA



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Appendix 1 – Promoted land



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DRAWING STATUS S0 - Initial Status
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CLIENT Glavenhill

DRAWING TITLE Site Schematic Arrangement - GNLP Reg 18C Consultation	SCALE 1:2500@A3
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Norwich Office: Brettingham House, 98 Pottergate, Norwich, NR2 1EQ
Tel 01603 631 319 www.pro-works.com

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Appendix 2 – HELAA Assessment

HELAA Category	GNLP Assessment of GNL0483R	Lanpro Assessment (on behalf of Glavenhill) of GNL0483R	Reasoning
Access	Amber	Green	A safe point of access can be created onto Salhouse Road as per the previous planning application.
Accessibility to Services	Amber	Green	The site is easily connected to local services either within walking distance or within easy access of bus services.
Utilities Capacity	Green	Green	Utility enquiries undertaken to support the previous planning application at the site confirmed that there is sufficient capacity in the local network for the previous 84 dwelling scheme. Whilst there will be a need for some upgrades to the water infrastructure and the potential (subject to the precise location of development) for some rerouting of electricity cables, there are no utility restrictions which would prevent development of this site.
Utilities Infrastructure	Green	Green	As above
Contamination and Ground Stability	Green	Green	An assessments of the site's ground conditions was submitted to the LPA as part

			<p>of the previous application at the site.</p> <p>The assessment confirms that the risks posed by ground contamination and or land stability are not of such significance to render the site undevelopable or through the application of appropriate mitigation and remediation to pose an unacceptable risk to users of the site.</p>
Flood Risk	Green	Green	<p>The site is located within flood zone 1. A surface water drainage strategy and Flood Risk Assessment has been completed as part of the previous 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.</p>
Market Attractiveness	Green	Green	<p>The site is being promoted by Glavenhill with good interest from housebuilders.</p>
Significant Landscapes	Amber	Green	<p>The planning inspector who determined the previous planning appeal confirmed that the site is “far from significant in landscape terms”.</p>

Townscapes	Amber	Green	The Inspector also confirmed that development can, through appropriate design, “reflect the village like density of development to the south”.
Biodiversity and Geo-diversity	Green	Green	<p>An ecology survey was undertaken across the original proposed allocation area as part of the previous planning application. 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.</p> <p>These species can be effectively accommodated or mitigated for at the relevant stage.</p>
Historic Environment	Green	Green	An archaeological desk based assessment was undertaken and submitted as part of the previous planning application at the site. Records show that the site was occupied by a brickworks through the

			<p>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.</p> <p>The Historic Environment Service raised no objection to the previous application.</p> <p>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.</p>
Open space and GI	Green	Green	The site retains a considerable proportion of the wider ownership area as open space. Sufficient landscaping and usable public open space can be accommodated on the site.
Transport and Roads	Amber	Green	The Highway Authority has confirmed no objection to the impact of 20 to 25 dwellings at the site on local highway capacity.
Compatibility with Neighbouring uses.	Green	Green	The site is located adjacent to residential dwellings. The



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			proposed use is supportive of adjacent land uses.
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