

**Salhouse Parish Council**  
**GNLP Regulation 18 Consultation – New, Revised and Small Sites – Nov. 2018**

Salhouse PC previously submitted comments on the sites put forward in the 2016 'Call For Sites' consultation. These comments submitted in January 2017 still stand and are attached for reference.

Two changes have occurred since early 2017. First, our previous comments included references to the Draft Salhouse Neighbourhood Plan, which was subsequently adopted in July 2017. Second, since March 2018, the land supply in Broadland District has been calculated at more than 5 years.

Salhouse PC believes that the 'Call For Sites' process is fundamentally flawed, in that it encourages opportunistic offers of sites instead of being plan-led. A further local concern is that the services infrastructure (particularly mains water and electricity and sewerage) in Salhouse is in a very poor state. No additional housing development should be considered without these services being completely upgraded to meet the extra demand.

Although there are no new sites listed for the Parish of Salhouse in the latest 2018 submissions, there are sites in adjacent parishes which approach very closely to Salhouse's boundaries, raising the prospect of continuous housing from Norwich to Salhouse if all the options were taken up.

### **Wroxham**

Considering the proposed sites for Wroxham, site number GNLP 2135 lies between the Salhouse/Wroxham road and the railway line, and is only 'a field away' from the Salhouse parish boundary. This would be a massive expansion (more than 100%) of the existing recent Wherry Gardens development, and it would have a huge visual impact on the character of the rolling landscape in this area as it would be visible from a considerable distance from both the road and rail. It would also leave Salhouse hemmed in by development on the Wroxham side, especially if site no. GNLP 2131 on the east side of the road also goes ahead. Development of site 2135 in particular would conflict with Policy 2 of the JCS as it would fail to maintain the strategic gap between the communities of Wroxham and Salhouse and damage the landscape settings of the two villages and their approaches. This development would also conflict with Broadland Policy EN 2 *Landscape* which refers to the local Landscape Character Assessment and the protection of gaps between settlements, particularly in this case the valley forms of the river Bure and unique geological/geomorphological landforms in this area, which need appropriate protection.

### **Rackheath**

Considering the proposed sites for Rackheath, site numbers GNLP 0095, 2166, 2092 and 2040 will all contribute to the effect of continuous development from the Norwich city boundary to Salhouse, especially if the earlier sites nos. GNLP 0487 (now Planning Application 20170243), 0493, 0164 and 0163 were all allowed to go ahead within the Salhouse parish boundary. Development of these sites would conflict with Policy 2 of the JCS and Broadland Policy EN 2 as it would fail to maintain the strategic gap between the communities of Sprowston and Rackheath and Rackheath and Salhouse respectively, and would damage the landscape settings of the two villages and their approaches. It would

also conflict with Policy GT 2 *Green Infrastructure* of the Broadland North East Growth Triangle AAP which seeks to protect an area either side of the NDR from inappropriate development. Various other proposed sites in Rackheath also conflict with this policy.

### **City of Norwich**

In the previous GNLP consultation, the Parish Council submitted views supporting employment growth in order to keep the City of Norwich financially viable. The map of proposed sites in Norwich shows the redevelopment of Chapelfield, the Archant site in Rouen Road/Cattlemarket Street/Golden Ball Street and the old Sorting Office on Thorpe Road/Lower Clarence Road. If the GNLP is committed to providing more jobs in the City, turning these sites into housing does not seem to match that aspiration.

As a member of the CPRE Alliance of local Town and Parish Councils, Salhouse supports the principles of CPRE's case for phased development. This would include:

- prioritisation of brownfield sites, especially those within or close to the City of Norwich
- a policy of building out existing sites before approving any new sites
- prioritisation of sites and the creation of a reserve list to accommodate any future increases in demand.

## **Salhouse Parish Council - Comments on Submitted Sites within Salhouse 2016-7**

### **GMLP0157 – Land to the north of Salhouse Road**

No details of the proposed development are given, other than “Tourism Use”. This offer refers to land which is already in use as a seasonal campsite. The initial 3 year consent is currently being reviewed. There have been numerous complaints so far in relation to vehicular access and parking. The landowner has indicated to the Parish Council that he would like to develop the site more permanently, with camping chalets, yurts, etc. The site is in a highly valued, environmentally sensitive and historic landscape and a prime tourist amenity, within the Salhouse Conservation Area and partly within the Broads Authority area.

We would have no objections to continued tourism use, provided (1) the proposed use covered no greater an area and was designed to attract no more users than currently; (2) the density and visual impact should be no greater than at present; (3) the use is seasonal as at present; (4) car parking and access issues can be resolved without adversely affecting the landscape or environment and (5) in the longer term, the development is only temporary, ie. it can ultimately be removed with no lasting impact on the landscape.

### **GMLP0160 – Land to the south of Stonehouse Road**

We would object to this on the grounds that: (1) the development would be too far from the village to be considered part of the Salhouse community; (2) there would be an adverse impact on the setting of Hagg Wood, an area of designated Ancient Woodland; (3) there would be an adverse visual impact on the setting of the Salhouse Conservation Area around the Church (in contravention of Conservation Area policies); (4) the site would occupy an area of high landscape value.

Does not comply with policy H1 of Salhouse Neighbourhood Plan

The lack of any detail of the scale or type of development make it impossible to comment further.

### **GMLP0161 – Land to the west of Bell Lane and to the north of Hall Drive**

We would object to this on the grounds that: (1) there would be an adverse visual impact on the setting of the Salhouse Conservation Area which surrounds the site on three sides (in contravention of Conservation Area policies); (2) only available access would be onto Bell Lane, which is already over capacity and would create a hazardous junction; (3) there would be an adverse impact on the historic setting of Salhouse Hall, a Grade II listed building, and Hall Wood, an area of designated Ancient Woodland; (4) the site is a WW2 war grave and unexplored archaeological site; (5) the site would occupy an area of high landscape value.

Does not comply with policy H1 of Salhouse Neighbourhood Plan

The lack of any detail of the scale or type of development make it impossible to comment further.

### **GMLP0163 – Land to the north of Norwich Road**

We would object to this on the grounds that: (1) there would be an adverse visual impact on the setting of the Salhouse Conservation Area which adjoins the site on two sides (in contravention of Conservation Area policies); (2) there would be an adverse impact on the historic setting of Salhouse Hall, a Grade II listed building; (3) there would be an adverse impact on the historic setting of Hall Drive and the Coach Drive, both parts of the historic setting of Salhouse Hall and the Conservation Area; (4) the site would occupy an area of high landscape value.

Does not comply with policy H1 of Salhouse Neighbourhood Plan

Some small scale development along Norwich Road might be acceptable, although this might be considered 'ribbon development'. The lack of any detail of the scale or type of development make it impossible to comment further.

GNLP0164 – Land to the north of Norwich Road

We would object to this on the grounds that: (1) there would be an adverse visual impact on the setting of the Salhouse Conservation Area which adjoins the site (in contravention of Conservation Area policies); (2) there would be an adverse impact on the historic setting of Salhouse Hall, a Grade II listed building; (3) there would be an adverse impact on the historic setting of Hall Drive and the Coach Drive, both parts of the historic setting of Salhouse Hall and the Conservation Area.

Does not comply with policy H1 of Salhouse Neighbourhood Plan

Some small scale development along Norwich Road might be acceptable, although this might be considered 'ribbon development'. The lack of any detail of the scale or type of development make it impossible to comment further.

GNLP0175 – Site off Bell Lane

We would object to the development of this whole site as shown, on the grounds that: (1) there would be an adverse visual impact on the setting of the Salhouse Conservation Area which adjoins the site (in contravention of Conservation Area policies); (2) the site as proposed is too large in relation to the scale of the adjacent village setting; (3) the site would occupy an area of high landscape value and would irrevocably damage this aspect of the approach to the village; (4) the amenity of properties immediately adjacent on Lower street would be adversely affected; (5) an exit onto Bell Lane would be too hazardous.

Does not comply with policy H1 of Salhouse Neighbourhood Plan

We would cautiously support development of a small part of the site; namely, the area most recently used as an equestrian centre, behind the Jubilee Hall, as a community of sheltered bungalows for older people or alternatively light industrial/commercial development for start-up businesses to replace what was lost when the garage site was developed for housing. This would comply with Policies H3 and EMP2 of Salhouse Neighbourhood Plan

GNLP0188 – Site adjoining Norwich Road

This site has been offered before and was rejected by the Parish Council. Access to and from this site would require residents to cross the very busy Norwich Road; objections were made previously by residents of the bungalows opposite, whose light and view would be lost especially if the development were of two storey houses. A development of bungalows might be considered.

GNLP0189 – Site off Lower Street

We would strongly object to any development of this site on the grounds that: (1) this site is entirely within the Salhouse Conservation Area; (2) views into, out of, and across the Conservation Area would be damaged (destroyed, in fact) and this would be in contravention of policies on the Conservation Area; (3) the site is at the centre of an area of high landscape value, essential to the rural character of the village, and affecting the aspect of the landscape leading down to Salhouse Broad.

Does not comply with policy H1 of Salhouse Neighbourhood Plan

GMLP0226 – Manor Farm, land west of Wroxham Road

In relation to Salhouse, this site is very remote indeed; most people would even be unaware that it is part of the parish of Salhouse. Development of 1,000 houses on this site would put extreme traffic pressure on the A1151 road and would have an environmental impact on the area around Dobbs Beck.

Does not comply with policy H1 of Salhouse Neighbourhood Plan

GMLP0487 – Land north of Norwich Road

This site has been the subject of a more detailed outline plan for the development of 86 dwellings which was presented to the Parish Council in December 2016. The following comments are therefore more detailed than for other sites and are based on the outline plan as presented:

Comments on Proposals for Offered Site Ref. GMLP0487

- A previous proposal for 20 dwellings on part of the same site was put forward in 2014. SPC declined to support it after objections by parish residents. A crucial part of that proposal was for a footway along the Norwich Road from the Station Road bus stop. This was rejected by Highways on the grounds that the width of available Highways land on that side was too narrow in places to support a path.
- This new proposal also includes a footway along the same section of road. Mr. Phil Atkinson of Lanpro stated at the presentation that this had already been approved in advance by Highways. It seems unlikely that Highways would unequivocally support this in advance of a formal PA and in the light of the previous refusal.
- Previous policy by the District Council has been that infilling the green space that exists between the two villages of Salhouse and Rackheath should not be permitted and a green space between them should be retained. It is noted that that on the current plan virtually all the houses are out of sight of the main road. This is a benefit in relation to maintaining the 'green space' between settlements, but probably the developer has no choice in this matter because the high pressure gas main from Bacton crosses the site, and a no-build exclusion zone applies.
- As a result of the need for a no-build zone, the developer is proposing a park to be included in the development. We should be extremely vigilant that this green space is not eroded as the plans develop, as we have seen on other sites.
- The park proposal is all well and good, but access to the park by other residents of the village, apart from those living on site, will be of necessity by car only with access from Norwich Road. Pedestrian access is required.
- Pedestrian access to the estate could easily be achieved from Wood Green. Pedestrian access by this route would allow access to Salhouse railway station and to the main part of the village on foot via footpaths without having to venture onto the main road. This should be incorporated into the plans.
- Road access to the estate is by a single T-junction onto the Norwich Road. Given the number of homes proposed, this would be hazardous and a cause of delay and frustration for drivers at busy times. A second road access should be considered via Wood Green. However, this would adversely affect the residents there.

- The site also includes a wetland pond. This is surprising, given that the site is at one of the highest points in the locality (approx. 30m OD) and there is no history of drainage issues.
- The affordable houses are very densely packed and very close to the rear boundaries of properties on Norwich Road, most are bungalows and will be overlooked by the affordable houses.
- Does not comply with policy H1 of Salhouse Neighbourhood Plan

GMLP0493 – Land south of Norwich Road

Development of this site as shown would be 'ribbon development'. It involves the infilling of the green space that exists between the two villages of Salhouse and Rackheath, contrary to previous policy that has stated that this should be retained. The high pressure gas main crosses this site, rendering a large part of it undevelopable.

Does not comply with policy H1 of Salhouse Neighbourhood Plan