

16 March 2020
Reps to Reg 18 GNLP - GNLP0388 Coltishall



Greater Norwich Local Plan Team

By email to: gnlp@norfolk.gov.uk

Stuart House
St John's Street
Peterborough PE1 5DD
T: +44 (0) 1733 567 231
F: +44 (0) 1733 894 649
savills.com

Dear Sirs,

REPRESENTATIONS TO GREATER NORWICH LOCAL PLAN

STAGE C REGULATION 18 DRAFT STRATEGY AND SITE ALLOCATIONS

GNLP0388 – LAND EAST OF ST JOHN'S CLOSE, COLTISHALL

Savills (UK) Ltd are instructed on behalf of the Diocese of Norwich to submit representations in support of the site identified as 'GNLP0388' within the emerging Greater Norwich Local Plan (GNLP).

This covering letter comprises our representations to the current consultation.

Previous representations have been made in support of this site to the Broadland Site Allocations Consultation – Preferred Options 2013 and Greater Norwich Local Plan Call for Sites 2016. A copy of the 2013 representation can be found at Appendix A.

We have reviewed the assessment of the site provided within the GNLP Sites Document, and make the following comments in relation to its delivery. In addition, the draft allocations for Coltishall in the current Draft Strategy and Site Allocation Document have been reviewed with a view to assessing their suitability for allocation.

Comments on GNLP0388 – Lane east of St John's Close, Coltishall

Context

It is first pertinent to review the site within the context of Coltishall's position in the proposed settlement hierarchy and the distribution of growth.

The site is located within Coltishall, which is defined by the emerging Greater Norwich Local Plan as a 'village cluster' alongside Horstead with Stanninghall and Belaugh. Coltishall, Horstead with Stanninghall and Belaugh are within the administrative boundary of Broadland District Council.

In describing Coltishall, Horstead with Stanninghall, and Belaugh, the emerging GNLP Sites Document states:

"The catchment of Coltishall Primary School brings Horstead with Stanninghall and Belaugh in to a village cluster. There is currently limited capacity at the school, although the site is not landlocked and could be expanded."



It is considered that as well as existing allocations, approximately 50-60 new homes are appropriate for the Coltishall cluster. The proposed new allocation does not amount to this figure; however, further development is not ruled out. Windfall development policy 7.4 allows an amount of growth in each village cluster that reflects primary school capacity. The villages have a wide range of core and secondary services, including good public transport links. The majority are in Coltishall and Horstead. Belaugh has very few services.

One site is identified as a preferred option, providing for between 20-25 new homes in the cluster. There are two carried forward residential allocations for 55 homes and a total of 15 additional dwellings with planning permission on small sites. This gives a total deliverable housing commitment for the cluster of between 88-93 homes between 2018 – 2038.

Horstead has a neighbourhood area designated and the parish council is working on an emerging Neighbourhood Plan (at time of writing). Any applications that are submitted for development within the parish should take into account the emerging Neighbourhood Plan for the area, in line with paragraph 48 of the National Planning Policy Framework’.

All new and carried forward allocations are expected to address standard requirements associated with development. These vary from place to place, but are likely to include mitigations for flood risk (as well as SUDs), highways improvements, safeguarding of minerals resources, land remediation, measures to protect the environment, biodiversity, and landscape intrusion.”

The GNLPS Sites Document in its assessment accepts that Coltishall, Horstead with Stanninghall, and Belaugh could accommodate development of 50-60 additional homes over and above the existing allocations, which would be in general conformity with the Strategy Document which supports new residential allocations in this tier of the settlement hierarchy. One draft allocation is proposed providing for between 20-25 new homes in the cluster. Our client would therefore encourage the Council to reconsider the inclusion of land east of St John’s Close (GNLP0388) as a proposed allocation given its potential to meet this outstanding housing need (25-30 additional homes) and contribute to the district’s overall housing supply.

Below the site is considered against the tests within the NPPG¹, confirming that it is suitable, available and achievable for development purposes.

Suitable

Accessibility to Services

Encouraging growth in sustainable settlements within rural areas is in accordance with 2019 NPPF and is considered vital to the long term sustainability of rural communities (NPPF para 78).

Coltishall, Horstead with Stanninghall, and Belaugh is identified as a ‘cluster village’ in the Strategy Document. Whilst this is the lowest tier within the settlement hierarchy, it is importantly acknowledged in paragraph 164 part d that, ‘*the approach to village clusters is innovative. It reflects the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages*’. It is therefore important that proportionate growth occurs in the smaller settlements to ensure that they remain a sustainable location for their residents.

Coltishall, Horstead with Stanninghall, and Belaugh, have a small number of services and facilities including a village hall, public house, primary school, food shop, medical practice and public transport service. These are within easy walking/cycling distance of the site.

¹ Paragraph: 019 Reference ID: 3-019-20140306; Paragraph: 020 Reference ID: 3-020-20140306; and Paragraph: 021 Reference ID: 3-021-20140306

The villages are also well related to Norwich where a number of facilities and services exist including leisure and employment. They are also located a short distance from strategic highway infrastructure in the form of the B1150. There is a bus stop located under 150m from the site which is served by four bus routes, the 3, 5A, 55 and 837 providing regular services to surrounding settlements including Norwich.

Townscapes and Landscapes

The site is well related to the existing settlement and is adjacent to the settlement boundary. St John's Close and Rectory Close are located immediately to the west, with allotments to the south and further built development beyond. Coltishall Primary School is located to the north. Open countryside can be found to the east, however the site is neatly bounded by extensive mature trees and hedging along its boundaries which largely screen the site from the surrounding area. This screening could be further enhanced through an appropriate landscaping scheme as part of the site's development.

Transport and Roads

In describing GNLP0388, the GNLP Sites Document states:

"This site is well located near to Coltishall Primary School but is considered to be unreasonable for allocation on highway grounds. The site has two potential points of access (south of Rectory Close and via St John's Close). South of Rectory Close is narrow and it would not be feasible to achieve an acceptable visibility splay. St John's Close is a cul-de-sac where Coltishall Primary School is located. There is an existing parking issue on the road and as such it would not be appropriate to service a development from it. The conflict between development and school traffic/parking would result in a safety concern."

In direct response to the above comments, our client has instructed Royal HaskoningDHV to undertake a review of the site's access opportunities and prepare a Highways Technical Note to inform the site's promotion for residential development. This technical note is in underway at present and will follow in due course, however its initial findings indicate that access can be achieved from St John's Close and there is a further opportunity for a dedicated cycleway and footway to and from Rectory Road.

Our client would also like to stress that the site, previously promoted in the Site Allocations Development Plan Document in 2013, whilst being identified as having access constraints, Norfolk County Council (NCC) as the Local Highway Authority indicated that an acceptable vehicular access was likely from St. John's Close. This response correlates with the results of the HELAA which concluded that *"initial highway evidence has indicated that an acceptable vehicular access is likely from St John's Close. Also, it is believed that, subject to suitable footpath provision, any potential impact on the functioning of local roads could be reasonably mitigated"*.

An allocation could also improve pedestrian accessibility to the school and surgery through the provision of a new footpath and cycle link through the allotments from King's Road in conjunction with the Parish Council. This would provide a shorter and safer pedestrian route from south eastern parts of the village.

It is noted that previous concerns have been raised over staff parking for the primary school, noting this and given the sites position immediately adjacent to the primary school, it is considered that an allocation could bring forward an area of land to provide additional car parking at the school.

Other Comments

There are few physical limitations or constraints on the site which would make development of the site difficult or unacceptable. The site is not located within Flood Zones 2 and 3 and is not subject to any PROW which may affect development of the site.

Available

The site is within the ownership of two parties, however they are working jointly to bring development of this site forward. The site is therefore available for development. Should the site be accepted as an allocation for residential development, Savills would be able to act on our client's behalf with a view to identifying a suitable development partner as soon as possible.

Achievable

As noted above, there are no known major technical constraints relating to the site and therefore it is considered its development would be economically viable. Services including electricity, mains water, foul sewerage and telecommunications are available.

There are no other known factors that mean development would be difficult or unachievable. Therefore, it is clear that this site presents a deliverable option for housing and could make a material contribution to the housing targets of the district.

Comments on Draft Allocation GNLP2019

In describing draft allocation GNLP2019, the GNLP Sites Document states:

“After careful consideration this is the only site considered suitable for allocation in Coltishall. Vehicular access will need to be taken through adjacent existing Broadland Local Plan COL1 allocation and a Transport Assessment will be needed.”

Following a review of the site, our clients have concerns regarding for the inclusion of GNLP2019 as an allocation for the village.

Firstly, our client considers the site to be unreasonable for allocation on highway grounds. In its present state it seems unlikely that Rectory Road could accommodate an increased allocation of at least 50 new dwellings on the site without upgrade works including carriageway widening. Even if this is possible, there is no evidence to demonstrate whether or not Rectory Road's would be able to accommodate an increased number of vehicle movements at this point. The provision of road widening may mean infrastructure costs are higher than on other sites where access is already suitable or could be made so in a relatively straightforward manner.

In addition, any vehicular access would be located immediately opposite a row of bungalows on Rectory Road. The introduction of vehicle movements associated with at least 50 new dwellings in this location has the potential to have an impact on residential amenity with vehicle headlights shining directly into the windows on their principle elevations.

It is therefore considered that the inclusion of this site would not be in accordance with paragraph 108 of the NPPF, which states that:

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

Furthermore, it is considered that draft allocation GNLP2019 would result in a significant incursion into the open countryside, being open to the north and east of the site. GNLP2019 is also some distance further from the village's primary services and facilities than other proposed allocations, including our clients site 'GNLP0388'.

It is considered that GNLP0388 'land east of St John's Close' represents a more realistic and attractive option for development in Coltishall over the plan period. The site is considered to be suitable, available and achievable for development as set out above.

Comments on Carried Forward Allocation COL2

In describing COL2, the GNLP Sites Document states:

"COL2: This site was allocated in the 2016 local plan but has not yet been developed. The principle of development on the site has already been accepted and it is expected that development will take place within the time-period of this local plan up to 2038. The site is considered in the calculation of the housing requirement, providing at least 25 homes, but more may be accommodated, subject to an acceptable design and layout being achieved."

Paragraph 23 of the NPPF states that:

"... Strategic policies should provide a clear strategy for bringing sufficient land forward ... to address objectively assessed needs over the plan period ... This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area ..."

In short, the strategic policies in a Development Plan need to identify the objectively assessed housing need/housing requirement, and allocate sufficient sites to deliver this need/requirement.

Paragraph 35 of the NPPF sets out that (our emphasis added):

"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:

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"

Paragraph 67 of NPPF states that:

"...planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and*
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."*

Our client has severe reservations regarding COL2 and its inclusion in the GNLP. This would be the second 'Plan' that COL2 has been carried forward into which raises significant questions over the sites deliverability. Our client therefore contends that this site will not come forward for development within this plan period and therefore this allocation would fail the tests of soundness as set out in the NPPF and should be removed as an allocation.

It is considered that GNLP0388 'land east of St John's Close' represents a more realistic and attractive option for development in Coltishall over the plan period. The site is considered to be suitable, available and achievable for development as set out above, and would ensure sufficient sites are allocated in Coltishall to meet the identified housing need/requirement in accordance with the NPPF.

Coltishall Neighbourhood Plan

It is acknowledged that Coltishall with Horstead and Stanninghall are progressing with the preparation of their neighbourhood plan. This is still at its early stages, however, it is acknowledged that once made this will form part of the Development Plan for the site.

Conclusions

It is considered that land east of St John's Close (GNLP0388) is sustainable and deliverable as defined by the NPPF, and a suitable location for residential development. The site, within the ownership of the Diocese of Norwich and Mr P Playford, represents an attractive option for housing growth within the District.

Our client has concerns regarding the draft allocation GNLP2019 and carried for allocation COL2, and would therefore suggest that 'GNLP0388' land east of St John's Close represents a more realistic and attractive option for development in Coltishall over the plan period, whether it comes forward in full or in part.

I would be grateful if you could keep me updated in relation to the next stage of the Local Plan process and, reserve the right to appear at the Examination sessions, if required, when they take place.

Please do not hesitate to contact me should you require any further information.

Yours faithfully,

Gareth Watts MRTPI
Planner



Appendix A - Broadland Site Allocations Consultation – Preferred Options 2013 Representation

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Broadland Site Allocations Consultation – Preferred Options 2013

**Representations in support of Coltishall & Horstead Site 2:
East of Rectory Road and Southeast of Coltishall Primary School**

on behalf of The Diocese of Norwich and Mr P Playford

August 2013





Aerial view of Coltishall village

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Produced by Savills Urban Design & Planning Team

Savills (UK) Ltd
Unex House
132-134 Hills Road
Cambridge
CB2 8PA



For further information contact:

Will Lusty
E: wlusty@savills.com

T: 01223 347000
F: 01223 347111

1. Introduction

- 1.1 This document has been prepared by Savills on behalf of The Diocese of Norwich and Mr P Playford as part of representations to Broadland District Council's Site Allocations Development Plan Document (DPD) Preferred Options Consultation. Coltishall & Horstead Site 2: East of Rectory Road and Southeast of Coltishall Primary School (Coltishall & Horstead Site 2) is in two ownerships; the first being Diocese of Norwich (the northern part of the site) and the second being three members of one family, Marion Playford, Jill Wye and Sara Clethero, represented by Mr P Playford (the southern part of the site).
- 1.2 Specifically, this document forms part of a representation to object to the Preferred Options consultation in that Coltishall & Horstead Site 2 has not been identified as a Preferred housing site. As such, we consider that Coltishall & Horstead Site 2 should be identified at the next consultation stage, which is programmed to be the Submission version of the Site Allocations DPD, as a housing allocation, instead of the Council's Preferred site at this stage, which is Land off Rectory Road, Coltishall. It is therefore the purpose of this document to explain why we consider that Coltishall & Horstead Site 2 should be allocated for housing development.
- 1.3 The site itself is currently agricultural land and its topography is level.



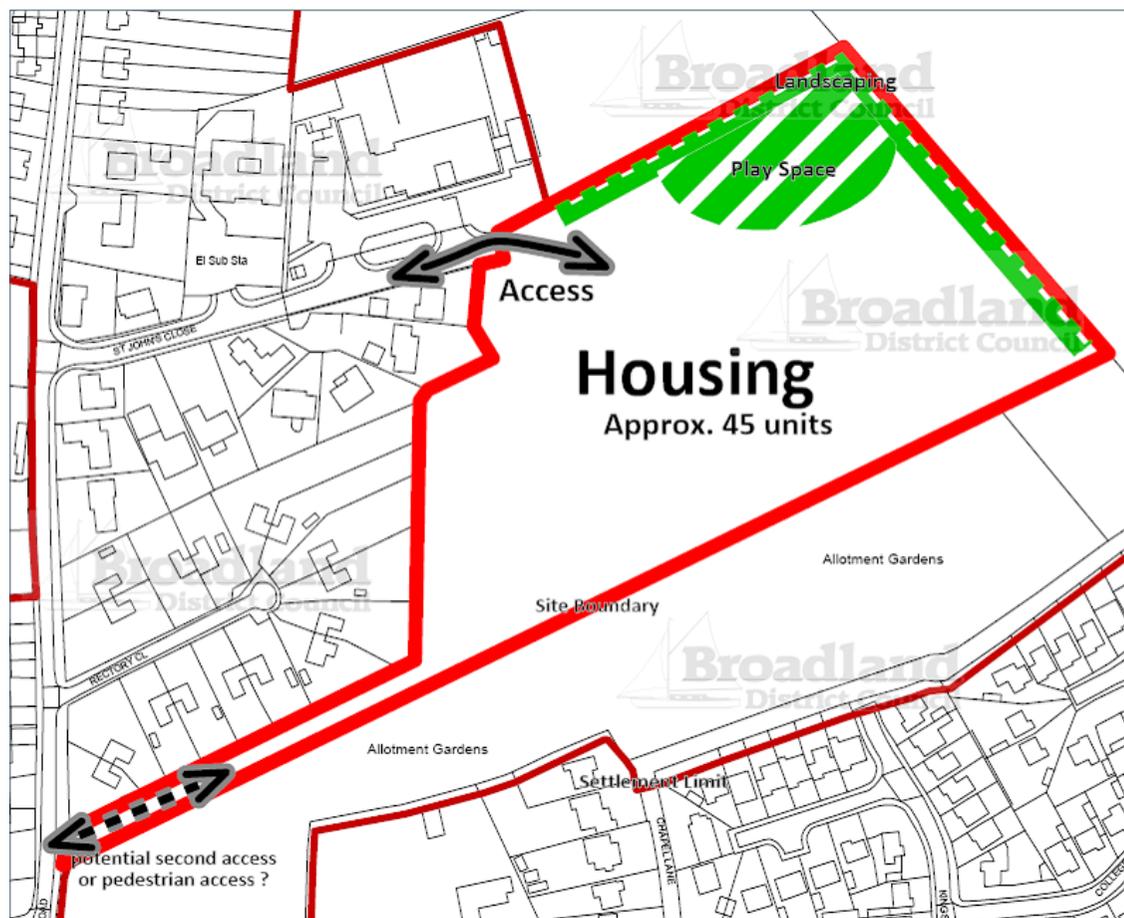
Location plan



Site plan

2. Previous Site Allocations DPD Consultations

- 2.1 In terms of previous consultations undertaken by the Council, Coltishall & Horstead Site 2 was identified as a 'shortlisted site' in the Site Allocations DPD consultation of the same name, which took place during Autumn 2011. Two other sites at Coltishall & Horstead were consulted upon at that time, being land to the east of Station Road, Coltishall and Frettenham Road, Horstead.
- 2.2 The Council subsequently consulted upon 'additional alternative sites' for the Site Allocations DPD in Summer 2012. These additional sites included land at Rectory Road, Coltishall, land at Buxton Road, Horstead and land at Frettenham Road, Horstead. The former of these three sites, land at Rectory Road, has been taken forward by the Council as its Preferred housing site in the Preferred Options Consultation.



Extract from the Broadland District Council's previous Site Allocations DPD Consultation

3. Coltishall & Horstead Site 2: East of Rectory Road and Southeast of Coltishall Primary School

- 3.1 We consider that Coltishall & Horstead Site 2 is the most suitable site at Coltishall and Horstead for housing development that has been identified to date through the Site Allocations DPD process. Indeed, the site is located in close proximity to key services in the village, such as the school and doctor's surgery and these more accessible to Coltishall & Horstead Site 2 than the Council's preferred site. The site is also well located in terms of its proximity to other services and facilities in the village such as the village store and post office, which lies within walking distance. The site is also available for development and development of the site is deliverable, with all landowners working jointly to bring development forward.
- 3.2 We have developed two concept layouts to show the principles of two approaches to development of the Coltishall & Horstead Site 2. These concepts seek to address matters raised by the Council's assessment of the site as contained within the Planning Assessment for Site Allocations which accompanies the Preferred Options Consultation and also in comments made by the local community. We have also sought to engage with the local community and these concepts also follow meetings that we have held with Coltishall Parish Councillors on 10 March 2013 and Mr Playford's meeting with the head teacher of Coltishall Primary School on 22 July 2013.
- 3.3 The Council's assessment of the Coltishall & Horstead Site 2 recognises that consultation responses have commented upon the narrowness of St John's Close and limited visibility at the corner of St John's Close with Rectory Road, although we notice that the Council's assessment acknowledges that the Local Highway Authority indicates that an acceptable vehicular access is likely from St John's Close, or possibly from Rectory Road if using the existing allotments access. Furthermore, Norfolk County Council as the Local Highway Authority has stated that Coltishall & Horstead Site 2 is their preferred site in Coltishall and Horstead. The Council's assessment also refers to other highways matters that have been raised through consultation, which include street car parking causing congestion along Rectory Road, the limited availability of parking at the school and the risks to children posed by speeding motorists.

Spatial masterplan - Option 1

- 3.4 In light of the above comments, the Option 1 spatial masterplan shown opposite involves a one-way system for vehicular traffic through the site. This would be achieved with an ingress from Rectory Road using the land along the northern boundary of the allotments. Traffic leaving the development would then egress along St John's Close. This approach would help to minimise the number of traffic movements along St. John's Close. A car-parking area would also be provided within the development for school staff, which would help to reduce on-street parking on St John's Close and congestion at pick-up and drop-off time. The masterplan also involves the provision of a pedestrian route through the site from King's Road, which will provide a shorter and safer pedestrian route to the school and surgery from south eastern parts of the village, without need to use Rectory Road. It is understood from our meeting with the Head Teacher of the primary school that he would be supportive of the pedestrian/cycleway link to Kings Road.



Spatial masterplan - Option 2

3.5 The Option 2 spatial masterplan shown opposite involves the same principles as the Option 1 masterplan, but instead uses the corridor of land along the northern boundary of the allotments as parking for the allotments. Around 10 car parking spaces in this area could be achieved using an angled parking arrangement. A small area of the allotment land would then be needed in order to provide a turning area for vehicles. A pedestrian and cycle route would also continue through this parking area to provide a dedicated pedestrian and cycle route from the development to Rectory Road.

-  Site boundary
-  Existing development
-  Doctors surgery
-  Coltishall primary school
-  Proposed open space
-  Proposed school staff parking
-  Proposed allotment parking
-  Proposed landscape buffer
-  Proposed development
-  Primary vehicular access
-  Restricted access - Allotment holders only
-  Pedestrian/cycle only routes



4. Illustrative concept plan

- 4.1 Based on the spatial masterplan option 2 we have prepared this illustrative concept plan to demonstrate how future development could potentially be designed and delivered.
- 4.2 This proposal illustrates a single point of access to the residential development from St. John's Close.
- 4.3 New staff parking has been provided close to the school and a new restricted access and parking for the allotments holders has been provided off Rectory Road. A turning area has been incorporated to ensure that cars are able to enter and leave in a forward gear. This will help to free up existing turning and drop-off space at the front of the school.
- 4.4 A new central green will create an attractive and usable area of open space and focal point to the scheme. New homes will frame and enclose the space and provide informal surveillance. Together with the proposed pedestrian & cycle link through the existing allotments the green space will provide a new safe pedestrian route, linking the existing development to the south to the primary school and medical practice to the north, avoiding the main road.
- 4.5 New landscape buffers would be planted to help soften the development and provide natural screening along sensitive edges.



5. Conclusion

- 5.1 The site lies within the ownerships of our two clients and they are working jointly to bring development of this site forward. The site is therefore available for development.
- 5.2 The site is level and relates well to the built-up edge of the village. Access can be achieved from St John's Close and there is a further opportunity for either a one-way vehicular access from Rectory Road, or parking for the allotments and a dedicated cycleway and footway to and from Rectory Road. Development of the site is therefore considered to be achievable.
- 5.3 Our proposed options for access to the site also seek to respond to comments from the local community about traffic increases on St John's Close. The proposal to provide additional car parking for members of staff at the school is also part of this. Norfolk County Council as the Local Highways Authority has stated that Site 2 would be its preferred site.
- 5.4 We have also sought to improve pedestrian accessibility to the school and surgery through the provision of a new footpath & cycle link through the allotments from King's Road in conjunction with the Parish Council. This will provide a shorter and safer pedestrian route from south eastern parts of the village.
- 5.5 Building upon the work we have done to develop access strategies for the site, we have sought to develop a concept layout for a high quality development which also responds to the site's context. Landscape planting and a central open space are key features of this concept. We consider that the ability to successfully achieve development within the site's context, means that the site is particularly suitable for housing development.
- 5.6 Comparing Coltishall & Horstead Site 2 with the Council's preferred housing site at the northern end of Rectory Road, we consider that our clients' site is considerably more suitable for housing development. The Council's preferred site will mean development that results in a significant incursion into the open countryside, whereas our clients' site is much better related to the built up edge of the village. Our clients' site is also much closer to services and facilities in the village than the Council's preferred housing site and is therefore more sustainable than the Council's preferred housing site. We believe that this proposal will be at the heart of the community and deliver real benefit, whereas the Coltishall & Horstead Site 1 will be on the edge of the village and not fully integrated.
- 5.7 We therefore conclude that Coltishall & Horstead Site 2 should be identified at the next consultation stage as a housing allocation, which is programmed to be the Submission version of the Site Allocations DPD, instead of the Council's preferred housing site further to the north at Rectory Road.

