

# Greater Norwich Local Plan

## Regulation 18 Draft Plan Consultation

### Response Form

Thank you for responding to the Regulation 18 Draft Plan Consultation on the emerging Greater Norwich Local Plan.

The current consultation runs from. **29<sup>th</sup> January to 16<sup>th</sup> March 2020.**

It covers the **Strategy and Site Allocations**. We need to get views on these documents to help us draw up the version of the plan which will be submitted to the Planning Inspectorate.

When commenting on a policy or site, please include the site reference(s) in your comments.

If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

It is easier to respond online at [www.gnlp.org.uk](http://www.gnlp.org.uk) . If you cannot do this, please use this form to respond to the consultation on new, revised and small sites.

Consultation documents are available from [www.gnlp.org.uk](http://www.gnlp.org.uk). There are also supporting documents which provide information on our policies and sites which may help you to make your comments.

Hard copies of the documents are available at consultation "Deposit Points" at:

- County Hall, Martineau Lane, Norwich (main reception);
- City Hall, St Peters Street, Norwich (2<sup>nd</sup> floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

## **Submitting your Response Form**

Responses should be submitted by email to [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk) or completed hard copy forms should be sent to:

*Greater Norwich Local Plan Team  
PO Box 3466  
Norwich  
NR7 7NX*

**All submissions should be made no later than 5pm on  
Monday 16<sup>th</sup> March 2020.**

<b>1a. Contact Details</b>	
Title	Mr
First Name	Liam
Last Name	Ryder
Job Title (where relevant)	Associate
Organisation (where relevant)	CODE Development Planners
Address	17 Rosemary House Lanwades Business Park Kentford Suffolk
Post Code	CB8 7PN
Telephone Number	
Email Address	

<b>1b. I am...</b>	
Owner of the site <input type="checkbox"/>	Parish/Town Council <input type="checkbox"/>
Developer <input type="checkbox"/>	Community Group <input type="checkbox"/>
Land Agent <input type="checkbox"/>	Local Resident <input type="checkbox"/>
Planning Consultant <input checked="" type="checkbox"/>	Registered Social Landlord <input type="checkbox"/>
Other (please specify):	

<b>1c. Client/Landowner Details</b> (if different from question 1a)	
Title	Mr
First Name	Robert
Last Name	Blackham
Job Title (where relevant)	Director
Organisation (where relevant)	Cygnets Care Ltd
Address	c/o CODE Development Planners
Post Code	
Telephone Number	
Email Address	

**Please make your comments below. You can comment on more than one policy or site on this form. Please clearly state the reference number of the policy or site your comments refer to.**

<b>Policy or site reference</b>	<b>Comments</b>
Policy 5 – Homes (GNLP0280)	<p>The policy supports proposals providing specialist housing options for older people’s accommodation and others with support needs, including through the provision of sheltered housing, supported housing, extra care housing and residential/nursing care homes, where there is good access to local services.</p> <p>However, to meet changing needs, the policy requires at least 20% of homes proposed through major housing developments to be constructed to Building Regulation M4 (2)[1] standard or any successor.</p> <p>The supporting text to the policy (paragraphs 245 and 246) recognises the increasing proportion of the population is over 65 or disabled, which is increasing the demand for specialist accommodation across the Greater Norwich Local Plan (GNLP) area (and nationwide). Paragraph 246 recognises the need for 2,842 additional extra care units by 2028.</p> <p>The construction of 20% of homes on major development proposals to Building Regulation M4(2)[1] standard (or any successor) will not meet</p>

the ever increasing need for extra care units (or other types of specialist accommodation for older people) across the local plan area.

Planning practice guidance (PPG) (paragraph 006 Reference ID: 63-006-20190626) states *“Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.”*

In addition, the PPG considers *“Plans need to provide for specialist housing for older people where a need exists. Innovative and diverse housing models will need to be considered where appropriate”* (paragraph 012 Reference ID: 63-012-20190626).

The Regulation 18 version of the GNLP recognises the need for additional extra care units (2.842 additional extra care units by 2028) but does not make any formal allocations to meet the need over the period to 2028 (and beyond). In these circumstances and considering the advice contained within national planning policy and guidance, CODE Development Planners consider that formal allocations should be made within the GNLP to meet the need for specialist housing for older people over the plan period.

At the very least, Policy 5 (Homes) should ensure that where new specialist accommodation might best be located outside of existing settlement boundaries (but still within suitable walking and cycling distance to existing services and facilities, or where sustainable public transport options exist to provide access to those services), development is not precluded by restrictive policies which only allow development within settlement boundaries.

To assist the authorities in meeting the need for new specialist housing over the plan period, the following site (GNLP0280) on land to the south of Bungay Road, Poringland is submitted for consideration as an allocation within the emerging GNLP (please see the submitted site location plan) for a Use Class C2 facility including a care home and extra care bungalows. Please note, the site has previously been submitted for consideration for the development of 40 residential dwellings. This was before our client’s involvement.

The site is located, as shown on the appended site location plan, to the south east of the village, on the B1332/Bungay Road, which runs from Norwich to Bungay. The existing site use comprises two detached dwellings, garden outbuildings and garages and a 25 bed care home run by the Applicant (Cresta Lodge Care Home). To the rear of the properties are horse paddocks with a stable block. The site is 2.66ha in size.

The existing Cresta Lodge home is located in a bungalow on site that has been extended over the years. The home enjoys almost 100% occupancy throughout the year; however, the building is now becoming unfit for the future with small bedrooms, some without en-suites, small bathrooms and limited communal and social space. There is therefore a need to redevelop the home with a more modern facility in order to provide future residents with the necessary quality of accommodation our elderly population deserve. To do nothing here is not an option because the accommodation would become increasingly challenged and the quality of life for residents would inevitably diminish. If no further development took place on site there would be a further 25 bed reduction in care home accommodation in South Norfolk and the GNLP area.

The proposals will be designed to respect the existing character of this part of Poringland and make a positive contribution to the built environment in this location. With appropriate landscape mitigation, the adverse impacts on users of the Public Right of Way (PRoW) to the south east of the site could be minimised.

The scheme can also provide extensive social, economic and environmental benefits, as follows:

- It will help to fulfil the significant unmet demand and need for this type of care accommodation, representing the chance to deliver accommodation which will enable elderly people to stay in their own homes for longer, thereby maintaining their independence;
- In accordance with Cygnet Care Ltd's vision for the accommodation, there is an opportunity to create an environment where preventative measures to reduce ill health, promote active ageing and allow older people the enjoyment of a more fulfilled life in their elderly years;
- The development of the site would provide a real choice for older people to maintain their independence with likeminded individuals, whilst receiving care with dignity within the privacy of their own accommodation;
- Community facilities on site (to be determined) will be available on a membership basis to other members of the Poringland community thereby helping to integrate the new development and its residents with the existing village and affording residents further protection from any isolation and loneliness impacts often felt by the elderly; and
- The potential to contribute towards the release of existing housing stock, widening choice and opportunity within the general open market; particularly family housing.
- The creation of new jobs both during and after construction, particularly in the field of providing care. The likely jobs arising on-site would be management, technical, administrative, care/nursing, catering and housekeeping positions. There is also a potential for 'knock on' employment opportunities, for example, during construction and through associated services and facilities to support the on-going operation of the home; and
- The development will support existing local facilities, including shops and services in close proximity to the site, through increased spending generated by the residents, who have easy access into the village centre of Poringland.
- Biodiversity of the site will be protected, diversified and improved through new hedgerow and tree planting and hedgerow management. The proposals offer an opportunity to achieve an overall net gain in biodiversity;

The proposals would therefore deliver a sustainable form of development, providing social, economic and environmental benefits in accordance with the overarching principles of the National Planning Policy Framework (NPPF). The site is considered to be appropriate for sustainable development and its development would not result in any harm to interests of acknowledged importance.

In accordance with paragraph 35 of the Framework, the regulation 18(c) version of the GNLP (with regard to the provision of specialist accommodation for older people) is not positively prepared (as the local plan does not seek to meet, as a minimum, the need for this type of accommodation) and is not effective. However, as detailed within these representations, measures can be taken by the local planning authorities to ensure that suitable schemes can come forward beyond existing settlement boundaries (subject to being sustainably located with any

	impacts upon existing character and appearance being appropriately mitigated) and making formal allocations for specialist accommodation within the local plan (including the site to the south of Bungay Road, Poringland).
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**Please add additional sheets if necessary**

**Disclaimer**  
Data Protection and Freedom of Information  
The Data Controller of this information under the General Data Protection Regulation (GDPR)2018/Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

Once comments have been checked and verified they will be available online (with respondents' names) for others to see. Any representations which are deemed to contain offensive comments will be removed from the consultation site. Whilst we will include names on our website, we will remove personal contact details such as addresses, telephone numbers, emails and signatures before publishing.

If you wish to comment but feel that you have a strong reason for your identity to be withheld from publication, you can contact your District Councillor who will put forward your comments as appropriate. Please note that where you submit your views in writing to your local District Councillor, this is described as "lobbying" and the local member will be obliged to pass these on. The local District Councillor will be required to provide your details to the GNLP where they will be stored for their records.

Please note, however, that if you subsequently wish to comment as part of the formal Regulation 19 stage of the Greater Norwich Local Plan (due to take place in 2020) comments must be attributable for the public examination by the Planning Inspectorate.

See our Privacy notice here <http://www.greaternorwichlocalplan.org.uk/> for information on how we manage your personal information.

#### Declaration

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name LIAM RYDER	Date 16 March 2020
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#### Greater Norwich –Regulation 18 Draft Local Plan Response Form

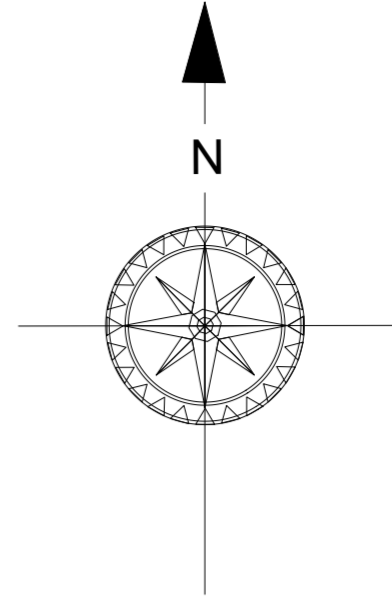
FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

Your completed form should be returned to the Greater Norwich Local Plan team **no later than 5pm on Monday 16 March 2020.**

If you have any further questions about the ways to comment, or if you need consultation documentation in large print, audio, Braille, an alternative format or a



different language, you can email us at [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk) or phone us on 01603 306603.



SITE LOCATION PLAN 1:1250

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REV.	-/-
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Client  
Cygnet Care Limited

Project Address  
Bungay Road,  
Poringland,  
NR14 7NA

Drawing Title  
Site Location Plan

Date	Scale	Drawing Ref.
07.01.18	1:1250@A2	
Job No.	Drawing Number	Revision
1705	PL25	-