

## **GNLP – REGULATION 18(C) CONSULTATION RESPONSE**

### **GNLP0420R – GREAT PLUMSTEAD**

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On behalf of our client, Mr Derek Jones, we strongly recommend that Land at Hare Road, Great Plumstead is allocated for residential development of approximately 10-15 dwellings in the emerging Greater Norwich Local Plan (GNLP).

Initially, our client's entire 10.93ha landholding was submitted as part of the Call for Sites consultation in 2016, and assigned the site reference GNLP0420. However, it was recognised that a large estate development that a landholding of this size could support may not be suitable for the local context of Great Plumstead. Following this, a further representation was made as part of the Stage A Regulation 18 Consultation in March 2018. This representation refined the original Call for Sites submission by reducing the site area to 0.871ha, to demonstrate how a small-scale residential frontage development off Hare Road could be achieved, while addressing any issues raised by the preliminary assessment of the site in the Housing and Economic Land Availability Assessment (HELAA).

Following this revision, the site was assigned a new site reference (GNLP0420R), and subsequently received an updated suitability assessment as part of the October 2018 HELAA Addendum. A further representation was submitted as part of the Stage B Regulation 18 Consultation in October 2018, to track progress from the initial December 2017 HELAA assessment to the updated October 2018 review.

Site GNLP0420R is the subject of a live planning application, submitted by Ingram Homes, which seeks outline planning permission for 10no. residential dwellings (ref: 20191938). The principle of frontage residential development in this location was established with reserved matters approval for 11 dwellings on an adjacent site of 0.98ha in October 2016 (ref: 20161151). The live planning application aims to follow the building line of the consented development, thereby achieving appropriate and proportionate residential development for Great Plumstead.

In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered within five years. The following Representation demonstrates the site's suitability, achievability, viability, and availability for allocation, to assist the Council in its allocation of development sites, by demonstrating the deliverability of the site within the Plan period to 2038.

### **Justification for Proposed Allocation**

Great Plumstead and Little Plumstead is identified as a Service Village in the Joint Core Strategy for Broadland, Norwich and South Norfolk, recognising its suitability as a location for small/medium scale residential development. Great Plumstead and Little Plumstead is designated as a Village Cluster in the draft GNLP. The Housing Spatial Distribution set out in Policy 1 of the GNLP Draft Strategy Document (Regulation 18) advises that, within Broadland, new sites in Village Clusters must be identified to deliver up to 480 dwellings. Policy 1 adds that those 480 additional dwellings will be distributed amongst those Broadland Village Clusters with 'higher potential' to accommodate growth.

Appendix 5 of the GNLP Draft Strategy Document lists Great and Little Plumstead among those Broadland Village Clusters with 'higher potential' to accommodate growth of 50-60 dwellings in the Plan period. This reflects the range of services and amenities available within the Village Cluster, which includes a primary school, village shop, village hall with car park, playing field and playground, church, allotments and a bowling green. Moreover, a local community group, with support from the Parish Council, has recently achieved planning permission for a new Community Shop/Café with a post office, located within the Walled Garden on the Little Plumstead Hospital site. This is currently under construction, and is due to open in Summer 2020. The village

is served by a bus service (KonectBus 5C), which runs through the village along Church Road, providing hourly access between the village and Norwich, Monday-Saturday. All of these services are within walking distance of GNLP0420R.

Despite this, no sites in Great and Little Plumstead have been identified for growth in the Plan period to 2038. Seemingly, the rationale for excluding new allocations from Great and Little Plumstead is due to the presence of significant existing commitments in the Village Cluster (129 dwellings). However, there does not appear to be any commentary as to whether these 129 consented dwellings are considered deliverable in terms of the NPPF definition, or if they are included in the 995 dwellings across Broadland's Village Clusters which are considered deliverable in Policy 1 of the GNLP Draft Strategy Document.

From further review of Appendix 5 of the GNLP Draft Strategy Document, the emerging draft allocations across Broadland's Village Clusters have been identified to deliver a minimum of 358 dwellings, and a maximum of 517 dwellings. This offers no guarantee that the required 480 additional dwellings are deliverable in the Plan period to 2038.

With this in mind, we consider that more sites across the Broadland Village Clusters should be allocated to give the GNLP greater resilience in securing a deliverable supply of housing land to 2038. GNLP0420R is ideally placed to provide this resilience, by providing small-scale residential development, in accordance with the parameters of the current call for additional sites across Broadland and South Norfolk's Village Cluster.

As the following section will demonstrate, GNLP0420R is a site which is entirely deliverable, and should be taken forward as a site allocation to secure sustainable growth in Great and Little Plumstead to 2038.

## **Assessment of Deliverability**

In accordance with the National Planning Policy Framework's (NPPF) definitions of 'deliverable' and 'developable', set out in the glossary, the site represents a suitable location for development now, is available immediately and is achievable with a realistic prospect of housing being delivered on the site within five years.

### ***Suitable***

As previously described, Great and Little Plumstead is identified in the GNLP Draft Strategy Document as a Village Cluster, with 'high potential' for residential growth of between 50-60 dwellings to 2038. The suitability of Great and Little Plumstead as a location for growth has already been demonstrated in the preceding section of this Representation, so the remainder of this section focusses on the suitability of the site itself.

### ***Benefits of the Proposals***

The benefits of the emerging development proposals for the site, captured within planning application ref: 20191938, are summarised below:

- The site is located to the centre of the village, immediately adjacent to the existing settlement limit and residential development. Development in this location would represent a logical and proportionate extension to the existing settlement, mirroring the built form of existing residential properties on Hare Road, integrating into the local setting in accordance with Policies 1 and 2 of the Great and Little Plumstead Neighbourhood Plan;
- The live planning application for the site seeks to deliver 10no. single storey dwellings, in response to a growing demand for single-storey properties to serve Norfolk's ageing population;
- Delivery of footpath links on Hare Road and Water Lane. The Great Plumstead, Little Plumstead and Thorpe End Garden Village Neighbourhood Plan (2015) identifies accessibility to services in the village as an issue, to be addressed through the enhancement of footpaths, especially along Water Lane, which links Great Plumstead to Little Plumstead. Similarly, Hare Road is not served by any footpaths currently, leading to potentially unsafe pedestrian conditions on the road. To remedy this, the site can accommodate a footpath to serve new dwellings on the site and the existing dwellings along Hare Road, thereby providing an important community benefit. Moreover, our client is willing to provide land to facilitate the delivery of a footpath

extension on Water Lane, to achieve a long-standing Community Aspiration CA2 within the Neighbourhood Plan (see Appendix 1);

- Delivery of a range of traffic calming measures, to reinforce the 20mph speed limit through the village, and realignment of Hare Road/Church Road junction to deliver compliant visibility splays;
- Payment of CIL contribution, 25% of which will be directed to Plumstead Parish Council, to assist in delivering the aspirations contained within the Neighbourhood Plan; and

### **‘Small Sites’ Contribution**

GNLP0420R covers a site area of approximately 0.871ha. This site area is reflected within the emerging development proposals for the site. Moreover, the site can accommodate residential development of between 10-15 dwellings.

The site therefore meets the required criterion for small sites, which the GNLP team are endeavouring to allocate across the South Norfolk and Broadland Village Clusters. The NPPF requires Local Plans to accommodate, through the development plan and brownfield registers, at least 10% of their housing requirement on sites no larger than one hectare (Paragraph 68). This has been implemented to encourage small-scale housebuilders, who can build out sites relatively quickly, and provide more flexibility and choice in the market place.

Land at Hare Road comprises a site of less than one hectare in size (0.871 ha), which can be delivered quickly to achieve appropriate and proportionate growth in terms of Great Plumstead’s local context. This site would be taken forward by a small-scale housebuilder, and significant weight should be apportioned to its compliance with the NPPF in this respect.

The site could either form a discrete site allocation, or form part of a settlement boundary extension to Great Plumstead.

As discussed previously, Great Plumstead is recognised within the draft GNLP as a suitable location for growth, and the rationale for excluding further growth within the village to 2038 is unclear. The following section will demonstrate that there are no site-specific constraints which would preclude the delivery of the site in the Plan period to 2038.

### **Site-Specific Constraints**

As discussed within previous Representations, the site received a preliminary assessment of its suitability for residential development in October 2018 HELAA Addendum. All criterion received a Green rating, with the exception of Access, Accessibility to Services, Utilities Capacity and Transport and Roads, which received an Amber rating, indicating that the constraints can be addressed through a development proposal. The HELAA Addendum recognised that, while the availability of utilities remains unclear, there is no reason to consider these insurmountable. However, matters concerning access and drainage have been raised by statutory consultees and local residents, as part of the live planning application for the site. The below summary seeks to address these elements:

#### Access & Suitability of Hare Road

The key elements of the NCC Highways objection to planning application ref: 20191938 are addressed below:

NCC HIGHWAYS CONCERN	RESPONSE
Width of Hare Road – NCC Highways contend that Hare Road varies between 4.7 and 5.1 metres wide.	The development of the site will not reduce the carriageway, and provides an opportunity to expand it if necessary. The delivery of a 1.8m footpath on the side of the development, built to Norfolk County Council adoptable standards can be provided within our client’s ownership. This will significantly increase pedestrian safety and connectivity for new and existing residents, in line with the objectives of the Neighbourhood Plan.
Concerns that the required visibility splays (43m x 2.4m x 43m) could not be achieved.	The removal of the tree belt to the frontage of Church Road, as part of the residential development currently under construction, will remove visual obstructions from the Hare Road junction.  As demonstrated within the approved site layout for this development (Appendix 2), it is apparent that visibility splays in

NCC HIGHWAYS CONCERN	RESPONSE
	<p>excess of those required by Manual for Streets can be achieved at this junction to the west (4.5m x 90m from the centre of Hare Road junction) to facilitate the development of GNL0420R.</p> <p>A Highways Statement, prepared by Pritchard Civil Infrastructure Design, is being submitted to support planning application ref: 20191938. This Statement, informed by a Road Safety Audit of the Hare Road/Church Road junction, presents two viable options to deliver the improvements necessary to facilitate compliant visibility splays to the east.</p>
<p>Highway safety concerns at the Hare Road junction - two Personal Injury Accidents have occurred in the vicinity of the junction within the last five years, one slight and one serious.</p>	<p>The Highways Statement, prepared by Pritchard Civil Infrastructure Design, contains a review of the Personal Injury Accidents at the junction, and concludes that there are no highways safety concerns which would preclude residential development in this location.</p> <p>The live development proposals at the site seek to deliver a range of traffic calming measures, to reinforce the 20mph speed limit through the village, and realignment of Hare Road/Church Road junction to deliver compliant visibility splays.</p>
<p>Increase in traffic generation</p>	<p>The Highways Statement, prepared by Pritchard Civil Infrastructure Design, demonstrates that the local road network is capable of accommodating the increase in traffic movements arising from the delivery of GNL0420R.</p> <p>Moreover, it is understood that, since delivery of the NDR, Hare Road now accommodates considerably less traffic than before.</p>

From this, it is apparent that the access issues raised by NCC Highways in relation to the proposed development site can be addressed through delivery of development on the site.

### Drainage

Representations have been submitted in response to planning application ref: 20191938 concerning surface water flooding on Hare Road. Firstly, the site, and Hare Road, is not recognised by the Environment Agency as being located within an area of surface water flooding. This is reflected in the HELAA Assessment of the site, which attributes a 'Green' rating to the site in terms of Flood Risk.

Secondly, the emerging development proposals for the site can facilitate the delivery of a robust surface water drainage strategy, to prevent any increase in flood risk off-site. Prior to commencement of the development under construction at Church Road, there was a surface water drainage issue on the corner of Church Road and Water Lane. However, through implementation of planning application ref: 20161151, this has been eradicated through replacement of the highway surface water drains along the entire length of the site within the newly constructed footpath. It is envisaged that a similar enhancement can be achieved at Hare Road, through implementation of a drainage strategy associated with the development of GNL0420.

From this, it is apparent that the drainage issues raised in response to planning application ref: 20191938 can be addressed through delivery of development on the site.

### ***Deliverability and Proposed Housing Trajectory***

The emerging development proposals for the site are being brought forward by Ingram Homes, a renowned local housebuilder with proven track record of housing delivery in Great Plumstead, as evidenced by the ongoing construction of land to the south of GNL0420R.

GNLP0420R comprises a site of less than one hectare in size (0.871ha), which can be delivered quickly to achieve appropriate and proportionate growth in terms of Great Plumstead's local context. Significant weight should be apportioned to its compliance with the NPPF in this respect.

#### ***Available***

The site is within the ownership of Mr Derek Jones, who has instructed Bidwells to submit this representation on his behalf. The site is not restricted by any leases or restrictive covenants. The site is therefore readily available for development.

#### ***Achievable***

Based on the suitability assessment above, there are no site-specific constraints which could threaten the delivery of residential development on the site.

#### ***Viable***

We are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site.

## **Summary**

As demonstrated above, the site is suitable, available, achievable and viable, and is therefore deliverable and developable, in line with the NPPF. The site represents an appropriate and proportionate extension to Great Plumstead, and its allocation would ensure the delivery of an appropriate quantum of new housing in this highly sustainable location. As discussed, Ingram Homes' progress in the preparation of a planning application for the site is testament to the deliverability of the site within the Plan period.

This Representation is submitted in response to the requirement for the GNLP to allocate more small sites within Village Clusters across South Norfolk and Broadland. Site GNLP0420R meets the parameters of a 'small site', set by the GNLP team, and represents a logical and proportionate extension to Great Plumstead in the Plan period to 2038.

This is particularly relevant given that no alternative sites are identified in Great and Little Plumstead as being suitable for development. Accordingly, this Representation demonstrates that this specific site is a suitable location for further development, and should be allocated for residential development in the Plan period to 2038.

# APPENDIX 1

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**COMMUNITY ASPIRATIONAL POLICY 2**  
**Footpath Improvement**

**Improvement of the footpath as it enters Great Plumstead from Water Lane by:**

- 1) widening the existing footpath to the same width as the rest of the footpath; and
- 2) continue the cycleway, linked to the footpath, to match the remainder of the cycleway on Water Lane.

Contributes and supports Spatial Planning Objectives 1, 3, 6, 7, 9, 10 and 11 and Neighbourhood Plan Objectives 2 and 4.

**Justification and Evidence**

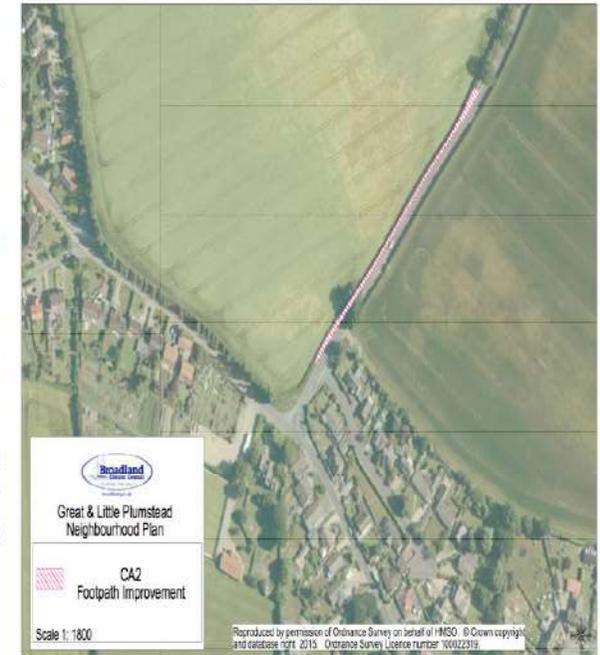
The installation of the footpath and cycleway between Great Plumstead and Little Plumstead has been very successful, with the local communities making good use of the facility.

Concern has, though, been raised by the local community at the narrowing of the footpath and the loss of the cycleway on the last stretch of the pathway.

The fear expressed by local residents is that vehicles using Water Lane may accidentally mount the narrow path or the wing mirrors of larger vehicles may hit pedestrians walking on the pathway. Whilst thankfully this has not happened, the fear exists.

With parents stating that they will not allow their children on this stretch of pathway on their own due to the perceived danger.

While the Parish Council will lead on this improvement, other stakeholders, including the local landowner and Highways Authority, will have a part to play. The Parish is expected to be able to source CIL funding to contribute to overall costs, in order to deliver to for the local community the benefit of a safer and better linkage between Great and Little Plumstead.



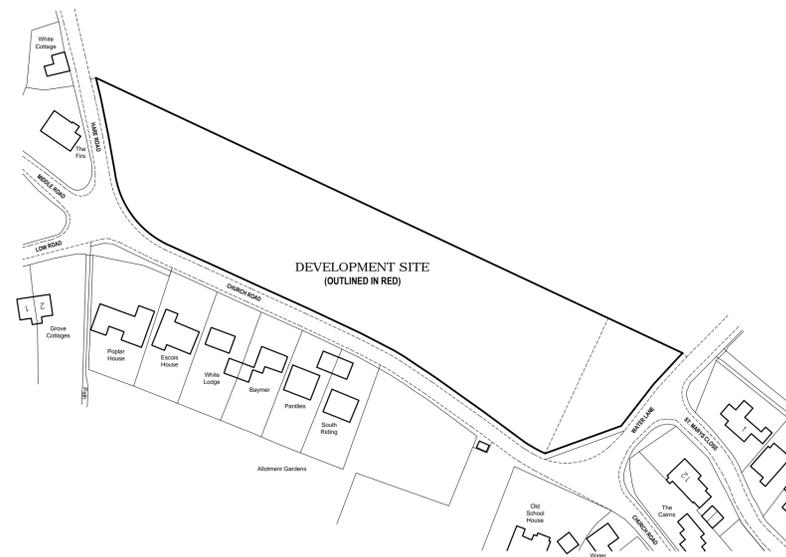
**Community Feedback**

Consultation on the emerging Neighbourhood Plan revealed the following key issues in relation to this topic that the policy seeks to address:

- Footpath link between Little & Great Plumstead to be made safer by moving narrow section behind hedge - 90% agreed.

# APPENDIX 2

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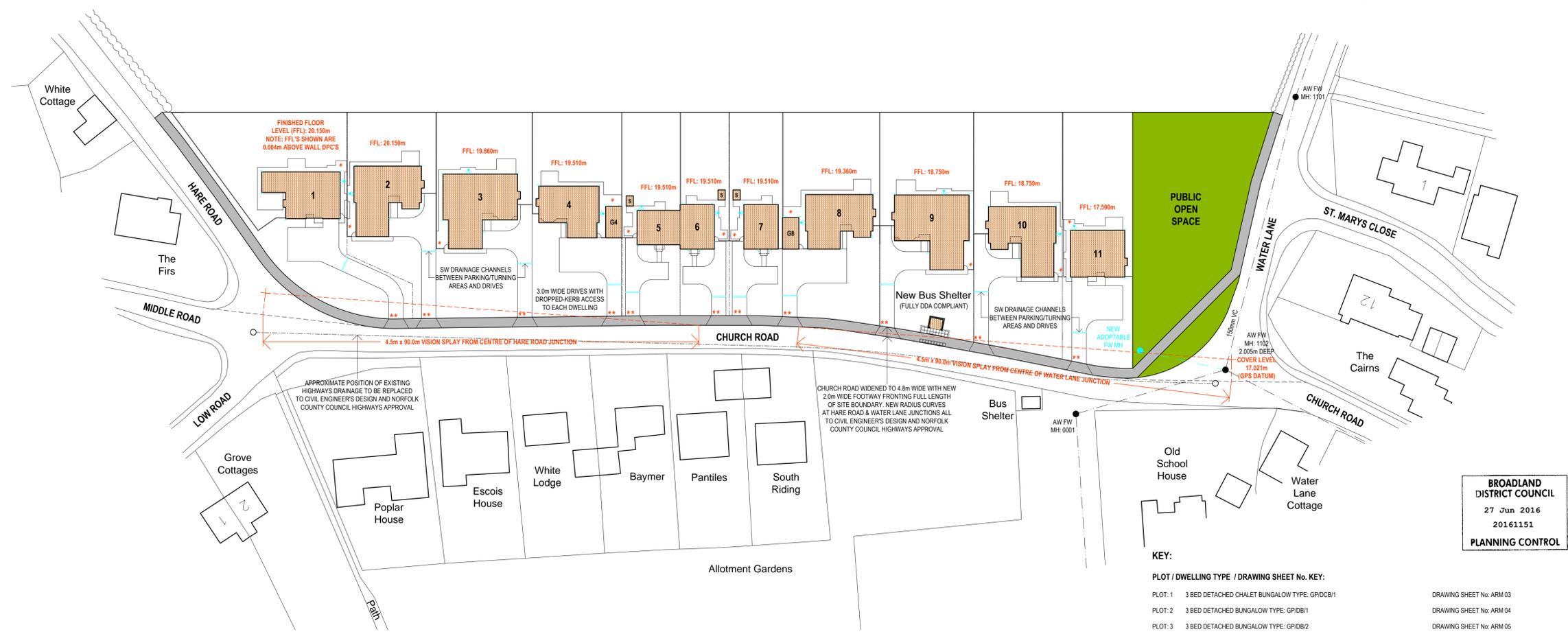


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LOCATION PLAN 1: 1250



# Great Plumstead



SITE PLAN 1: 500



THIS DRAWING SUPERSEDES DRAWING No: 2987.0914.B - SHEET 1 - REVISION 'A' APPROVED AT OUTLINE PLANNING STAGE UNDER BROADLAND DISTRICT COUNCIL PLANNING REFERENCE: 20151517

- General Notes:**
- This drawing must not be scaled and if in doubt ask.
  - All Contractors are to check all dimensions & levels on site prior to commencing any construction or fabrication.
  - This drawing to be checked and read in conjunction with all Engineers, Architectural, Service Engineers and any specialist drawings, together with any relevant additional Engineers specifications.
  - Where site information or adjoining building details are contrary to issued details then the Engineer is to be informed immediately.
  - No structural members are to be cut, notched, or jointed unless shown on the Engineers details. Unless otherwise noted all connections of structural members including laps & anchorages of reinforcement shall be capable of mobilising the full structural capacity of the member.
  - All bolt connections to have a minimum of 2 bolts.
  - The foundations have been designed on allowable ground pressure of 100 KN/m<sup>2</sup> & this must be confirmed on site before casting of foundations. Unless informed to the contrary in writing it has been assumed that the sub-soil is not a clay soil that has been desiccated by trees & vegetation and that there is no possibility of heave or shrinkage.
  - Under the provisions of the Party Wall etc Act 1996 if the excavations are within 3m of adjacent buildings written agreement for the works from the owner & the tenant (if applicable) of adjacent buildings must be obtained before building works commence & one month's notice must be given before building works commence. If the work applies to the party wall two months' notice must be given. Note: If foundations are deeper than normal a further notice may have to be given & agreement received. Note: If foundations, soffits, gutters, etc encroach across the boundary, a written agreement from the owner of the adjoining land / buildings must be obtained & the boundary agreed before building works commence.
  - The Construction (Design & Management) Regulations 2015. The client must make suitable arrangements for managing the project, including the allocation of sufficient time and resources.
  - The construction work can be carried out (so far as reasonably practicable) without risks to the health and safety of any person affected by the project.
  - Ensure suitable welfare facilities are provided.
  - These arrangements must be reviewed and maintained throughout the project.
  - The client must provide pre-construction information to the designer and contractor.
  - The client must ensure that a construction phase plan is in place before the construction phase starts.
  - The client must ensure that the principal designer prepares a health and safety file for the project which is suitable, regularly updated and is available for inspection.
  - The client must take reasonable steps to ensure that the principal designer and contractor complies with their duties.
  - The client must pass the health and safety file to any new owner(s)/occupier(s) and ensures that the new owner(s)/occupier(s) is aware of the nature and purpose of the file.
  - The design shown on this drawing and any associated drawing is the Copyright of Building Plans Ltd and may not be reproduced or used for any purpose whatsoever without their written consent.

DRAWING PREPARED TO SUPPORT AN 'APPROVAL OF RESERVED MATTERS PLANNING APPLICATION' TO DISCHARGE THE RELEVANT CONDITIONS APPLIED TO 'OUTLINE PLANNING PERMISSION' GRANTED UNDER BROADLAND DISTRICT COUNCIL PLANNING REFERENCE: 20151517

**Revisions:**

Rev:	Date:	Amendment:	Drawn:
A	25th Apr 2016	<ol style="list-style-type: none"> <li>Rain Water Pipe (RWP) Positions to Dwellings and Bus Shelter added for Surface Water Drainage Scheme Design by Civil Engineer's</li> <li>Drainage Channels between Individual Drives and Parking &amp; Turning Areas added following Norfolk County Council Highways Consultations</li> <li>Approximate Position of Existing Highways Surface Water Drainage Pipe To Be Replaced in Church Road added.</li> <li>Finished Floor Levels to GPS Datum added</li> <li>Anglian Water Mains Water Entry Point to Each Dwelling added</li> </ol>	JN

BROADLAND DISTRICT COUNCIL  
27 Jun 2016  
20161151  
PLANNING CONTROL

**KEY:**

**PLOT / DWELLING TYPE / DRAWING SHEET No. KEY:**

PLOT.1	3 BED DETACHED CHALET BUNGALOW TYPE: GPDCB1	DRAWING SHEET No: ARM 03
PLOT.2	3 BED DETACHED BUNGALOW TYPE: GPDB1	DRAWING SHEET No: ARM 04
PLOT.3	3 BED DETACHED BUNGALOW TYPE: GPDB2	DRAWING SHEET No: ARM 05
PLOT.4	2 BED DETACHED BUNGALOW TYPE: GPDB3	DRAWING SHEET No: ARM 06
PLOT.5	1 BED SEMI-DETACHED BUNGALOW TYPE: GPDB4A (AFFORDABLE HOUSING)	DRAWING SHEET No: ARM 07
PLOT.6	1 BED SEMI-DETACHED BUNGALOW TYPE: GPDB4B (AFFORDABLE HOUSING)	DRAWING SHEET No: ARM 07
PLOT.7	1 BED DETACHED BUNGALOW TYPE: GPDB5 (AFFORDABLE HOUSING)	DRAWING SHEET No: ARM 08
PLOT.8	3 BED DETACHED BUNGALOW TYPE: GPDB6	DRAWING SHEET No: ARM 09
PLOT.9	3 BED DETACHED BUNGALOW TYPE: GPDB2 (HANDED)	DRAWING SHEET No: ARM 10
PLOT.10	3 BED DETACHED BUNGALOW TYPE: GPDB1 (HANDED)	DRAWING SHEET No: ARM 11
PLOT.11	3 BED DETACHED CHALET BUNGALOW TYPE: GPDCB2	DRAWING SHEET No: ARM 12
	BUS SHELTER	DRAWING SHEET No: ARM 13

- REFUSE BIN STORAGE AREAS & COLLECTION POINTS KEY:**
- \* BIN STORAGE AREAS FOR EACH DWELLING - SEE INDIVIDUAL DWELLING DRAWING SHEETS
  - \*\* BIN COLLECTION POINT FOR EACH DWELLING (COLLECTION ON BDC SCHEDULED DAY)
  - DENOTES AW MAINS WATER ENTRY POINT TO EACH DWELLING

Client: **Ingram Homes**

Project: **RESIDENTIAL DEVELOPMENT**

Site Address: **LAND NORTH EAST OF: CHURCH ROAD, GREAT PLUMSTEAD, NORWICH, NORFOLK.**

Drawing Title: **SITE & LOCATION PLANS**

Scale @ A1: 1:500 + 1:1250	Date: JULY 2015
Drawn by: JN	Revision: A
Project No: 2987.0914.B	Sheet No: ARM 01