

# GNLP – REGULATION 18(C) CONSULTATION RESPONSE GNLP2143 – MARSHAM

On behalf of Mr Graham Payne and family, we strongly support the preferred allocation of GNLP2143, land south of Le Neve Road, Marsham. The site is entirely deliverable, and capable of making a valuable contribution towards satisfying the Councils' housing needs during the period to 2038.

GNLP2143 has been identified as a preferred allocation for 25-35 dwellings, of which 33% will be affordable. It is recognised in the draft policy that more homes may be accommodated on the site, subject to an acceptable design and layout, as well as infrastructure constraints. The preferred allocation recognises that development is expected to provide access (vehicular and pedestrian) from Le Neve Road, an extension (0.27ha) to the existing cemetery, a design and layout which minimises adverse effects on nearby heritage assets, namely the church to the east, and to safeguard the existing Public Right of Way (PRoW) to the south-east boundary.

In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable. This is considered in further detail below.

## **Assessment of Delivery**

#### Suitable

Marsham is identified as an 'Other Village' in the Joint Core Strategy for Broadland, Norwich and South Norfolk, recognising its suitability as a location for small scale residential development. Marsham is designated as a 'Village Cluster' in the draft GNLP, due to a primary school, which has spare capacity, alongside a village hall and pub. Village Clusters are locations that are allocated for small scale growth. They are locations that, due to the scale of development envisaged, will support small scale builders and provide choice for the market. As a result, growth of 50-60 dwellings is allocated to Marsham in the GNLP (There are no Reasonable Alternative sites identified; only this site has been identified). Accordingly, the scale of growth considered appropriate for Marsham is greater than that covered by draft Policy GNLP2143.

Given the suitability of Marsham, the allocation of the site will help achieve the GNLP's aspirations of focusing growth in village locations to promote social sustainability by supporting rural life and services. It will help support the GNLP's aspiration of achieving 9% of total housing growth in the GNLP in Village Clusters (480 dwellings in Broadland).

The following commentary demonstrates the suitability of the site having regard to key technical matters, whilst responding to the points raised in the preferred allocation's wording.

## Density and Quantum of Development

The preferred allocation identifies the site as being suitable to accommodate 25-35 homes. However, the preferred allocation also suggests that more homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints being addressed.

Based on the upper limit of the preferred site allocation (35 dwellings) and the identified site area of 1.97 ha, the density of development equates to 18 dwellings per hectare. If land is made available for a 0.27ha extension to the cemetery, the density of development (for 35 dwellings) will equate to 21 dwellings per hectare. However, this density is lower than the indicative minimum densities set out in Policy 2 of the draft GNLP, which seeks a minimum of 25 dwellings per hectare to make efficient use of land (subject to site specific constraints).

Accordingly, it is evident that the site can accommodate at least 35 dwellings, as envisaged by draft Policy GNLP2143, together with other policy requirements, notably the provision of an extension to the cemetery.

### Layout and Design

An Indicative Masterplan prepared for the site, by Ingleton Wood, was submitted as part of the Regulation 18 (a) consultation. The masterplan demonstrated how, potentially, land to the east of the site and immediately adjacent to the existing cemetery could, in accordance with the requirements of the draft policy, be used for a cemetery extension of approximately 0.27ha.

Furthermore, the development has been designed around the existing PRoW, with the extension to the existing cemetery allocated to this area of the site. The area designated for the extended cemetery is also designed to mitigate any visual impact to on the nearby heritage assets. A landscape strategy to minimise the visual impact of the proposal will be prepared to inform a planning application.

Overall, the Indicative Masterplan demonstrates how a high quality layout and design can be comfortably achieved on the site, based on the site area and provision of up to 35 dwellings, whilst considering the sites constraints and policy requirements.

### Access, Transport and Roads

An Access Appraisal has been prepared by Orari Development Transport Planning and is submitted as part of this representation. The policy requires that vehicular and pedestrian access will be provided from Le Neve Road. As detailed above, the policy also requires the safeguarding of an existing PROW from the south east corner of the site.

With regards to the vehicular and pedestrian access to Le Neve Road, there are no traffic generation and highway safety issues to preclude the provision of a residential development of up to 35 dwellings. In order to accommodate the proposed access to the site, it is necessary to include a junction with the existing Croft Lane.

With regards to the safeguarding the PRoW, the alignment extends in a south-westerly direction across the Appraisal Site, which will need to be incorporated within the design and layout of the residential development. In order to accommodate the PRoW, the design and layout has designated the eastern section of the site as the graveyard extension, so that it is safeguarded from the residential development.

The Access Note confirms that the bus services within Marsham meet Norfolk County Council's requirements in terms of public transport availability and frequency.

In terms of trip generation, the work undertaken by Orari Development Transport Planning concludes that additional residential vehicle movements are unlikely to have any measurable impact upon traffic flows on Le Neve Road and the local Marsham highway network during peak AM and PM peak periods. Utilising the TRICS data base, it is concluded that based on 35 dwellings, there will be 5 arrivals and 12 departures during the AM peak, and 13 arrivals and 5 departures in the PM peak.

The Access Note concludes that in terms of vehicular access, accessibility to services and other modes of transport, the site meets all the necessary criteria. Whilst the development will create an additional quantum of vehicle trips on the local highway network, through the provision of satisfactory pedestrian facilities to the village, traffic generation will be mitigated further.

#### Available

The land is, in its entirety, owned by Graham Payne and family, and is available for development immediately. Graham also owns land immediately to the south and west of the proposed allocation which, if required, is available for development.

The landowner is working with Bidwells and Lovell Partnerships Limited (Lovell) to promote the site for allocation.

#### Achievable

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

Lovell have identified this site as being suitable for development within the next five years. Lovell are actively developing within the District and are very familiar with the local housing market. Lovell are confident of a successful housing scheme in this location.

#### 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. This statement is, however, made in the context of the questions that have been raised in relation to ongoing preparation of the Greater Norwich Local Plan Interim Viability Study (2019) and the review of the Community Infrastructure Levy. Further discussions are required with the GNLP Team on these matters in order to confirm that the various policy objectives, such as affordable housing and community infrastructure, can be delivered on site without prejudicing the viability of the site. Lovell are keen to continue discussions with the GNLP Team on this matter as soon as possible.

## **Summary**

The cluster of Marsham is a sustainable location for growth, benefitting from a range of services and amenities, including a primary school, village hall, local pub and public transport provision.

As has been demonstrated, the site is suitable, available, achievable and viable, and is deliverable within the first five years of the plan period. As previously recognised, there are no constraints which would affect the suitability of the site for residential development. This is particularly relevant given that no alternative sites are identified in Marsham as being suitable for development. Accordingly, the foregoing text demonstrates that this specific site is a suitable location for further development, and Graham Payne and family supports the GNLP's proposals to allocate the site under Policy GNLP2143 for residential development.

In terms of the three strands of sustainable development, economically, the site represents the right land in the right place at the right time. Residential development will help support the planned long-term economic growth of the Greater Norwich Area, whilst sustaining rural life and services.

Socially, the scale of development envisaged is such that it will enable the creation of a strong, vibrant and healthy community, with easy access to existing and planned local services and facilities. A mix of dwelling types, sizes and tenures will be provided to meet local needs. In addition, the development will provide a cemetery to meet local need.

Environmentally, the layout of the scheme can be designed to ensure it has no impact on heritage assets. In addition, the site is acceptable in highway terms and will not have an adverse impact on the highway network.