

GNLP – REGULATION 18(C) CONSULTATION RESPONSE REP 1 – BROOMHILL LANE, REEPHAM

Introduction

On behalf of Lovell Partnerships Limited (Lovell), Reepham High School and the landowner (Robert & Rita Buxton), we strongly support carrying forward the existing allocation of REP1, Land off Broomhill Lane, Reepham, subject to various amendments. The site is, subject to the changes sought, entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2038.

Lovell are in the process of preparing a full planning application for 141 dwellings, alongside a cemetery extension and sports hall for Reepham High School. The intention is to submit the full application in March 2020.

Through ongoing discussions with Reepham High School, the application seeks consent for the sports hall on the existing sports pitches, to the south of Reepham High School and outside the red line of the allocation, to ensure the sports all is located in the most operationally efficient location. It will also, by allowing the development of more residential units within the boundary of the allocation, subsidise, in part, the development of the Sports Hall. As part of the proposed development, land totalling 0.3 ha is provided for an extension to Reepham Cemetery, in the north-eastern corner of the site.

This representation seeks amendments to draft Policy REP1 to reflect the planning application being prepared by Lovell and the landowner.

Reepham

Reepham is identified in both the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) (2011) and the draft GNLP, as a Key Service Centre, as it provides a location which has a good range of services and amenities to support day to day life whilst also providing access to public transport and employment opportunities. These services include a primary school, high school, doctor's surgery, dentist, SPAR, alongside a range of shops, places to eat and drink, and employment opportunities. Given that REP1 and REP2 have not been developed, the draft GNLP seeks to carry both allocations forward, which will provide a total of 142 homes, and does not propose any new allocations. Accordingly, Reepham is a suitable location for growth.

Given the suitability of Reepham, carrying forward the site's existing allocation will help achieve the GNLP's aspirations of focusing growth in locations with access to jobs and services, whilst supporting a vibrant rural economy. Therefore, the site will help support achieving 8% of total housing growth in the GNLP in Key Service Centres (2,902 existing commitments and 515 new allocations).

Existing Allocation

The site is currently allocated under Policy REP1 of the Adopted Development Plan. Policy REP1 allocates the site for residential development and community facilities (including cemetery land, recreational open space and a Sports Hall), alongside 100 – 120 dwellings. Furthermore, the following guidelines for development are included in REP1: need for a Transport Assessment; realignment and improvement work to Broomhill Lane; off-site highway works, where necessary; adequate landscaping and GI; SuDS

provided; mix of housing sizes and types; provision of sports hall in close proximity to the High School; and, provision of extension to the cemetery.

Amendments to draft REP1

Despite the site's current allocation, no development has yet come forward on the site. This is, in part, due to the fact that, from an operational perspective, locating the Sports Hall on the site emerged as being impractical for Reepham High School's daily operations. Consequently, ongoing discussions have been held over the past years regarding bringing development forward on the site which is optimal for all parties involved.

Through these discussions, it emerged that Reepham High School were eager to pursue the provision of a sports hall to the south of the school, on part of the existing sports pitches, which are surplus to requirements. From an operational point of view, this location is in much closer proximity to the school's existing facilities, enabling the sports hall to be run in an operationally efficient manner. This will ensure that the sports hall is adjacent to the principal sports pitches at the school, assisting in timetabling and student access, alongside ensuring that classroom based teaching is adjacent to the sports pitch provision.

In addition to the above, the location of the sports hall to the south of the existing school enables access to be easily achieved from the school's existing car park, which both avoids the requirement for large areas of hardstanding to be created, and allows for community use of the sports hall outside of school hours. More specifically, locating the sports hall to the south of the school will enable use of the sports hall by the local community, without creating any safeguarding or security issue within the school ground.

In addition, as detailed above, the relocation of the sports hall will allow the development of more residential units within the boundary of the existing allocation. The increased number of residential units will, in part, help subsidise the development of the sports hall.

Whilst the existing allocation has yet come forward, Lovell and Reepham High School have worked collaboratively to secure a solution, which enables the site allocation to come forward whilst also being beneficial to all parties involved.

On this basis, the following amendments are required to the draft policy:

Red Line Boundary

Given the desire to locate the sports hall on land to the south of Reepham High School, it is sought to amend the red line of REP1 as part of this Representation. The Site Boundaries Plan represents the revised red line boundary. This results in the site area being 8.71 ha.

Density and Quantum

Through ongoing discussions, the application seeks consent for the sports hall on the existing sports pitches, to the south of Reepham High School. This unlocks additional land within REP1 to accommodate additional residential development. As detailed by the planning application that is due to be submitted imminently, 141 dwellings can be accommodated on the site (21 additional dwellings in excess of REP1).

Based on 141 dwellings, and a revised site area of REP1 (8.71 ha), the density of the development equates to 17 dwellings per hectare. Whilst 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), the density does include the land for a cemetery, Broomhill Lane, and public open space provision. Accordingly, in this instance, excluding the cemetery and land for a sports hall, the density equates to 19 dwellings per hectare.

Revised Policy Wording

POLICY REP1 Land off Broomhill Lane, Reepham (approx. 8.271 ha) is allocated for residential development & community facilities (including cemetery land, recreational open space and a sports hall). This comprises land to the north (approx. 57.77 ha) and south (approx. 2.5-0.94 ha) off Broomhill Lane, Reepham and land to the south of Reepham High School. The site will accommodate at least ~~100~~ 140 homes in total.

More homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints. The development will be expected to address the following specific matters:

- Vehicular access to be from a realigned and improved Broomhill Lane, incorporating appropriate traffic management measures and footway provision, with pedestrian access linking to Park Lane and Broomhill Lane.
- Off-site improvements to the highway network may also be necessary, as required by the highway authority, potentially including extension of the 30mph speed limit on Whitwell Road and consideration of extending the 20mph speed limit to the High School.
- Provision of a sports hall for the High School to be located in proximity to the existing school facilities.
- Provision to be made for an extension of the existing town cemetery.
- Norfolk Mineral and Waste Core Strategy Policy CS16 applies as this site is underlain by safeguarded mineral resources.

Key

Amendment – Proposed Amendments

~~Deleted~~ – Proposed Text to be Removed

Other Matters

The increase in the number of units to 140 and revision to the site boundary has the potential to give rise to additional impacts in relation to highways. On this basis, a Transport Assessment has been prepared by Rossi Long and is submitted in support of this representation.

The Assessment recognises that, through pre-application discussions with Norfolk County Council Highways, it has been agreed that the 4m grass verge along Broomhill Lane could be utilised to widen Broomhill Lane. As a result, it was agreed that Broomhill Lane could be widened to a suitable width to accord with design guidelines for the quantum of traffic predicted. Broomhill Lane would be widened to a minimum width of 4.8m, with a 3m shared-use foot/cycle way on the southern side. The proposed realignment and improvement works to Broomhill Lane demonstrate how the access strategy address the requirement for realignment and improvement works to Broomhill Lane in the carried forward policy wording of REP1.

At present, visibility from Broomhill Lane onto Whitwell Road to the north is limited. Accordingly, Lovell purchased the bungalow on the corner between Broomhill Lane and Whitwell Road, in order to achieve suitable visibility splays. This is achieved through reducing the size of the front garden of the property. As a result, 2.4m x 55m visibility splays are possible to both the north and south of Whitwell Road. This will be an improvement for current residents who live on Broomhill Lane.

A raised pedestrian crossing is proposed at the junction with Whitwell Road, to facilitate pedestrian crossing of Broomhill Lane. Vehicular crossovers will be provided to facilitate access to all existing dwellings on Broomhill Lane.

A 20mph speed limit would be introduced on Broomhill Lane and Whitwell Road, in the vicinity of the Broomhill Lane junction. This demonstrates how the requirement for speed considerations, as detailed in the proposed wording of REP1, have been considered and can be achieved as part of development on the site.

The Assessment concludes that the existing and proposed infrastructure is suitable to facilitate travel to and from the site for people on foot or by cycle. Multiple bus stops are available in the Market Place, providing frequent services to places such as Aylsham and Norwich, Monday to Saturday.

With regards to trip generation, the Assessment concludes that in the AM peak there will be 18 arrivals and 49 departures, and in the PM peak, 45 arrivals and 24 departures. As a result, it is concluded that the impact of the proposed development on the surrounding highway network is likely to be relatively small, with approximately 1 additional vehicular trip to or from the proposed development site every minute during the peak hours. The location of the site and the site access arrangements means that the quantum of trips described is unlikely to cause significant net impact on the local highway network.

In terms of highway safety, it is concluded that there are no reasons why the development proposals should significantly impact upon highway safety in the area.

Overall, the Assessment demonstrates that the proposed development complies with local and national policy, and that there should not be any highway or transportation reasons as to why the proposed allocation cannot be increased to at least 140 units.

Suitable

As has been recognised above, Reepham constitutes a suitable location for growth. Development on REP1 will help to achieve the GNLP's aspirations of focusing growth in village locations to promote social sustainability by supporting rural life and services. The increase in the number of units from 120 (as identified in the adopted Development Plan) to 141 is minimal and can be supported by the range of services and amenities available in Reepham and which result in it being identified as a Key Service Centre. Therefore, the site will contribute to the delivery of at least 8% of total housing growth in the GNLP in Key Service Centres.

Deliverability and Proposed Housing Trajectory

The following Housing Trajectory has been based on robust local evidence, including the completion of a range of similar scale developments across the District by Lovell, and reflects the planning application that is due to be submitted shortly. Lovell are committed to delivering housing within Broadland. We have developed sites across Broadland, including within Reepham historically. Lovell have also recently secured planning consents on sites in Newton St Faith and Rackheath and look forward to continuing to deliver much needed housing across the District.

Based on the submission of a planning application in 2020 and a determination of the application in late 2020 / early 2021, it is hoped that development can commence on the site in 2021. Assuming delivery of 35 units per annum, the development would be complete by 2025; well within the first five years of the Local Plan period.

| | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2035 | 2036 | 2037 | 2038 |
|-------------------------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|
| Units | 0 | 35 | 35 | 35 | 36 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Cumulative Total | 0 | 35 | 70 | 105 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 |

Available

Lovell Homes have a conditional contract on the site.

Part of the land is leased to the school on a temporary basis, and can be terminated with the agreed notice period at any time. The remainder forms part of the landowner's estate.

It is anticipated that development on the site would be both available and developable in 1 to 5 years.

Achievable

Based on the suitability assessment above, there are no site-specific constraints which could threaten the delivery of residential development, a sports hall and cemetery extension. Therefore, residential development on the site is deemed to be entirely achievable.

Lovell have a strong reputation for delivering housing within Broadland. Lovell East Anglia is based at Broadland Business Park and employs around 130 people across Norfolk, Suffolk, Cambridgeshire and Essex. Lovell have 10 developments currently on site, representing a mix between their contracting and development businesses, and in 2019 completed circa 450 dwellings. Lovell are committed to delivering this development within the next 5 years.

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.

However, this statement is made on the basis that the scheme provides 20% affordable housing. A Viability Assessment prepared to support the planning application referred to above, demonstrates that in order to subsidise the delivery of the sports hall, it is not viable to provide more than 20% affordable housing.

Summary

Reepham is a sustainable location for growth, benefitting from existing facilities, such as a primary and high school, doctor's surgery, dentist, SPAR, alongside a range of shops, places to eat and drink, employment opportunities, 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 the proposed development of at least 140 dwellings, cemetery extension and sports hall.

Accordingly, the foregoing text demonstrates the suitability of carrying REP1 forward, alongside amending REP1 to reflect the increased quantum of development and revised location of the sports hall. Therefore, this specific site is a suitable location for further development, and Lovell Homes supports the GNLP's proposals to carry forward the existing allocation of REP1.

