

**Proposed residential development at land at 151  
Taverham Road, Taverham**

**Response to Regulation 19 Consultation of the  
Greater Norwich Local Plan**

**on behalf of Mr P. Roberts**  
Our Ref: 033496

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## 1. Introduction

**1.1** Brown & Co are instructed by Mr P. Roberts to respond to the pre-submission draft Greater Norwich Local Plan (hereinafter 'GNLP') that is currently at its Regulation 19 consultation stage.

**1.2** Representations to the Regulation 19 version of the GNLP should consider whether the Plan has been appropriately prepared in accordance with all relevant procedural and legal requirements, and whether it meets the tests of soundness as set out within paragraph 35 of the National Planning Policy Framework (hereinafter 'NPPF').

**1.3** It is considered that the draft Plan is unsound, as the strategy proposed is neither justified nor effective. It is thought that site GNLP4040 offers an appropriate opportunity to focus development in a highly sustainable location, which would further the aims of local and national policies to move towards a low-carbon future and to create beautiful places and spaces.

## 2. Objection to proposed strategy.

### Justified

**2.1** The NPPF indicates that to be justified a Plan should set an appropriate strategy based on robust and credible evidence, with suitable consideration given to reasonable alternatives. It is considered that the proposed strategy is not appropriate as it fails to provide sufficient flexibility and variation in sites within the urban area, particularly the fringe parishes.

**2.2** The Plan states that the urban area of Norwich and the surrounding fringe parishes will be the focus for growth, with 66% of planned growth occurring in this area. Paragraph 188(f) of the draft Plan states that a significant number of medium and small scale sites are allocated within the urban area "*providing a balanced range of site types to allow for choice, assist delivery and allow smaller scale developers and builders into the market*". Whilst draft Policy 7.1 states that, in the fringe parishes provision will be made for a "*range of sites for different types of housing [...] that are accessible and integrate well with existing communities*".

**2.3** Examination of the existing allocations to be carried forward, and the proposed new allocations shows that around 46% of sites within the urban area provide for under 100 dwellings, and 39% provide for fewer than 50 dwellings. However, in the fringe parishes this falls to around 22% of existing and proposed allocations. As such there appears to be a significant reliance upon larger sites within the urban fringe areas, with small sites under 50 largely concentrated to the city centre.

**2.4** As demonstrated by the scale of large allocations proposed to be carried forward from the current Plan, such sites are often plagued by delays. The need for costly infrastructure upgrades, lengthy planning determination periods and Section 106 negotiations, the need for additional funding, and the impact of variable housing markets and economic landscape mean that many sites take significantly longer to come forward than anticipated. This is confirmed through examination of the delivery trajectories for sites contained within the current Local Plan documents and Area Action Plans for each of the constituent Councils, and the most recent trajectories contained within the Joint Core Strategy for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2018-19. That report shows many sites anticipated to provide significantly fewer houses prior to 2026 than originally planned, with some providing no housing at all.

**2.5** The NPPF, at paragraph 68, recognises that “*small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly*”. This is because they often do not have the same infrastructure requirements and are not subject to the same market control as larger sites brought forward by national housebuilders. This has been demonstrated over recent months as the economic and delivery implications of the global pandemic have resulted in additional delays to housebuilding, particularly on larger sites. It is imperative, now more than ever, that small and medium scale sites are promoted to ensure delivery early within the plan period, to help to stimulate the economy, and to support small and medium builders.

**2.6** As a focus for growth, the urban area including the fringe parishes should have sufficient flexibility to provide a range of housing to meet needs, throughout the plan period. As such there is a need to provide sufficient small and medium sites to ensure ample delivery early within the plan period. The proposed reliance upon larger sites within the urban area, and particularly the fringe parishes, creates an inherent risk of delayed delivery and conflict with the growth strategy.

**2.7** It is considered that additional smaller sites, providing fewer than 50 dwellings should be allocated within the urban fringe parishes in order to ensure flexibility and delivery early within the plan period in order to meet need in the area, in advance of other larger sites coming forward. Site GNLP4040 would provide the opportunity to deliver housing in the highly sustainable village of Taverham, with up to 25 low carbon dwellings rounding off development in the area, together with biodiversity and landscape benefits.

### **Effective**

**2.8** In order to be considered effective, the NPPF states that the proposed strategy should be deliverable over the plan period. It is proposed to meet housing need over the plan period through the allocation of new sites, however the vast majority of need is proposed to be met through the rolling forward of existing allocations totalling 75% of the overall housing figures. By definition, those sites being carried forward have failed to deliver during the previous plan period, as such they should be subject to enhanced scrutiny and robust evidence of their delivery with the new plan period required.

**2.9** It is not considered that such evidence has been sought or provided for a number of sites, and so their inclusion within the emerging plan cannot be justified. Indeed, a number of allocations proposed to be carried forward do not have a promoter or developer on board, currently support other uses, and in many instances have already been carried forward from previous Local Plan iterations. The continued reliance on such sites undermines the plan making process and places the strategy for growth at risk as a result of continued non-delivery and subsequent land supply impacts.

**2.10** Indeed, many such sites are focussed within the urban area and fringe parishes, with 49 of the 66 proposed allocations being carried forward from the current Local Plan. As a key focus for growth, those sites proposed for allocation should robustly evidence their delivery. It is noted that the current iteration of the GNLP proposes the removal of a small number of previous allocations as a result of insufficient evidence of delivery, and this is welcomed. However, it is considered that there are a number of other sites which have the same issues and should also be removed.

**2.11** In order to provide an effective strategy that would deliver the requisite housing within the plan period to meet local needs, it is considered necessary to remove a number of allocations proposed to be carried forward and to allocate additional small sites, particularly within the urban area and fringe parishes. This would help to secure the early supply and delivery of housing and prevent reliance upon larger sites late within the plan period which may inevitably stall as experienced previously.

**2.12** Site 4040 is available now and deliverable within the early years of the plan, with work undergoing to prepare and submit a planning application. The site would support the aim to focus growth with the urban area and its fringe and allow sufficient flexibility within the plan to meet needs throughout the plan period.

### **3. Additional information on GNLP4040**

**3.1** The site is located to the south of Taverham Road, a short distance to the south east of its junction with Mack's Lane. It forms 151 Taverham Road and the associated residential curtilage, and an expanse of Grade 3 arable land which extends to the south east. The site is well bound by existing mature trees and hedging, with the main built form of Taverham immediately adjacent to the north, and the River Wensum to the south west. The site is located partially within the defined settlement boundary for Taverham; however, the majority of the site is located within the open countryside.

**3.2** Three variations of the site have been submitted to the GNLP for consideration, with varying red lines and associated housing numbers proposed. Site GNLP2051 was submitted during the initial Call for Sites, initially for an unspecified number of dwellings and later indicated as being suitable for up to 10 dwellings. The other two, GNLP4039 and GNLP4040, were subsequently submitted during the Regulation 18(c) consultation and proposed three and 16 dwellings respectively. These representations concern site GNLP4040 as the larger of the three sites, with the ability to deliver enhanced biodiversity and landscape benefits in association with up to 25 dwellings.

**3.3** The site was considered to represent a reasonable alternative to delivering housing within Taverham, being viewed as infill development between Mack's Lane and the main built form of the village. However, it was subsequently rejected as it was considered that there was insufficient highways frontage to provide the required access, and that it could be intrusive within the landscape.

**3.4** Since that time the landowner has undertaken significant work to demonstrate that safe and suitable highways access could be achieved to the site from Taverham Road. This has been considered by Norfolk County Council Highways Authority, who have confirmed that subject to additional technical work safe access to the site could be achieved.

**3.5** Whilst located outside of the settlement boundary it is well related to the main built form of Taverham, and is located partially within the settlement boundary. It is well bound by existing mature hedging and trees and it is considered that additional planting to be introduced as part of any development would suitably screen the site and mitigate any adverse impacts. As such it is considered that the reasons for rejection are unfounded or can be suitably overcome and the site would form a suitable location for development within Taverham.

**3.6** The landowner is currently working to prepare and submit a planning application for the site for up to 25 high quality dwellings, the intention is for the site to provide self-build dwellings to meet local needs. It is proposed for the development to achieve net zero carbon standards, with highly energy efficient dwellings and decentralised energy generation. The low density development would provide a soft edge to the village, sensitive to the river valley setting, with swathes of open space and landscaping throughout. The provision of ponds and a community orchard would enhance the multi-functional green infrastructure network in the area; bringing landscape, biodiversity and surface water management benefits. The significant native tree planting would provide a buffer to the development, filtering views and creating a natural boundary to the village, it would also provide a woodland block cognisant with those visible throughout the river valley landscape.

**3.7** The site is well located to the services and facilities available within Taverham, connected by way of continuous footways, and is within a 20 minute walk of, amongst others:

- Taverham VC CE Junior School;
- Ghost Hill Infant School and Nursery;
- Taverham Village Hall;
- Taverham Partnership Doctors Surgery;
- Taverham Post Office;
- Bus stops and
- Tesco Superstore.

**3.8** Development of the site would therefore further the aims of current and emerging local and national planning policy, particularly the proposed amendments to the NPPF which are currently being consulted upon, to move towards a low carbon future, provide a true alternative to reliance upon private vehicles, secure biodiversity enhancements, and to create beautiful spaces and places. The proposed development of the site would conform with the policies contained within the emerging Taverham Neighbourhood Plan, particularly those seeking to secure high-quality design, protection of the River Wensum Green Corridor and important local views, and the provision of new open space. Indeed, the proposals have been informed by the comments of the local community, in particular those residents along Taverham Road, resulting in low density development and support for self-build dwellings and the diversity of design.

**3.9** The site would provide the opportunity to deliver dwellings within the early years of the plan, provide an additional small site within the urban fringe, support the growth strategy, and further support small and medium builders.

## 4. Conclusions

**4.1** The GNLP in its current form is not considered to be sound due to an over reliance on large scale sites within the urban area, particularly in the fringe parishes, which fails to provide the plan with sufficient flexibility to meet short term needs within the early years of the plan period. It is widely acknowledged that larger housing sites can be subject to delays in delivery due to lengthy planning applications, infrastructure requirements, and market forces. The NPPF recognises the role of small sites in often providing housing more quickly than large-scale development, this appears to be even more important at the current time to help support the recovery of the industry and economy from the impacts of the pandemic.

**4.2** The draft policies and associated explanatory text contained within the draft GNLP state that a “*significant*” number of small and medium sites are allocated within the urban area. Whilst 39% of sites are proposed to deliver fewer than 50 dwellings the vast majority of these are focused within Norwich, and are carried forward from the current iteration of the Local Plan having failed to be delivered often due to requiring current site operations to cease. The proposal for only 22% of sites within the urban fringe to deliver fewer than 50 dwellings is not considered suitable to deliver a “*balanced range of site types to allow for choice, assist delivery and allow smaller scale developers and builders into the market*”.

**4.3** The strategy is considered to be ineffective as there is a significant reliance upon sites which have failed to deliver during the current plan period, with some of those sites having been originally allocated in previous iterations of the Local Plan. Indeed, 75% of the proposed allocations are being carried forward from the current Local Plan, having failed to deliver houses in accordance with the expected trajectory. Continuing to roll forward sites which have failed to deliver in line with the housing trajectory places the strategy for growth at risk and undermines the Plan led approach. Insufficient evidence has been provided to demonstrate the ability of these, and other sites, to deliver within this plan period, with a number of sites having no promoter or developer on board.

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**4.4** Site GNLP4040 would provide a suitable location for additional small scale development within Taverham, to support the delivery of significant growth within the urban area and fringe parishes through a “*balanced*” range of sites. The concerns regarding safe and suitable access to the site can be addressed, as confirmed by the Highways Authority, whilst any landscape impacts could be suitably mitigated and an overall enhancement to the area achieved.

**4.5** As such site 4040 should be allocated for a high quality, low density development of up to 25 dwellings providing low carbon housing and community orchard. The commitment of the landowner to tackle climate change, provide biodiversity gains, and create beautiful places would further the aims of national planning policy, and the policies as set out within the emerging GNLP.