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## Site Reference GNLP4025 Representation

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**Date:** March 2021.

**Site:** Land North of Church Road, Reedham

**Client:** Mr Dunthorne.

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## Revision Schedule

Site Representation - GNLP4025 Land North of Church Road, Reedham

**Project Reference Number: 1805**

Rev	Date	Details	Prepared by	Reviewed by	Approved by
00	16 March 2021	Draft	<b>Heather Byrne</b> Senior Planning Consultant	<b>Debi Sherman</b> Director of Planning	<b>Debi Sherman</b> Director of Planning
01	17 March 2021	Final	<b>Heather Byrne</b> Senior Planning Consultant	<b>Debi Sherman</b> Director of Planning	<b>Debi Sherman</b> Director of Planning

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**5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

Paragraph 35 of the NPPF relates to the examination of plans and states *‘Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:*

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.’*

Reedham forms a village cluster in the emerging Greater Norwich Local Plan (GNLP) and it is considered that a development of around 50-60 dwellings would be considered suitable for Reedham. As outlined within the Reedham Booklet, services in Reedham include a primary school, village hall, food shop, public house and train station. Two sites are being considered for residential allocation within Reedham and as outlined within our previous representation during the Regulation 18 Stage C Consultation, we consider there are significant constraints with at least one of the sites (in particular GNLP3003) and this is acknowledged within the allocations as it states both sites have highway issues that may need further investigation and therefore it is considered these sites should be considered unacceptable and unfavourable for allocation as outlined below:

GNLP1001 – Proposed allocation for 30 dwellings

The site is located adjacent to an existing allocation (under development). Access to the site has been considered as a potential concern as it would need to be provided through the development to the west. It is also noted the Council acknowledge within their reason for allocation that it is not possible to provide an off-carriageway pedestrian footway for the whole route to Reedham primary school.

The site also lies adjacent to The Broads, therefore it is considered that any development on this site will likely have an impact on the character of The Broads.

GNLP3003 – Proposed allocation for 30 dwellings

This site is located to the east of Reedham, between the village (to the west) and Wherry Railway (to the east). The site was submitted for allocation for 50 dwellings but the GNLP has considered the site constraints and reduced the proposed allocation to 30 dwellings. The site has been considered as a proposed allocation despite the highways team considering the site as *‘Not feasible to provide a safe access, carriageway narrower than required for 2- way traffic & no footway to enable safe journeys to school. No scope for improvements within highway.’* This has also been acknowledged previously

within the Development Management comments which stated *'Consideration of access arrangements to be undertaken as the ability to achieve a safe access would appear compromised given limited site frontage to highway. This could prove to be a decisive constraint unless 3rd party land acquired.'*

The Council state within Appendix A – Allocated sites within Broadland villages within their reason for allocation that it is also accepted that it is not possible to provide an off-carriageway pedestrian footway to the school. It also remains the case that the vehicular access point at Mill Road will also require visibility over the frontage of 'The Brambles' to the north which may require third party land, which is yet to be resolved.

Other constraints relate that the fact that the site is abutted to the east by Wherry Railway which could impact on the amenity of future occupiers in terms of noise and vibrations and would require a significant buffer which would limit the development potential of the site. The site is also adjacent to The Broads, therefore any development on this site would likely impact its value as a national environmental asset.

It is clear that in addition to environment, ecological and amenity constraints, serious highway concerns have been raised and the Highways Authority have objected to residential development on this site and as outlined above it has still not been demonstrated that acceptable visibility splays and two-way access can be provided. Our client considers these concerns critical as providing safe access that would not significantly impact on highway safety is a key consideration reinforced in the NPPF. As it currently stands, this cannot be demonstrated therefore the allocation should be considered unacceptable and unfavourable.

Therefore, on this basis alone the Local Plan is considered to be unsound and it is considered that reasonable alternatives for residential allocation have not been fully considered. Our client's site, site reference GNLP4025, which was put forward as a new site to be considered for residential allocation during the previous Regulation 18 Stage C consultation, would represent a viable and indeed preferable alternative to that proposed allocation for the reasons highlighted below and additional supporting evidence submitted as part of this consultation. Indeed, our client owns a much larger parcel of land than put forward thus far for allocation and could be enlarged to meet the shortfall in housing provision for the village accordingly.

The Reedham Booklet considers our client's site and concludes the site to be unreasonable for allocation providing the following reason for rejection:

*This site is considered to be unreasonable for allocation as there is no safe walking route to Reedham Primary School which is some distance away and the surrounding highway network is poor with limited scope for improvement.*

This representation is supported by a Preliminary Highways Assessment and plans showing proposed footpath linkages which would be provided as part of the residential development of the site to provide a safe walking route between the site and Reedham Primary School to the south and also the village hall to the west. Our client owns land running along both Church Road, Pottles Lane and

Mill Road and therefore it is proposed that the residential development of the site would provide a footpath link between the proposed development site and the village hall to the west of the site along Church Road and Pottles Lane and would also provide a footpath link from the development site south along Mill Road towards the northern extents of the railway bridge along Mill Road. Both footpaths would be provided entirely within the client's land and would be 2.5m wide, with the final surfacing specification of the footpath to be agreed; however, it is considered it could be of a compacted gravel/TROD specification.

As outlined within the Preliminary Highways Assessment the proposed footpath would comply with the majority of the necessary requirements and solve a number of the issues outlined within the NCC Home to School and College Transport Policy 2020/2021. The footpath would terminate to the north of the bridge on Mill Road with a new road lining demarcating a 1m wide strip to indicate pedestrians in the road, running from the end of the proposed footpath to the start of the existing footpath over the bridge. This could be further enhanced with signage and other features which could be further investigated should it be required. The remaining route to the school south along Mill Road would comply with the requirements for a suitable walking route with good visibility, a verge to step into and its current usage as a walking route to the school and village.

An alternative option is also proposed, should the proposed footpath link be considered unsuitable and includes a proposed pickup/drop off bay being provided within the proposed site boundary, which would be used for any school children who need to get to the primary school from the properties along Church Street and the proposed residential allocation.

It is therefore considered that the site represents a suitable site for development that would provide new pedestrian links along Church Road, Pottles Lane and Mill Road to provide safe pedestrian access for existing and future residents. As outlined within our previous representation, it is noted that there are almost no defined formal public footpaths within the village, which has been accepted in context of even the most recent of planning permission, so the proposed footpath facilities now proposed as part of this residential allocation would provide valuable safe pedestrian access for existing and future residents to the existing services and facilities available in the wider village, including the primary school and therefore should be given significant weight.

It is considered the site can accommodate approximately 12 dwellings, comprising both market and a policy compliant level of affordable dwellings. As stated above, there is scope to enlarge the proposed allocation to bring forward an increased number of dwellings to meet any shortfall in housing need within the village. Nevertheless, as it stands, the scheme would also provide policy compliant contributions towards open space, green infrastructure and other relevant contributions. The site is suitable for the proposed residential use, it is available and achievable within the next five years, which makes the site deliverable as required within the NPPF.

The site represents a suitable site for the development proposed and should be considered favourable for residential allocation within Reedham. Our previous representation provides a detailed assessment of the considerations and why the site should be considered favourable and therefore this should be read in conjunction with this representation. In summary, the proposal represents organic growth of the village and would provide open market and affordable dwellings

for members of the local community. The proposal would also provide significant economic and social benefits in the form of a new pedestrian access along Church Road, Pottles Lane and Mill Road, providing safe pedestrian access for existing and future residents to the wider village, including the primary school, which should be given significant weight. The allocation of the site within the Greater Norwich Local Plan would go some way in meeting the required housing need for dwellings within this village cluster.

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

We have outlined a number of significant constraints with the proposed allocations, in particular site reference GNLP3003, and serious highway concerns have been raised and the Highways Authority have objected to residential development on this site. It has still not been demonstrated that acceptable visibility splays and two-way access can be provided to ensure safe highway access to the proposed development. Our client considers these concerns critical as providing safe access that would not significantly impact on highway safety is a key consideration reinforced in the NPPF. As it currently stands, this cannot be demonstrated therefore the allocation should be considered unacceptable and unfavourable.

For the reasons highlighted within question 5 it is considered our client's site is suitable, available for development now and achievable. Therefore, the proposed residential allocation would represent a viable and indeed preferable alternative to the proposed allocations for the reasons highlighted above and additional supporting evidence submitted as part of this consultation. The proposed allocation of this site for residential development would ensure the soundness of the GNLP and would make a valuable contribution to the housing need in Reedham.

The Local Plan covers the timeframe to 2038. Development of the site, which is proposed to provide approximately 12 dwellings is expected to commence in 2021/2022 following the granting of planning permission and it is estimated that the site could be completed within one year. The site, including the proposed footpath links are all in the sole ownership of our client and there are no impediments to bringing the site forward for development as soon as planning permission is achieved. Our client also owns a much larger parcel of land than put forward thus far for allocation and therefore the site could be enlarged to meet the shortfall in housing provision for the village accordingly.

As outlined in point 5, our client would propose a scheme of open market and a policy compliant level of affordable dwellings, and the scheme would also provide policy compliant contributions towards open space, green infrastructure and other relevant contributions. The proposed site would

make a valuable contribution to housing need in and around the village and therefore significant weight should be given to its allocation within the GNLP.