

Proposed Residential Development North of Kell's Way, Geldeston

Submission of Representations relating to South Norfolk Village Clusters Housing Allocations Plan - Pre-Submission Draft (Reg 19)

on behalf of the Saffron Housing Trust
and the Woodton United Charities

Ref: PP23/047540

Site Ref: VC GEL1

REPRESENTATIONS TO SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS PLAN – PRE-SUBMISSION DRAFT (REG 19) – MARCH 2023

Land off Kells Way, Geldeston (Site Ref: VC GEL1)

1. Introduction

1.1 On behalf of the Saffron Housing Trust and the Woodland United Charities, Brown & Co are instructed to submit representations in respect of the Pre-Submission Draft of the South Norfolk Village Clusters Housing Allocations Plan (VCHAP). The Saffron Housing Trust and the Woodland United Charities, are promoting land to the north of Kells Way, Geldeston – Site Ref: **VC GEL1**.

1.2 The Reg 19 VCHAP has the following draft policy for this site:

Policy VC GEL1: North of Kell's Way

0.76ha of land is allocated for up to 20 dwellings.

The developer of the site will be required to ensure:

- Vehicular and pedestrian access from Kell's Way;
- A Topographical Survey and full Landscape Assessment to inform the scale and density of the development which should reflect the existing housing within the Conservation Area: address the change in levels of the site; and protect the residential amenity of adjoining houses;
- Protection and enhancement of the existing vegetation on the site boundaries, particularly the established vegetation on the Old Yarmouth Road boundary;
- Historic Environment Record is consulted to determine the need for any archaeological surveys prior to the development.

1.3 Representations have previously been made during the 'Call for Sites' consultation as part of the Greater Norwich Local Plan (GNLP). The VCHAP has now reached Regulation 19 of its preparation, and the purpose of this consultation relates to the 'Tests of Soundness' and includes legal compliance as set out in the National Planning Policy Framework (Para 35).

1.4 The purpose of this representation is to:

- a) **Support** the continued allocation of the site for residential development and to confirm that the Saffron Housing Trust and Woodton United Charities are committed to working with the Council to deliver the aspirations as set out in draft Policy VC GEL1;
- b) **Object** to the specific wording of the proposed policy and propose alternative wording and seek amendments to the text to ensure that the policy is justified and effective; and
- c) **Respond** to other policies of relevance to delivering our proposals, where comment is necessary.

1.5 The VCHAP sets out three objectives:

Objective 1 – Meet housing needs. Deliver housing in accordance with GNLP housing target for the South Norfolk Village Clusters through the allocation of suitable, viable and deliverable development sites housing. (1200 new homes). Provide an appropriate mix of house types, sizes, and tenures to allow for residents at different parts of life cycle e.g., first time buyers, those seeking family housing and those looking to downsize or move to more suitable accommodation in later

life. Provide opportunities for 'self-builds' through the extension or amendment of settlement boundaries to allow 'in-fill' development in appropriate locations.

Objective 2 – Protecting village communities and support rural services and facilities. Provide opportunities for new housing development in a range of settlements within the village clusters, meeting the needs of a range of occupiers with the potential to support different local services and facilities and infrastructure where justified and appropriate.

Objective 3 – Protect the character of villages and their settings. Ensure that the scale, location, and density of housing is well related to the form and character of existing villages, protects the historic environment, including protected landscapes, and ensures appropriate landscaping measures are delivered as part of new development.

1.6 The VCHAP identifies Geldeston as forming part of the village cluster that includes Gillingham and Stockton. The cluster is identified as having a range of social and community facilities comprising a primary school, village hall, pub, shop, and recreational facilities. There is a petrol filling station and fast-food restaurant to the east at Gillingham.

1.7 We believe that the draft VCHAP is basically sound, as the strategy proposed is essentially justified and effective and provides a range of sites by which growth can come forward. The site to the north of Kell's Way in Geldeston, offers a very good opportunity to deliver growth in a manner that provides an appropriate to the sustainable objectives of the emerging VCHAP and NPPF. By undertaking this form of development on this site in a sustainable manner it would support the emerging VCHAP.

2. Comments on the 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 compatible with the overall purpose of the plan, in particular, the delivery of sustainable development which meets the challenges of climate change and supports ambitious local and national targets for carbon neutrality. The proposed distribution of growth is considered to be basically correct and suitably forward thinking to facilitate the transition to a post-carbon economy, and the emergence of the region as the UK leader in clean growth. In particular, we believe the proposed strategy is considered suitable to deliver beautiful places or spaces.

2.2 The NPPF also seeks to promote sustainable development in rural areas to maintain the vitality of rural communities and allow them to grow and thrive (para 79). We consider, therefore, that the strategy for the VCHAP should focus on delivering a range of opportunities for development that will connect and enhance existing local services and access areas of open space and access to the countryside.

2.3 In order to significantly reduce travel by way of private vehicles, and therefore emissions, a place-based approach is essential (RTPI, Net Zero Transport: The role of spatial planning and place-based solutions (2021) page 2). This would further provide a catalyst for better placemaking in order to deliver healthier, happier, and more resilient communities. The RTPI report echoes the Building Better, Building Beautiful Commission in their assertion that creating walkable neighbourhoods is key, stating that the "20 minute neighbourhood" concept is one of the key foundations upon which net zero transport networks can be built.

2.4 As previously indicated in earlier representations, the land to the north of Kell's Way forms part of an extension to a recently completed development, and is well related to the built form of

the village. The public house, village hall, and recreation ground are a short distance from the site. The bus routes between Beccles and Diss run along the Old Yarmouth Road, along Geldeston Hill, and the Street connecting the settlement with higher order facilities..

2.5 In order to meet climate change targets, housing need, and support sustainable employment and economic growth, more is required than delivering housing units. Rather, the focus is shifted to the creation of beautiful places and vibrant, resilient communities. Residential development on this site can deliver a range of housing opportunities as well as significantly contribute to the green infrastructure and enhance the ecological value of the area.

2.6 The creation of a residential development on this site would assist a modal shift from car reliance to walking and cycling through the creation of truly walkable neighbourhood. It would provide a suitable option for development now and represents the most effective way to significantly reduce transport emissions, and to create truly beautiful places and spaces. By creating a neighbourhood predicated on a green infrastructure network, supported by public transport links (including bus and train) it would ensure that walking and cycling form the primary modes of transport throughout the settlement, therefore, significantly reducing transport emissions whilst creating beautiful spaces.

Effective

2.7 In order to be considered effective, the NPPF states that the proposed strategy should be deliverable over the plan period. We believe with a suitably designed scheme, which recognises the constraints of the site could be delivered in such a way as to minimise landscape harm with the ecological and recreational benefits it potentially would bring. The site is deliverable as it is available now and has a realistic prospect of delivering housing within five years.

2.8 The site is being advanced by a well-known local builder/developer who is keen to deliver residential development and construct this site. There are no significant physical constraints to the development of the site, and we remain confident that this site can deliver housing units early in the lifetime of the Plan.

2.9 Demonstrating deliverability is fundamental to achieving a sustainable, well-planned development. As has been evidenced with Local Plans across the country, proposed allocations, particularly those for large-scale housing, can falter where it is considered that sufficient work has not been undertaken to robustly demonstrate their viability or deliverability. 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 provide a range of sites to create a number of outlets for growth to ensure growth is achieved through the Plan period.

2.10 This site is being promoted by a locally based developer who has a track-record of delivering housing development in the area and can develop appropriate, green-led proposals for the site. The proposal site is within a single landownership, as a result there would be no disputes regarding which elements of the development come forward first, no time-consuming discussions around equalisation, and no negotiations over the distribution of infrastructure cost, all of which can cause significant delay and even permanently stall projects.

3. Proposed amendments to Policy

3.1 We wish to see the following changes to the wording of the policy (for ease of reference the replacement wording is highlighted in yellow below) :

Policy VC GEL1: North of Kell's Way

0.76ha of land is allocated for **up to 25 dwellings**.

The developer of the site will be required to ensure:

- Vehicular and pedestrian access from Kell's Way;
- A Topographical Survey and full Landscape Assessment to inform the scale and density of the development which should reflect the existing housing within the Conservation Area; address the change in levels of the site; and protect the residential amenity of adjoining houses;
- Protection and enhancement of the existing vegetation on the site boundaries, particularly the established vegetation on the Old Yarmouth Road boundary;
- Historic Environment Record is consulted to determine the need for any archaeological surveys prior to the development.

3.2 We are seeking amendments to the policy to increase the potential number of units on the site. Having undertaken some initial work on the site, we believe that the site is capable of delivering up to 25 units. This is in accordance with paragraph 119 of the NPPF which seeks to ensure the effective use of land in meeting the need for homes and other uses. Plans confirming that up to 25 units can be accommodated on the site, accompany these representations as separate documents showing an illustrative site layout, and a concept layout with opportunities and constraints.

4. Conclusions

4.1 The VCHAP in its current form is considered to be sound as the strategy adequately delivers on the overall purpose of the plan in providing a range of development, in particular addressing the challenges of climate change and supporting ambitious local and national targets for carbon neutrality. We would support the distribution of growth insofar as it seeks to support the rural communities and sustain them for the foreseeable future and facilitate the transition to a post-carbon economy or to create truly beautiful places or spaces. The draft VCHAP recognises the need to deal with the challenges of climate change and carbon neutrality and adapt accordingly, and this is supported.

4.2 The proposed development would make a positive contribution to the provision of housing in the area. The proposal would also add to the range of housing sites available in the locality, providing flexibility and a wider choice of development opportunities to the market, and thus strengthening the local supply of housing land. By providing sufficient land of the right type in the right place to support growth, the development would address the economic dimension of sustainable development, as defined in the NPPF.

4.3 We consider this form of development that is part of the draft allocation for this village, led by the green credentials of the locality would result in tangible benefits for the community and provide housing in a holistic and sustainable way in order to create a vibrant and resilient community and support the move to a post-carbon economy. Government has recognised the role that residential development can have in achieving sustainability and creating communities, where there is no

choice between quality and quantity and green spaces amount to more than token verges and squares.

4.4 As already noted in previous submissions, no significant constraints have been identified to date which would be likely to delay or impede the development of the site for housing. The site is in a single ownership with agreement from the adjacent landowner to provide access, and no further land is needed to enable the land to be brought forward for development. The land is currently available for development and so, subject to approval being given, could deliver housing in the short term.

4.5 The Saffron Housing Trust are a respected local developer, currently delivering schemes in a number of locations in the area. Their high-quality designs and attention to detail result in exquisite homes, which pay homage to the local character whilst creating their own identity. The Trust are keen to develop this site as soon as possible in order to meet local needs and demand, should the site be allocated then the development could be delivered quickly.