



**GNLP Regulation 18 Consultation Response
March 2018**

**Land to the rear of 16 Poringland Road, Upper Stoke
Site Reference: GNLP0494**

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1. Executive Summary

These representations are submitted of behalf of Glavenhill (Number 10) Limited (Glavenhill) in response to the Greater Norwich Local Plan Regulation 18 Consultation and relate primarily to Land to the rear of 16 Poringland Road, Upper Stoke (hereon in referred to as the 'proposed allocation site') (see Section 3 for site extent).

These representations follow on from the proposed allocation site's submission to the Greater Norwich Local Plan 'Call for Sites' consultation in July 2016.

The proposed allocation site has been considered by the Greater Norwich Growth Board and is assessed for its suitability for residential development within the Housing and Employment Land Availability Assessment (December 2017) (HELAA) which is released in support of this Regulation 18 Consultation under site reference: GNLP0494.

The proposed allocation site has since the Call for Sites exercise been assessed by Glavenhill's project team for its suitability for housing and an application for outline planning permission was submitted to South Norfolk District Council in December 2017 (LPA reference: 2017/2871). The application is pending determination. The application documentation and consultee responses submitted and received to date are referred to in these representations as demonstration of the proposed allocation site's suitability and deliverability for residential use and to assist in clarifying those queries raised by the Greater Norwich Growth Board (GNGB) on the site within the HELAA.

Glavenhill has considered the draft Greater Norwich Local Plan and provide comment on the suitability or otherwise of the proposed Growth Options, including the level and distribution of this growth. Glavenhill has serious concerns over the GNGB's calculation of the overall housing requirement and provide a suggested alternative requirement.

It is Glavenhill's submission that the proposed housing growth is best accommodated through the allocation of a new settlement in the Cambridge-Norwich Tech Corridor, alongside a range of less strategic sites that should be located in sustainable locations in and around existing sustainable settlements.

The allocation of Land to the rear of 16 Poringland Road, Upper Stoke, should form part of that Strategy.

The proposed allocation site has been demonstrated through the planning application process to be sustainably located on the edge of the Key Service Centre of Poringland and within the Norwich Policy Area. The proposed allocation site is an appropriate and sustainable place to accommodate new housing development.

Contrary to the conclusions of the HELAA, the site has been demonstrated through the planning application process to be safely and appropriately accessed from Poringland Road and to have easy access to a range of local services.

In clarification of the HELAA constraints and opportunities assessment, the proposed allocation site is not at significant risk of flooding or contamination and housing development can be accommodated within the capacity of the local sewer network.

There are no overriding constraints that would prevent the proposed allocation site from being developed for housing within the early stages of the Plan Period and Glavenhill respectfully request it be allocated within the emerging Greater Norwich Local Plan.

2. Site Introduction and Description

Introduction

These representations are submitted of behalf of Glavenhill (Number 10) Limited (Glavenhill) in response to the Greater Norwich Local Plan Regulation 18 Consultation and relate primarily to Land to the rear of 16 Poringland Road, Upper Stoke (hereon in referred to as the 'proposed allocation site') (see Section 3 for site extent).

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The planning application documentation is not enclosed with these representations due to its size, but can be obtained from South Norfolk's Public Access database under the aforementioned planning application reference.

Site and Surroundings

The proposed allocation site is located to the western side of the village of Poringland, within an area known as Upper Stoke.

Whilst the proposed allocation site falls within the Parish of Stoke Holy Cross, it is physically connected, and benefits from its easy accessibility to, the shops and services located within the Key Service Centre of Poringland.

The majority of the proposed allocation site lies outside of the defined settlement limit of Poringland as currently defined on Map 009 of the Council's Site Specific Allocations and Policies Document. However, the existing bungalow (no 16 Poringland Road) falls within the settlement limit and the northern and western boundaries of the site coincide with the defined settlement limit. The proposed allocation site in all sense and purposes, forms a logical extension to the existing settlement.

The proposed allocation site is well served by public transport with a number of bus stops located on Poringland Road / Long Lane which provide regular services to Norwich City Centre.

The proposed allocation site comprises circa 3.4 hectares of agricultural land together with an existing residential property and its curtilage (no 16 Poringland Road).

The proposed allocation site is largely rectangular in shape with a narrow linear strip (currently containing the vacant residential property (no. 16 Poringland Road)) which connects the site to Poringland Road. A further, wider rectangular parcel of land extends from the south-eastern corner.

The proposed allocation site is bound to the north by residential gardens, to the west by residential properties and their gardens on Brickle Loke, to the south by dense woodland and agricultural land and to the east by a public footpath and agricultural land beyond.

Designations

The proposed allocation site does not contain any statutory ecological designations. The site is not located within a conservation area and there are no Listed buildings or Scheduled Ancient Monuments located on or within close proximity to the site.

The woodland to the immediate south of the site is the subject of a Tree Preservation Order (TPO).

The proposed allocation site is located in Flood Zone 1 as shown on the Environment Agency's online flood maps and is at limited risk of flooding.

3. Site Location



Figure 1 – Site Location Plan

4. Site Opportunities

Deliverability

The proposed allocation site is sustainably located and appropriate for residential development. The site is wholly within the ownership of Glavenhill Strategic Land Number 10 Limited and is available and deliverable in the short term.

The proposed allocation site is currently the subject of an outline planning application for residential development. The application has been informed and is supported by a number of technical assessments which demonstrate its appropriateness for development and these assessments are drawn on within these representations as evidence of its appropriateness for allocation.

The outline application fixes the point of access into the proposed allocation site from Poringland Road which is detailed on the submitted access drawing (see **Figure 2** below and **Appendix 1** for a larger version). Norfolk County Council Highway Authority provide no objection to the proposed access point, which is considered safe and wholly deliverable.

Design and Site Capacity

A masterplanning process has also been carried out for the proposed allocation site, founded on a thorough analysis of the site and its surroundings.

The current illustrative masterplan prepared and submitted in support of the pending outline planning application (enclosed at **Figure 3** below) shows how residential development can be appropriately and sustainably achieved on the site whilst respecting the site's environmental context. It also demonstrates how development may respect the residential and visual amenities of nearby residents and the wider area to deliver a mixed and balanced residential community.

Consideration has also been given to the potential impact of development on the local landscape through the application process and how, through the provision of appropriate design, the local character and biodiversity of the area may be enhanced.

Provision is made within the illustrative masterplan for new and improved boundary treatment in order to avoid and protect adjacent protected trees and to assimilate the residential development within its surroundings.

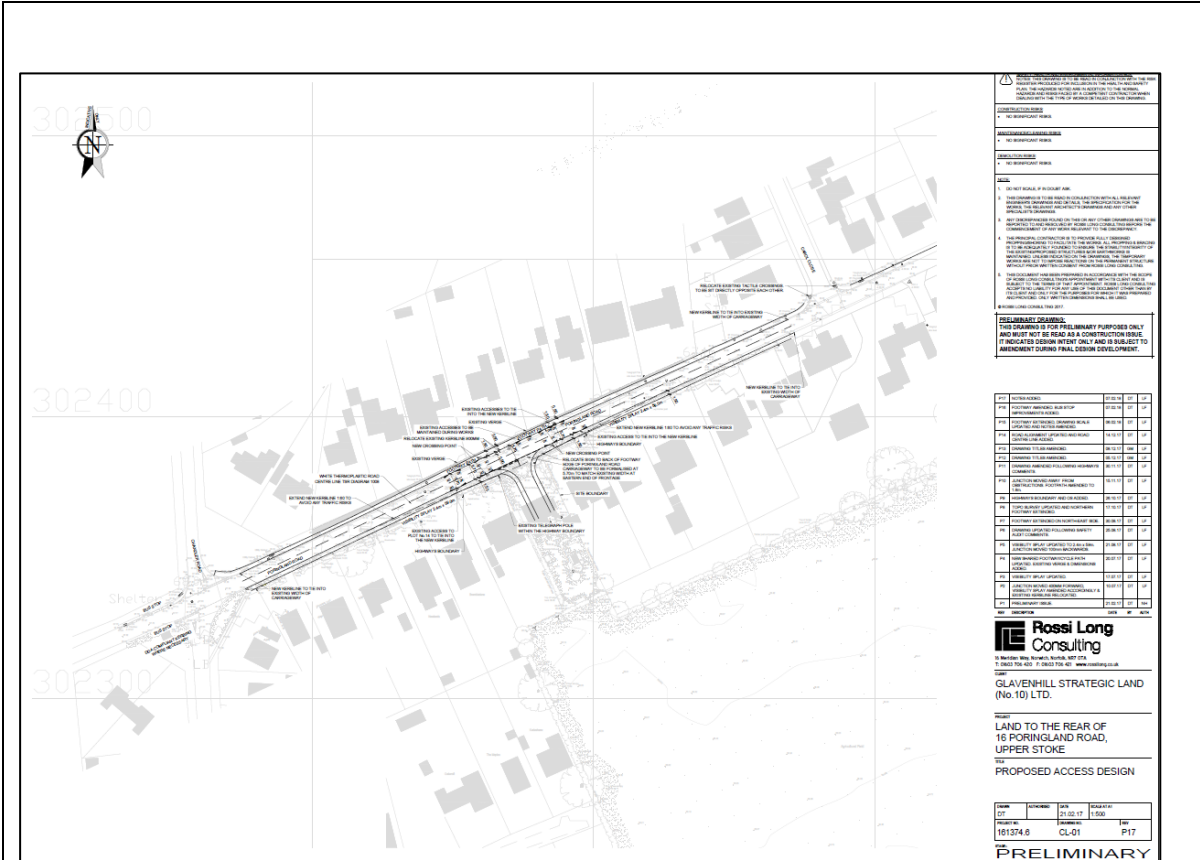


Figure 2 - Site Access Plan (replicated at Appendix 1)



Figure 3 – Current Illustrative Masterplan

Landscape, Trees and Ecology

The proposed allocation site is bound to the north and west by residential development and to the south by an area of woodland. The site is however, open on its eastern boundary which is also demarked by a Public Right of Way (PRoW). In appreciation of the openness of this boundary, Glavenhill commissioned a Landscape and Visual Impact Appraisal (LVIA) of the planning application proposals. South Norfolk’s Landscape Officer does not dispute the findings of the LVIA, notably that the localised adverse effects that may be experienced by users of the adjacent footpath and occupiers of adjacent properties will be reduced over time as the new planting and trees mature.

The area of woodland to the south of the application site is subject to a tree preservation order (TPO). Consideration has been given to the presence of the woodland and the impact of root protection areas and overshadowing from canopies on the developable area of the site. The illustrative masterplan prepared and submitted in support of the outline planning application demonstrates how development at the proposed allocation site can work within these constraints without significant adverse impacts.

The ecological potential of the proposed allocation site has been assessed and detailed within an Ecological Report which has been submitted in support of the outline planning application. Norfolk County Council's Senior Green Infrastructure Officer has reviewed the Report and provides no objection to the application, subject to the inclusion of appropriately worded planning conditions on any planning permission.

Transport and Access

The ability to achieve a safe point of access (see **Figure 2 and Appendix 1**) into the site from Poringland Road and the impact of the application proposals upon the local highway network has been assessed within a Transport Statement that is submitted in support of the outline planning application.

Norfolk County Council, Highway Department provide no objection to the proposed access arrangements nor to the applicant's offer to extend, where possible and practical, the existing footpath that runs between the site and the Norfolk Homes development on the northern side of Poringland Road.

Heritage

There are no above ground heritage assets on or within close proximity to the proposed allocation site that will be affected by the site's development.

Consideration has been given to the archaeological potential of the site as part of the outline planning application. The submitted Archaeological Desk Based Assessment demonstrates that any archaeological remains present at the site are unlikely to be of such significance to warrant preservation in situ. Norfolk County Council's Historic Environment Officer does not dispute this conclusion.

Ground Conditions, Flood Risk and Drainage

A Phase 1 Geo-Environmental Assessment has been undertaken for the proposed allocation site and is submitted in support of the outline planning application. The Assessment confirms that the overall contamination risk of the site is 'low' and that the risk to development from foundation complexity is also 'low'.

The flood risk potential of the site and the means by which to ensure its future development does not result in additional risks elsewhere, (through the application of appropriate drainage methods) is assessed in the Flood Risk Assessment and Drainage Strategy prepared and submitted in support of the outline planning application.

The Assessment confirms that the proposed allocation site is located within Flood Zone 1, at low risk of flooding.

The ground conditions at the site are not suitable for infiltration of surface water run-off due to the presence of impermeable soil and a poor infiltration rate. A sustainable approach is however, demonstrated to be achievable and includes the storage of surface water in an attenuation basin to the south east of the site and the discharge of water to the local watercourse system at a controlled rate. The Lead Local Flood Authority provide no objection to the draft drainage strategy.

Conclusion

In conclusion, the suitability and deliverability of the site for residential development has been demonstrated through the outline planning application process.

The results of the site specific survey work are summarised in Section 6 of this report and are used with reference to the Greater Norwich Growth Board's suitability criteria (presented in the HELAA) to demonstrate the site's appropriateness for allocation within the GNLP.

5. Consultation Questions

The following section provides Glavenhill's response to the various questions posed on the draft GNLP within the Greater Norwich Local Plan Growth Options Document with specific reference to the proposed allocation site at Upper Stoke.

Section 3 – The Vision and Objectives for Greater Norwich

1. Do you agree with the draft vision and objectives for the plan below?

Glavenhill broadly agree with the vision and objectives for Greater Norwich to 2036 as set out at Figure 1 of the Growth Options Document, which place considerable emphasis on the promotion of development and growth within the Plan Area, subject to our more detailed representations on specific issues (below).

Section 4 – The Strategy Delivering jobs, homes and infrastructure

2. Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1-4.7?

The Greater Norwich Local Plan is an opportunity to build on the significant existing attributes of the Plan Area to make the wider Norwich area a hub for investment, commercial activity and high-quality place making, which will be of benefit to all who live and work there.

Glavenhill welcome the joint working of the different authorities, who are leading the Plan Making process, and provide a strategic view to Plan Making which is essential to the future prosperity of the Greater Norwich area.

The Greater Norwich Local Plan Review provides a unique opportunity to deliver a comprehensive and conjoined approach to delivering growth.

The Strategy gives appropriate recognition to the need for growth and investment, particularly in key infrastructure.

There is a need for the Greater Norwich area to benefit from the economic growth of the greater Cambridge area and not be left behind. Greater Norwich, at the very least, must protect its economic position within the eastern region.

The draft Strategy recognises the positive attributes of the Greater Norwich area. However, to ensure a bright and prosperous future, an ambitious strategy is essential.

Glavenhill do however, have serious concerns over the Greater Norwich Growth Board's (GNGB) calculation of the overall housing requirement for the plan period (set out in answer to Question 4 below).

The favoured option must be to deliver forecast jobs growth plus additional growth. Glavenhill are of the view that a realistic assessment of the requirement would lead to a figure of in the order of 11,000 new homes over the Plan Period to 2036 in order to deliver on the aspirations of the City Deal.

It is Glavenhill's submission that the proposed housing growth is best accommodated through the allocation of a new settlement in the Cambridge-Norwich Tech Corridor, alongside a range of less strategic sites that should to be located in sustainable locations in and around existing sustainable settlements.

The allocation of Land to the rear of 16 Poringland Road, Upper Stoke should form part of that Strategy.

Job Targets

3. Which option do you support for jobs growth? (refers to options on pg.28)

Recognition is given within the Greater Norwich Local Plan (GNLP) Regulation 18 consultation document (the GNLP) to the positive attributes of the Greater Norwich area. However, to ensure a bright and prosperous future for the Plan Area, an ambitious strategy to growth and investment is essential.

The Greater Norwich Local Plan provides an opportunity to make the wider Greater Norwich area a hub for investment, commercial activity and high-quality place making, which will be of benefit to all who live and work there.

The favoured option must, therefore be to deliver forecast jobs growth plus additional growth (Option JT1).

Calculating the Housing Numbers for the Plan

4. Do you agree that the OAN for 2017-2036 is around 39,000 homes?

Glavenhill broadly support Growth Option 3 to support the Cambridge-Norwich hi-tech corridor. However, the overall housing requirement number of 7,200 dwellings derived from an OAN of around 39,000 homes is considered too low.

The GNLP 2016 call for sites consultation suggested that around 12,000 new homes were needed across the Plan Period. Lanpro is surprised that this figure has reduced so significantly to 7,200 homes. We do not (for the reasons set out below) consider this figure sufficient to meet the housing requirement for the Greater Norwich area for the period to 2036.

Glavenhill do not support the use of the Government's proposed methodology for the calculation of OAN as set out in the consultation paper 'Planning for the Right Homes in the Right Places' in its current form. The methodology is still at the consultation stage and has been subject to a significant number of objections e.g. from the Planning Officers Society, Homebuilders Federation and the RTPI. One concern with the proposed methodology is its failure to consider economic objectives. There is no certainty that this methodology will come into effect, either in its current form, or at all and cannot be relied upon as the sole basis for calculating the OAN.

Glavenhill do not support the figure of 7,200 homes arising from the use of the draft Government methodology for the calculation of housing numbers. Para 4.17 of the GNLP states that the OAN figure for the Greater Norwich area is 38,988 dwellings for 2017 - 2036 based upon this methodology. This figure should be used with caution because it uses figures taken from the 'Application of proposed formula for assessing housing need, with contextual data' table that accompanies the Government Consultation document. This is an indicative assessment of required dwellings per annum based upon a draft formula for the period 2016-2026, (rather than for the period 2017 -2036). Furthermore, it fails to consider economic objectives for the area.

The calculation of the OAN should in any event, be regarded a starting point for calculating housing numbers for the GNLP. The Government's OAN figure does not include the housing necessary to deliver economic objectives via the City Deal which has been agreed with Central Government in order to help turn knowledge into growth and 13,000 additional jobs'.

Delivery of these objectives is necessary to ensure that the area is eligible to receive the related Government funding for infrastructure and business support, enterprise and innovation. It is important that the City Deal requirements are included as they have already been committed to and will contribute to the Greater Norwich and wider economy.

Plan makers are entitled to utilise different methods for assessing need and if these produce figures that are higher, the Government proposes that Inspectors should consider such approaches sound unless there are compelling reasons to indicate otherwise. Therefore, where it is sensible to propose higher figures based upon employment growth or higher affordable housing needs, there is scope to do this and the "significant contribution" that Government sees the City Deal making "to the recovery and future growth of the UK economy" (source: Greater Norwich City Deal) is valid justification for this.

Furthermore, paragraph 158 of the National Planning Policy Framework (the Framework) requires that Local Plans to ensure that strategies for housing and employment set out in their plans are integrated and take full account of relevant market and economic signals. Not including the City Deal requirements would fail to meet this requirement.

If the City Deal housing requirements are added to the Government OAN figures, the housing requirement for the period 2017-2036 should be as follows:

Government OAN figure 2017-2036:	38,988
Minus commitments of:	35,665
Sub Total:	3,323
Plus, City Deal Housing Requirement from 2017 SHMA (SHMA fig:101)	8,361
Subtotal:	11,684
Plus 20% buffer (see qu6 reasoning below):	2337
TOTAL HOUSING REQUIREMENT (2017-2036):	14,021

Glavenhill consider that the up to date calculation of housing need within the Central Norfolk Strategic Housing Market Assessment (June 2017) (the SMHA) should be used until the Government's methodology is formally put into practice.

The SHMA sets out a Policy-on full objectively assessed need for housing for the period 2015-36 for the Greater Norwich Area of 44,714 including the City Deal housing requirement (Figure 96: SHMA). This would indicate a residual requirement of 10,859 homes 2015-2036 taking into account a 20% buffer:

Policy-on SHMA OAN figure including City Deal:	44,714
Minus commitments of:	35,665
Subtotal:	9,049
Plus 20% buffer (see qu6 reasoning):	1810
TOTAL HOUSING REQUIREMENT (2015-2036):	10,859

Paragraph 5.7 of the SHMA states:

“We would note that in the Central Norfolk SHMA 2015, the potential impact of the City Deal was considered part of the OAN, but greater clarity now indicates that it is an aspirational jobs target which should be treated as part of the housing requirement not the OAN.”

It is important that the City Deal requirements are not ignored and are included in the final housing requirement figure as they have already been committed to and will contribute to the Greater Norwich and wider economy. This should be the case whether the Government or SHMA OAN methodology is used.

Both scenarios suggest that the housing requirement to 2036 should be significantly higher than the 7,200 homes specified in the Growth Options Document and a figure in the order of 11,000 would be more appropriate.

The Growth Options Document is unclear about the proposed base date of the plan and Glavenhill consider that clarity on this is required once the OAN methodology is confirmed. Rebasings the start date of the Local Plan to 2017, should not be used as an excuse to reduce previous backlog. Both above methodologies are set to different plan start dates, but both are intended to take into account previous backlog in assessing the housing requirement going forward.

Glavenhill also question the deliverability of some of the existing 35,665 homes committed to through existing allocations and or permissions and further consideration should be given to these sites to ensure that a robust figure is used in the calculation of the housing requirement.

5. Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?

The figure of 7,200 homes is considered too low for the reasons set out above and because a 10% delivery buffer is too low. This is particularly the case bearing in mind the track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current Joint Core Strategy. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area. Whichever of the 6 growth options, or variations on them is finally chosen, it is likely that the vast majority of housing will be allocated in locations in and around Norwich because this is a sustainable model for future growth. All of the growth options show over 70% of housing located within the Norwich Policy Area.

Glavenhill consider that in order to ensure competition and choice in the availability of housing land and reduce the future likelihood of lack of 5-year supply, a 20% buffer should be added to the OAN figures for the purposes of calculating the housing requirement. Windfalls should not be relied upon to make up any shortfalls. (see question 6 for more information).

6. Do you agree that windfall development should be in addition to the 7,200 homes?

Paragraph 4.24 of the GNLP states that “based upon current trends and projected future delivery, it is estimated that an additional supply of up to 5,600 dwellings could be provided during the plan period on “windfall” sites”.

Glavenhill contend that this is an over estimate. Recent trends have been very much influenced by the lack of 5-year housing land supply within the Norwich Policy Area. If during the new plan period there is no longer a shortage of 5-year land supply, then the amount of housing delivered through windfall sites will be significantly reduced.

Windfall development in recent years has been dependent upon the availability of unallocated brownfield sites within the city and other towns. Due to the emphasis on brownfield development in recent years, this source of windfall sites is also likely to be reduced during the new Plan Period. As such, the Strategy for the distribution of new housing should not rely upon significant amounts of windfall coming forward within the plan period to deliver the required housing numbers. Windfall should be in addition to the final housing requirement number chosen.

Delivering Infrastructure

7. Are there any infrastructure requirements needed to support the overall scale of growth?

Inevitably, with any significant housing and employment growth, there will be supporting infrastructure requirements. It is essential that these are properly planned for at the outset. Opportunities for better public transport linkages, including rail and bus also need to be properly considered.

How should Greater Norwich grow?

Existing Housing Commitment

8. Is there any evidence that the existing housing commitment will not be delivered by 2036?

The existing housing commitment, which comprises allocations in the Joint Core Strategy (JCS) and sites with planning permission, is substantial at 35,665 homes. There has been a track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current JCS. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area.

Although at this stage Glavenhill are not aware of any hard evidence that the commitment will not be delivered by 2036, but do believe that it should be treated with caution and it is therefore essential that an adequate buffer is added to the housing requirement figure in order to mitigate both under delivery of the commitment and of new allocations.

The Growth Options (options on pg.39-40)

9. Which alternative or alternatives do you favour?

Glavenhill broadly support Option 3 'Supporting the Cambridge to Norwich Hi-Tech Corridor' with some variations. These variations relate to the overall level of housing proposed, which we consider should be within the region of 11,000 new homes rather than the 7,200 set out within the Growth Options Document. The reasons for the additional requirement are set out in our answers to questions 4-6 above.

In order to accommodate the additional numbers, Growth Option 3 should be amended as follows:

- Provision of circa – 2000 units to a new settlement within the Plan Period (more to follow post 2036).
- Allocation of additional brownfield sites within Norwich City if available options can be identified.
- Allocation of additional (circa 1000 units) to the north-east on non-strategic sites (small to medium) to provide short term delivery in this area and to supplement larger growth triangle sites where delivery rates have been slow to date and to help provide City Deal housing requirement in association with employment growth around the airport.

- Any remaining requirement to be split proportionally between other locations identified under option 3.

The reasons for choosing Option 3, 'Supporting the Cambridge to Norwich Hi-Tech Corridor' (as amended) are as follows:

1. This option would ensure that the proposed housing growth is closely aligned with the ambitions of the New Anglia LEP Strategic Economic Plan which aims to deliver economic growth in identified Growth locations including Greater Norwich to build on the City Deal and within the A11 corridor. These locations are identified in the Strategic Economic Plan because they host high impact sector activity and are expected to grow over the plan period. There is a recognition within the plan that *"the northern part of the corridor has strong potential to develop its advanced manufacturing sector with a focus on Hethel Science and Technology Park and Snetterton."*

The Growth Options document recognises that *"The A11 corridor is a major focus of growth, with the route providing key strategic access to London, Cambridge and much of the rest of the UK. The Cambridge-Norwich Tech corridor initiative aims to boost economic development"*. The document sets an indicative target to provide around 45,000 jobs 2015 -2036 (para 4.12 of Growth Options Document) and proposes that the Greater Norwich Local Plan should aim to deliver forecast jobs growth plus additional growth which is consistent with evidence and the City Deal agreement with Government. Option 3 will provide the best support to enable the jobs potential of the Hi-Tech corridor to be realised in addition to jobs growth associated with the city centre, NRP and airport.

2. Option 3 provides the opportunity to focus significant growth in an area which could effectively create an extension of the Cambridge, Milton Keynes, Oxford corridor, which will be the subject of significant investment. In order to compete effectively with and benefit from the Cambridge regional growth, this option is essential.
3. Growth Options 1-3 have been scored the same within the Interim Sustainability Appraisal and perform significantly better in sustainability terms than options 4 -6. Options 4-6 should be discounted as least sustainable. The provision of adequate infrastructure and services to support new housing is extremely difficult under dispersal options and the increased level of public opposition to numerous dispersed sites that may not be properly served by infrastructure and services should not be under-estimated. This is not to say that there should be no dispersal. Where smaller sites in or on the edge of towns and villages can bring community benefit or help support the sustainability, viability and vitality of existing services and facilities, this should be supported. Glavenhill consider that option 3 provides the right level of dispersal without making this the focus of the growth strategy.
4. There are some similarities between Option 2 (Transport corridors) and Option 3 (supporting the Cambridge to Norwich Hi-Tech corridor) as both are focused upon

Transport routes. There are, however, significant advantages in choosing Option 3 over Option 2 as it would enable housing development and investment to be focussed in a core area that has the potential to generate significant employment in line with the Strategic Economic Plan objectives. This is a sustainable approach because it provides homes close to where the jobs will be created. This area also has the potential to benefit from funding sources through the LEP and Central Government to help deliver the Strategic Economic Plan objectives for the High-Tech corridor. Putting more development in other transport corridors as proposed under option 2 would disperse development further, would be unlikely to benefit from the same funding streams and has less potential for job creation and contribution to the local economy. There is also a danger that locating housing on key transport corridors will only add to existing commuting into Norwich, where the majority of employment opportunities are located. A new settlement within the Hi-Tech corridor under Option 3 can provide new homes close to new jobs and enable a planned approach towards infrastructure provision linking into various funding streams.

Option 1, (concentration close to Norwich) obviously scores well in sustainability terms but is very much a repeat of the existing Joint Core Strategy. There have been significant issues with delivery of the JCS numbers, particularly in certain areas and a repeat of this is not a desirable outcome. To accommodate the majority of the required housing numbers within an option 1 scenario would require significant additional pressure being placed upon Norwich Policy Area towns and villages, and the urban fringe, that are already experiencing high levels of growth under the JCS. As our evidence suggests that in the region of 11,000 new homes are required rather than the 7,200 specified in the Growth Options Document, there is a need to find sites for significantly more homes than currently presented under this option. Although there may be scope to find some more suitable brownfield sites within Norwich, it is not considered that there is sufficient capacity under this option to accommodate all of the growth requirement without having an adverse impact upon the character of fringe settlements, as well as increased pressure on infrastructure and services.

The additional benefit of Option 3 is that as well as directing significant growth to a corridor that can bring valuable benefits in terms of Hi -Tech job creation, the development of a new settlement based upon garden village principles will have less impact upon existing towns and villages than too many bolt on urban extensions that do not always provide the required level of infrastructure and facilities.

5. Glavenhill consider that the 11,000 homes required would be best accommodated by growth Option 3 that provides for a new settlement in the right location to help deliver on economic growth objectives as well as providing a sustainable level of additional growth to Norwich, its fringe settlements and other main towns and villages.
6. Glavenhill understand that there may be some nervousness regarding the ability to realise the delivery of a new settlement to garden village principles under this Growth Option

bearing in mind that this would be a new approach in this area. However, Glavenhill believe an ambitious strategy is necessary to ensure a prosperous future for the area, which also respects the key characteristics of Greater Norwich. Promotion of a new settlement offers a high level of local authority engagement in the development process to ensure that there is the correct framework in place for long term investment for required infrastructure and to ensure that the completed development is vested with the local community and there is sufficient long-term income flow to ensure long-term stewardship. Glavenhill believe that this is a deliverable model.

10. Do you know of any infrastructure constraints associated with any of the growth options?

With any significant housing and employment growth there will be supporting infrastructure requirements. It is essential that these are properly planned for at the outset.

The delivery of infrastructure for the dispersed growth options will be difficult. Glavenhill believe that the dispersal Options (4,5 and 6) provide significantly more constraints than the more concentrated growth Options (1-3).

Planning at scale by way of new settlements enables long term funding streams to provide infrastructure needed for the occupants and the wider area. This can be linked with existing employment centres.

However, the provision of small to medium growth within or adjacent to existing local service centres or villages can meet specific local needs, the details of which are demonstrated within the site specific sections of these representations.

11. Are there any other strategic growth options that should be considered?

12. Do you support the long-term development of a new settlement or settlements?

Green Belt

13. Do you support the establishment of a Green Belt? If you do, what are the relevant “exceptional circumstances”, which areas should be included, and which areas should be identified for growth up to and beyond 2036?

Glavenhill do not support the establishment of a Green Belt. This would only serve to push the required housing numbers further into the countryside in order to achieve a protected area around Norwich. This would be unsustainable because it would increase the length and number of journeys into the city and would be likely to have a greater environmental impact on countryside locations.

Norwich City Centre Defining the City Centre Area
14. Should the area defined as the city centre be extended?
Strategic City Centre Policy
15. Do you support the approach to strategic planning for the city centre in 4.80 above?
City Centre Offices
16. What should the plan do to reduce office losses and promote new office development in the city centre?
Retailing
17. What should the plan do to promote retailing in the city centre?
Leisure and Late Night Activity Zone
18. Should the focus for late night activities remain at Riverside, Prince of Wales Road, and Tombland, or should a more flexible approach be taken?
City Centre Housing
19. What should the plan do to promote housing development in the city centre?
Cultural, Visitor and Education Facilities
20. How can the plan best support cultural, visitor and educational uses in the city centre?
Remainder of the Norwich Urban Area and the Fringe Parishes
21. Do you support Option UA1 for the remainder of the urban area and the fringe parishes?
Main Towns
22. Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?
Settlement Hierarchy
23. Do you agree with the approach to the top three tiers of the hierarchy? Glavenhill support this approach.
24. Do you favour option SH1, and are the villages shown in appendix 3 correctly placed?

Glavenhill favours option SH1 which promotes the continuation of the current approach i.e for the level of growth that is to be apportioned to different settlements to respond to their scale and their number and range of services.

Glavenhill is supportive of the recognition given to the roles played by Key Service Centres and Services Villages in the settlement hierarchy within paragraphs 4.113 and 4.114 of the Growth Options Document.

Glavenhill agree that growth should be apportioned to these settlements in accordance with their position within the settlement hierarchy and with the aim of promoting sustainable forms of development.

Glavenhill are cognisant of the fact that in some rural areas, villages may share services and that only through doing so, may be considered sustainable places for growth.

However, Glavenhill consider it inappropriate based upon the evidence available at this time to 'group' the settlements in tiers 4 to 6 of the hierarchy into a single tier to reflect this inter-relationship.

25. Do you favour the Village Cluster approach in option SH2?

Glavenhill do not support the village cluster approach set out in option SH2 of the Growth Options Document.

Grouping Service villages with other villages and smaller rural communities could, in Glavenhill's view and based upon the evidence available at this time, result in the differences between settlements i.e. their respective suitability to accommodate additional growth, to be 'masked'. It is possible that the cluster approach may, contrary to its assumed intention, lead to uncertainty over the level of growth to be experienced in rural areas, making it difficult to plan for infrastructure and service provision.

Glavenhill recommend for the reasons stated above and based upon the evidence currently available, that the existing 6 tier hierarchy be retained (as per Option SH1 of the Growth Options Document).

25a. What criteria should be used to define clusters?

See Glavenhill's response to question 25 above

25b. Which specific villages could form clusters?

See Glavenhill's response to question 25 above

<p>25c. How could growth be allocated between villages within a cluster?</p> <p>See Glavenhill's response to question 25 above</p>
<p>The Influence of the Norwich Urban Area</p>
<p>26. Do you support a Norwich centred policy area and, if so, why and on what boundaries?</p>
<p>Section 6 – Topic Policies The Economy The Supply of Employment Land</p>
<p>27. What option or options do you support? (refers to options on pg.71-2)</p>
<p>28. Which allocated or existing employment sites should be identified as strategic sites and protected?</p>
<p>29. Are there employment areas that should be identified as suitable for release for residential uses?</p>
<p>30. Are there any new employment sites that should be allocated?</p>
<p>Accommodating Expenditure Growth</p>
<p>31. Should the position of any of the centres in the retail hierarchy be changed?</p>
<p>32. Do any of the existing retail centres have scope to expand to accommodate further floorspace?</p>
<p>The Rural Economy</p>
<p>33. What measures could the GNLP introduce to boost the rural economy?</p>
<p>Access and Transportation Strategic Transport Issues</p>
<p>34. Are there any other specific strategic transport improvements the GNLP should support?</p>

Promoting Healthier Lifestyles, Sustainable Travel Choices and Greater Accessibility to Broadband
35. Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area?
Design Options
36. What approach do you support for promoting good design of new development? Glavenhill consider that Option DE1 to broadly continue with the existing design and density policy approaches with some relatively minor changes and updating is appropriate at this time. There remains a need to promote good design in accordance with existing and emerging National policy. Setting more prescriptive design and density policies should be approached with caution. A flexibly policy is appropriate. Individual site allocation policies may set more prescriptive site specific requirements, based upon a robust assessment of site specific characteristics and potential environmental sensitivities, where relevant.
Housing Minimum Affordable Housing Threshold
37. Which approach to affordable housing thresholds do you prefer? Glavenhill favour option AH2 which requires affordable housing on sites of 11 or more dwellings in line with current and expected Government guidance. Glavenhill object to option AH1 for the same reason.
Application of Affordable Housing Percentage Requirements on Sites
38. What approach do you favour for affordable housing percentages? (refers to options on pg.87) Glavenhill favour a hybrid approach (an amalgamation of AH3 and AH5) that allows for a viability assessment of larger sites to arrive at a deliverable affordable housing figure and a fixed percentage in smaller traditional housing sites (where overall viability will be easier to predict) delivering more than 11 dwellings. This will maximise housing delivery whilst also encouraging the developers of larger sites where infrastructure, finance and phasing costs are higher to deliver.

The obvious problem in the calculations used is that the 2017 SHMA conclusion figure is far too low as it makes no provision for the rolled-up backlog (due the annual failure by the GNGB Councils to hit housing targets) over the JCS Plan period pre-2015; or the City Deal housing numbers that remain an unmet housing commitment agreed with Central Government and now seem to have been lost in the current calculations.

Tenure Split for Affordable Housing

39. Do you support the favoured option for tenure split?

Glavenhill object to the current one-size-fits-all approach to housing tenure types and split as advocated under option AH6. This approach may work with a standard volume housebuilder and/or local developer model however, a degree of flexibility is required to attract housebuilders and ensure delivery.

Rural Windfall, Exception Sites and Small Sites

40. Which approach do you think should be taken to rural windfall and exceptions sites? (refers to options on pg.89-90)

Glavenhill consider that Option AH7 to allow small scale windfall sites adjacent to settlements with development boundaries is appropriate. These sites should be subject to a criteria-based policy to ensure that they are only permitted where they are acceptable in terms of impact on form and character, landscape setting of the village and are immediately adjacent to settlement boundaries.

Housing Mix – Relative Ratios of House Sizes by Bedrooms

41. Which approach to the mix of housing do you support? (refers to options on pg.92)

Glavenhill support option AH10 and object to option AH9 as described on the basis that the market will always dictate housing mix delivery based on a known existing demand within each District. Any attempt to apply a blanket housing mix across the entire Greater Norwich area will only serve to frustrate housing delivery and repeat the mistakes of the past that have resulted in missed housing targets and a rolled-up housing need.

Housing with Care, Extra-Care Housing and Retirement Housing

42. Which approach or approaches to housing for older people and care accommodation do you favour?

Houseboats

43. Which of the reasonable alternatives for houseboats do you favour?

Gypsies and Travellers
44. Which policy approach do you favour to planning for the needs of Gypsies and Travellers?
45. Are there any suitable sites for Gypsy and Traveller accommodation you wish to submit?
Travelling Showpeople
46. Do you support the favoured option for planning for the needs of Travelling Showpeople?
47. Are there any suitable sites for Travelling Showpeople accommodation you wish to submit?
Residential Caravans/Park Homes
48. Do you support the favoured option for residential caravans and park homes?
49. Are there any potential locations for new/expanded residential caravan sites that you wish to propose?
<i>Climate Change</i>
50. Do you support the favoured option for climate change policy?
<i>Air Quality</i>
How Should Air Quality be Covered in the GNLP?
51. Which approach do you favour for air quality? (refers to options on pg.104-5)
<i>Flooding</i>
How Should Flooding and Flood Risk be Covered in the GNLP?
52. Do you support the favoured option for flood risk policy?
<i>Nature Conservation, Green Infrastructure and Habitats Regulation Assessment Mitigation</i>
How Should Nature Conservation and Green Infrastructure be Covered in the GNLP?
53. Which option do you support? (refers to options on pg.111)
Glavenhill supports a variation of option NC1 where specific housing, employment and new garden settlement sites are chosen to deliver large areas of strategic green infrastructure.

54. Do you think any changes should be made to the Green Infrastructure network?
Landscape
Landscape Character and Protection
55. Which of these options do you favour? (refers to options on pg.115)
Strategic Gaps
56. Should the GNLP protect additional Strategic Gaps and if so where should these be?
Energy
57. Should option EN1 be included in the GNLP?
Water
58. Do you support option W1?
Communities
Location of Affordable Housing within Sites
59. Do you support option COM1 for the distribution of affordable housing?
Health Impact Assessments
60. Which option do you support? (refers to options on pg.123)
Neighbourhood Planning
61. Do you support option NP1? If so, which GNLP policies should be “strategic”?
Culture
How Should Culture be Covered in the GNLP?
62. Which option do you support? (refers to options on pg.126-7)
The Broads
63. Do you support option BR1?
Section 7 – Monitoring the Plan

Monitoring of the GNLP

64. Are there any current indicators that should be excluded or included in the GNLP monitoring framework?

Shortfall in Housing Land Supply

65. Which option do you support? (refers to options on pg.131-2)

Glavenhill note the policy Option HLS1 to allow the most appropriate HELAA sites to come forward if there were no 5-year land supply. Glavenhill are concerned that this approach will be difficult to put into practice. If this approach is taken it will presumably be based upon the development hierarchy but how will locations be prioritised between South Norfolk and Broadland in particular? The level of assessment of HELAA sites is minimal and the onus is on the Councils to undertake this rather than the landowner/developer. It will be difficult to prioritise sites based on limited assessment information, in locations where there are multiple sites available. How will this process be undertaken in a fair and transparent way outside of the Local Plan process? It is therefore questionable whether this approach would actually provide a simpler and quicker process than Option HLS2.

Glavenhill consider that Option HLS2 requiring a short, focussed review of the local plan to allocate more deliverable sites is the only reasonable approach because it is fair and transparent. This also places the onus upon the promoter to provide evidence regarding site suitability and delivery. The need for such a review should be kept under continuous review based upon annual monitoring reports. This was the approach recommended by the Inspector in relation to housing shortfall in the Broadland part of the NPA for the JCS and JCS policy 22 was put in place for this purpose, although it is noted this has not been implemented.

Continuing to allow planning permissions on a 5-year land supply basis until the short focussed review has been completed is a reasonable approach and if an appropriate buffer is added to the housing requirement figure during plan preparation (see our response to question 5), then the likelihood of there being insufficient 5 year housing land supply should be minimal in any case.

General Questions

66. Are there any other issues relating to the GNLP you would like to raise?

6. Site Suitability Assessment

The Housing and Economic Land Availability Assessment (HELAA) December 2017 which accompanies the publication of the GNLP, has assessed the suitability and availability of those sites submitted through the Call for Sites exercise for residential development. The assessment comprises a desk-top assessment and advice from a range of technical consultees. It identifies potential constraints to development and/or impacts of development which may need further investigation for each of the sites submitted.

As outlined in earlier sections of these representations, a number of technical assessments have been undertaken across the proposed allocation site covering a range of issues and these are summarised in Section 4 above. These assessments have enabled Glavenhill to draw more detailed conclusions on the suitability of this site for allocation as set out below.

A comparison of the HELAA conclusions for proposed allocation site GNLP0494 against the conclusions of the site specific technical assessments commissioned by Glavenhill, is presented as follows and explained in the remainder of this section:

Constraints Analysis	GNLP Assessment	Lanpro Assessment (on behalf of Glavenhill)
Access	Amber	Green
Accessibility to Services	Amber	Green
Utilities Capacity	Green	Green
Utilities Infrastructure	Green	Green
Contamination and Ground Stability	Amber	Green
Flood Risk	Amber	Green
Market Attractiveness	Green	Green
Impacts Analysis		
Significant Landscapes	Green	Green
Townscapes	Green	Green
Biodiversity and Geo-diversity	Green	Green
Historic Environment	Green	Green
Open space and GI	Green	Green
Transport and Roads	Green	Green
Compatibility with Neighbouring uses.	Green	Green

Access, Transport and Roads

Questions are raised within the HELAA over the ability to create a suitable access into the proposed allocation site. The Transport Assessment and access details submitted in support of the outline planning application demonstrate the ability to achieve a safe point of access into the site from Poringland Road (see **Figure 2** and **Appendix 1**) to the north that is capable in capacity and visibility terms to accommodate up to 54 dwellings.

The County Highway Authority has raised no objection to the proposed access arrangements in response to the application proposals. There are additional opportunities to deliver highway improvement measures, including a slight realignment to Poringland Road and the extension to the footpath to the north of Poringland Road between the site and the Norfolk Homes development, the sufficiency of which has been agreed by the Highway Authority through the outline application process.

Glavenhill contend that the proposed allocation site is entirely appropriate for residential development based upon the ability to provide a safe point of access into the site from Poringland Road and for the existing road network to accommodate the additional traffic movements from the development without the need for significant adaptation.

Accessibility to Services

The proposed allocation site is located on the edge of the Key Service Village of Poringland, which through its location within the settlement hierarchy, is considered capable of accommodating significant additional residential growth. Despite this, the HELAA raises questions over the accessibility of the site.

The planning application documentation has demonstrated the proposed allocation site to be sustainably located within easy walking distance of a range of local services within the village and within easy driving distance of the village of Stoke Holy Cross. These services will benefit from the additional population and footfall to be brought about by the site's development, adding to the vitality and viability of the area.

The development of the site will generate additional Council Tax and would also attract the New Homes Bonus incentive introduced by the Government in 2011 which can be directed towards community initiatives to the benefit of the local population. In this and all other respects, the proposed allocation site's accessibility and contribution towards the improvement of local services both within the village and within easy travel distance of it, is considered good.

Glavenhill contend that the proposed allocation site is entirely appropriate for development based upon its accessibility to services.

Utilities

The colour coded constraints and opportunities table provided within the HELAA suggests no constraints to development based upon utility capacity or infrastructure, however, the supporting text contradicts this suggesting *“it is likely that the sewerage infrastructure network, including the water recycling centre would need to be upgraded”*. The Utility Assessment carried out for the application proposals, demonstrates sufficient capacity at the local water treatment works to accommodate the proposed development.

Anglian Water has been consulted on the application proposals and confirm no objection on the basis of the available capacity.

The proposed allocation site is capable of being served by power and communication networks through the extension of existing provision.

Glavenhill contend that the proposed allocation site is entirely appropriate for development based upon utility capacity.

Contamination and Flood Risk

A Phase 1 Ground Conditions Assessment has been carried out for the proposed allocation site and is submitted in support of the outline planning application. The Assessment confirms that the risk of ground contamination is low. The Council’s Environmental Health Officer does not dispute this conclusion providing no objection to the outline planning application.

The colour coded constraints and opportunities table provided within the HELAA suggests constraints to development based upon the site’s flood risk potential and the supportive text of the HELAA indicates that *“there are small areas at risk of flooding”*. The Flood Risk Assessment (FRA) submitted in support of the outline planning permission confirms that the proposed allocation site falls entirely within Flood Zone 1 and is at limited risk of flooding.

Whilst the ground conditions at the site are not suitable for infiltration of surface water run-off due to the presence of impermeable soil and a poor infiltration rate, a sustainable approach is achievable and includes the storage of surface water in an attenuation basin to the south east of the site and the discharge of water to the local watercourse system at a controlled rate. The Lead Local Flood Authority provide no objection to this solution.

Glavenhill contend that the site is entirely appropriate for development based upon its low risk of ground contaminations and that based upon the additional information provided on flood risk potential as part of the planning application process, there is an appropriate and suitable solution to managing surface water drainage and flood risk at the site.

Market Attractiveness

The site is within single ownership and is being promoted by Glavenhill through the planning application process. It is a deliverable residential development opportunity available in the short term.

Glavenhill agree with the findings of the HELAA in that the site is appropriate for development based upon its deliverability.

Landscape and Townscape

The HELAA confirms that the site is suitable for residential development as a result of it having “*no impact on sensitive landscapes, townscapes or heritage assets*”.

The LVIA submitted in support of the outline application has demonstrated how, through the provision of a substantial landscape buffer to the eastern boundary of the site, the potential impact of development upon landscape character can be effectively mitigated.

South Norfolk’s Landscape Officer does not dispute the findings of the LVIA, notably that the localised adverse effects that may be experienced by users of the adjacent footpath and occupiers of adjacent properties will be reduced over time as the new planting and trees mature.

The HELAA site assessment supportive text confirms that the adjacent woodland would need protection which is not disputed by Glavenhill and is actively supported by the illustrative application proposals.

The HELAA text also states a “*public footpath crosses the site*”. This is incorrect as the PROW (Stoke Holy Cross FP6) falls outwith the proposed site allocation boundary to the east and will not be directly affected by the site’s development.

In this and all other respects, Glavenhill contend that the site is entirely appropriate for allocation for residential development based upon its ability to deliver a well planned extension to the existing settlement with limited material landscape and townscape impacts. The proposed allocation site is acceptable in landscape and townscape terms.

Biodiversity

A series of ecological assessments have been undertaken at the proposed allocation site and have been submitted in support of the outline planning application.

The assessments conclude there to be no realistic potential for impacts to designated nature conservation sites and that impacts to valued habitats will be negligible.

The surveys have identified a population of Great Crested Newts within 250m of the proposed allocation site.

Given the presence of Great Crested Newts locally, and the potential for surrounding land features to provide suitable habitat for other species (not protected under European Legislation), mitigation is necessary to limit any harm from the residential development of the site. Such mitigation may be secured by:

- Obtaining a European Protected Species Licence in order to fence off, trap and translocate any species encountered during the construction phase of any future development.
- Undertaking ground clearance works to avoid main bird breeding season and night time hours.
- The removal and continued maintenance of Himalayan Balsam (a non-native invasive species), the remains of which were found to the south of the site.

The submitted assessments confirm that the development of the site has the potential to significantly enhance the ecological value of the site and its wider area to deliver a positive long-term impact.

As such, Glavenhill agree with the findings of the HELAA in that the site is appropriate for allocation for residential development based upon its biodiversity.

Historic Environment

There are no listed structures within or in close proximity to the proposed allocation site that would be affected by its allocation and development for residential use.

Lanpro has undertaken an archaeological desk-based assessment of the proposed allocation site which is submitted in support of the outline planning application.

The available archaeological records, combined with the results of the analysis of historical mapping, as well as the results of the archaeological geophysical survey undertaken across the site as part of this assessment, suggest that there is low potential for artefact scatters of prehistoric date and agricultural remains relating to outlying field systems of Roman to post-medieval date to be present within the study site. Any such, remains are considered to be of very limited archaeological interest.

There is no evidence to suggest that the proposed allocation site has any potential to contain archaeological remains that would prevent or constrain development.

Glavenhill agree with the findings of the HELAA in that the site is appropriate for allocation for residential development based upon its lack of impact upon the historic environment.

Compatibility with Neighbouring Uses

The illustrative masterplan demonstrates how through the application of appropriate development set back distances the site may accommodate residential development without significant adverse impacts upon the amenity of adjacent residences.

The proposal site is located within a residential area with dwellings bordering the site on two sides. As such, Glavenhill agree with the findings of the HELAA in that the site is appropriate for development based upon its compatibility with neighbouring uses.

Conclusion

Taking account of the updated assessment work undertaken at the proposed allocation site on behalf of land owners and promoters, Glavenhill conclude that the site is entirely **SUITABLE** for allocation and development for residential use when considered against all constraint and impact categories outlined above.

There are no overriding constraints to development that prevent its allocation and delivery in the early stages of the plan period.

7. Conclusions

The proposed allocation site is currently the subject of an outline planning application for residential development.

The proposed allocation site has been demonstrated through the planning application process to be sustainably located on the edge of the Key Service Centre of Poringland and within the Norwich Policy Area. The proposed allocation site is an appropriate and sustainable place to accommodate new housing development.

Contrary to the conclusions of the HELAA the site has been demonstrated through the planning application process to be safely and appropriately accessed from Poringland Road and to have easy access to a range of local services.

In clarification of HELAA constraints and opportunities assessment, the proposed allocation site is not at risk of flooding or contamination and can be accommodated within the capacity of the local sewer network.

By way of summary, there are no overriding constraints that would prevent this site from being developed for housing within the early stages of the Plan Period and Glavenhill respectfully request it be allocated within the emerging Local Plan.

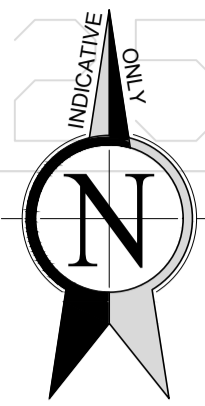
8. Next Steps

Lanpro would welcome the opportunity to discuss the proposed allocation site with the GNGB and to answer any questions that the Board may have on the site's suitability and deliverability on behalf of the land promotor, Glavenhill.



Appendix 1 – Proposed Site Access Plan

302500



302400

302300



SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION BOX
 NOTES: THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE RISK REGISTER PRODUCED FOR INCLUSION IN THE HEALTH AND SAFETY PLAN. THE HAZARDS NOTED ARE IN ADDITION TO THE NORMAL HAZARDS AND RISKS FACED BY A COMPETENT CONTRACTOR WHEN DEALING WITH THE TYPE OF WORKS DETAILED ON THIS DRAWING.

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REV	DESCRIPTION	DATE	BY	AUTH
P17	NOTES ADDED.	07.02.18	DT	LF
P16	FOOTWAY AMENDED, BUS STOP IMPROVEMENTS ADDED.	07.02.18	DT	LF
P15	FOOTWAY EXTENDED, DRAWING SCALE UPDATED AND NOTES AMENDED.	06.02.18	DT	LF
P14	ROAD ALIGNMENT UPDATED AND ROAD CENTRE LINE ADDED.	14.12.17	DT	LF
P13	DRAWING TITLES AMENDED.	08.12.17	GM	LF
P12	DRAWING TITLES AMENDED.	05.12.17	GM	LF
P11	DRAWING AMENDED FOLLOWING HIGHWAYS COMMENTS.	30.11.17	DT	LF
P10	JUNCTION MOVED AWAY FROM OBSTRUCTIONS. FOOTPATH AMENDED TO 1.8m.	15.11.17	DT	LF
P9	HIGHWAYS BOUNDARY AND OS ADDED.	26.10.17	DT	LF
P8	TOPO SURVEY UPDATED AND NORTHERN FOOTWAY EXTENDED.	17.10.17	DT	LF
P7	FOOTWAY EXTENDED ON NORTH-EAST SIDE.	30.08.17	DT	LF
P6	DRAWING UPDATED FOLLOWING SAFETY AUDIT COMMENTS.	25.08.17	DT	LF
P5	VISIBILITY SPLAY UPDATED TO 2.4m x 59m. JUNCTION MOVED 100mm BACKWARDS.	21.08.17	DT	LF
P4	NEW SHARED FOOTWAY/CYCLE PATH UPDATED. EXISTING VERGE & DIMENSIONS ADDED.	20.07.17	DT	LF
P3	VISIBILITY SPLAY UPDATED.	17.07.17	DT	LF
P2	JUNCTION MOVED 400MM FORWARD. VISIBILITY SPLAY AMENDED ACCORDINGLY & EXISTING KERBLINE RELOCATED.	10.07.17	DT	LF
P1	PRELIMINARY ISSUE.	21.02.17	DT	NH

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CLIENT
GLAVENHILL STRATEGIC LAND (No.10) LTD.

PROJECT
LAND TO THE REAR OF 16 PORINGLAND ROAD, UPPER STOKE

TITLE
PROPOSED ACCESS DESIGN

DRAWN	AUTHORISED	DATE	SCALE AT A1
DT		21.02.17	1:500
PROJECT NO.	DRAWING NO.	REV	
161374.6	CL-01	P17	

STAGE:
PRELIMINARY