

Your Ref.: Site Ref. GNLP2091
My Ref.:
Date: 9th December 2018

Mr J E Cogman

Mike Burrell
Greater Norwich Planning Policy Team Manager (GNLP)
County Hall
Martineau Lane
Norwich
NR1 2DH

Dear Sir

Stage B Regulation 18 Consultation – Land West of Norwich Road, Stoke Holy Cross (Site Reference GNLP2091)

I write concerning the above site in conjunction with the current 'Regulation 18' site consultation.

Allied to this the comments below are also equally relevant to the recent public consultation event at The Pavilion, Long Lane, Stoke Holy Cross between 3pm and 7pm on Wednesday 14th November 2018. From correspondence available at the event it is understood that the agent (La Ronde Wright Development and Planning) intend to submit an 'early' outline planning application before the end of 2018.

As resident at Parklands (4 Norwich Road) that is sited opposite the host site I wish to strongly **object** to both the site in conjunction with the Regulation 18 consultation, as well as the emerging premature plans to usurp the Local Plan process via a planning application, and I would be grateful if this letter could be registered as such. For information, I have also sent a copy of this letter to the Agent as a formal response to their recent public consultation event, and the Parish Council who I understand also have considerable concerns regarding the proposals to develop this site.

I note that whilst the agent's consultation website refers to draft proposals for 10 custom build homes, the correspondence available at both the consultation event, and the GNLP Suitability Assessment (GNLP2091) itself, refers to 11 dwellings. These apparent discrepancies raise concern as to the actual quantum of development proposed at this sensitive site.

From the limited information currently available, I note the 'Constraints Analysis' section of the GNLP Suitability Assessment scores all aspects 'green', with no apparent constraints. Given the apparent lack of technical information and supporting evidence at this stage we are very surprised by this conclusion and would question how robust to scrutiny the Suitability Assessment is.

In respect of access and accessibility to services whilst we acknowledge that the site frontage is located within a 30mph zone from my experience of living on this stretch of Norwich Road the actual speeds are considerably higher. The agent's consultation website refers to 70 – 90m visibility being achievable in both directions which accords with the 30mph speed limit. However, without knowing the true speed of traffic at the point of the proposed access onto Norwich Road (we are not aware of any further supporting robust technical information in the public domain) we would suggest that a suitable, safe access cannot be guaranteed. As such access should not be scored 'green' in the Suitability Assessment.

Norfolk County Council's 'Safe, Sustainable Development' (Revised November 2015) provides aims and guidance notes that act as best practice, and is in accordance with the National Planning Policy Framework (NPPF).

This document is very clear on highway access standards, and the requirement to ensure safe vehicular, pedestrian and cycle links to a public highway. At G2.2 it states that "Manual for

Streets" is only applicable for streets with 85th percentile speeds of up to 60kph (37mph). Whilst not yet established, from personal experience we suspect that the actual speed is higher than 60kph (37mph). As such paragraph G2.3 of this document is invoked. In this context, were the recorded speed to be 70kph (43mph) then we understand that an appropriate visibility splay should be 4.5m x 120m. Without this pertinent information we cannot understand how the proposed access can be considered to meet the required standard, and it is respectfully suggested that the 'green' score should be revised accordingly.

Allied to satisfactory access provision, whilst a very limited public transport (bus) service is available via the 84 and 87 services the nearest bus stops are a considerable distance from the host site, at approximately 0.6 miles (opposite the Wilderbeest restaurant) and 0.5 miles (on Long Lane, adjacent Bancroft Close) away. Furthermore, at the Norfolk Bus Forum's annual public meeting (November 2018) the public discussion was dominated by residents from Stoke Holy Cross, angry at bus company Konectbus for withdrawing its bus service in the village. As such, the 87 Konectbus service, which currently runs between Norwich, Poringland and Bungay, will be withdrawn in January 2019. We would suggest that this raises significant concerns over whether the site is truly sustainable, without the use of a private car in order to travel to Norwich and other destinations.

The issue of available adequate infrastructure relative to residential development is particularly pertinent for Stoke Holy Cross in the context of its position in the settlement hierarchy. Policy 15 of the Joint Core Strategy (JCS) identifies Stoke Holy Cross as a Service Village in which land will be allocated for small-scale housing growth, within the range of 10-20 dwellings, subject to form, character and servicing constraints. Notwithstanding this, Stoke Holy Cross has been subject to two significant planning applications for residential development off Long Lane, both of which have received planning permission and are being built out by Hopkins Homes (106 dwellings) and Ingram Homes (24 dwellings). As such, we consider that Stoke Holy Cross has recently received a significant quantum of residential development (130 dwellings) against its 'planned provision', and should receive no more. The matter of adequate, or indeed inadequate services should also be considered in the context that the village shop has also now closed.

The host site is clearly very sensitive in landscape terms, seeing as it is located within the Tas River Valley. This sensitivity is reflected in the 'Tas Rural River Valley' designation, and the specific policy, DM 4.5 ('Landscape Character and River Valleys', South Norfolk Local Plan) as contained within the Development Management Policies Document (October 2015). Indeed, policies for protecting the landscape character of river valleys within South Norfolk have long been an established policy approach in successive development plans (para.5.1.1, South Norfolk Local Landscape Designations Review, Chris Blandford Associates, June 2012).

In accordance with its status the host site currently exhibits a distinctive character and sense of place, enjoying an intact rural character, which is highly tranquil and undisturbed. The emerging proposals for 11 homes will significantly harm the intrinsic character and beauty of this part of the Tas River Valley by effectively enclosing the existing open aspect of the river valley (save for a very small tokenistic viewing area towards the southern-most part of the site adjacent the Church car park), as a result neither contributing or enhancing the natural and local environment, as required by para.170 of the NPPF.

As such, we also consider that development of this site fails to accord with Policy DM 4.5 in that it fails to protect the distinctive characteristics and special qualities of this part of the Tas River Valley, causing significant adverse impact on the distinctive landscape characteristics, and should therefore be resisted from residential development. In essence, we strongly contend that the design approach of creating both essentially full road frontage development, with in-depth development behind, will by implication cause demonstrable significant adverse impacts on the existing distinctive landscape characteristics of this part of the Tas River Valley with the permanent loss of the open landscape character as currently available from the public (i.e. Norwich Road) domain.

In respect of Heritage Assets, both Stoke Holy Cross Parish Church (Grade II*) and a cottage adjacent the site to the rear of properties fronting Norwich Road (Grade II) are located in close proximity to the host land. Given the land's current open and spacious aspect we would

contend that in depth development will affect both listed buildings settings by virtue of removing this special open landscape character, contrary to both Policy DM 4.10 (Heritage Assets), and the NPPF that is a significant material consideration. Furthermore, we would suggest that the proposed in depth, estate style development as indicated at the recent consultation event (and upon the agent's website) represents an uncharacteristic built form, mindful that Norwich Road, in the vicinity of the site, is characterized merely by frontage development consisting of large, open and landscape dominated plots that act as a softening buffer to the open landscape beyond as you travel south along Norwich Road and leave the built form of Stoke Holy Cross.

Whilst we understand that South Norfolk Council has an obligation to provide both a register of those seeking to acquire serviced plots, and to deliver enough suitable self-build and custom housing permissions in conjunction with Right to Build legislation, that should not be at the expense of good planning. Indeed, the Council's Advice Note on proposals for Custom and Self-Build Housing (Revised December 2017) readily acknowledges this; *"in accordance with legislation planning applications must be determined in accordance with the policies of the Development Plan, unless material considerations indicate otherwise"* (para.3.1).

We understand that self-build and custom-build developments are exempt from Community Infrastructure Levy (CIL). The proposed development would therefore provide no wider community, or site-specific benefit to reflect its 'impacts' via a financial contribution, as a market housing unit would be obligated to do. As such this could provide an additional burden on those existing or proposed infrastructure elements that would otherwise be funded in conjunction with the CIL Regulation 123 list. Whilst we note from the material made available at the consultation event stated that, subject to viability, it is anticipated that affordable housing will be delivered off-site by way of a financial contribution, this would normally be provided as part of a s.106 agreement, given that it falls outside of CIL. In essence, beyond the benefit to the eventual occupier of the custom build home, the proposed properties do not appear to mitigate their full infrastructure impact.

In essence, whilst the site is located within the Norwich Policy Area (NPA), irrespective of whether the Council does, or does not have a 5-Year Land Supply of deliverable housing sites we would strongly contend that the host site is inappropriate for residential development as a matter of principle. Whilst the agent's consultation website states that the development site has been significantly reduced following 'careful consideration of the landscape and historical amenity' we would conclude that the site proposals fail to respect the Tas River Valley designation and would cause significant demonstrable harm to it. Whilst the formal proposals for the site appear to be in a state of being developed further, we also currently have significant concerns as to whether the site can be satisfactorily accessed in a safe and sustainable manner as outlined.

In the above context I would therefore respectfully request that the GNLP team (and South Norfolk Council should an 'early' planning application be lodged as indicated) update and amend the Suitability Assessment, and reject this site given that it is encumbered by a number of planning restrictions. We consider that this site, and the emerging proposals, would have adverse impacts that significantly and demonstrably outweigh any perceived benefits of providing merely 11 custom, or self-build dwellings and should be rejected as an inappropriate site and/or refused planning permission in due course.

I'd be grateful if you would confirm receipt of my letter.

Yours faithfully

Mr J E Cogman

cc La Ronde Wright Planning
 Glyn Davies – Stoke Holy Cross Parish
 Council

