

# GNLP Regulation 18 Stage B Consultation Response

## GNLP0420R – Land at Hare Road, Great Plumstead

On behalf of our client, Mr Derek Jones, we strongly recommend that Land at Hare Road, Great Plumstead should be allocated for residential development, comprising 10-15 dwellings.

Initially, our client's entire 10.93ha landholding was submitted as part of the Call for Sites consultation in 2016, and assigned the site reference GNLP0420. However, it was recognised that a large estate development that a landholding of this size could support may not be suitable for the local context of Great Plumstead. Following this, a further representation was made as part of the Stage A Regulation 18 Consultation in March 2018. This representation refined the original Call for Sites submission by reducing the site area to 0.871ha, to demonstrate how a small-scale residential frontage development off Hare Road could be achieved, while addressing any issues raised by the preliminary assessment of the site in the Housing and Economic Land Availability Assessment (HELAA).

Following this revision, the site was assigned a new site reference (GNLP0420R), and subsequently received an updated suitability assessment as part of the October 2018 HELAA Addendum. This representation therefore endeavours to track progress from the initial December 2017 HELAA assessment to the updated October 2018 review, seeks to address any outstanding issues, and considers the implications of the revised National Planning Policy Framework (NPPF, July 2018).

The principle of frontage residential development in this location was established with reserved matters approval for 11 dwellings on an adjacent site of 0.98ha in October 2016 (ref: 20161151). This representation for further frontage development along Hare Road (see attached Plan; Drawing No. B.14,698b) aims to follow the building line of this development, thereby achieving appropriate and proportionate residential development for Great Plumstead.

In support of this representation, a Highways Assessment was undertaken by Orari Transport Planning to demonstrate that safe and suitable access to serve residential development at the site can be achieved. This Assessment is resubmitted alongside this representation.

In accordance with the NPPF's Annex 2 Glossary definitions of 'deliverable' and 'developable', the site is available for housing now, offers a suitable and sustainable location for development now, and it is achievable with a realistic prospect that housing will be delivered on the site within five years. In accordance with the definition of 'developable', it is envisaged that the site could be viably developed.

These points are addressed in further detail below.

### **Assessment of Deliverability**

#### ***Suitable***

Great Plumstead is identified in the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS, 2011) as a Service Village, which can accommodate small-scale housing development, subject to form and character considerations.

The site lies to the north of Great Plumstead, which does not have an adopted Settlement Limit. However, residential development in this location would represent a logical and proportionate extension to the existing settlement.

As mentioned previously, the site has received an updated preliminary assessment of its suitability for residential development in the October 2018 HELAA Addendum. The summary below addresses the planning constraints identified within the HELAA Addendum at Land at Hare Road.

**Access:** **Amber** rated. The Highways Assessment prepared by Orari Transport Planning demonstrates that access can be achieved to serve frontage development on Hare Road. It is envisaged that dwellings would be served by private drives, thereby negating any risk of on-street parking. Furthermore, the site can deliver a 1.8m footpath, built to Norfolk County Council adoptable standards, within our client's ownership. This will serve the proposed development and existing dwellings, thereby providing a significant community benefit, as Hare Road is not currently served by footpaths.

Therefore, we contend that the Highways Authority's objections (Amber rating) to the site needs to be revised to reflect the robust evidence already submitted in support of this site. While Hare Road is 5.5m wide, the development of the site will not reduce the carriageway, and the delivery of the footpath on the side of the development will significantly increase pedestrian safety and connectivity for new and existing residents. Furthermore, the Highway Safety Review included within Orari Transport Planning's Highways Assessment demonstrates that there are no highways safety concerns which would preclude residential development in this location. The recent extant planning consent for frontage development to the south of the site (ref: 20161151) demonstrates that the principle of small scale frontage development in this location is acceptable in respect of highway matters.

From this, it is apparent that the site can be safely accessed from Hare Road, and a footpath can be delivered by using land within our client's control. The site should therefore receive a **Green** rating for access.

**Accessibility to Services:** **Amber** rated. The site is situated within Great Plumstead. The village services include a village shop, village hall with car park, playing field and playground, church, allotments and a bowling green. The village is served by a bus service (KonectBus 5C), which runs through the village along Church Road, providing hourly access between the village and Norwich, Monday-Saturday. All of these services are within walking distance of the site.

The Great Plumstead, Little Plumstead and Thorpe End Garden Village Neighbourhood Plan (2015) identifies accessibility to services in the village as an issue, to be addressed through the enhancement of footpaths, especially along Water Lane, which links Great Plumstead to Little Plumstead. Similarly, Hare Road is not served by any footpaths currently, leading to potentially unsafe pedestrian conditions on the road. To remedy this, the site can accommodate a footpath to serve new dwellings on the site and the existing dwellings along Hare Road, thereby providing an important community benefit.

From this, it is apparent that the site is well related to local services, so the site should therefore receive a **Green** rating for accessibility to services.

**Utilities Capacity:** **Amber** rated. The capacity for utilities services to accommodate any development at the site would be assessed in detail at the planning application stage. Meanwhile, the updated HELAA assessment notes that the availability of utilities remains unclear, but that there is no reason to consider these insurmountable. **Utilities Infrastructure** for the site has received a **Green** rating, suggesting that the infrastructure would be available to serve the proposed development.

**Contamination and Ground Stability:** **Green** rated.

**Flood Risk:** **Green** rated. The site is within Flood Zone 1. Additionally, the Environment Agency's mapping system indicates that the site is not at risk of surface water flooding. A small portion of Church Road is at low/medium risk of surface water flooding, though this is not anticipated to influence the deliverability of the site for residential development.

**Market Attractiveness:** **Green** rated. Great Plumstead is a desirable village, with good connectivity to Norwich and the wider region.

**Significant Landscapes and Townscapes:** **Green** rated. The revision to the red line boundary of the site has been positively received by the Greater Norwich Local Plan team. The updated HELAA assessment notes that 'the site has been significantly reduced in size and scale', and the mirroring of the extent of the built form on Hare Road has been welcomed as a positive landscape benefit, offering an opportunity to present a clear entrance to the village from Hare Road. Because of this, both Significant Landscapes and Townscapes have been promoted from an Amber to a Green rating. We welcome this revision, and urge the Greater Norwich Local Plan team to review other Amber elements raised by this Representation in detail.

**Biodiversity and Geodiversity:** **Green** rated. The site comprises farmland that is in active agricultural use, with low ecological value. The development of the site may result in the partial loss of the tree belt fronting Hare Road. This would enable safe access to the site, and provide land for the installation of footpaths, thereby providing a significant community benefit. Any planning application for the site would be informed by an appropriate arboricultural assessment to determine the health of the tree belt affected by residential development, whilst any scheme would also provide appropriate planting and landscaping.

**Historic Environment:** **Green** rated. The site is not situated within the vicinity of any listed structures or monuments.

**Open Space and GI:** **Green** rated. The development of the site will not result in the loss of any open space. While the development of the site would result in the loss of a portion of the tree belt that borders the site, the existing planning consent to the south of the site confirms the principle of frontage development in this location.

**Transport and Roads:** **Amber** rated. The Highways Assessment prepared by Orari Transport Planning demonstrates that Hare Road is capable of supporting a small frontage development, with no highways safety concerns. The commitment to providing a footpath with the development will enhance accessibility to the wider settlement. Additionally, the inclusion of private drives on site will negate the risk of on-street parking. Meanwhile, the opening of the Norwich Northern Distributor Road has resulted in a significant decrease in traffic on Hare Road, as there is no longer direct access to Rackheath and beyond as the through road at Reeves Corner has been closed.

From this, it is apparent that the local road network is capable of supporting a frontage development on Hare Road, so the site should accordingly receive a **Green** rating for Transport and Roads.

**Compatibility with Neighbouring Uses:** **Green** rated. The site is adjacent a residential area, so an appropriate and proportionate residential development would complement the existing residential uses within the area. The intention to follow the building line of the adjacent consented development will maintain the amenity of existing dwellings and those new dwellings fronting Church Road, once constructed.

From this assessment of the HELAA Addendum it is apparent that there are no planning constraints that would render the site unsuitable for residential development.

### **Available**

The site is within the ownership of Mr Derek Jones, who has instructed Bidwells to submit this representation on his behalf. The site is not restricted by any leases or restrictive covenants. The site is therefore readily available for development.

### **Achievable**

The Greater Norwich Local Plan Regulation 18 Consultation document, released as part of the January-March 2018 consultation, identified, in the analysis of the six growth options, that the allocation of small/medium size sites for residential development is paramount to securing housing delivery in the Plan period to 2036:

*The size of allocations will also be a key consideration. Whilst larger sites can provide new services and facilities, recent experience has shown that they are more difficult to get off the ground. Smaller sites are often more likely to deliver and can support the vitality of existing settlements.*

Since the Stage A Regulation 18 Consultation, the revised NPPF now requires Local Plans to accommodate, through the development plan and brownfield registers, at least 10% of their housing requirement on sites no larger than one hectare (Paragraph 68). This has been implemented to encourage small-scale housebuilders, who can build out sites relatively quickly, and provide more flexibility and choice in the market place.

Land at Hare Road comprises a site of less than one hectare in size (0.871ha), which can be delivered quickly to achieve appropriate and proportionate growth in terms of Great Plumstead's local context. This site would be taken forward by a small-scale housebuilder, and significant weight should be apportioned to its compliance with the revised NPPF in this respect.

Furthermore, the suitability assessment indicated above has demonstrated that there are no site-specific constraints which could threaten the delivery of residential development on the site. Therefore, residential development on the site, of the scale proposed, is deemed to be entirely appropriate, and achievable.

### **Viable**

Development of the site for residential purposes is considered viable, taking into consideration the various known policy requirements in relation to matters such as affordable housing provision and CIL contributions. Should it be required, further evidence on viability can be provided at the appropriate time in the planning process as necessary, in accordance with the NPPF and associated Planning Policy Guidance on Viability (24 July 2018).

### **Summary**

As outlined above, the site is suitable, available, achievable and viable, and is therefore deliverable and developable, in line with the NPPF. The decision to pursue a small-scale frontage development in this location constitutes appropriate, proportionate, thoughtful and well-designed development, in accordance with the objectives of the Great Plumstead, Little Plumstead, and Thorpe End Garden Village Neighbourhood Plan (2014-2034).

It has been demonstrated, with technical evidence, that there are no planning constraints on site that could not be addressed through appropriate mitigation where necessary. Residential development in this location will offer appropriate and proportionate growth in a sustainable location. The allocation will also increase opportunities for small housebuilders, in line with the requirements of the revised NPPF, so the site will be highly deliverable in the short term.

Economically, the site represents the right land in the right place at the right time. The site is relatively well located in relation to Norwich, which provides a variety of employment opportunities for future occupants of the site.

Socially, development on the site would provide CIL payments for infrastructure, and these contributions could be utilised to benefit the local community, in achieving the objectives set out in the Great Plumstead, Little Plumstead, and Thorpe End Garden Village Neighbourhood Plan (2014-2034).

Environmentally, development on the site will have a minor adverse impact on the environment in the form of the loss of a small segment of Grade 1 Agricultural Land. However, this is a small proportion of the original site submitted, and therefore the majority of the site would be retained as Grade 1 Agricultural Land, demonstrating that there will only be a minor impact on the environment.

On this basis, the site should be taken forward as an allocation for residential development in the emerging Local Plan.

I trust the above is of assistance in your selection of sites. Should you have any questions at this stage, please do not hesitate to contact me.

Yours faithfully

Jake Lambert  
**Planner, Planning**