

GNL Regulation 18 Stage B Consultation Response

GNL0441R – Land at Middle Road, Great Plumstead

On behalf of our client, Mr Derek Jones, we strongly recommend that Land at Middle Road, Great Plumstead should be allocated for residential development, comprising approximately 30 dwellings. The site is considered to be entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2036.

Our client owns a landholding in Great Plumstead, displayed with the blue line on the attached site plan (Drawing No. B.14,698a). This site comprises 4.230ha, and the entire landholding was submitted as part of the Call for Sites consultation. 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. To respond to this, a representation was made as part of the January-March 2018 Stage A Regulation 18 Consultation. This revised the red line area of the site down to 1.957ha to create a smaller-scale development between Hare Road and Middle Road, and also sought to address any issues raised by the preliminary assessment of the site in the Housing and Economic Land Availability Assessment (HELAA).

In support of this March 2018 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 to respond to concerns raised by the Highways Authority.

In accordance with the National Planning Policy Framework's (NPPF) definitions of 'deliverable' and 'developable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable.

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-east 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 a preliminary assessment of its suitability for residential development in the updated HELAA. The summary below addresses the planning constraints identified within the HELAA Addendum at Land at Middle Road:

Access: **Amber** rated. To demonstrate that access can be achieved to the site, Orari Transport Planning have prepared a Highways Assessment in support of this representation. The Assessment demonstrates

that suitable access to the site can be achieved from Hare Road and Middle Road to serve frontage development and a potential Mews Court style development. While the exact form and layout of the development is yet to be established, this demonstrates that suitable access can be achieved on site. Minimum 2.4m x 90m visibility splays, in accordance with DMRB, can be achieved.

Therefore, we contend that the Highways Authority's objections to the site need to be both reviewed and revised. It has been demonstrated through Orari Transport Planning's Highways Assessment that minimum visibility splays can be achieved from the site, and that the site is suitable in highways safety terms, with no traffic generation concerns. The design and layout of the site will include a 1.8m width footway, built to Norfolk County Council (NCC) adoptable standards.

From this, it is apparent that suitable access can be achieved to deliver a modest residential development on site. Therefore, the site should receive a **Green** rating for access.

Accessibility to Services: **Amber** rated. The site is situated to the north of Great Plumstead. The village contains 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 and Middle Road are not served by any footpaths currently, leading to potentially unsafe pedestrian conditions on both roads. To remedy this, the site can accommodate 1.8m footpaths to serve new dwellings on the site, and the existing dwellings along Hare Road and Middle Road, thereby providing an important community benefit.

From this, it is apparent that the site is well related to local services, and would engender improvements to the local footpath network. Therefore, the site should 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. The site is undeveloped, and poses no contamination risk, and the site is level.

Flood Risk: **Green** rated. The site is within Flood Zone 1, and the site is not at risk of surface water flooding.

Market Attractiveness: **Green** rated. Great Plumstead is a desirable location within close proximity to Norwich and the wider region.

Townscape: **Green** rated. The updated HELAA assessment notes that the adjacent townscape is not considered to be sensitive to change, and has revised Townscapes from Amber to Green as a result. We welcome this revision, and urge the Greater Norwich Local Plan team to review other Amber elements discussed in this Representation in detail.

Significant Landscapes: **Amber** rated. The reduction in the red line boundary of the site has been acknowledged by the updated HELAA assessment. However, the Significant Landscapes rating for the site remains Amber, with the HELAA assessment contending that the development would create a potentially harsher urban edge to the village.

We contend that the site should be revised to Green. Firstly, the site is not within any special landscape designations. Secondly, the site is bordered by hedgerows fronting Middle Road and Low Road. These hedgerows screen the site from Middle Road and Low Road. These hedgerows would be retained where possible, and they would mitigate any landscape impacts. Thirdly, the revision of the site area engenders a residential development of an appropriate and proportionate scale, which would contain good quality landscaping to establish a soft western edge to the settlement.

Furthermore, the reasoning behind the revision to the Townscape rating from Amber to Green should form a key consideration when revising the Significant Landscapes score for this site, as it has been established that the adjacent townscape is not sensitive to change.

From this, it is apparent that the development of the site would not adversely impact upon landscapes and Great Plumstead's townscape, so the site should receive a **Green** rating.

Biodiversity and Geodiversity: **Green** rated. The site comprises agricultural land, with low ecological value. As mentioned, the hedgerows on site will be retained where possible as part of any residential development. A detailed ecological assessment would be provided at the planning application stage, whilst any scheme would 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 site is in agricultural use, so residential development may include open space and green infrastructure, thereby providing an important community benefit.

Transport and Roads: **Amber** rated. The Highways Assessment prepared by Orari Transport Planning for the site demonstrates that there are no traffic generation or highways safety issues that would preclude the provision of residential development of approximately 30 dwellings on site. Indeed, the proposals would enhance highways safety by providing footpath access from both Hare Road and Middle Road. Additionally, 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 development of the site would not adversely impact upon the local transport network, and would deliver important enhancements. Therefore, the site should receive a **Green** rating.

Compatibility with Neighbouring Uses: **Green** rated. Residential development at the site would complement existing residential uses to the east of the site.

The site comprises Grade 1 Agricultural Land. While residential development on site would reduce Grade 1 land, the decision to revise the red line plan will retain most of the landholding as farmland. Furthermore, Grade 1 land is plentiful in the local area, so the loss of farmland resulting from development in this location would not endanger food security.

From this review of the planning constraints identified within the HELAA Addendum assessment, it has been demonstrated that Land at Middle Road does not contain any planning constraints that would preclude the site from providing a suitable location for residential development in the Plan period to 2036.

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 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) to seek to provide more flexibility and choice in the market place.

While Land at Middle Road comprises a land area greater than 1 hectare (1.957ha), the site can be considered as a medium-sized site, which can be delivered quickly to achieve appropriate and proportionate growth in terms of Great Plumstead's local context.

Furthermore, based on the suitability assessment above, it is 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 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. Residential development in this location would represent a logical extension to the existing settlement, providing an appropriate, 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).

The Highways Assessment prepared by Orari Transport Planning demonstrates that a suitable access can be achieved onto Middle Road and/or Hare Road to serve a residential development.

The only planning constraint that cannot be mitigated through development is the loss of a portion of Grade 1 farmland. As discussed, the revision of the red line boundary means that most of the Grade 1 farmland within the landholding will now be retained. Furthermore, the allocation of this site for approximately 30 dwellings could satisfy Great and Little Plumstead's entire housing need in the Plan period to 2036. This would focus development in Great Plumstead to one site, thereby reducing the risk of residential development in less suitable locations within the parish, while safeguarding larger areas of high quality agricultural land in the local area.

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