



Our Ref: 302760/CH/AW

12th December 2018 Sent by email to: GNLP@norfolk.gov.uk

Dear Greater Norwich Planning Policy Team,

Greater Norwich Joint Local Plan

Site: Land East of Colegate End Road & Land West of Mill Lane, Pulham Market

Site Reference: GNLP2095 & GNLP2096

I write further to the Council's consultation with respect to the Joint Local Plan and in particular to the above site. We hereby submit comments with respect to the above site reference GNLP2095 and site reference GNLP2096 both located in Pulham Market and in response to the Site Proposals Document Addendum New, Revised and Small Sites document and Housing and Economic Land Availability Assessment (HELAA).

On behalf of our client we welcome and support the Council's decision and consideration that the site represents a suitable site for future residential development as identified within the Housing and Economic Land Availability Assessment (HELAA). To supplement this though and address some of the points raised in the site appraisal we would wish to make the following comments.

1. GNLP2095- Land East of Colegate End Road, Pulham Market

Suitability

We would reiterate that the site is suitable for residential development being located adjacent to the village boundary, and built form which continues south westwards into the village. We would

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highlight that within the suitability analysis none of the potential impacts or constraints cannot be overcome or mitigated against.

We note the initial feedback from the Highways Authority with respect to the suitability of the local highway network. However, we would highlight that the road geometry, width and characteristics of Colegate End Road are not uncommon within the rural area and indeed help form the distinct character of the many rural villages within the district. Any development coming forward could be designed to provide for localised improvements to the highway along the site frontage and vicinity of the site. We would also highlight that the amount of development indicated for the site remains relatively small and could be allocated to up to 10 dwellings. Following mitigation and limited the additional traffic levels generated by the development it is contended that the development of the site would not compromise the operation of the highway network.

We would highlight that there is only a relatively small part of the site that is at low risk of surface water flooding (between 0.1% and 1%) of surface water flooding as identified on the Environment Agency Long Term Flood Risk Map. The dwellings can be located to avoid this if necessary and there is nothing to indicate that a standard approach to landscaping and SUDS techniques would not be able to mitigate for any potential impacts of site and minimise risk on and off site. Therefore, this would not be a constraint on development.

The other important considerations relating to biodiversity, heritage and townscape implications can all be mitigated for through a sensitive approach to the design of the site. This would not be a constraint on development and this matter can be suitably addressed by requirements set out in the policy allocation requiring any development be informed by suitably detailed Heritage Assessment and contextual analysis

With respect to the provision of sewerage and main water supply there is nothing at this stage that would indicate that these cannot be provided whether this be through on site private treatment measures or improvements to existing infrastructure. We also contend that this is a very realistic and attractive site to come forward being located in a semi-rural location, adjacent to the existing village, within walking distance to the various facilities in the village, and within close proximity to the A140. Therefore, the site represents a very suitable site for development to be included in the emerging plan.

<u>Availability</u>

We also take the opportunity to reiterate that the site is available and owned by our client and there are no known legal restrictions to bringing the site forward in the short term and indeed that would prevent an immediate delivery of new homes.

Achievability

We would highlight that the site is available now in freehold ownership of our client and there are no technical, legal, or viability constraints that would not prevent it from being developed within years 1 - 5.

2. GNLP2096 - Land West of Mill Lane, Pulham Market

Suitability

We note that a number of the conclusions with respect to this site are similar to those raised with respect of site GNLP2095 above. Again we would reiterate that none of the potential impacts or constraints within the suitability analysis cannot be suitably addressed, and therefore the site is suitable for residential development. The site is located adjacent to the village boundary and to modern estate development at Mill Close and Jocelyn Close immediately to the south and east of the site. The proposals represent a sympathetic and logical extension to the built form of the village.

Again, we note the initial feedback from the Highways Authority with respect to the local road network. However, we would highlight that immediately due southwest of the site frontage is a wide section of Mill Lane that has been subject to improvements including carriageway widening and footpath provision provided as part of the recent development at Jocelyn Close. The footpath provides a continuous connection to the centre of the village and various facilities within the village. Any development coming forward could be designed to provide for a widened carriageway extending into the site such as seen immediately to the southeast of the site and which could be secured through appropriate wording of subsequent policies.

The other considerations relating to townscape, biodiversity; heritage, and utilities can all be mitigated for through the application and development process. None of these considerations are a constraint on development and fundamental aspects such as access to facilities, flood risk, landscape, and compatibility with adjacent uses are all favourable. Therefore, the site represents a very suitable site for development to be included in the emerging plan.

Availability

We also take the opportunity to reiterate that the site is available and owned by our client and there are no known legal restrictions to bringing the site forward in the short term and indeed that would prevent an immediate delivery of new homes.

Achievability

We would highlight that the site is available now in freehold ownership of our client and there are no technical, legal, or viability constraints that would not prevent it from being developed within years 1 - 5. This is considered realistic for a site which is attractive being located on the edge of an existing village and within close proximity to local amenities including schools, shop and public houses. Indeed this provides for more than adequate flexibility in providing for any necessary improvements to the capacity of any necessary highway and utility infrastructure to serve the development.

Summary

With respect to both site references GNLP2095 and GNLP2096, the applicant welcomes the Council's decision that the sites represent suitable sites for future residential development within the village of Pulham Market. We would stress that there are no fundamental constraints or impacts that cannot be mitigated through the subsequent application and development process. The sites represent an opportunity to provide much needed housing at a proportionate scale and within a location that would support the nearby facilities within the village whilst also minimising wider landscape and townscape impacts. We would therefore welcome your support for the inclusion of the above site in the merging local plan.

Do please feel free to contact me should you have any queries regarding the above.

Yours sincerely

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