

Our Ref: 402996/CH/AW

Sent by email to: GNLP@norfolk.gov.uk

13th December 2018

Dear Greater Norwich Planning Policy Team,

Greater Norwich Joint Local Plan – Regulation 18 Consultation

Site: Land South of Caistor Lane, Poringland & Land North of Stoke Road, Poringland

Site Reference: GNLP2093 & GNLP2094

I write further to the current Regulation 18 consultation with respect to the Joint Local Plan and in particular to the above sites. We hereby submit comments with respect to the above site references, GNLP2093 for Land South of Caistor Lane and GNLP2094 for Land North of Stoke Road, in Poringland 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 sites represent suitable sites and options for future residential development as identified within the HELAA and Site Proposals Document Addendum for New, Revised and Small Sites. To supplement this though and address some of the points raised in the site appraisal we would wish to make the following comments.

1. GNLP2093 – Land South of Caistor Lane, Poringland

Suitability

We would reiterate that the site is suitable for residential development being well related and located adjacent to the settlement boundary of Poringland and modern residential development to the east which comprises the existing housing allocation policy POR1. As a result the site forms a natural extension to the settlement of Poringland/Framing Earl which has seen similar such growth

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in the recent past. The site is within close proximity to all the services and facilities within Poringland which provide all necessary day to day needs for household occupants. Poringland being a Key Service Centre should therefore be allocated for significant growth in the emerging plan. As the Council note the site is accessible to these facilities and we would also highlight that none of the potential impacts or constraints identified in the HELAA cannot be overcome or mitigated against.

We note that the initial conclusions within the HELAA suitability analysis highlight some concerns raised by the Highway Authority with respect to potential road network issues at the junction of Caistor Lane and Norwich Road. We would highlight that current housing allocation POR1 on the adjacent site to the east has access on to Norwich Road at this junction and it is fully envisaged that a development of the scale envisaged for the site would be accompanied by a series of off-site highway improvements. These would include carriageway widening along the site frontage up to Norwich Road which from initial investigations is achievable within land owned by the applicant and Highway Authority. The necessary visibility splays to the east and west can be provided within land owned by the applicant and the highway authority and similarly a footpath connection can be provided along Caistor Lane to the Norwich Road. Furthermore, any subsequent policy allocation for the site can include requirements for such off site highway improvements to be secured by way of a legal agreement or conditions as necessary.

The HELAA analysis highlights potential constraints include a small part of the site that is at risk of surface water flooding as identified on the Environment Agency Flood Risk Maps. However, this appears to be an error as only a very narrow strip limited to the road edge is at low risk and the site access can be provided whilst avoiding this entirely if this is deemed necessary. The site is also of sufficient size with flexibility in the numbers of dwellings provided on the site to allow for the dwellings to be located outside of any areas at risk. Otherwise, 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 potential impacts on wildlife and biodiversity are not significant and can be suitably surveyed and mitigated through the policy and application process. 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.

The fundamental considerations and impacts relating to transport and access, landscape, biodiversity, heritage and townscape implications can all be mitigated for and made acceptable. We would also highlight that this is a very realistic and attractive site to come forward being located on the edge of the existing village, within walking distance to the various facilities in the village including a schools, playing fields, shops, bus services and employment facilities. 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 settlement 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 infrastructure to serve the development.

2. GNLP2094 – Land North of Stoke Road, Poringland

Suitability

This site sits between current plan allocations POR1 and POR3 which have been allocated for residential and employment development respectively. As a result the site forms a natural infill development and growth site for the settlement of Poringland/Framing Earl which has seen significant growth in the recent past. The site is within close proximity to all the services and facilities within Poringland which provide for all necessary day to day needs for household occupants.

We note that the conclusions and comments within the HELAA and Site proposals Addendum document for this site are very similar to those of site reference GNLP2093 that is discussed above and borders the site to the north. We therefore do not intend to repeat those representations above, but would reiterate that there are no potential impacts or constraints discussed within the suitability analysis cannot be suitably addressed, and therefore the site is suitable for residential development.

With respect to transport and access we particularly note the initial comments of the Highways Authority that they support the site subject to the provision of an extension to the cycle network. We would fully envisage that a development of this site would come forward with a package of off-site highway improvements which for instance may include but not limited to footpath and cycleway improvements; signage and signalling improvements, junction and carriageway widening that would be necessary. Indeed the site will be subject to further in depth highway studies as part of the plan making process and any subsequent policy allocation for the site can include requirements for such off site highway improvements to be secured by way of a legal agreement or conditions as necessary.

We note that only a small part of the site along the southern boundary is at risk of surface water flooding as identified on the Environment Agency Flood Risk Maps. The dwellings could all be located to avoid these areas and therefore not be at risk of flooding. Improvements can be made to the drainage performance of the highway and this part of the site as part of bringing the site forward that would solve these minor surface water drainage issues. Therefore this is not a constraint on development. Otherwise, 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 potential impacts on wildlife and biodiversity are not significant and can be suitably surveyed and mitigated through the policy and application process. 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.

The other considerations relating to townscape, biodiversity; heritage, and utilities can all be mitigated for through the policy allocation and development process. None of these considerations are a constraint on development. Therefore, the site represents a logical infill allocation and natural continuation of the recent growth of Poringland which make it an extremely 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 and incorporates flexibility to deliver any necessary infrastructure to serve the development.

Summary

With respect to site references GNLP21093 and GNLP2094 the applicant welcomes the Council's conclusions that the sites represent suitable sites for future residential development within Poringland. We highlight that there are no fundamental constraints or impacts that cannot be mitigated through the subsequent policy allocation, applications and development process

We would stress that the proposals put forward in contrast to recent speculative applications and individual piecemeal development represent an opportunity to help deliver a plan-led future for Poringland and wider local community. One that addresses the specific existing and future needs of the District and the local community in a sustainable and accessible location and at the same time seeks to minimise the environmental impacts of future development. We would therefore welcome your support for the inclusion of the above site in the emerging joint local plan.

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

Yours sincerely

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