

DATE: 14th February 2020

Our ref: RUT2458 219245



gnlp@norfolk.gov.uk

By email:
martin.ranner@sworders.com

11 Holkham Studios
Longlands, Holkham Estate
Wells-next-the-Sea
Norfolk NR23 1SH

T: 01328 854 400

Dear Sir/Madam,

RE: GREATER NORWICH LOCAL PLAN CONSULTATION – LAND OPPOSITE POST OFFICE LANE, WESTON LONGVILLE, NORWICH, NORFOLK.

We write to respond to the public consultation on the Greater Norwich Local Plan, on behalf of our clients, R.M. Rutterford Farmers & Commercial, who own land opposite Post Office Lane, Weston Longville. The land has not been submitted previously as part of the Housing and Economic Land Availability Assessment (HELAA) December 2017. This submission therefore represents a new additional site for consideration as part of the Stage C Regulation 18 Draft Strategy and Site Allocations Consultation. The site is being promoted for up to 9 new dwellings.

The following documents accompany this submission:

- Consultation Response Form
- Site Location Plan ref: 219245 PL 001
- Indicative Site Layout Plan ref: 219245 PL 100
- Highway Impact Statement Bancroft Consulting.

Site specific details and the sites appropriateness for housing will be outlined in this submission in addition to commenting on the proposed spatial strategy for development.

Policy 1 – The Sustainable Growth Strategy

Q13 – Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?

Table 6 sets out the details of Establishing the Plan's total housing figure. It notes that 7,840 new homes will be provided on sites proposed to be allocated through the GNLP (6,640) and sites for 1,200 new homes will be identified in the South Norfolk Village Clusters Housing Sites Allocation Plan.



Paragraph 162 of the Plan identifies that a contingency site in Costessey could deliver around 1,000 homes and that further sites could be allocated in Wymondham should this prove to be required due to low delivery of allocated housing sites. We suggest that this approach does not comply with the guidance in the NPPF which states in paragraph 23 that:

‘Strategic policies should provide a clear strategy for bringing sufficient land forward.... This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.’

If there is concern that the Plan’s focus on large sites could result in delays to delivery of housing, this should be addressed at the Plan making stage by the allocation of further, smaller sites in the villages; these smaller sites are likely to be more deliverable and such a strategy would provide a greater degree of certainty of delivery.

Q14 – Do you support, object or wish to comment on the approach for housing numbers and delivery?

Table 7 sets out the proposed Housing Growth 2018 – 2038. It notes that the Norwich urban area will see a 29% increase in housing growth, but the village clusters will only experience a 9% increase.

Paragraph 168 of the Plan notes that; *‘a significant proportion of the allocated sites are strategic scale commitments of 1,000 homes plus’*, This reliance on large sites to deliver new homes could result in delays to the delivery of those homes because of the need for significant infrastructure provision to be delivered before the homes can be built and occupied.

Paragraph 164.6 of the Plan notes that 12% of the homes allocated through the Plan are on sites of no larger than 1 hectare and that this complies with paragraph 64 of the NPPF which requires that at least 10% of sites are no larger than 1 hectare. However, we propose that significantly more growth should be distributed to smaller sites in this Plan, to off-set the inevitable delays associated with large scale strategic growth, which forms the majority of the proposed new homes in the Plan.

Distributing a greater proportion of the proposed new homes to smaller sites in and adjacent to the villages will improve the flexibility of the Plan to respond to changing circumstances, and will help to ensure a steady delivery of homes to contribute to the five year housing land supply and throughout the plan period.

Policy 7.4 – Village Clusters

Question 45: Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.

Paragraph 341 states that village clusters are based on primary school catchments, which provide a proxy for social sustainability. It is accepted that primary school catchments can provide one measure of social sustainability. However, to base the housing allocation for each village solely on a single criterion such as the primary school catchments is, we believe, very limiting. The ability of a primary school to accept children from new developments can only ever provide a snapshot in time of an



ever-changing situation. The amount of housing allocated on the basis of this criterion alone also only reflects the existing provision and does not take account of the potential of new housing to fund growth and improvements to the schools, or to any other community facilities, and therefore potentially stymies future growth and could contribute to a cycle of stagnation or decline.

Paragraph 83 of the NPPF states that:

'Planning policies should enable The retention and development (my underlining) of accessible local services and community facilities, such as local shops, meeting places, sports venues, open spaces, cultural buildings, public houses and places of worship.'

We propose that the amount of housing allocated to village clusters is based on a much wider range of criteria, including the existence and absence of community facilities and services, such as a village shop, broadband connection, public house etc, and consideration of the role the village plays in serving other smaller settlements.

As a case in point, despite there being seven distinct settlements within the grouped 'Village Cluster' of Great Witchingham, Lenwade, Weston Longville, Alderford, Attlebridge, Little Witchingham and Morton on the Hill, as the school located within the cluster (Great Witchingham Primary Academy) is located within Great Witchingham, this limits any housing allocations to Great Witchingham itself. Consequently, this means the assessment precludes any housing allocations within any of the other villages that comprise the cluster and, in this sense, the 'Village Cluster' concept is an ineffective designation when determining housing allocations, resulting in limiting housing distribution rather than ensuring it is distributed and shared across the 'cluster'.

The Site

The proposed site comprises a parcel of land of 0.65 hectares in size, which forms part of a larger agricultural field owned by our client R.M Rutterford. Located on the edge of the village, the site fronts Honingham Road, on the opposite side of which are existing residential properties that extend beyond the entire length of the site. Further existing residential properties border the northern boundary of the site, with the southern boundary screened from open countryside to the south by a screen of trees. The larger part of the field outside of the application site boundaries, extends a short distance to the east until it meets a tree lined farm track, which with existing boundary planting encloses the field on all sides.

Availability

R.M Rutterford are the sole owners of the land and it will be available immediately for development. To the best of our knowledge, there are no known physical or legal constraints that would neither prevent nor delay the delivery of housing on site.



Proposal

The proposal is for the site to be allocated with up to nine dwellings, although numbers could be flexible. An indicative layout plan accompanies the submission which depicts a development of nine dwellings comprising a single detached dwelling with the remainder semi-detached, all set back from the highway frontage allowing generous levels of soft landscaping. This mirrors development opposite, which comprises both semidetached and detached dwellings of two-storey construction, although there are some bungalows located to the south of Post Office Lane. The site benefits from an existing field access located centrally on the sites road frontage, although having taken suitable specialist highways advice, vehicular access is proposed from a single point towards the northern end of the site and will serve a single shared access drive to the front of the properties.

Access

The public highway that serves the site, is subject to a 20mph speed limit and also physical traffic calming features in the form of a 'chicane'. A speed survey and Highway Impact Appraisal has been undertaken by commissioned highway consultants, 'Bancroft Consulting' who have produced a statement, which accompanies this submission.

This proposed access has been designed to allow for appropriate visibility splays to be achieved and due regard to the recommendations of the Norfolk County Councils adopted standards and 'Manual for Streets'. The appraisal demonstrates that a satisfactory access arrangement can be delivered to serve the proposed dwelling, in accordance with paragraph 108 of the revised NPPF.

Constraints

The site is located with Flood Zone 1 and so does not fall within an area liable to be at risk of flooding.

There are four Heritage Assets within the village. These are the former Spread Eagle PH (II), 'Church Farmhouse' (II), the War Memorial (II) and 'Church of all Saints' (I). All are located in a relatively concentrated area, within the historic core of the village, approximately between 110 to 160 metres to the north of the site.

However, due to existing built form separating the site and the Heritage Assets, their setting will be unaffected including the views of the Heritage Assets and the space within which they are experienced. Importantly the proposed development will not impact or obscure any distant views of the Grade I church tower.

The agricultural land that forms the site, is Grade 3 and so is listed 'Good to Moderate'. The land can therefore be classified as BMV agricultural land. However, at a modest 0.6 ha in size, the area of agricultural land that would be lost to production would be relatively small. The majority of land in the area, including the remaining part of the field, is Grade 3, and the landowner will continue to farm his land in the local area. Any harm will therefore be minimal and outweighed by the benefits afforded by the provision of new housing to the village, economically, socially and environmentally.



Ecologically, as active arable agricultural land the site is likely to be of limited value in biodiversity terms, and so will not constitute a constraint that will prevent its development.

The development of the site will give rise to no detriment to the landscape. The development facing the road frontage, will visually balance the presence of existing residential development located directly opposite the site. The land itself is well contained by existing tree and hedge planting and so consequently development will not encroach into open land that will impact on any far-reaching views within the landscape. In this sense the development will sit comfortably with the pattern of development that characterises the village, which has an identifiable core, beyond which housing radiates out largely grouped around the main public highway, which links Morton on the Hill to the north and the A47 to the south at Honingham.

The indicative layout of the dwellings has been prepared to minimise any impacts on the existing residential properties located in close proximity to the site in order to ensure that no significant harm is caused to current levels of residential amenity in terms of loss of privacy, outlook, daylight/sunlight etc. The proposed dwellings will impact on the views from the existing dwellings located opposite, with any proposed dwellings visible from these properties. However, with separation distances of between 36 and 50 metres this will ensure that there will be no overbearing impacts or loss of outlook. The northern most indicative dwelling is located closer to 'Hillcrest', although due to angles of view and the orientation of the properties, any impacts will be minimal.

At this early stage, no investigative work has been undertaken looking at utilities, although it is not anticipated that this should pose any problems to such a degree that would preclude the sites future development.

Sustainability

The village is well served for its relatively small size and accommodates a thriving public house, with restaurant and overnight accommodation, in addition to a village church and a modern and active village hall with outdoor sport and playground facilities. In particular the village hall, acts as a community hub for the parishes of Weston Longville, Morton on the Hill and Attlebridge. It houses regular daily events for groups, societies, clubs and community hire including regular 'village cinema'.

Whilst the villages rural location will result on the reliance of the car to access other facilities, taking into account the level of facilities located within the village itself and the benefits afforded by the provision of rural housing, these benefits will outweigh any perceived harm resulting from use of the private car as a result of the development.

Economically, the provision of new dwellings will deliver employment opportunities, albeit on a temporary basis, during the construction period. Research undertaken by the House Builders Federation indicates that for a development of 9 dwellings this will support employment for nearly 30 people, which is likely to be of benefit to the local (district wide) area. Future residents would also aid to assist in sustaining local services in both the village and also within the surrounding villages, in accordance with paragraph 78 of the NPPF.



Socially, in accordance with the NPPF's clear objective to boost the supply of housing nationally, the provision of homes provides a significant public/social benefit, adding to the vitality of the village and those in the surrounding area.

Environmentally, the change of use from arable land to a residential development will result in unavoidable direct change to the landscape resource of the site. However, as discussed previously, due to the relationship of the site with neighbouring existing built form, the sites development will give rise to no significant harm to the character of the locality or wider landscape. Any perceived harm will be outweighed by the social and economic benefits afforded by the provision of housing within the village.

Viability

Our client, the landowner, recognises that there are likely to be policy requirements and Community Infrastructure Levy (CIL) costs to be met and that to the best of our knowledge, there would be no abnormal costs associated with the developing the land that could affect viability.

Summary

We welcome the opportunity to respond to this consultation and to submit our clients land for consideration as a proposed housing allocation for up to nine dwellings. Below, we summarise the key points made in this response:

- The Plan should not rely on unallocated contingency sites – it should allocate sufficient sites to meet the identified housing requirement, and the focus for additional sites should be smaller, village sites, to increase deliverability.
- The Plan relies heavily on the delivery of large, new sites, with only 9% of new growth planned in villages. It would be a more robust approach to allocate a greater proportion of development in the villages, to support their viability and vitality, and to encourage a steady rate of delivery over the Plan period.
- The assessment of capacity for new development in village clusters should not be based solely on village primary school catchments but should assess where there is access to a wider range of local services. The current approach risks limiting village growth rather than exploring opportunities for development and growth of existing services.
- Our client's site can deliver much needed rural housing, which will be of social and economic benefit to the village and local area and to that of the wellbeing and vitality of the village and its community. The sites development is not encumbered by any constraints that could delay or prevent its development and this site can quickly deliver and contribute to new housing within the district in accordance with the provisions of the NPPF.

I would be grateful if you would confirm safe and timely receipt of this representation.



Yours Faithfully

Martin Ranner BA (Hons) PG Dip MRTPI

Director

Direct email: martin.ranner@sworders.com

Encls: