

Proposed Residential Development On land off Bungay Road, Poringland

Submission of Representations relating to Regulation 18 Consultation (Stage C), Greater Norwich Local Plan

on behalf of ESCO Developments Ltd and A & N Bulmer

Ref: 027133

GNDP Site ref: GNL0316

REPRESENTATIONS TO REGULATION 18 CONSULTATION ON THE GREATER NORWICH LOCAL PLAN MARCH 2020

Greater Norwich Local Plan: On land off Bungay Road, Poringland (Ref: GNLP0316)

Introduction

1. The following comments are submitted in support of the suggested allocation on land off Bungay Road, Poringland (ref GNLP0316) for housing.
2. Representations for this site were submitted to the previous Reg 18 Consultations for the Draft Local Plan in March and December 2018.
3. The following Representations both reiterate information already submitted in support of the site, as well as comments on the status of the site in light of the current consultation.

Comments on Draft Local Plan

4. The current Reg 18 consultation identifies the site as 'unreasonable' in the Draft Local Plan. The plan states that the *'site is not considered to be suitable for allocation as development would be intrusive into open countryside to the south of the settlement. It is unclear whether vehicular access to the site would require demolition of a dwelling, and there are concerns about creating a suitable access with an acceptable visibility splay onto the B1332. There is a significant band of surface water flood risk running through the site which could affect the developable area. In addition, high amounts of existing commitments and environmental/ infrastructure constraints limit the potential for additional new housing in Poringland'*

5. It is worth noting that the Draft Local Plan states that it is unclear whether vehicular access to the site would require demolition of a dwelling. We would like to confirm that this is not the case as there would be no demolition required in order to develop the site. A suitable access, with the required visibility, can be provided directly off Bungay. This was shown in the previous submission in December 2018.

6. Policy 7.3 of the Draft Local Plan 'Key Service Centres' identifies the key service centres for the provision of 3,417 homes, around 8% of the proposed housing growth. This reflects the settlement hierarchy and is made up of significant existing commitments, with additional sites allocated through this plan in the locations with the best opportunities for further growth and the fewest constraints.

7. Key Service Centres are those that are considered to have a good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas. This role is intended to continue with development taking place at appropriate levels.

8. Poringland/Framingham Earl as a Key Service Centre has not been identified for further growth. However, with its close proximity to the fringes of Norwich, as well as the services and facilities Poringland contains within its own rights, it is suggested that a development such as this could come forward to help deal with the housing pressures of the Greater Norwich Urban Area.

9. The Draft Plan's assessment of the site has assumed that the entire site will be built on, this was not the case, again, as shown in the Representation submitted in December 2018. The built area was determined after assessing the site for ecology, drainage and landscape, hence the extensive area of open space

Current Proposals

Layout

- 10.** The land proposed for development, measuring approximately 4.92ha, is located south-east of the village, adjacent to existing development.
- 11.** The sketch layout has been designed with a residential element of 54 dwellings, of which 37 would be open market houses and 17 affordable units. The site will also provide an extensive area of open space, landscaping and SUDS.
- 12.** It is intended that vehicular access will be provided from Bungay Road via a simple T junction, within an extended 30mph zone to be moved southward to ensure the safety of the new and existing residents. This would also provide enhanced gateway treatment into Poringland. Good visibility would be available from the proposed access onto Bungay Road in both directions.
- 13.** There is an existing footway on the opposite side of Bungay Road which continues through to the village centre. There is scope to provide a footway along the development frontage to join the existing footway on the eastern side of Bungay Road.
- 14.** There is opportunity for the access track, that runs south of the site, to be improved by either diverting it to the new access or formalising in its current position. Any future application would include access details and a transport statement.



Figure 1 Indicative Site Layout

Constraints Identified through HELAA

15. The HELAA exercise identified the following scores for this site:

Constraints Analysis

Access	Amber
Accessibility to Services	Green
Utilities Capacity	Amber
Utilities Infrastructure	Green
Contamination & Ground Stability	Green
Flood Risk	Amber
Market Attractiveness	Green

Impacts Analysis

Significant Landscapes	Green
Townscapes	Green
Biodiversity & Geodiversity	Amber
Historic Environment	Amber
Open Space and GI	Green
Transport & Roads	Amber
Compatibility with Neighbouring Uses	Green

16. The HELAA analysis classifies the site as being suitable for housing development and indicates that although there are constraints, approximately 2.5ha of the site is considered suitable for the land availability assessment. The following sections address the HELAA points in more detail.

Highways Access

17. Access to the site will be available directly off Bungay Road. There is an ability to provide a footpath immediately adjacent to the highway or it could be incorporated into the proposed development. It is noted that Bungay Road is constructed to a good standard, providing for two-way traffic and benefiting from street lighting. The road provides a direct link to the village centre. The HELAA recognises that a suitable access could be achieved, and that any impact on local roads could be mitigated.

18. Good visibility would be available from the proposed access onto Bungay Road in both directions. The development will seek for the 30mph zone to be moved southward to ensure the safety of the new and existing residents. There is an existing footway on the opposite side of Bungay Road which continues through to the village centre.

19. There is opportunity for the access track, that runs south of the site, to be improved by either diverting it to the new access or formalising in its current position.

Access to Services

20. Poringland is identified by the Draft Local Plan as a Key Service Centre. Poringland contains a range of services including a post office, supermarket, other stores, pubs, restaurants and take-aways, benefiting from two GP surgeries, a dentist, primary school which is within approximately 1.1km of the site, a high school and two community halls. The closest convenience store is located approximately 160m from site entrance. We believe therefore, the location of services and facilities in the village would be readily accessible by foot or bicycle to the proposed site.

21. There are frequent bus services running from the village to Norwich City Centre, Halesworth, Harleston, Southwold, Beccles and Bungay. The closest bus stop is located on The Street, approximately 350m, a 3-minute walk from the proposed access. Services are operated by First (40, 41, X41), which offer at least one bus up to every 15 minutes between Poringland and the City Centre, Monday to Saturday daytimes. Further services are run by Konectbus (87, 88) on a weekday and weekend basis, and Our Bus (86), running services on weekdays.

22. Accordingly, it is considered that the proposed development would benefit from good access to local services, and would accord with local and national planning policies which indicate that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Given their accessibility, existing local businesses and services would be likely to derive support from the development, due to the addition to the local economy of the spending power of new residents. In these respects, the proposal would support the social and economic dimensions of sustainability as defined in the NPPF.

23. It is acknowledged that the site is in a rural location, residents of the proposed development would be reliant to a degree on car travel for their main shopping and leisure trips. However, a number of sustainable transport options would nonetheless be available to access local services, including walking, cycling and public transport.

Local Character

24. The land proposed for development comprises an open field located on the southern edge of the village. The most open views are from the rear elevation of properties along the south western edge, with some views from upper storey windows to the north west. Porch House is surrounded by mature trees within the garden reducing any visual relationship with the site. Further views from the interior of the Poringland are limited by structures and trees.

25. The proposed development will be well related to the village, maintaining a public open space to the southern edge of the field which will soften the approach to the town along Bungay Road. Furthermore, the dwellings are positioned to exploit the parkland views to the east. Vegetation will be enhanced and maintained on the western edge, with the introduction of trees to continue the tree line into the village.

26. A landscape appraisal produced by Greenlight Environmental Consultancy (which formed part of the 2018 Representations) has informed the layout for the site. The site presents an opportunity for enhanced landscaping to this part of the village, providing an attractive gateway on the approach into the village. This has been achieved through the large area of open space to the southern and eastern boundaries of the site. The layout has been designed to retain all of the area to the east as open space with a green link to the area in the middle of the site. These areas will be improved and encouraged as an area of biodiverse open space with open water features, thereby encouraging biodiversity.

27. Consequently, whilst the proposal will inevitably result in a loss of openness, its impact on the landscape setting of the village and the character of the area generally would be limited.

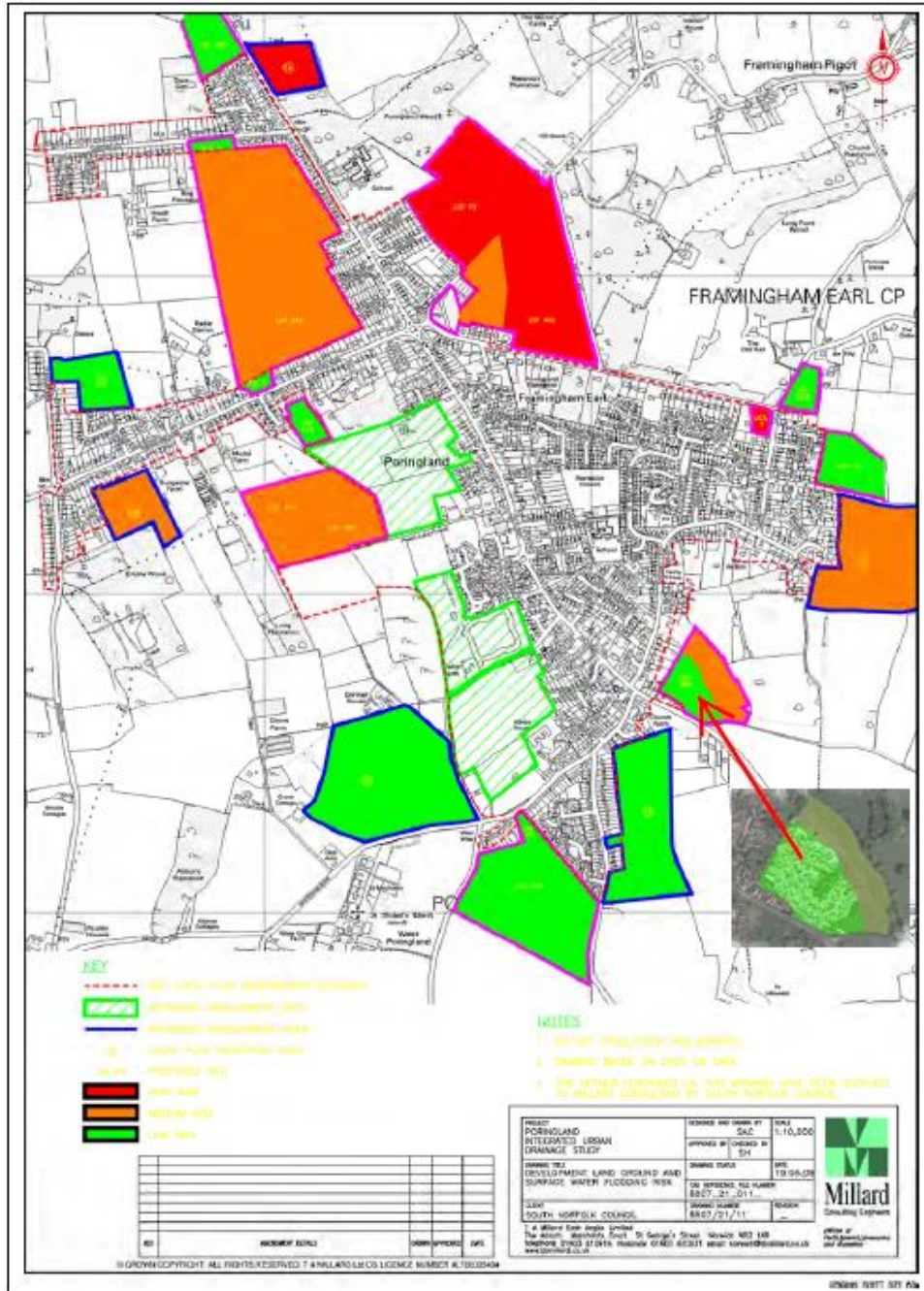
Heritage Assets and Impact on Biodiversity

28. The HELAA assessment makes reference to the ponds and mature hedges and indicates that an ecological survey may be required. The attached report from Hopkins Ecology (submitted previously) confirms that there would be no negative impact on protected species or designated sites. Further detailed ecological surveys and reports would be undertaken as part of any planning application. Additionally, there are several listed buildings nearby. We believe these points can be mitigated against as we develop our proposals for the site.

Flooding

29. The site is at low risk of fluvial and surface water flooding, the majority of the site falls within Flood Risk Zone 1 (low risk). Further technical work, including a site-specific Flood Risk Assessment, will be commissioned to demonstrate that the proposed development would not be a risk of flooding or be likely to result in an increased flood risk elsewhere in the locality. The initial layout shows the provision of a SUDS attenuation area that could be designed with a permanent pond feature for the development, enhancing the current biodiversity.

30. The Poringland Integrated Urban Drainage Pilot Study confirms that this site is suitable for development, extract from report below:



The proposed development sites were assessed on their susceptibility to surface and groundwater flooding, the suitability to provide SuDs and the density of development.

Utilities Infrastructure

31. We do not believe there is any fundamental impediment to the delivery of the site through any constraints relating to utilities infrastructure. The increase in capacity can be built into the new development. The accompanying utilities information demonstrates the site's capacity (attached for your convenience).

Delivery of development

32. No significant infrastructure constraints have been identified to date which would be likely to delay or impede the development of the site for housing. The site is in a single ownership and no further land is needed to enable the land to be brought forward for development. The land is available now for development, and therefore, subject to approval being given, could deliver housing as soon as possible.

33. A developer has been identified (Saffron Housing) to partner with ESCO throughout the Local Plan process and any future planning application. This adds a greater level of certainty in terms of the delivery of the development. The attached letter from Saffron confirms that they are committed to developing the site and that the site can be delivered within the next 3 years.

34. The proposed development would make a positive contribution to the supply of housing in the area and could facilitate improvements to the local utilities capacity. The proposal would also add to the range of housing sites available in the locality, providing flexibility and a wider choice of development opportunities to the market, and thus strengthening the local supply of housing land. By providing sufficient land of the right type in the right place to support growth the development would address the economic dimension of sustainable development, as defined in the NPPF.