

22 March 2018

## **GNL Regulation 18 Consultation Response**

### **GNL0420 – Land at Hare Road, Great Plumstead**

On behalf of our client, Mr Derek Jones, we strongly recommend that Land at Hare Road, Great Plumstead should be allocated for residential development, comprising 10-15 dwellings.

Our client owns a landholding in Great Plumstead, displayed with the blue line on the attached site plan. This site comprises 10.93ha, and the entire area was submitted as part of the Call for Sites consultation in 2016. However, it is 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. This representation therefore aims to revise the red line plan for the site to 0.871ha to create a small-scale residential frontage development off Hare Road, while addressing any issues raised by the preliminary assessment of the site in the Housing and Economic Land Availability Assessment (HELAA).

The principle of frontage residential development in this location was established with reserved matters approval for 11 dwellings on an adjacent site of 0.98ha in October 2016 (ref: 20161151). This representation for further frontage development along Hare Road aims to follow the building line of this development, thereby achieving appropriate and proportionate residential development for Great Plumstead.

In support of this representation, a Highways Assessment has been undertaken by Orari Transport Planning to demonstrate that safe and suitable access to serve residential development at the site can be achieved.

In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', set out in footnote 11 to paragraph 47, 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 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 HELAA. The summary below addresses the planning constraints identified at Land at Hare Road.

**Access:** **Amber** rated. The Highways Assessment prepared by Orari Transport Planning demonstrates that access can be achieved to serve frontage development on Hare Road. It is envisaged that dwellings would be served by private drives, thereby negating any risk of on-street parking. Furthermore, the site can deliver a 1.8m footpath, built to Norfolk County Council adoptable standards, within our client's ownership. This will serve the proposed development and existing dwellings, thereby providing a significant community benefit, as Hare Road is not currently served by footpaths.

From this, it is apparent that the site can be accessed from Hare Road, and a footpath can be delivered by using land within our client's control. The site should therefore receive a **Green** rating for access.

**Accessibility to Services:** **Amber** rated. The site is situated within Great Plumstead. The village services include 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 is not served by any footpaths currently, leading to potentially unsafe pedestrian conditions on the road. To remedy this, the site can accommodate a footpath to serve new dwellings on the site and the existing dwellings along Hare Road, thereby providing an important community benefit.

From this, it is apparent that the site is well related to local services, so the site should therefore 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. **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.

**Flood Risk:** **Green** rated. The site is within Flood Zone 1. Additionally, the Environment Agency's mapping system indicates that the site is not at risk of surface water flooding. A small portion of Church Road is at low/medium risk of surface water flooding, though this is not anticipated to influence the deliverability of the site for residential development.

**Market Attractiveness:** **Green** rated. Great Plumstead is a desirable village, with good connectivity to Norwich and the wider region.

**Significant Landscapes and Townscapes:** **Amber** rated. The Call for Sites submission in 2016 proposed the entire extent of the landholding for residential development. The development of the entire landholding would have a significant impact upon the rural character of Great Plumstead. It is acknowledged that such a scale of development may not be appropriate and proportionate to the settlement, so the red line boundary of the proposed site has been refined to promote a more suitable frontage development along Hare Road, which would maintain the rural townscape of the area.

Given the decision to revise the red line boundary of the site, to deliver a frontage development that is appropriate and proportionate to Great Plumstead's local context, the site should receive a **Green** rating for Significant Landscapes and Townscapes.

**Biodiversity and Geodiversity:** **Green** rated. The site comprises farmland that is in active agricultural use, with low ecological value. As mentioned, the development of the site may result in the partial loss of the tree belt fronting Hare Road. This would enable safe access to the site, and provide land for the installation of footpaths, thereby providing a significant community benefit. Any planning application for the site would be informed by an appropriate arboricultural assessment to determine the health of the tree belt affected by residential development.

**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 development of the site will not result in the loss of any open space. While the development of the site would result in the loss of a portion of the tree belt that borders the site, the existing planning consent to the south of the site confirms the principle of frontage development in this location.

**Transport and Roads:** **Amber** rated. The Highways Assessment prepared by Orari Transport Planning demonstrates that Hare Road is capable of supporting a small frontage development. The commitment to providing a footpath with the development will enhance accessibility to the wider settlement. Additionally, the inclusion of private drives on site will negate the risk of on-street parking.

From this, it is apparent that the local road network is capable of supporting a frontage development on Hare Road, so the site should receive a **Green** rating for Transport and Roads.

**Compatibility with Neighbouring Uses:** **Green** rated. The site is within a residential area, so an appropriate and proportionate residential development would complement the existing residential uses within the area. The intention to follow the building line of the adjacent consented development will maintain the amenity of existing dwellings and those new dwellings fronting Church Road, once constructed.

Additionally, the site falls on land classified as Grade 1 Agricultural Land. The site initially assessed within the HELAA was of a much greater scale, encompassing 10.93ha of farmland. However, the site promoted within this Representation has been revised and comprises a much smaller segment of the landholding, fronting Hare Road. As a result, the vast majority of the landholding would be unaffected by development, and would be retained as Grade 1 Agricultural Land.

From this, it is apparent that there are no planning constraints that would render the site unsuitable for residential development.

#### **Available**

The site is within the ownership of one family. All members of the family have consented to the promotion of this site through the Greater Norwich Local Plan process. The site is not restricted by any leases or restrictive covenants. Therefore, the site is available for development.

#### **Achievable**

The Greater Norwich Local Plan Regulation 18 Consultation document identifies, 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.*

Land at Hare Road comprises a smaller site, which can be delivered quickly to achieve appropriate and proportionate growth in terms of Great Plumstead's local context. Furthermore, the recent draft

consultation of the National Planning Policy Framework (NPPF) requires Local Planning Authorities to ensure that 20% of all allocated sites for residential development comprises half a hectare or less, to encourage small-scale housebuilders, who can build out sites relatively quickly. As this site comprises a marginally larger area of 0.767ha, this site would be taken forward by a small-scale housebuilder, and it should be considered favourably in line with the revised NPPF.

Furthermore, the suitability assessment above has 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, of the scale proposed, is deemed to be entirely achievable.

### ***Viable***

Development of the site for residential purposes is considered viable, taking into consideration the various policy requirements in relation to matters such as affordable housing provision and CIL contributions. Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary at the appropriate time in the planning process.

### **Summary**

As outlined above, the site is suitable, available, achievable and viable, and is therefore developable. The decision to pursue a small-scale frontage development in this location constitutes appropriate, thoughtful and well-designed development, in accordance with objectives of the Great Plumstead, Little Plumstead, and Thorpe End Garden Village Neighbourhood Plan (2014-2034).

It has been demonstrated, with technical evidence, that there are no planning constraints on site that could not be addressed through appropriate mitigation where necessary. Residential development in this location will offer appropriate and proportionate growth in a highly sustainable location. The allocation will also increase opportunities for small housebuilders, in line with the goals of the recent consultation draft of the revised NPPF, so the site will be highly deliverable in the short term.

Economically, the site represents the right land in the right place at the right time. The site is relatively well located in relation to Norwich, which provides a variety of employment opportunities for future occupants of the site.

Socially, development on the site would provide CIL payments for infrastructure, and this money could be utilised to benefit the local community, in achieving the goals set out in the Great Plumstead, Little Plumstead, and Thorpe End Garden Village Neighbourhood Plan (2014-2034).

Environmentally, development on the site will have a minor adverse impact on the environment in the form of the loss of a small segment Grade 1 Agricultural Land. However, this is a small proportion of the original site submitted, and therefore the majority of the site would be retained as Grade 1 Agricultural Land, demonstrating that there will only be a minor impact on the environment.

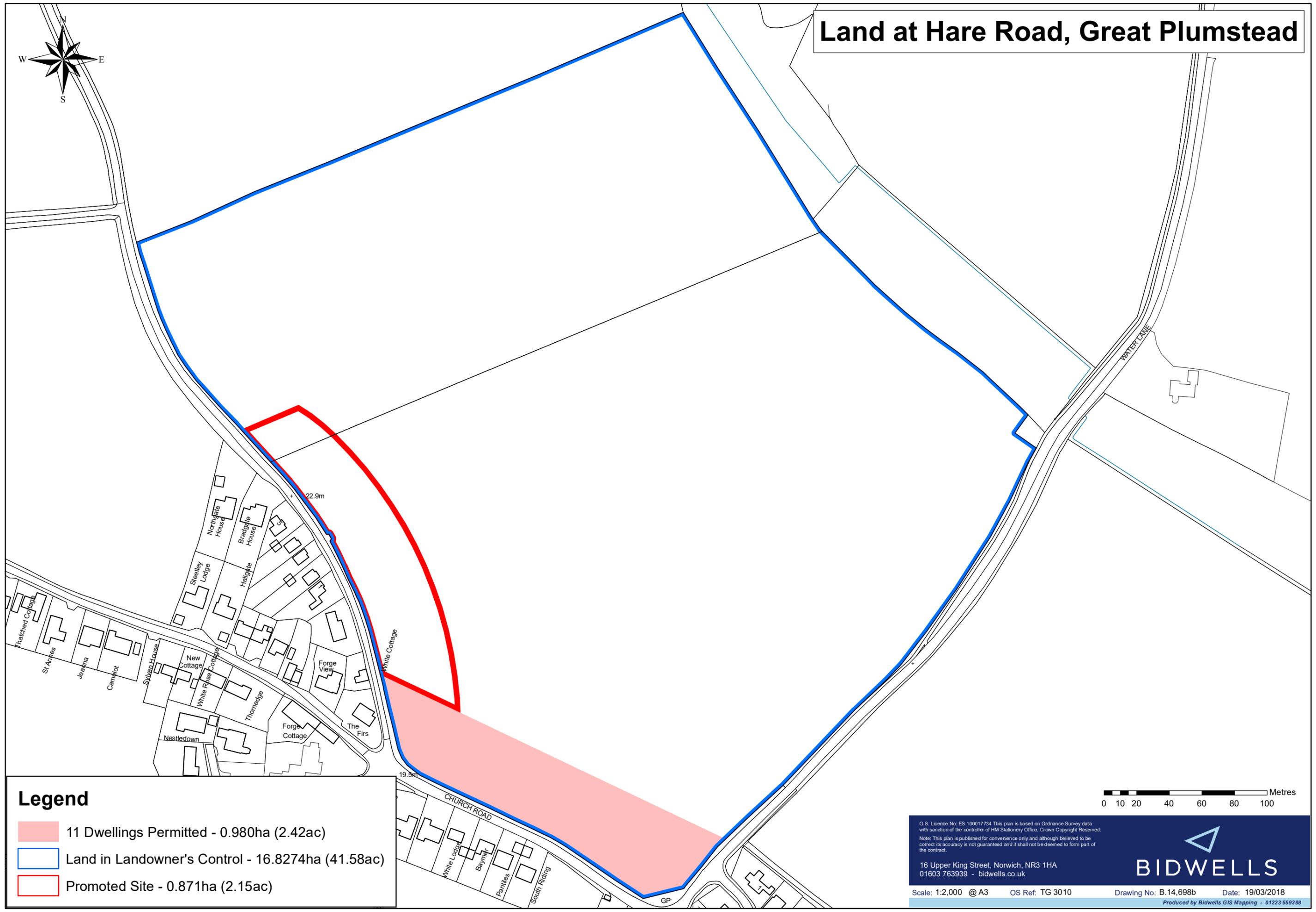
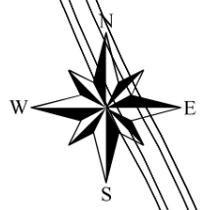
On this basis, the site should be taken forward as an allocation for residential development in the emerging Local Plan, and would represent sustainable development.

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# Land at Hare Road, Great Plumstead



**Legend**

- 11 Dwellings Permitted - 0.980ha (2.42ac)
- Land in Landowner's Control - 16.8274ha (41.58ac)
- Promoted Site - 0.871ha (2.15ac)



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