

22 March 2018

## **GNL Regulation 18 Consultation Response**

### **GNL0441 – Land at Middle Road, Great Plumstead**

On behalf of our client, Mr Derek Jones, we strongly recommend that Land at Middle Road, Great Plumstead should be allocated for residential development, comprising approximately 30 dwellings. The site is considered to be entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2036. The site was submitted previously as part of the Call for Sites consultation in 2016.

Our client owns a landholding in Great Plumstead, displayed with the blue line on the attached site plan. This site comprises 4.230ha, and the entire landholding was submitted as part of the Call for Sites consultation. 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 1.957ha to create a smaller-scale development between Hare Road and Middle Road, while addressing any issues raised by the preliminary assessment of the site in the Housing and Economic Land Availability Assessment (HELAA).

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-east 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 Middle Road:

**Access:** **Amber** rated. To demonstrate that access can be achieved to the site, Orari Transport Planning have prepared a Highways Assessment in support of this representation. The Assessment demonstrates that suitable access to the site can be achieved from Hare Road and Middle Road to serve frontage development and a potential Mews Court style development. While the exact form and layout of the

development is yet to be established, this demonstrates that suitable access can be achieved on site. Minimum 2.4m x 90m visibility splays, in accordance with DMRB, can be achieved.

From this, it is apparent that suitable access can be achieved to deliver a modest residential development on site. Therefore, the site should receive a **Green** rating for access.

**Accessibility to Services:** **Amber** rated. The site is situated to the north of Great Plumstead. The village contains 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 and Middle Road are not served by any footpaths currently, leading to potentially unsafe pedestrian conditions on both roads. To remedy this, the site can accommodate footpaths to serve new dwellings on the site, and the existing dwellings along Hare Road and Middle Road, thereby providing an important community benefit.

From this, it is apparent that the site is well related to local services, and would engender improvements to the local footpath network. Therefore, the site should receive a **Green** rating for accessibility to services.

**Utilities Capacity and Utilities Infrastructure:** **Green** rated. It is anticipated that local utilities infrastructure has capacity to accommodate residential development in this location.

**Contamination and Ground Stability:** **Green** rated. The site is undeveloped, and poses no contamination risk, and the site is level.

**Flood Risk:** **Green** rated. The site is within Flood Zone 1, and the site is not at risk of surface water flooding.

**Market Attractiveness:** **Green** rated. Great Plumstead is a desirable location within close proximity to Norwich and the wider region.

**Significant Landscapes and Townscapes:** **Amber** rated. The site is not within any special landscape designations. The site is bordered by hedgerows fronting Middle Road and Low Road. These hedgerows screen the site from Middle Road and Low Road. These hedgerows would be retained where possible, and they would mitigate any landscape impacts. Furthermore, the revision of the site area engenders a residential development of an appropriate and proportionate scale in terms of Great Plumstead's scale.

From this, it is apparent that the development of the site would not adversely impact upon landscapes and Great Plumstead's townscape, so the site should receive a **Green** rating.

**Biodiversity and Geodiversity:** **Green** rated. The site comprises agricultural land, with low ecological value. As mentioned, the hedgerows on site will be retained where possible as part of any residential development. Detailed ecological assessment would be provided at the planning application stage.

**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 site is in agricultural use, so residential development may include open space and green infrastructure, thereby providing an important community benefit.

**Transport and Roads:** **Amber** rated. The Highways Assessment prepared by Orari Transport Planning for the site demonstrates that there are no traffic generation or highways safety issues that would preclude the provision of residential development of up to 30 dwellings on site. Indeed, the proposals would enhance highways safety by providing footpath access from both Hare Road and Middle Road.

From this, it is apparent that the development of the site would not adversely impact upon the local transport network, and would deliver important enhancements. Therefore, the site should receive a **Green** rating.

**Compatibility with Neighbouring Uses:** **Green** rated. Residential development at the site would complement existing residential uses to the east of the site.

The site comprises Grade 1 Agricultural Land. While residential development on site would reduce Grade 1 land, the decision to revise the red line plan will retain most of the landholding as farmland. Furthermore, Grade 1 land is plentiful in the local area, so the loss of farmland resulting from development in this location would not endanger food security.

From this review of the planning constraints identified within the HELAA assessment, it has been demonstrated that Land at Middle Road does not contain any planning constraints that would preclude residential development, and forms a suitable location for residential development in the Plan period to 2036.

#### **Available**

The site is within the ownership of Mr Derek Jones, who has instructed Bidwells to submit this representation on his behalf. The site is not restricted by any leases or restrictive covenants. Therefore, the site is therefore 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 Middle 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, based on the suitability assessment above, it is 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 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 deliverable. Residential development in this location would represent a logical extension to the existing settlement, providing an 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).

The Highways Assessment prepared by Orari Transport Planning demonstrates that a suitable access can be achieved onto Middle Road and/or Hare Road to serve a residential development.

The only planning constraint that cannot be mitigated through development is the loss of a portion of Grade 1 farmland. As discussed, the revision of the red line boundary means that most of the Grade 1 farmland within the landholding will now be retained. Furthermore, the allocation of this site for up to 30 dwellings could satisfy Great and Little Plumstead's entire housing need in the Plan period to 2036. This would focus development in Great Plumstead to one site, thereby reducing the risk of residential development in less suitable locations within the parish, while safeguarding larger areas of high quality agricultural land in the local area.

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 Middle Road, Great Plumstead

