Greater Norwich Local Plan: Regulation 18 Consultation General Response Form

Thank you for responding to the Regulation 18 consultation on the emerging Greater Norwich Local Plan. If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email qnp@norfolk.gov.uk

It is easier to respond online at www.gnlp.org.uk . If you cannot do this, please use this form to respond to the:

- Growth Options document there are 66 questions covering the Vision and Objectives, Strategy and Topic Policies. There is no need to answer all the questions – just respond to those you are interested in;
- Site Proposals document for commenting on submitted sites and development boundaries (you'll need the Site Submission form to submit additional sites);
- Interim Sustainability Appraisal;
- Evidence Base.

All documents are available from www.gnlp.org.uk

Hard copies of the documents are available at consultation "Deposit Points" at:

- o County Hall, Martineau Lane, Norwich (main reception);
- o City Hall, St Peters Street, Norwich (2nd floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

Submitting your Response Form

Responses should be made electronically on the webform which is available at www.gnlp.org.uk. Alternatively this response form can be downloaded and submitted by email to gnlp@norfolk.gov.uk

Completed hard copy forms can also be sent to:

Greater Norwich Local Plan Team PO Box 3466 Norwich NR7 7NX

All submissions should be made on or before 5pm on Thursday 22 March 2018.

Please note that anonymous submissions cannot be accepted.

Landowner Detail : Mr & Mrs Bulmer

C/O Agent

Agent Details		
7.90 2 0.0		
Title	Ms	
First Name	Lydia	
Last Name	Voyias	
Job Title (where relevant)		
Organisation (where relevant)	Savills (UK) Ltd	
Address	Unex House	
	132-134 Hills Road	
	Cambridge	
Post Code	CB2 8PA	
Telephone Number	01223 347 269	
Email Address	<u>Ivoyias@savills.com</u>	

Please make your comments below. Please use a separate form if you are commenting on more than one document. Please clearly state the paragraph and page number your comments refer to.

Document (please tick as appropriate)				
Growth Options consultation document	Site proposals consultation document	Interim Sustainability Appraisal		
		, , , , , , , , , , , , , , , , , , , ,		
Evidence Base	Caravans and Houseboats			
	Employment, Town Centres and Retail Study			
	Habitats Regulation Assessment (HRA)			
	New Settlements Topic Paper			

Evidence Base	Strategic Flood Risk Assessment (SFRA) ¹	
	Strategic Housing Market Assessment (SHMA)	
	Viability Study	
	Housing and Economic Land Availability Assessment (HELAA)	Please respond to the Site Proposals document quoting the site reference number if you have comments to make on individual site summaries or on the HELAA process

Comments (please clearly state the paragraph and page number your comments refer to). You can respond to as many questions as you wish below, but if you are responding to more than one document, please submit a separate form for each document.

<u>Introduction</u>

These representations have been prepared by Savills (UK) Ltd on behalf of Mr & Mrs Bulmer in respect of 'Land North of Bungay Road, Poringland' which is promoted for residential allocation.

Poringland

The adopted Joint Core Strategy for Broadland, Norwich and South Norfolk classifies Poringland as a 'Key Service Centre' (policy 14). Poringland is considered to be suitable to accommodate additional residential development.

The adopted South Norfolk Site Specific Allocations Policies Document states at page 97 that Poringland/Framingham Earl has access to "a wide range of facilities". The 'Options Document' states at page 259 that these services include: "post office, supermarket, other stores, pubs, restaurants and take-aways, two GPs, a dentist, a primary school, a high school, two community halls, and some local employment".

It is noted that Poringland was originally a linear settlement focused at the Street. In recent years the settlement has been extended to the east, west, and north as a result of modern estate and infill development. It is considered that the settlement can support additional sustainable development, in addition to that currently allocated.

¹ Please note that whilst a hard copy the main SFRA document is available at the Deposit Points, the remaining documents (maps etc.) are only available online – follow the links from here)

GNLP 0316 - Land at Bungay Road, Poringland

In response to the Call for Sites, 'Land North of Bungay Road, Poringland' was submitted for consideration for residential allocation in the emerging Local Plan.

The site has been assessed as part of the Greater Norwich Housing and Economic Land Availability Assessment (HELAA) and given the reference: 'GNLP 0316 – Land off Bungay Road'. The HELAA has assessed the site and found it to be suitable for residential development. We support this conclusion.

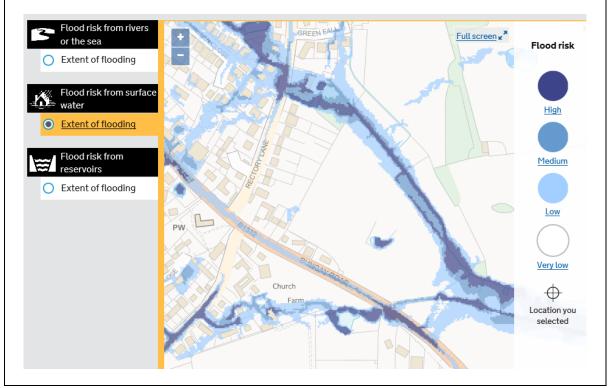
<u>Accessibility to Services</u>: Within the 'Options Document' it is noted for Poringland "allocations in the last two local plans have not promoted further linear growth" (page 259). It is considered that this approach should be reviewed.

The existing village centres of Poringland remain at The Street (as identified on the adopted Policies Map). Full consideration should be given to additional development to the south of Poringland, specifically at Land North of Bungay Road. As acknowledged within the HELAA, the site "is adjacent to existing housing and with good access to services".

<u>Access, Transport and Roads</u>: The HELAA confirms that "suitable access could be achieved, and any impact on local roads could be mitigated". Support is given to these conclusions.

Flood Risk: The site is located in flood zone 1, the lowest risk of flooding (from rivers).

In terms of surface water flooding, the majority of the site is at very low risk (less than 0.1%) although it is acknowledge there is a strip of land which is prone to increased levels of surface water flooding as identified on the Government's Flood Risk Mapping Tool (extract provided below).



A detailed Flood Risk and Drainage Strategy for the site would inform the residential capacity of the site although it is considered the northern strip of land prone to surface water flooding could be incorporated as part of the public open space and sustainable urban drainage systems at the site; as such the site should not be reduced in size without the benefit of such supporting technical evidence.

<u>Biodiversity:</u> There are no Sites of Special Scientific Interest or Special Protection Areas in close proximity to the site. It is considered that the existing hedgerows and trees at the site can be retained as part of the development proposals. It is acknowledged that a 'Preliminary Ecological Appraisal' and necessary site surveys would need to accompany any planning application at this site.

<u>Historic Environment:</u> The HELAA notes that there are several Listed Buildings in proximity to the site. These include the Church of All Saints, cottages and a farmhouse. Adjacent to these Listing Buildings are more modern residential properties. It is acknowledged that a Built Heritage Statement would need to accompany any planning application at this site.

<u>Utilities Capacity:</u> The HELAA has identified that sewerage infrastructure network, including the water recycling centre, would need to be upgraded. It is the requirement of the Utilities Operator(s) to respond to the requirements of planned development.

<u>Conclusion:</u> As highlighted above, the impacts of development in this location are not considered insurmountable and can be addressed as part of detailed design solutions for the site. It is reiterated that the 'Land North of Bungay Road, Poringland' is both suitable and available for residential development.

It is considered that residential development can be delivered by a developer within the first five years of the emerging Local Plan period.

Greater Norwich Growth Options Document

1. Do you agree with the draft vision and objectives for the plan below? (page 17)

Yes, specific support is given to visions statements: "growing vibrant, healthy communities" and "to promote the delivery of housing".

9. Housing Growth Options

Poringland is located within the current extent of the Norwich Policy Area and it is considered this designation should be retained within the emerging Local Plan.

Specific support is given to 'Option 6'. This option supports a more balanced approach to growth across the Greater Norwich Area with a focus on both urban growth and dispersal in the rural area.

Page 134 of the 'Options Document' states that a large majority of homes distributed towards Key Service Centres would be directed to South Norfolk, which includes Poringland. Support is given to this approach.

23. Do you agree with the approach to the top three tiers of the hierarchy?

Yes. The top tiers of the settlement hierarchy are as follows: 'Norwich Urban Area', 'Main Towns' and 'Key Service Centres'.

Poringland is a designated 'Key Service Centre' and we support this classification.

26. Do you support a Norwich centred policy area and, if so, why and on what boundaries?

Poringland is located within the current extent of the Norwich Policy Area (NPA) and it is considered this designation should be retained within the emerging Local Plan.

The settlements around Norwich within the NPA benefit greatly from their proximity to Norwich and available services and facilities within the NPA. It is considered that NPA acts as positive tool to encourage sustainable growth.

Norwich is a focus for economic growth and this needs to be supported by a residential growth in accessible and sustainable locations.

The removal of the NPA and omission of any policy would result in growth being less balanced in some places and over focussed in others.

37. Which approach to affordable housing thresholds do you prefer?

Option AH2 - A proportion of affordable housing would be sought on all sites of 11 or more dwellings (or 0.5 hectares or more).

At present there is Government guidance which suggests that local planning authorities should not require affordable housing to be delivered on development sites of 10 homes or less or 5 homes or less in designated rural areas (and only then it is an off site financial contribution). The aim being to encourage the delivery of new homes in rural areas on small sites where financial viability can be more marginal. However, as this is currently only guidance, local planning authorities have had discretion as to whether or not to apply it and have often chosen not to. The draft NPPF seeks to overcome this issue by converting the guidance into Government policy. This is an important distinction, which should provide much needed certainty to landowners and developers and help to boost the delivery of new homes on smaller rural sites.

Please add additional sheets if necessary
Disclaimer
Data Protection and Freedom of Information The Data Controller of this information under the Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:
 to assist in the preparation of the Greater Norwich Local Plan to contact you, if necessary, regarding the answers given in your form
The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.
Declaration
I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name Lydia Voyias	Date 22/03/2018

Greater Norwich Regulation 18 General Response Form

FOR OFFICIAL USEONLY	
Response Number:	
Date Received:	

Your completed form should be returned to the Greater Norwich Local Plan team no later than **5pm** on **Thursday 22 March 2018**.

By email: gnlp@norfolk.gov.uk

Or, if it is not possible submit the form electronically,

By post to:

Greater Norwich Local Plan Team PO Box 3466 Norwich NR7 7NX

Further advice and guidance can be obtained by visiting the Greater Norwich Local Plan website or by contacting the Greater Norwich Local Plan team directly:

Website: www.gnlp.org.uk E-mail: gnlp@norfolk.gov.uk Telephone: 01603 306603