

GNLP 2124: Model Farm, Stoke Holy Cross

Regulation 18 Stage B Consultation Response - December 2018

Background

This Representation has been prepared by Bidwells, on behalf of Poringland Properties Ltd, in response to the Greater Norwich Local Plan Focussed Sites Stage B (Regulation 18) consultation.

On behalf of our client, we strongly recommend that the site is allocated for residential development. As previously demonstrated (GNLP 2124), the site occupies a highly sustainable location, given the local services on offer in Poringland; and proximity to Norwich City Centre. Development on the site would give rise to a variety of social, economic and environmental benefits; helping to achieve the three objectives of sustainable development.

By way of background, the site is adjacent to POR4, which is allocated for approximately 252 dwellings. POR4 is in the process of being developed by Norfolk Homes.

The site has received a preliminary suitability assessment within the October 2018 Housing and Economic Land Availability Assessment (HELAA) Addendum, published as part of the current Regulation 18 consultation. This Representation endeavours to address the potential constraints identified in the HELAA assessment Site Proposals Addendum.

Amendments to the Red Line Boundary

As previously detailed, the site lies adjacent to POR4, which is, in part, being built out by Norfolk Homes.

Poringland Properties Ltd own part of POR4 (to the west of The Ridings) which allows access to be provided off The Ridings to the site. It is envisaged that the remainder of POR4, and this site, would be developed in a holistic manner. On this basis, the red line has been amended to detail one site; incorporating the remainder of POR4 and Site Ref: GNLP 2124.

A plan detailing the revised red line is submitted alongside this Representation (drawing no. TG 2502).

Comments on HELAA Addendum, October 2018

The site has been assessed within the HELAA, with most of the criteria under the suitability assessment achieving green ratings. The following criteria all achieved a **green** rating:

- Accessibility to Services;
- Contamination and Ground Stability;
- Market Attractiveness;
- Significant Landscapes;
- Townscapes;

- Biodiversity and Geodiversity;
- Historic Environment;
- Open Space and Green Infrastructure; and
- Compatibility with Neighbouring Uses.

The following criteria within the HELAA assessment received **amber** ratings. These ratings are explored in further detail below:

- **Access**

As previously detailed in the Regulation 18 Consultation response, the site benefits from being immediately adjacent to the existing site-specific residential allocation POR4. A new access road will be provided to the site via a new connection on the western side of The Ridings; through adopted Development Plan policy POR4. (Poringland Properties Ltd have a right of access over this land). Detail of access are outlined in more detail in the Technical Note prepared by Create Consulting Engineers Ltd, which is submitted in support of this representation.

On this basis, it is evident that the site can be accessed by all means and should be afforded a Green rating.

- **Utilities Capacity**

In accordance with the HELAA Methodology, an amber rating is given to utilities capacity where no available utilities are on the site, but potential exists for improvements to facilitate capacity. We concur with this rating, as no utilities are currently present on the site, but potential to facilitate capacity for development on the site exists. Given the site's close relation to existing dwellings in Poringland, Upper Stoke, and The Ridings, it would be envisaged that utilities would be in place in close proximity to the site, to serve future development.

- **Utilities Infrastructure**

Within the HELAA assessment of the site, the site was given an amber for utilities infrastructure. As detailed in the HELAA Methodology, amber ratings for utilities infrastructure are given when sites have strategic utilities infrastructure passing over it; which may limit development on the site, and affect viability. Whilst the site is within close proximity to a telephone mast, it is recognised that any potential impact of the mast could be suitably mitigated through development of the site.

As detailed on the red line plan submitted within the Regulation 18 Consultation response, there is an undefined ward body which passes across the eastern part of the site, from north to south-east. Therefore, we concur with the rating of amber for utilities infrastructure, as further evidence will be produced in due course as to the nature of the infrastructure. However, given previous experience with ward bodies passing across a site, suitable mitigation measures could be implemented through bringing forward development of the site.

- **Flood Risk**

Whilst the majority of the site is within Flood Zone 1, it is recognised that the eastern boundary of the site is adjacent to areas of predominately low and medium risk of surface water flooding, with small areas being at high risk of surface water flooding. On this basis, we concur with the amber rating for flood risk, as the HELAA Methodology states that an amber rating is given where the site is within an area at low, medium or high risk of surface water flooding. However, it is recognised that potential surface water flood risk could be overcome through development of the site; through suitable mitigation measures (such as a Surface Water Drainage Strategy). Further information on the proposed mitigation measures will be provided during any planning application for the site.

- **Transport and Roads**

The Technical Note prepared by Create Consulting Engineers Ltd and submitted in support of this representation demonstrates that the additional vehicle movements resulting from the proposed development would not lead to a significant impact on the local road network that could not be accommodated by the existing highway infrastructure surrounding the site.

On this basis, it is evident that the development of the site will not have a detrimental impact on the local highway network and should be rated as Green.

Comments on Site Proposals Addendum, October 2018

The Site Proposals Addendum outlines that the site's access, sewerage infrastructure and flood issues would need to be addressed, and the nearby telecoms mast may impact on viability.

As discussed within this Representation, it is recognised that both access and flood issues can be suitably mitigated through development of the site. In relation to sewerage infrastructure, it is recognised that necessary upgrades to the sewerage network could be provided, in order to facilitate development on the site.

Whilst it is recognised that the site is in close proximity to the telecoms mast, it is envisaged that development of the site could be suitably designed to mitigate any potential impact the mast may have on the site. In addition to this, a viability study to demonstrate the deliverability of the site can be provided on request.

Conclusion

The site is suitable, available, achievable and viable, and is deliverable within the first five years of the Greater Norwich Local Plan period. There are no constraints that would prevent the site from coming forward for residential development.

On this basis, the site should be taken forward as an allocation for residential development of 80 dwellings in the emerging Local Plan. Development on the site would meet all three objectives of sustainable development, and would help to distribute housing allocations and delivery across the district.