

GNLP 2176: Land North of Dereham Road, Honingham

Regulation 18 Stage B Consultation Response - December 2018

Background

This Representation has been prepared by Bidwells, on behalf of the Rampton Property Trust, 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 (Ref: GNLP 2176), the site occupies a sustainable location, given the local services on offer in Honingham; and the site's proximity to Longwater Retail Park and 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.

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 Regulation 18 consultation. The assessment concluded that the site was considered suitable, however, a number of potential constraints were identified.

This Representation endeavours to address the potential constraints identified in the HELAA assessment Site Proposals Addendum.

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:

- Utilities Infrastructure
- Contamination and Ground Stability;
- Flood Risk;
- Significant Landscapes;
- Townscapes;
- Biodiversity and Geodiversity;
- 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 detailed within the previous Regulation 18 Consultation, the site benefits from an existing access track from Dereham Road, which serves both the site and an existing dwelling to the west of the site. Existing pedestrian access to the site is in place via an existing footpath which runs along the southern boundary of Dereham Road, providing access to the wider village of Honingham. On this basis, existing pedestrian and vehicular access to the site are available. This is recognised in the HELAA assessment.

However, it is recognised that the existing vehicular access would need to be upgraded through development of the site. Accordingly, we agree with the amber rating for the site, as any access constraints could be overcome through development of the site, through upgrading existing access points.

Additional information detailing the suitability of the existing access to accommodate development of the site will be provided in due course.

- **Accessibility to Services**

The HELAA Methodology recognises that an amber rating is given to accessibility to services where one to three core services are within 1,200m walking distance for non-town centre locations, increasing to 2,000m walking distance for access to schools and employment. Honingham benefits from two core services, including a bus stop which provides peak-time services to a higher order settlement (Norwich City Centre), and being approximately 2415m from Hockering Primary School (only marginally over the 2000m walking distance for primary schools). Therefore, we agree with the site's rating of amber for accessibility to services.

Regardless of the proximity to core services, it is also worth recognising that the site is in close proximity to a range of services which are not defined as core services in the HELAA Methodology. Notably, the site is within walking distance of Honingham Village Hall, a Public House (Honingham Buck), and a car garage. Moreover, the site is in close proximity to a range of existing shops, services and employment opportunities in Norwich City Centre (8.8 miles from the site) and Longwater Retail Park (3.5 miles from the site). These can be accessed by either public or private modes of transport.

In spite of the above, the supporting HELAA suitability conclusions state that there is no access to a school. However, this is incorrect, as nearby Hockering provides a Primary School, which is 1.5 miles from the site. It is also recognised that there are nearby site proposals for significant large-scale developments, which could also provide local services; therefore, also potentially increasing the site's accessibility to services.

In addition, in accordance with the revised NPPF (2018) the development of the site has the potential to enhance or maintain the vitality of the local community. The development of the site will potentially help sustain existing services and by way of the additional population help make new services more viable.

Based on the above, the site is capable of supporting a scale of development that is proportionate to the size of Honingham and the services provided in the village and surrounding area.

- **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 Honingham, it would be envisaged that utilities would be in place in close proximity to the site, to serve future development.

- **Market Attractiveness**

In relation to market attractiveness, the site falls in a sustainable location, providing easy access to key employment and retail areas, such as Norwich City Centre and Longwater Retail Park. Furthermore, the A47 is scheduled to be dualled in 2021, and the Western Link Road (to link the Broadland Northway) will both enhance connectivity and market attractiveness of development of the site. Therefore, we disagree with the amber rating of the site. The site is in a location that is attractive to the market, and consequentially should be afforded a green rating.

- **Historic Environment**

As detailed in the previous Regulation 18 Consultation, the site lies in relative proximity to a range of Grade II Listed buildings, including the Honingham and East Tuddenham War Memorial; 39, 40, and 41 The Street. However, it is recognised that the site is bisected from the heritage assets by existing dwellings, alongside mature hedgerows and vegetation.

Accordingly, given that views of the site from the context of Honingham are restricted, it is recognised that any impact on any heritage assets through development on the site is limited, and could be mitigated through development. On this basis, we agree with the amber suitability rating.

- **Transport and Roads**

In accordance with the HELAA Methodology, an amber rating is given to a site where any potential impact on the functioning of trunk and/or local roads could be reasonably mitigated. We agree with this rating, as development on the site could mitigate any impact on the local road network.

Further information on the proposed mitigation to the local road network will be provided in due course.

Comments on Site Proposals Addendum, October 2018

The Site Proposals Addendum recognises that constraints of the site relate to the lack of nearby services. However, as has been demonstrated above, it is recognised that there are a range of core and additional services both in close proximity to the site, and the wider area (notably, in Longwater Retail Park and Norwich City Centre) which could, in accordance with the NPPF, be both maintained and enhanced by residential development in a rural location. It is also recognised that if a new settlement is developed in Honingham, accessibility to local services will be enhanced.

The Addendum also recognises that development on the site may impact on the townscape. This is a surprising comment, considering that the HELAA Suitability Assessment affords a green rating to the site, which suggests that development of the site would have either a neutral or positive impact, but not a detrimental impact on townscapes. In addition, the supporting HELAA Suitability Conclusions state that there are no sensitive townscapes which development of the site would negatively impact upon. We agree with the rating of green for townscapes, as the site is not in closer proximity to a sensitive townscape (i.e. Conservation Area, National Park, or the Broads Area of Outstanding Natural Beauty). Nor, will development affect a concentration of local Listed Buildings, given that the site is bisected from Listed Buildings in Honingham by a range of mature hedgerows and existing dwellings. Therefore, it is recognised that development will not negatively impact on townscapes.

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 circa 55 dwellings in the emerging Local Plan, or less depending on the scale of development directed to Honingham. If a smaller scale of development is considered suitable for Honingham the site has potential to help the Greater Norwich Local Plan satisfy the requirement of the NPPF that at least 10% of housing requirements are met on sites of 1ha or less.

Development on the site would meet all three objectives of sustainable development, and would help to distribute housing allocations and delivery across the district.