

13 March 2020

Greater Norwich Growth Board

Submitted electronically and by email to LP@s-norfolk.gov.uk

Dear Sirs

Greater Norwich Local Plan Regulation 18, Stage C Draft Strategy and Site Allocations – Land South of Poringland Road, Upper Stoke

Background

The representations are submitted on behalf of Glavenhill Limited to the Greater Norwich Local Plan (GNLP) Regulation 18, Stage C Draft Strategy and Site Allocations Process.

These representations relate to Land South of Poringland Road, Upper Stoke (the allocation site) for which Glavenhill are both landowner and promotor.

The allocation site was previously promoted to the Greater Norwich Local Plan Regulation 18 process as part of the Stage A, Site Proposals and Growth Options consultation in March 2018 (site reference GNLP0494) for up to 54 dwellings (see **Appendix 1** for site boundary).

At the time of making the Regulation 18, Stage A representations, Glavenhill had submitted and was awaiting the determination of, an outline application for the development of the site for up to 54 dwellings.

The representations confirmed with reference to the submitted technical application documentation, that the site was a suitable location for residential development.

The application was later refused with officers considering the development of land outside of the defined settlement limit and in the context of their alleged 5 year housing land supply, to be contrary to local policy. Objection was also raised on the alleged amenity impacts of taking access into the site between two existing residential properties and the 'estate-like' form of the development.

The proposal was later dismissed at appeal with the Inspector concluding that the social and economic benefits that the development would bring would not outweigh the harm that a *"substantial amount of new housing extending beyond the limits established in the development plan and encroaching into open countryside"* would deliver. He also concluded that the number of dwellings proposed would affect the living conditions of those properties that would be located either side of the proposed access road, albeit the noise to be generated by the 54 dwellings would not *"give rise to environmental health concerns and the degree of general harm in respect of this issue would be quite limited"*.

The Greater Norwich Growth Board (GNGB) has assessed the then proposed allocation site and concluded as part of the current Regulation 18, Stage C consultation that:

"This site is not considered to be suitable for allocation due to highways constraints. The access (which involves demolishing an existing property) is narrow. As well as the form of development

caused by the narrow access, and achieving suitable visibility splays, there could be issues over the residential amenity to neighbouring properties. In addition, high amounts of existing commitments and environmental/ infrastructure constraints limit the potential for additional new housing in Poringland.”

These representations respond to these concerns by presenting an alternative, smaller site boundary and development proposition for allocation (see **Appendix 2** for proposed allocation boundary and suggested development area).

Upper Stoke – its Position in the Settlement Hierarchy

The proposed allocation site (see **Appendix 2**) is located within the village of Upper Stoke, which, whilst located within the Parish of Stoke Holy Cross, is physically and functionally linked to the Key Service Centre of Poringland.

It is suggested within the GNLP Regulation 18, Stage C Consultation Document that well-related parts of the villages of Castor St Edmund, the Framinghams and Stoke Holy Cross are to be grouped together and are to be considered collectively as part of the Poringland / Framinghams Key Service Centre. This is highlighted within the Key Service Centres Unreasonable Sites Document which includes an assessment of the proposed allocation site under the Poringland / Framinghams Key Service Centre section.

That said, and somewhat contradictory, a report presented to the South Norfolk Regulation and Planning Policy Committee on 18 February 2020 confirms that South Norfolk intend to designate the Parish of Stoke Holy Cross as a Village Cluster along with the Parishes of Caistor St Edmund and Bixley and Shotesham.

Without any additional clarity over where Upper Stoke will sit within the proposed settlement hierarchy, these representations provide comment to both draft Policy 7.3 (Key Service Centres) and draft Policy 7.4 relating to Village Clusters where relevant and appropriate.

Soundness of Draft Local Plan Policies (draft Policy 1, Policy 7.3 and 7.4)

Key Service Centers such as Poringland / Framingham Earl are identified under draft Policy 1 of the Regulation 18, Stage C Consultation Document as a third-tier settlement, with growth proposed to these areas after the ‘Norwich Urban Area’, and the ‘Main Towns’.

Despite their position in the hierarchy, only 515 new homes are proposed to come forward through new allocations within all nine Key Service Centres. This compares to a minimum of 1,680 homes that are proposed to come forward in the lower (fourth) tier, ‘Village Clusters’.

Glavehill consider it both unsustainable and inappropriate to apportion such a limited number of new homes to the Key Service Centres which it can be assumed, require a meaningful level of investment and footfall to support their current, service provision.

With specific reference to draft Policy 7.3 of the Regulation 18, Stage C Consultation Document, Glavenhill object to the Council’s decision not to allocate any additional sites for residential development within the Poringland / Framingham Earl Key Service Centre. This decision appears to be neither justified or positively prepared, nor to have been sufficiently tested and is therefore

considered 'unsound'. To the contrary, the settlement and its existing services can accommodate additional development such as that proposed under these representations.

Draft Policy 7.4 confirms that 4,024 homes, or around 9% of the total housing growth for Greater Norwich Area across the plan period will be located within village clusters. 1,200 of these homes will be allocated within South Norfolk through their Village Clusters Housing Site Allocations document.

The Policy aims to promote social sustainability by supporting rural life and services through facilitating small scale residential development in village locations such as Stoke Holy Cross. The provision of several relatively small allocation sites is suggested to have the additional benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations. Village clusters within south Norfolk will be based on primary school catchments, which provide a proxy for social sustainability.

Glavenhill consider Stoke Holy Cross and related part of the parish, including Upper Stoke to be an appropriate location for small scale residential growth.

The Proposed Allocation

On review of the Regulation 18, Stage C Consultation Document, and the South Norfolk emerging Village Clusters strategy as set out within the South Norfolk, 18 February 2020 report to Regulation and Planning Policy Committee and the recent appeal decision for large scale estate development at Land South of Poringland Road, Upper Stoke, Glavenhill are submitting a portion of their wider land ownership (see **Appendix 2**) for residential allocation to the current GNLP Regulation 18, Stage C process and as part of the South Norfolk Village Clusters Housing Site Allocations call for sites process.

With reference to the updated proposed allocation boundary and illustrative masterplan enclosed at **Appendix 2**, the site can through its allocation deliver:

- In the order of 20 residential dwellings together with new and supplemented open spaces and boundary landscaping to provide a well-designed development and a logical and defensible limit to the existing settlement.
- 100% bungalows to address locally identified needs for accessible accommodation and a policy compliant amount of affordable homes to assist in addressing local, rural housing needs.
- A site of appropriate scale to be attractive to small to medium sized housebuilders who find it difficult to compete for and deliver larger strategic sites and will provide additional choice to the local housing market.

Overcoming Concerns on Site Suitability

The allocation of the site for a small scale, 100% bungalow scheme will also overcome officers' previous concerns over the site's suitability by:



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- Significantly reducing the number of dwellings that would use the proposed access, thus reducing the number of vehicle movements and concerns over amenity loss from noise and light shine.
- Delivering a small number of units to deliver a development of appropriate form and scale for this village location, moving away from the estate style development proposed previously.
- Limiting dwellings to a single storey will address previous concerns over potential amenity loss to properties located along the Poringland Road frontage.
- Limiting the level of physical incursion into the countryside beyond the existing settlement limit by following the line of development established to the west.
- The access point will continue to meet highway design guidelines with sufficient visibility being achievable in both directions.

The suitability, availability and deliverability of the previously proposed allocation area was confirmed with reference to the Greater Norwich 2017 HELAA assessment criteria in representations made to the Regulation 18, Stage A Consultation process and these conclusions remain appropriate to this smaller site.

Summary and Conclusion

The site has received good interest from local house builders, who offer their support to these representations.

I trust that the above and enclosed is of some assistance to you and your colleagues in concluding the suitability and deliverability of the proposed allocation site.

Yours sincerely

Hannah Smith
Associate Director, MRTPI, AIEEMA



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Appendix 1 – Previous proposed allocation area



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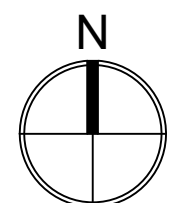
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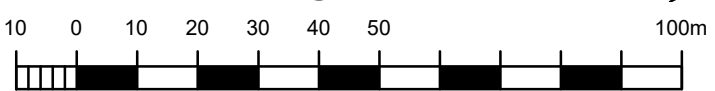
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| PURPOSE OF ISSUE PL - Planning | | | RIBA STAGE 3 |
| DRAWING STATUS S2 - Fit For Information | | | |
| PROJECT TITLE Upper Stoke | | | |
| CLIENT Glavenhill Strategic Land (No.10) Ltd | | | |
| DRAWING TITLE Location Plan | | | SCALE 1:1250@A3 |
| DATE Nov 2017 | DRAWN BY TU | CHECKED BY TU | APPROVED BY HS |
| DRAWING NUMBER | | | |
| PROJECT NO | TYPE | UNIQUE NO | REVISION |
| 0598 | - 00 | - 001 | - |



Licence number LIG0975
Location Plan 1:1250 @ A3



1:1250



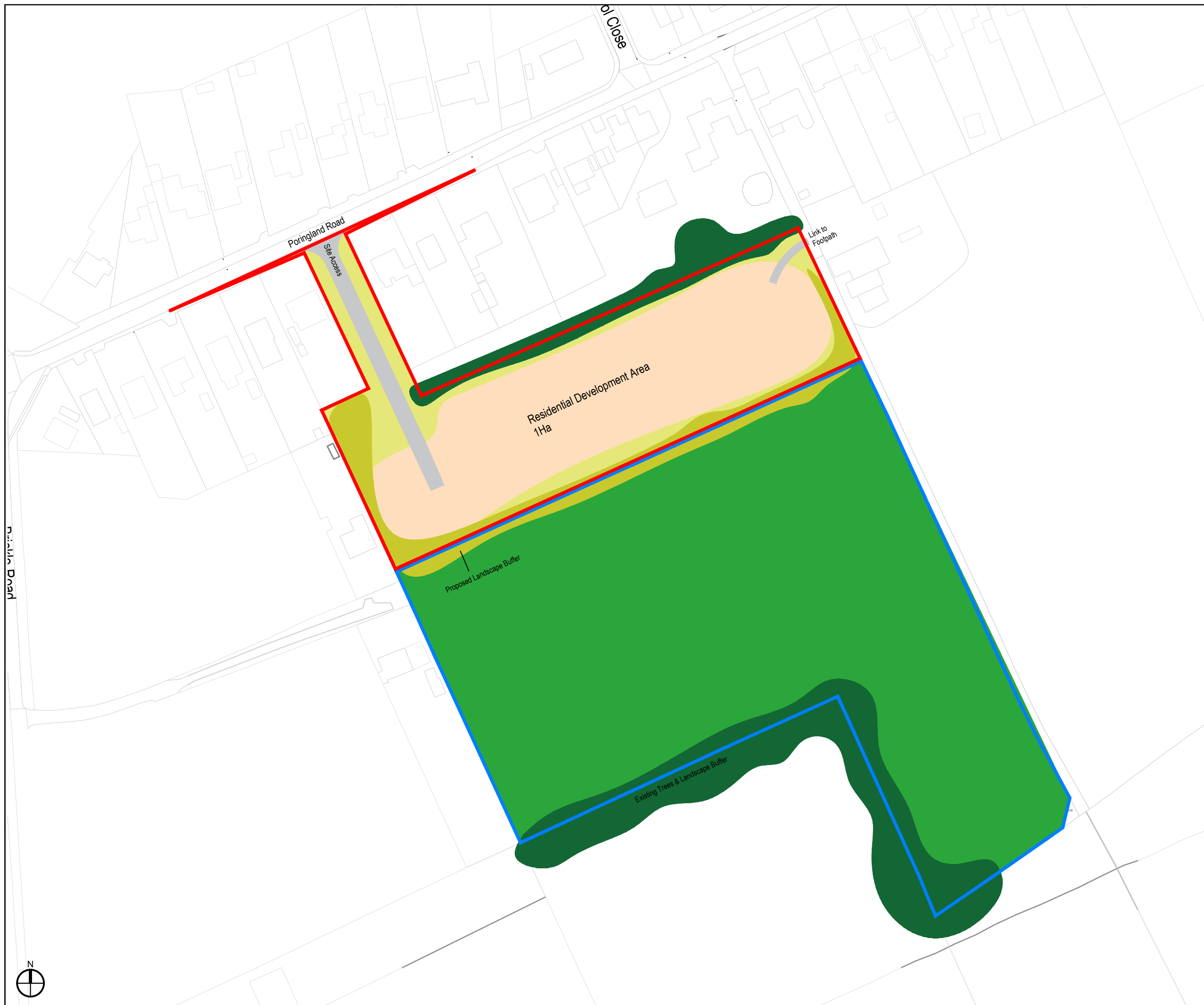
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Appendix 2 – Updated proposed allocation area



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| DRAWING STATUS S0 - Initial Status |
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| PROJECT TITLE Poringland Road, Upper Stoke |
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| CLIENT Glavenhill |
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| DRAWING TITLE Site Schematic Arrangement - GNL Reg 18C Consultation | SCALE 1:1250@A3 |
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