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Our ref: 2040

22 March 2021

Greater Norwich Growth Board

Submitted electronically

Dear Sirs

**Greater Norwich Local Plan Regulation 19 Strategy and Site Allocations – Land South of Poringland Road, Upper Stoke**

**Introduction**

These representations are submitted on behalf of Glavenhill Limited to the Greater Norwich Local Plan (GNLP) Regulation 19, Draft Strategy and Site Allocations Process.

These representations relate to Land South of Poringland Road, Upper Stoke (reference GNLP0494R) (the allocation site) for which Glavenhill are both landowner and promotor.

These representations follow Glavenhill's earlier objections to the Local Plan process and reaffirm their view that the spatial strategy for the Key Service Centre of Poringland as set out in Policy 7.3 of the GNLP Regulation 19 draft and the Plan's failure to allocate this suitable, available and deliverable site for residential use within the Sites section of the draft Plan, are unjustified and therefore 'unsound'.

**Background**

The allocation site was 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.

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 and then dismissed at appeal. South Norfolk District Council (the Council) assessed the then proposed allocation site and concluded as part of the 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."*

In response to this conclusion, Glavenhill presented an alternative, smaller site boundary and development proposition for allocation (see **Appendix 1** for proposed allocation boundary and suggested development area) as part of the Regulation 18 Stage C consultation.

Those representations concluded that the revised allocation area could 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.

Despite these revisions, the current GNLP Regulation 19 draft concludes that the site is 'unreasonable' for allocation, for the same reasons as previous, namely:

*"During Regulation 18C consultation the site promoter changed the site boundary. 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."* (GNLP Regulation 19 Evidence Base Site Assessment Booklets Appendix B).

These latest representations respond directly to the Council's reason for discounting the site and in doing so reiterate Glavenhill's objection to the strategy set for the Key Service Centre of Poringland / Framingham Earl.

### **Soundness of Draft Local Plan Policies (draft Policy 1, Policy 7.3)**

Key Service Centres such as Poringland / Framingham Earl are identified under draft Policy 1 of the Regulation 19 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 695 new homes are proposed to come forward through new allocations within all nine Key Service Centres. This is considered unsustainable, disproportionate and unjustified.

One reason why such limited new growth is being proposed for Key Service Centres is the significant level of dispersed growth that is being directed to rural parts of the plan area. This dispersal strategy is particularly pronounced within South Norfolk where 1,200 homes, on yet to be identified sites, could all be allocated in small cluster villages in the rural parts of the District (outside of the old Norwich Policy Area). Glavenhill object to this dispersal strategy considering it unsustainable and in the absence of a South Norfolk Village Clusters Site Allocations Document, potentially undeliverable.

A more sustainable, justified and positively prepared strategy would be to allocate additional land for housing within the Key Service Centres.

With specific reference to draft Policy 7.3 of the Regulation 19 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’ against the tests set out in paragraph 35 of the National Planning Policy Framework.

The Council’s decision not to allocate more housing in the Poringland Area because “*high amounts of existing commitments limit the potential for additional housing.*” (paragraph 5.50 of GNLP Regulation 19 draft Poringland Sites Documents) is considered by Glavenhill be unjustified and therefore unsound. Contrary to the Council’s suggestion, a significant proportion of the 547 dwellings identified within the draft Plan to benefit from planning permission within the area have now been delivered and their impact is already being felt (see Table 1 below). Based upon current rates of delivery, all dwellings currently benefitting from planning permission are likely to be delivered within 2 Years of Plan’s adoption, if not sooner. It is also important to note that the housing requirements should be regarded as minimums (NPPF Paragraph 60) and every opportunity must be sought within the Local Plan to “*significantly boosting the supply of homes*” (NPPF paragraph 59), an objective that Glavenhill consider is unable to be fulfilled through the lack of new dwellings earmarked for the Poringland Area under Policy 7.3.

Despite recent high levels of housing delivery within the Poringland area, it was demonstrated in representations made by Glavenhill to the Regulation 18 Stage C consultation in respect of proposed allocation GNLP0485, that the settlement and its existing services can accommodate additional development and in the case of that land (to the North of Caistor Lane) can, through its allocation, actively assist in the provision of new infrastructure, including a new Primary School, which Norfolk County Council as the Local Education Authority confirm is required; a site for a new community building and playing pitch, which the Parish Council have requested; and a Country Park, to meet the needs of the existing population.

It is Glavenhill’s opinion that there remains significant benefit in supplementing local housing provision to support local needs and the continued vitality and viability of this Key Service Centre. This can and should be done through the allocation of suitable and deliverable sites such as Land to the south of Poringland Road, Upper Stoke.

**Table 1 – Assessment of large scale housing commitments in the Poringland Area**

Site (major allocations / planning permissions relating to more than 5 dwellings)	Commitment (dwellings)	Committed / to be delivered as of 31/03/20 as presented in 2020 South Norfolk Housing Delivery Document (dwellings)	Commentary February 2021
Land south of Stoke Road West of The Street & 29 (IN) North of Heath Loke GA phase 2  David Wilson Homes	232	50	Company website confirms all properties complete and sold.  0 available

Site (major allocations / planning permissions relating to more than 5 dwellings)	Commitment (dwellings)	Committed / to be delivered as of 31/03/20 as presented in 2020 South Norfolk Housing Delivery Document (dwellings)	Commentary February 2021
Land north of Shotesham Road, East of Carr Lane  Norfolk Homes	221	145	9 properties released of which 7 have been sold.  138 available and if to be delivered at a rate of 35 dwellings per annum provides only 4 years' supply.
Land at Heath Farm  David Wilson Homes	270	74	Company website confirmed all properties now sold  0 available
Land west of Octagon Farm  Bennett Homes	60	40	Site visit suggests that 39 properties complete  Assumes 21 remain available

## The Proposed Allocation

The proposed allocation site has been reassessed by the Council as part of the Regulation 19 draft Local Plan process. The Council's assessment of the previously promoted larger site allocation and their more recent assessment of the current, smaller proposed allocation site against the GNLP HELAA criteria, is shown in **Table 2**.

It is Glavenhill's view that the Council's most recent assessment is inaccurate and unjustified. It is Glavenhill's view with reference to recently undertaken technical assessments, that the proposed housing allocation can provide a suitable, available and deliverable development proposition when assessed against the HELAA criteria (see **Table 2**).

**Table 2 – HELAA Assessment of GNL0494 and GNL0494R**

HELAA Categories	The Council's assessment of previously promoted, larger allocation area (GNLP 0494)	The Council's assessment of reduced proposed allocation area (GNLP 0494R)	Glavenhill's comments on the Council's assessment of GNL0494R
Site Access	Amber	Amber	The access point as designed for the 2019 planning application meets highway design guidelines with sufficient visibility being achievable in both directions.  NCC Highway Department provided no objection to the planning application for 54 dwellings on the site nor to this latest HELAA reassessment where they conclude that any allocation would be "Subject to improvements agreed as per planning application 2017/2871" (GNLP Regulation 19 draft Poringland Site Assessment Booklet page 113)  Green
Access to Services	Amber	Amber	The site benefits from excellent access to a range of services within Poringland.  Green
Utilities Capacity	Green	Amber	The 2019 planning application confirms that there is an appropriate level of utility provision to serve a 54 dwelling scheme at the site.  There has been no objection from officers to this scheme on utility grounds nor to the proposed allocation of the reduced site area.
Utilities Infrastructure	Green	Green	As above  Green
Contamination / ground stability	Amber	Green	Green
Flood Risk	Amber	Amber	The Lead Local Flood Authority confirm as part of the HELAA that part of the site is "at risk of surface water flooding, but this is not severe enough to prevent development of the site. Mitigation will be required, and standard information will be required at planning stage." A deliverable and suitable solution to managing surface water flooding was presented as part of the 2019 planning application. No objection was received to this strategy from the LLFA.  Green
Market Attractiveness	Green	Green	Green
Significant Landscape	Green	Green	Green

HELAA Categories	The Council's assessment of previously promoted, larger allocation area (GNLP 0494)	The Council's assessment of reduced proposed allocation area (GNLP 0494R)	Glavenhill's comments on the Council's assessment of GNLP 0494R
Sensitive Townscape	Green	Green	Green
Biodiversity and Geodiversity	Green	Green	Green
Historic Environment	Green	Green	Green
Open Space and GI	Green	Green	Green
Transport and Roads	Green	Amber	The access point will continue to meet highway design guidelines with sufficient visibility being achievable in both directions.  NCC Highway Department provided no objection to the planning application for 54 dwellings on the site nor to this latest HELAA reassessment where they conclude that any allocation would be "Subject to improvements agreed as per planning application 2017/2871" (GNLP Regulation 19 draft Poringland Site Assessment Booklet page 113)  Green
Compatibility with neighbouring uses	Green	Amber	When compared to the previous planning refusal on the larger site area the allocation will significantly reduce the number of dwellings that would use the proposed access, thus reduce the number of vehicle movements and concerns over amenity loss from noise and light shine.  Limiting dwellings to a single storey can address previous concerns over potential amenity loss to properties located along the Poringland Road frontage.  Green

## Summary and Conclusion

The Local Plan strategy not to allocate any additional land for housing within the Key Service Centre of Poringland is considered unsound. The service centre contains a number of local services which continue to occupy capacity. Whilst the number of committed dwellings appeared numerous at the start of the plan preparation process, delivery and sales rates remain buoyant and the number of undelivered commitments is now low, whilst service capacity remains good.

The proposed allocation site is suitable, available and deliverable and its allocation for residential use is a 'sound' proposition. Previous concerns over the impact of large-scale development in this



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location have been addressed through amendments to the site boundary and limitations on the number and type of dwellings being proposed for allocation.

A small-scale development or circa 20 bungalows is entirely appropriate for this location and capable of being delivered within the limits of what has previously been deemed acceptable.

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

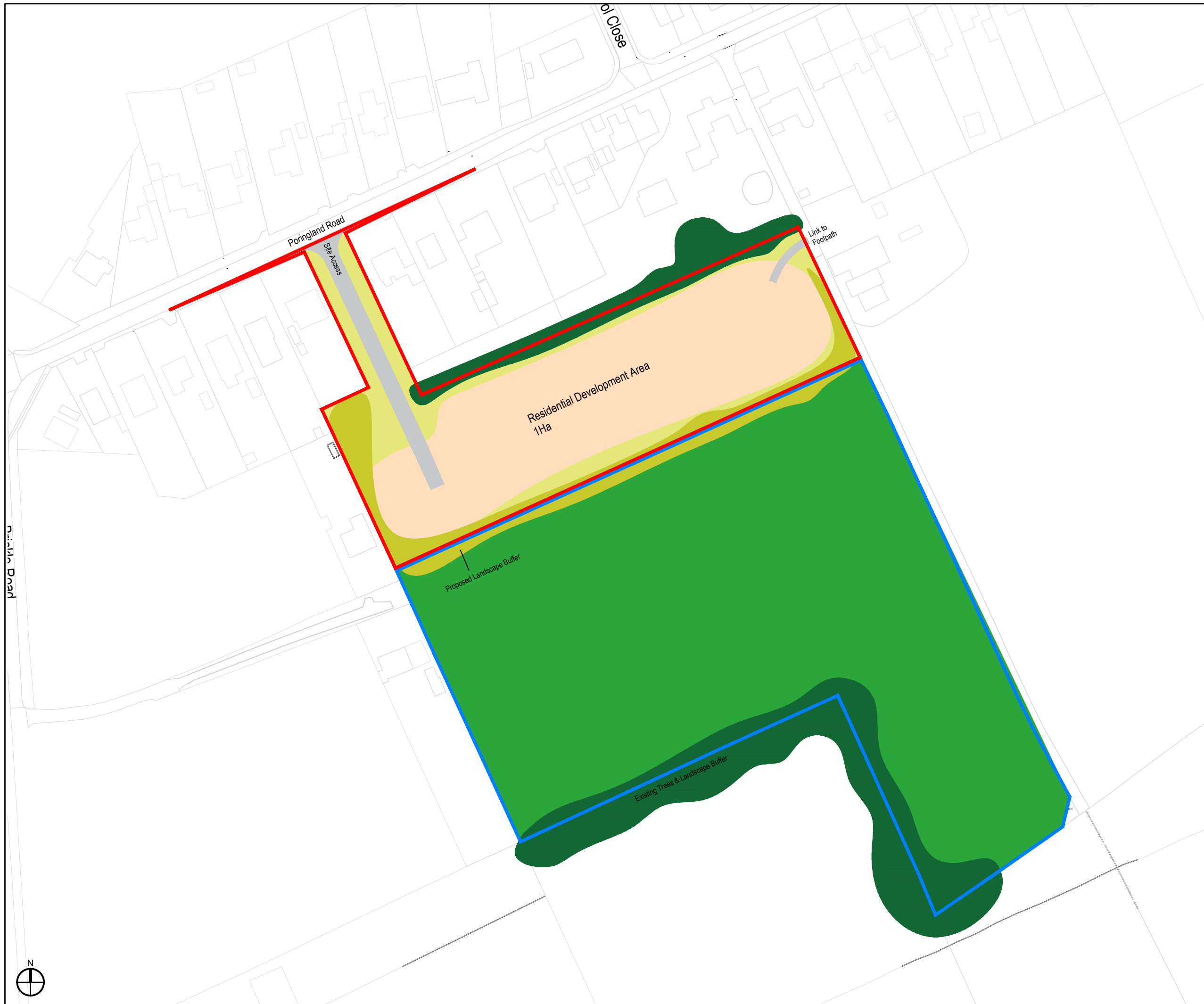
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## Appendix 1 – Updated proposed allocation area





**NOTES**

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<http://www.hse.gov.uk/construction/cdm/2015/responsibilities.htm>

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