



Brettingham House, 98 Pottergate, Norwich NR2 1EQ
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Date: 2nd August 2021

Our ref: 2931/VCHAP

SUBMITTED ELECTRONICALLY

Dear Sir / Madam

**Re: Village Clusters Housing Allocations Plan (Reg.18)
Proposed extension to the settlement limit of Stoke Holy Cross to include Land West of Norwich Road, Stoke Holy Cross**

These representations are submitted in response to the current Village Clusters Housing Allocation Plan Regulation 18 (the draft plan) consultation process.

These representations relate to land off Norwich Road, Stoke Holy Cross (the subject site) and are submitted on behalf of land promoters, Glavenhill Limited.

These representations respond specifically to Questions 123 and 125 of the draft plan as they relate to proposed changes to the settlement limit and to rejected sites within the village of Stoke Holy Cross.

These representations seek an extension to the existing settlement limit of the village to include an additional 0.7ha of land along Norwich Road to the immediate south of the existing settlement (see **Appendix 1** for proposed extension).

The subject site forms part of a wider land parcel (reference SN2091) which was submitted for allocation by the then land promotor as part of the Greater Norwich Local Plan Regulation 18 (B) – Revised and Small Sites – Consultation event in Autumn 2018.

The Council has assessed this wider promotion site against the South Norfolk Village Cluster Assessment Criteria as part of the Regulation 18 plan drafting process and has rejected it as *“whilst the site benefits from good connectivity and no significant highways concerns have been identified, the site forms an important gateway to the settlement and development of the scale proposed would have a harmful impact on both the landscape and townscape setting. It would also contrast with the existing loose pattern of development in this location. Heritage concerns have also been identified due to the proximity of the site to the Grade II* Church of Holy Cross.”*

The village of Stoke Holy Cross has, however, been deemed an appropriate location for additional housing growth within the draft plan with 25 new dwellings proposed through the Council’s preferred housing allocation reference SN0202.

The subject site is considered by the Council, as with site SN0202, to be within walking distance of a range of local services, including being within 1.2km of the Primary School and therefore scores highly (Green) based upon its accessibility (see **Appendix 2** for a copy of the Council’s assessment of SN0291 against the South Norfolk Village Clusters Assessment Criteria).



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In recognition of the site's accessibility and the capacity of the settlement to accommodate additional growth, these representations address the Council's concerns on SN2091 and promote a much-reduced area of land to the West of Norwich Road for residential development.

It is respectfully requested that the reduced site area be included within a minor extension to the existing settlement limit as opposed to the previously suggested site-specific allocation.

The extension of the settlement in the manner shown, will reinforce the more traditional, strong linear form of development which has occurred along the eastern banks of the River Tas away from the older historic part of the settlement around the Mill (section 35 of the draft plan).

It is also proposed that the remainder of the SN2091 and wider land ownership be safeguarded or designated for a new publicly accessible habitat improvement area which may be referred to as a condition of any future development in this location within the draft plan.

The proposed extension of the settlement limit southward along Norwich Road in the manner shown at **Appendix 1** can be seen from Lanpro's assessment, included at **Appendix 2**, to address the Council's previous concerns on SN2091.

The extension of the settlement limit in the manner proposed has the potential to facilitate the delivery of beneficial, small scale residential development (up to 3 dwellings) to include the potential for self build dwellings, together with a new wildlife and recreational resource. One way in which this could be delivered is shown on the illustrative masterplan produced at **Appendix 3**.

It is for these reasons that Glavenhill respectively request that the site be reconsidered in its reduced form for inclusion within the Village Clusters Housing Allocations Plan.

If you require any additional information on this matter, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read "Hannah Smith".

Hannah Smith
Associate Director MRTPI AIEMA

Enc.



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Appendix 1 – Proposed Extension to Settlement Limit

NOTES

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All dimensions are in millimeters unless stated otherwise.

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These duties can be found at:

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

It is your responsibility as client to make yourself aware of your role within CDM 2015 and act accordingly.

Proposed site for extension to settlement limit.

Location:

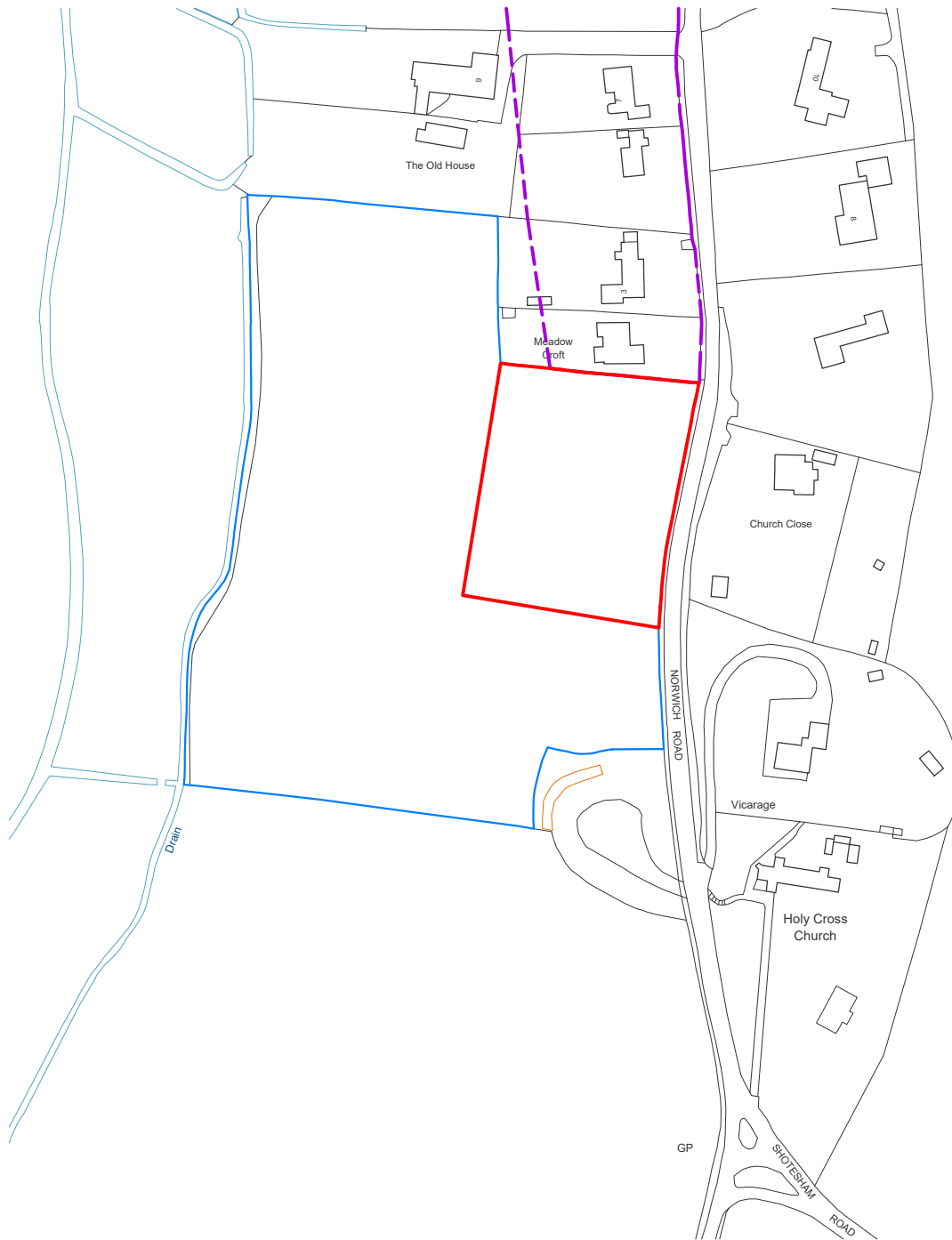
Land west of Norwich Road,
Stoke Holy Cross
NR14 8AB

Site area: 0.65 ha

Blue line area: 2.55 ha

Key

- Submission site
- Land in same ownership
- Existing settlement limit



REVISED BY: -	DATE: -	CHECKED BY: -	DATE: -
PURPOSE OF ISSUE PL - For Planning Submission			RIBA STAGE
DRAWING STATUS S2 - Fit for Information			
PROJECT TITLE Land west of Norwich Road, Stoke Holy Cross			
CLIENT Glavenhill Ltd			
DRAWING TITLE Site Location Plan (for VCHAP Reg 18)			SCALE 1:2500@A4
DATE Aug 2021	DRAWN BY SF	CHECKED BY HS	APPROVED BY HS
DRAWING NUMBER			
PROJECT NO 2931	TYPE 00	UNIQUE NO 001	REVISION

Location Plan 1:2500 @ A4



[Architecture and Urban Design]

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Appendix 2 – Site Assessment against the South Norfolk Village Cluster Assessment Criteria

Section 1: Site Details

<u>Criteria</u>	<u>SNC Assessment (August 2020)</u>	<u>Lanpro Assessment (August 2021)</u>
Site Reference	GNLP2091	unchanged
Site address	Land of Norwich Road, Stoke Holy Cross	unchanged
Current planning status (including previous planning policy status)	Unallocated	unchanged
Planning History	None	unchanged
Site size, hectares (as promoted)	1.24 ha	0.7 ha
Promoted Site Use, including (m) Allocated site (n) SL extension	Allocation	Settlement limit extension
Promoted Site Density (if known – otherwise assume 25 dwellings/ha)	12 dwellings (approx. 9 dwellings per hectare) 31 dwellings at 25dph	3 dwellings (approx. 5 dw/ha) Set within 2.5 ha of landscaped area (outside proposed settlement extension)
Greenfield/ Brownfield	Greenfield	unchanged

Section 2: Absolute Site Constraints

<u>Constraints</u>	<u>SNC Assessment (August 2020)</u>	<u>Lanpro Assessment (August 2021)</u>
SPA, SAC, SSSI, Ramsar	No	unchanged
National Nature Reserve	No	unchanged
Ancient Woodland	No	unchanged
Flood Risk Zone 3b	No	unchanged
Scheduled Ancient Monument	No	unchanged
Locally Designated Green Space	No	unchanged

Section 3: Suitability Assessment

Constraint	SNC Assessment (August 2020)	Lanpro Assessment (August 2021)
Access to the site	AMBER (previously GREEN) A suitable access and other road improvements appear to be achievable by development of the site. NCC HIGHWAYS – Amber. Subject to widening frontage footway to 2m.	GREEN Widening of frontage footpath can be secured through development of the site
Accessibility to local services and facilities	GREEN <ul style="list-style-type: none"> • Primary School – 1.2km • Bus stops – 0.3km • Fish&chip shop, PH, limited employment – 1km • Village Hall (inc. sports/ recreation facilities and preschool) – 1.1km • PH and restaurant – 1km 	GREEN unchanged
Utilities Capacity	AMBER (previously GREEN) Water infrastructure capacity	GREEN Capacity can be assessed at point of development. Limited impact through reduced requirement
Utilities Infrastructure	GREEN	GREEN unchanged
Better Broadband for Norfolk	GREEN	GREEN unchanged
Identified ORSTEAD Cable Route	GREEN Not within the identified ORSTED cable route	GREEN unchanged
Contamination & ground stability	GREEN No known constraints in relation to utilities infrastructure or contamination/ground stability	GREEN unchanged
Flood Risk	GREEN No known risk of surface water flooding.	GREEN unchanged

<u>Impacts</u>	<u>SNC Assessment (August 2020)</u>	<u>Lanpro Assessment (August 2021)</u>
SN Landscape Character Area	Tas Rural River Valley Agricultural Land Class Grade 3	unchanged
Landscape Assessment	AMBER Site within an attractive valley landscape. Some containment around field boundaries.	GREEN unchanged Potential to deliver considerable habitat and landscape improvements to be facilitated by the site's development
Townscape	AMBER Site would extend the settlement along Norwich Road to towards Holy Cross Church elongating the settlement further south. Development in this location would have an impact on townscape character.	GREEN Development would be positioned linearly along Norwich Road, thus keeping with the loose rural-urban transitional character
Biodiversity & Geodiversity	AMBER Hedges around site boundaries and within site, including trees.	GREEN Potential to retain and significantly add to existing boundary landscaping
Historic Environment	AMBER Impact on the nearby Grade II* listed Church of Holy Cross approximately 100 metres to the southeast	AMBER / GREEN Impact of development reduced by reduction in development extent and provision of improvements to landscape setting. The provision of an additional publicly accessible, wildlife and recreational resource is of further public benefit
Open Space	GREEN No impact	GREEN unchanged
Transport and Roads	GREEN Rural local road network. Highway constraints could potentially be overcome through development.	GREEN unchanged

	NCC HIGHWAYS – Green. Subject to widening frontage footway to 2m.	
Neighbouring Land Uses	GREEN Agricultural fields to south and west and residential to north the east.	GREEN unchanged

Section 4: Site Visit

Observations	SNC Assessment (August 2020)	Lanpro Assessment (August 2021)
Impact on Historic Environment and townscape?	Impact on the nearby Grade II* listed Church of Holy Cross approximately 100 metres to the southeast. Townscape impact – development in this location has a loose urban grain reflecting transition from rural setting -settlement. Introduction of an estate style development in this location – even at a small scale – would impact on this gateway	Extension to settlement boundary would allow for 3no. dwellings in linear layout along Norwich Road, thus extending existing townscape character. Impact on gateway to the settlement would be limited and improved upon through suggested habitat / landscape area Impact upon heritage assets would be reduced and in part compensated through improvements to landscape setting
Is safe access achievable into the site? Any additional highways observations?	Access could be taken from Norwich Road.	unchanged
Existing land use? (including potential redevelopment/ demolition issues)	Agricultural field	unchanged
What are the neighbouring land uses and are these compatible? (impact of development of the site and on the site)	Agricultural fields to south and west and residential to north the east.	unchanged
What is the topography of the site? (e.g. any significant changes in levels)	Generally flat	unchanged
What are the site boundaries? (e.g. trees, hedgerows, existing development)	Trees and hedges around the site boundaries	Boundary trees and hedges to be retained and supplemented

<p>Landscaping and Ecology – are there any significant trees/ hedgerows/ditches/ ponds etc on or adjacent to the site?</p>	<p>Mature hedgerows and trees. Ecological considerations are that the site is immediately east of the River Tas, within the River Valley Landscape designation area, and within the impact risk zone for Shotesham Common SSSI. The constraints identified would need addressing but could potentially be mitigated.</p>	<p>Settlement limit extension is at furthest point on site from River Tas, thus limiting its impact and providing opportunity for ecological/GI enhancement across the remainder. Considerable potential to deliver landscape and ecological enhancements through securing the delivery of a landscape improvement area to the immediate west of the proposed settlement extension through the Village Clusters Housing Allocation document</p>
<p>Utilities and Contaminated Land– is there any evidence of existing infrastructure or contamination on / adjacent to the site? (e.g., pipelines, telegraph poles)</p>	<p>No evidence of existing infrastructure or contamination</p>	<p>unchanged</p>
<p>Description of the views (a) into the site and (b) out of the site and including impact on the landscape</p>	<p>Views into and out of the site from will likely have some impact on the rural landscape character.</p>	<p>Extension to settlement boundary would change location of urban-rural boundary but only by approx. 100m. Open views across landscape would be retained in their majority</p>
<p>Conclusion</p>	<p>RED</p> <p>Significant concerns over the impact of developing this site on the rural landscape valley and townscape character.</p>	<p>GREEN</p> <p>These representation seek an extension to the settlement limit, and to the existing form and character of development in this part of the village as opposed to the previously promoted “estate” style housing allocation</p> <p>Previously identified impacts on landscape and townscape character, and on heritage assets can be significantly reduced. The provision of an additional publicly accessible habitat improvement area as a condition of the proposed</p>

		settlement limit extension is an additional public and ecological benefit
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Section 5: Local Plan Designations

<u>Designations</u>	<u>SNC Assessment (August 2020)</u>	<u>Lanpro Assessment (August 2021)</u>
River Valley	AMBER Does not conflict with existing or proposed land use designations	GREEN Settlement limit extension will have smaller impacts than those assessed including with regard to land use and landscape character

Section 6: Availability and Achievability

<u>Availability</u>	<u>SNC Assessment (August 2020)</u>	<u>Lanpro Assessment (August 2021)</u>
Is the site in private/ public ownership?	Private single ownership	unchanged
Is the site currently being marketed?	No	unchanged
When might the site be available for development?	GREEN Immediately to within 5 years	GREEN unchanged

<u>Achievability</u>	<u>SNC Assessment (August 2020)</u>	<u>Lanpro Assessment (August 2021)</u>
Evidence submitted to support site deliverability?	GREEN Supporting information from promoter. No known significant constraints to delivery	GREEN unchanged
Are on-site/ off-site improvements likely to be required if the site is allocated?	AMBER Possible upgrades to water supply and foul water network	GREEN Capacity can be re-assessed at point of development
Has the site promoter confirmed that the delivery of the required affordable housing contribution is viable?	AMBER The site promoter has not confirmed this so delivery would need to be confirmed	GREEN Not applicable to settlement boundary extension/ provision of 3no. dwellings



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Are there any associated public benefits proposed as part of delivery of the site?	Delivery of new green infrastructure comprising 4.32 ha of GI to offset development pressures on other existing open spaces.	2.5 hectares of GI/ landscaping area
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Appendix 3 – Illustrative Masterplan



Land West of Norwich Road
Stoke Holy Cross
Illustrative Masterplan
NTS 2931 SK002 June 21

