

**Proposed Residential Development  
On land north and south of Old Road and west of Hallowing  
Lane, Great Moulton**

**Submission of Representations relating to  
South Norfolk Village Clusters Housing Allocations Plan  
(Regulation 18 Draft)**

**on behalf of ESCO Developments Ltd and GF Cole & Son Ltd  
Ref: 17/199**

**GNDP Site ref: GNLPO554, GNLPO555 and GNLPO557**

## REPRESENTATIONS TO REGULATION 18 CONSULTATION ON THE DRAFT VILLAGE CLUSTERS DOCUMENT (AUGUST 2021)

Greater Norwich Local Plan: On land north and south of Old Road and west of Hallowing Lane, Great Moulton (Ref: GNLP0554, GNLP0555, GNLP0557)

### Introduction

1. The following comments are submitted in support of land north and south of Old Road and west of Hallowing Lane, Great Moulton (ref GNLP0554, GNLP0555, GNLP0557)
2. Representations for these sites were submitted to the previous Reg 18 Consultations for the Draft Local Plan in March 2020.
3. The following Representations both reiterate information already submitted in support of the sites, as well as comments on the status of the sites in light of the current consultation.

### Comments on Village Clusters Document

4. The main aim of the Plan is to allocate a series of smaller sites, typically within the range of 12 to 50 homes, across the 48 Village Clusters in South Norfolk in order to provide at least 1,200 new homes in accordance with the requirements of Draft Greater Norwich Local Plan Policy 7.4. The intention is to distribute development across the District in order to support the sustainability of rural settlements and address the needs of small and medium developers, in line with the provisions of the National Planning Policy Framework (hereinafter 'NPPF').
5. The Plan has sought to assess parishes, in unison and individually, in terms of their provision of local services and facilities. In line with the approach as set out within the Greater Norwich Local Plan (hereinafter 'GNLP') each of the 'Clusters' are centred around the local primary school, with the associated catchment areas serving as a proxy for social sustainability. The availability of other services and facilities has also been considered, and has informed the site assessment process. The assessment has been informed by the Norfolk-wide Housing and Economic Land Availability Assessment (HELAA) Methodology (2016), site visit, planning history, and Landscape Character Assessment amongst others.
6. Great Moulton is identified as forming part of the village cluster that includes Aslacton and Great Moulton. The cluster benefits from an active combined Aslacton and Great Moulton Community Hall, which offers a range of clubs and activities, a pub in Great Moulton and a Primary School in Aslacton, as well as St Michael Church.
7. None of the 3 sites have been allocated in the draft village clusters document, being rejected based on the fact that the sites do not benefit from a safe walking route to the primary school, as well as being subject to highways, trees and heritage constraints. These are discussed in the next section.

### Comments on site constraints/Site suitability

8. The Site Assessment Form completed by the Council confirms that there are no on-site constraints which would represent an absolute bar to residential development of the site: it does not form part of a statutorily designated conservation site; is not within Flood Zone 3; does not form part of a Scheduled Ancient Monument; and is not designated for any other purposes.

9. The site assessment utilises the HELAA score and combines this with the wider site data collected to produce a site score. Each of the four constraints identified as reasons for rejection are considered below.

The HELAA exercise identified the following scores for each site:

	GNLP0554	GNLP0555	GNLP0557
<b>Constraints Analysis</b>			
Access	Amber	Amber	Amber
Accessibility to Services	Amber	Amber	Amber
Utilities Capacity	Amber	Amber	Amber
Utilities Infrastructure	Green	Green	Green
Contamination & Ground Stability	Green	Green	Green
Flood Risk	Amber	Amber	Amber
Market Attraction	Amber	Amber	Amber
<b>Impacts Analysis</b>			
Significant Landscapes	Green	Green	Green
Townscapes	Green	Amber	Amber
Biodiversity & Geodiversity	Green	Green	Green
Historic Environment	Amber	Amber	Amber
Open Space and GI	Green	Green	Green
Transport & Roads	Amber	Amber	Amber
Compatibility with Neighbouring Uses	Green	Green	Green

#### Heritage

10. The HELAA identified Heritage in all 3 sites as Amber. The site assessment form for the village clusters also assesses all 3 as Amber. There are a number of Listed Buildings in the vicinity of the sites including Kett's Farm (Grade II) and barn immediately west of Kett's Farmhouse (Grade II).

11. Further Listed Buildings include the Fox and Hounds Public House (Grade II) to the east of the proposed development and a range of farmhouses, cottages and barns which are Grade II listed buildings along High Green.

12. The significance of these Grade II Listed timber buildings appears to derive principally from its architectural form/details and historic fabric. Given its separation from the sites and the screening effects of intervening houses and vegetation, it is considered that the proposed development would not have a material impact on the setting of Kett's Farmhouse, Barn or Cochaigue Primrose Cottage.

13. The proximity of the listed buildings is recognised. However, we believe that appropriate design measures can be incorporated into the proposed layouts which ensure that the setting of the listed buildings are not undermined. The proposed development could therefore be designed to have minimal impact on the surrounding historic environment.

It is worth noting that the allocated site in Aslacton scored Red in the HELAA for heritage impact. The current site assessment has scored it as being Amber, due to the development on the opposite side of the road.

### *Highways*

**14.** Both the HELAA and the current site assessment have scored all 3 sites as Amber for highways. The sites off Old Road have access either side of Old Road. Access will be improved in accordance with relevant highway standards, adding a public right of way. Old Road is a publicly maintainable highway within the meaning of the Highways Act 1980.

**15.** The HELAA analysis and current assessment form refers to the unsuitability of the local road network, however, we believe that this can be alleviated through junction and road widening in key locations. Further work is being undertaken to define the exact location for the road improvements, however, the low-density layouts for each of the sites show where potentially passing bays can be created.

**16.** Overall, improvements to the local road network may be necessary depending on the number of residential dwellings proposed. The roads are currently subject to a 30pmh speed limit. There is good visibility available from all sites from the existing access onto Old Road. There is existing residential development in close proximity to all of the sites.

**17.** The local road network comprises of mainly 'C' and unclassified roads, but the B1134 to the south of Sneath Common provides links to the A140 to the east and the B1077 and New Buckenham to the west.

The allocated site in Aslacton also has potential highways issues as identified in the HELAA and current site assessment. There is no reason why highways improvements cannot therefore be looked at in the same way for these 3 sites, as discussed above.

### *Trees*

**18.** Although this is listed as one of the constraints and reasons for rejection, it is not immediately clear what the tree issues are from the current site assessment form. However, a suitable Arboricultural Impact Assessment could identify any issues and any potential mitigation measures, if necessary.

It would be our intention, where possible, to retain trees on the sites concerned and only remove them if there is no alternative and ensure replacement native species are re-planted on site.

### *Safe walking route to school*

**19.** All 3 sites have been rejected on the basis of no safe walking route to school. Unlike some other village clusters, in the case of Great Moulton, there is no existing footpath that serves as a safe walking route to school anywhere in the village. It is not feasible to walk from the village to the primary school due to this. As such, existing village residents would need to travel by car to the school. To expect any new sites coming forward in Great Moulton to have safe walking access to the school is, therefore, unreasonable and unachievable from the outset due to the lack of a footpath anywhere along the existing route. As such, access to other services should also be a focal point for the assessment as per the HELAA and current site assessment criteria. All 3 sites are accessible to other services within the village, compared to the allocated site which does not. Residents of this site would need to then travel by car to those services within the village.

**20.** The allocated site in Aslacton appears to score similarly to the 3 Great Moulton sites in terms of heritage, access and trees, although has been allocated based on the safe route to school, albeit

lacking in a safe path for some of the route. The services offered in the cluster are spread out over the two villages, with the main focal of services being offered in Great Moulton and the school in Aslacton. It is, therefore, considered that the proposals would benefit from good access to a number of services offered in Great Moulton, offering the same level of access as that enjoyed by the existing residents.

**21.** The village is served by the 1 bus route (operated by Simonds) between Diss and Norwich, providing links to the nearby Long Stratton, with four stops within the parish. The service operates on weekdays and Saturdays. The nearest bus stop to the sites is located within walking distance on Woodrow Lane. The sites benefit from the close proximity to the A140 (approximately 4.8km) and the A11 (approximately 12.9km). Closest train station is Spooner Row which is approximately 11.7km from the site and the mainline operating to London is located close by in Diss which is approximately 17.4km from the site.

**22.** Long Stratton is located a short distance (approximately 6.4km) north east of Great Moulton and provides a range of other local services, including an infant school, junior school, high school, doctors' surgery, leisure centre, two small shopping centres and a Co-op supermarket.

**23.** The proposal would accord with Local and National Planning Policies which indicate that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Given their accessibility, existing local businesses and services would be likely to derive support from the development due to the addition to the local economy of the spending power of new residents. In these respects, the proposal would support the social and economic dimensions of sustainability as defined in the NPPF. The proposed development will bring benefits to the local area including local housing, amenity area, a community area and improvements to the local road network.

## Proposals

### *Layout*

**24.** The proposal is in three parts although they are in close proximity to each other. The proposals are as follows:

Land north of Old Road (Site Ref: GNLP0557)

Whilst the area is 0.36 Hectares (0.89 acres), the site is constrained and we believe will only produce a limited number of dwelling units. We believe that the site would produce 7 units which could be serviced plots for self-build units. Due to its size (of under 10 units), we believe that this site could come forward independently, however, in terms of developing an overall 'masterplan' for the area we have sought to share these proposals as part of the submissions to the emerging Local Plan.

Land south of Old Road (Site Ref: GNLP0555)

This site is broadly split into two fields totalling 1.46 hectares (3.6 acres). The western section of the site has a pond which is partially surrounded by trees and scrub. The boundaries to each of the fields has hedging and trees.

The proposals seek to retain the hedging where possible together with the existing pond and a proportion of the land as a public green space to create a central feature to the village. The initial sketch layout shows 27 dwellings.

Land west of Hallowing Lane (Site Ref: GNLP0554)

The area of land submitted as part of the 'Call for Sites' is approximately 1.09 hectares (2.69 acres). Rather than develop the whole of this section of land it is suggested that any development should be frontage only with 5 plots to enclose this section of the open space.



Figure 1- Indicative site layout

**24.** The above layout of all 3 sites show how an extension to the settlement boundary could easily be achieved, without detriment to the character of the existing settlement. Development of these sites would allow development to take place through a marginal extension of the settlement boundary that would not encroach on the wider countryside and contains the existing settlement. As such, the proposals are well placed to accord with the aims of the village clusters document as set out in the introduction of the document, to deliver smaller scale sites through extensions to settlement boundaries, in order to meet the windfall allowance.

#### Utilities

**25.** Having undertaken a desktop study we don't believe that there are any significant issues in terms of the utilities capacity. It is not considered that there is any fundamental impediment to the delivery of the site through any constraints relating to utilities infrastructure. The increase in

capacity can be built into the new development. The attached supplementary information in relation to Utilities confirms the capacity for the scheme.

**26.** In terms of surface water drainage, we believe that the pond could be extended to deal with attenuation before draining to the nearby ditch. It is intended that swales will be used to provide a SUDS solution to any drainage issue. It will also benefit the biodiversity of the area. Site investigations have been undertaken into the local surface water drainage system with outfalls traced from the site. With improvements to the pond and maintenance of the existing outfall route, also in the same ownership, the site can be drained with a SUDS strategy and attenuation.

### *Townscape*

**27.** The land proposed for development comprises of open agricultural fields north of the village but all 3 sites are well-contained visually by existing housing either side of the site. Established hedges and trees define and contain all three sites. Consequently, whilst the proposals would inevitably result in a loss of openness, the impact on the landscape setting of the village and the character of the area generally would be minimal.

**28.** Great Moulton has developed between a number of traditional farmsteads along the south side of High Green and some further farms on the north side of Old Road. The established pattern of development in the vicinity is mixed but is made up predominantly of two storey detached and semi-detached houses and bungalows set in good sizes plots.

**29.** Great Moulton is a compact settlement which has seen a considerable amount of modern development, with estate development such as Potters Crescent and Heather Way, as well as a large amount of infill development. The proposal would be consistent in form with these developments and so would not appear out of place and would also be compatible with its surroundings. The development seeks to work with the LPA to identify a suitable number of housing in relation to Great Moulton.

**30.** Recent development in Great Moulton includes for an exceptions affordable housing scheme, west to the extent of development in Great Moulton along the northern side of High Green.

### *Flooding*

**31.** Parts of the site are at a low risk from surface water flooding, however this corresponds to less than 1% of the total site area. As a result, this is not considered to be representative of the surface water risk at the site. Further technical work, including a site-specific flood risk assessment, would be commissioned in advance of any future planning application to demonstrate that the proposed development would not be a risk of flooding or be likely to result in an increased flood risk elsewhere in the locality. The accompanying Supplementary Information prepared by ESCO Development Ltd demonstrates this.

## Delivery of development

**32.** No significant infrastructure constraints have been identified to date which would be likely to delay or impede the development of the sites for housing. The sites are in single ownership and no further land is needed to enable the land to be brought forward for development. The land is available now for development, and therefore, subject to approval being given, could deliver housing as soon as possible.

**33.** A developer has been identified (Saffron Housing) to partner with ESCO throughout the Local Plan process and any future planning application. This adds a greater level of certainty in terms of the delivery of the development. The attached letter from Saffron confirms that they are committed to developing the sites and that the sites can be delivered within the next 3 years.

**34.** The proposed development would make a positive contribution to the supply of housing in the area and could facilitate improvements to the local utilities capacity. The proposals would also add to the range of housing sites available in the locality, providing flexibility and a wider choice of development opportunities to the market, and thus strengthening the local supply of housing land. By providing sufficient land of the right type in the right place to support growth the development would address the economic dimension of sustainable development, as defined in the NPPF.