

Proposed Residential Development On land at Cooks Field, Pulham Market

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

on behalf of D C West Farms

Ref: 028979

GNDP Site ref: SN0418

REPRESENTATIONS TO SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS PLAN JUNE 2021

Land at Cooks Field, Pulham Market (Ref: SN0418)

Introduction

1. The following comments are submitted in support of the land at Cooks Field, Pulham Market (Ref: SN0418) for residential development comprising no more than fifteen dwellings.
2. The site was originally submitted through the 2016 Greater Norwich Local Plan Call for Sites, with additional Representations made to the previous Regulation 18 Consultations in March 2018 and March 2020.
3. The following Representations reiterate information already submitted in support of the site, and offer additional comments in light of the current consultation.

Background to South Norfolk Village Clusters Housing Allocations Plan

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. Pulham Market is identified as forming a village cluster together with Pulham St Mary. The village is identified as having a primary school, pre-school, two Public Houses, two churches, convenience store, post office, village hall, recreation ground and tennis courts, allotments, bowling green, doctor's surgery, public transport services, and building materials supplier. At present, two sites across the cluster are proposed for allocation, providing 20 and 50 dwellings in Pulham Market and Pulham St Mary respectively.
7. The site at Cook's Field has not been proposed for allocation, however it has been identified as a 'shortlisted' site or reasonable alternative for allocation in addition to, or instead of the aforementioned sites if required. It is considered that the land proposed at Pulham Market is extremely well placed to comply with the criteria of the Village Clusters Plan, given its proximity to schools, healthcare, employment, day to day retail and service provision, public transport, village hall and public house. The site is in a highly sustainable location, would support the social sustainability of the village, and is suitable for housing, it is therefore considered that the site should be allocated for housing through the South Norfolk Village Clusters Housing Site Allocations Document.

Suitability Assessment

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 assessment utilises the HELAA score and combines this with the wider site data collected to produce a site score. Each of the topic areas are considered below.

Access and accessibility

10. Through the HELAA the site was scored amber for highways access, transport and roads as a result of the narrow width of Mill Lane in the vicinity of the site, however it was noted that initial highways evidence indicated that suitable access could be achieved.

11. The further site assessment undertaken by the Council also scores the site as amber. The comments set out within the Site Assessment Forms document note that the lane is narrow with shallow verges, and raises concerns over the ability to achieve suitable visibility, and of the local road network to accommodate the associated increased capacity.

12. It is acknowledged that Mill Lane in the vicinity of the site narrows, in particular there is a pinch point immediately north of the junction with Jocelyn Close which is assumed to result from the presence of a large mature Oak tree in this location. Whilst the highways verge is relatively shallow the landowner does control the land to the west of Mill lane, which would allow for requisite highways works to be delivered without ransom.

13. The indicative masterplan submitted alongside these Representations illustrates how the widening of Mill lane in the vicinity of the site could be accommodated. This has utilised the western edge of the existing carriage as a fixed point as a result of the adjacent trees, however arboricultural surveys to be undertaken as part of any future application may illustrate an ability to extend the carriage width westwards, further enhancing the highways arrangement.

14. The masterplan illustrates how the carriage could be widened to a minimum of 4.8 metres, together with the provision of a footway connecting the site to the existing footway which terminates a short distance away at Jocelyn Close. The nature of the adjacent development and existing landscape features may prevent the provision of a full footway/cycleway in this position, and could result in a pinch point measuring at 1.1 metres wide. However, it is proposed to deliver a three metre footway/cycleway from the south east corner of the site, extending to the nearby recreation ground. As such suitable pedestrian and cycling connectivity could be delivered as part of the redevelopment of the site.

15. As part of any development the 30mph speed limit could be extended along Mill Lane to incorporate the site, and the masterplan illustrates how suitable visibility could be achieved from the site, in either direction along Mill Lane. The local road network is considered to have suitable capacity to accommodate the scale of the proposed development with adversely impacting upon the free flow of traffic, or highways safety. As such, it is considered that safe and suitable access to the site could be achieved, together with an enhancement of the highways arrangement within the vicinity.

16. The HELAA and site assessment score the site green for accessibility due to availability of a wide range of services and facilities within Pulham Market, and the vicinity of the site to these. As part of the proposed development of the site a footway link would be provided to connect with the existing provision approximately 100 metres south east along Mill Lane, which subsequently provides continuous pedestrian access to the village centre and the services on offer there. Furthermore, a footway/ cycleway link would be provided to the recreation ground immediately adjacent the site to the south.

17. Accordingly, the proposal development would benefit from good access to local services, and 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.

Utilities Infrastructure

18. It is not considered that there is any fundamental impediment to the delivery of the site through any constraints relating to utilities infrastructure. The proposed development would include suitable

investigation and contributions to ensure there is capacity with local network, with suitable provision built into the development.

Flood Risk

19. The site falls entirely within Flood Risk Zone 1, as such it is considered to be at low risk of fluvial flooding. Nor is any part of the site identified as being at risk from surface water flooding, however a small section of Mill Lane to the west of the access is indicated as being at risk. The HELAA scored the site as amber, however the site assessment scores it as green. A suite of technical work would support any forthcoming planning application to demonstrate that development would not be at risk of flooding or result in an increased flood risk elsewhere in the locality.

Landscape

20. The HELAA scores the site as green, however the site assessment scores the site as amber as a result of the 'significant size' despite also noting that it is visually contained. The site forms part of a large arable field defined by hedgerow boundaries, it is largely flat and rectangular with narrow verges and some lengths of boundary ditches. It lays to the north west fringe of Pulham Market, between Mill Lane and Colegate End Road, and abuts a small residential development at Jocelyn Close and the recreation ground to the south. Whilst the entire field extends to a significant size, the site proposed for allocation comprises a small section of this comparable to the adjacent development at Jocelyn Close. Furthermore, the existing mature boundary hedging to the wider site largely contains views in and out, whilst additional hedging to be introduced as part of the development to define the site boundaries would further enhance the screening.

21. Whilst development of the site for residential purposes would inevitably alter the character and appearance of the site this would be highly localised, and would be viewed in the context of the adjacent main built form of Pulham Market. Indeed as noted within the site assessment of 'townscape' impacts, the development of the site would represent a "straightforward extension of the settlement", which would extend the settlement further north from the centre but which would be of limited impact as a result of the scale and visual containment.

22. The illustrative masterplan demonstrates how development could be accommodated at the site so as to conserve and enhance this character through sensitive development well related to the existing built form, providing an attractive feathered edge to the village. Hedges and trees would be retained as far as practicable, and additional landscaping introduced to enhance the existing natural boundaries and visual enclosure of the site. Sustainable drainage measures to be introduced would create small areas of water retention which would be in keeping with the landscape character, and have the dual purpose of supporting biodiversity at the site. Consequently, whilst the proposal would inevitably result in a loss of openness, its impact on the landscape setting of the village and the character of the area generally would be limited.

Biodiversity and Geodiversity

23. A Preliminary Ecological Assessment was undertaken at the site in 2018, which concluded that whilst further surveys were required the site was unlikely to support any protected species and that the only habitats likely to be of any importance at the site were the existing boundary hedgerows. The HELAA report scored the site as amber and the site assessment undertaken by the Council has confirmed that score, noting that development may impact upon protected species but that the impacts could be mitigated.

24. Development of the site would involve a small section of the wider field, all existing field boundaries to the north, east and south would be retained and further enhanced with additional mixed native species planting. Furthermore, mixed native species hedging, likely with interspersed trees, would be delivered to delineate the eastern boundary of the site proposed for allocation. Whilst it would be necessary to remove a section of hedging from the western boundary in order to facilitate access the retained hedge would be enhanced with additional planting.

25. Arable land is generally considered to be of low ecological value due to the intensive management required. The proposed development would create residential development with associated gardens, open space, surface water drainage features, amenity planting, and bird and bat boxes. Furthermore, a significant proportion of the existing hedging to the boundaries would be retained and enhanced, and further mixed native species hedging provided to the eastern site boundary. An indicative calculation of the current and

potential biodiversity value of the site has indicated that the development of the site for residential purposes could result in a net biodiversity increase of over 20% (DEFRA Metric 3.0).

Historic Environment

26. Through the HELAA assessment the site was scored as amber for impacts upon the historic environment, however the site assessment scores it as green due to the separation from the designated heritage assets to the east. Indeed, whilst the site is located near to a number of listed buildings, the closest of which is Falkland House approximately 80 metres south east, it is not considered that the proposed development would result in harm being caused to the significance of the buildings or their settings, by virtue of the distance of separation and intervening landscape features, and careful design and landscaping of the development.

27. The proposed development would seek to respect the nearby listed buildings and the Conservation Area through the use of traditional building materials, a mix of dwelling types and sizes, and the use of hard and soft boundary treatments in order to create a range of spaces, visual interest, and the directing views along streets.

Conclusions

28. No significant infrastructure, contamination or ground instability constraints have been identified to date which would be likely to delay or impede the development of the site for housing. The site is in a single ownership and no further land is needed to enable the land to be brought forward for development. The land is currently available for development and so, subject to approval being given, could deliver housing in the short term.

29. The proposed development would make a positive contribution to the supply of high quality housing in the area, providing flexibility and a wider choice of development opportunities to the market, and thus strengthening the local supply of housing land. It would facilitate enhancements to Mill Lane, and thus improve the approach to the village from the north, which would in turn encourage vehicles to reduce their speed earlier and increase highway safety. Should the site be allocated, it could be delivered in accordance with the need for development to deliver a minimum of a 10% increase in biodiversity, and would subsequently enhance the rural character and appearance of the site. Furthermore, pedestrian and cycle access to the recreation park would be provided, enhancing the permeability of the space and encouraging sustainable transport measures. Overall, any impact arising from residential development of the site could be suitably mitigated and improvements delivered.