

**Our Ref: 300177/CH/AW**

Sent by email to: [GNLP@norfolk.gov.uk](mailto:GNLP@norfolk.gov.uk)

13<sup>th</sup> December 2018

Dear Greater Norwich Planning Policy Team,

## **Greater Norwich Joint Local Plan – Regulation 18 Consultation**

**Site: Land North of High Green, Brooke & Land East of Wood Farm, Brooke**

**Site Reference: GNLP2119 & GNLP2122**

I write further to the current Regulation 18 consultation with respect to the Joint Local Plan and in particular to the above sites. We hereby submit comments with respect to the above site references, GNLP2119 comprising Land North of High Green, Brooke and GNLP2122 Land West of Wood Farm, High Green, Brooke and in response to the Site Proposals Document Addendum New, Revised and Small Sites document and Housing and Economic Land Availability Assessment (HELAA).

On behalf of our client we welcome and support the Council's decision and consideration that the sites represent suitable sites and options for future residential development as identified within the HELAA and Site Proposals Document Addendum for New, Revised and Small Sites. To supplement this though and address some of the points raised in the site appraisal we would wish to make the following comments.

### **1. GNLP2119 – Land North of High Green, Brooke**

#### **Suitability**

We would reiterate that the site is suitable for residential development being located adjacent to the settlement boundary and forming a natural extension to the village to the west. The site is within close proximity to services and facilities within Brooke which is a service village and should

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be allocated for growth in the emerging plan. As the Council note the site is accessible to these facilities and we would also highlight that none of the potential impacts or constraints identified in the HELAA cannot be overcome or mitigated against.

We note that the conclusions within the HELAA suitability analysis highlight some concerns raised by the Highway Authority with respect to the road network and access. With regards to the acceptability of the surrounding road network we note that the road network along High Green was considered by the Highways Authority and Local Planning Authority to be acceptable to accommodate a recent development of 13 dwellings (planning permission 2014/2041) just along High Green to the west.

With respect to pedestrian connections, the attached feasibility plan demonstrates that a 1.5 metre wide footpath is achievable along the north side of High Green from the site to Astley Cooper Place subject to minor carriageway realignment along the frontages of nos. 59, 61 and 63 High Green. The necessary works to provide a footpath connection from the site to the village can all be undertaken in the public highway without requiring third party land. Furthermore, this plan also demonstrates that if necessary some carriageway widening can take place within the adopted highway land. Any subsequent policy allocation for the site can include requirements for such off site highway improvements to be secured by way of a legal agreement or conditions.

With respect to access, consultation has taken place with NCC Highways Authority who have confirmed that visibility splays of 2.4m by 59 metres would be acceptable. The necessary visibility splays to the east and west can be provided within land owned by the applicant and the highway authority, as shown in attached drawing nos. 402884-30-001 and 402884-30-002. There is nothing out of the ordinary required to provide an acceptable access on to Norwich Road which is subject to a 30mph restriction. Indeed it is envisaged that any scheme coming forward would include off-site highway improvements including an extension to the 30mph speed restriction further west along High Green.

The HELAA analysis highlights potential constraints relating to the Brooke Conservation Area and nearby listed building at 66 High Green which sits to the southeast of the site. Given the surrounding context of the conservation area, the existence of residential development adjoining the conservation area to the north, south and west and intervening vegetation, development of the site would not impact on important views into and out of the conservation area.

With respect of the grade II listed thatched cottage we would highlight that much of its historic setting has been eroded by modern development to the north and to either side, and its current setting and context is now characterised by dwellings fronting High Green, in ribbon pattern and generally setback in mature landscaped gardens. The indicative masterplan attached has responded to the sensitivity of the dwelling by creating landscaped space and area of planting adjacent to this dwelling. Given the intervening vegetation and surrounding buildings along High Green subject to appropriate height, scale and design of development this would not be a constraint on development.

We note that a small part of the site that is at risk of surface water flooding as identified on the Environment Agency Flood Risk Maps. As the Council notes the site is of sufficient size with flexibility in the numbers of dwellings provided on the site to allow for the dwellings to be located outside of these areas. Otherwise, there is nothing to indicate that a standard approach to landscaping and SUDS techniques would not be able to mitigate for any potential impacts of site and minimise risk on and off site. Therefore, this would not be a constraint on development.

The fundamental considerations and impacts relating to transport and access, landscape, biodiversity, heritage and townscape implications can all be mitigated for and made acceptable. We would also highlight that this is a very realistic and attractive site to come forward being located in a semi-rural location, on the edge of the existing village, within walking distance that could be connected by a continuous footpath to the various facilities in the village including a school, playing fields, village shop. Therefore, the site represents a very suitable site for development to be included in the emerging plan.

### **Availability**

We also take the opportunity to reiterate that the site is available and owned by our client and there are no known legal restrictions to bringing the site forward in the short term and indeed that would prevent an immediate delivery of new homes.

### **Achievability**

We would highlight that the site is available now in freehold ownership of our client and there are no technical, legal, or viability constraints that would not prevent it from being developed within years 1 - 5. This is considered realistic for a site which is attractive being located on the edge of an existing village and within close proximity to local amenities including schools, shop and public houses. Indeed this provides for more than adequate flexibility in providing for any necessary improvements to the capacity of any necessary utility infrastructure to serve the development.

## **2. GNLP2122 – Land East of Wood Farm, Brooke**

### **Suitability**

We note that the conclusions and comments within the HELAA and Site proposals Addendum document for this site are very similar to those of site reference GNLP2119 that is discussed above. We therefore do not intend to repeat those representations above, but would reiterate that there are no potential impacts or constraints discussed within the suitability analysis cannot be suitably addressed, and therefore the site is suitable for residential development and the provision of a new primary school.

The site has been submitted and considered alongside GNLP2119 and when taken together with this adjacent site forms a natural extension to the western edge of the village that extends up to the built form at Wood Farm and no further north than the existing built form of the village to the east. The site would be able to provide land for a new purpose built primary school for the village and would be within close proximity to the various facilities within the village. The site is accessible to the bus services, shops, Brooke Primary School and employment facilities in the village and the proposals represent a sympathetic and logical extension to the built form of the village.

With respect to transport and access we would reiterate that the necessary works to provide a footpath connection from the site to the village can be undertaken in the public highway without requiring third party land. Furthermore, the attached plan (211962-501-P1) also demonstrates that if necessary some carriageway widening can take place within the adopted highway land. The necessary visibility splays to the east and west can be provided within land owned by the applicant and the highway authority and it is envisaged that as part of the site coming forward the existing 30mph speed restriction along High Green would be extended westwards with improved gateway features provided to the village. Any subsequent policy allocation for the site can include requirements for such off site highway improvements to be secured by way of a legal agreement or conditions as necessary.

We note that part of the site that is only a small part of the site at risk of surface water flooding as identified on the Environment Agency Flood Risk Maps. As the Council notes the dwellings can be located to avoid these areas. Otherwise, there is nothing to indicate that a standard approach to landscaping and SUDS techniques would not be able to mitigate for any potential impacts of site and minimise risk on and off site. Therefore, this would not be a constraint on development.

The other considerations relating to townscape, biodiversity; heritage, and utilities can all be mitigated for through the policy allocation and development process. None of these considerations are a constraint on development. Therefore, the site represents a very suitable site for development to be included in the emerging plan.

### **Availability**

We also take the opportunity to reiterate that the site is available and owned by our client and there are no known legal restrictions to bringing the site forward in the short term and indeed that would prevent an immediate delivery of new homes.

### **Achievability**

We would highlight that the site is available now in freehold ownership of our client and there are no technical, legal, or viability constraints that would not prevent it from being developed within years 1 - 5. This is considered realistic for a site which is attractive being located on the edge of an existing village and within close proximity to local amenities including schools, shop and public houses.

## **Summary**

With respect to site references GNLP2119 and GNLP2122 the applicant welcomes the Council's comments that the sites represent suitable site for future residential development within the village of Brooke. We highlight that there are no fundamental constraints or impacts that cannot be mitigated through the subsequent application and development process

We would stress that the proposals put forward in contrast to recent speculative applications and individual piecemeal development represents a real and substantial opportunity to help deliver a plan-led future for the village and local community. One that addresses the specific existing and future needs of the village in a more comprehensive and holistic manner, whilst delivering land for a school that would assist in the long-term sustainability of the community and at the same time seeks to minimise the environmental impacts of future development. We would therefore welcome your support for the inclusion of the above site in the emerging joint local plan.

Do please feel free to contact me should you have any queries regarding the above.

Yours sincerely

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