

Proposed Residential Development On land at Church Road, Woodton

Representations in respect of the South Norfolk Village Clusters Housing Allocations Plan (Reg 19 Draft)

on behalf of EA Mayhew and Sons Ltd, ESCO Developments Ltd
and Crocus Homes

Ref: 046939

Site ref: VC W001

REPRESENTATIONS TO VILLAGE CLUSTERS HOUSING ALLOCATIONS PLAN (REG 19 DRAFT)

Land at Church Road, Woodton (Ref: VC W001)

Introduction

1.1 Brown & Co are instructed by ESCO Developments Limited to respond to the pre-submission draft Village Clusters Housing Allocations Plan (VCHAP) that is currently at its Regulation 19 consultation stage. ESCO Developments are promoting the site to the south of Church Road – **Site ref VC W001**.

1.2 The Reg 19 VCHAP sets out the relevant Policy VC W001 as follows:

3.3ha of land is allocated for up to 50 dwellings.

The developer of the site will be required to ensure:

- Liaison with the Highways Authority to determine the extent of works required to the B1332/B1527 road junction as well as road widening along the site frontage;
- Provision of a pedestrian footpath to connect Woodton Primary School with The Street via the recreation ground, the site and Woodyard Square to the south;
- The provision of an area of land to be safeguarded for either education or recreational use in order to secure the continued and future pre-school provision within the village;
- Retention and protection of the existing Priority Habitat hedgerow along the east boundary of the site;
- Site layout and design to reflect the current open views across the site and protect the amenities of existing and future residents to the south of the site;
- Boundary treatments to contain the visual impact of the site, whilst reflecting the rural context;
- Early engagement with Anglian Water regarding the need to phase the site to address capacity issues with both the Water Recycling Centre and the local sewer network.

1.3 Representations have previously been made as part of the Greater Norwich Local Plan (GNLP). The VCHAP has now reached Regulation 19 of its preparation, and the purpose of this consultation relates to the ‘Tests of Soundness’ and includes legal compliance as set out in the National Planning Policy Framework. Representations to Regulation 19 can only be made in relation to the legal compliance and soundness of the Plan, in other words whether the Plan has been appropriately prepared in accordance with all relevant procedural and legal requirements, and whether it meets the tests of soundness within paragraph 35 of the National Planning Policy Framework (hereinafter ‘NPPF’).

The purpose of this representation is to:

- a) **Support** the continued allocation of the site for residential development and to confirm that ESCO developments and Crocus Homes are committed to working with the Council to deliver the aspirations as set out in draft Policy VC W001;
- b) **Object** to the specific wording of the proposed policy and propose alternative wording and seek amendments to the text to ensure that the policy is justified and effective; and

- c) **Respond** to other policies of relevance to delivering our proposals, where comment is necessary.

The VCHAP sets out three objectives:

Objective 1 – Meet housing needs. Deliver housing in accordance with GNLP housing target for the South Norfolk Village Clusters through the allocation of suitable, viable and deliverable development sites housing. (1200 new homes). Provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of life cycle e.g., first time buyers, those seeking family housing and those looking to downsize or move to more suitable accommodation in later life. Provide opportunities for ‘self-builds’ through the extension or amendment of settlement boundaries to allow ‘in-fill’ development in appropriate locations.

Objective 2 – Protecting village communities and support rural services and facilities. Provide opportunities for new housing development in a range of settlements within the village clusters, meeting the needs of a range of occupiers with the potential to support different local services and facilities and infrastructure where justified and appropriate.

Objective 3 – Protect the character of villages and their settings. Ensure that the scale, location and density of housing is well related to the form and character of existing villages, protects the historic environment, including protected landscapes, and ensures appropriate landscaping measures are delivered as part of new development.

1.4 It is considered that the draft VCHAP is basically sound, as the strategy proposed is essentially justified and effective and provides a range of sites by which growth can come forward. The site on land south of Church Road, offers a very good opportunity to deliver growth in a manner that is appropriate to the sustainable objectives of the emerging VCHAP and NPPF. By undertaking this form of development on this site in a sustainable manner it would support the emerging VCHAP.

2 Comments on the proposed strategy

Justified

2.1 The NPPF indicates that, to be justified, a Plan should set an appropriate strategy based on robust and credible evidence, with suitable consideration given to reasonable alternatives. It is considered that the proposed strategy is compatible with the overall purpose of the plan, in particular the delivery of sustainable development. The VCHAP aims to deliver sustainable growth in the villages of South Norfolk, the aim of which echoes Government planning policy set out in the NPPF. Paragraph 79 of the NPPF states that:

‘To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby’

2.2 We consider, therefore, that the strategy for the VCHAP should focus on delivering a range of opportunities for development across the village clusters to ensure the delivery of growth in a

sustainable manner. In essence, the growth needs to connect and enhance existing local services and access areas of open space and access to the countryside.

2.3 Woodton benefits from accessibility to a range of local services, and community facilities. The site is adjacent to a playing field, which in turn is adjacent to the primary school and Woodton has a frequent bus service to Norwich and Bungay but also accommodates a public house, village hall and recreational facilities.

2.4 In order to achieve sustainable development, more is required than delivering housing units. Rather, the focus is shifted to the creation of beautiful places and vibrant, resilient communities. Residential development on this site can deliver a range of housing opportunities as well as significantly contribute to the green infrastructure and enhance the ecological value of the area.

2.5 Furthermore, the creation of a residential development on this site would assist a modal shift from car reliance to walking and cycling through the creation of a truly walkable neighbourhood. The site provides new footpath links from the village to the primary school, thereby providing a safe walking route through the village and encouraging walking and cycling.

Effective

2.6 In order to be considered effective, the NPPF states that the proposed strategy should be deliverable over the plan period. We believe with a suitably designed scheme, which recognises the constraints of the site could be delivered in such a way as to minimise harm, with the community benefits it potentially would bring. The site is deliverable as it is available now and has a realistic prospect of delivering housing within five years.

2.7 The site is being advanced by a local promoter alongside a local developer who is keen to deliver residential development and construct this site and who has a track record of delivering appropriate, green led proposals. There are no significant physical constraints to the development of the site, and we remain confident that this site can deliver housing units early in the lifetime of the Plan.

2.8 Demonstrating deliverability is fundamental to achieving a sustainable, well-planned development. As has been evidenced with Local Plans across the country, proposed allocations, particularly those for large-scale housing, can falter where it is considered that sufficient work has not been undertaken to robustly demonstrate their viability or deliverability. In order to provide an effective strategy that would deliver the requisite housing within the plan period to meet local needs, it is considered necessary to provide a range of sites to create a number of outlets for growth to ensure growth is achieved through the Plan period.

2.9 The proposal site is within a single landownership, as a result there would be no disputes regarding which elements of the development come forward first, no time-consuming discussions around equalisation, and no negotiations over the distribution of infrastructure cost, all of which can cause significant delay and even permanently stall projects.

2.10 We are currently preparing a full planning application for the site which, at the time of writing, is going through public and parish consultation. which addresses the requirements of the emerging VCHAP policy including; drainage, design, landscaping, and highways. As such, we do not believe there are any obstacles in delivering this site. Attached as an appendix to these representations is an indicative layout that illustrates the proposed development which will be submitted as part of the forthcoming planning application.

3. Proposed amendments to Policy

3.1 We wish to see the following changes to the wording of the policy.

Policy VC W001: South of Church Road

We agree with the allocation of the site. However we believe the wording should be 'at least 50 dwellings'....

3.2 We are seeking amendments to the policy as we believe they are necessary for the development of the site. Whilst we appreciate that a calculation has been made in terms of the number of units on the site, in our experience the number of units can vary according to the manner in which it is undertaken. We would, therefore, seek to amend the wording to include 'at least'.

4. Conclusions

4.1 The VCHAP in its current form is considered to be sound as the strategy adequately delivers on the overall purpose of the plan in providing a range of development. We would support the distribution of growth insofar as it seeks to support the rural communities and sustain them for the foreseeable future. This is recognised in the draft VCHAP and we support this.

4.2 The proposed development would make a positive contribution to the provision of market and affordable housing in the area. The proposal 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.

4.3 ESCO developments are working with Crocus Homes, a respected local developer. Their high-quality designs and attention to detail result in exquisite homes, which pay homage to the local character whilst creating their own identity. Crocus Homes are keen to develop this site as soon as possible in order to meet local needs and demand.

4.4 We consider this form of development that comprises the draft allocation for this village, would result in real benefits for the community and provide housing in a holistic and sustainable way in order to create a vibrant community.



Figure 1: indicative layout