

## **GNLP – REGULATION 18(C) CONSULTATION RESPONSE**

### **GNLP2176 – LAND NORTH OF DEREHAM ROAD, HONINGHAM**

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On behalf of the Rampton Property Trust, we strongly support the preferred allocation of GNLP2176, Land North of Dereham Road, Honingham. The site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2038.

GNLP2176 has been identified as a preferred allocation for at least 12 dwellings, of which 33% will be affordable. It is recognised that more homes may be accommodated on the site, subject to an acceptable design and layout, as well as infrastructure constraints. The preferred allocation recognises that development is expected to achieve vehicular access onto Dereham Road, with a suitability splay and frontage development; provision of a 2.0m footway and carriageway widening to 5.5m; consideration of the Source Protection Zone 3 when developing a drainage strategy; and, a design and layout which minimises adverse impacts on the nearby heritage assets.

In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the proposed allocation represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable. This, as well the ability to of the site to satisfy the requirement of Policy GNLP2176, is considered in further detail below.

#### **Assessment of Delivery**

##### ***Suitable***

Honingham and Easton are jointly designated as a village cluster in the draft GNLP, with Easton being an urban fringe settlement, identified for major growth. Honingham and Easton form a cluster as Honingham falls within the primary school catchment of Easton. Honingham benefits from a village hall, a pub, and a car garage, in close proximity to the site. As part of the Easton Growth Masterplan, a new village hall, extended primary school and retail store are proposed. Honingham also benefits from being approximately 3.5 miles from Longwater Retail Park, which provides a range of retail opportunities, including a supermarket.

As a result, an allocations of at least 12 new dwellings is proposed for Easton and Honingham, with the East Growth Masterplan allocation of 1,044 dwellings being carried forward.

Given the suitability of the village cluster of Honingham and Easton, the identification of the site will help achieve the GNLP's aspirations of focusing growth in village locations to promote social sustainability by supporting rural life and services. Therefore, the site will help the GNLP's target of 9% of total housing growth being within Village Clusters (480 dwellings in Broadland).

The following commentary demonstrates the suitability of the site having regard to technical matters, whilst responding to the points raised in the preferred allocation's wording.

##### ***Density and Quantum of Development***

The preferred allocation identifies the site as being suitable to accommodate at least 12 dwellings. However, the preferred allocation also suggests that more homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints being addressed.

Based on 12 dwellings and the identified site area of 0.76 ha, the density of the development equates to 16 dwellings per hectare. However, this density is lower than the indicative minimum densities set out in Policy 2 of the draft GNLP, which seeks a minimum of 25 dwellings per hectare to make efficient use of land (subject to site specific constraints).

On this basis, it is evident that whilst the site can comfortably accommodate the minimum number of units identified by the preferred allocation. However, through incorporating additional land to the north of the site, it has the potential to accommodate additional development (i.e. 25 dwellings or more). In addition, in order to create a logical boundary to the village, it is suggested that the red line is relocated further north (between the north-eastern boundary of 46 Dereham Road and the north-western edge of the village hall). Based on the revised red line boundary, the amended site area totals 1.37 ha.

Furthermore, the site could accommodate additional growth, above the 25 dwellings proposed, if it becomes evident that other sites across the GNLP area are undeliverable. It is, for example, noted that there is doubt surrounding the deliverability of the Carrow Works site, which is a preferred allocation for 1,200 dwellings, in the draft GNLP. As detailed above, Honingham is a sustainable location for growth which has experienced relatively limited growth in recent years, and has the opportunity to benefit from its location within close proximity of the Cambridge Norwich Tech Corridor.

### *Access, Transport and Roads*

An Access Appraisal has been prepared by Orari Ltd. The Access Note concludes that there are no highway safety issues to preclude the use of the site for residential development, and that there is a good range of bus services with provide future residents of the site a convenient alternative to the use of private cars.

With regards to access design, it is demonstrated how Dereham Road may be widened to a minimum width of 5.5m, and a 2m footway may be provided along the site's frontage, in accordance with the preferred site allocation's requirements.

It is recognised in the Appraisal that the physical curvature of Dereham Road influences the location of the site's access road. As a result, there is one location available which provides DMRB compliant visibility splays of 2.4m x 90m. Two further potential locations exist that accord with Manual for Streets visibility splays of 2.4m x 59m.

Due to the curvature of Dereham Road, the Appraisal confirms that the preferred allocation's aspirations of frontage dwellings with individual/shared drives directly onto Dereham Road may not be possible. As such, the Indicative Layout demonstrates how frontage development, from the single point of access to the site can still be achieved, by way of private drives, parallel to Dereham Road. This ensures that frontage development is achieved, whilst avoiding the need for multiple points of access to the site.

Given the curvature of Dereham Road, for highway safety reasons, the site will need to be designed to ensure that all dwellings are accessed from within the site's curtilage; no direct pedestrian access is provided from any dwelling onto Dereham Road (to discourage visitors/delivery parking on Dereham Road); and, the visibility splays will need to be regularly mown and maintained.

Based on the provision of 20 dwellings on the site, vehicle trip generation has been calculated based on the TRICS database. In the AM peak, the development is likely to result in 15 vehicle trips. In the PM peak, the site is likely to result in 14 vehicle trips. Across the day, the development is likely to result in 118 vehicle movements. The Appraisal considers that additional residential vehicle movements are unlikely to have any measurable impact upon traffic flows on Dereham Road and the local Honingham highway network during the AM and PM peak periods.

Accordingly, the Appraisal confirms that there are no transport and highway reasons as to why the site should not be allocated for 25 dwellings. Therefore, the Appraisal demonstrates that the proposed access strategy is in accordance with the specific requirements of the preferred allocation, such as appropriate visibility splays, road widening on Dereham Road along the site's frontage to 5.5m, and provision of 2m footpaths along Dereham Road.

### *Layout and Design*

An Indicative Masterplan has been prepared by Feilden and Mawson, demonstrating how, if required, 25 dwellings can be comfortably accommodated on the site and is submitted in support of this Representation. The point of access to the site has been informed by the Access Appraisal, as previously outlined. A series of four private drives are proposed off a Type 3 internal access road, helping to create a high quality layout which is akin to the character of Honingham.

In addition to the above, the layout is designed around two areas of public open space, either side of the internal access road, adjacent to Dereham Road. Locating public open spaces in the south-eastern corner of the site helps to mitigate the impact of development on the site on heritage assets in the centre of Honingham.

Despite the requirement for frontage development in the preferred allocation, the Access Appraisal confirmed that this is not achievable due to access constraints (notably, achieving appropriate visibility splays). On this basis, the layout has been designed to achieve frontage style development, with 9 dwellings overlooking Dereham Road, situated off two private drives. This achieves the overarching aspiration of frontage development to help reduce vehicular speeds, without the need to private multiple access points to each property.

The larger scheme has been evolved by architects Feilden & Mawson in consultation with local developer FW Properties. It has been based upon an appropriate mix of new properties including smaller 2 and 3 bedroom houses and bungalows.

*Deliverability and Proposed Housing Trajectory*

The following Housing Trajectory has been based on robust local evidence, including the completion of a range of similar scale developments across the District.

Based on the submission of a planning application in 2022, to tie in with submission of the Local Plan, 6-9 months have been allowed for the determination of the planning application, alongside a further 6 months to commence construction on the site.

Assuming construction commences on site in 2024, it is assumed that the development would be complete in 2025; well within the first five years of the Local Plan period. The Housing Trajectory has been based on the site accommodating 25 dwellings.

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Units</b>	0	0	25	0	0	0	0	0	0	0	0	0	0	0	0
<b>Cumulative Total</b>	0	0	25	25	25	25	25	25	25	25	25	25	25	25	25

The Rampton Property Trust are committed to securing development on the site, and are in discussions with a local developer who has expressed interested in acquiring the site. FW Properties are a local developer who are based in Norwich who specialise in the development of good quality residential developments in Norfolk and Suffolk. They have successfully completed many developments in the area including new homes in Brooke, Wreningham, Alington, Bergh Apton and Rockland St Mary. They are currently on site with 25 new homes in Hoveton and will shortly be commencing the development of 23 new dwellings in Hempnall. Please see their website at [www.fw-properties.com](http://www.fw-properties.com).

**Available**

The site, in its entirety, is owned by the Rampton Property Trust. The land is leased to a local farmer on a temporary basis, and can be terminated with the agreed notice period at any time.

**Achievable**

Based on the suitability assessment above, there are no site-specific constraints which could threaten the delivery of residential development on the site. Therefore, residential development on the site is deemed to be entirely achievable.

**Viable**

The Rampton Property Trust are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site. This statement is, however, made in the context of the questions that have been raised in relation to Greater Norwich Local Plan Interim Viability Study (2019) (Question 48). Further discussions are required with the GNLP Team

on these matters in order to confirm that the various policy objectives, such as affordable housing and community infrastructure, can be delivered on site without prejudicing the viability of the site. The Rampton Property Trust are keen to continue discussions with the GNLP Team on this matter asap.

## Summary

The cluster of Honingham and Easton is a sustainable location for growth, benefitting from existing and expanding facilities, such as a primary school and public transport provision.

As has been demonstrated, the site is suitable, available, achievable and viable, and is deliverable within the first five years of the plan period. As previously recognised, there are no constraints which would affect the suitability of the site for residential development. In addition, this Representation has demonstrated the suitability of the site to accommodate at least 25 dwellings, or more development, if required. Accordingly, the foregoing text demonstrates that this specific site is a suitable location for further development, and Rampton Property Trust supports the GNLP's proposals to allocate the site under Policy GNLP2176 for residential development.

## Revised Policy Wording

**Policy GNLP20176 – Land North of Dereham Road, Honingham (approx. ~~0.76~~ 1.37 ha) is allocated for residential development. The site will accommodate at least ~~42 homes~~ 25 homes, 33% of which will be affordable.**

More homes may be accommodated, subject to an acceptable design and layout being achieved, as well as infrastructure constraints.

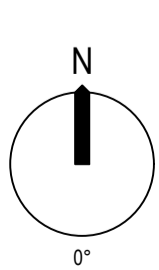
The development will be expected to address the following specific matters:

- Vehicular access onto Dereham Road, with a suitable visibility splay, and a frontage design layout (without providing individual driveways) that reinforces the existing 30 MPH speed limit.
- Provision of 2.0m wide footways and carriageway widening to 5.5m for the full extent of the frontage.
- The site is within Source Protection Zone 3 and this should be taken into consideration when developing a drainage strategy.
- A design and layout that minimises adverse impact on the nearby heritage assets, notably the listed cottages and war memorial along the Street.

## Key

Amendment – Proposed Amendments

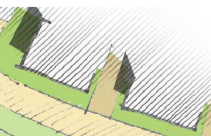


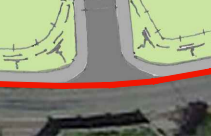
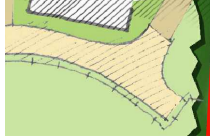
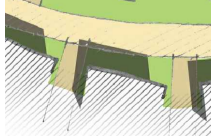
~~Deleted~~ – Proposed Text to be Removed



Rev	Date	CHK	DRW	Revision Description
A00	10.03.20	je	je	Issue for allocation purposes

REF	HEALTH AND SAFETY INFORMATION - CONSTRUCTION RISKS
XXX	

**Legend**

-  Proposed building parcels
-  Public Open Space
-  Site Extent shown red [1.356ha]
-  Type 3 access road
-  Shared-surface private roads
-  Private drives

**Feilden+Mawson**

21-27 Lamb's Conduit Street London WC1N 3NL tel: 020 7841 1980  
 1 Ferry Road Norwich NR1 1SU tel: 01603 626271  
 6 Clifton Court Cambridge CB1 7BN tel: 01223 350567  
 email: info@feildenmawson.com www.feildenmawson.com

DRAWING  
 Proposed Site Allocation  
 Concept Masterplan

CLIENT FW Properties  
 JOB Land off Dereham Road, Honingham

RIBA Stage 0			
S2	Issue for Information		
JOB 9225	PAPER A1/A3	SCALE	500/1000

Drawing Number  
**9225- FM- XX- XX- DR- A- SK01- A00**