



**GNLP Regulation 18 Consultation Response
March 2018**

**Land to the South of School Lane, Little Melton
Site References: GNLP0477 and GNLP0495**

Table of Contents

1. Executive Summary	3
2. Site Introduction and Description.....	5
3. Site Location	7
4. Site Opportunities	8
5. Consultation Questions.....	14
6. Site Suitability Assessment	32
7. Conclusions	38
8. Next Steps	39

1. Executive Summary

These representations are submitted on behalf of Glavenhill (Number 8) Limited (Glavenhill) in response to the Greater Norwich Local Plan Regulation 18 Consultation and relate primarily to Land to the south of School Lane, Little Melton (hereon referred to as the proposed allocation site) (see Section 3 for site extent).

These representations follow on from the Site's submission to the 'call for sites' consultation in July 2016.

The Site was promoted at that time as two separate land parcels (the northern land parcel which is located to the immediate south of School Lane was promoted as 'Little Melton 1' and the land parcel to the immediate east of Burnthouse Lane was promoted as 'Little Melton 2').

Both sites have been considered by the Greater Norwich Growth Board and are assessed for their suitability for residential development within the Housing and Employment Land Availability Assessment (December 2017) (HELAA) which is released in support of this Regulation 18 Consultation under site references: GNLP0495 and GNLP0477, respectively.

The sites have since the Call for Sites exercise been combined and refined in their extent and have been assessed by Glavenhill for their suitability for housing in their combined form. The resulting site (as shown at Section 3) is currently the subject of an outline planning application for residential development. The application is pending determination with no outstanding technical objections from statutory consultees. The application documentation and consultee responses submitted and received to date, are referred to in these representations as demonstration of the site's suitability and deliverability for residential use and to assist in clarifying the queries raised by the Greater Norwich Growth Board on the site within the HELAA.

Glavenhill has considered the Draft Greater Norwich Local Plan and provide comment on the suitability or otherwise of the proposed Growth Options, including the level and distribution of this growth. Glavenhill has serious concerns over the Greater Norwich Growth Board's (GNGB) calculation of the overall housing requirement and provide a suggested alternative requirement.

It is Glavenhill's submission that the proposed housing growth is best accommodated through the allocation of a new settlement in the Cambridge-Norwich Tech Corridor, alongside a range of less strategic sites that should be located in sustainable locations in and around existing sustainable settlements.

The allocation of Land to the south of School Lane, Little Melton should form part of that Strategy.

The proposed allocation site has been demonstrated through the planning application process to be sustainably located on the edge of the Service Village of Little Melton and within the Norwich

Policy Area. The site is an appropriate and sustainable place to accommodate new housing development.

Contrary to the conclusions of the HELAA, the proposed allocation site has been demonstrated through the planning application process to be safely accessed via School Lane and not to have a severe impact upon the local transport network. There is sufficient capacity within the local utility network to accommodate residential development at the site and the impact of such development on the local townscape can be effectively controlled.

There are no overriding constraints that would prevent the site from being developed for housing within the early stages of the Plan Period and Glavenhill respectfully request it be allocated within the emerging Local Plan.

2. Site Introduction and Description

Introduction

These representations are submitted of behalf of Glavenhill (Number 8) Limited (Glavenhill) in response to the Greater Norwich Local Plan Regulation 18 Consultation and relate primarily to Land to the south of School Lane, Little Melton (hereon in referred to as the 'proposed allocation site') (see Section 3 for site extent).

These representations follow on from the proposed allocation site's submission to the 'call for sites' consultation in July 2016.

The site was promoted at that time as two separate land parcels (the northern land parcel which is located to the immediate south of School Lane was promoted as 'Little Melton 1' and the land parcel to the immediate east of Burnthouse Lane was promoted as 'Little Melton 2').

Both sites have been considered by the Greater Norwich Growth Board (GNGB) and are assessed for their suitability for residential development within the Housing and Employment Land Availability Assessment (December 2017) (HELAA) which is released in support of this Regulation 18 Consultation under site references: GNLP0495 and GNLP0477, respectfully.

The sites have since the Call for Sites exercise been combined and refined in their extent and have been assessed by Glavenhill for their suitability for housing in their combined form. The resulting proposed allocation site (as shown on **Figure 1** at Section 3) is currently the subject of an outline planning application for residential development (LPA reference 2017/2843). The application is pending determination with no outstanding technical objections from statutory consultees. The application documentation and consultee responses submitted and received to date are referred to in these representations as demonstration of the site's suitability and deliverability for residential use and to assist in clarifying the queries raised by the GNGB on the site within the HELAA.

The planning application documentation is not enclosed with these representations due to its size but can be obtained from South Norfolk's Public Access database under the aforementioned planning application reference.

Site and Surroundings

The proposed allocation site is located to the southern side of the village of Little Melton within the District of South Norfolk.

The proposed allocation site comprises two connected land parcels within the same, single ownership. The northern parcel is bound by School Lane to the north, a well established hedge and tree belt and the Village Apartments holiday complex beyond to the south and east and a residential property and its curtilage (20 School Lane) to the west.

The northern parcel is joined to the southern parcel by an area of grassland to the rear of no. 20 School Lane.

The southern parcel is larger in area and is bound to the north by well established scrub land of some ecological value and residential properties beyond. The western boundary is delineated by a well established hedgerow with Burnthouse Lane beyond. The southern boundary is currently unmarked. The eastern boundary is marked by a well established tree and hedge line with the Village Apartments beyond.

There are no ecological designations on the proposed allocation site.

There are no listed buildings on the proposed allocation site, albeit the barn at Elm Farm to the immediate east of the site, is Grade II Listed. The site is not located within or in close proximity to, a conservation area.

The proposed allocation site is located in Flood Zone 1 and is at low risk of flooding.

3. Site Location



Figure 1 – Site Location Plan

4. Site Opportunities

Deliverability

The proposed allocation site is sustainable and appropriate for residential development in the short term.

The site is in single ownership and is being promoted for residential development by Glavenhill Strategic Land (Number 8) Limited.

The site is logically and sustainably located to the immediate south of the service village of Little Melton and is within easy walking distance of the services and facilities within the settlement. The provision of this modest and sustainable residential extension to the village has the propensity to support local facilities to the benefit of the settlement's vitality and viability.

The proposed allocation site is currently the subject of an outline planning application for residential development. The application has been informed and is supported by a number of technical assessments which demonstrate its appropriateness for development.

The outline application fixes the point of access into the site from School Lane which is detailed on the submitted access drawing (see **Figure 2** below and replicated at **Appendix 2**).

Design and Site Capacity

A masterplanning process has also been carried out for the proposed allocation site, founded on a thorough analysis of the site and its surroundings.

The illustrative masterplan (enclosed at **Figure 3** below) shows how residential development can be appropriately and sustainably achieved on the proposed allocation site whilst respecting the site's environmental context. It also demonstrates how development may respect the residential and visual amenities of nearby residents and the wider area to deliver a mixed and balanced residential community.

Consideration has also been given to impact of development on the local landscape and how through the provision of appropriate design the local character and biodiversity of the area may be enhanced.

Provision is made within the illustrative masterplan for new and improved boundary treatment in order to assimilate any future residential development at the proposed allocation site within its surroundings.

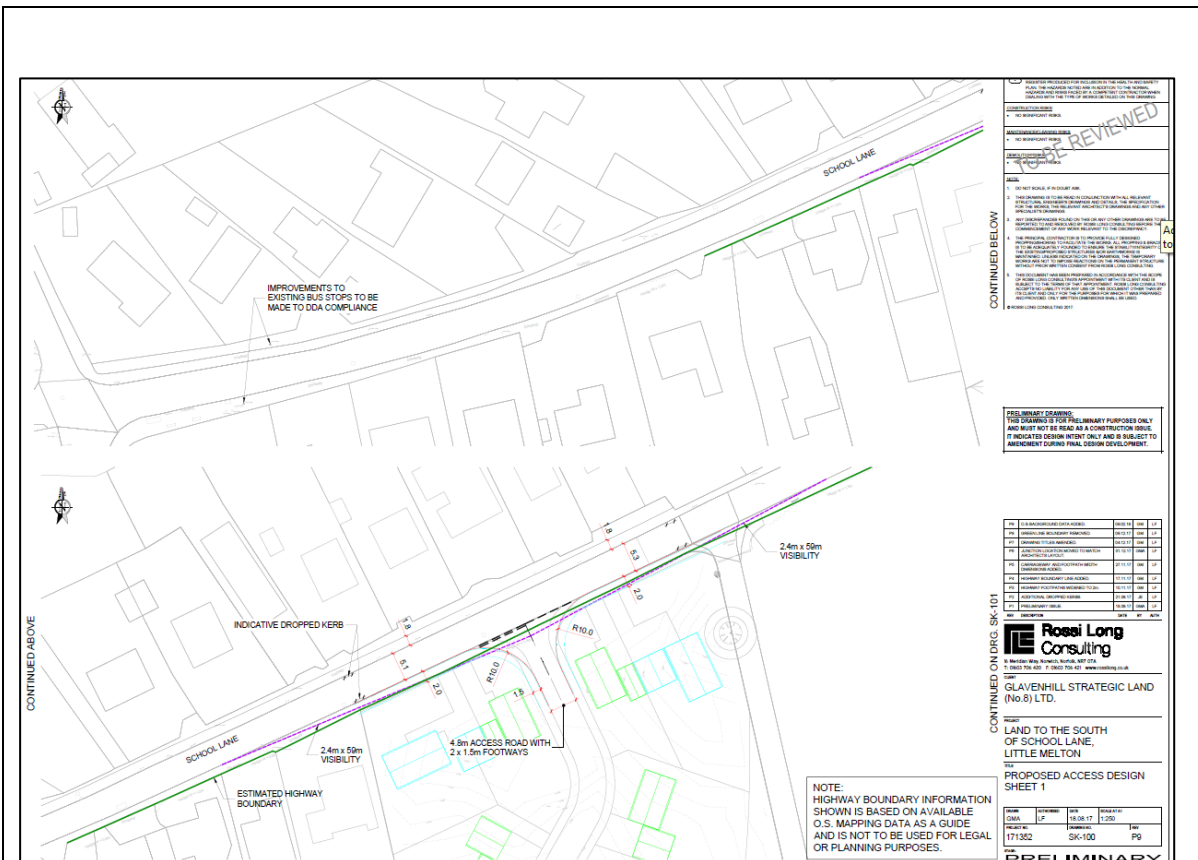


Figure 2 - Site Access Plan (replicated at Appendix 1)



Figure 3 – Current Illustrative Masterplan

Landscape, Trees and Ecology

Specific attention has been given to the impact of developing the proposed allocation site on views from the south and the illustrative masterplan submitted in support of the outline application shows how a strong and defensible hedge / tree belt along the site's southern limit and the retention and supplementing of existing boundaries, can deliver a defensible limit to the extended settlement.

A tree and hedgerow survey has been undertaken and is submitted in support of the outline planning application. The survey shows how the proposed allocation site may be developed for residential use whilst retaining existing trees and woodland areas (to the perimeter of the site). The existing hedgerow located on the northern boundary of the site, adjacent to School Lane has also been assessed to be of limited value. Its removal and the potential to provide new hedging

(setback behind the visibility splays to the proposed access) as part of any future residential development has been demonstrated as appropriate within the survey.

A series of ecological assessments have been undertaken at the proposed allocation site. The results are presented in an Ecological Impact Assessment which accompanies the outline planning application.

The proposed allocation site comprises two connected grassland fields with vegetated boundaries including scrub cover, hedgerows and broad-leaved and coniferous trees. Collectively the habitats within the proposed allocation site are assessed to be of lower value at up to the Parish level.

Based on the habitat types present, the proposed allocation site has the potential to support amphibians (including great crested newt), reptiles, breeding birds and bats.

In the absence of mitigation, the development of the proposed allocation site for housing would give rise to a loss of improved grassland in the internal areas of the site as well as some minor loss of boundary hedgerow for site access. This would give rise to a minor adverse impact upon habitats and species.

The Assessment demonstrates however, that mitigation is possible through the provision of landscape buffers and significant new areas of biodiversity enhancement (shown to the north and south of the southern land parcel on the illustrative masterplan).

Overall, it is possible through the development of the proposed allocation site to deliver considerable ecological enhancements to the benefit of the site and the wider area.

Norfolk County Council's Green Infrastructure Officer provides no objection to the outline application on ecological grounds.

Transport and Access

A Transport Statement has been submitted in support of the outline planning application and demonstrates that the proposed allocation site can be safely and appropriately accessed in capacity and performance terms from a single point of access off School Lane.

The Statement shows that traffic associated with the outline planning application can be safely and efficiently accommodated without a severe impact on the wider highway network.

Additional improvements to safety and accessibility along School Lane are being considered as part of the application and include improvements to two bus stops on the junction of School Lane and Burnthouse Lane; and the provision of a temporary 20mph speed limit sign on School Lane in proximity to the site entrance. The County Highway Authority provide no objection to the proposed point of access.

Heritage

The proposed allocation site is located close to a Grade II Listed barn at Elm Farm and the impact of residential development upon the setting of the barn is assessed within the Heritage Statement that is submitted in support of the outline application.

The Statement concludes that the development of the proposed allocation site will not harm the main elements of the barn that contribute to its significance, although they will remove a part of the barn's wider agricultural setting and historic links with this piece of land.

These aspects are, however, only considered to make a very slight contribution to the significance of the barn and the proposed development has been designed to minimise any visual impact upon the barn.

Therefore, any harm to the significance of the heritage asset will fall well below the 'less than substantial' harm threshold set out in paragraph 134 of the Framework.

An archaeological desk-based assessment is submitted in support of the outline planning application. This assessment was supplemented by trial trenching which confirmed the presence of archaeological remains but nothing of such significance that would warrant retention in situ. The archaeological potential of the site does not affect its suitability for residential development or necessitate revisiting the illustrative masterplan.

Ground Conditions, Flood Risk and Drainage

The existing ground conditions have been assessed across the proposed allocation site within a Phase 1 Geo-environmental Desk Assessment which is submitted in support of the outline application.

The Assessment confirms that the overall contamination risk of the site is 'low' and that the risk to development from foundation complexity is also 'low'.

As such, there is nothing in relation to the stability or contamination to suggest that the proposed allocation site is unsuitable for residential allocation.

The flood risk potential of the site and the means by which to ensure the proposed development does not result in additional risks elsewhere (through the application of appropriate drainage methods) is assessed in the Flood Risk Assessment and Drainage Strategy Report that is submitted in support of the outline application.

The Assessment confirms that the proposed allocation site is located within Flood Zone 1, at low risk of flooding.

Infiltration testing at the proposed allocation site has confirmed that infiltration is possible and surface water can be managed by way of a series of soakaways. The Lead Local Flood Authority provide no objection to the draft drainage strategy provided alongside the outline application.

Anglian Water records confirm that the foul sewer and local treatment works have capacity to accommodate the proposed development.

The Utilities Statement submitted in support of the outline application confirms that there are no services or utilities within the application site that require diversion to facilitate development.

Conclusion

In conclusion, the suitability and deliverability of the site for residential development has been demonstrated through the outline planning application process.

The results of the site specific survey work are summarised in Section 6 of this report and are used with reference to the GNGB's suitability criteria (presented in the HELAA) to demonstrate the site's appropriateness for allocation for residential use within the GNLP.

5. Consultation Questions

The following section provides Glavenhill's response to the various questions posed on the draft GNLP within the Greater Norwich Local Plan Growth Options Document with specific reference to the proposed allocation site at Little Melton.

Section 3 – The Vision and Objectives for Greater Norwich

1. Do you agree with the draft vision and objectives for the plan below?

Glavenhill broadly agree with the vision and objectives for Greater Norwich to 2036 as set out at Figure 1, which place considerable emphasis on the promotion of development and growth within the Plan Area, subject to our more detailed representations on specific issues (below).

Section 4 – The Strategy Delivering jobs, homes and infrastructure

2. Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1-4.7?

The Greater Norwich Local Plan is an opportunity to build on the significant existing attributes of the Plan Area to make the wider Norwich area a hub for investment, commercial activity and high-quality place making, which will be of benefit to all who live and work there.

Glavenhill welcome the joint working of the different authorities, who are leading the Plan Making process, and provide a strategic view to Plan Making which is essential to the future prosperity of the Greater Norwich area.

The Greater Norwich Local Plan Review provides a unique opportunity to deliver a comprehensive and conjoined approach to delivering growth.

The Strategy gives appropriate recognition to the need for growth and investment, particularly in key infrastructure.

There is a need for the Greater Norwich area to benefit from the economic growth of the greater Cambridge area and not be left behind. Greater Norwich, at the very least, must protect its economic position within the eastern region.

The draft Strategy recognises the positive attributes of the Greater Norwich area. However, to ensure a bright and prosperous future, an ambitious strategy is essential.

Glavenhill so however, have serious concerns over the Greater Norwich Growth Board's (GNGB) calculation of the overall housing requirement for the plan period (set out in answer to Question 4 below). The favoured option must be to deliver forecast jobs growth plus additional growth.

Glavenhill are of the view that a realistic assessment of the requirement would lead to a figure in the order of 11,000 new homes over the Plan Period to 2036 in order to deliver on the aspirations of the City Deal.

It is Glavenhill's submission that the proposed housing growth is best accommodated through the allocation of a new settlement in the Cambridge-Norwich Tech Corridor, alongside a range of less strategic sites that should to be located in sustainable locations in and around existing sustainable settlements.

The allocation of Land to the South of School Lane, Little Melton should form part of that Strategy.

Job Targets

3. Which option do you support for jobs growth? (refers to options on pg.28)

Recognition is given within the Greater Norwich Local Plan (GNLP) Regulation 18 consultation document (the GNLP) to the positive attributes of the Greater Norwich area. However, to ensure a bright and prosperous future for the Plan Area, an ambitious strategy to growth and investment is essential.

The Greater Norwich Local Plan provides an opportunity to make the wider Greater Norwich area a hub for investment, commercial activity and high-quality place making, which will be of benefit to all who live and work there.

The favoured option must, therefore be to deliver forecast jobs growth plus additional growth (Option JT1).

Calculating the Housing Numbers for the Plan

4. Do you agree that the OAN for 2017-2036 is around 39,000 homes?

Glavenhill broadly support Growth Option 3 to support the Cambridge-Norwich hi-tech corridor. However, the overall housing requirement number of 7,200 dwellings derived from an OAN of around 39,000 homes is considered too low.

The GNLP 2016 call for sites consultation suggested that around 12,000 new homes were needed across the Plan Period. Lanpro is surprised that this figure has reduced so significantly to 7,200 homes. We do not (for the reasons set out below) consider this figure sufficient to meet the housing requirement for the Greater Norwich area for the period to 2036.

Glavenhill do not support the use of the Government's proposed methodology for the calculation of OAN as set out in the consultation paper 'Planning for the Right Homes in the Right Places' in its current form. The methodology is still at the consultation stage and has been subject to a significant number of objections e.g. from the Planning Officers Society, Homebuilders Federation and the RTPI. One concern with the proposed methodology is its failure to consider economic

objectives. There is no certainty that this methodology will come into effect, either in its current form, or at all and cannot be relied upon as the sole basis for calculating the OAN.

Glavenhill do not support the figure of 7,200 homes arising from the use of the draft Government methodology for the calculation of housing numbers. Para 4.17 of the GNLP states that the OAN figure for the Greater Norwich area is 38,988 dwellings for 2017 - 2036 based upon this methodology. This figure should be used with caution because it uses figures taken from the 'Application of proposed formula for assessing housing need, with contextual data' table that accompanies the Government Consultation document. This is an indicative assessment of required dwellings per annum based upon a draft formula for the period 2016-2026, (rather than for the period 2017 -2036). Furthermore, it fails to consider economic objectives for the area.

The calculation of the OAN should in any event, be regarded a starting point for calculating housing numbers for the GNLP. The Government's OAN figure does not include the housing necessary to deliver economic objectives via the City Deal which has been agreed with Central Government in order to help turn knowledge into growth and 13,000 additional jobs'.

Delivery of these objectives is necessary to ensure that the area is eligible to receive the related Government funding for infrastructure and business support, enterprise and innovation. It is important that the City Deal requirements are included as they have already been committed to and will contribute to the Greater Norwich and wider economy.

Plan makers are entitled to utilise different methods for assessing need and if these produce figures that are higher, the Government proposes that Inspectors should consider such approaches sound unless there are compelling reasons to indicate otherwise. Therefore, where it is sensible to propose higher figures based upon employment growth or higher affordable housing needs, there is scope to do this and the "significant contribution" that Government sees the City Deal making "to the recovery and future growth of the UK economy" (source: Greater Norwich City Deal) is valid justification for this.

Furthermore, paragraph 158 of the National Planning Policy Framework (the Framework) requires that Local Plans to ensure that strategies for housing and employment set out in their plans are integrated and take full account of relevant market and economic signals. Not including the City Deal requirements would fail to meet this requirement.

If the City Deal housing requirements are added to the Government OAN figures, the housing requirement for the period 2017-2036 should be as follows:

Government OAN figure 2017-2036:	38,988
Minus commitments of:	35,665
Sub Total:	3,323
Plus, City Deal Housing Requirement from 2017 SHMA (SHMA fig:101)	8,361
Subtotal:	11,684
Plus 20% buffer (see qu6 reasoning below):	2337
TOTAL HOUSING REQUIREMENT (2017-2036):	14,021

Glavenhill consider that the up to date calculation of housing need within the Central Norfolk Strategic Housing Market Assessment (June 2017) (the SMHA) should be used until the Government's methodology is formally put into practice.

The SHMA sets out a Policy-on full objectively assessed need for housing for the period 2015-36 for the Greater Norwich Area of 44,714 including the City Deal housing requirement (Figure 96: SHMA). This would indicate a residual requirement of 10,859 homes 2015-2036 taking into account a 20% buffer:

Policy-on SHMA OAN figure including City Deal:	44,714
Minus commitments of:	35,665
Subtotal:	9,049
Plus 20% buffer (see qu6 reasoning):	1810
TOTAL HOUSING REQUIREMENT (2015-2036):	10,859

Paragraph 5.7 of the SHMA states:

“We would note that in the Central Norfolk SHMA 2015, the potential impact of the City Deal was considered part of the OAN, but greater clarity now indicates that it is an aspirational jobs target which should be treated as part of the housing requirement not the OAN.”

It is important that the City Deal requirements are not ignored and are included in the final housing requirement figure as they have already been committed to and will contribute to the Greater Norwich and wider economy. This should be the case whether the Government or SHMA OAN methodology is used.

Both scenarios suggest that the housing requirement to 2036 should be significantly higher than the 7,200 homes specified in the Growth Options Document and a figure in the order of 11,000 would be more appropriate.

The Growth Options Document is unclear about the proposed base date of the plan and Glavenhill consider that clarity on this is required once the OAN methodology is confirmed. Rebasing the start date of the Local Plan to 2017, should not be used as an excuse to reduce previous backlog. Both above methodologies are set to different plan start dates, but both are intended to take into account previous backlog in assessing the housing requirement going forward.

Glavenhill also question the deliverability of some of the existing 35,665 homes committed to through existing allocations and or permissions and further consideration should be given to these sites to ensure that a robust figure is used in the calculation of the housing requirement.

5. Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?

The figure of 7,200 homes is considered too low for the reasons set out above and because a 10% delivery buffer is too low. This is particularly the case bearing in mind the track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current Joint Core Strategy. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area. Whichever of the 6 growth options, or variations on them is finally chosen, it is likely that the vast majority of housing will be allocated in locations in and around Norwich because this is a sustainable model for future growth. All of the growth options show over 70% of housing located within the Norwich Policy Area.

Glavenhill consider that in order to ensure competition and choice in the availability of housing land and reduce the future likelihood of lack of 5-year supply, a 20% buffer should be added to the OAN figures for the purposes of calculating the housing requirement. Windfalls should not be relied upon to make up any shortfalls. (see question 6 for more information).

6. Do you agree that windfall development should be in addition to the 7,200 homes?

Paragraph 4.24 of the GNLP states that “based upon current trends and projected future delivery, it is estimated that an additional supply of up to 5,600 dwellings could be provided during the plan period on “windfall” sites”.

Glavenhill contend that this is an over estimate. Recent trends have been very much influenced by the lack of 5-year housing land supply within the Norwich Policy Area. If during the new plan period there is no longer a shortage of 5-year land supply, then the amount of housing delivered through windfall sites will be significantly reduced.

Windfall development in recent years has been dependent upon the availability of unallocated brownfield sites within the city and other towns. Due to the emphasis on brownfield development in recent years, this source of windfall sites is also likely to be reduced during the new Plan Period. As such, the Strategy for the distribution of new housing should not rely upon significant amounts of windfall coming forward within the plan period to deliver the required housing numbers. Windfall should be in addition to the final housing requirement number chosen.

Delivering Infrastructure

7. Are there any infrastructure requirements needed to support the overall scale of growth?

Inevitably, with any significant housing and employment growth, there will be supporting infrastructure requirements. It is essential that these are properly planned for at the outset. Opportunities for better public transport linkages, including rail and bus also need to be properly considered.

How should Greater Norwich grow?

Existing Housing Commitment

8. Is there any evidence that the existing housing commitment will not be delivered by 2036?

The existing housing commitment, which comprises allocations in the Joint Core Strategy (JCS) and sites with planning permission, is substantial at 35,665 homes. There has been a track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current JCS. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area.

Although at this stage Glavenhill are not aware of any hard evidence that the commitment will not be delivered by 2036, but do believe that it should be treated with caution and it is therefore essential that an adequate buffer is added to the housing requirement figure in order to mitigate both under delivery of the commitment and of new allocations.

The Growth Options (options on pg.39-40)

9. Which alternative or alternatives do you favour?

Glavenhill broadly support Option 3 'Supporting the Cambridge to Norwich Hi-Tech Corridor' with some variations. These variations relate to the overall level of housing proposed, which we consider should be within the order of 11,000 new homes rather than the 7,200 set out within the Growth Options Document. The reasons for the additional requirement are set out in our answers to questions 4-6 above.

In order to accommodate the additional numbers, Growth Option 3 should be amended as follows:

- Provision of circa – 2000 units to a new settlement within the Plan Period (more to follow post 2036).
- Allocation of additional brownfield sites within Norwich City if available options can be identified.
- Allocation of additional (circa 1000 units) to the north-east on non-strategic sites (small to medium) to provide short term delivery in this area and to supplement larger growth triangle sites where delivery rates have been slow to date and to help provide City Deal housing requirement in association with employment growth around the airport.

- Any remaining requirement to be split proportionally between other locations identified under option 3.

The reasons for choosing Option 3, 'Supporting the Cambridge to Norwich Hi-Tech Corridor' (as amended) are as follows:

1. This option would ensure that the proposed housing growth is closely aligned with the ambitions of the New Anglia LEP Strategic Economic Plan which aims to deliver economic growth in identified Growth locations including Greater Norwich to build on the City Deal and within the A11 corridor. These locations are identified in the Strategic Economic Plan because they host high impact sector activity and are expected to grow over the plan period. There is a recognition within the plan that *"the northern part of the corridor has strong potential to develop its advanced manufacturing sector with a focus on Hethel Science and Technology Park and Snetterton."*

The Growth Options document recognises that *"The A11 corridor is a major focus of growth, with the route providing key strategic access to London, Cambridge and much of the rest of the UK. The Cambridge-Norwich Tech corridor initiative aims to boost economic development"*. The document sets an indicative target to provide around 45,000 jobs 2015 -2036 (para 4.12 of Growth Options Document) and proposes that the Greater Norwich Local Plan should aim to deliver forecast jobs growth plus additional growth which is consistent with evidence and the City Deal agreement with Government. Option 3 will provide the best support to enable the jobs potential of the Hi-Tech corridor to be realised in addition to jobs growth associated with the city centre, NRP and airport.

2. Option 3 provides the opportunity to focus significant growth in an area which could effectively create an extension of the Cambridge, Milton Keynes, Oxford corridor, which will be the subject of significant investment. In order to compete effectively with and benefit from the Cambridge regional growth, this option is essential.
3. Growth Options 1-3 have been scored the same within the Interim Sustainability Appraisal and perform significantly better in sustainability terms than options 4 -6. Options 4-6 should be discounted as least sustainable. The provision of adequate infrastructure and services to support new housing is extremely difficult under dispersal options and the increased level of public opposition to numerous dispersed sites that may not be properly served by infrastructure and services should not be under-estimated. This is not to say that there should be no dispersal. Where smaller sites in or on the edge of towns and villages can bring community benefit or help support the sustainability, viability and vitality of existing services and facilities, this should be supported. Glavenhill consider that option 3 provides the right level of dispersal without making this the focus of the growth strategy.
4. There are some similarities between Option 2 (Transport corridors) and Option 3 (supporting the Cambridge to Norwich Hi-Tech corridor) as both are focused upon

Transport routes. There are, however, significant advantages in choosing Option 3 over Option 2 as it would enable housing development and investment to be focussed in a core area that has the potential to generate significant employment in line with the Strategic Economic Plan objectives. This is a sustainable approach because it provides homes close to where the jobs will be created. This area also has the potential to benefit from funding sources through the LEP and Central Government to help deliver the Strategic Economic Plan objectives for the High-Tech corridor. Putting more development in other transport corridors as proposed under option 2 would disperse development further, would be unlikely to benefit from the same funding streams and has less potential for job creation and contribution to the local economy. There is also a danger that locating housing on key transport corridors will only add to existing commuting into Norwich, where the majority of employment opportunities are located. A new settlement within the Hi-Tech corridor under Option 3 can provide new homes close to new jobs and enable a planned approach towards infrastructure provision linking into various funding streams.

Option 1, (concentration close to Norwich) obviously scores well in sustainability terms but is very much a repeat of the existing Joint Core Strategy. There have been significant issues with delivery of the JCS numbers, particularly in certain areas and a repeat of this is not a desirable outcome. To accommodate the majority of the required housing numbers within an option 1 scenario would require significant additional pressure being placed upon Norwich Policy Area towns and villages, and the urban fringe, that are already experiencing high levels of growth under the JCS. As our evidence suggests that in the region of 11,000 new homes are required rather than the 7,200 specified in the Growth Options Document, there is a need to find sites for significantly more homes than currently presented under this option. Although there may be scope to find some more suitable brownfield sites within Norwich, it is not considered that there is sufficient capacity under this option to accommodate all of the growth requirement without having an adverse impact upon the character of fringe settlements, as well as increased pressure on infrastructure and services.

The additional benefit of Option 3 is that as well as directing significant growth to a corridor that can bring valuable benefits in terms of Hi -Tech job creation, the development of a new settlement based upon garden village principles will have less impact upon existing towns and villages than too many bolt on urban extensions that do not always provide the required level of infrastructure and facilities.

5. Glavenhill consider that the 11,000 homes required would be best accommodated by growth Option 3 that provides for a new settlement in the right location to help deliver on economic growth objectives as well as providing a sustainable level of additional growth to Norwich, its fringe settlements and other main towns and villages.
6. Glavenhill understand that there may be some nervousness regarding the ability to realise the delivery of a new settlement to garden village principles under this Growth Option

bearing in mind that this would be a new approach in this area. However, Glavenhill believe an ambitious strategy is necessary to ensure a prosperous future for the area, which also respects the key characteristics of Greater Norwich. Promotion of a new settlement offers a high level of local authority engagement in the development process to ensure that there is the correct framework in place for long term investment for required infrastructure and to ensure that the completed development is vested with the local community and there is sufficient long-term income flow to ensure long-term stewardship. Glavenhill believe that this is a deliverable model.

10. Do you know of any infrastructure constraints associated with any of the growth options?

With any significant housing and employment growth there will be supporting infrastructure requirements. It is essential that these are properly planned for at the outset.

The delivery of infrastructure for the dispersed growth options will be difficult. Glavenhill believe that the dispersal Options (4,5 and 6) provide significantly more constraints than the more concentrated growth Options (1-3).

Planning at scale by way of new settlements enables long term funding streams to provide infrastructure needed for the occupants and the wider area. This can be linked with existing employment centres.

However, the provision of small to medium growth within or adjacent to existing local service centres or villages can meet specific local needs, the details of which are demonstrated within the site specific sections of these representations.

11. Are there any other strategic growth options that should be considered?

12. Do you support the long-term development of a new settlement or settlements?

Green Belt

13. Do you support the establishment of a Green Belt? If you do, what are the relevant “exceptional circumstances”, which areas should be included, and which areas should be identified for growth up to and beyond 2036?

Glavenhill do not support the establishment of a Green Belt. This would only serve to push the required housing numbers further into the countryside in order to achieve a protected area around Norwich. This would be unsustainable because it would increase the length and number of journeys into the city and would be likely to have a greater environmental impact on countryside locations.

Norwich City Centre Defining the City Centre Area
14. Should the area defined as the city centre be extended?
Strategic City Centre Policy
15. Do you support the approach to strategic planning for the city centre in 4.80 above?
City Centre Offices
16. What should the plan do to reduce office losses and promote new office development in the city centre?
Retailing
17. What should the plan do to promote retailing in the city centre?
Leisure and Late Night Activity Zone
18. Should the focus for late night activities remain at Riverside, Prince of Wales Road, and Tombland, or should a more flexible approach be taken?
City Centre Housing
19. What should the plan do to promote housing development in the city centre?
Cultural, Visitor and Education Facilities
20. How can the plan best support cultural, visitor and educational uses in the city centre?
Remainder of the Norwich Urban Area and the Fringe Parishes
21. Do you support Option UA1 for the remainder of the urban area and the fringe parishes?
Main Towns
22. Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?
Settlement Hierarchy
23. Do you agree with the approach to the top three tiers of the hierarchy?
Glavenhill support this approach.

24. Do you favour option SH1, and are the villages shown in appendix 3 correctly placed?

Glavenhill favours option SH1 which promotes the continuation of the current approach i.e for the level of growth that is to be apportioned to different settlements to respond to their scale and their number and range of services.

Glavenhill is supportive of the recognition given to the roles played by Key Service Centres and Services Villages in the settlement hierarchy within paragraphs 4.113 and 4.114 of the Growth Options Document.

Glavenhill agree that growth should be apportioned to these settlements in accordance with their position within the settlement hierarchy and with the aim of promoting sustainable forms of development.

Glavenhill are cognisant of the fact that in some rural areas, villages may share services and that only through doing so, may be considered sustainable places for growth.

However, Glavenhill consider it inappropriate based upon the evidence available at this time to 'group' the settlements in tiers 4 to 6 of the hierarchy into a single tier to reflect this inter-relationship.

25. Do you favour the Village Cluster approach in option SH2?

Glavenhill do not support the village cluster approach set out in option SH2 of the Growth Options Document.

Grouping Service villages with other villages and smaller rural communities could, in Glavenhill's view and based upon the evidence available at this time, result in the differences between settlements i.e. their respective suitability to accommodate additional growth, to be 'masked'. It is possible that the cluster approach may, contrary to its assumed intention, lead to uncertainty over the level of growth to be experienced in rural areas, making it difficult to plan for infrastructure and service provision.

Glavenhill recommend for the reasons stated above and based upon the evidence currently available, that the existing 6 tier hierarchy be retained (as per Option SH1 of the Growth Options Document).

25a. What criteria should be used to define clusters?

See Glavenhill's response to question 25 above

25b. Which specific villages could form clusters?

See Glavenhill's response to question 25 above
25c. How could growth be allocated between villages within a cluster?
See Glavenhill's response to question 25 above
The Influence of the Norwich Urban Area
26. Do you support a Norwich centred policy area and, if so, why and on what boundaries?
Section 6 – Topic Policies
The Economy
The Supply of Employment Land
27. What option or options do you support? (refers to options on pg.71-2)
28. Which allocated or existing employment sites should be identified as strategic sites and protected?
29. Are there employment areas that should be identified as suitable for release for residential uses?
30. Are there any new employment sites that should be allocated?
Accommodating Expenditure Growth
31. Should the position of any of the centres in the retail hierarchy be changed?
32. Do any of the existing retail centres have scope to expand to accommodate further floorspace?
The Rural Economy
33. What measures could the GNLP introduce to boost the rural economy?
Access and Transportation
Strategic Transport Issues
34. Are there any other specific strategic transport improvements the GNLP should support?

Promoting Healthier Lifestyles, Sustainable Travel Choices and Greater Accessibility to Broadband

35. Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area?

Design Options

36. What approach do you support for promoting good design of new development?

Glavenhill consider that Option DE1 to broadly continue with the existing design and density policy approaches with some relatively minor changes and updating is appropriate at this time. There remains a need to promote good design in accordance with existing and emerging National policy.

Setting more prescriptive design and density policies should be approached with caution. A flexibly policy is appropriate. Individual site allocation policies may set more prescriptive site specific requirements, based upon a robust assessment of site specific characteristics and potential environmental sensitivities, where relevant.

Housing

Minimum Affordable Housing Threshold

37. Which approach to affordable housing thresholds do you prefer?

Glavenhill favour option AH2 which requires affordable housing on sites of 11 or more dwellings in line with current and expected Government guidance. Glavenhill object to option AH1 for the same reason.

Application of Affordable Housing Percentage Requirements on Sites

38. What approach do you favour for affordable housing percentages? (refers to options on pg.87)

Glavenhill favour a hybrid approach (an amalgamation of AH3 and AH5) that allows for a viability assessment of larger sites to arrive at a deliverable affordable housing figure and a fixed percentage in smaller traditional housing sites (where overall viability will be easier to predict) delivering more than 11 dwellings. This will maximise housing delivery whilst also encouraging the developers of larger sites where infrastructure, finance and phasing costs are higher to deliver.

The obvious problem in the calculations used is that the 2017 SHMA conclusion figure is far too low as it makes no provision for the rolled-up backlog (due the annual failure by the GNGB Councils to hit housing targets) over the JCS Plan period pre-2015; or the City Deal housing numbers that remain an unmet housing commitment agreed with Central Government and now seem to have been lost in the current calculations.

Tenure Split for Affordable Housing

39. Do you support the favoured option for tenure split?

Glavenhill object to the current one-size-fits-all approach to housing tenure types and split as advocated under option AH6. This approach may work with a standard volume housebuilder and/or local developer model however, a degree of flexibility is required to attract housebuilders and ensure delivery.

Rural Windfall, Exception Sites and Small Sites

40. Which approach do you think should be taken to rural windfall and exceptions sites? (refers to options on pg.89-90)

Glavenhill consider that Option AH7 to allow small scale windfall sites adjacent to settlements with development boundaries is appropriate. These sites should be subject to a criteria-based policy to ensure that they are only permitted where they are acceptable in terms of impact on form and character, landscape setting of the village and are immediately adjacent to settlement boundaries.

Housing Mix – Relative Ratios of House Sizes by Bedrooms

41. Which approach to the mix of housing do you support? (refers to options on pg.92)

Glavenhill support option AH10 and object to option AH9 as described on the basis that the market will always dictate housing mix delivery based on a known existing demand within each District. Any attempt to apply a blanket housing mix across the entire Greater Norwich area will only serve to frustrate housing delivery and repeat the mistakes of the past that have resulted in missed housing targets and a rolled-up housing need.

Housing with Care, Extra-Care Housing and Retirement Housing

42. Which approach or approaches to housing for older people and care accommodation do you favour?

Houseboats

43. Which of the reasonable alternatives for houseboats do you favour?

Gypsies and Travellers
44. Which policy approach do you favour to planning for the needs of Gypsies and Travellers?
45. Are there any suitable sites for Gypsy and Traveller accommodation you wish to submit?
Travelling Showpeople
46. Do you support the favoured option for planning for the needs of Travelling Showpeople?
47. Are there any suitable sites for Travelling Showpeople accommodation you wish to submit?
Residential Caravans/Park Homes
48. Do you support the favoured option for residential caravans and park homes?
49. Are there any potential locations for new/expanded residential caravan sites that you wish to propose?
<i>Climate Change</i>
50. Do you support the favoured option for climate change policy?
<i>Air Quality</i>
How Should Air Quality be Covered in the GNLP?
51. Which approach do you favour for air quality? (refers to options on pg.104-5)
<i>Flooding</i>
How Should Flooding and Flood Risk be Covered in the GNLP?
52. Do you support the favoured option for flood risk policy?
<i>Nature Conservation, Green Infrastructure and Habitats Regulation Assessment Mitigation</i>
How Should Nature Conservation and Green Infrastructure be Covered in the GNLP?
53. Which option do you support? (refers to options on pg.111)

Glavenhill supports a variation of option NC1 where specific housing, employment and new garden settlement sites are chosen to deliver large areas of strategic green infrastructure.

54. Do you think any changes should be made to the Green Infrastructure network?

Landscape

Landscape Character and Protection

55. Which of these options do you favour? (refers to options on pg.115)

Strategic Gaps

56. Should the GNLP protect additional Strategic Gaps and if so where should these be?

Energy

57. Should option EN1 be included in the GNLP?

Water

58. Do you support option W1?

Communities

Location of Affordable Housing within Sites

59. Do you support option COM1 for the distribution of affordable housing?

Health Impact Assessments

60. Which option do you support? (refers to options on pg.123)

Neighbourhood Planning

61. Do you support option NP1? If so, which GNLP policies should be “strategic”?

Culture

How Should Culture be Covered in the GNLP?

62. Which option do you support? (refers to options on pg.126-7)

The Broads

63. Do you support option BR1?

Section 7 – Monitoring the Plan

Monitoring of the GNLP

64. Are there any current indicators that should be excluded or included in the GNLP monitoring framework?

Shortfall in Housing Land Supply

65. Which option do you support? (refers to options on pg.131-2)

Glavenhill note the policy Option HLS1 to allow the most appropriate HELAA sites to come forward if there were no 5-year land supply. Glavenhill are concerned that this approach will be difficult to put into practice. If this approach is taken it will presumably be based upon the development hierarchy but how will locations be prioritised between South Norfolk and Broadland in particular? The level of assessment of HELAA sites is minimal and the onus is on the Councils to undertake this rather than the landowner/developer. It will be difficult to prioritise sites based on limited assessment information, in locations where there are multiple sites available. How will this process be undertaken in a fair and transparent way outside of the Local Plan process? It is therefore questionable whether this approach would actually provide a simpler and quicker process than Option HLS2.

Glavenhill consider that Option HLS2 requiring a short, focussed review of the local plan to allocate more deliverable sites is the only reasonable approach because it is fair and transparent. This also places the onus upon the promoter to provide evidence regarding site suitability and delivery. The need for such a review should be kept under continuous review based upon annual monitoring reports. This was the approach recommended by the Inspector in relation to housing shortfall in the Broadland part of the NPA for the JCS and JCS policy 22 was put in place for this purpose, although it is noted this has not been implemented.

Continuing to allow planning permissions on a 5-year land supply basis until the short focussed review has been completed is a reasonable approach and if an appropriate buffer is added to the housing requirement figure during plan preparation (see our response to question 5), then the likelihood of there being insufficient 5 year housing land supply should be minimal in any case.

General Questions

66. Are there any other issues relating to the GNLP you would like to raise?

6. Site Suitability Assessment

The Housing and Economic Land Availability Assessment (HELAA) December 2017 which accompanies the publication of the GNLP, has assessed the suitability and availability of those sites submitted through the Call for Sites exercise for residential development. The assessment comprises a desk-top assessment and advice from a range of technical consultees. It identifies potential constraints to development and/or impacts of development which may need further investigation for each of the sites submitted.

As outlined in earlier sections of these representations, a number of technical assessments have been undertaken across the proposed allocation site covering a range of issues and these are summarised in Section 4 above. These assessments have enabled Glavenhill to draw more detailed conclusions on the suitability of this site as set out below.

The HELAA assesses the site as two separate land parcels, albeit presents the same conclusions for each land parcel against the various constraint and impact criteria. A comparison of the HELAA conclusions for sites GNLP0495 and GNLP0477 against the the site specific technical assessments for the proposed allocation (when taken as a whole) is presented as follows:

Constraints Analysis	GNLP Assessment	Lanpro's Assessment (on behalf of Glavenhill)
Access	Amber	Green
Accessibility to Services	Amber	Green
Utilities Capacity	Amber	Green
Utilities Infrastructure	Green	Green
Contamination and Ground Stability	Green	Green
Flood Risk	Green	Green
Market Attractiveness	Green	Green
Impacts Analysis		
Significant Landscapes	Green	Green
Townscapes	Amber	Green
Biodiversity and Geo-diversity	Green	Green
Historic Environment	Green	Green
Open space and GI	Green	Green
Transport and Roads	Amber	Green
Compatibility with Neighbouring uses.	Green	Green

Access, Transport and Roads

Questions are raised within the HELAA over the ability to create a suitable access into the proposed allocation site. The Transport Assessment and access details submitted in support of the outline planning application demonstrate the ability to achieve a safe point of access into the site from School Lane (see **Figure 2** and **Appendix 1**) that is capable in capacity and visibility terms to accommodate in the order of 30 dwellings. The County Highway Authority has raised no objection to the proposed access arrangements in response to the application proposals. There are additional opportunities to deliver highway improvement measures within the village as part of any application proposal, the sufficiency of which has been agreed by the Highway Authority through the outline application process.

Glavenhill contend that the proposed allocation site is entirely appropriate for residential development based upon the ability to provide a safe point of access into the site from School Lane and for the existing road network to accommodate the additional traffic movements from the development without the need for significant adaptation.

Accessibility to Services

The site is located on the edge of the Service Village of Little Melton, which is through its location within the settlement hierarchy is considered capable of accommodating additional residential growth. Despite this, the HELAA raises questions over the accessibility of the site.

The planning application documentation has demonstrated the site to be sustainably located within easy walking distance of a range of local services within the village. These services will benefit from the additional population and footfall to be brought about by the site's development, adding to the vitality and viability of the area.

In this and all other respects, the site's accessibility and contribution towards the improvement of local services both within the village and within easy travel distance of it, is considered good.

Glavenhill contend that the site is entirely appropriate for development based upon its accessibility to services.

Utilities

Concern is raised within the HELAA over utility capacity. The Utility Assessment submitted in support of the outline application, demonstrates sufficient capacity at the local water treatment works to accommodate the proposed development of the proposed allocation site.

Anglian Water has been consulted on the application proposals and confirm no objection on the basis of the available capacity.

The proposed allocation site is capable of being served by power and communication networks through the extension of existing provision.

Glavenhill contend that the proposed allocation site is entirely appropriate for allocation for residential development based upon utility capacity.

Contamination and Flood Risk

A Phase 1 Ground Conditions Assessment has been carried out for the proposed allocation site and is submitted in support of the outline planning application. The Assessment confirms that the risk of ground contamination is low. The Council's Environmental Health Officer does not dispute this conclusion, providing no objection to the outline planning application.

The HELAA confirms that the proposed allocation site is suitable for residential development in flood risk terms and the Flood Risk Assessment (FRA) submitted in support of the outline planning permission confirms that the site falls within Flood Zone 1 and is at limited risk of flooding. The FRA has shown that it is possible for surface water to infiltrate and a sustainable urban drainage strategy has been outlined.

Glavenhill agree with the findings of the HELAA in that that site is entirely appropriate for allocation for residential development based upon its low flood risk and ground contamination potential.

Market Attractiveness

The site is under single ownership and is being promoted by Glavenhill through the planning application process as a deliverable residential development opportunity available within the early stages of the Plan Period.

Glavenhill agree with the findings of the HELAA in that the site is appropriate for allocation for residential development based upon its availability and deliverability.

Landscape and Townscape

The HELAA describes the proposed allocation site as being well related to nearby housing. The site's ability to provide a logical and defensible extension to the existing settlement has been corroborated by South Norfolk's Design and Conservation Officer in his response to the outline planning application. The GNGB's conclusion that development will have an acceptable impact

upon the proposed allocation site's landscape and townscape characteristics, is accepted by Glavenhill.

The provision of accessible greenspace, new strategic landscaping and new habitats, improves upon the amenity of the proposed allocation site and provides recreation space to the benefit of the population's (existing and proposed) health and wellbeing.

However, questions are raised within the HELAA over the townscape impacts of the proposed development, assigning it 'Amber' within the colour coded impact analysis. The illustrative masterplan that is submitted in support of the outline planning application and enclosed with these representations demonstrates one way in which residential dwellings may be provided within the proposed allocation site alongside considerable new areas of landscaping such to mitigate any potential impact upon the local townscape character. In response the Council's Design and Conservation Officer has confirmed that the layout and grain relates to the existing neighbourhood character which is relatively suburban in character and that *"the less 'regimented' feel to the development is therefore welcomed."*

In this and all other respects Glavenhill contend that the proposed allocation site is entirely appropriate for allocation for residential development based upon its ability to deliver a well planned extension to the existing settlement with limited material landscape and townscape impacts.

Biodiversity

A series of ecological assessments have been undertaken at the proposed allocation site and have been submitted in support of the outline planning application.

The proposed allocation site comprises two connected grassland fields with vegetated boundaries including scrub cover, hedgerows and broad-leaved and coniferous trees. Collectively the habitats within the proposed allocation site are assessed as being of lower value at up to the Parish level.

Based on the habitat types present, it is considered that the proposed allocation site has potential to support amphibians (including great crested newt), reptiles, breeding birds and bats.

In the absence of mitigation, the proposed development would give rise to a loss of improved grassland in the internal areas of the site as well as some minor loss of boundary hedgerow for site access.

A draft mitigation strategy is provided on the illustrative masterplan which landscape buffers and providing native planting that is appropriate to encourage occupation of the site by protected species including Great Crested Newts.

The status of Great Crested Newts at the proposed allocation site remains uncertain. To mitigate the potential for a small population of Newts within ponds close to the site, the illustrative masterplan includes for two development offset areas (the north and south of the southern land parcel).

Further proposed ecological enhancements may include, but are not limited to, bat boxes, bird boxes, permanent wildflower grassland and shrub habitats, and ornamental planting of value to wildlife.

With these measures provided, the residential development of the proposed allocation site may deliver a Neutral-Minor Beneficial impact on ecology.

Glavenhill agree with the findings of the HELAA in that the proposed allocation site is appropriate for allocation for residential development based upon its biodiversity.

Historic Environment

The proposed allocation site is located close to a Grade II Listed barn at Elm Farm and the impact of the proposed development upon the setting of the barn is assessed within the Heritage Statement submitted in support of the outline planning application.

The Statement concludes that the proposed development will not harm the main elements of the barn that contribute to its significance although they will remove a part of the barn's wider agricultural setting and historic links with this piece of land.

These aspects are, however, only considered to make a very slight contribution to the significance of the barn and the proposed development has been designed to minimise any visual impact upon the barn.

Therefore, any harm to the significance of the heritage asset will fall well below the 'less than substantial' threshold.

Lanpro has undertaken an archaeological desk-based assessment which is submitted in support of the outline planning application

The available archaeological records, combined with analysis of historical mapping, as well as the results of the archaeological geophysical survey undertaken across the site as part of this

assessment, suggest that there is potential for the proposed allocation site to contain archaeological remains of a late prehistoric, Roman or early medieval date. Based on the available evidence, it is considered that any such remains would be of no more than local significance.

Subsequent trial trenching has confirmed that the archaeological resource is not of such significance to warrant retention in situ and to affect the proposed allocation site's suitability for development.

Glavenhill agree with the findings of the HELAA in that the proposed allocation site is appropriate for allocation for residential development based upon its heritage value and that of nearby structures.

Compatibility with Neighbouring Uses

The proposed development proposed a logical and defensible extension to the village of Little Melton. Glavenhill agree with the findings of the HELAA in that the proposed allocation site is appropriate for allocation for residential development based upon its compatibility with Neighbouring Uses.

Conclusion

Taking account of the updated assessment work undertaken at the proposed allocation site on behalf of land promoters, Glavenhill conclude that the site is entirely **SUITABLE** for residential development when considered against all constraint and impact categories outlined above.

There are no overriding constraints to development that prevent its allocation and delivery.

7. Conclusions

The sites have been combined and refined in their extent since the initial call for sites exercise and the resulting proposed allocation site is currently the subject of an outline planning application.

The proposed allocation site has been demonstrated through the planning application process to be sustainably located on the edge of the Service Village of Little Melton and within the Norwich Policy Area. The site is an appropriate and sustainable place to accommodate new housing development.

Contrary to the conclusions of the HELAA, the proposed allocation site has been demonstrated through the planning application process to be safely accessed via School Lane and not to have a severe impact upon the local transport network. The proposed allocation site is accessible to and will support, through its development, local services. There is sufficient capacity within the local utility network to accommodate new dwellings on the site. The site will form a logical extension to the settlement limit.

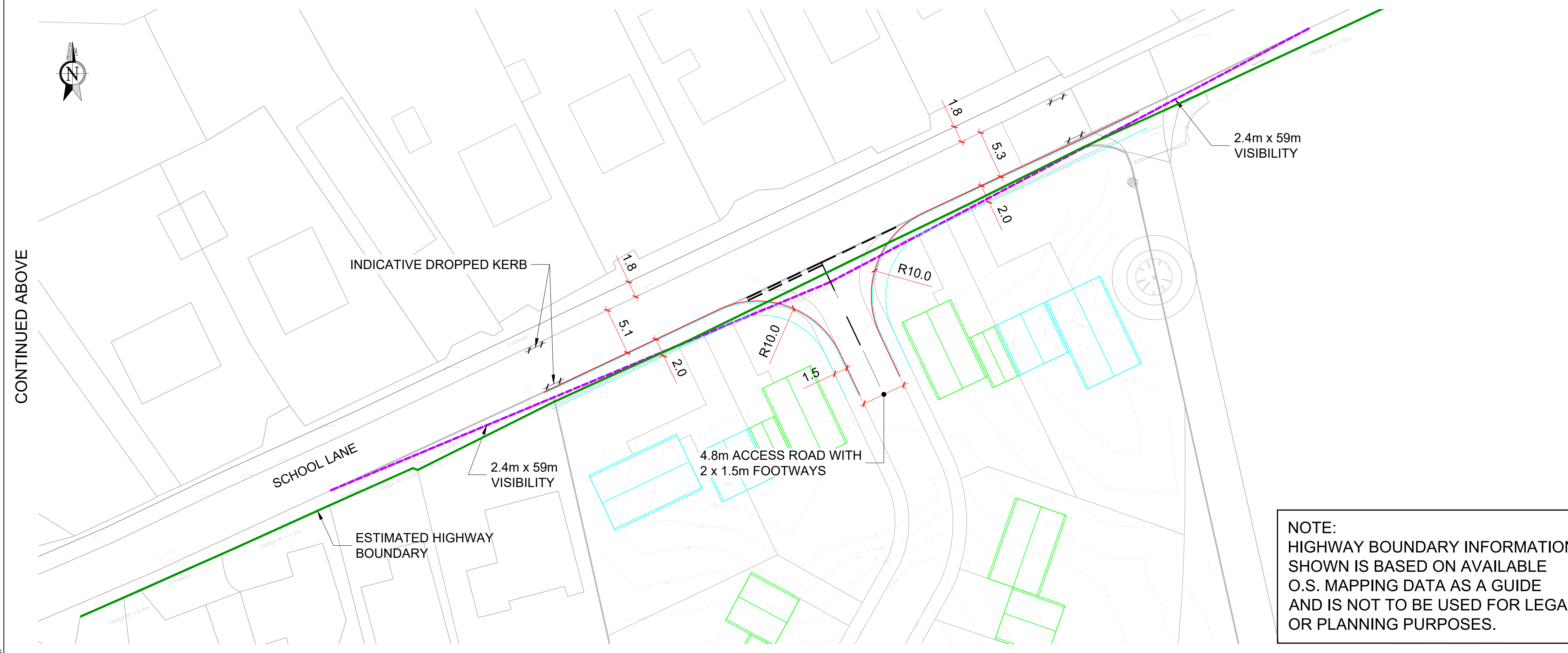
By way of summary, there are no overriding constraints that would prevent the proposed allocation site from being developed for housing within the early stages of the plan period and Glavenhill respectfully request it be allocated within the emerging Local Plan.

8. Next Steps

Lanpro would welcome the opportunity to discuss the proposed allocation site with the GNGB and to answer any questions that the Board may have on the sites suitability and deliverability on behalf of the land promotor, Glavenhill.



Appendix 1 – Proposed Site Access Plan



SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION BOX
NOTES: THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE RISK REGISTER PRODUCED FOR INCLUSION IN THE HEALTH AND SAFETY PLAN. THE HAZARDS NOTED ARE IN ADDITION TO THE NORMAL HAZARDS AND RISKS FACED BY A COMPETENT CONTRACTOR WHEN DEALING WITH THE TYPE OF WORKS DETAILED ON THIS DRAWING.

CONSTRUCTION RISKS

- NO SIGNIFICANT RISKS

MAINTENANCE/CLEANING RISKS

- NO SIGNIFICANT RISKS

DEMOLITION RISKS

- NO SIGNIFICANT RISKS

NOTE:

- DO NOT SCALE, IF IN DOUBT ASK.
- THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT STRUCTURAL ENGINEER'S DRAWINGS AND DETAILS. THE SPECIFICATION FOR THE WORKS, THE RELEVANT ARCHITECT'S DRAWINGS AND ANY OTHER SPECIALIST'S DRAWINGS.
- ANY DISCREPANCIES FOUND ON THIS OR ANY OTHER DRAWINGS ARE TO BE REPORTED TO AND RESOLVED BY ROSSI LONG CONSULTING BEFORE THE COMMENCEMENT OF ANY WORK RELEVANT TO THE DISCREPANCY.
- THE PRINCIPAL CONTRACTOR IS TO PROVIDE FULLY DESIGNED PROPPING/SHORING TO FACILITATE THE WORKS, ALL PROPPING & BRACING IS TO BE ADJUSTED TO BE SUITABLE TO MAINTAIN THE INTEGRITY OF THE EXISTING/PROPOSED STRUCTURES &/OR EARTHWORKS IS MAINTAINED, UNLESS INDICATED ON THE DRAWINGS. THE TEMPORARY OF WORKS ARE TO BE ADJUSTED TO BE SUITABLE TO MAINTAIN THE STRUCTURE WITHOUT PRIOR WRITTEN CONSENT FROM ROSSI LONG CONSULTING.
- THIS DOCUMENT HAS BEEN PREPARED IN ACCORDANCE WITH THE SCOPE OF ROSSI LONG CONSULTING'S APPOINTMENT WITH THE CLIENT AND IS SUBJECT TO THE TERMS OF THAT APPOINTMENT. ROSSI LONG CONSULTING ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN BY THE CLIENT AND ONLY FOR THE PURPOSES FOR WHICH IT WAS PREPARED AND PROVIDED. ONLY WRITTEN DIMENSIONS SHALL BE USED.

© ROSSI LONG CONSULTING 2017

PRELIMINARY DRAWING:

**THIS DRAWING IS FOR PRELIMINARY PURPOSES ONLY
AND MUST NOT BE READ AS A CONSTRUCTION ISSUE.
IT INDICATES DESIGN INTENT ONLY AND IS SUBJECT TO
AMENDMENT DURING FINAL DESIGN DEVELOPMENT.**

P9	O.S. BACKGROUND DATA ADDED.	09.02.18	GM	LF
P7	GREEN LINE BOUNDARY REMOVED.	08.12.17	GM	LF
P8	DRAWING TITLES AMENDED.	04.12.17	GM	LF
P6	JUNCTION LOCATION MOVED TO MATCH ARCHITECTS LAYOUT.	01.12.17	GMA	LF
P5	CARRIAGEWAYS AND FOOTPATH WIDTH DIMENSIONS ADDED.	27.11.17	GM	LF
P4	HIGHWAY BOUNDARY LINE ADDED.	17.11.17	GM	LF
P3	HIGHWAY FOOTPATHS WIDENED TO 2m.	10.11.17	GM	LF
P2	ADDITIONAL DROPPED KERBS.	21.08.17	JE	LF
P1	PRELIMINARY ISSUE.	18.08.17	GMA	LF

REV	DESCRIPTION	DATE	BY	AUTH
-----	-------------	------	----	------



Rossi Long Consulting

Meridian Way, Norwich, Norfolk, NR7 0TA
01603 706 420 F: 01603 706 421 www.rossilong.co.uk

IENT

GLAVENHILL STRATEGIC LAND
(No.8) LTD.

PROJECT

LAND TO THE SOUTH
OF SCHOOL LANE,
LITTLE MELTON

PROPOSED ACCESS DESIGN

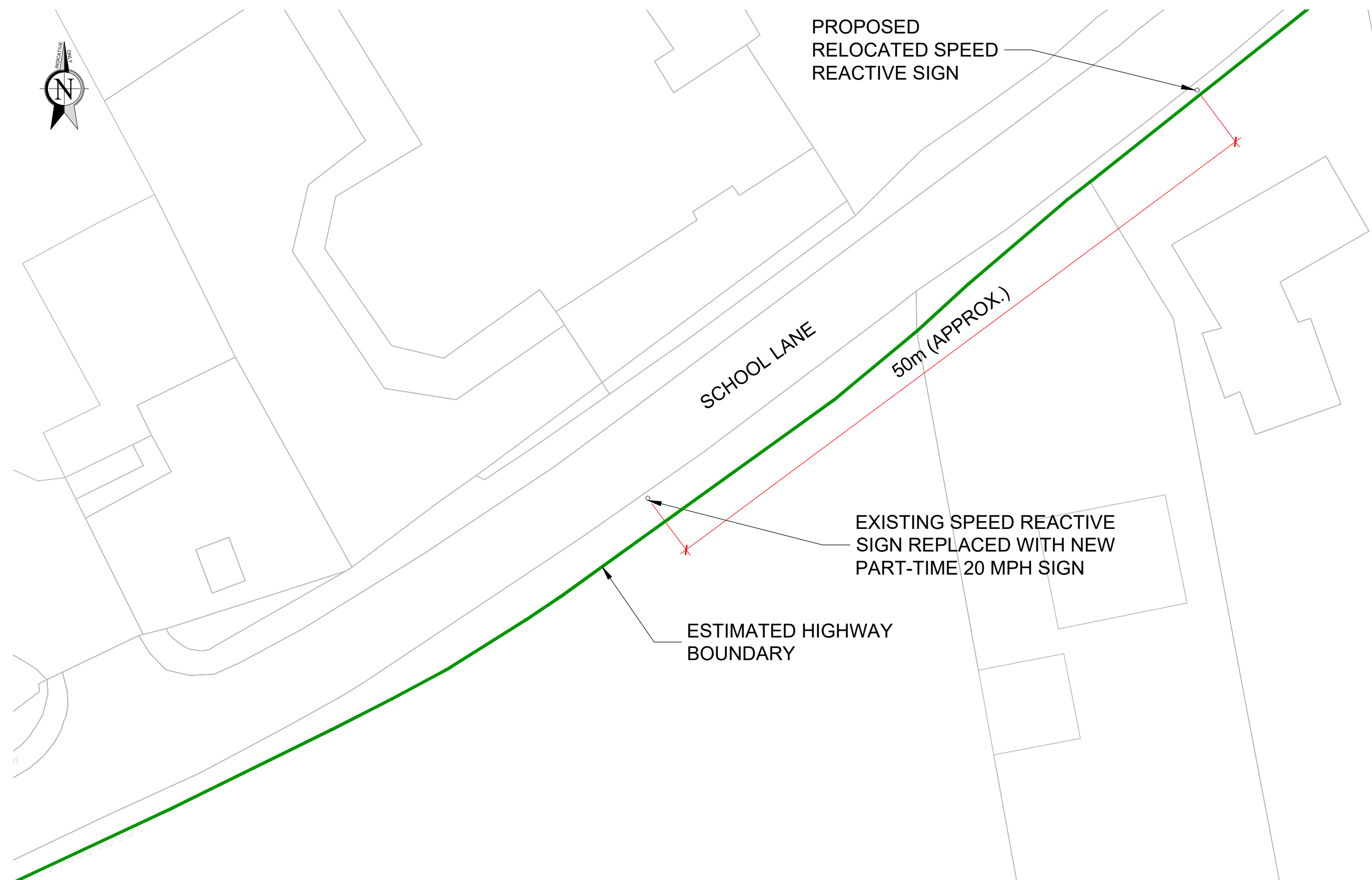
SHEET 1

RAWN GMA	AUTHORISED LF	DATE 18.08.17	SCALE AT A1 1:250
PROJECT NO. 71352		DRAWING NO. SK-100	REV P9

PAGE

PRELIMINARY

CONTINUED ABOVE

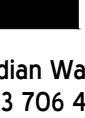


NOTE:
HIGHWAY BOUNDARY INFORMATION
SHOWN IS BASED ON AVAILABLE
N.C.C. MAPPING DATA AS A GUIDE
AND IS NOT TO BE USED FOR LEGAL
OR PLANNING PURPOSES.

SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION BOX: NOTES: THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE RISK REGISTER PROVIDED FOR INCLUSION IN THE HEALTH AND SAFETY PLAN. THE HAZARDS NOTED ARE IN ADDITION TO THE NORMAL HAZARDS AND RISKS FACED BY A COMPETENT CONTRACTOR WHEN DEALING WITH THE TYPE OF WORKS DETAILED ON THIS DRAWING.
CONSTRUCTION RISKS: • NO SIGNIFICANT RISKS.
MAINTENANCE/CLEANING RISKS: • NO SIGNIFICANT RISKS.
DEMOLITION RISKS: • NO SIGNIFICANT RISKS.
NOTE: 1. DO NOT SCALE, IF IN DOUBT ASK. 2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT STRUCTURAL ENGINEER'S DRAWINGS AND DETAILS, THE SPECIFICATION FOR THE WORKS, THE RELEVANT ARCHITECT'S DRAWINGS AND ANY OTHER SPECIALIST'S DRAWINGS. 3. ANY DISCREPANCIES FOUND ON THIS OR ANY OTHER DRAWINGS ARE TO BE REPORTED TO AND RESOLVED BY ROSSI LONG CONSULTING BEFORE THE COMMENCEMENT OF ANY WORK RELEVANT TO THE DISCREPANCY. 4. THE PRINCIPAL CONTRACTOR IS TO PROVIDE FULLY DESIGNED PROPPING/SKORING TO FACILITATE THE WORKS. ALL PROPPING & BRACING IS TO BE ADEQUATELY FOUNDED TO ENSURE THE STABILITY/INTEGRITY OF THE EXISTING/PROPOSED STRUCTURES &/OR EARTHWORKS IS MAINTAINED. UNLESS INDICATED ON THE DRAWINGS, THE TEMPORARY WORKS ARE NOT TO IMPOSE REACTIONS ON THE PERMANENT STRUCTURE WITHOUT PRIOR WRITTEN CONSENT FROM ROSSI LONG CONSULTING. 5. THIS DOCUMENT HAS BEEN PREPARED IN ACCORDANCE WITH THE SCOPE OF ROSSI LONG CONSULTING'S APPOINTMENT WITH ITS CLIENT AND IS SUBJECT TO THE TERMS OF THAT APPOINTMENT. ROSSI LONG CONSULTING ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN BY ITS CLIENT AND ONLY FOR THE PURPOSES FOR WHICH IT WAS PREPARED AND PROVIDED. ONLY WRITTEN DIMENSIONS SHALL BE USED.
© ROSSI LONG CONSULTING 2017.

PRELIMINARY DRAWING:
THIS DRAWING IS FOR PRELIMINARY PURPOSES ONLY
AND MUST NOT BE READ AS A CONSTRUCTION ISSUE.
IT INDICATES DESIGN INTENT ONLY AND IS SUBJECT TO
AMENDMENT DURING FINAL DESIGN DEVELOPMENT.

P2	O.S. BACKGROUND DATA ADDED.	09.02.18	GM	LF
P1	PRELIMINARY ISSUE.	07.02.18	GM	LF
REV	DESCRIPTION	DATE	BY	AUTH

 Rossi Long Consulting			
16 Meridian Way, Norwich, Norfolk, NR7 0TA T: 01603 706 420 F: 01603 706 421 www.rossilong.co.uk			
CLIENT			
GLAVENHILL STRATEGIC LAND (No.8) LTD.			
PROJECT			
LAND TO THE SOUTH OF SCHOOL LANE, LITTLE MELTON			
TITLE			
PROPOSED ACCESS DESIGN SHEET 2			
DRAWN GM	AUTHORISED LF	DATE 07.02.18	SCALE AT A1 1:250
PROJECT NO. 171352		DRAWING NO. SK-101	REV P2
STAGE:-			
PRELIMINARY			