

## **GNLP Regulation 18 Consultation Response**

### **GNLP0520 – Land South of Norwich Road, Hingham**

On behalf of Abel Homes, we strongly recommend that Land South of Norwich Road, Hingham (GNLP0520) should be allocated for residential development. The site is considered to be entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2036.

In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', set out in footnote 11 to paragraph 47, the site 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.

The suitability of the site has already been assessed in the Housing and Economic Land Availability Assessment (HELAA) (2017). Whilst the assessment determined the site to be 'suitable', it raised a variety of site-specific constraints. These points are addressed in further detail below.

#### **Assessment of Deliverability**

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

Hingham is identified in the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) (2011) as a Key Service Centre. Key Service Centres are identified as locations that due to the range of amenities they provide, as well as the employment and transport links to Norwich and the Main Towns, are capable of accommodating small to moderate levels of new housing.

The Greater Norwich Local Plan Regulation 18 Consultation document states that in identifying sites to accommodate the additional 7,200 homes required during the period up to 2036, consideration will be given to a range of settlements, including Key Service Centres (of which Hingham is one), which will need to accommodate a minimum level of growth of 1,000 units, irrespective of which of the six growth options is identified. On this basis, Hingham is considered to be a location that is, in principle, a suitable location for additional development.

The site lies to the east of Hingham, and is situated outside of the existing Settlement Boundary. However, the site lies immediately adjacent to The Hops, a new development of 88 dwellings by Abel Homes, on land allocated under Policy HIN 1 of the adopted South Norfolk Local Plan, Site Specific Allocations and Policies Document (2015). The site would provide a logical extension to the Settlement Boundary, immediately adjacent to a site that has been considered suitable for development, and, as detailed on the attached 'Concept Masterplan Village Context', has the potential to create a clear and defensible boundary to the village of Hingham. The development would be immediately to the south of an existing employment area, and would provide a natural 'rounding off' of the village.

The attached illustrative plans prepared by Feilden & Mawson demonstrate that, if developed in its entirety, the site, which extends to 12.7ha could, based on a density of 19.7 dwellings per hectare, could be developed to provide approximately 250 units. To ensure it provides an accurate indication as to what can be provided on the site, the indicative development plan has been prepared having regard to key planning

policy requirements, notably parking and open space provision. However, the scale of development accommodated on the site will ultimately depend on the quantum of growth allocated to Hingham. On this basis, the plans prepared by Feilden & Mawson demonstrate how the site could be developed in three phases to accommodate a range of growth options from approximately 39 to 250 dwellings. *(It should be noted that in order to ensure a robust submission, the technical information prepared to support these representations assumes the maximum quantum of development on the site.)* In spite of this, the client has adopted a flexible approach to bringing forward development on the site, and is willing to take both direction and advice from the GNLP; in regards to the phasing and the quantum of development which could be provided on the site. Thus, development on the site could be constituted of a variety of phases, to meet the future housing needs of Hingham.

In terms of more detailed site-specific considerations, the HELAA identifies the site as a suitable location for residential development. It confirms through a 'Green' rating, that there are no constraints or impacts anticipated in relation to Accessibility to Services; Utilities Infrastructure; Contamination and Ground Stability; Flood Risk; Market Attractiveness; Significant Landscapes; Open Space and Green Infrastructure. Whereas, the following site-specific constraints are rated 'Amber': Access; Utilities Infrastructure; Townscapes; Biodiversity and Geodiversity; Historic Environment; Transport and Roads; and Compatibility with Neighbouring Uses. These are addressed below.

#### *Access, Transport and Roads*

Vehicular access to the site would be achieved through a combination of an extension to the access road which serves The Hops, and a new junction from Norwich Road. In terms of the former, it is considered that this access road could serve approximately 125 units in total, if agreed with Norfolk County Highways. Through the creation of a second access point, and a 'loop' created through connecting with The Hops, the access could serve up to 700 dwellings, in accordance with the Norfolk Residential Design Guide.

A Highways Report produced by Richard Jackson Engineering Consultants and submitted in support of this Representation demonstrates that sufficient access to the site could be created via Norwich Road, which would provide for adequate visibility in accordance with the 30mph speed limit, whilst avoiding the existing mature trees.

The Highways Report also details how improved pedestrian and cyclist connections via The Hops could be implemented to provide sufficient access into the centre of Hingham; which would provide access to the local services available in Hingham, particularly the school. By providing pedestrian and cycle access through The Hops and not on the Norwich Road frontage, the Tree Preservation Order which covers the mature trees on the Norwich Road will not be impacted upon. The Highways Report summarises that: Site Access; Local Junction Assessment; Accessibility to Services; Pedestrian Links; Cycle Facilities and Public Transport are all rated 'satisfactory'. In terms of public transport, Konectbus provide frequent services, which offer a good service for both commuting and social facilities.

The location of the site to the east of Hingham is also beneficial in highway terms. Hingham is connected to Norwich via the B1108, which enters Hingham from the east. The B1108 serves both Norwich, and a variety of surrounding areas. Therefore, the location of the site would enable those commuting to and from Norwich, and other locations, to not have to pass through the centre of the village.

At present, a Public Right of Way passes through the site, along the eastern boundary of The Hops. The Public Right of Way would be retained, in its entirety, and would be incorporated into a landscape buffer, as demonstrated on the plans produced in support of this Representation by Feilden & Mawson.

The foregoing text demonstrates that there are no constraints to development in terms of access, transport and roads.

### *Utilities Capacity*

To justify residential development on the site, it is necessary to demonstrate that sufficient utilities can be provided. A Utilities Report provided by Richard Jackson Engineering Consultants concludes that Cadent Gas Ltd, UK Power Networks and BT could all provide apparatus into the site. UKPN would potentially require an onsite substation, whilst connection to Anglian Water foul water sewers and the disposal of surface water through infiltration techniques appear, based on the research undertaken, to be feasible. The report demonstrates that there are existing services adjacent to the site, which are likely to have capacity to serve the potential development, subject to statutory undertaker network capacity analysis. Existing services which cross the site can be diverted and would not prevent development, with the location of existing services likely to be deliverable for new connections to take place for construction of any future development on the site.

### *Flood Risk*

Whilst the HELAA constraints analysis rates the site 'Green' in terms of Flood Risk, the associated comments section makes reference to parts of the site being susceptible to surface water flooding. In support of this representation, Richard Jackson Engineering Consultants have provided a Flood Risk Assessment and Drainage Strategy. The assessment demonstrates that indicative ground conditions demonstrate that infiltration is likely to be suitable. The Flood Risk Assessment also indicates that: the site falls within Flood Zone 1 and is suitable for residential development; there are no existing surface water flooding issues which cannot be accommodated within a drainage strategy; and that the proposals will conform to the SuDS Manual and LLFA guidance for the use of infiltration devices. Furthermore, the site layout produced by Feilden & Mawson allows for surface water flow paths to be accommodated within roads and open space areas.

### *Townscapes*

The illustrative master plan prepared by Feilden & Mawson shows the main north-south access road from The Hops extending southward into the new development then looping round to the east and then north, to connect back to Norwich Road. The proposed development has a grain and density similar to that of The Hops, fitting well to the texture the existing residential 'suburbs' of Hingham to north of the site.

The proposed new entrance from Norwich Road is marked by a small green-space framed by new homes. This could be arranged to have an interesting relationship with the rather formal 'set piece' layout of the contemporary housing development around the southern end of Lincoln Avenue, on the north side of Norwich Road. The remainder of the site frontage is dominated by the retained mature oak trees and hedge, continuing the approach adopted on The Hops. The intention is to preserve the existing leafy character of the approach to Hingham from the east, particularly in this section which is dominated on the north side of Norwich Road by the rather disjointed frontage of the employment area.

A portion of the required public open space (POS) is arranged as an informal green space at the heart of the new development, but the majority is arranged around the eastern, southern and western margins of the new development. This will provide an attractive green margin for the new homes, and be well suited for informal play and dog-walkers from the new development and adjacent existing properties. New homes will be arranged to face outwards across this new 'linear park' to provide good levels of natural surveillance.

The eastern margin of the site is shown with a substantial screen planting zone to soften the impact of the new development in the limited views of the site from the east along Norwich Road. *[Careful consideration will be given to the northern section of this planting zone, to preserve the glimpsed view of the church tower over the roofscape of the new development]*. The southern section of the POS also contains a planted margin, to create a buffer for the existing properties to the south of the site, on Seamere Road (including two listed farmhouses – see 'Historic Environment' below). It also accommodates the necessary swales

and infiltration basins for the sustainable drainage system. The western leg of the POS works with the open green-space running down the eastern flank of the Hops to provide an attractive setting for the existing public right of way that connects Norwich Road in the north to Seamere Road in the south.

Overall, the illustrative masterplan shows how site, whether developed in its entirety or in phases, offers good potential for an attractive, permeable and well-connected development, which fits neatly into its immediate and wider streetscape context.

#### *Biodiversity and Geodiversity*

A Preliminary Ecological Appraisal of the site was conducted by Parker Planning Services in support of this Representation. This report details that the site is typical of an intensive arable landscape, with habitat loss being considered the main adverse impact of development on the site. It is envisaged that the impact of the proposed development could be mitigated via appropriate landscaping and scheme design, with the potential for ecological enhancement.

#### *Historic Environment*

The site is in relatively close proximity to two Heritage Assets which lie to the south of the site: Blenheim Cottage and Lilac Farmhouse which are both Grade II Listed. The concept masterplan created by Feilden & Mawson in support of this Representation demonstrates how a landscape screening belt can be provided to the eastern and southern boundaries of the site. This belt would provide an area of public open space, along with the retention of existing vegetation and provision of new vegetation. The provision of a landscape screening belt will help to screen the development from the surrounding context, ensuring that development on the site will not adversely impact on the nearby Listed Buildings.

The site is also within proximity of both the Hingham Conservation Area and Hingham Church which is Grade I Listed. However, the site is approximately 650m from the Conservation Area, and 970m from Hingham Church. It is considered that a well considered design strategy with suitable mitigation, will ensure that the development of the site does not cause harm to the identified heritage assets.

#### *Compatibility with Neighbouring Uses*

The site lies immediately to the east of The Hops, a recent development of 88 dwellings constructed by Abel Homes (application reference: 2014/2322). Development on the site would constitute a logical and coherent extension to The Hops. To the north of the site is a further recent development of 40 dwellings (application reference: 2005/1787), along with Hingham Industrial and Business Centre, which comprises a mixture of business and industrial uses. To the east of the site is open farmland, and to the south is a limited number of dwellings with farmland beyond.

Therefore, it is evident that residential development on the site would be highly compatible with neighbouring uses, as demonstrated by the allocation and subsequent development of The Hops development. As detailed above and demonstrated on the supporting material prepared by Feilden & Mawson, the site provides a logical extension to the village and the provision of a landscape screening belt would aid the transition between the development and the surrounding environment; shielding views of the development from the surrounding countryside.

#### Summary

In conclusion, it is clear from the above that the site whether developed in part or in its entirety, is entirely suitable for residential and associated development. The technical evidence submitted alongside this Representation, including the indicative masterplan documents, demonstrates that there are no constraints to the delivery of the site.

### ***Available***

The site is controlled, in its entirety, by Abel Homes; and is leased to a local farmer on a temporary basis, which can be terminated with the agreed notice period at any time.

It is anticipated that development on the site would be both available and developable in 1 to 5 years.

Abel Homes are committed to providing contemporary, award winning homes across the region. Abel Homes have demonstrated this dedication, and their commitment to bringing new homes to Hingham, through the recently completed Hops development. The Hops development was submitted to South Norfolk's planning department in November 2014, approved in May 2015, and has nearly been entirely completed. The rate of delivery therefore for the Hops was three and a half years. A similar delivery rate would be assumed for this site.

### ***Achievable***

Based on the suitability assessment above, there are no site-specific constraints which could threaten the delivery of residential development on the site. Through the provision of The Hops, Abel Homes have demonstrated that they are committed and able to achieve the delivery of housing of large scale housing developments, within 5 years.

Therefore, residential development on the site is deemed to be entirely achievable.

### ***Viable***

Development of the site for residential purposes is considered viable, taking into consideration the various policy requirements in relation to matters such as affordable housing provision and CIL contributions. This was demonstrated through The Hops development, which delivered CIL and policy compliant levels of affordable housing. Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary.

### **Summary**

As outlined above, the site is suitable, available, achievable and viable, and is therefore developable. Development in this location would represent sustainable development, as defined within the National Planning Policy Framework. Hingham, as a Key Service Centre, is identified as a suitable and sustainable location which can accommodate additional development and, as such, is likely to be identified as a location to accommodate some of the additional dwellings required during the period to 2036. The foregoing text demonstrates that this specific site is a suitable location for further development in all respects and is capable of accommodating development that ranges from approximately 40 to 250 units.

Economically, the site represents the right land in the right place at the right time. Residential development on the site would help to support and sustain the local economy in Hingham, and would support the long-term planned economic growth of the Greater Norwich Area. As well as providing jobs during construction, the development would provide high-quality and desirable homes within easy reach of key employment areas, notably Norwich and the Main Towns.

Socially, the scale of development envisaged is such that it will enable the creation of a strong, vibrant and healthy community, which is well related and connected to the existing facilities on offer in Hingham, such as the Primary School, Co-op Food, White Hart Pub, Library, and Doctors Surgery. A mixture of dwelling types, sizes and tenures will be provided, informed by local housing need, and CIL payments made will help to provide and enhance the local facilities on offer in Hingham. The provision of residential dwellings on the site will, therefore, help to meet the future housing needs of Hingham.

Environmentally, the site benefits from existing access to sustainable transport, with Hingham being well connected via bus. These bus services provide relatively frequent services into Norwich City Centre, Watton, Shipdham and Easton College. This provides residents the option to utilise sustainable transport

methods, as well as connecting to a variety of employment opportunities, particularly to those on offer in Norwich City Centre.

On this basis, the site should be taken forward as an allocation for residential development in the emerging Greater Norwich Local Plan.