

Greater Norwich Local Plan: Regulation 18 Consultation

General Response Form

Thank you for responding to the Regulation 18 consultation on the emerging Greater Norwich Local Plan. If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email gnlp@norfolk.gov.uk

It is easier to respond online at www.gnlp.org.uk . If you cannot do this, please use this form to respond to the:

- Growth Options document – there are 66 questions covering the Vision and Objectives, Strategy and Topic Policies. There is no need to answer all the questions – just respond to those you are interested in;
- Site Proposals document for commenting on submitted sites and development boundaries (you'll need the Site Submission form to submit additional sites);
- Interim Sustainability Appraisal;
- Evidence Base.

All documents are available from www.gnlp.org.uk

Hard copies of the documents are available at consultation "Deposit Points" at:

- County Hall, Martineau Lane, Norwich (main reception);
- City Hall, St Peters Street, Norwich (2nd floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

Submitting your Response Form

Responses should be made electronically on the webform which is available at www.gnlp.org.uk . Alternatively this response form can be downloaded and submitted by email to gnlp@norfolk.gov.uk

Completed hard copy forms can also be sent to:

Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX

All submissions should be made on or before **5pm on Thursday 22 March 2018**.

Please note that anonymous submissions cannot be accepted.

Contact Details: G.H. Allen (Farms) Ltd

Agent Details	
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Please make your comments below. Please use a separate form if you are commenting on more than one document. Please clearly state the paragraph and page number your comments refer to.

Document (please tick as appropriate)		
Growth Options consultation document	Site proposals consultation document	Interim Sustainability Appraisal
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Evidence Base	Caravans and Houseboats	<input type="checkbox"/>
	Employment, Town Centres and Retail Study	<input type="checkbox"/>
	Habitats Regulation Assessment (HRA)	<input type="checkbox"/>
	New Settlements Topic Paper	<input type="checkbox"/>

Evidence Base	Strategic Flood Risk Assessment (SFRA) ¹	<input type="checkbox"/>
	Strategic Housing Market Assessment (SHMA)	<input type="checkbox"/>
	Viability Study	<input type="checkbox"/>
	Housing and Economic Land Availability Assessment (HELAA)	Please respond to the Site Proposals document quoting the site reference number if you have comments to make on individual site summaries or on the HELAA process

Comments (please clearly state the paragraph and page number your comments refer to). You can respond to as many questions as you wish below, but if you are responding to more than one document, please submit a separate form for each document.

Introduction

These representations have been prepared by Savills (UK) Ltd on behalf of 'G. H. Allen (Farms) Ltd' in respect of land within its ownership at Hempnall.

G. H. Allen (Farms) Ltd owns land currently allocated at HEMP 1: Land at The Willows, south of Bungay Road, Hempnall. This site remains suitable, available and achievable for the delivery of approximately 20 dwellings. It is anticipated that the site should be developed out by the end of 2021.

Hempnall

The adopted Joint Core Strategy for Broadland, Norwich and South Norfolk classifies Hempnall as a 'service village' (policy 15) and is considered suitable to accommodate development appropriate to the scale and needs of the village and its immediate surroundings.

The adopted South Norfolk Site Specific Allocations Policies Document states at 190 that "*The settlement has a good range of social and community facilities including a primary school, a number of shops, surgery, garages and village hall. The village has the benefit of mains sewerage.*"

It is noted that the settlement of Hempnall was originally a linear settlement based on the historic road network. Over time the settlement has expanded as a result of

¹ Please note that whilst a hard copy the main SFRA document is available at the Deposit Points, the remaining documents (maps etc.) are only available online – follow the links from [here](#)

modern estate and infill development. It is considered that the settlement can support additional sustainable development, in addition to that currently allocated.

On behalf of G. H. Allen (Farms) Ltd four sites were submitted in response to the Call for Sites for consideration for residential allocation in the emerging Local Plan:

- GNLP 1015 – Land adjacent to the Primary School
- GNLP 1016 – Land at Bussey's Loke
- GNLP 1017- Land at Broaden Lane
- GNLP 1018 – Land south of Millfields

The Greater Norwich Housing and Economic Land Availability Assessment (HELAA) has assessed the above sites and found them all to be suitable for residential development.

It is acknowledged that the HELAA raises concerns about the impacts associated with residential development at the following sites.

- GNLP1016 – Land at Bussey's Loke - concern about impact upon historic environment, transport and roads.
- GNLP1017 – Land at Broaden Lane, Hempnall – concern about impact upon transport and roads.

Subsequently G. H. Allen (Farms) Ltd requests that the Greater Norwich Development Partnership considers the following preferred sites for residential allocation.

- GNLP 1015 – Land adjacent to the Primary School
- GNLP 1018 – Land south of Millfields

GNLP 1015 – Land adjacent to the Primary School

Townscape/ Landscape: The 'Site Proposals Document' states that development in this location will have an impact on the landscape and townscape. It is acknowledged that there will be a change as a result of built development in this location however the HELAA has not highlighted this as an area of concern. In addition it is considered that additional landscaping along the northern boundary of the site and an architectural style which responds to the local context will be an appropriate addition to Hempnall.

Site capacity: It is noted that the HELAA has assessed the development potential of approximately 50 dwellings however we wish to reiterate to the Greater Norwich Development Partnership that G. H. Allen (Farms) Ltd wishes to pursue fewer dwellings at the site. A 'Vision Document' was prepared by Savills Urban Design Studio and is submitted to explain the design concept for the site. It is considered that this site could deliver approximately 19 residential dwellings.

Access: An 'Access Statement' has been prepared by WSP to support the proposal. This report outlines the proposals to improve the existing access arrangements serving the site and the adjacent primary school. In addition, it is proposed that that

the existing access to the Manor Cottages will be closed and provided through the site.

The site offers the opportunity to respond to provide additional car parking associated with Hempnall Primary School. Initial designs have proposed 11 spaces to be used as overspill car parking.

The site is located central to existing facilities and services at Hempnall. In addition the site is well related to existing bus stops served by the 84 service. This provides public transport links to surrounding settlements and Norwich.

Flood Risk: The Government's Flood Risk Mapping illustrates that the site is located in Flood Zone 1, the lowest risk of flooding (from rivers or the sea). It is acknowledged that the site is at 'low risk' (between 0.1% and 1%) of flooding from surface water. The detailed design of the residential development would adequately address flood risk and drainage at the site. The drainage solution would ensure that it would not create problems elsewhere.

Biodiversity: Initial illustrative designs have illustrated that the site can be developed whilst retaining and enhancing the existing hedgerow and trees at the site. In particular there is an opportunity for new planting along the northern boundary of the site increasing the potential for biodiversity. The initial proposal designs have incorporated an area of public open space at the site for use by existing and future residents.

The HELAA assessment refers to the proximity of the site to SSSIs including "Fritton Grange Meadows SSSI" (also known as 'Fritton Common SSSI'). Any planning application at the site would need to be supported by a Preliminary Ecological Appraisal and necessary surveys to consider the potential impacts of residential development and will outline if there is a requirement for specific mitigation measures. It is considered that a development of approximately 19 dwellings is unlikely to give rise to impacts which would act as a constraint to development at this location.

Conclusion: We agree with the HELAA conclusions that 'Land adjacent the Primary School, The Street, Hempnall' is suitable for residential development of approximately 19 dwellings. As detailed above it is considered that the matters of access, flood risk and biodiversity can all be adequately addressed through detailed solutions at the application stage.

G. H. Allen (Farms) Ltd reiterates that this site remains available for residential development. It is confirmed that subject to securing planning permission, the site can be delivered within the emerging plan period.

GNLP 1018 – Land south of Millfields

It is reiterated by G. H. Allen (Farms) Ltd that 'Land South of Millfields, Hempnall' remains available for residential allocation.

It is intended that vehicular access to the site would be taken via Field Lane. Whilst pedestrian links could be provided to the allotments and Mill Road beyond.

The HELAA notes the existing access is constrained but not insurmountable to development in this location. Should the Council identify this site as a proposed allocation our client will be happy to engage with highways about a detailed access solution.

In addition it is considered that impacts as a result of development in the location relating to landscape, townscape, biodiversity and the historic environment could be adequately addressed through the detailed design of development in this location and the incorporation of necessary mitigation measures.

Greater Norwich Growth Options Document

1. Do you agree with the draft vision and objectives for the plan below? (page 17)

Yes. In principle we support reference to 'growing vibrant, healthy communities'. However, due regard should be placed on ensuring a 'thriving' rural community, a core principle of the National Planning Policy Framework (NPPF) and one reaffirmed by the 2018 Draft NPPF.

9. Housing Growth Options

All of the options for growth suggested direct growth to the rural area which is consistent with the provisions of the NPPF and the proposed vision for the Greater Norwich Local Plan. It is important that the emerging Local Plan acknowledges the benefits of allocating small and medium sized allocations throughout the Greater Norwich area.

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

It is considered that option SH1 is an oversimplified approach and does not reflect the reality of day to day life within rural communities. Option SH2 is preferred.

Appendix 3 of the 'Options Document' classifies Hempnall as a 'Service Village' and it is considered to be one of the most sustainable service villages given the list of services acknowledged on page 143 of the 'Options Document'.

It is however incorrectly stated at page 143 that Hempnall does not have a healthcare facility however there is a GP Surgery at Mill Road. In addition Hempnall secondary school pupils attend the nearby Long Stratton High School.

In light of this corrected position it is requested the Council reconsider the classification of Hempnall and whether it may be more suited to being a Key Service Centre (KSC) as it is acknowledged at paragraph 4.113 that not all KSCs benefit from a high school.

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

It is noted at paragraph 4.154 of the 'Options Document' that in order to enable more growth to support the social sustainability of villages the Councils are considering grouping villages thereby taking greater account of the proximity of existing services and facilities support is given to this approach.

Option SH2 is consistent with the NPPF and its support for thriving rural communities, a core principle of the NPPF and one reaffirmed by the 2018 draft NPPF. Paragraph 55 of the NPPF outlines that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The Draft NPPF 2018 has placed further emphasis on the importance of rural housing (draft paragraphs 69 and 80).

a) It is considered that distance to the nearest facilities, service village, service centre or main town should be the relevant in defining groups and to reflect paragraph 55 of the NPPF.

b) Due regard should be given to the proximity of Hempnall to Long Stratton. In addition the services at Hempnall benefit a range of surrounding smaller settlements and this relationship should also be considered.

c) Due regard should be given to appropriate services within the village group and the benefits of development in each location.

The Draft NPPF 2018 consultation has placed further emphasis on the importance of rural housing.

The Government is committed to boosting the delivery of new homes on smaller and medium sized sites which can be delivered quickly and make an important contribution to the overall supply of new homes.

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

Residential growth in rural settlements could increase demand for sustainable modes of transport such as bus services. Development in the rural area would act as an opportunity to encourage utility providers to update and improve infrastructure locally.

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

Option AH2 - A proportion of affordable housing would be sought on all sites of 11 or more dwellings (or 0.5 hectares or more)

At present there is Government guidance which suggests that local planning authorities should not require affordable housing to be delivered on development sites of 10 homes or less or 5 homes or less in designated rural areas (and only then it is an off site financial contribution). The aim being to encourage the delivery of new homes in rural areas on small sites where financial viability can be more marginal. However, as this is currently only guidance, local planning authorities have

had discretion as to whether or not to apply it and have often chosen not to. The draft NPPF seeks to overcome this issue by converting the guidance into Government policy. This is an important distinction, which should provide much needed certainty to landowners and developers and help to boost the delivery of new homes on smaller rural sites.

Please add additional sheets if necessary

Disclaimer

Data Protection and Freedom of Information

The Data Controller of this information under the Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

Declaration

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name Lydia Voyias

Date 22/ 03 /2018

Greater Norwich Regulation 18 General Response Form

FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

Your completed form should be returned to the Greater Norwich Local Plan team no later than **5pm on Thursday 22 March 2018.**

By email: gnlp@norfolk.gov.uk

Or, if it is not possible submit the form electronically,

By post to:

*Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX*

Further advice and guidance can be obtained by visiting the Greater Norwich Local Plan website or by contacting the Greater Norwich Local Plan team directly:

Website: www.gnlp.org.uk

E-mail: gnlp@norfolk.gov.uk

Telephone: 01603 306603