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Date: 22 March 2018

Greater Norwich Projects Team
c/o Norfolk County Council
County Hall
Martineau Lane
Norwich
NR1 2DH

Dear Sir/Madam

GNLN REGULATION 18 CONSULTATION RESPONSE – HETHERSETT (SITE REF: GNLN0177-A)

Introduction

Pigeon Investment Management Ltd ('Pigeon') are promoting land north and west of Hethersett, (site reference GNLN0177-A) as a sustainable location for up to 1500 new homes, open space, infrastructure and a range of community benefits.

Pigeon's representations include a Constraints and Opportunities Plan (drawing no. xx52/003) and an Initial Concept Masterplan (drawing no. xx52/004), which define the ability for land at GNLN0177-A to delivery up to 1500 new homes.

Pigeon has been recently appointed to promote this land and a whole suite of technical work is being undertaken, with Core Reports already completed to further understand the technical matters relating to this site and its delivery. Together with extensive community and stakeholder engagement that will be undertaken by Pigeon, it is anticipated that the masterplan concepts will continue to evolve with the promotion of the site.

However, the submitted Concept Masterplan sets out the land that is available for development that could deliver up to 1500 new homes, reflecting the current options for development within the south-western sector within the current consultation document, notwithstanding Bidwells' representations on the overall housing requirement for the Plan. The majority of growth within the south-western sector is anticipated to be located at Hethersett with more limited capacity identified at Cringleford, and Little Melton being a much smaller settlement without the necessary services and infrastructure to accommodate the necessary level of growth.

The Initial Concept Masterplan sets out a series of development parcels for residential and commercial use that gives a flexibility to new homes in this location. Whilst this representation sets out the rationale for approximately 1500 new homes in this highly sustainable location, the individual development parcels also allow for a lower scale of new homes to be brought forward, as well as providing excellent opportunities for some parcels to be brought forward early. In particular, the western parcels and particularly those either side of Hethersett Road have strong potential to be brought forward in the short term to meet housing need and demonstrate delivery in accordance with the draft NPPF.

Pigeon are currently preparing a Delivery Statement, which will be subsequently submitted to the GNLP with the full suite of technical reports, setting out further the ability to deliver new housing in Hethersett, together with a range of community benefits and an understanding of infrastructure requirements. This approach has been agreed in discussions with GNLP Officers and will also be informed by on-going stakeholder engagement.

Whilst technical work is ongoing, these representations provide an interim response to the HELAA's Constraints and Impacts analysis in respect to those matters that have been given an amber rating, which are not untypical for a scheme of this scale and can be suitably addressed. This is confirmed within the HELAA's conclusions that the site is suitable for new homes.

In summary, Pigeon are of the opinion that the highly sustainable nature of Hethersett as a location means that it should secure an allocation at the upper end of the 1500 new homes for the south-west sector proposed under the current consultation. This upper level of development will also secure a range of community benefits from the new homes that could not be delivered at a lower level including the following: -

- Ability to provide a more comprehensive solution to school capacity within Hethersett. Pigeon has identified opportunities to expand the current High School site and discussed the potential for new facilities to enhance specialised teaching of science, engineering and technology, which are particularly beneficial given the proximity of the site to Norwich Research Park (with a new cycle link from the current allocation) and Hethel. There is also the ability to reorganise the current 3-tier school provision with the potential delivery of a new Primary School which could ease pressure on Queen's Road through the centre of Hethersett.
- Significant green and biodiversity corridor running east to west to the north of the current allocation bringing significant ecological enhancement and meeting an identified deficit in open space.
- Commercial allocation bringing forward employment opportunities in a sustainable location in close walking and cycling distance to Hethersett.
- Potential additional off-site benefits from the same landowners including potential expansion of the park and ride site enhancing sustainability for both Hethersett and those travelling to Norwich from the north-west.

Site Reference and Location

On behalf of Pigeon, we strongly believe that site GNLP0177-A should be allocated for residential development, comprising up to 1,500 dwellings, with associated open space and associated infrastructure. 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 'developable', set out in footnote 12 to paragraph 47, the site represents a suitable location for housing development, and there is a reasonable prospect that the site is available and development could begin in the short-term to assist in meeting 5yr land supply. These points are addressed in further detail below.

Assessment of Deliverability

Suitable

The site is located within Hethersett, and also the Norwich Policy Area (NPA) that is the focus for major growth and development as identified in Policy 9 of the Joint Core Strategy (JCS). Allied to this status of providing at least 1,000 dwellings, Policy 9 also specified that Hethersett is one of the sustainable settlements that would be suitable for additional development, if necessary, to help deliver the 'smaller sites in the NPA' allowance of 1,800 dwellings.

It is evident, therefore, that Hethersett is a suitable location for further growth, based on current policy, and that this site can accommodate a significant proportion of the growth planned for South Norfolk in the period to 2036, as shown in all 6 potential growth options for the 'South West' sector (ranging from 150 to 1,500 dwellings).

In respect of the Site Specific Allocations and Policies Document (Adopted October 2015) site GNLP0177A lies directly adjacent (to the north and west) of a number of existing allocations, namely Policy HET 1 (Land north Hethersett), Policy HET 2 (Land north of Grove Road), Policy HET 3 (Land west of Poppyfields), and Policy HET 4 (Land north of Great Melton Road). Furthermore, HET 1 was subject to a successful outline planning application (2011/1804/O in 2013 for a 'Residential led mixed use development of 1196 dwellings and associated uses including Primary School, Local Services (up to 1,850 square metres (GIA) of A1, A2, A3, A4, A5, D1 and B1 uses) comprising shops, small business units, community facilities/doctors surgeries, sports pitches, recreational space, equipped areas of play and informal recreation spaces. Extension to Thickthorn Park and Ride including new dedicated slip road from A11'. The site is currently being developed.

As such, the land would ultimately be immediately adjacent to residential development to the south and east and consequently represents a logical extension to the planned growth in this area.

In terms of more detailed site-specific considerations, the Housing and Employment Plan Availability Assessment (HELAA) published with the current consultation 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 market attractiveness, townscapes, historic environment, or compatibility with neighbouring uses.

Issues which are given an 'Amber' rating, or are specifically referred to within the text of the Site Proposals consultation document, namely; access, accessibility to services, utilities capacity, utilities infrastructure, contamination and ground stability, flood risk, significant landscapes, biodiversity and geodiversity, open space and green infrastructure, and transport and roads, are addressed in more detail below.

Notwithstanding these amber ratings, within the 'Site Proposals' document that accompanies the 'Growth Options' document for this consultation it is pertinent to note the remarks contained within the Settlement Summary for Hethersett, in respect of the site (GNLP0177-A). This states that *"There are a number of constraints but the scale of the area is likely to provide the potential for mitigation"* (p.220, GNLP Site Proposals document). Likewise, the HELAA site assessment states; *"Given the potential scale of development, it is likely that mitigation could be found for the known constraints."* It is considered that this representation, should be considered in this context.

Constraints Analysis

Access to Site and Accessibility to Services/Transport and Roads:

A Transport Site Appraisal has been prepared by AECOM to seek to demonstrate the site's suitability in terms of connectivity to the existing walking, cycling and public transport facilities as well as local amenities and facilities.

The Appraisal demonstrates that the development site is provided with good links to existing facilities and amenities within Hethersett with services within a reasonable walking or cycling distance along existing routes conducive to both modes. The existing infant, junior and high schools are also within walking and cycling distances of the site.

In respect of public transport provision, there are a number of existing bus stops located within a reasonable walking distance of the site which are served by highly frequent services that serve a range of destinations including Norwich, Wymondham, Attleborough and Watton. Thickthorn Park and Ride is also within a ten-minute cycle of the proposed site, whilst the Park and Ride provides services every 15 minutes to Norwich City Centre.

The specific design of site accesses to provide vehicular access would be defined following preparation of a Transport Assessment at planning submission stage. Depending upon the quantum of development, and how the site is subsequently parcelled, single points of access could be provided. Alternatively, a spine road within the site could be provided linking Great Melton Road in the west to Colney Lane in the east.

Notwithstanding the existing provision, in order for the development to come forward it is recognised that a range of mitigation may be required, including improvements to the pedestrian and cycle network within Hethersett to link to existing provision, provision of enhanced bus services and infrastructure, and the implementation of a Travel Plan for all aspects of the proposed development. AECOM's report demonstrates that the mitigation measures are all deliverable, commensurate with the potential scale of the proposals.

Utilities Capacity & Utilities Infrastructure: –

Pigeon are currently preparing a Delivery Statement, which will be subsequently submitted to the GNLP with the full suite of technical reports. At this stage, Pigeon are unaware of any significant constraints that cannot be mitigated or would prejudice development.

Contamination and Ground Stability:

Ground conditions on the site are stable. It is understood that there was no objection from the Council's Environmental Services Officer to the scheme approved directly to the south subject to appropriate conditions that deal with any possible ground contamination (2011/1804/O) and accordingly given this site's close relationship there is also no evidence to suggest that the site would be contaminated, mindful that the majority of the site consists of arable land. However, any potential for ground contamination issues on the site will be investigated, and evidence produced, in due course.

Flood Risk:

The accompanying Flood Risk and Surface Water Drainage Statement demonstrates that the site is not in an area of fluvial flood risk, the whole site being located within Flood Zone 1 (Low Risk). As such the site meets the requirements of the Sequential Test in directing development towards areas with the lowest flood risk.

Whilst there are minor areas of overland surface water flow within the site, surface water flooding will be managed through the design process to ensure no flooding of dwellings and other buildings within the development. Surface water flooding is not therefore a constraint on development. There are no flood risks from reservoirs or other manmade sources.

Surface water runoff from the development site will be managed using SuDS methods, conforming to the Surface Water Drainage Hierarchy (SuDS Manual 2015 (C753)). As such, firstly where conditions are suitable surface water will be discharged by infiltration to the ground, and secondly by discharge to local watercourses. Discharge rates to watercourses will be controlled to the natural (greenfield) runoff rate for the equivalent storm event.

As such, the site is located within an area of low flood risk and surface water runoff can be adequately managed to ensure no adverse flood risk impacts upon new on-site, and off-site development or the wider environment.

Impacts Analysis

Significant Landscapes:

Liz Lake Associates have undertaken a review of South Norfolk Council's 'Local Landscape Designations Review – Strategic Gaps/Important Breaks' Report (September 2012) that informed the Strategic Gap policy (DM 4.7) contained within the Council's Development Management Policies Document (Adopted October 2015).

Liz Lake's Review acknowledges the importance of the Strategic Gaps and their sense of openness, including the presence of fields, hedgerows and woodland blocks that all contribute to the setting and separate identities of the adjacent settlements. In so doing it recommends that the provision of open space, woodland and grassland could be provided for through a well-considered development framework, that would include enhancements to the existing Public Right of Way network and the permissive routes, and the provision of meaningful Green Infrastructure. These benefits to local communities would ensure increased public access to the countryside, whilst retaining the identity of the individual settlements of Hethersett and Wymondham by preventing their merging or coalescing.

Liz Lake Associate's will have continual engagement in the evolving masterplan to ensure a high quality, landscape-led design solution,

Biodiversity and Geodiversity:

A Strategic Ecological Assessment of the proposal land has been undertaken by Hopkins Ecology, with a view to identifying the sites constraints and opportunities. Consisting of a desk study and field survey the appraisal identifies that there are no sites with statutory designations within or near (i.e. within 5km) the survey area, with a single County Wildlife site (Beckhithe Meadow) within the survey area.

It is considered that the impacts on sites and the majority of species can be mitigated, whilst appropriate landscaping and scheme design will have the potential to contribute new habitat areas relevant to green infrastructure corridors, most notably the significant biodiversity corridor running through the site.

Open Space and Green Infrastructure:

As indicated on the enclosed Initial Concept Masterplan (xx52/004) the provision of open space and green infrastructure is a fundamental element of the strategic promotion of the various development areas. Within the Site Specific Allocations and Policies Document (October 2015), Hethersett was identified within the Open Space Study (2007) as having a local deficiency in natural/semi-natural greenspace and informal amenity space. Similarly, the Greater Norwich Green Infrastructure Delivery Plan also identifying a shortage of this type of accessible open space.

In recognising this context, the Masterplan provides significant green infrastructure opportunities, to include a green corridor running in an east to west axis, together with the potential for publicly accessible woodland or grassland.

Initial Concept Masterplan:

Mindful of the HELAA, its constraints and impacts analysis, and the technical evidence responding to these matters as summarised above (and in the accompanying reports), an Initial Concept Masterplan (Drawing No. xx52/004) has been developed as informed by a Constraints Plan (xx52/003), both of which are attached to this representation.

The Initial Concept Masterplan clearly shows five distinct parcels of land that could accommodate residential development (Areas A to E inclusive) together with land for employment uses and a potential new school site (adjacent Area E). The specific parcels would allow phasing of development to reflect the quantum of development that may be directed to Hethersett.

Accordingly, it is proposed that the land promoted could accommodate up to the 1,500 new homes for the South West Sector as outlined within Option 3 via linkages with current development parcels, without developing within the Strategic Gaps (between Hethersett and Wymondham, and Hethersett and Cringleford).

Furthermore, the Concept Masterplan also incorporates meaningful and significant elements of Green Infrastructure, with a green corridor along the east to west route of the electricity pylons, allied with, for example, the provision of new woodland, hedges, trees, and the reinstatement of lost hedgerows, in accordance with the findings contained within the Liz Lake Associates report, attached to this consultation response.

Development to the west of Hethersett also provides the opportunity to soften the built edge in this location when viewed from the countryside.

Available

The site is currently in agricultural use and has an existing landowners agreement in place encompassing all of the promoted land. The landowners also control further tracts of land around Hethersett. As such, the ability for additional land to be included within the agreement should it be needed exists. The landowners have a track record of securing promoters, obtaining planning consent and releasing land for development, as evidenced by the Hethersett North Planning Consent (2011/1804/O) on the adjacent land.

The landowners have subsequently appointed Pigeon Investment Management Limited to promote the site through the Local Plan process. As one of the leading land promoters in the eastern region Pigeon have an established track record in planning and delivering sustainable new neighbourhoods.

The site land is, therefore, available immediately, and notwithstanding the Local Plan timescale, the parcels to the west provide excellent opportunities for delivery of new homes in this sustainable location.

Viable

Development of the site for residential led purposes is currently considered viable, taking into consideration the various policy requirements in relation to matters such as affordable housing provision and CIL contributions.

Summary

As outlined above, and explored within the accompanying supporting reports, the site is suitable, available, and viable, and is therefore developable. Development in this location would represent sustainable development, as defined within the NPPF. It is evident that Hethersett is a suitable location for further growth and that it can accommodate a significant proportion of the growth (up to 1,500 dwellings) currently planned for the 'South West' sector as outlined in the Strategic Growth Options (notwithstanding Bidwells' comments on the overall housing numbers). Development at the top end of the potential 1500 new homes brings the potential for a range of additional community benefits.

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 Hethersett, 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 the Norwich Policy Area, close to major centres of employment with good public transport links such as the Norwich Research Park (NRP) and the Norfolk and Norwich University Hospital (NNUH).

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, and proposed facilities on offer in

Hethersett in conjunction with the current permission (2011/1804/O) adjacent to the site, that is currently being built out. As well as extensive Green Infrastructure a mixture of dwelling types, sizes and tenures will be provided, informed by local housing need, and the resultant CIL payments made will ensure the provision of necessary infrastructure.

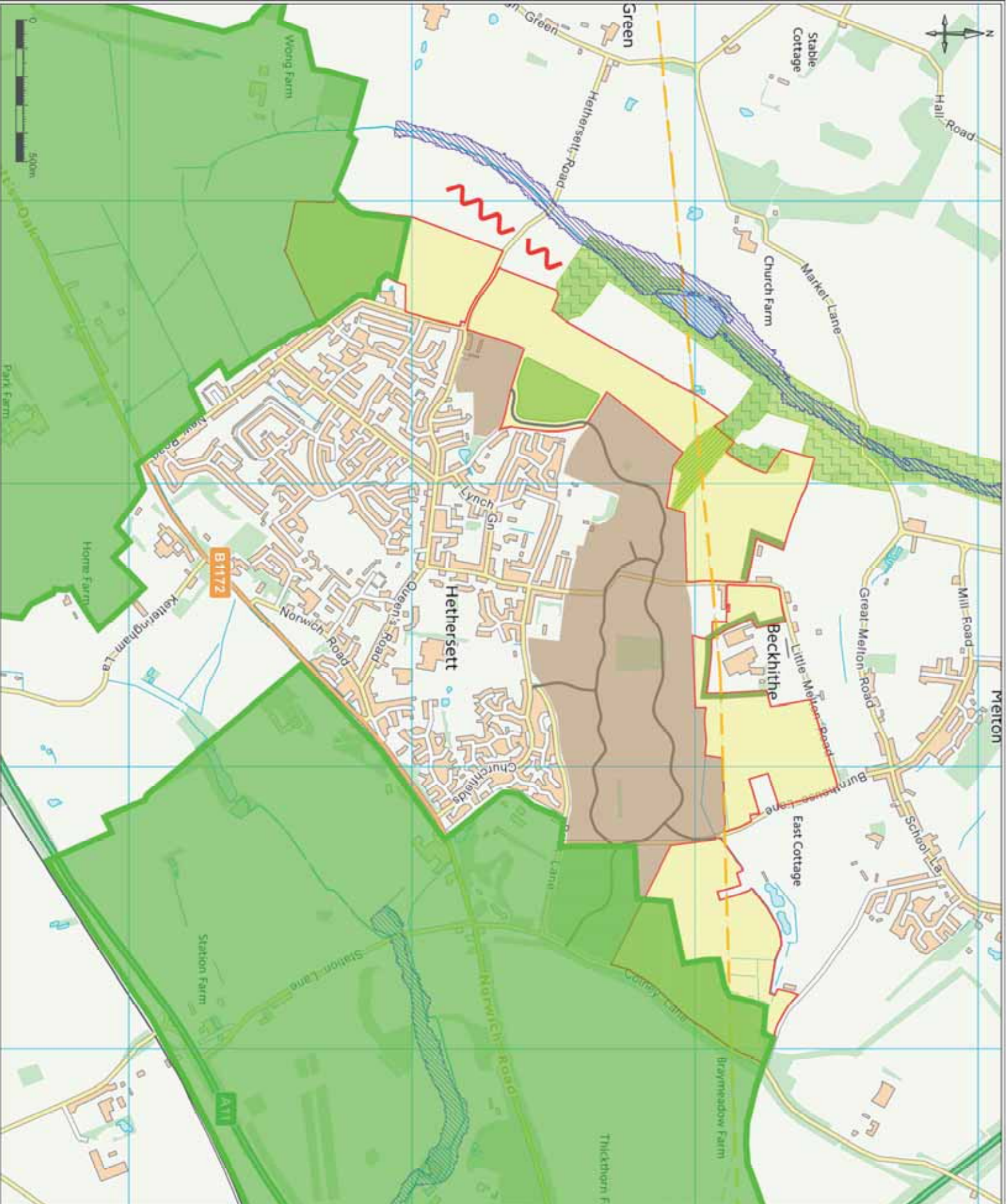
Environmentally, the site benefits from existing access to a range of sustainable transport options, reducing reliance on the private car. Development in this location will also assist in supporting the Bus Rapid Transit (BRT) route identified within the Norwich Area Transportation Strategy (NATS) along Norwich Road in Hethersett, whereby links to this route could be provided from the site, further increasing the viability of bus travel for residents.

On this basis, the site should be taken forward as an allocation, and is capable of making a significant contribution to the planned growth of Norwich in the period to 2036.

Yours faithfully

Darren Cogman
Associate

Enclosures



Notes

1. Do not scale from this drawing.
2. Any dimensions should be checked on site.
3. A Conversion factor of the (10,000sqm) equals 2,471 acres has been used.
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KEY

- Development Underway
- Our Site
- Strategic Gap
- New Highway
- Vegetation Buffer around Factory
- Power Cable (Pylons Route)
- Priority Habitats
- Beckthite Meadow Nature Reserve
- Designated Green Space
- National Flood Zone 3
- Visually Exposed Landscape

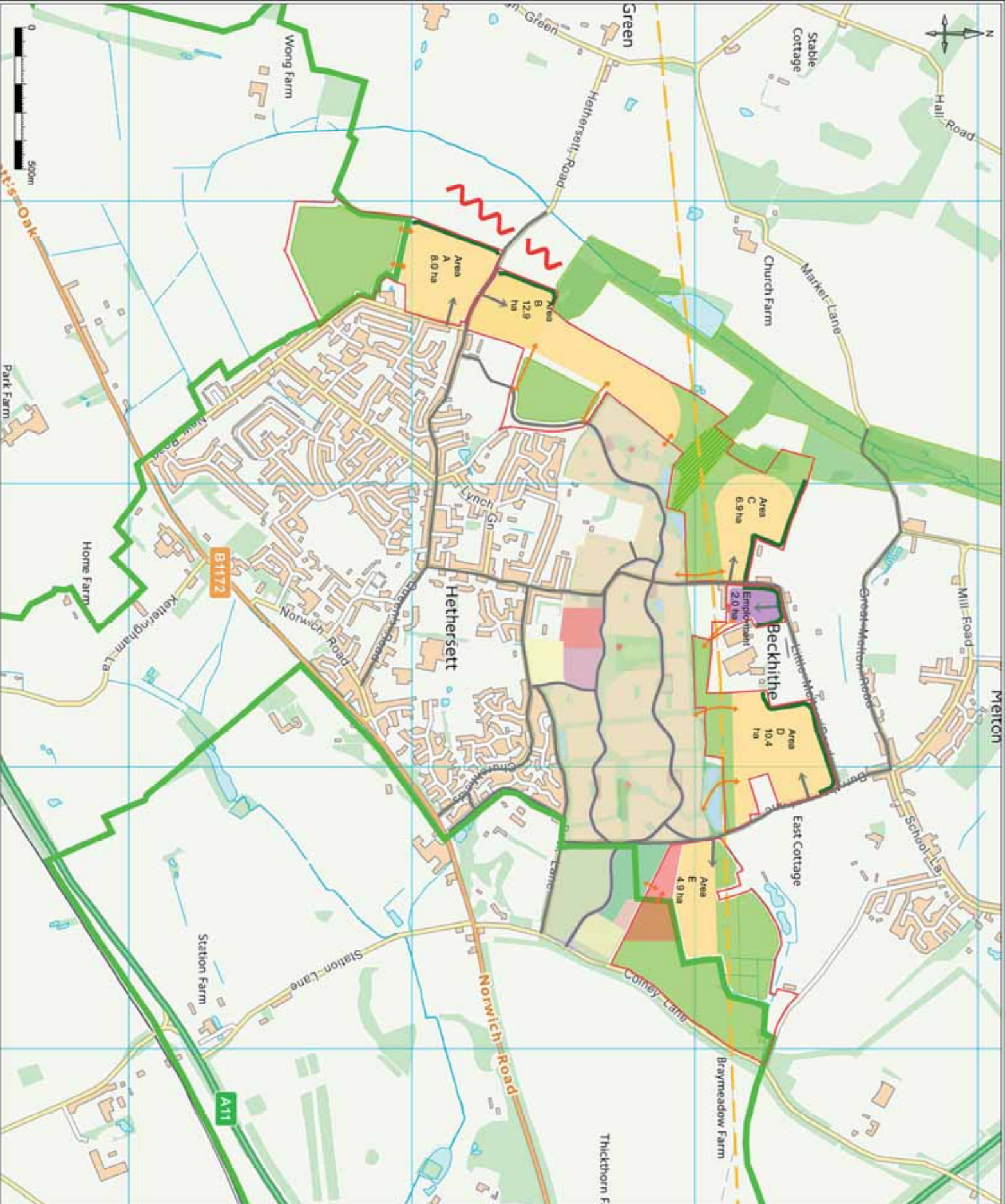
| Rev | Date | Description |
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| - | 06/12/17 | First Issue |


PIGEON
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Constraints Plan

Project Name
**xx52 Hethersett,
 Norfolk, NR9 3NP**

| Drawn | Check | Scale | @ |
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| Date | Drawing No. | Rev | |
| 03/03/2018 | xx52/003 | - | |



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KEY

- Site Boundary
- New Homes
- School Site
- Commercial
- Green Space
- Strategic Gap
- New Highway
- Power Cable (Pylons Route)
- Priority Habitats
- Beckhitha Meadow Wildlife Site

| Rev | Date | Description |
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Drawing Title
Initial Concept
Masterplan

Project Name
xx52 Hethersett,
Norfolk, NR9 3NP

| Drawn | Check | Scale | @ |
|------------|-------------|---------|----|
| MP | - | 1:12500 | A3 |
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