



**Greater Norwich Local Plan  
Focused Regulation 18 Consultation Response  
Proposed Allocation Site Reference GNLP2136**

**Briar Farm, Harleston**

Prepared by Strutt and Parker on behalf of M Scott Properties Ltd  
**December 2018**

Site Name:	Briar Farm, Harleston
Client Name:	M Scott Properties Ltd
Type of Report:	Reg 18 Consultation Response
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## 1. INTRODUCTION

- 1.1 This Consultation Response to the Focused Regulation 18 Consultation to the Greater Norwich Local Plan (GNLP), Housing and Economic Land Availability Assessment (HELAA) Addendum, October 2018 has been prepared by Strutt & Parker on behalf of M Scott Properties Ltd (Scott Properties), in respect of the proposed allocation site at Briar Farm, Harleston.
- 1.2 This consultation response relates to site reference GNLP2136 in the October 2018, HELAA Addendum. However, the extent of the original site shown below will need to be reduced to ensure that only the land proposed for residential and commercial purposes is included.

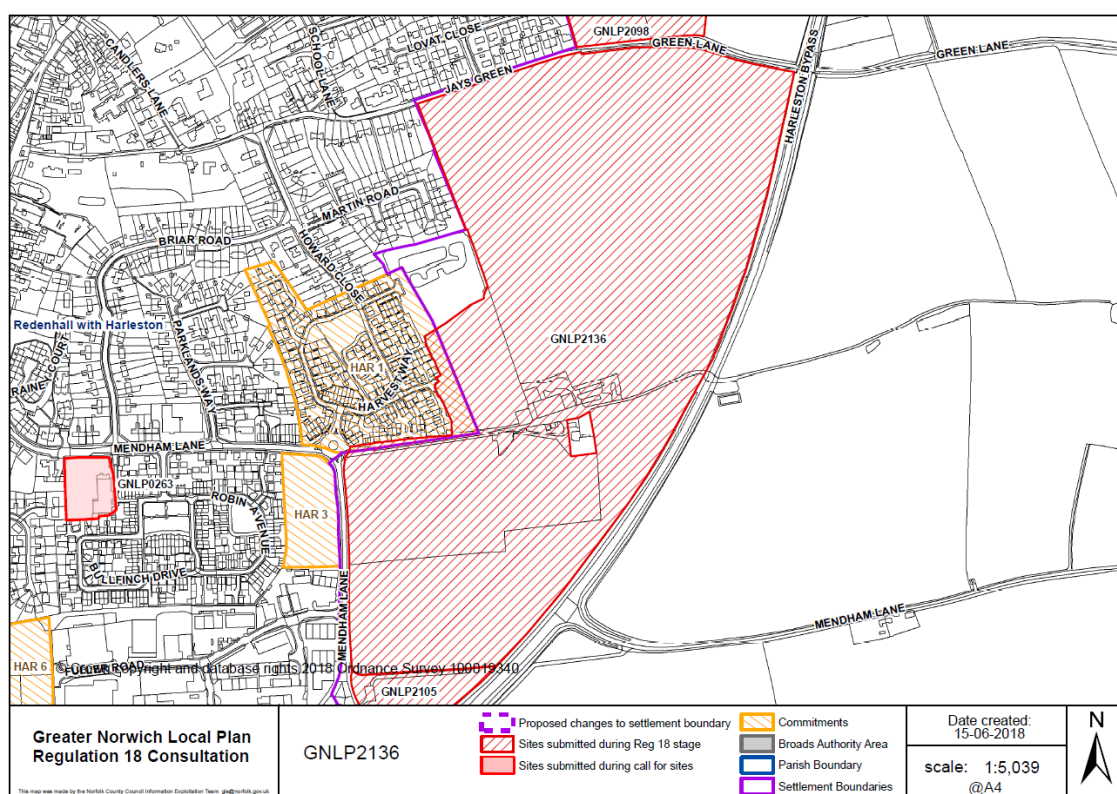


Figure 1: Site Plan

- 1.3 This submission is supported by the following Appendices, consisting of plans, supporting documents and technical assessments:
- App. 1 – Illustrative Masterplan
  - App. 2 – Phasing Plan
  - App. 3 – Experian Demographic Report
  - App. 4 – Gainsford Gardens Brochure
  - App. 5 – Utilities Overview Note
  - App. 6 – Flood Risk Assessment Summary Note
  - App. 7 – Landscape Summary Note
  - App. 8 – Landscape Design Strategy
  - App. 9 – Landscape Viewpoints Location Map
  - App. 10 – Preliminary Arboricultural Appraisal
  - App. 11 – Preliminary Ecological Appraisal

1.4 This report includes the following sections:

- **Planning Policy Context:** identifies the relevant local and national planning policy context within which the proposals should be considered;
- **Proposed allocation site:** sets out the site context, opportunities and constraints and deliverability;
- **HELAA Assessment:** considers the assessment criteria, constraints analysis and impact analysis for the site, and provides additional information/evidence to support the allocation; and
- **Conclusions:** provides a summary of the overall conclusions.

## 2. PLANNING POLICY CONTEXT

### Adopted Local Plan

- 2.1 The subject site of this consultation response falls within the District of South Norfolk where the current development plan comprises a number of documents, the key ones being the Greater Norwich Joint Core Strategy (2014) and the South Norfolk Local Plan – Site Specific Allocations & Policies DPD (2015) and the South Norfolk Local Plan Development Management Policies Document (2015).

### Joint Core Strategy

- 2.2 The Joint Core Strategy covers Broadland, Norwich and South Norfolk and was adopted in March 2011, with further updates in respect of Broadland District adopted in January 2014. It covers the period to 2026 and sets out the long-term vision and objectives for the area, including strategic policies for steering and shaping development and identifies broad locations for housing and employment growth. The strategy seeks to identify space for 37,000 new homes and 27,000 jobs. The focus of housing growth is the Norwich Policy area where 33,000 new homes are identified. Moderate growth is also proposed in the other principal towns and larger villages. There are four Main Towns: Aylsham (300 new homes - subject to resolution of sewage capacity constraints); Diss (300 new homes); Harleston (200 - 300 new homes); and Wymondham (2,200 dwellings – falls within Norwich Policy Area). Policy 13, confirms that these are minimum housing numbers to be accommodated.

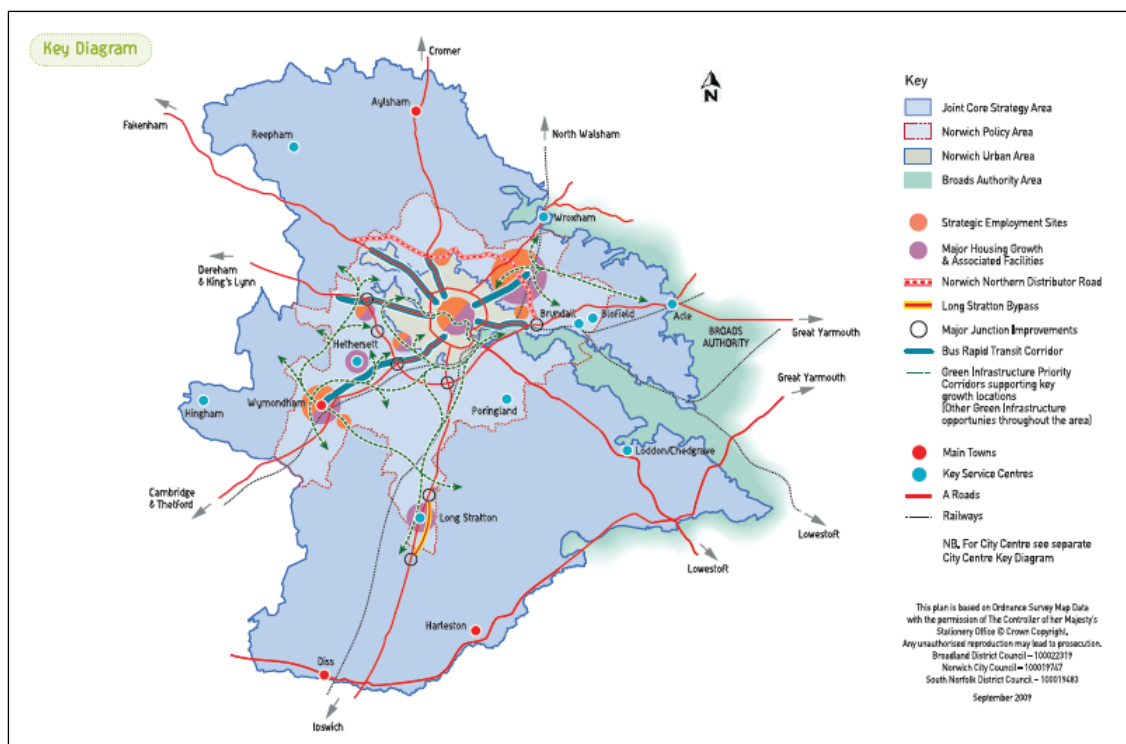


Figure 2: Key Diagram

### **South Norfolk - Site Allocations Document**

- 2.3 The Site Specific Allocations and Policies (Site Allocations) Document is part of the South Norfolk Local Plan. Guided by the Core Strategy, designates areas of land to deliver housing, employment, recreation, open spaces and community uses. The document was formally adopted on 26 October 2015 and covers the period up to 2026.
- 2.4 In accordance with the Core Strategy, a minimum of 13,156 homes was assessed to be the need for the South Norfolk Area. The majority of this growth is focused in the Norwich Policy Area (NPA), which includes the Cringleford Neighbourhood Plan, and the Wymondham and Long Stratton Area Action Plans. Outside the NPA, in the rural part of South Norfolk, the Core Strategy required provision for 2,368 – 2,908 dwellings. The Site Allocations Document identifies 3,149 units by allocating sites for an additional 1,129 on top of existing completions and commitments.
- 2.5 In Harleston, three housing sites were allocated totalling 241 dwellings. These are identified on Inset Map 008 below.

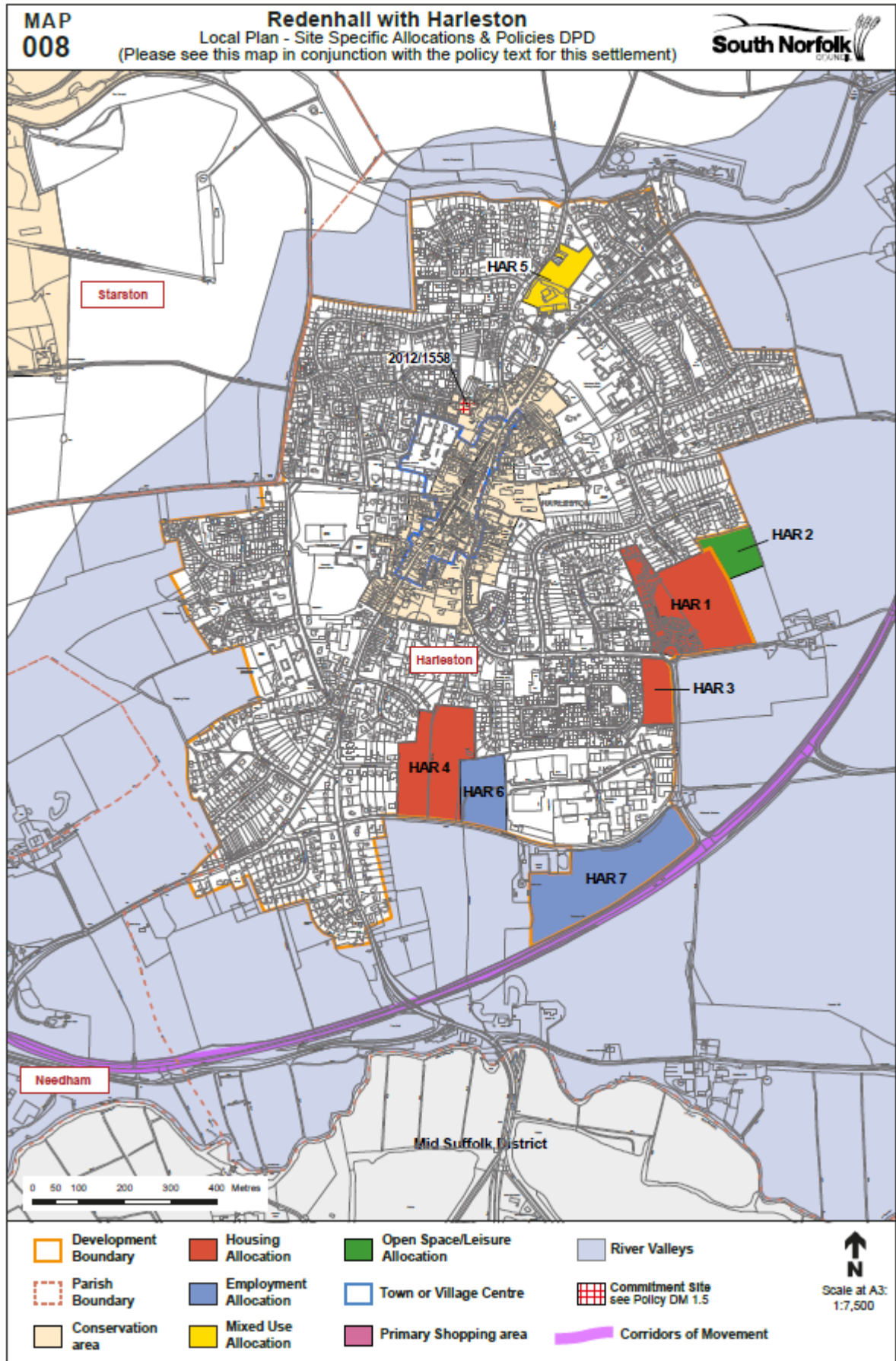


Figure 3: Harleston Inset Map



- 2.6 The Council also committed to an early review of the South Norfolk Local Plan which commenced with the preparation of a new Strategic Housing Market Assessment in 2015.

### **The National Planning Policy Framework**

- 2.7 The “*presumption in favour of sustainable development*” is still at the heart of the National Planning Policy Framework 2018 (NPPF). The Planning and Compulsory Purchase Act 2004 (section 39(2)) establishes a legal requirement for plans to be prepared with the objective of contributing to the achievement of sustainable development.
- 2.8 Paragraph 8 of the NPPF reminds us that for achieving sustainable development the planning system has three overarching objectives, an economic, a social and an environmental objective, which are interdependent, and need to be pursued so that opportunities can be taken to secure net gains across each objective. Paragraph 9 indicates these objectives should be delivered through the preparation and implementation of plans.
- 2.9 For plan-making Paragraph 11 requires that:
- “...plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change...”*
- 2.10 It goes on to require that as a minimum, plans should provide for objectively assessed housing needs of the area.
- 2.11 The 2018 NPPF maintains the Government's commitment to a genuinely plan-led planning system and requires Local Planning Authorities to prepare and keep up-to-date plans which provide a positive vision for the future of their area looking ahead over a minimum 15 year period with regular reviews at least once every five years.
- 2.12 Local Plans have to be positively prepared, in a way that is aspirational but deliverable. They also have to be justified, effective and consistent with national policy.
- 2.13 In respect of housing, planning policies are required to identify specific and deliverable sites for the first five years and further specific and developable sites or broad locations for growth, for years 6-10 and 11-15 where possible, in order to meet their identified housing needs.
- 2.14 In respect of the delivery of a sufficient supply of homes paragraph 59 advises that:
- “...it is important that a sufficient amount and variety of land can come forward where it is needed...”*
- 2.15 Minimum need is now determined using the standard method set out in national planning guidance.
- 2.16 Local authorities are also now required to monitor housing development through the new Housing Delivery Test to support the Government's objective of significantly boosting the supply of homes.

2.17 Currently, the rural parts of South Norfolk are unable to demonstrate a five year housing land supply. Furthermore, at the time of writing the housing delivery figures expected to be published by the Government in November 2018 were still not available.

### **Greater Norwich Local Plan**

2.18 Following adoption of the Joint Core Strategy and site allocation documents for the area between 2011 and 2016, in order to keep the existing Core Strategy and Local Plans up to date work commenced on the new Greater Norwich Local Plan. The new local plan will extend the plan period from 2026 to 2036. Furthermore, the newly introduced stand method to calculating housing needed indicates that 39,000 new homes will be required for the period 2017 to 2036. At April 2017 there were approximately 35,700 sites either allocated or with planning permission, leaving a requirement of a minimum of 7,200 additional sites to be identified in the new local plan.

2.19 The Greater Norwich Development Partnership undertook a Regulation 18 Issues and Options consultation between January and March 2018. This included six proposed growth distribution options and four options for new settlements. No decision has yet been made on the preferred option and it is likely it could be a mix of a number of options. The preferred option will be published in the draft plan consultation, currently programmed for September / October 2019.

### **Housing and Economic Land Availability Assessment**

2.20 A key evidence base document underpinning the plan making process is the Housing and Economic Land Availability Assessment (HELAA). The HELAA is a broad assessment of potentially available land. The national planning practice guidance (PPG) notes that:

*“...the assessment is an important evidence source to inform plan making, but does not in itself determine whether a site should be allocated for development.”*

2.21 In 2016 the HELAA methodology was agreed, and in May 2016 the Greater Norwich authorities launched a Call for Sites. As at 31<sup>st</sup> July 2017, total of 562 sites were submitted. Those put forward for housing, employment and commercial use were assessed through the December 2017 HELAA. The December 2017 HELAA identified approximately 3700 hectares of potentially suitable land which for housing amounted to approximately 69,000 dwellings.

2.22 Over 200 additional or revised sites were submitted between 31<sup>st</sup> July 2017 and 31<sup>st</sup> August 2018. These sites were assessed in the October 2018 HELAA Addendum which identifies approximately a further 1100 hectares of potentially suitable land which after adjustments equates to approximately 22,000 additional dwellings.

2.23 Combining the two assessments indicates the area of land potentially suitable for housing (or mixed use with a significant element of housing) totals some 4800 hectares which could accommodate up to 91,000 dwellings.

### 3. PROPOSED DEVELOPMENT SITE

#### Context

- 3.1 Harleston is an attractive market town and employment centre serving a relatively local catchment. The town lies to the south of Norwich on the A143, which connects to Great Yarmouth in the north-east and Bury St Edmunds to the south-west.
- 3.2 The town is on the southern extremity of the Greater Norwich Local Plan Rural Area, beyond the Norwich Policy Area to the north. Harleston is identified as one of the four Main Towns in Policy 13 of the Joint Core Strategy, suitable to accommodate employment and housing growth in the region of a further 200 - 300 new dwellings to 2026.
- 3.3 Harleston is a compact town that has largely developed on a plateau between the valleys of Starston Beck to the north and the River Waveney to the south. It developed on the convergence of several main roads and was bypassed by the A143 in 1981. The town centre is based on a triangle of roads focused on the market place and includes significant historical buildings such as the clock tower and a series of relatively hidden, enclosed courtyards and yards to the west of The Thoroughfare and to the east of Broad Street and the Old Market Place. The centre's historical significance is reflected by its designated conservation area. The town has a wide range of services and facilities, including town centre shops and a market, primary and secondary education facilities, a library, GP, leisure centre and recreation ground. Local bus services connect to Bungay, Diss, Norwich and Great Yarmouth and the area is also served by a dial-a-ride mini bus service.
- 3.4 The South Norfolk character assessment classes the towns surrounding landscape as mainly Waveney Tributary Farmland, characterised by open valleys with distant views sensitive to development and extensions to its compact settlements.

#### The Site

- 3.5 The site, known as Briar Farm is an undeveloped area of agricultural land to the east of the existing settlement within the arc of the A143 bypass. The site is made up of a number of existing fields with Briar Farm, and its associated farm buildings and hard standings is located in a central position, accessed from the Mendham Lane roundabout. The access road forms Angel's Way, a long distance footpath and public right of way which crosses the site in an east-west direction. The western boundaries adjoin the existing residential development and new residential development sites allocated in the Joint Core Strategy. The Fuller Lane industrial estate lies to the south-west on the western side of Mendham Lane. The southern boundary adjoins the existing allotment gardens and the eastern boundary of the wider site area runs along the A143. The western half of the northern boundary adjoins the residential dwellings in Jay's Green and the eastern half adjoins existing agricultural land to the north, beyond Green Lane.

#### The Proposal

- 3.6 Scott Properties has been engaging with Redenhall with Harleston Town Council in respect of the development proposals. The Town Council is not currently pursuing a Neighbourhood Plan and as such it is anticipated that new site allocations will be brought forward through the new Greater Norwich Local Plan process.

- 3.7 An Illustrative Masterplan (Appendix 1) and Phasing Plan (Appendix 2) have been produced to show the nature of the development proposed and how this could be delivered in two phases. Phase 1 would be delivered in the first 5 years, with Phase 2 delivered in years 6 to 10 and 11 to 15. In total the site can deliver up to 350 dwellings over both phases, with a first phase consisting of c. 25 bungalows and c. 60 houses.
- 3.8 The scheme is for a residential led mixed use development with the inclusion of a significant area of open space on the eastern portion of the site. This will create a new development which would round off this eastern edge of the settlement and complement the existing planned growth which has been focused around the south-eastern side of Harleston, providing both housing and employment growth between the town and the existing bypass.
- 3.9 The Illustrative Masterplan shows the field to the north of Briar Farm divided in two, with residential development located adjoining settlement edge and a significant area of open space forming a buffer between the settlement and the A143. The open space would not only provide a recreational area and an opportunity for biodiversity enhancements, but also a buffer between the new development and A143 providing noise mitigation as well. The existing fields to the south of Briar Farm are proposed to be a mix of residential and employment development with the employment land running contiguous with the Fuller Lane Industrial Estate to the west. An area of land along the southern boundary would be safeguarded to allow for an extension to the existing allotment gardens, for which there is currently a waiting list locally.
- 3.10 Previous engagement with the Town Council has identified that there may be an issue with the growth of the football club and associated parking problems. The Town Council is also keen to develop a new community centre. As these discussions progress there may well be an opportunity to consider the relocation of the football ground to the southern or western parts of the Briar Farm site, in lieu of potential employment or recreation space.
- 3.11 The proposed residential development can be developed in phases made up of retirement accommodation which Scott Residential would develop along with family housing and the potential for some serviced self-build plots, subject to demand. It is considered that this approach would help to maximise delivery in line with the recommendations of Independent Review of Build Out, Final Report (Letwin Review) October 2018, delivering a more diverse range of product and thereby facilitating greater market absorption. Scott Residential would be responsible for delivering the early phase along with the associated infrastructure and any section 106 requirements, also securing any necessary utilities upgrades to secure timely delivery.
- 3.12 In respect of the employment/commercial part of the site, while it is noted that market uptake of employment land appears to be slow locally, the proposal could include an element of serviced plots made available on a freehold basis. This maybe more attractive to occupiers allowing some self-build employment units and broadening the type of product available.
- 3.13 The site is immediately available for development, and delivery could be completed within a short-term period. Consequently, the development would make a positive contribution towards maintaining the Council's five year housing land supply.

## Demographic Need

3.14 Experian data has been used to estimate the likely housing need in the area for the type of development proposed. The study area is a 10-minute off-peak drive time of Harleston town centre, meaning that the majority of the Neighbourhood Plan area is included. It should be noted that given the role of Harleston as a local service centre to settlements further afield, a wider study area could also be justified. Within the study area there is a projected increase of 448 people aged 55 and above between 2016 and 2021. The increase in this age bracket accounts for 77% of the total projected population growth within the study area (581), showing that there is likely to be an increasing requirement for housing suited to the needs of older people. The base data in Figure 4 relates to South Norfolk as a whole and the full Experian Demographic Report is provided at Appendix 3.

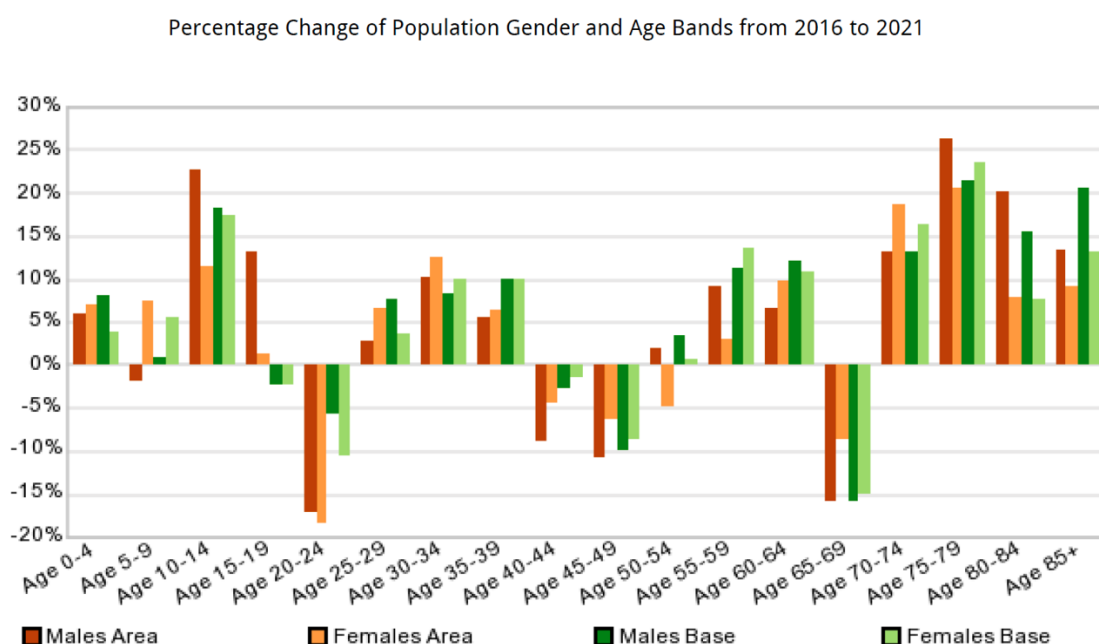


Figure 4: Demographic Data

## Deliverability

3.15 Scott Residential is a family-run housebuilder based in Colchester and is currently building out two sites in North Essex. The company has plans for significant expansion with a number of additional projects are in the pipeline currently, and sees East Suffolk and South Norfolk as an excellent opportunity area for growth given the strong demographic profile and anticipated high demand for the LifeLong Homes product. Scott Properties is currently promoting the subject site and it is the intention that a hybrid planning application would be submitted, with Scott Residential building the bungalow element of the proposals and putting in the services and infrastructure to facilitate the delivery of the rest of the site. Having a serviced site will enable smaller regional housebuilders to bid on the family housing element of the first phase (and subsequent phases), increasing opportunities for smaller and medium sized housebuilders and boosting overall housing delivery in the area.

3.16 LifeLong Homes by Scott Residential is a specialist form of housing designed to meet the needs and aspirations of people aged 55 and over looking to move to a single storey property

which is highly adaptable to changing needs. The properties contain a suite of design features to allow people to live independently for as long as possible, including but not limited to level thresholds throughout, ergonomic fixtures and fittings, and the optional installation of a wet room and activation of a care call facility. The Gainsford Gardens marketing brochure is provided at Appendix 4 as an example of the type of properties that are proposed.

### 4 HELAA Assessment

4.1 The figure below identifies the sites which were put forward as part of the December 2017 and October 2018 HELAA assessment.

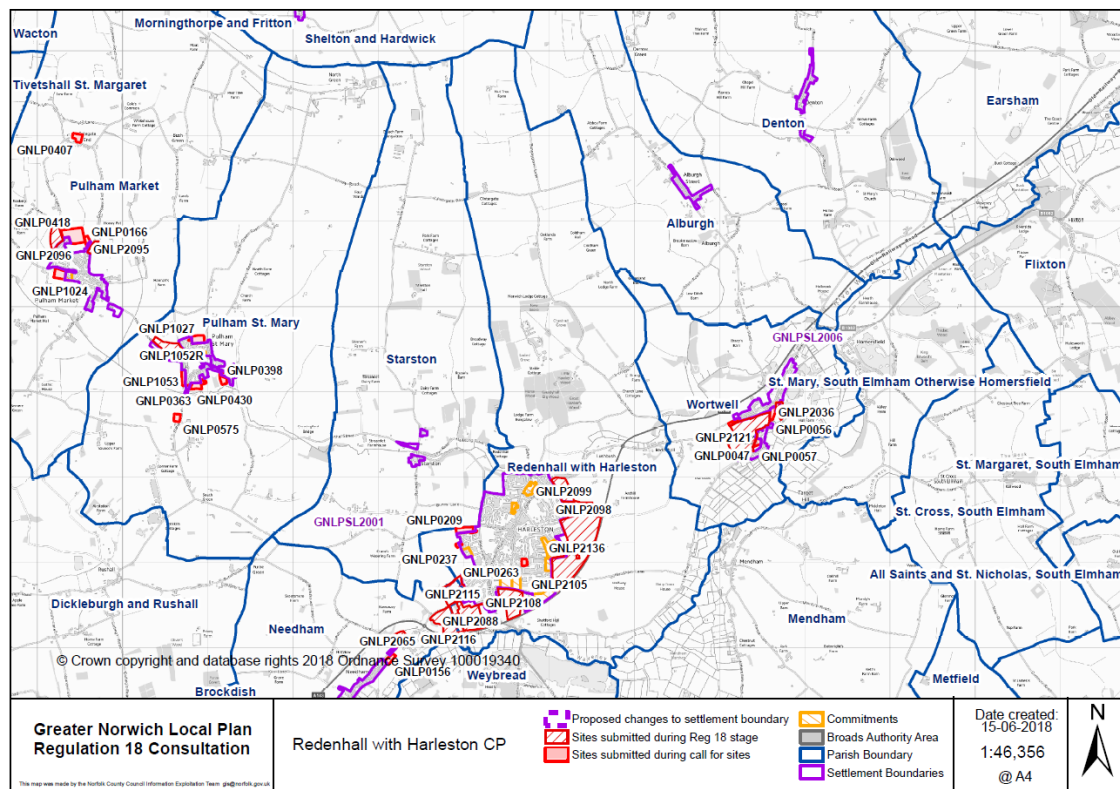


Figure 5: HELAA Site Submissions

4.2 For Harleston it is clear that the majority of sites are focused around the south eastern side of the town seeking infill between the existing settlement edge and the A143 corridor, which forms an established and defensive barrier for the growth of the settlement. Site GNL2136 at Briar Farm, sits in the most obvious location for the next extension to the settlement. It forms a natural continuation of the existing development boundary which already extends as far as the A143 in the south and loops round to connect to settlement edge along the north east of Jay’s Green creating a natural infill and completing the settlement edge. The remaining area of land between the proposed development and the A143 will be brought forward as a new area of public open space, to serve both the new development and existing community enhancing the landscape setting of settlement.

4.3 For comparison purposes the tables below show all the sites, including the 2017 HEELA sites. From this it can be seen that the Briar Farm site overall scores as well as any other site and better than most.

### Constraints Analysis – 2017

	Criteria						
	Access	Accessibility to Services	Utilities Capacity	Utilities Infrastructure	Contamination and Ground Stability	Flood Risk	Market Attractiveness
Land south of Rushall Road, Harleston (GNLP0209)	Yellow	Green	Yellow	Green	Green	Yellow	Green
Land adjacent to 10 Frere Road, Harleston (GNLP0237)	Yellow	Green	Yellow	Green	Green	Yellow	Green
Apollo Club, Mendham Lane (GNLP0263)	Yellow	Green	Yellow	Green	Yellow	Green	Green

### Constraints Analysis – 2018

	Criteria						
	Access	Accessibility to Services	Utilities Capacity	Utilities Infrastructure	Contamination and Ground Stability	Flood Risk	Market Attractiveness
West of Shotford Road (GNLP2088)	Yellow	Green	Yellow	Green	Green	Yellow	Yellow
North of Green Lane (GNLP2098)	Green	Green	Yellow	Green	Green	Yellow	Yellow
South of Redenhall Road (GNLP2099)	Yellow	Green	Yellow	Green	Green	Yellow	Yellow
Mendham Lane (GNLP2105)	Yellow	Green	Yellow	Green	Green	Yellow	Yellow
South of Spirketts Lane (GNLP2108)	Yellow	Green	Yellow	Green	Green	Yellow	Yellow
South of Needham Road (GNLP2116)	Yellow	Green	Yellow	Green	Green	Yellow	Yellow
<b>Land at Briar Farm (GNLP2136)</b>	Green	Green	Yellow	Green	Green	Yellow	Yellow

4.4 More detail on individual analysis criteria is set out below. If these comments are accepted in particular in respect of Flood Risk and Market Attractiveness, it is considered that that the site will be one of most like proposals to be taking forward through the next round of site assessment.



### Impacts Analysis – 2017

	Criteria						
	Significant Landscapes	Townscapes	Biodiversity and Geodiversity	Historic Environment	Open Space and GI	Transport and Roads	Compatibility with Neighbouring Uses
Land south of Rushall Road, Harleston (GNLP0209)	Yellow	Yellow	Yellow	Yellow	Green	Yellow	Green
Land adj. to 10 Frere Road, Harleston (GNLP0237)	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Green
Apollo Club, Mendham Lane (GNLP0263)	Green	Green	Yellow	Yellow	Green	Yellow	Green

### Impacts Analysis – 2018

	Criteria						
	Significant Landscapes	Townscapes	Biodiversity and Geodiversity	Historic Environment	Open Space and GI	Transport and Roads	Compatibility with Neighbouring Uses
West of Shotford Road (GNLP2088)	Yellow	Yellow	Yellow	Green	Green	Green	Green
North of Green Lane (GNLP2098)	Yellow	Yellow	Yellow	Green	Green	Green	Green
South of Redenhall Rd (GNLP2099)	Yellow	Yellow	Yellow	Yellow	Green	Green	Yellow
Mendham Lane (GNLP2105)	Yellow	Yellow	Yellow	Green	Green	Green	Green
South of Spirketts Lane (GNLP2108)	Yellow	Yellow	Yellow	Green	Green	Green	Green
South of Needham Rd (GNLP2116)	Yellow	Yellow	Yellow	Green	Green	Green	Green
<b>Land at Briar Farm (GNLP2136)</b>	Yellow	Green	Yellow	Yellow	Green	Green	Green

- 4.5 Again in respect of impact analysis, the site scores as well as any other overall. As set out below it is considered that it definitely should score green for significant landscape and historic environment, and should also be green for biodiversity and geodiversity given the significant opportunities for biodiversity enhancements which it could deliver.

### Site Specific Assessment

- 4.6 The October 2018 Site Specific Assessment for site GNLP2136 is set out on Page 297 of the report and is reproduced below in extract form. A commentary on each section of the assessment has been provided after each extract. The conclusion of the assessment of was that the site was considered to be suitable. However, it is considered that after further review, given the additional information and evidence accompanying this consolation, that some of the Amber scores should be amended to Green.

## Parish: Harleston Suitability Assessment

**Site reference:** GNLP2136

**Site area (Ha):** 27.04

**LOCATION:** Briar Farm

**PROPOSED DEVELOPMENT:**  
Residential-led mixed development (350 dwellings including accessible dwellings, care, employment, retail)

**District:** South Norfolk

- 4.7 It should be noted that the site area should be significantly reduced from the 27.04 hectares to 12.24 hectares to reflect the extent of the developable site. For the purposes of this HELAA Assessment, which seeks to identify land suitable for residential, employment and commercial development only, a reduced site area should be included to reflect the fact that it is only the western side of the site that will be developed for residential and employment use. While at the planning application stage of development the entirety of the site would be included, this would be necessary to secure the future management and delivery of the extensive public open space and additional allotment land.

### Constraints Analysis

#### CONSTRAINTS ANALYSIS

Access	Green
Accessibility to Services	Green
Utilities Capacity	Amber
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Amber
Market Attractiveness	Amber

### Access

- 4.8 Access has been scored Green. Initial technical work has demonstrated that new vehicular access points can be provided from the adjoining highway network at Mendham Lane and Jay's Green. Further pedestrian / cycle access will also be provided in the same location, and also to the recent residential development at Harvest Way, and the existing Angles Way Long Distance Footpath will be safeguarded and enhanced. A new footpath connection is

proposed to the existing public footpath to the north of the site, creating a new link through the proposed open space to Angles Way.

- 4.9 Suitable access is available for both the construction and occupation phases of the development, without any constraints. Accordingly, it is confirmed that site assessment is correctly scored as **Green**.

#### **Accessibility to Services**

- 4.10 This has scored a Green rating which reflects the sustainable location of the site to the east of Harleston Town Centre, and the extensive range of services and facilities which it offers, all within reasonable walking or cycling distance of the site. It is noted that all the other sites assessed in Harleston also scored Green for accessibility to services, while these assessments maybe technically correct, some are considered to be more remote and as such less likely to encourage potential future occupiers to walk or cycle.
- 4.11 The accompanying transport note quantifies the sites proximity to local services and facilities as well as public transport, which confirms its correct assessment, as **Green**.

#### **Utilities Capacity**

- 4.12 The site has been scored an Amber for Utilities Capacity as have all other sites. However, the accompanying Utilities Overview Note provided at Appendix 5 demonstrates that there is currently sufficient capacity to accommodate the scale of development proposed without and significant requirement for upgrades. It is therefore considered that the assessment should be amended from Amber to **Green**.

#### **Utilities Infrastructure**

- 4.13 In accordance with the assessment methodology, there is no strategic utilities infrastructure crossing the site and the **Green** assessment score is therefore considered to be correct.

#### **Contamination and Ground Stability**

- 4.14 Given the historic use of the site as arable farm land, it is concluded that it is extremely unlikely that there would be any contamination. As such, the sites **Green** assessment score is considered correct.

#### **Flood Risk**

- 4.15 The site is entirely within Flood Zone 1 according to the Environment Agency's Flood Maps for planning, and therefore at low risk of flooding. The assessment has scored the site as Amber, however, the assessment was based on the wider site area and not the more focused development site which is actually now being promoted. The Environment Agency's Map for Flood Risk for Surface Water, confirms that high, medium and low surface water flood risk areas are present on the land to east of the site. However, these do not encroach to any significant degree into the development area. As referred to in the accompanying Flooding Risk Assessment Summary Note provided at Appendix 6, the surface water can be accommodated in the design of the open space to the east of the site as part of the development proposals at the planning stage.

4.16 It is concluded that now the site area for the actual proposed development has been reduced, in accordance with the assessment methodology the entire site is at low risk of flooding and within Flood Zone 1. It is also noted that other sites in the assessment with small amounts of low surface water risk have been scored as Green. Accordingly, it is considered that the score should be amended from Amber to **Green**.

### Market Attractiveness

4.17 The site has been scored Amber for Market Attractiveness. The demographic research which has been undertaken has confirmed that there would be demonstrable local demand for the proposed mix of residential development including an element of retirement units, in this attractive and sustainable location. Scott Residential is a new housebuilder to the area and is keen to begin delivering as soon as possible. Accordingly, it is concluded that the assessment score should be amended from Amber to **Green**.

### Impact Analysis

#### IMPACTS ANALYSIS

Significant Landscapes	Amber
Townscapes	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Green
Compatibility with Neighbouring Uses	Green

### Significant Landscapes

4.18 Looking at Figure 5 above, it is clear that the majority of proposals are focused on the south-eastern side of Harleston. The majority of the sites will be extensions to the existing settlement and all the sites have been scored Amber in respect of their landscape impact.

4.19 The assessment methodology identifies Amber sites as those which would have a detrimental impact on sensitive or other landscapes which could be mitigated. To be scored Green, a site is required to have either a neutral or positive impact, but importantly not to have a detrimental impact. This consultation response is supported by a Landscape Summary Note (Appendix 7), a Landscape Design Strategy (Appendix 8) and a Landscape Viewpoints Location Map (Appendix 9). In landscape terms the assessment site area has been substantially reduced from that originally assessed, so that the significant area of public open space between the proposed development and the A143 to the east is not included. The development proposals therefore form a natural extension of the settlement edge from the existing residential development at Jay's Green to the north looping round the existing built development of Briar Farm and linking in to the existing allotment gardens to the south. South-west of the allotment gardens the settlement boundary already extends to the A143 to include employment allocation site HAR 7. The proposed development is considered to represent a logical infill to the existing edge of the settlement which will be reinforced by the proposed adjoining open space, which rather than intruding into the landscape will provide a natural completion of the settlement edge with enhanced landscape setting.

- 4.20 The Landscape Summary Note (Appendix 7) deals with the wider site including the area of public open space but is still clearly relevant to this assessment. It identifies that the site is strongly characterised by its arable land use with generally flat open fields, with a gradual rise in topography towards the east. It also notes that the strong presence of the existing settlement edge of Harleston is also a characterising feature of the site, particularly within the western section. It is this western section which should be the focus of the landscape impact for the purposes of the HELAA Assessment. It is considered that the existing immediate landscape character adjacent to the eastern edge of the existing settlement is unremarkable and relatively contained in long views by the boundary of the A143 road corridor. It is not subject to any national or local designation which warrant it being considered a sensitive landscape. Furthermore, it is not considered to be comparable with the majority of the other sites which have been put forward which project into the open countryside more dramatically, to the north-east and south-east of the settlement. It is concluded that development of the site would have a neutral impact and potentially when developed, with the area of open space to the west providing a significant buffer and enhanced landscape setting for the settlement, will actually deliver a positive impact.
- 4.21 A Preliminary Arboricultural Survey is included as one of the supporting documents at Appendix 10 which identifies a total of 41 trees and 29 groups of trees within the wider site. There are 23 trees classed as Category A. There are 9 trees and 10 groups of trees classified as Category B. The remaining trees and groups were Category C and no trees were categorised as Category U trees. The trees are located around the margins of the development parcels, so it will be possible to retain them and supplement them with additional planting to enhance the landscape setting of the development. The ability to retain all of the important trees as landscape features should be viewed as a further positive impact, along with the enhancement through additional planting.
- 4.22 Accordingly, it is not considered that the development site would have any detrimental impact in landscape terms and overall will have a positive impact. As such the assessment scoring should be amended from Amber to **Green**.

### **Townscapes**

- 4.23 Under the assessment criteria for townscapes, sensitive townscapes are identified as those adjacent to national parks, the Broads and Areas of Outstanding Natural Beauty, including conservation areas. Other considerations include the potential loss of protected trees. This site does not have any impact on any of these particular designations or townscape considerations. The townscape in this part of the settlement is made up of existing residential areas with limited frontage development onto the site, development sites and the Fuller Road Industrial Area. In townscape terms, this results in a fragmented and incoherent edge to the existing settlement. It is considered that the site would provide an opportunity to enhance the townscape of the eastern side of the settlement and deliver a positive impact. Overall the inclusion of an open space buffer would complement the settlement edge and provide a defensible boundary between the settlement and the A143.
- 4.24 It is therefore concluded that the scoring of the site as **Green** is correct and reflects the positive townscape impact that the development could deliver.

### **Biodiversity and Geodiversity**

- 4.25 The site is not subject to any national, international, regional or local protection. A Preliminary Ecological Appraisal has been included as part of the accompanying documents at Appendix 11 however, it should be noted that this has assessed the wider site and is not solely focused on the smaller appraisal site. The appraisal has identified that the site contains suitable habitat for roosting bats, foraging bats, Great Crested Newts, birds and reptiles. The majority of these habitats are related to the existing field boundaries, the pond, grassland and farm buildings, all of which would be retained as part of any development proposals. The majority of the remainder of the site is made up of arable fields which are intensively farmed as such reducing their habitat potential and wider biodiversity. Development of the site would deliver a significant new area of open space to the east along with extensive additional planting and habitat enhancement. It is therefore considered that development of the site would not have a detrimental impact on any designated site, protected species or ecological network but would actually result in a positive impact on biodiversity. Accordingly, the assessment should be amended from Amber to **Green**.

### **Historic Environment**

- 4.26 The site has been scored Amber for Historic Environment. The methodology suggests that an Amber score is appropriate where development of the site could have a detrimental impact on designated or non-designated heritage assets or the setting of designated or non-designated heritage assets, but impact could be reasonably mitigated. It is noted that the majority of the other sites which have been put forward around the settlement have been scored Green for historic environment and it is unclear why this site has been scored as Amber, other than it has been identified to be within 400 meters of the Conservation Area. The north-western corner of the site is approximately 300 meters from the eastern extremity of the Conservation Area, however, the majority of the site is significantly further away. The entire site has no relationship with the Conservation Area due to the intervening more recent development of the eastern side of the town. It is clear that development of the site would not have a detrimental impact on any designated or non-designated heritage assets and accordingly this site assessment should be amended from Amber to **Green**.

### **Open Space and Green Infrastructure (GI)**

- 4.27 The site has been scored Green for Open space and Green Infrastructure. The assessment methodology indicates that a Green score is permitted where development on site would not result in the loss of any open space. This proposal will in fact result in the creation of significant new areas of open space, both formal and informal. This should be viewed as a positive benefit of the development and accordingly the **Green** score is considered correct.

### **Transport and Roads**

- 4.28 The site assessment has concluded that the proposals will not have a detrimental impact on the functioning of trunk roads and/or local roads. Further technical work is currently being undertaken to confirm that the level of traffic likely to be generated by the proposed development will not be significant and there is sufficient capacity in the local highway network to accommodate the proposals. Accordingly the **Green** score is considered correct.

## Compatibility with Neighbouring Uses

- 4.29 The site has been scored Green for compatibility with neighbouring uses. The layout and character of development proposed would not have any significant impact on the community given the separation distances from existing development and intervening landscape which will be included. There would not be any adverse impacts through overlooking, overbearing or overshadowing of surrounding development given the proposed layout, scale of development and separation distances available. Furthermore, the development will include significant areas of open space which will not only be available to the new residents but also to existing residents. The layout has ensured that the proposed residential areas will have regard to the outlook and adjoining residential uses and as such are considered complementary. The area identified for employment land is located to the south of the site next to the existing industrial area. The scale and form of buildings on the site can be arranged to respect the adjoining scale of existing buildings, for example, the bungalows are located to relate to the existing bungalow development at Jay's Green.
- 4.30 Accordingly, it has to be concluded that the site is correctly scored as **Green** for this impact.

### SITE SUITABILITY CONCLUSIONS

This large site (27ha) lies entirely within the river valley, west of the A143, with potential access from Mendham Lane, Jays Green or existing housing development to the east of the town. Initial evidence would suggest that the Highway Authority would support the site. Being well-related to the built form, it has access to bus services, employment, GP, retail, primary and secondary schools. There is a line of surface water flood risk within the site, which could be avoided. The conservation area within 400m is unlikely to be affected by the site's development. Any development in Harleston may impact on Gawdyhall Big Wood to the north of the town which may require mitigation, and there are ponds on and adjacent to the site which may require ecological surveys. Sewerage, surface water and water supply network enhancements would all be necessary; mitigation of surface water drainage would be particularly important. There are no constraints regarding contaminated land and there would be no loss of publicly accessible open space. Although the site has some constraints, it is considered suitable for the land availability assessment.

**For the purposes of the HELAA capacity assessment this site is considered to be: Suitable**

- 4.31 In respect of the above suitability conclusion this will need to be amended to reflect the revised site size and that the line of surface water will now be beyond the site within the proposed open space which will adjoin the site. In respect of the proximity of the conservation area it is suggested that this should be qualified to say that in addition a large proportion of the site is significantly over 400m away. In respect of ecology reference should be made to the preliminary ecological survey which has been undertaken and confirms the acceptability of development subject to its recommendations, it does not identify there to be any impact on Gawdyhall Big Wood or mitigation necessary.

## Parish: Harleston Availability and Achievability Assessment

### Availability and Achievability Conclusions

The proposer has indicated that the site is likely to be AVAILABLE in the following timescale:	Within 1-5 years (by March 2021)	(timescales have not been specified by the proposer if these fields left blank)
The proposer has indicated that the site is likely to be DEVELOPABLE in the following timescale:	Within 1-5 years (by March 2021)	

In terms of site viability, this site has been submitted by a landowner/promoter as viable for the form of development proposed and is assumed to be developable within the plan period in accordance with the timescales above (where given). Further area-wide work on viability typologies will be done as plan-making progresses and will inform decisions on viability.

### Overall Conclusions for Site GNLP2136

Based on the site suitability analysis it is considered that this site is appropriate for the land availability assessment, subject to any caveats in the Suitability Conclusions.

### Availability and Viability

- 4.32 The site is immediately available for development, and there are no legal or viability issues which would inhibit early delivery.

### Deliverability

- 4.33 Phase 1 as shown on the Phasing Plan could deliver c. 25 bungalows and c. 60 houses from two sales outlets. Based on Scott Residential's usual build-out and sales rate of 26 dwellings per annum per site, and an anticipated family housing delivery rate of 30 dwellings per annum, the first phase could be delivered in its entirety within three years of planning permission being granted. The timings around the employment land are less clear at the moment and will be dependent upon further market research and a policy steer in terms of the amount of additional employment land sought in Harleston. Phase 2 consists of c. 70 bungalows and c. 200 houses.



## 5. CONCLUSIONS

- 5.1 These representations have been prepared by Strutt and Parker LLP on behalf of Scott Properties, in relation to the site at Briar Farm, Harleston, site reference GNLP2136. The 2018 HELAA Assessment has considered the site to be suitable for a residential led mixed use development.
- 5.2 As set out above it is considered that the constraints analysis for Utilities Capacity, Flood Risk and Market Attractiveness should be rescored from Amber to Green. The site is in Flood Zone 1 and at low risk of flooding, the surface water risk being beyond the site in the adjoining open space, and it has been demonstrated that sufficient utilities capacity can be achieved to enable the site to come forward. Market analysis and demographic information has confirmed the anticipated demand and financial viability of the project.
- 5.3 In respect of the impact analysis this should also be amended to show scores of Green for Significant Landscapes, Biodiversity and Geodiversity and Historic Environment. The site represents a natural infill which will not harm the landscape setting of the town. Furthermore, it is remote from the conservation area and will not have a detrimental impact on any designated or non-designated heritage assets. All the existing trees and other habitat features will be retained on site and the extensive new area of open space will provide significant opportunities for biodiversity enhancements to be delivered.
- 5.4 Harleston is an attractive market town and employment centre serving a relatively local catchment. It is one of four Main Towns currently identified in the Development Plan as suitable to accommodate additional housing growth and would be a logical, sustainable location for the allocation of additional housing growth to serve the southern rural area, beyond the Norwich Policy Area in the new Greater Norwich Local Plan.
- 5.5 The proposed residential development can be developed in phases made up of retirement accommodation which Scott Residential would develop, along with family housing and the potential for some serviced self-build plots. It is considered that this approach would help to maximise delivery in line with the recommendations of Letwin Review (2018), delivering a more diverse range of product, thereby facilitating greater market absorption. The site would also deliver employment space, an extension to the allotment gardens and a significant area of open space.
- 5.6 The site sits in the most obvious location for the next extension to the settlement of Harleston. It forms a natural continuation of the existing development boundary, which already extends as far as the A143 in the south and loops round to connect to settlement edge along the north east of Jay's Green, creating a natural infill and completing the settlement edge. The remaining area of land between the proposed development and the A143 will be brought forward as a new area of public open space, to serve both the new development and existing community enhancing the landscape setting of settlement. The inclusion of this open space also represents a significant opportunity for biodiversity enhancement.
- 5.7 The proposals for the site are considered to be in line with the NPPF's presumption in favour of sustainable development and will provide significant economic, social and environmental benefits. The sites identification as "suitable" is supported and it is considered that the detailed site analysis should be amended as set out above.

- 5.8 In summary, we feel that the site represents a highly sustainable and deliverable opportunity to bring forward a high quality development that will address an identified local need and deliver tangible community benefits early in the plan period. It is the intention that pre-application advice will be sought from Officers at South Norfolk District Council early in 2019, and additional consultation will be conducted with Redenhall with Harleston Town Council and other local stakeholders to further shape the proposals in advance of a hybrid planning application being submitted.