

**Our Ref: 302680/CH/AW**

Sent by email to: [GNLP@norfolk.gov.uk](mailto:GNLP@norfolk.gov.uk)

13<sup>th</sup> December 2018

Dear Greater Norwich Planning Policy Team,

## **Greater Norwich Joint Local Plan – Regulation 18 Consultation**

**Site: Land East of Norwich Road & Land East of Norwich Road, Dickleburgh**

**Site Reference: GNLP2083 & GNLP2084**

I write further to the current Regulation 18 consultation with respect to the Joint Local Plan and in particular to the above sites. We hereby submit comments with respect to the above site reference GNLP2083 and site reference GNLP2084 both located to the east of Norwich Road in Dickleburgh and in response to the Site Proposals Document Addendum New, Revised and Small Sites document and Housing and Economic Land Availability Assessment (HELAA).

On behalf of our client we welcome and support the Council's decision and consideration that the sites represent a suitable sites and options for future residential development as identified within the HELAA and Site Proposals Document Addendum for New, Revised and Small Sites. To supplement this though and address some of the points raised in the site appraisal we would wish to make the following comments.

### **1. GNLP2083 – Land East of Norwich Road, Dickleburgh**

#### **Suitability**

We would reiterate that the site is suitable for residential development being located with reasonable access to services and facilities within Dickleburgh which is a service village and should be allocated for growth in the emerging plan. As the Council note and we would highlight none of the potential impacts or constraints cannot be overcome or mitigated against.

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We contend that the comments made in the HELAA and Site Proposals Addendum that there are townscape implications with respect to the elongation of the village are ill-considered and not justified. The linear settlement form of many villages within the rural parts of South Norfolk and wider region are characteristic of the small scale and relatively slow organic growth that these villages have seen through the 19<sup>th</sup> and 20<sup>th</sup> centuries. Individual and small developments have stuck close to and along the highway edges and incrementally create an elongated form rather than rapid development which often results in substantial blocks of development. Both of which are observed in Dickleburgh. This slower scale growth inevitably results in a ribbon or elongated pattern of development. Indeed such built form is actually in keeping with the character and appearance of the rural area and countryside within South Norfolk, and depending on a sites immediate context is arguably more sensitive and responsive to the traditional village and settlement forms seen in rural South Norfolk.

Furthermore, we would highlight that the settlement of Dickleburgh already has an elongated form that extends north to south along the Norwich Road and east to west along the Harleston Road. The site sits opposite a significant row of dwellings on the west side of Norwich Road with dwellings continuing sporadically on the eastern side of Norwich Road to the north of the site. Indeed this site only provides for the consolidation of the existing settlement form along the primary north – south axis of the village, as it does not extend further north than the existing dwellings along Norwich Road; and importantly reduces the reliance on trips made on secondary roads to the east and west of the village such as Harvey Lane and Burston Road. It is therefore unclear what harm would be caused by development of this site from a townscape perspective.

We note that a small part of the site is at risk of surface water flooding as identified on the Environment Agency Flood Risk Maps. As the Council notes the site is of sufficient size with flexibility in the numbers of dwellings to be provided on the site to allow for the dwellings to be located to avoid this area. Otherwise, there is nothing to indicate that a standard approach to landscaping and SUDS techniques would not be able to mitigate for any potential impacts of site and minimise risk on and off site. Therefore, this would not be a constraint on development.

The fundamental considerations and impacts relating to transport and access, flood risk, landscape, biodiversity, heritage and implications can all be mitigated for and made acceptable. We also contend that this is a very realistic and attractive site to come forward being located in a semi-rural location, on the edge of the existing village, within walking distance and connected by a continuous footpath to the various facilities in the village including a school, playing fields, village shop. Therefore, the site represents a very suitable site for development to be included in the emerging plan.

### **Availability**

We also take the opportunity to reiterate that the site is available and owned by our client and there are no known legal restrictions to bringing the site forward in the short term and indeed that would prevent an immediate delivery of new homes.

### **Achievability**

We would highlight that the site is available now in freehold ownership of our client and there are no technical, legal, or viability constraints that would not prevent it from being developed within years 1 - 5.

## **2. GNLP2084 – Land East of Norwich Road, Dickleburgh**

### **Suitability**

We would reiterate that there are no potential impacts or constraints discussed within the suitability analysis cannot be suitably addressed, and therefore the site is suitable for residential development. The site is relatively small but nonetheless can contribute in a sensitive manner to the growth necessary in Dickleburgh. The footpath running in front of the site provides a continuous connection to the centre of the village and various facilities within the village which are all within walking distance.

We note that reference is made in the HELAA and Site Proposals Addendum to the potential elongation of the village resulting from development on this site also. Whilst not repeating our arguments above, we would reiterate that we do not consider there is harm to the townscape from a linear or elongated built form. This is a distinct character of village townscapes within Norfolk and the region. We also highlight that the settlement of Dickleburgh already has an elongated form that extends north to south along the Norwich Road and east to west along the Harleston Road. The built form of dwellings continues to the north of the site on both sides of Norwich Road. Indeed this site would only provide for the consolidation of the existing settlement form along the primary north – south axis of the village, as it does not extend further north than the existing dwellings along Norwich Road. Development at the site would also help reduce the reliance on trips made on secondary roads to the east and west of the village such as Harvey Lane and Burston Road.

The other considerations relating to flood risk, landscape, biodiversity; heritage, and utilities can all be mitigated for through the application and development process. None of these considerations are a constraint on development. Therefore, the site represents a very suitable site for development to be included in the emerging plan.

### **Availability**

We also take the opportunity to reiterate that the site is available and owned by our client and there are no known legal restrictions to bringing the site forward in the short term and indeed that would prevent an immediate delivery of new homes.

### **Achievability**

We would highlight that the site is available now in freehold ownership of our client and there are no technical, legal, or viability constraints that would not prevent it from being developed within years 1 - 5. This is considered realistic for a site which is attractive being located on the edge of an existing village and within close proximity to local amenities including schools, shop and public houses. Indeed this provides for more than adequate flexibility in providing for any necessary improvements to the capacity of any utility infrastructure to serve the development.

## **Summary**

With respect to both site references GNLP2083 and GNLP2084, the applicant welcomes the Council's comments that the sites represent suitable sites for future residential development within the village of Dickleburgh. We would stress that there are no fundamental constraints or impacts that cannot be mitigated through the subsequent application and development process. The sites represent an opportunity to provide much needed housing at a proportionate scale and within a location that would support the nearby facilities within the village whilst also minimising wider landscape and townscape impacts. We would therefore welcome your support for the inclusion of the above site in the emerging joint local plan.

Do please feel free to contact me should you have any queries regarding the above.

Yours sincerely

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