

Our Ref: 402997/CH/AW

Sent by email to: GNLP@norfolk.gov.uk

14th December 2018

Dear Greater Norwich Planning Policy Team,

Greater Norwich Joint Local Plan – Regulation 18 Consultation

Site: Land West of Shotford Road, Harleston

Site Reference: GNLP2088

I write further to the current Regulation 18 consultation with respect to the Joint Local Plan and in particular to the above site. We hereby submit comments with respect to the above site reference, GNLP2088 for Land West of Shotford Road, Harleston 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 site represents a suitable site and option 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.

GNLP2088 – Land West of Shotford Road, Harleston

Suitability

The site has been submitted for residential development and in this regard we contend the site is very suitable to address the future growth needs of the town of Harleston being well related and located adjacent to the settlement boundary of Harleston. The site forms a logical infill allocation

between the existing residential development to the north and west and the A143 to the south and therefore would have no significant landscape or townscape implications.

The site relates well to the built form of Harleston and is within close proximity to the town centre and all the facilities and amenities in the town which provide all necessary day to day needs for future households. Harleston being a Market Town with all the facilities needed for occupants needs and acting as a focus for the rural hinterland both in Norfolk and to the south along the Waveney Valley, together with its easy access on to the A143 make it a sensible and reasonable location for significant growth in the emerging plan.

We would also highlight that none of the potential impacts or constraints identified in the HELAA cannot be overcome or mitigated against. In particular we note that the initial conclusions within the HELAA suitability analysis and comments of the Highway Authority highlight suitable access can be achieved either to the north off Needham Road or to the east off Shotford Road.

The HELAA analysis highlights potential constraints include a small part of the site that is at risk of surface water flooding as identified on the Environment Agency Flood Risk Maps. However, these areas are not significant and the site is of sufficient size for the dwellings to be located outside of any areas at risk and to also provide any necessary attenuation to avoid increasing risk elsewhere. 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 HELAA analysis identifies that development of the site would lead to the loss of some Grade 2 Agricultural Land. However, we note that the surrounding district and region have an abundance of high quality agricultural land. This does not relate to the whole site and the resultant scale of loss would not be of sufficient scale to warrant consultation with Natural England on this point and would not lead to the strategic implications on the availability of agricultural land. Therefore, this would not be a constraint on development.

The potential impacts on wildlife and biodiversity are not significant and can be suitably surveyed and mitigated through the policy and application process. With respect to the provision of sewerage and main water supply there is nothing at this stage that would indicate that these cannot be provided for by improvements to existing infrastructure.

The fundamental considerations and impacts relating to transport and access, flood risk, landscape, biodiversity, heritage and townscape implications can all be mitigated for and made acceptable. We would also highlight that this is a very realistic and attractive site to come forward being located on the edge of the town within walking distance to the various facilities in the town including a schools, playing fields, shops, bus services and employment facilities. 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

In this regard 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 settlement and within close proximity to local amenities within the town including schools, various shops, employment opportunities and recreational facilities. Indeed this provides for more than adequate flexibility in providing for any necessary improvements to the capacity of any necessary infrastructure to serve the development.

Summary

With respect to site reference GNLP2088 the applicant welcomes the Council's conclusions that the site represents a suitable site for future residential development and provide for the natural expansion of Harleston. We highlight that there are no fundamental constraints or impacts that cannot be mitigated through the subsequent policy allocation, applications and development process

We would stress that the proposals put forward in contrast to recent speculative applications and individual piecemeal development within the District represent an opportunity to help deliver a planned future for Harleston and wider local community. One that addresses the specific existing and future needs of the District and the local community in a sustainable and accessible location and at the same time seeks to minimise the environmental impacts of future development. 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

Christopher Hobson BSc (Hons) MSc MA MRTPI

Principal Planner

Building Consultancy Department

Diss Office

Email: chris.hobson@durrants.com

Administration: 01379 646603

www.durrantsbuildingconsultancy.com