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By email only

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Dear Sir/Madam,

**RE: GREATER NORWICH LOCAL PLAN CONSULTATION – LAND SOUTH OF HARVEY LANE, DICKLEBURGH**

We write to respond to the public consultation on the Greater Norwich Local Plan, on behalf of our clients, the Webster family, who own land south of Harvey Lane, Dickleburgh. The land is being promoted for development of approximately 20 - 25 new homes through the South Norfolk Village Clusters and Housing Sites Allocation Plan.

We welcome the opportunity to respond to the consultation on the Greater Norwich Local Plan, although it is disappointing that sites in village clusters in South Norfolk are not allocated in the Greater Norwich Local Plan, and that there is a further delay before the draft South Norfolk Village Clusters Housing Sites Allocations Plan will be published for consultation.

This brief response to the consultation relates to the proposed spatial strategy for development, and to the assessment of the site contained in the 2017 Housing and Economic Land Availability Assessment. A further response will be submitted to the consultation on the forthcoming South Norfolk Sites document.

### **Policy 1 – The Sustainable Growth Strategy**

Q13 – Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?

Table 6 sets out the details of Establishing the Plan's total housing figure. It notes that 7,840 new homes will be provided on sites proposed to be allocated through the GNLP (6,640) and sites for 1,200 new homes will be identified in the South Norfolk Village Clusters Housing Sites Allocation Plan.

Paragraph 162 of the Plan identifies that a contingency site in Costessey could deliver around 1,000 homes and that further sites could be allocated in Wymondham should this prove to be required due



to low delivery of allocated housing sites. We suggest that this approach does not comply with the guidance in the NPPF which states in paragraph 23 that:

*'Strategic policies should provide a clear strategy for bringing sufficient land forward... This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.'*

If there is concern that the Plan's focus on large sites could result in delays to delivery of housing, this should be addressed at the Plan making stage by the allocation of further, smaller sites in the villages; these smaller sites are likely to be more deliverable and such a strategy would provide a greater degree of certainty of delivery.

#### Q14 – Do you support, object or wish to comment on the approach for housing numbers and delivery?

Table 7 sets out the proposed Housing Growth 2018 – 2038. It notes that the Norwich urban area will see a 29% increase in housing growth, but the village clusters will only experience a 9% increase.

Paragraph 168 of the Plan notes that; *'a significant proportion of the allocated sites are strategic scale commitments of 1,000 homes plus'*, This reliance on large sites to deliver new homes could result in delays to the delivery of those homes because of the need for significant infrastructure provision to be delivered before the homes can be built and occupied.

Paragraph 164.6 of the Plan notes that 12% of the homes allocated through the Plan are on sites of no larger than 1 hectare and that this complies with paragraph 64 of the NPPF which requires that at least 10% of sites are no larger than 1 hectare. However, we propose that significantly more growth should be distributed to smaller sites in this Plan, to off-set the inevitable delays associated with large scale strategic growth, which forms the majority of the proposed new homes in the Plan.

Distributing a greater proportion of the proposed new homes to smaller sites in and adjacent to the villages will improve the flexibility of the Plan to respond to changing circumstances, and will help to ensure a steady delivery of homes to contribute to the five year housing land supply and throughout the plan period.

#### **Policy 7.4 – Village Clusters**

#### Question 45: Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.

Paragraph 341 states that village clusters are based on primary school catchments, which provide a proxy for social sustainability. It is accepted that primary school catchments can provide one measure of social sustainability. However, to base the housing allocation for each village solely on a single criterion such as the primary school catchments is, we believe, very limiting. The ability of a primary school to accept children from new developments can only ever provide a snapshot in time of an ever-changing situation. The amount of housing allocated on the basis of this criterion alone also only reflects the existing provision and does not take account of the potential of new housing to fund



growth and improvements to the schools, or to any other community facilities, and therefore, potentially stymies future growth and could contribute to a cycle of stagnation or decline.

Paragraph 83 of the NPPF states that:

*'Planning policies should enable .... The retention and development (my underlining) of accessible local services and community facilities, such as local shops, meeting places, sports venues, open spaces, cultural buildings, public houses and places of worship.'*

We propose that the amount of housing allocated to village clusters is based on a much wider range of criteria, including the existence and absence of community facilities and services, such as a village shop, broadband connection, public house, post office, provision of public transport services, and consideration of the role the village plays in serving other smaller settlements.

We note that paragraph 343 of the Plan states that:

*'A separate South Norfolk Village Clusters Housing Site Allocations document will be produced. This plan will include sites for a minimum of 1,200 homes in addition to the 1,349 already committed in the village clusters to be identified in South Norfolk.'*

We welcome the invitation to submit further sites through this consultation, set out in Policy 7.4, although we consider that the invitation to submit further sites should be made much more clearly on the consultation homepage.

As mentioned previously, my client's land was submitted to the Greater Norwich Local Plan Call for Sites in 2016. The Council noted in their assessment of the site at that time:

- Being to the east of the village, development would have less impact on the historic core;
- Highway concerns were raised about drawing more traffic along narrow lanes like Rectory Road and Harvey Lane;
- Surface water flood risk may impact on the net developable area of the site; and
- The site is less well related to the current built form of the village.

Each of these issues is addressed in turn below.

It is agreed that any development on the site east of the village is unlikely to impact on the historic core of Dickleburgh.

Since the assessment took place, planning permission has been granted for 22 new homes on the north side of Harvey Lane, opposite the site. As part of that application, Hopkins Homes have agreed to:

- Carry out works at the junction of Harvey Lane and The Street to increase visibility to the south at the junction;
- Widen Harvey Lane as much as possible to 4.8m within the limits of the existing highway to provide a school clearway



- Provide a wider footway on the southern side of Harvey Lane.

My client has also commissioned a traffic and transport appraisal, which demonstrates that, even if the site were developed out at high density to provide 56 dwellings, it would generate 32 trips in the morning peak, and 38 in the evening peak. However, in reality, the number of dwellings on the site and the associated trips are likely to be half that number, with only 20-25 dwellings on the site, generating 16 trips in the morning peak and 19 in the evening peak.

In respect of the surface water issue, my clients have commissioned a flood risk assessment of the site. This demonstrates that the whole site is deliverable and that dwellings across part of the site should be set 0.3m higher than external ground level, and that part of the site is set 0.6m higher than the external ground level.

Finally, the principle of development has been established on the north side of Harvey Lane, and the built form of the village now extends along Harvey Lane to my client's site. In light of this, and the improvements to the pedestrian footway proposed as part of the Hopkins scheme, my client's site forms a natural extension to the existing built form of the village.

### **Housing and Economic Land Availability Assessment (HELAA) December 2017**

Our client's site (Ref GNLP0063) was assessed by the Council in the HELAA, which forms part of the evidence base for the Greater Norwich Local Plan. The assessment concluded that it found the site suitable for the HELAA capacity assessment, and that it performed well against all the criteria, although it has an amber rating for access, flood risk, townscapes and transport and roads. Each of these points is addressed below.

#### Access

A Traffic and Transport Appraisal was prepared in January 2020. This report, which is attached to this submission, demonstrates that a safe and suitable access can be delivered on the site. It is proposed that a simple T junction onto Harvey Lane, using the existing field gate, would provide a 5.5m wide carriageway into the site. However, if the development, as is likely, is for fewer than 50 dwellings, the carriageway width could be reduced to 4.8m.

43m visibility splays can be delivered in each direction, as required by the Highways Authority at the consented scheme North of Harvey Lane.

#### Flood Risk

The Flood Risk Assessment demonstrates that the site is located entirely in fluvial flood risk zone 1, and notes that there have been no recorded flood events at the site. There is a low risk of surface water flooding taking place along Harvey Lane, but if this did occur, safe access and egress could be achieved in an eastward's direction along the lane.



## Townscapes

We note that an amber rating states that:

*'Development of the site would have a detrimental impact on townscapes which could be mitigated.'*

We challenge the assertion that this development would have a detrimental impact on the townscape of Dickleburgh.

The Central Norfolk HELAA Methodology Final July 2016 notes that:

*'Sensitive townscapes include those areas within or adjacent to National Parks, the Broads and Areas of Outstanding Natural beauty and include Conservation Area where up to date appraisal have indicated a high level of townscape significance, where development may affect particular concentrations of listed or locally listed buildings with collective townscape value, and any other areas identified as particularly sensitive in Local Plans, local townscape appraisals or historic character studies.'*

The Dickleburgh Conservation Area Character Appraisal and Management Guidelines document was published in 2017. Appendix 3 to the document shows the extent of the Conservation Area, which lies some distance west of the site, around the historic core of the village. The document notes that along Harvey Lane, there is a more spacious grain of development with more modern development which allows landscaping to dominate and makes the lane feel more rural in character.

If the Council believes that there could be a detrimental impact from development of the site, this could be mitigated by designing the layout of the site to fit with the grain of existing development, and by providing significant landscaping to soften the impact of the development. My client's site covers an area of approximately 1.15 hectares, and therefore a development of 20-25 homes could be accommodated and generous green space and planting provided.

## Transport and Roads

We note that an amber rating under transport and roads states that:

*'Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.'*

We support this assessment; the traffic and transport appraisal work which my clients have commissioned clearly demonstrate that this is the case.



## Summary

We welcome the opportunity to respond to this consultation. Below, we summarise the key points made in this response:

- The Plan should not rely on unallocated contingency sites – it should allocate sufficient sites to meet the identified housing requirement, and the focus for additional sites should be smaller, village sites, to increase deliverability.
- The Plan relies heavily on the delivery of large, new sites, with only 9% of new growth planned in villages. It would be a more robust approach to allocate a greater proportion of development in the villages, to support their viability and vitality, and to encourage steady rate of delivery over the Plan period.
- The assessment of capacity for new development in village clusters should not be based solely on village primary school catchments, but should assess where there is a much wider range of services including a shop, pub, post office, good broadband and community facilities. The current approach risks limiting village growth rather than exploring opportunities for development and growth of existing services.
- My client's site has been assessed as being suitable for further consideration through the HELAA. The assessment notes that there are a number of issues which need to be considered further; this response has addressed each of these in turn to demonstrate that the any constraints can be mitigated and that the site is deliverable.

I would be grateful if you would confirm safe and timely receipt of this representation, and that this representation will be passed to South Norfolk District Council, along with the supporting reports on flood risk and traffic and transport, to inform their consideration of sites for potential allocation in the South Norfolk Village Clusters and Housing Site Allocation Plan.

Yours faithfully

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