

Reg 18 Further Consultation Statement

Land to South of Spirketts Lane, Harleston, Norfolk

Local Planning Authority: South Norfolk Council

1.0 Introduction

1.1 The new Local Plan (LP) for Great Norwich and will cover a period up-to 2038. The new Local Plan will comprise of Greater Norwich's strategic and development management policies together with site proposals. The Councils are currently re-consulting on their (Regulation 18 Stage) Consultation draft Local Plan document. The consultation period will close on 16th March 2020.

1.2 This statement is intended for submission as part of the consultation and demonstrates why our client's site, land to South of Spirketts Lane, Harleston, ought to be established as a preferred option for inclusion within the settlement boundary of Shotesham or housing allocation with Greater Norwich future adopted plan.

1.3 This application has examined the site to be put forward to provide evidence-based documents that inform their preparation (including the HELAA).

1.4 Acknowledging the stage at which the Local Plan preparation has reached, this submission provides contextual information for the benefit of the LPA. If we can be of any assistance in providing any further information, then we would be happy to do so.

2.0 Site and Context

2.1 Our client's site is located on the southern side of the market town of Harleston and is a natural continuation of the existing settlement pattern of the town. This is a generally regular shaped land parcel comprising arable land extending to 7.10 hectares in area. The site is bound by existing residential development on the north western side, the embankment to the A143 to the south, Spirketts Lane to the north (with either existing or proposed residential or commercial development) and to the east proposed industrial land, the town's water tower and the Shotford Bowls Club.

Fig. 1 – Aerial image illustrating the position of our client's site in respect of established residential and commercial properties and the A143 to the south.



3.0 Designations and Constraints

3.1 The development site is identified by the Environment Agency as being within 'Flood Zone 1' in its entirety and as such the site is at low risk of flooding according to their data.

3.2 The Local Plan classifies the site as being outside but adjoining the Development Boundary and is therefore a natural extension of the town in a southward direction bounded by the A143.

3.3 Our client's site is not located within a designated area such as Conservation Area, Special Landscape Area (SLA) or Special Area of Conservation (SAC).

3.4 Although there are trees on some boundaries of the site, none are the subject of a TPO.

4.0 Character of the Area

4.1 The site is bounded on the north western side by established residential development and site HAR4 under the Local Plan is scheduled for similar development. To the north east and partly to the east is either existing or future industrial development. There is a natural physical boundary on

the south side of the site with the A143. These boundary uses make the inclusion of the subject property a logical extension of the town.

5.0 Suitability of the Site for Development

5.1 Sites submitted to Greater Norwich for consideration within the context of their emerging Local Plan (at the formal consultation/call for sites stages or otherwise) will be assessed in accordance with their Housing & Economic Land Availability Assessment (HELAA).

5.2 To assess the suitability of sites for development, the HELAA methodology (intended to accord with both local and national planning policy and guidance considerations) prescribes a red, amber, green (RAG) approach to assessing various types of constraints on site deliverability in addition to potential impacts arising (see below). For a site to be 'taken forward' and included in the HELAA capacity assessment, sites are expected to achieve either an amber or green rating against all suitability criteria and furthermore, meet the availability and achievability 'tests' (see below).

5.3 Recognising the stage of preparation which the draft local plan is at, we have provided an initial assessment of our client's site Land to North East of Shotesham Road against the HELAA constraints and impacts criteria. This assessment has demonstrated that there are no over-riding constraints pertaining to our client's site (i.e. 'reds' in the RAG assessment). Furthermore, our client's site passes both the availability and achievability 'tests' and consequently can be considered suitable for inclusion as a preferred site within the adoption of the Greater Norwich Local Plan. A 'summary' site assessment form has been included at Appendix A of this statement that accords with those presented at Appendix B of HELAA assessment document. (December, 2017).

5.4 We would reiterate that the site is suitable for residential development, the site is abutting the town boundary, and with built form continuing to both the north-west, north-east and east, we are of the opinion that this is a very realistic and attractive site to come forward. The town centre is within walking distance where there is wide range of shops and other facilities. We anticipate services are available and a sustainable drainage system will be utilised in respect of surface water with an established outfall following attenuation being available. Therefore, the site represents a suitable site for development, to be considered for inclusion in the emerging plan.

Suitability Assessment Criteria

5.5 **Access to site** – Our client's site can provide a satisfactory access in line with Norfolk County Councils highway standards with an appropriate visibility achieved. The road geometry is not challenging on the surrounding road network. RAG assessment outcome = Green

5.6 **Access to local services and facilities** - The Local Plan currently classifies the site as being outside of the Development Boundary. The site is not 'isolated' in any physical or functional sense, with good access to the town centre and its many shops and other facilities. This is a sustainable location for new development at the scale proposed and constitutes a green RAG assessment.

5.7 **Utilities capacity** - Given the adjacent land land-uses, there is no evidence to suggest that the delivery of utilities will be a constraint on this site. However investigations on the site HAR4 to the north indicate there will need to be an upgrading of the foul drainage system in the area of the

town centre but this is an obligation on Anglian Water under the new financing of foul drainage arrangements and did not prevent that development from being progressed.

RAG Assessment Outcome = Green

5.8 **Utilities infrastructure** – We anticipate foul drainage and potable water will be accessed from Spirketts Lane and medium tension electricity cables are available adjoining the site. There is an adopted surface water outfall passing through the site. Gas is available on the Harleston Industrial Estate and houses in Shotford Road. We are not aware of particular constraints and certainly none believed of a legal nature.

RAG Assessment Outcome = Green

5.9 **Contamination and ground suitability** – There is no evidence to suggest that our client site has contamination issues, there have been no historical work undertaken on the site that would have resulted in any know ground stability issues. The site has not been previously developed.

RAG Assessment Outcome = Green

5.10 **Flood risk** – The site lies within Flood Zone 1 in its entirety there are a low risk of flooding.

RAG Assessment Outcome = Green

5.11 **Coastal change** – The site is not adjacent to a Coastal Change Management Area or Coastal Flood Hazard Zone.

RAG Assessment Outcome = Green

5.12 **Market attractiveness** - The site is known to be in a location which should prove very attractive to the housing market. Recent substantial developments by Persimmon Homes and others in the area on Mendham Lane provides evidence of this.

5.13 **Nationally and locally significant landscapes** - Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes on their setting.

RAG assessment outcome = Green.

5.14 **Townscape** – Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on townscapes. The presence of an existing built environment is important and with a limited south western boundary actually adjoining existing residential property.

RAG assessment outcome = Green.

5.15 **Biodiversity and geodiversity** - Although any future development would be subject to a comprehensive ecological appraisal, it is not considered, at this stage, that development would have a detrimental impact on any designated site, protected species, or ecological networks (or that appropriate mitigation could not be provided).

RAG assessment outcome = Green.

5.16 **Historic environment** – Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets as it currently stands.

RAG assessment outcome = Green.

5.17 **Open space/Green infrastructure** – Development of the site would not result in the loss of any open space. Our client's site is essentially an infill development site with residential properties to the north-west and north and commercial property to the north-east and potentially to the east. The footpath will need to have careful consideration in order to protect the amenity here which in our opinion can be accommodated.

RAG assessment outcome = Green.

5.18 **Transport and roads** - Development of the site will not have a detrimental impact on the functioning of trunk roads/and or local roads. The latter Spirketts Lane has a good width and naturally feeds through to the A143 with that corridor mainly passing through land currently or in future designated for commercial development. To the west of the site is the B1116 travelling south and there is a short section of Spirketts Lane making that connection with good road width. Appropriate visibility is achieved in both directions.

RAG assessment outcome = Green.

5.19 **Compatibility with neighbouring/adjoining uses** – Our client's site would be compatible with existing and/or adjoining uses. Where residential clearly this would be the case and where commercial the Harleston Industrial Estate is on the northern side of Spirketts Lane and therefore not contiguous with the site. The proposed commercial land to the east under Local Plan HAR7 will need a landscaping buffer to be incorporated in the site design but this can easily be accommodated particularly given the geometry of the site where there is an outshoot suitable for this purpose.

RAG assessment outcome = Green.

5.20 The above 'suitability' criteria are just one element of the assessment for the HELAA. In addition to establishing whether sites are potentially suitable for development, sites will also be assessed in terms of whether they are 'available' for development and whether they are 'achievable' and these are discussed below.

6.0 Assessment of Availability

6.1 A site will normally be considered available by the GNLP or the appropriate LPA if it is in the ownership of a developer or landowner who has expressed an intention to develop or sell land for development.

6.2 We take this opportunity to reiterate that the site is available and owned by our clients and there are no known legal restrictions for bringing the site forward in the short term and indeed that would prevent an immediate delivery of new homes. Our clients are actively promoting within the context of this GNLP Reg 18 consultation exercise and will take marketing action should the site feature in the adopted Local Plan.

7.0 Assessment of Achievability

7.1 A site will be considered achievable within the context of the HELAA where there is a reasonable prospect that development will occur on the site at a point in time. A key determinant of this will be economic viability of the site. This will be influenced by the market attractiveness of a site, its location in respect of property markets and any abnormal constraints on the site.

7.2 It has been demonstrated above that there are no abnormal constraints pertaining to the site (i.e. 'reds' in the context of the RAG assessment – see above). Therefore, we believe that the site is readily available and deliverable. Furthermore, it is considered that development is economically viable given its location and market conditions.

7.3 We would reiterate that the site is available immediately, in freehold ownership of our client and there are no technical, legal, or viability constraints that would prevent it from being developed within years 1 - 5. This provides for more than adequate flexibility in providing for any necessary improvements to the capacity of any necessary utility infrastructure.

8.0 Conclusions

8.1 This report has demonstrated, in line with both national and local planning considerations, that our client's site is available, achievable and suitable for inclusion within the GNLP HELAA capacity assessment and as an inclusion within the new development boundary of Harleston within the context of the Greater Norwich Local Plan, SNC's emerging Local Plan and village clusters housing document. This would allow for Harleston to grow proportionately in the future, in line with Government policy. We would reiterate that there are no fundamental constraints or impacts that cannot be mitigated through the subsequent application and development process. Durrants consider that the site would make a valuable contribution to meeting housing needs and thus assisting the Council's vision for further sustainable growth in the local plan period to 2038 and beyond. We would therefore welcome your support for the inclusion of the above site in the emerging Local Plan.

Appendix A - Site Assessment Form

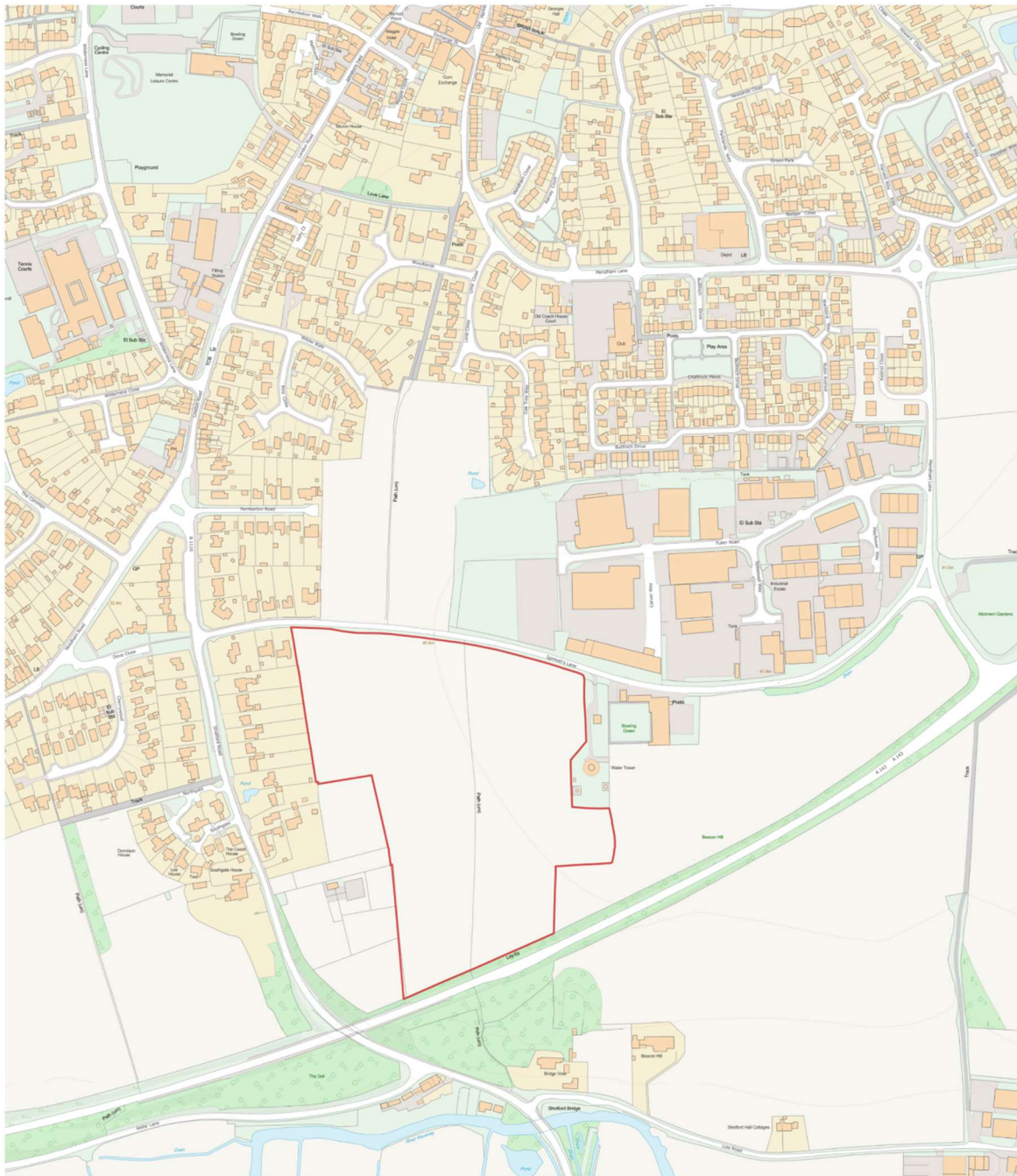
| | |
|--|---|
| Site address: Land to South of Spirketts Lane, Harleston | |
| Current planning status e.g. with permission, allocated, suggested through the Call for Sites etc. | Bare agricultural land and promoted through the Call for Sites process. |
| Site Size (hectares) | 7.10 Hectares |
| Greenfield / Brownfield | Greenfield |
| Ownership (if known) (private/public etc.) | Private, ownership is in control of our clients. |
| Absolute Constraints "Check | |

| | |
|---|---|
| Is the site in a ... | |
| SPA, SAC, SSSI or Ramsar | No |
| National Nature Reserve | No |
| Ancient Woodland | No |
| Flood risk zone 3b | No |
| Scheduled Ancient Monument | No |
| Statutory Allotments | No |
| Locally Designated Green Space | No |
| At risk from Coastal Erosion | No |
| <i>If yes to any of the above, site will be excluded from further assessment.</i> | |
| Development Potential (number of dwellings, hectares of employment land or town centre use floorspace): | |
| Density calculator | On the basis of 25 dwellings per hectare our site can offer a minimum of 160 - 175 dwellings. |

| Suitability Assessment | | |
|---|---|-----------------|
| Constraint | Score (red/amber/green) | Comments |
| Access to site | Green | As above |
| Accessibility to local services and facilities | Green | As above |
| Utilities Capacity | Green | As above |
| Utilities Infrastructure | Green | As above |
| Contamination and ground stability | Green | As above |
| Flood Risk | Green | As above |
| Coastal Change | Green | As above |
| Market Attractiveness | Green | As above |
| Impact | Score (red/amber/green) | Comments |
| Nationally and Locally Significant Landscapes | Green | As above |
| Townscape | Green | As above |
| Biodiversity and Geodiversity | Green | As above |
| Historic Environment | Green | As above |
| Open Space | Green | As above |
| Transport and Roads | Green | As above |
| Compatibility with neighbouring/adjoining uses | Green | As above |
| Local Plan Designations (add further lines as required) | | |
| Designation | Policy reference | Comments |
| | | |
| Availability Assessment (will require liaison with landowners) | | |
| Is the site being marketed? | It is our client's intention to make the site immediately available for sale once the site is designated for residential development in the Local Plan. | |

| | | |
|---|---|---|
| Add any detail as necessary (e.g. where, by whom, how much for etc.) | | |
| When might the site be available for development (tick as appropriate) | Immediately | ✓ |
| | Within 5 years | |
| | 5-10 years | |
| | 10-15 years | |
| | 15-20 years | |
| | Comments: Our client's site is immediately available for development. | |
| Estimated annual build out rate (including justification): | | |
| Comments | Estimated build rate at 40 units per annum. Estimated 4 – 5 years to complete the site. | |
| Achievability (including viability) | | |
| Comments | There are no legal constraints and no abnormal costs associated with delivery of the site for residential purposes. | |
| Overcoming Constraints | | |
| Comments | Any possible constraints thus far identified on site can be reasonably and appropriately mitigated. | |
| Trajectory of development | | |
| Comments | Once the land is designated in the Local Plan work would commence on identifying solutions to surface water, utility and design constraints. This would either be through work undertaken by the clients or more likely with a collaborating developer in making a detailed planning application. | |
| Barriers to Delivery | | |
| Comments | We do not envisage any barriers to the delivery of residential dwellings on this site. | |
| Conclusion (e.g. is included in the theoretical capacity) | | |
| The development process can immediately take place once the land is identified as being suitable for development in the adopted Local Plan. | | |

Appendix B – Location Plan



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100 m
Scale 1:5000 (at A4)



