

Greater Norwich Local Plan Team

By email to: gnlp@norfolk.gov.uk

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Dear Sirs,

# REPRESENTATIONS TO GREATER NORWICH LOCAL PLAN

## STAGE C REGULATION 18 DRAFT STRATEGY AND SITE ALLOCATIONS

## GNLP0394 - LAND WEST OF NEW ROAD, HETHERSETT

Savills (UK) Ltd are instructed on behalf of the Diocese of Norwich to submit representations in support of the site identified as 'GNLP0394' within the emerging Greater Norwich Local Plan (GNLP). GNLP0394 was first submitted through the GNLP call for sites exercise in July 2016.

This covering letter comprises our representations to the current consultation.

We have reviewed the assessment of the site provided within the GNLP Sites Document, and make the following comments in relation to the sites delivery.

Hethersett is within the administrative boundary of South Norfolk District Council.

### Comments on GNLP0394 - Land west of New Road, Hethersett

Below the site is considered against the tests within the NPPG<sup>1</sup>, confirming that it is suitable, available and achievable for development purposes.

### Suitable

It is recognised that GNLP0394 in isolation is more constrained, therefore our client would welcome this site being considered, in full or in part, as a single allocation with GNLP0480 and GNLP0481.

A smaller allocation across GNLP0394, GNLP0480 and GNLP0481 would offer a reasonable addition alongside the villages primary allocation Policy HET1 (part of GNLP0177-A), and could make an important contribution to meeting the housing requirement of the village, with smaller sites often being built-out relatively quickly. Whilst larger strategic allocations such as Policy HET1 provide an important role in meeting housing targets as recognised by the NPPF (para 72), the scale and infrastructure requirements of such proposals are often prohibitive to a timely delivery. Maintaining supply and delivery of new homes is a fundamental objective of the NPPF which recognises that smaller allocations are often delivered in a timely manner, within the first five years

<sup>&</sup>lt;sup>1</sup> Paragraph: 019 Reference ID: 3-019-20140306; Paragraph: 020 Reference ID: 3-020-20140306; and Paragraph: 021 Reference ID: 3-021-20140306



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of the plan (para 68). Accordingly our client believes there would be significant benefits in bringing forward a smaller allocation across GNLP0394, GNLP0480 and GNLP0481 in helping to ensure a timely delivery.

#### Accessibility to Services

Encouraging growth in sustainable settlements within rural areas is in accordance with 2019 NPPF and is considered vital to the long term sustainability of rural communities (NPPF para 78).

Hethersett is identified as a 'key service centre' in the GNLP Strategy Document. Key service centres are identified by the GNLP at paragraph 333 as having 'a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas'. Hingham has services and facilities including two primary schools, a secondary school, convenience shops, a post office, a pharmacy, doctor and dentist surgeries, a library and a small business centre. These are within easy walking/cycling distance of the site connected by a pedestrian footpath.

Hethersett is well related to Norwich and Wymondham where a number of facilities and services exist including leisure and employment. It is also is located a short distance from strategic highway infrastructure in the form of the A11 and A47. There is a bus stop located under 150m from the site which is served by seven bus routes, the 9, 13A, 13B, 13C, 14, 15 and 15A providing a regular service to surrounding settlements including Norwich.

#### Landscapes

It is noted that GNLP0394, GNLP0480 and GNLP0481 are located within the strategic gap between Hethersett and Wymondham, however as set out by the GNLP team in support of GNLP0480, they are reasonably well related to the existing settlement adjacent to the settlement limit, and therefore it would not necessarily preclude a sensitively designed development through a new Local Plan allocation.

### Transport and Roads

Access to the proposed allocation (GNLP0394, GNLP0480 and GNLP0481) could be provided via the B1172 or via New Road. A shared footpath/ cycleway runs along the length of the B1172 connecting the proposed allocation with the village. Further upgrades to pedestrian infrastructure could be provided as part of development of the site.

### Drainage

With respect to surface water drainage issues, there are no known reasons why a Sustainable Urban Drainage System (SUDS) could not be incorporated as part of the development of the site, thus addressing any pressures on site drainage and runoff patterns. Any allocation in the GNLP could incorporate measures to ensure special consideration is made by the developer in implementing the drainage strategy to ensure that the surface water drainage at this location is addressed and mitigated, without increasing risk to other areas of the site or to off-site areas.

### Other Comments

There are few other physical limitations or constraints on the site which would make development of the site difficult or unacceptable. The site is not located within Flood Zones 2 and 3 and is not subject to any PROW which may affect development of the site.

### <u>Available</u>

Should GNLP0394 alongside GNLP0480 and GNLP0481 be accepted as an allocation for residential development, our client would look forward to working alongside neighbouring land owners with view to realising a single allocation across the three sites. Discussions between the three parties would commence at



the earliest opportunity should this potential allocation be favourable to the Council. Some early discussions between parties have already been had.

It is considered that all or part of GNLP0394 could come forward for development.

#### <u>Achievable</u>

As noted above, there are no known major technical constraints relating to GNLP0394, GNLP0480 and GNLP0481 and therefore it is considered their development would be economically viable. Services including electricity, mains water, foul sewerage and telecommunications are available.

There are no other known factors that mean development of the sites would be difficult or unachievable. Therefore, it is clear that these sites present a deliverable option for housing and could make a material contribution to the housing targets of Hethersett, particularly in the short term where the delivery of Policy HET1 may be slower.

#### Conclusions

It is considered that GNLP0394 alongside GNLP0480 and GNLP0481 is sustainable and deliverable as defined by the NPPF, and a suitable location for residential development. GNLP0394, within the ownership of the Diocese of Norwich, alongside the third party sites GNLP0480 and GNLP0481 represent an attractive option for housing growth within the District.

Whilst our client supports Hethersett's primary allocation 'Policy HET1', our client believes there would be significant benefits in bringing forward a smaller scale allocation in helping to ensure a timely delivery within the first five years of the plan, highlighting that whilst larger strategic allocations such as Policy HET1 provide an important role in meeting housing targets, the scale and infrastructure requirements of such proposals are often prohibitive to a timely delivery.

I would be grateful if you could keep me updated in relation to the next stage of the Local Plan process and, reserve the right to appear at the Examination sessions, if required, when they take place.

Please do not hesitate to contact me should you require any further information.

Yours faithfully,

Gareth Watts MRTPI Planner