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**WALSINGHAM PLANNING**

SPECIALIST PLANNING & DEVELOPMENT CONSULTANTS

# Greater Norwich Local Plan Pre-submission Draft Consultation

Land off Eversley Road, Hellesdon

Representations on behalf of Eversley Road Norwich Ltd

March 2021

**Walsingham Planning**

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King Street

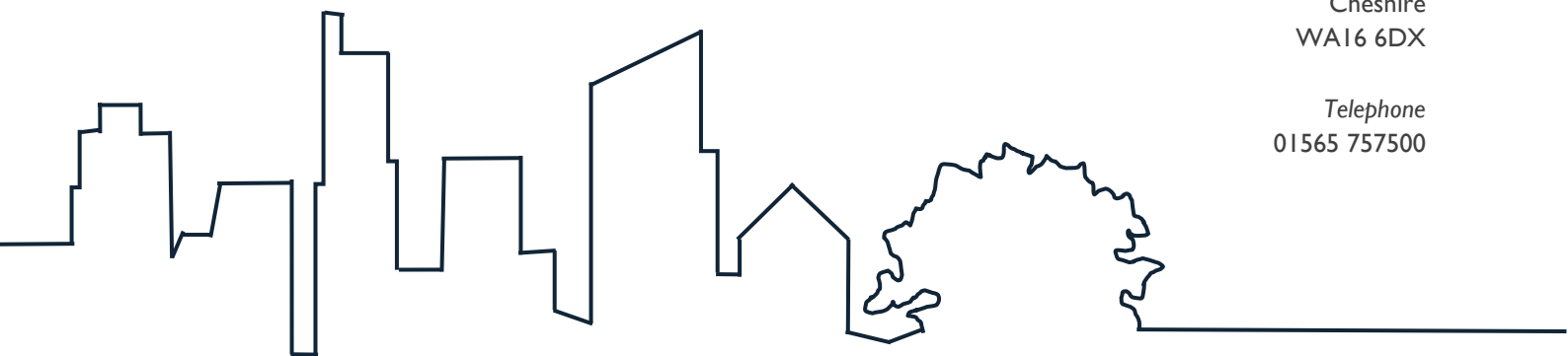
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**APPENDIX I – SITE LOCATION PLAN**

# I INTRODUCTION

- I.1 This representation has been prepared by Walsingham Planning on behalf of Eversley Road Norwich Limited (hereafter referred to as ERNL) and relates to the consultation on the Pre-submission Draft of the Greater Norwich Local Plan (GNLP).
- I.2 We understand that, once adopted, the GNLP will identify the strategy for growth for the Greater Norwich area (including Broadland District) and will outline site allocations and development management policies to help guide development during the course of the plan period (2018 – 2038). The GNLP will supersede Broadland Council’s Development Management DPD (adopted in 2015) and Site Allocations DPD (adopted in 2016).
- I.3 ERNL own land off Eversley Road in Hellesdon, as shown on the accompanying Plan at **Appendix I**. The previously developed site measures 0.87 hectares and forms part of a housing allocation (HEL5) in Broadland Council’s Site Allocations DPD. The majority of the allocation has been built out and now comprises 67 homes; however, our client’s site has not been developed for housing.
- I.4 The site has not been carried forward for re-allocation in the GNLP. ERNL is therefore promoting the site for residential development via this Regulation 19 consultation.
- I.5 ERNL has no commentary to make regarding the legal compliance of the Plan, or the GNLP Board’s duty to cooperate. Our client is, however, of the opinion that the Plan, in its current form, is unsound.
- I.6 The structure of this representation is as follows:
- **Section 1:** Introduction
  - **Section 2:** Tests of Soundness
  - **Section 3:** Concluding Remarks

## 2 TESTS OF SOUNDNESS

- 2.1 ERNL is of the opinion that the Pre-submission Draft of the GNLP is, in its current form, is unsound.
- 2.2 For the reasons that we explain in this section, the Plan is not justified, nor is it consistent with national policy.

### **NOT JUSTIFIED**

- 2.3 Paragraph 176 of the Pre-submission Draft Strategy document explains that existing allocations (such as those identified within Broadland Council's Site Allocations DPD) that are sustainable and deliverable before 2038 will be carried forward into the GNLP. We therefore question why our client's land – which forms part of a partially delivered housing allocation (HEL5) – has not been carried forward for re-allocation in the GNLP.
- 2.4 Throughout the plan-making process, starting from the Regulation 18 Preparation Stage, the site has not once been considered for re-allocation, despite it forming part of an existing housing allocation. The Strategy document and Sites Plan provide no explanation for omitting what is an available, suitable and achievable opportunity for new housing, in a highly accessible and sustainable location. It is on this basis that the GNLP cannot be considered justified.
- 2.5 The site extends to an area of 0.87 hectares and, subject to further technical work, is capable of delivering around 20 to 25 new dwellings. It meets the qualifying criteria in relation to minimum allocation size (0.5 Ha), prescribed at paragraph 188 of the Strategy document and paragraph 1.4 of the Sites Plan, and should therefore have been considered by the Board for re-allocation for housing.
- 2.6 By virtue of its current status as a housing allocation, endorsed through the Site Allocations DPD, our client's land must be considered deliverable for housing. The part of the allocation that has been built out with 67 dwellings (LPA reference: 2015/2077) demonstrates that the site is suitable. Indeed, if our client's site was not considered to be deliverable for housing, then the Council would never have allocated it in the Site Allocations DPD.
- 2.7 In assessing the sites that it considered for housing in the GNLP, the Board set out a site assessment process. This was based on the tests of 'availability', 'suitability' and 'achievability', outlined in the Housing and Economic Land Availability Assessment (HELAA), which the Board produced in 2017. The 'suitability' of each site was assessed having regard to its constraints (such as vehicular access, proximity to local services and facilities, etc) and its possible impacts of future development. The 'achievability' of each site was considered having regard to its market attractiveness and whether there were any abnormal constraints on the site. It was through this process that the Board was able to identify a shortlist of sites with the potential for being allocated, prior to being subjected to sustainability appraisal by external consultants.

- 2.8 Our client's site, comprising land off Eversley Road, satisfies the aforementioned tests in relation to 'availability', 'suitability' and 'achievability' and should be considered for re-allocation in the GNLP.
- 2.9 Our client owns the entire site and has a lawful right of access through the developed portion of the allocation from Eversley Road. The site is currently vacant, ready and available for residential development.
- 2.10 The site is suitable for housing. Preliminary assessment work has indicated that it is capable of accommodating around 20 to 25 new dwellings. Although partially overgrown, the site is brownfield and can be accessed from Eversley Road via Silk Mill Road within the developed portion of the allocation.
- 2.11 The site is in close proximity to the shops and services on the A140 and Aylsham Road, and is within a 1km radius of four primary schools (Heather Avenue Infant School, Mile Cross Primary School, Catton Grove Primary School and Firside Junior School). There are no heritage constraints within or near the site, nor are there any protected trees within its boundary. The site is in a Flood Zone 1 and has a low risk of flooding.
- 2.12 The site is surrounded by housing on three sides (to the north, west and south). Its future development with housing would essentially fill the gap between Lillian Close (to the south) and Waldemar Avenue (to the north) and would represent clear planning logic.
- 2.13 Our client is unaware of any constraints that would preclude the development of the site for housing. Any impacts arising from the development of the site could also be appropriately mitigated or managed, as required.
- 2.14 Given the above and the scale of the site, it would be realistic to predict that housing could be developed within years 5 to 10 of the GNLP period (i.e. 2023 to 2028). The site has been marketed in the past and ERNL has been approached by developers regarding the availability of the site, thus highlighting its market attractiveness. Hellesdon is a desirable place to live and this is perhaps best demonstrated by the recently completed housing development on the developed portion of the allocation, in which all 67 properties are occupied. It is for these reasons that a residential development of 20 – 25 dwellings on the site can be considered achievable.
- 2.15 Given its current status as an existing allocation, it is surprising and unexplained why the site has not once been assessed for re-allocation in the GNLP. This is contrary to the statement made in paragraph 176 of the Strategy document (see paragraph 2.3 above). The approach taken by the Board, in this regard, is contrary to paragraph 67 of the NPPF which states:

*“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land available assessment...”*

- 2.16 In the absence of any explanation for the omission of the site, the GNLP cannot be considered justified. A reasonable alternative (i.e. our client's site) has not been assessed. Given its status as a sustainable and deliverable brownfield site – which is available, suitable and achievable for housing – it should have been identified in the HELAA (2017) and for re-allocation during the previous stages of the plan-making process.

## **INCONSISTENT WITH NATIONAL POLICY**

- 2.17 Paragraph 16 of the NPPF states that plans should:

*“be prepared with the objective of contributing to the achievement of sustainable development...”*

- 2.18 This is a legal requirement for strategic plan-making authorities under Section 39(2) of the Planning and Compulsory Purchase Act (2004).

- 2.19 Therefore, in preparing a new local plan, it is generally regarded as good planning practice to consider sustainable brownfield sites for housing – such as our client's land – before considering less sustainable greenfield sites, including those on the edge of settlements and beyond. This is often termed as 'the brownfield first' approach.

- 2.20 The GNLP allocates a significant number of greenfield sites for new housing. Paragraph 188 of the Strategy document explains that 78% of new homes planned are on greenfield sites, with the remaining 22% planned on brownfield land. It is therefore clear that in omitting our client's site from the site assessment process – in favour of less sustainable greenfield locations – the GNLP has not been properly prepared with the objective of contributing to the achievement of sustainable development.

- 2.21 As we have demonstrated, our client's land is a sustainable and deliverable brownfield site, which is available, suitable and achievable for around 20 – 25 new homes. It forms part of an existing allocation and the Board's failure to recognise it for re-allocation, without any explanation, is wholly inconsistent with the principles of the NPPF.

- 2.22 The omission of the site for re-allocation – in favour of less sustainable greenfield sites – is also contrary to the growth strategy identified at paragraph 188 of the Strategy document. According to clause (c), the strategy for the location of growth:

*“...Focusses most of the growth in locations with the best access to jobs, services and existing and planned infrastructure in and around the Norwich urban area and the Cambridge Norwich Tech corridor....”*

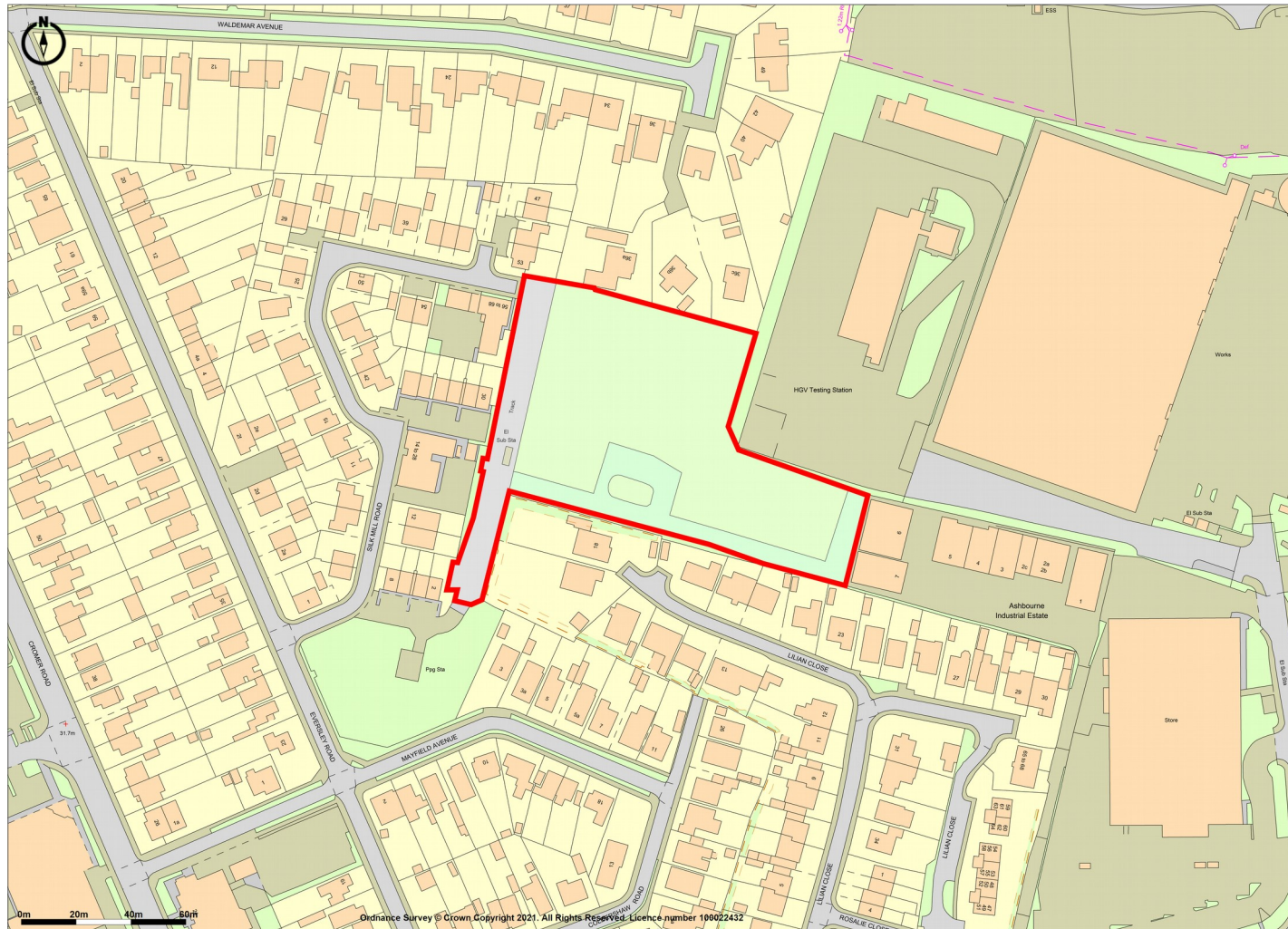
- 2.23 If the GNLP was to truly be focussing most of its growth in the Norwich urban area, in locations with the best access to jobs, services and infrastructure, then our client's site would be re-allocated for housing.

### 3 CONCLUDING REMARKS

- 3.1 Our client, ERNL, own a parcel of land off Eversley Road in Hellesdon, as shown on the accompanying Plan at **Appendix I**. The previously developed site measures 0.87 hectares and forms part of a housing allocation (HEL5) in Broadland Council's Site Allocations DPD. Whilst the majority of the allocation has been built out with housing, our client's land has not been developed.
- 3.2 Contrary to paragraph 176 of the Pre-submission Draft Strategy document, the site is not proposed for re-allocation in the GNLP. In the absence of any justification for omitting the site for housing, the Plan should not be considered justified. A reasonable alternative (i.e. our client's site) – which is available, suitable and achievable for housing – has not been assessed or considered by the GNLP Board at any stage of the plan-making process.
- 3.3 The omission of our client's brownfield site, in favour of less sustainable greenfield sites for allocation, is also inconsistent with the key principles of the NPPF. Strategic plan-making authorities are required by law to prepare their plans with the objective of achieving sustainable development. It should therefore be incumbent upon the Board to consider our client's sustainable site for housing.
- 3.4 It is for the above reasons that the GNLP is not justified, nor is it consistent with national policy. It is unsound. We would encourage the Board to reallocate our client's site for housing in order to address these concerns.

## **APPENDIX I – SITE LOCATION PLAN**





**Promap**

● LANDMARK INFORMATION

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