

Ref: GA/DJ/05719/L0005

22nd March 2021

Greater Norwich Local Plan Team
County Hall
Martineau Lane
Norwich
NR1 2DH

Sent by email to gnlp@norfolk.gov.uk

**Greater Norwich Local Plan Regulation 19 Publication
Policy DRA1: Land east of Cator Road and north of Hall Lane, Drayton
Representations on behalf of Hopkins Homes Limited**

Dear Sir / Madam

On behalf of our client, Hopkins Homes Limited, we are pleased to make representations to the Greater Norwich Local Plan (GNLP) Regulation 19 consultation with respect to **Policy DRA1** that allocates land east of Cator Road and north of Hall Lane, Drayton for residential development. Please find enclosed with this letter the required Representation Form and a location plan of our client's site.

Our client **supports the allocation of their site** for residential development but considers Policy DRA1 as currently worded to be **unjustified, ineffective, and therefore unsound** as it fails to take account of the most recent position with respect to planning permissions on the site.

Background

The site has a long planning history dating back to 2013 when an outline planning application (Ref: 20130885) was submitted by Drayton Farms Ltd for up to 200 homes. This application was approved in August 2015, before a revised outline application was submitted by Drayton Farms Limited for up to 250 homes in June 2016 (Ref: 20161066). This second application was approved in February 2020. A third application for full planning permission was then submitted by our client for 267 dwellings on a slightly larger site in March 2020 (Ref: 20200640). This application received a resolution to grant planning permission at planning committee on 24th February 2021 and the planning permission is expected to be granted within the next few weeks following the

The Exchange | Colworth Science Park
Sharnbrook | Bedford | MK44 1LZ
t 01234 867135 | e info@arplanning.co.uk | w www.arplanning.co.uk

Armstrong Rigg Planning Ltd
Registered in England & Wales No 08137553. Registered Address:
The Exchange, Colworth Science Park, Sharnbrook, Bedford, MK44 1LQ.

completion of a S106 agreement.

Representations

Policy DRA1 proposes to allocate the site for approximately 250 homes subject to fulfilling several criteria (none of which our client objects to as they reflect the content of their planning application). The proposed allocation is described as being carried forward from the adopted Local Plan, but this ignores the fact that it has been significantly changed from the Policy DRA1 as set out in the Site Allocations DPD (adopted 2016) which simply allocates the site for 200 dwellings, allotments and open space in accordance with permission 20130885.

The supporting text to the now proposed Policy DRA1 (GNLP paragraph 3.36) sets out that:

"The site was allocated in 2016 as part of the Broadland Local Plan but has not yet been developed. The principle of development on the site has already been accepted and it is expected that development will take place within the time-period of the new local plan up to 2038. The site is likely to accommodate at least 250 homes reflecting planning permission 20161066 resolution to grant outline approval subject to the satisfactory completion of a Section 106 Agreement. More may be accommodated, subject to an acceptable design and layout etc. being achieved."

This paragraph is now clearly out of date following the resolution to grant full planning permission for our client's application for 267 dwellings on 24th February 2021.

In order to be considered justified and therefore sound, Policy DRA1 must set an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. In this context, our client's planning application, which was accompanied by detailed technical evidence, has demonstrated that the development of a slightly larger site for 267 dwellings represents a more appropriate strategy. The current policy is therefore unjustified in seeking to restrict development to the previously proposed site extent and quantum of development. The proposed policy would also be ineffective as it differs from the soon to be approved development.

Proposed Modifications

In order to ensure the GNLP is sound, Policy DRA1, its supporting text and accompanying maps should be amended as follows to reflect our client's full planning application.

Supporting Text

The supporting text needs changing as follows:

*3.36 The site was allocated in 2016 as part of the Broadland Local Plan but has not yet been developed. The principle of development on the site has already been accepted and it is expected that development will take place within the time-period of the new local plan up to 2038. The site is likely to accommodate at least **26750** homes reflecting planning permission **20200640-20161066** resolution to grant outline approval subject to the satisfactory completion of a Section 106 Agreement. More may be accommodated, subject to an acceptable design and layout etc. being achieved.*

Policy Text

The policy text need changing as follows:

POLICY DRA1

*Land east of Cator Road and north of Hall Lane, Drayton (Approx. **16.212.5** ha) is allocated for residential development, allotments and open space. This will accommodate approximately **26750** homes.*

The development will be expected to address the following specific matters:

Vehicular access to be achieved from Hall Lane and School Road.

Appropriate surface water drainage proposal to mitigate risk of surface water flooding issues associated with this site.

Green infrastructure linkages provided from the site to Hall Lane and Reepham Road via a network of footpaths to the side of School Road and also across the adjoining agricultural field to the north east of the site. A footpath/cycleway should also be included to the south side of Reepham Road from the junction with School Road to the roundabout at Drayton Lane.

Provision of onsite public open space in accordance with relevant policy.

Provision of allotments.

Any development must conserve and enhance the significance of the grade II listed 4 Manor Farm Close including any contribution made to that significance by setting. This includes but is not limited to appropriate landscaping, setback and design.

Settlement Map and Site Allocation Focus Map

These maps need changing to reflect the revised site area for our client's planning application (see **Location Plan enclosed**).

I trust these representations will be taken into account in examination of the GNLP and we look forward to participating further during the course of the examination. If you have any questions in the meantime, please do not hesitate to contact me.

Yours sincerely

Geoff Armstrong (geoff.armstrong@arplanning.co.uk)

Director

Armstrong Rigg Planning

Tel: 01234 867135

Mob: 07710883907

Encs.

Enclosure 1. Representation Form

Enclosure 2. Location Plan