



**GNLP Regulation 18 Consultation Response
March 2018**

**Land to the North of Mulbarton
Site Reference Number GNLP0496
Prepared on behalf of Glavenhill Strategic Land**

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1. Executive Summary

The proposed allocation site is well located in Mulbarton which is within the Norwich Policy Area. Mulbarton is located approximately 6 miles south of Norwich City Centre and 5 miles to the west of Wymondham. It is a mid-sized service village that provides a good range of services for its residents' day-to-day needs. These include a Doctors' Surgery, Dentist, Post Office, Mobile Library, community centres, children's nursery, infant and junior school, sports clubs, 2 supermarkets, hairdressers, Chinese/fish and chip takeaway, pub and regular bus services to and from Norwich.

Mulbarton is identified as a service village in the approved Joint Core Strategy. As a well-located key service village, Mulbarton is an appropriate place to accommodate new housing development.

The site makes a logical extension to the village to help accommodate future growth. It is not within an environmentally sensitive location where the NPPF would require development to be restricted. Technical Assessments have demonstrated that the site has the capacity to accommodate the proposed development in an acceptable manner and that impacts can be satisfactorily mitigated.

The Indicative Site Plan shows one way in which the site could be developed to accommodate up to 180 dwellings, a site for a new doctor's surgery, burial ground extension and an additional 9.81 ha of Green Infrastructure.

Clear benefits will arise from this proposal as follows:

- Immediately deliverable site to contribute towards housing supply;
- Delivery of affordable housing in line with Joint Core Strategy policy to help meet the significant under provision in affordable housing;
- Delivery of a site for a new Doctors Surgery to serve the village;
- Provision of land for an extension to the Church Burial Ground;
- Support to local shops and services. Both national and local planning policies seek to retain and enhance the provision of local services in rural areas. The new residents from the development will help to support the viability of local services in Mulbarton and, therefore, aid their continued provision;
- Delivery of new public open space with the ability to provide additional Green Infrastructure to the north of Norwich Road if desirable;
- Delivery of a new roundabout and highway/footway improvements which will help to slow down traffic on the approach into the village;
- Connection into and upgrade of existing pedestrian route through Churchyard to south of site to provide shared footway/cycleway access to the Common and upgrade to footway along The Common.
- Financial contribution towards improving kitchen and toilet facilities at the Church to enable increased community use;

- Provision of dropped kerb crossing point to enable pedestrian access to Farm Shop at Paddock Farm.
- Delivery of over £1,187,000 New Homes Bonus over 4 years to Norfolk County Council and South Norfolk Council to use locally. It is considered that this should be used to help facilitate the delivery of the new Doctors Surgery.

There are no overriding constraints that would prevent this site from being developed and Glavenhill Strategic Land respectfully request that it be allocated in the Greater Norwich Local Plan.

2. Site Introduction and Description

A larger version of this site was promoted by Glavenhill Strategic Land through the July 2016 'call for sites' process for residential development of up to 254 homes, a new Norwich Road Park containing 9.81 hectares of green infrastructure, Primary School site and residential care home for the elderly.

The size of this site has now been reduced following further assessment and is shown on the site plan at Section 3. below. The site could accommodate up to 180 homes, a new doctors surgery to serve the village and an extension to the Church burial ground. The site now extends to 13.27 hectares (including public open space, landscaping and surface water attenuation measures). There is further land available for additional green infrastructure to the north of Norwich Road if considered necessary.

The site is located to the north-east of the village adjoining the existing development boundary. At its northern end it abuts the B1113 Norwich Road which runs north-south through the village linking it with Norwich to the north and Bracon Ash and New Buckenham to the south. It also provides a link to the B1135 Wymondham Road to Hethel Engineering and onwards to the A11.

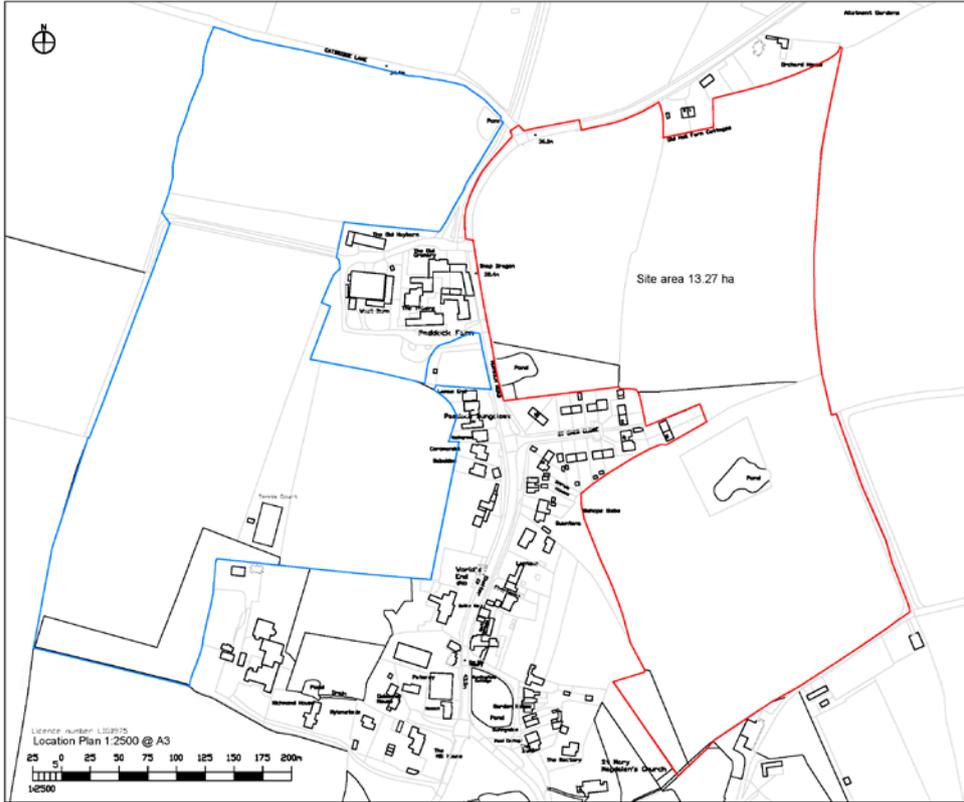
The site comprises 3 arable fields which are each substantially enclosed by boundary hedging. The north-west boundary to the B1113 Norwich Road is, however, open on the approach into the village allowing views across to the listed Paddock Farm.

The site is largely bordered by existing development to the south and west. The north-east corner of the site adjoins the rear gardens of residential properties fronting the B1113 Norwich Road. Existing houses and gardens on Saint Omer Close form a wedge of existing development between the two northern fields and southern field. These houses are separated from the northern two fields by an area of existing grass and scrubby shrubs. The southern field adjoins residential curtilages and small farmsteads to the south and west. To the east of the site are large agricultural fields and a public footpath runs east west across these and along the southern boundary of the site providing pedestrian access to Mulbarton Parish Church and Mulbarton Common to the south.

Mulbarton is located approximately 6 miles south of Norwich City Centre and 5 miles to the west of Wymondham. It is a mid-sized service village that provides a good range of services for its residents' day-to-day needs. These include a Doctors' Surgery, Dentist, Post Office, Mobile Library, community centres, children's nursery, infant and junior school, sports clubs, 2 supermarkets, hairdressers, Chinese/fish and chip takeaway, pub and regular bus services to and from Norwich.

Mulbarton Infant and Junior Schools are located on The Common and are easily accessible from the site. The site is also well located to take advantage of existing bus stops located on the B1113 Norwich Road within circa 500m of the site, i.e. approximately a ten-minute walk. Half hourly services are available to Norwich.

3. Site Location



NOTES

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All dimensions are in millimetres unless stated otherwise.

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These files can be found at <http://www.osm.gov.uk/development/development.html>

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Lanpro
CONSTRUCTION AND DESIGN

Head Office: Redwood House, 18 Fiddlers Way, Newark, Nottinghamshire, NG24 1RQ
Tel: 01662 521 216 Fax: 01662 521 217

4. Site Opportunities

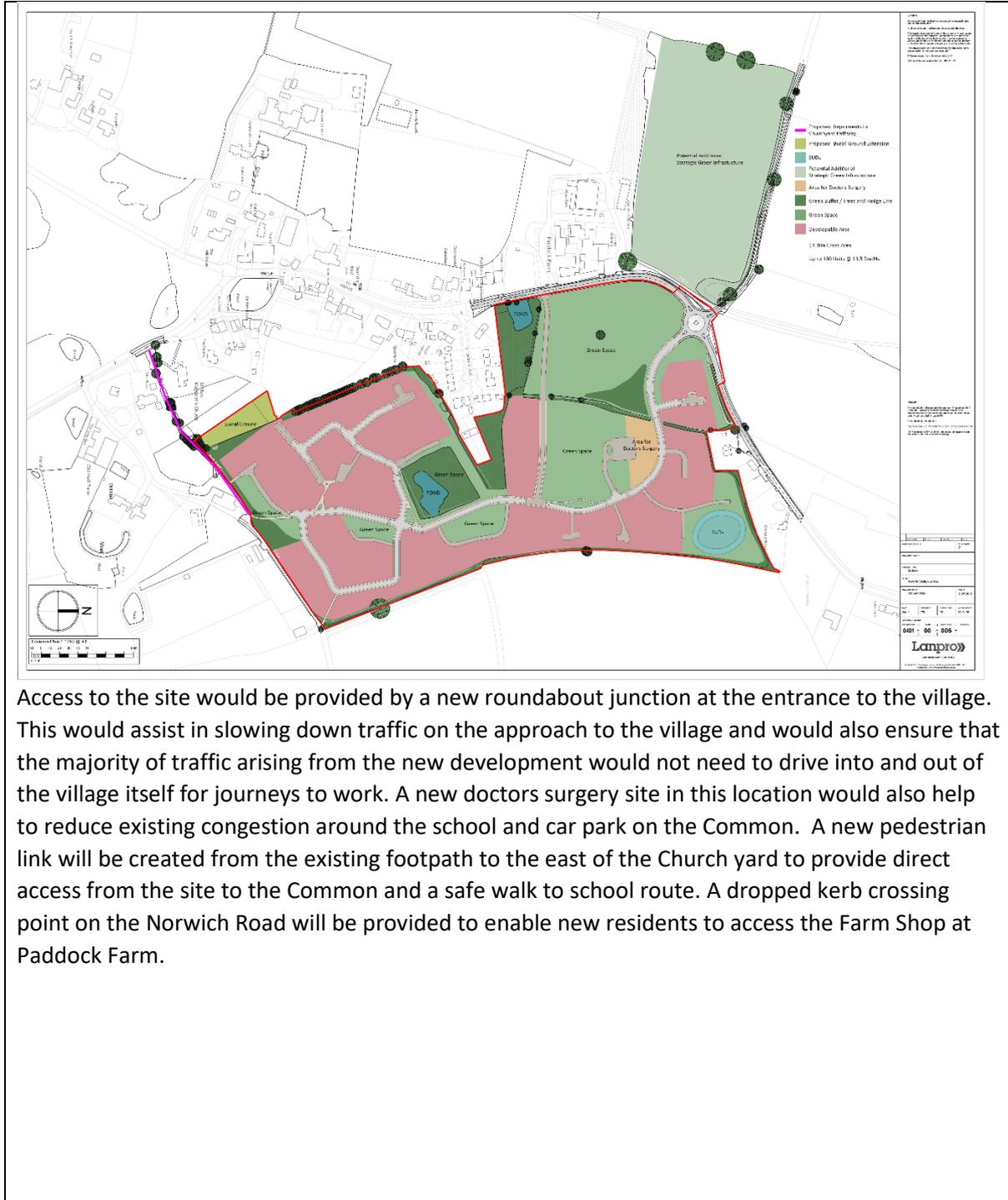
Glavenhill Strategic Land have signed a promotion agreement with the landowner on this site and are committed to securing outline planning permission on it and ensuring that it is marketed to an active housebuilder within the next 2 years.

The existing JCS identifies Mulbarton as being within the Norwich Policy Area (NPA). The NPA has been designated to accommodate the majority of planned growth for the Greater Norwich Area due to its close proximity to Norwich and the ability to provide sustainable development both in terms of transport connectivity and the proximity of jobs and services. Whichever of the 6 growth options are chosen, a significant proportion of new development should be directed to Norwich and its immediately surrounding villages, where there is capacity. This is a sustainable approach to locating new housing.

Existing JCS Policy 15 lists Mulbarton as a Service Village suitable to accommodate some housing development. Mulbarton is within easy commuting distance of employment opportunities within Norwich City Centre, the Norwich Research Park, UEA and University Hospital and Hethel Engineering Centre. It is a village where people want to live evidenced by the take up of new housing development that has already taken place in the village. Provision of additional new housing in the village will assist in providing a co-ordinated approach to future jobs growth in the key employment locations specified above.

Mulbarton Neighbourhood Plan policy HOU1 details that new development should be directed to the north of the village. This site meets that requirement and the following summaries of technical assessment work undertaken to date, demonstrate that this site has capacity to accommodate housing growth in conjunction with new local facilities to serve the village.

The indicative site plan (Figure 2 below) shows how this site could be developed to accommodate up to 180 dwellings, a site for a new doctor's surgery to serve the whole village, as well as an extension to the burial ground for the adjacent Church because the existing one is now nearing capacity. Open space areas to serve the development include a new northern Common at the entrance to the village. An additional 9.81ha of green infrastructure to serve wider deficiencies within the area could also be provided to the north of Norwich Road at the entrance to the village. This is also indicated on the plan.



Access to the site would be provided by a new roundabout junction at the entrance to the village. This would assist in slowing down traffic on the approach to the village and would also ensure that the majority of traffic arising from the new development would not need to drive into and out of the village itself for journeys to work. A new doctors surgery site in this location would also help to reduce existing congestion around the school and car park on the Common. A new pedestrian link will be created from the existing footpath to the east of the Church yard to provide direct access from the site to the Common and a safe walk to school route. A dropped kerb crossing point on the Norwich Road will be provided to enable new residents to access the Farm Shop at Paddock Farm.

5. Consultation Questions

**answer/delete when appropriate

Section 3 – The Vision and Objectives for Greater Norwich

1. Do you agree with the draft version and objectives for the plan below?

Yes, Glavenhill Strategic Land broadly agree with the vision and objectives for Greater Norwich to 2036 as set out at Figure 1, subject to our more detailed representations on specific issues below.

Section 4 – The Strategy

Delivering jobs, homes and infrastructure

2. Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1-4.7?

The Greater Norwich Local Plan is an opportunity to make the wider Norwich area a hub for investment, commercial activity and high- quality place making, which will be of benefit to all who live and work there, building on the significant existing attributes.

We welcome the joint working of the different authorities, who will lead the planning process for this Plan, in our view to take the required strategic view essential to the future prosperity of the Greater Norwich area.

We are presently at a unique position, where there is a recognition that growth is needed, there is a need for investment particularly on key infrastructure, clear opportunity areas (particularly around the A11 corridor), potential rail improvements and a recognition that new settlements may form a key role in ensuring delivery.t

There is a need for the Greater Norwich area to benefit from the economic growth at Cambridge and not be left behind by its accelerated investment. Greater Norwich at the very least must protect its economic position and not get left behind.

It is our view that there are a series of opportunities that recognise the existing attributes within the area, but which can also secure the levels of economic growth which will be of benefit to those who live and work here.

There is a recognition in the Regulation 18 consultation of the positive attributes of the Greater Norwich area, which are supported. However, to ensure a bright and prosperous future an ambitious strategy is essential, which also respects existing key characteristics.

We have serious concerns regarding the calculation of the overall housing requirement for the plan period as set out in our answer to question 4 below. The favoured option must be to deliver forecast jobs growth plus additional growth. We are of the view that a realistic assessment of the

requirement would lead to a figure of between 10,000-14,000 homes in order to deliver City Deal jobs growth aspirations.

It is our submission that a new settlement in the Cambridge-Norwich Tech Corridor sitting alongside a range of smaller sites to be apportioned and located as set out in our response to question 9 is the right approach to ensure a choice of sustainable sites and to facilitate delivery of required housing numbers within the plan period. Allocation of this site at Mulbarton should form part of that strategy.

Job Targets

3. Which option do you support for jobs growth? (refers to options on pg.28)

There is a recognition in the Regulation 18 consultation of the positive attributes of the Greater Norwich area, which are supported, however to ensure a bright and prosperous future an ambitious strategy is essential, which also respects existing key characteristics.

The Greater Norwich Local Plan is an opportunity to make the wider Norwich area a hub for investment, commercial activity and high-quality place making, which will be of benefit to all who live and work there, building on the significant existing attributes.

The favoured option must, therefore, be to deliver forecast jobs growth plus additional growth (Option JT1).

Calculating the Housing Numbers for the Plan

4. Do you agree that the OAN for 2017-2036 is around 39,000 homes?

Glavenhill Strategic Land broadly support Growth Option 3 to support the Cambridge- Norwich hi-tech corridor. However, the overall housing requirement number of 7200 dwellings derived from an OAN of around 39,000 is not supported and is considered to be too low.

The GNDP's 2016 call for sites consultation considered that sites for around 12,000 new homes were needed. It is surprising that this has reduced so significantly to 7200 for this round of consultation. We are very doubtful that this figure is sufficient to meet the housing requirement for Greater Norwich for the period to 2036.

At this point in time we do not support the use of the Government's proposed methodology for the calculation of OAN as set out in the consultation paper 'Planning for the Right Homes in the Right Places'. This is still at the consultation stage and has been subject to a significant number of representations objecting to various aspects of the proposed calculation e.g. from the Planning Officers Society, Homebuilders Federation and the RTPI. One of the many failings of the proposed methodology is the absence of consideration of economic objectives. There is no certainty that this methodology will come into effect, either in its current form, or at all.

We do not support the figure of 7200 homes arising from the use of the draft Government methodology for the calculation of housing numbers. Para 4.17 of the Growth Options Document states that the OAN figure for Greater Norwich is 38,988 dwellings for 2017 - 2036 based upon this methodology. This figure should be used with caution because it uses figures taken from the 'Application of proposed formula for assessing housing need, with contextual data' table that accompanies the Government Consultation document. This is an indicative assessment of dwellings per annum need based upon a draft formula for the period 2016-2026, rather than for the period 2017 -2036. Furthermore, it does not consider economic objectives for the area.

The calculation of the OAN should in any event be only a starting point for calculating housing numbers for the plan. The Government OAN figure does not include the housing necessary to deliver economic objectives via the City Deal which has been agreed with Central Government in order to help turn knowledge into growth and 13,000 additional jobs'. Delivery of these objectives is necessary to ensure that the area is eligible to receive the related Government funding for infrastructure and business support, enterprise and innovation that is due from this. We consider that it is important that the City Deal requirements are included as they have already been committed to and will contribute to the Greater Norwich and wider economy.

Plan makers are entitled to utilise different methods of assessing need to the Government's draft methodology and if these produce figures that are higher, the Government proposes that Inspectors should consider such approaches sound unless there are compelling reasons to indicate otherwise. Therefore, where it is sensible to propose higher figures based on employment growth or higher affordable housing needs there is scope to do this and the "significant contribution" that Government sees the City Deal making "to the recovery and future growth of the UK economy" (source: Greater Norwich City Deal) is valid justification for this.

Furthermore, paragraph 158 of the NPPF requires that Local Plans ensure that strategies for housing and employment set out in their plans are integrated and take full account of relevant market and economic signals. Not to include the City Deal requirements would be a failure to meet this requirement.

If the City Deal housing requirements are added to the Government OAN figures the housing requirement for the period 2017-2036 should be as follows:

Government OAN figure 2017-2036:	38,988
Minus commitments of:	35,665
Sub Total:	3,323

Plus, City Deal Housing Requirement from 2017 SHMA (SHMA fig:101)	8,361
Subtotal:	11,684
Plus 20% buffer (see qu6 reasoning below):	2337
TOTAL HOUSING REQUIREMENT (2017-2036):	14,021

We consider that the up to date Strategic Housing Market Assessment June 2017 figures for the calculation of the housing requirement should be used until the Government's methodology is formally put into practice. The SHMA sets out a Policy -on full objectively assessed need for housing for the period 2015-36 for the Greater Norwich Area of 44,714 **including** the City Deal housing requirement (Figure 96: Central Norfolk Strategic Housing Market Assessment 2017). This would indicate a residual requirement of 10,859 homes 2015-2036 taking into account a 20% buffer:

Policy-on SHMA OAN figure including City Deal:	44,714
Minus commitments of:	35,665
Subtotal:	9,049
Plus 20% buffer (see qu6 reasoning):	1810
TOTAL HOUSING REQUIREMENT (2015-2036):	10,859

Paragraph 5.7 of the SHMA states:

" We would note that in the Central Norfolk SHMA 2015, the potential impact of the City Deal was considered part of the OAN, but greater clarity now indicates that it is an

aspirational jobs target which **should be treated as part of the housing requirement** (our emphasis), not the OAN.”

It is important that the City Deal requirements are not ignored and are included in the final housing requirement figure as they have already been committed to and will contribute to the Greater Norwich and wider economy. This should be the case whether the Government or SHMA OAN methodology is used.

Both scenarios suggest that the housing requirement to 2036 should be significantly **higher** than the 7200 homes specified in the Growth Options Document and a figure in the range of 11,000 to 14,000 would be more appropriate.

We note that the Growth Options Document is unclear about the proposed base date of the plan and we consider that clarity on this is required once the OAN methodology is confirmed. Rebasing the start date of the Local Plan to 2017, should not be used as an excuse to reduce previous backlog. Both above methodologies are set to different plan start dates, but both are intended to take into account previous backlog in assessing the housing requirement going forward.

We also consider that the deliverability of some of the existing 35,665 commitments may be questionable and further consideration should be given to this to ensure that it is a robust figure to use in the calculation of the housing requirement.

5. Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?

The figure of 7200 homes is considered to be too low for the reasons set out above and because a 10% delivery buffer is too low. This is particularly the case bearing in mind the track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current Joint Core Strategy. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area. Whichever of the 6 growth options, or variations on them is finally chosen, it is likely that the vast majority of housing will be allocated in locations in and around Norwich because this is a sustainable model for future growth. All of the growth options show over 70% of housing to be located within the Norwich Policy Area. We consider that in order to ensure competition and choice in the availability of housing land and reduce the future likelihood of lack of 5-year supply, a 20% buffer should be added to the OAN figures for the purposes of calculating the housing requirement. Windfalls should not be relied upon to make up any shortfalls. (see question 6 for more information).

6. Do you agree that windfall development should be in addition to the 7,200 homes?

Paragraph 4.24 of the plan states that “based upon current trends and projected future delivery, it is estimated that an additional supply of up to 5,600 dwellings could be provided during the plan period on “**windfall**” sites. This is likely to be an over estimate. Recent trends have been very much influenced by the lack of 5-year housing land supply within the Norwich Policy Area. If during the new plan period there is no longer a shortage of 5-year land supply, then the amount of delivery on windfall sites will be significantly reduced. Windfall development in recent years has also been dependent upon the availability of unallocated brownfield sites within the city and other towns becoming available. Due to the emphasis on brownfield development in recent years it is considered that the availability of this source of windfall is also likely to be reduced during the future plan period. There should not be any reliance placed upon significant amounts of windfall coming forward within the plan period to deliver the required housing numbers. Windfall should be in addition to the final housing requirement number chosen.

Delivering Infrastructure

7. Are there any infrastructure requirements needed to support the overall scale of growth?

Inevitably with any significant housing and employment growth there will be supporting infrastructure requirements. It is essential that these are properly planned for at the outset. There is a need for investment particularly on key infrastructure. The opening of the NDR will help to facilitate growth to the east and north of the city. It is also likely that improvements will be required to A47 southern bypass junctions, e.g. Thickthorn, Longwater to ensure sufficient capacity. Opportunities for better public transport linkages including rail and bus also need to be properly considered.

We also consider that it is essential that healthcare requirements are properly assessed and planned for at an early stage. This requires proper engagement with, and input to, the process of plan making from the NHS to ensure that health facilities are not left over to be provided on a site by site basis. This only serves to fuel local opposition to new development. We consider that, where appropriate, there should be a commitment towards using New Homes Bonus generated by new developments to help fund Healthcare facilities where there may be funding shortfalls. Furthermore, specific healthcare priorities should be identified for funding through the Greater Norwich Growth Programme (Infrastructure Plan) funded by CIL.

We consider that relocation of the existing Mulbarton Doctor’s Surgery to larger purpose-built premises within land identified as part of our Mulbarton site submission should be one such priority. Capacity at the surgery is already stretched for the existing community and there is limited scope for expansion on its existing site because of its constrained location. The proximity of the surgery to the school adds to congestion and vehicle conflict. There were previously plans

for the surgery to move to a new site as part of the Hopkins development at Mulbarton, but this did not happen due to funding constraints. There is still an ongoing issue with insufficient funding availability to enable the surgery to move to a new site. Glavenhill Strategic Land are willing to provide the site at nil cost to enable this to happen, but there will be a need for additional funding and this should be planned for now. Mulbarton is an obvious location for the accommodation of additional housing due to its favourable location close to jobs and higher order services in Norwich. Strategic decisions to enable this to happen in a satisfactory manner supported by good infrastructure are essential.

How should Greater Norwich grow?

Existing Housing Commitment

8. Is there any evidence that the existing housing commitment will not be delivered by 2036?

The existing housing commitment, which comprises allocations in the Joint Core Strategy (JCS) and sites with planning permission, is substantial at 35,665 homes. There has been a track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current JCS. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area. Although at this stage we are not aware of any hard evidence that the commitment will not be delivered by 2036, we do believe that it should be treated with caution and it is therefore essential that an adequate buffer is added to the housing requirement figure in order to mitigate both under delivery of the commitment and of new allocations.

The Growth Options (options on pg.39-40)

9. Which alternative or alternatives do you favour?

Glavenhill Strategic Land broadly supports Option 3 'Supporting the Cambridge to Norwich Hi-Tech Corridor' with some variations. These variations relate to the overall level of housing proposed, which we consider should be within the region of 11,000 – 14,000 new homes rather than the 7200 set out within the Growth Options Document. The reasons for the additional requirement are set out in our answers to questions 4-6 above.

In order to accommodate the additional numbers, Growth Option 3 should be amended as follows:

- Provision of circa – 2000 units to a new settlement within the plan period (more to follow post 2036)
- Allocation of additional brownfield sites within Norwich City if available options can be identified.

- Allocation of additional no's (circa 1000 units) to the north-east on smaller sites to provide short term delivery in this area to supplement larger growth triangle sites where delivery rates have been slow to date and to help provide City Deal housing requirement in association with employment growth around the airport.
- Any remaining requirement to be split proportionally between other locations identified under option 3.

The reasons why we consider Option 3 'Supporting the Cambridge to Norwich Hi-Tech Corridor' (as amended) to be the best option for future growth to 2036 are as follows:

1. This option would ensure that the proposed housing growth is closely aligned with the ambitions of the New Anglia LEP Strategic Economic Plan which aims to deliver economic growth in identified Growth locations including Greater Norwich to build on the City Deal and within the A11 corridor. These locations are identified in the Strategic Economic Plan because they host high impact sector activity and are expected to grow over the plan period. There is a recognition within the plan that *"the northern part of the corridor has strong potential to develop its advanced manufacturing sector with a focus on Hethel Science and Technology Park and Snetterton."*

The Growth Options document recognises that *"The A11 corridor is a major focus of growth, with the route providing key strategic access to London, Cambridge and much of the rest of the UK. The Cambridge-Norwich Tech corridor initiative aims to boost economic development"*. The document sets an indicative target to provide around 45,000 jobs 2015 -2036 (para 4.12 of Growth Options Document) and proposes that the Greater Norwich Local Plan should aim to deliver forecast jobs growth plus additional growth which is consistent with evidence and the City Deal agreement with Government. Option 3 will provide the best support to enable the jobs potential of the Hi-Tech corridor to be realised in addition to jobs growth associated with the city centre, NRP and airport.

2. Option 3 provides the opportunity to focus significant growth in an area which could effectively create an extension of the Cambridge, Milton Keynes, Oxford corridor, which will be the subject of significant investment. In order to compete effectively with and benefit from the Cambridge regional growth, this option is essential.
3. Growth Options 1-3 have been scored the same within the Interim Sustainability Appraisal and perform significantly better in sustainability terms than options 4 -6. Options 4-6 should be discounted as least sustainable. The provision of adequate infrastructure and services to support new housing is extremely difficult under dispersal options and the increased level of public opposition to numerous dispersed sites that may not be properly served by infrastructure and services should not be under-estimated. This is not to say that there should be no dispersal, however. Where smaller sites in towns and villages can

bring community benefit such as at Mulbarton, or help the viability of existing services and facilities, this should be supported. We consider that option 3 provides the right level of dispersal without making this the focus of the growth strategy.

4. There are some similarities between option 2 (Transport corridors) and Option 3 (supporting the Cambridge to Norwich Hi-Tech corridor) as both are focused upon Transport routes. There are, however, significant advantages in choosing option 3 over option 2 as it would enable housing development and investment to be focussed in a core area that has the potential to generate significant employment in line with the Strategic Economic Plan objectives. This is a sustainable approach because it provides homes close to where the jobs will be created. This area also has the potential to benefit from funding sources through the LEP and Central Government to help deliver the Strategic Economic Plan objectives for the High-Tech corridor. Putting more development in other transport corridors as proposed under option 2 would disperse development further, would be unlikely to benefit from the same funding streams and has less potential for job creation and contribution to the local economy. There is also a danger that locating housing on key transport corridors will only add to existing commuting into Norwich, where the majority of employment opportunities are located. A new settlement within the Hi-Tech corridor under option 3 can provide new homes close to new jobs and enable a planned approach towards infrastructure provision linking into various funding streams.

Option 1, (concentration close to Norwich) obviously scores well in sustainability terms but is very much a repeat of the existing Joint Core Strategy. There have been significant issues with delivery of the JCS numbers, particularly in certain areas and a repeat of this is not a desirable outcome. To accommodate the majority of the required housing numbers within an option 1 scenario would require significant additional pressure being placed upon Norwich Policy Area towns and villages, and the urban fringe, that are already experiencing high levels of growth under the JCS. As our evidence suggests that in the region of 11,000-14,000 new homes are required rather than the 7200 specified in the Growth Options Document, there is a need to find sites for significantly more homes than currently presented under this option. Although there may be scope to find some more suitable brownfield sites within Norwich, it is not considered that there is sufficient capacity under this option to accommodate all of the growth requirement without having an adverse impact upon the character of fringe settlements, as well as increased pressure on infrastructure and services.

The additional benefit of Option 3 is that as well as directing significant growth to a corridor that can bring valuable benefits in terms of Hi -Tech job creation, the development of a new settlement based upon garden village principles will have less

impact upon existing towns and villages than too many bolt on urban extensions that do not always provide the required level of infrastructure and facilities.

5. We consider that the 11,000-14000 homes required would be best accommodated by growth Option 3 that provides for a new settlement in the right location to help deliver on economic growth objectives as well as providing a sustainable level of additional growth to Norwich, its fringe settlements and other main towns and villages.
6. We understand that there may be some nervousness regarding the ability to realise the delivery of a new settlement to garden village principles under this Growth Option bearing in mind that this would be a new approach in this area. However, we believe an ambitious strategy is necessary to ensure a prosperous future for the area, which also respects the key characteristics of Greater Norwich. Promotion of a new settlement offers a high level of local authority engagement in the development process to ensure that there is the correct framework in place for long term investment for required infrastructure and to ensure that the completed development is vested with the local community and there is sufficient long-term income flow to ensure long-term stewardship. We believe that this is a deliverable model.
7. Our site-specific representation in support of a new settlement based upon Garden Village principles at Hethel in the Cambridge to Norwich Hi-Tech corridor provides additional evidence which supports Option 3 as the most appropriate Growth Option and should be read in conjunction with the answer to this question.

10. Do you know of any infrastructure constraints associated with any of the growth options?

As set out in our answer to Question 7 inevitably with any significant housing and employment growth there will be supporting infrastructure requirements. It is essential that these are properly planned for at the outset.

When reviewing the 6 growth options, the delivery of infrastructure by dispersal options becomes difficult. We believe that dispersal Options 4,5 and 6 provide significantly more constraints than Options 1-3.

We consider that Option 3 which includes a new settlement in the Hi-Tech corridor provides infrastructure opportunities. By planning at scale, there is an opportunity to not only provide high quality housing, long term stewardship and land value capture, but also to understand the needs of the wider local area, which through a Development Corporation or local development agreement, can mean that the local authority is at the heart of the development process, providing leadership, but also reassurance around delivery. New settlements can ensure a range

of local facilities and infrastructure, for example, this could lead to the provision of new and improved school provision, including a new High School which could serve the new settlement and Wymondham, and also grasp the opportunity for Further Education.

Planning at scale by way of new settlements enables long term funding streams to provide infrastructure needed for the occupants and the wider area. This can be linked with existing employment centres.

For other sites within Greater Norwich, it is essential that infrastructure requirements are considered at this early stage and that appropriate funding is directed to development in the right locations to enable the required infrastructure to be provided. See also our related answer to Question 7.

11. Are there any other strategic growth options that should be considered?

12. Do you support the long-term development of a new settlement or settlements?

Green Belt

13. Do you support the establishment of a Green Belt? If you do, what are the relevant “exceptional circumstances”, which areas should be included, and which areas should be identified for growth up to and beyond 2036?

We do not support the establishment of a Green Belt. This would only serve to push the required housing numbers further into the countryside in order to achieve a protected area around Norwich. This would be unsustainable because it would increase the length and number of journeys into the city and would be likely to have a greater environmental impact on countryside locations.

Norwich City Centre Defining the City Centre Area

14. Should the area defined as the city centre be extended?

Strategic City Centre Policy

15. Do you support the approach to strategic planning for the city centre in 4.80 above?

City Centre Offices

16. What should the plan do to reduce office losses and promote new office development in the city centre?

Retailing
17. What should the plan do to promote retailing in the city centre?
Leisure and Late Night Activity Zone
18. Should the focus for late night activities remain at Riverside, Prince of Wales Road, and Tombland, or should a more flexible approach be taken?
City Centre Housing
19. What should the plan do to promote housing development in the city centre?
Cultural, Visitor and Education Facilities
20. How can the plan best support cultural, visitor and educational uses in the city centre?
Remainder of the Norwich Urban Area and the Fringe Parishes
21. Do you support Option UA1 for the remainder of the urban area and the fringe parishes?
Main Towns
22. Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?
Settlement Hierarchy
23. Do you agree with the approach to the top three tiers of the hierarchy?
Yes, this is supported.
24. Do you favour option SH1, and are the villages shown in appendix 3 correctly placed?
25. Do you favour the Village Cluster approach in option SH2?
25a. What criteria should be used to define groups?
25b. Which specific villages could form groups?

25c.How could growth be allocated between villages within a group?
The Influence of the Norwich Urban Area
26.Do you support a Norwich centred policy area and, if so, why and on what boundaries?
Section 6 – Topic Policies The Economy The Supply of Employment Land
27.What option or options do you support? (refers to options on pg.71-2)
28.Which allocated or existing employment sites should be identified as strategic sites and protected?
29.Are there employment areas that should be identified as suitable for release for residential uses?
30.Are there any new employment sites that should be allocated?
Accommodating Expenditure Growth
31.Should the position of any of the centres in the retail hierarchy be changed?
32.Do any of the existing retail centres have scope to expand to accommodate further floorspace?
The Rural Economy
33.What measures could the GNLP introduce to boost the rural economy?
Access and Transportation Strategic Transport Issues
34.Are there any other specific strategic transport improvements the GNLP should support?

Promoting Healthier Lifestyles, Sustainable Travel Choices and Greater Accessibility to Broadband
35. Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area?
Design Options
36. What approach do you support for promoting good design of new development?
Housing Minimum Affordable Housing Threshold
37. Which approach to affordable housing thresholds do you prefer?
Application of Affordable Housing Percentage Requirements on Sites
38. What approach do you favour for affordable housing percentages? (refers to options on pg.87)
Tenure Split for Affordable Housing
39. Do you support the favoured option for tenure split?
Rural Windfall, Exception Sites and Small Sites
40. Which approach do you think should be taken to rural windfall and exceptions sites? (refers to options on pg.89-90)
Housing Mix – Relative Ratios of House Sizes by Bedrooms
41. Which approach to the mix of housing do you support? (refers to options on pg.92)
Housing with Care, Extra-Care Housing and Retirement Housing
42. Which approach or approaches to housing for older people and care accommodation do you favour?
Houseboats

43. Which of the reasonable alternatives for houseboats do you favour?
Gypsies and Travellers
44. Which policy approach do you favour to planning for the needs of Gypsies and Travellers?
45. Are there any suitable sites for Gypsy and Traveller accommodation you wish to submit?
Travelling Showpeople
46. Do you support the favoured option for planning for the needs of Travelling Showpeople?
47. Are there any suitable sites for Travelling Showpeople accommodation you wish to submit?
Residential Caravans/Park Homes
48. Do you support the favoured option for residential caravans and park homes?
49. Are there any potential locations for new/expanded residential caravan sites that you wish to propose?
<i>Climate Change</i>
50. Do you support the favoured option for climate change policy?
<i>Air Quality</i>
How Should Air Quality be Covered in the GNLP?
51. Which approach do you favour for air quality? (refers to options on pg.104-5)
<i>Flooding</i>
How Should Flooding and Flood Risk be Covered in the GNLP?
52. Do you support the favoured option for flood risk policy?
<i>Nature Conservation, Green Infrastructure and Habitats Regulation Assessment Mitigation</i>

How Should Nature Conservation and Green Infrastructure be Covered in the GNLP?
53. Which option do you support? (refers to options on pg.111)
54. Do you think any changes should be made to the Green Infrastructure network?
Landscape Landscape Character and Protection
55. Which of these options do you favour? (refers to options on pg.115)
Strategic Gaps
56. Should the GNLP protect additional Strategic Gaps and if so where should these be?
Energy
57. Should option EN1 be included in the GNLP?
Water
58. Do you support option W1?
Communities Location of Affordable Housing within Sites
59. Do you support option COM1 for the distribution of affordable housing?
Health Impact Assessments
60. Which option do you support? (refers to options on pg.123)
Neighbourhood Planning
61. Do you support option NP1? If so, which GNLP policies should be “strategic”?
Culture

How Should Culture be Covered in the GNLP?
62. Which option do you support? (refers to options on pg.126-7)
<i>The Broads</i>
63. Do you support option BR1?
<i>Section 7 – Monitoring the Plan</i> Monitoring of the GNLP
64. Are there any current indicators that should be excluded or included in the GNLP monitoring framework?
Shortfall in Housing Land Supply
<p>65. Which option do you support? (refers to options on pg.131-2)</p> <p>Glavenhill Strategic Land note the policy Option HLS1 to allow the most appropriate HELAA sites to come forward if there were no 5-year land supply. We are concerned that this approach will be difficult to put into practice. If this approach is taken it will presumably be based upon the development hierarchy but how will locations be prioritised between South Norfolk and Broadland in particular? The level of assessment of HELAA sites is minimal and the onus is on the Councils to undertake this rather than the landowner/developer. It will be difficult to prioritise sites based on limited assessment information, in locations where there are multiple sites available. How will this process be undertaken in a fair and transparent way outside of the Local Plan process? It is therefore questionable whether this approach would actually provide a simpler and quicker process than Option HLS2.</p> <p>We consider that Option HLS2 requiring a short, focussed review of the local plan to allocate more deliverable sites is the only reasonable approach because it is fair and transparent. This also places the onus upon the promoter to provide evidence regarding site suitability and delivery. The need for such a review should be kept under continuous review based upon annual monitoring reports. This was the approach recommended by the Inspector in relation to housing shortfall in the Broadland part of the NPA for the JCS and JCS policy 22 was put in place for this purpose, although it is noted this has not been implemented.</p> <p>Continuing to allow planning permissions on a 5-year land supply basis until the short focussed review has been completed is a reasonable approach and if an appropriate buffer is added to the</p>

housing requirement figure during plan preparation (see our response to question 5), then the likelihood of there being insufficient 5 year housing land supply should be minimal in any case.

General Questions

66. Are there any other issues relating to the GNLP you would like to raise?

6. Site Assessment

The HELAA capacity assessment December 2017 has assessed the suitability and availability of sites for residential development in broad terms by means of a desk top assessment and advice from a range of technical consultees. It identifies potential constraints to development and/or impacts of developing a site which may need further investigation and additional measures to facilitate development e.g. additional infrastructure or mitigation.

Glavenhill has updated the indicative site layout submitted at the Call for Sites stage in response to more detailed technical assessments, the details of which are set out in the following paragraphs. These have enabled us to draw more detailed conclusions on the suitability of this site and a comparison with the HELAA assessment is set out below:

Constraints Analysis	HELAA Assessment	Glavenhill Assessment
Access	Amber	Green
Accessibility to Services	Green	Green
Utilities Capacity	Amber	Green
Utilities Infrastructure	Green	Green
Contamination and Ground Stability	Green	Green
Flood Risk	Amber	Green
Market Attractiveness	Green	Green
Impacts Analysis		
Significant Landscapes	Green	Green
Townscapes	Amber	Green
Biodiversity and Geo-diversity	Amber	Green
Historic Environment	Amber	Green
Open space and GI	Green	Green
Transport and Roads	Amber	Green
Compatibility with Neighbouring uses.	Green	Green

Access

Satisfactory access to the site can be achieved as shown on the drawing at Figure 3. A Safety Audit of this scheme has been undertaken to ensure that it works. A pedestrian link will also be provided from the existing footpath through the Church yard into the south of the site to ensure

good permeability. The existing footway from the Church towards the junction to the school can also be upgraded.

Accessibility to Services

Mulbarton is a Service Village with a good range of existing services. The proposed footway link through the Church yard into the southern end of the site will enable new residents a safe and direct route to the Common and existing services in the village including the school. In addition, if the Doctor's surgery relocates to the site, it will enable residents within the existing village to walk there via a safe route.

Utilities Infrastructure and Capacity

The HELAA assessment of the site indicates that there are no constraints in terms of utilities infrastructure. We are not aware of any constraints that would prevent this site from being connected to existing infrastructure e.g. water, foul drainage, electricity.

A Utilities Assessment has been carried out by Rossi Long Consulting on behalf of Glavenhill Strategic Land which concludes that there is capacity to accommodate the proposed scale of development.

Contamination and Ground Stability

A Phase 1 Geo-Environmental Assessment has been made of the site, located off Norwich Road north of Mulbarton Common. The assessment consists of a desk study to investigate the history and environmental setting of the site along with a site walkover to record pertinent features.

The information gathered as part of the desk study and site walkover has been amalgamated, forming the basis of the Conceptual Site Model (CSM) in which potential pollutant linkages have been explored.

The CSM shows that there is a low probability that contamination exists across the site with a possibility of isolated hotspots, that there are potentially sensitive receptors, and that suitable pathways may exist to link these receptors to the source of the contamination (hotspots). In this case it is likely that a limited scheme of soil or geotechnical investigations will be recommended across the site and, if necessary, a Phase 2 qualitative risk assessment of identified risks.

Therefore, Rossi Long Consulting deems the overall risk rating of the site in terms of contaminated land to be **LOW**. To put this in context there are four potential risk ratings as set out in Table 8.1 of the accompanying report.

The BGS mapping shows the site to be underlain by Undifferentiated Chalk bedrock at depth, with superficial deposits of Lowestoft Formation - Diamicton. The anticipated soils should be suitable for traditional spread foundations for residential low rise construction with potential deepening around existing and proposed trees and hedgerows. A geotechnical investigation and testing will

be required to determine the actual ground conditions. The overall risk rating for the site in terms of foundation complexity is given as **LOW**.

Flood Risk and Drainage

A Flood Risk Assessment has been undertaken by Rossi Long Consulting Engineers. From examination of site levels and by reference to Environment Agency flood zone mapping, it is demonstrated that the site is situated in Flood Zone 1. This is a low probability flood zone with a less than 1 in 1000 annual probability of flooding. The site is at 'low' risk of flooding from rivers.

All flood risk sources have been considered in Section 6 and the risk of flooding from all sources is generally 'very low'. An area of 'high' risk surface water flooding has been identified at the north end of the site and this area has been reserved for open space and sustainable drainage systems.

A sustainable approach to surface water run-off is proposed following the hierarchy of drainage options, and all run-off will discharge to an infiltration lagoon to be sited at the north end of the site.

This strategy complies with the requirements of Planning Policy and provides a sustainable approach to surface water management. Flood Risk does not present a constraint to the proposed development of this site.

Market Attractiveness

Glavenhill's own research suggests that a site of this scale in this location will be attractive to the market due to its good location within a Service Centre with easy access into Norwich City Centre and employment opportunities at the NRP and Hethel Innovation Centre.

Significant Landscapes

There are no national or local landscape designations within the site.

A Landscape and Visual Impact Assessment has been undertaken by Liz Lake Associates. The visual impact of the development upon the character of the existing village is not considered to be significant because the site is largely well screened to the rear of existing properties on Norwich Road and Saint Omer Close. It will not be visible when viewed from The Common or Churchyard as it is located to the north of the Churchyard, well screened by existing vegetation.

The approach to the village from the north will be altered by the introduction of a roundabout, but the open views across the field to the front of Paddock Farm and east of Norwich Road will be retained, as no development is proposed here, with the exception of a small farmstead scale development immediately adjacent to the existing veterinary surgery. This farmstead scale and form of development, with buildings fronting the road is characteristic of the local area. The visual impact of the roundabout must be balanced against the benefits it will bring in terms of helping to reduce traffic speeds on the approach into the village and Conservation Area and the

other benefits of the scheme including delivery of a new doctor's surgery site and extension to the burial ground.

The landscape strategy for the site includes supplementing the 'Important Hedgerow' which runs on a north south axis through the northern part of the site, by extending the woodland character from the western part of the site up into the 'Northern Common' area. This helps to mitigate views from Paddock Farm as well as bringing more of the landscape character of The Common up to this northerly part. Additional tree planting is proposed in a parkland style layout across the new 'Northern Common' and green spaces to enhance the landscape character of the site in the context of the wider area.

The eastern edge of the development will adjoin open countryside but will be partially screened by both existing and proposed hedging and landscaping. The masterplan layout has been designed to ensure that buildings do not form a solid edge of development when viewed from the east. Densities are lower along this boundary and houses have been positioned to create as soft an edge as possible. Significant landscapes do not, therefore, present a constraint to development of this site.

Townscapes

The proposed site is considered to be acceptable in terms of its impact upon the built form of the village. It will extend the village northwards, but this is in accordance with the Mulbarton Neighbourhood Plan which seeks to prevent further southward development of the village and indicates that development to the north will be acceptable subject to other policy requirements.

The site will provide a new northern Common at the entrance to the village which will be an attractive feature on the entrance to the village. The proposed roundabout will help to slow down traffic entering the village which will be to the benefit of the existing Conservation Area.

Biodiversity and Geodiversity

An ecology survey of the site has concluded that there are no major constraints to development. The closest statutory ecological designation is Dunston Common LNR situated approximately 3km to the east of the site. The site is dominated by fields under arable cultivation supporting limited ecological value. The survey recommended that the habitats of some value within the context of the site, namely the woodland, hedgerows, ponds, rough grassland, tall ruderals and scrub be retained, and consideration be given to the presence of protected species.

A number of opportunities to enhance the ecology of the site are available which have the potential to lead to net gains for biodiversity as part of any sensitively designed scheme.

Biodiversity improvements could include:

- creation and enhancement of aquatic habitat and terrestrial habitat for amphibians;
- new wildflower grassland habitat for reptiles and hedgehogs;

- additional tree and hedgerow planting to benefit birds;
- introduction of bird and bat boxes.

Historic Environment

A Desk Top Archaeological assessment of the site has been undertaken and geo-physical survey of the site is currently underway. The results of this can be provided in due course. However, initial results indicate that archaeology does not present an overriding constraint to development.

A Heritage Impact Assessment of the proposals has been undertaken. This has been an iterative process, and heritage advice has been taken throughout the process of preparing the masterplan in order to inform the layout. The following section provides a synopsis of the Heritage Assessment conclusions, which have been considered accordingly with relevant policy to provide a measured assessment of heritage issues.

In terms of heritage impacts, there are 15 listed buildings within the vicinity of the site. Not all are considered sensitive to development on the site as it does not form part of their setting owing to their distance from the site, topography, intervening vegetation and buildings.

The study site abuts part of the north and east boundary of the Mulbarton Conservation Area. This Conservation Area was designated in 1977 and extended in 1994. A Draft Conservation Area Character Appraisal and Management Guidelines was published by South Norfolk Council in July 2017.

There are no other designated heritage assets (i.e. Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields or World Heritage Sites) within the study or search area.

JCS policy 1 states that:

“The built environment, heritage assets and wider historic environment will be conserved and enhanced through the protection of buildings and structures which contribute to their setting, the protection of their setting...”

Policy DM 4.10 states that *“all development proposals must have regard to the historic environment and take account of the contribution which heritage assets make to the significance of an area and its sense of place”* and echoes NPPF paragraph 134 in that Less than substantial harm will only be justified where there are public benefits that outweigh the harm.

It is therefore considered that the potential impact upon the historic built environment would be restricted to any changes in the settings of part of the Mulbarton Conservation Area and a limited number of listed buildings, the Grade II* Church of St Mary Magdalen and the Grade II Paddock Farmhouse and Paddock Farm Barn specifically.

Policy ENV1 states that *“all development proposals within or adjacent to the Conservation Area and other designated heritage assets... should... include any proposed mitigation measures, as well*

as how the proposed development will contribute to the character and setting of the relevant heritage asset(s).”

The Conservation Area encompasses the historic core of Mulbarton located to the north and north-east tip of the Common. It also includes the wider triangular expanse of the Common, and historic buildings located on the western, southern and eastern peripheries of the Common. The Appraisal summarises the key characteristics of the Conservation Area as: strong rural setting; large common with triangle of roads dominates conservation area; three main ‘gateways’; mature tree and hedgerows prominent in many important views; Medieval Church is a key feature in views across the common; large pond is a key feature of the main part of the village north of the church; majority of buildings are the modest size houses with few exceptions.

Historic England and the NPPF define ‘setting’ as the surroundings in which a heritage asset is ‘experienced’. The Appraisal identifies the ‘setting’ of Mulbarton Conservation Area as comprising the large area of 20th century housing to the immediate south of the Conservation Area, and the north, east and west sides of the Area having stronger links with the open countryside.

Paddock Farm is located within the northern part of the Conservation Area. The Farmhouse is Grade II listed and dates from the late 17th century. The barn located to the north of Paddock Farmhouse is also Grade II listed and dates from the late 18th century. As an ensemble, they are immediately recognisable as a historic farmstead. The wider setting of Paddock farm includes the agricultural fields around the ensemble. The Appraisal also recognises its relative separation from the built-up part of the village.

The proposed development will result in built form to the north-east of Mulbarton Conservation Area and Paddock Farm. However, the area to the immediate north of Mulbarton Conservation Area and Paddock Farm and barn will remain relatively undeveloped. There is the potential for 9.81 ha of green infrastructure to be provided north of Paddock Farm as indicated on the Indicative layout plan.

The north-east part of the site is proposed for residential development. However, cognisant of the setting of Paddock Farm and barn, no residential development has been located in the field directly in front of the Farmhouse. This will be retained as an open space buffer with the new housing development positioned beyond the existing important north-south hedgerow which will be retained and supplemented with additional structural landscaping to extend the woodland character from the western part of the site up into this ‘Northern Common’ area. This helps to provide additional mitigation to views from Paddock Farm as well as bringing more of the landscape character of The Common in the centre of the village up to this more northerly part. New tree-planting in a parkland style layout across the new ‘Northern Common’ and other proposed green spaces is proposed to help enhance the landscape character of the site in the context of the wider area. Reflecting NP Policy ENV 1, this creation of recreational space takes into account the historic fabric of the area where Mulbarton developed around the Common, which the Appraisal recognises.

The proposed masterplan layout minimises harm by preserving the setting of Paddock Farm, recognising its significance, in line with JCS policy 1 and Policy DM 4.10. Therefore, the proposed development will result in less than substantial harm to the significance of the Mulbarton Conservation Area and the constituent listed buildings in this part of the Conservation Area – Paddock Farm and barn.

The Appraisal notes that the settlement is not visible along the road on approach towards Paddock Farm. However, the tower of the Church of St Mary Magdalen is visible above the treeline on this approach. This initial glimpse of the Conservation Area will remain legible as the area to the immediate east of Paddock Farm will remain undeveloped, thus allowing for long views south on the approach to Mulbarton from Norwich Road.

The Church of St Mary Magdalen is Grade II* listed and dates from the 14th century with significant 19th century alterations. The Draft Appraisal notes that some of the most important views of the church are obtained from the Common. These views place the church in the context of the historic settlement of Mulbarton and its constituent listed buildings which narrate the historic development and evolution of the settlement along the Common. These important visual relationships and historical juxtapositions will not be harmed by the proposed development as it is located outside of this context.

There is a public footpath running from the south of the church which leads to the south part of the proposed development site. Cartographic evidence suggests that this footpath was not established until the latter half of the 19th century. The proposed development will see the southern section of this footpath improved, thus facilitating greater public access to the countryside beyond.

Overall, any harm to the significance of the heritage assets namely, Mulbarton Conservation Area and the listed buildings considered sensitive to development – Paddock Farm and barn and the Church of St Mary Magdalen, is considered to fall within the ‘less than substantial’ threshold set out in paragraph 134 of the NPPF.

The public benefits provided by the proposed development, which have been discussed earlier and which include a significant contribution to delivery of housing in an area of undersupply, provision of a new roundabout which will help slow down traffic on the approach to the village and Conservation Area, provision of a site for a new Doctor’s Surgery to serve the village and provision of land for an extension to the burial ground, are considered to outweigh the less than substantial harm to the significance of Paddock Farm as a heritage asset. It is concluded that the site is suitable for allocation for the proposed development in accordance with paragraphs 132 and 134 of the NPPF and local plan policy DM4.10.

Open Space and GI

The indicative site plan shows open space areas to serve the development including a new northern Common at the entrance to the village. These are in excess of the policy requirements for a site of this size. An additional 9.81ha of green infrastructure to serve wider deficiencies

within the area could also be provided to the north of Norwich Road at the entrance to the village. This is also indicated on the plan. An extension to the burial ground for the adjacent Church is also proposed. Provision of open space and green infrastructure does not present a constraint to development of this site and the site could provide significant benefits to green infrastructure provision for the area.

Transport and Roads

There are no significant constraints in respect of transport and roads. Placing the site access to the north of the village will help to ensure that additional trips through the village are minimised. Pedestrian access through the churchyard and directly into the south of the site will be provided. Upgrading of the existing footway along the Common providing a route to school is also possible if required. There is a regular peak-time bus service to and from the City of Norwich. This is served by First Bus Purple Line number 37/37B and Anglian Bus number 10A. The nearest bus stops to the site are approximately 170m to the south.

Compatibility of neighbouring uses

The site is bordered on two sides by residential properties and the Church. With regard to residential amenity, there are good separation distances between proposed dwellings and existing dwellings such as those on Saint Omer Close and those along the B1113. It is not considered that the proposals will adversely affect the amenity of these properties.

Conclusions

Based upon the above site suitability analysis it is considered that this site is **SUITABLE** for development and should be allocated within the Greater Norwich Local Plan.

Competing Sites

One other site to the east of Mulbarton has been put forward for development through the 'call for sites' and has been considered through the HELAA. This is site reference GNLP0315 (130.29 hectares).

Site GNLP0315 does not adjoin the development boundary of the village and is considered to be too large in scale to provide an appropriate scale of allocation for the village. It does not score as well as the Glavenhill Strategic Land site in terms of the HELAA assessment. Its development for housing is likely to have a significant impact upon the character and appearance of the village and would not accord with the policy requirements of the Neighbourhood Plan. Glavenhill site GNLP0496 is therefore considered to be the best choice for site allocation.

7. Conclusions

The Preferred Development Option Plan shows one way in which the site could be developed to accommodate up to 180 dwellings, a site for a new doctor's surgery, burial ground extension and additional 9.81 ha of Green Infrastructure.

The site is in a sustainable location adjacent to the settlement boundary and surrounded by development on two sides. Services and facilities in Mulbarton are within walking distance of the site. Bus services to higher order settlements are also accessible within walking distance. The site is not within an environmentally sensitive location where the NPPF would require development to be restricted. Technical Assessments have demonstrated that the site has the capacity to accommodate the proposed development in an acceptable manner and that impacts can be satisfactorily mitigated.

Clear benefits will arise from this proposal as follows:

- Immediately deliverable site to contribute towards housing supply;
- Delivery of affordable housing in line with Joint Core Strategy policy to help meet the significant under provision in affordable housing;
- Delivery of a site for a new Doctors Surgery to serve the village;
- Provision of land for an extension to the Church Burial Ground;
- Support to local shops and services. Both national and local planning policies seek to retain and enhance the provision of local services in rural areas. The new residents from the development will help to support the viability of local services in Mulbarton and, therefore, aid their continued provision;
- Delivery of new public open space with the ability to provide additional Green Infrastructure to the north of Norwich Road if desirable;
- Delivery of a new roundabout and highway/footway improvements which will help to slow down traffic on the approach into the village;
- Connection into and upgrade of existing pedestrian route through Churchyard to south of site to provide shared footway/cycleway access to the Common and upgrade to footway along The Common;
- Financial contribution towards improving kitchen and toilet facilities at the Church to enable increased community use;
- Provision of dropped kerb crossing point to enable pedestrian access to Farm Shop at Paddock Farm; and,
- Delivery of over £1,187,585 New Homes Bonus over 4 years to Norfolk County Council and South Norfolk Council to use locally. It is considered that this should be used to help facilitate the delivery of the new Doctors Surgery.

Glavenhill Strategic Land consider that this site should be allocated for residential development of up to 180 new homes, accessed from a new roundabout junction on the B1113, together with provision of land for a doctor's surgery and extension of the Church burial ground (and provision of additional green infrastructure land to the north of Norwich Road if considered desirable).

8. Next Steps

Glavenhill Strategic Land would welcome the opportunity to discuss the potential allocation of this site with Greater Norwich Local Plan officers in more detail. We will continue to undertake our own assessment work and will be aiming towards the submission of a planning application shortly.

If you have any further questions with regards to this site, please contact Glavenhill Strategic Land.