



**GNLP Regulation 18 Consultation Response
March 2018**

**Site 2 - Land East of New Road, Hethersett
GNLP0481**

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1. Executive Summary

The proposed allocation site is well located in Hethersett which is within the Norwich Policy Area and within 7 miles of higher order services and employment opportunities in Norwich City Centre and jobs at Norwich Research Park (3 miles). The village has a wide range of facilities, local employment opportunities and a regular peak-time bus service connecting the site with the main population centres of Norwich and Wymondham.

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

The proposed allocation site makes a logical extension to the village to help accommodate future growth and is of appropriate scale for its location and to provide a choice of sites to aid delivery in a village that already has a major strategic housing allocation to the north.

The Preferred Development Option Plan (Figure 2) shows one way in which the site could be developed to accommodate in the region of 50 dwellings and/or a care home, and/or sheltered housing and/or housing with care for the elderly and a 3.14 ha park.

This site could provide a care home and housing with care and be combined with GNLP480 which could provide additional housing with care. The care home on this site would provide the centre and facilities for care provision across the combined sites. Both sites are under the control of Glavenhill Strategic Land.

In addition to general housing need in this area there is also a particular need for care facilities for the elderly in this location due to the aging population and this site could help to serve that particular need.

The site will not have a significant adverse impact upon the character and setting of the village, or the strategic gap between Hethersett and Wymondham as the layout can be designed to address this as set out within the Chris Blandford Associates report.

The site also offers provision of significant green infrastructure to serve both this site and wider green infrastructure deficiencies within the area. There is also the opportunity to combine this site with GNLP481 to enable the provision of a larger Park across the two sites totalling 6.19 ha.

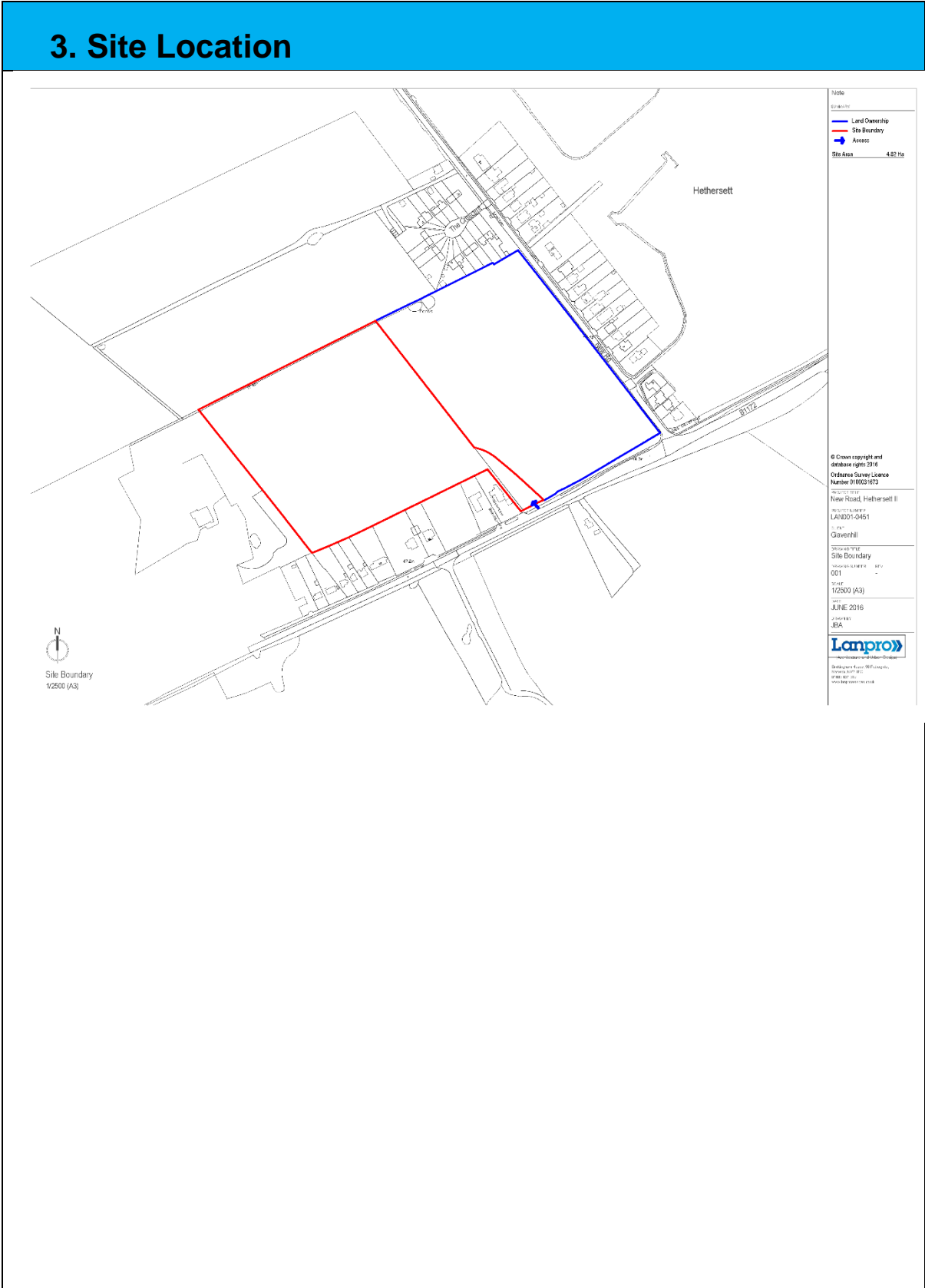
There are no overriding constraints that would prevent this site from being developed and Glavenhill Strategic Land respectfully request that it be allocated in the Greater Norwich Local Plan.

2. Site Introduction and Description

This site is located immediately to the north and east of existing residential properties fronting the B1172. An access point is available from the B1172 with 90m visibility splays in both directions. The site comprises an arable field and extends up to an existing field boundary to the north. To the east is an arable field which borders New Road. This is site GNLP480 and both are under the control of Glavenhill Strategic Land and could be developed together. This 4.82 ha site was previously put forward as a potential allocation to the Call for Sites consultation in July 2016.

There is an existing pavement along the B1172 past the site entrance and providing access via a crossing point to a bus stop on the south side of the B1172 opposite the New Road junction and additional bus stops on New Road. These provide services to Norwich and Wymondham.

3. Site Location



4. Site Opportunities

Hethersett is located within the Norwich Policy Area within 7 miles of Norwich City Centre. It is a designated Key Service Centre within the Joint Core Strategy and contains a wide range of facilities including a primary and secondary school; village hall and community centre; a GP surgery; post office; library; public houses; offices to rent and a variety of extended hours shops and services. There are local employment opportunities and a regular peak-time bus service connecting the site with the main population centres of Norwich and Wymondham. The bus services are First Bus 13A/B/C, 15 and Konect Bus 6/6A. The nearest bus stops are opposite the New Road junction on the B1172 and on New Road. This is, therefore, a sustainable location to accommodate additional homes.

The Preferred Development Option Plan (Figure 2) shows one way in which the site could be developed to accommodate in the region of 50 dwellings and/or a care home, and/or sheltered housing and/or housing with care for the elderly and a 3.14 ha park.

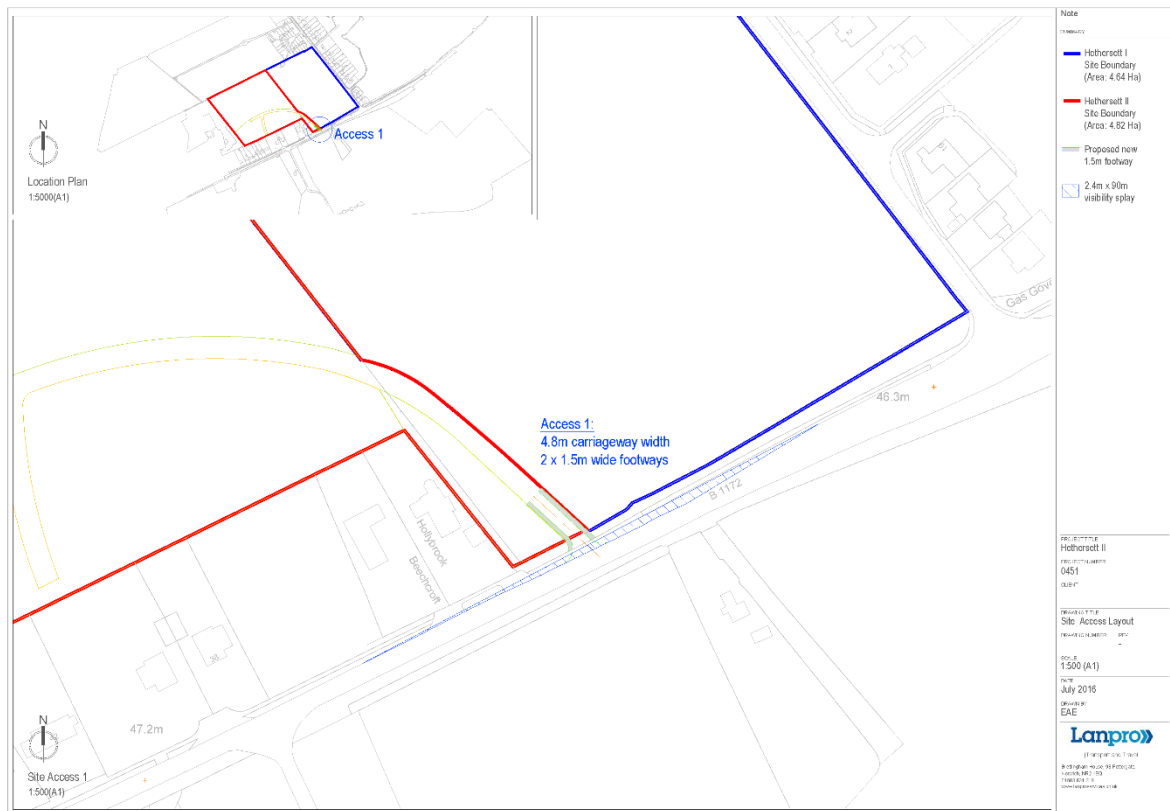


In addition to general housing there is a particular need for care home/housing with care facilities within this area due to the aging population and this site could help to meet that need.

This site could provide a care home and housing with care and be combined with GNL480 which could provide additional housing with care. The carehome on this site would provide the centre and facilities for care provision across the combined sites.

This would also enable the provision of a larger Park across the two sites totalling 6.19 ha which would make a significant contribution to strategic green infrastructure provision to serve the wider population in an area where there are deficiencies.

The site could be accessed from the B1172 and the Indicative Access Arrangements Plan at Figure 3 shows how this could be achieved with 90m visibility splays in both directions.



There are no over-riding constraints that would prevent development of this site as evidenced by the site assessment at Section 6.

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, we 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) and a recognition that new settlements may form a key role in ensuring delivery.

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 11,000-14,000 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 Hethersett 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?

We 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 and we cannot, therefore, understand why it is being used at this point in time.

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.

Government draft OAN figure 2017-2036:	38,988
Minus commitments of:	35,665
Sub Total:	3,323
Plus 10% buffer on 38,988	3899
TOTAL HOUSING REQUIREMENT (2017-2036 as contained within Growth Options Document)	7222

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 draft 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 on sub-total (see qu. 6 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 on sub-total (see qu. 6 reasoning):	1810

TOTAL HOUSING REQUIREMENT (2015-2036):	10,859
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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 also 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.

The East West Rail Consortium, which includes Norfolk County Council and Norwich City Council commissioned Atkins to research the possible impact of an enhanced rail link between Cambridge, Norwich and Ipswich. This concluded that there are economic benefits to be derived from this project, the details of which are now being examined in greater detail. Enhanced links into Cambridge and London, with the return of local rail links, such as in the Wymondham area creates an exciting opportunity for a strategic transport strategy, which will promote growth arising from the A11 route, as well as improved rail, which will support a modal shift.

We also consider that it is essential that healthcare and social services requirements including GP surgeries, care facilities and specialist care 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.

Developing at scale to provide new settlements allows the delivery of essential facilities that not only benefit the occupiers of the new dwellings, but also existing and nearby communities. The receipts that will be generated from the development, will mean that new schools can be built, meeting a need for the surrounding area as part of a comprehensive master plan. This is far more secure than the pooling of planning contributions which often fails to deliver. This will also be the case with countryside environments, health and community facilities and sports and leisure. All of these can be secured as part of a comprehensive plan, which due to the certainty created by the planning system, through some form of development company or corporation, the involvement of long term patient investment and avoiding the most expensive land adjacent to towns and cities, can ensure that these will be provided.

This will also be the case with local transport links and infrastructure, which benefit the wider area, but can also enhance existing infrastructure, such as rail and public transport facilities. They also create an opportunity to provide sufficient quantum of development to support existing employment, create new employment areas and also support training, again for the wider area.

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 putting forward 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?

We broadly support 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 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. There is considerable support for new settlements at a national Government level and 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. This is discussed in our background papers.

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, potentially linked to the Hethel Technology Park.

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.

Dispersal options and even urban growth can link into existing infrastructure, however as set out in our background paper, small development schemes can only provide new facilities and infrastructure through the pooling of contributions, arising from the development of the most expensive real estate. This means that there is often not the scheme viability to make significant contributions and pooling contributions can often be insufficient. They therefore, frequently have limited impact at the local level.

As such, other than meeting specific local needs, dispersal should only be supported for a proportion of the growth, but not the main strategic focus. New settlement planning, can ensure that there is a planned approach for infrastructure, linking into various funding streams and greater control over housing trajectories.

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

Glavenhill Strategic Land support Growth Option 3 with amendments for the reasons set out in our response to Question 9 above. We do not consider that it is necessary to consider any other strategic options.

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 clusters?
25b. Which specific villages could form clusters?
25c. How could growth be allocated between villages within a cluster?
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
Access and Transportation
Strategic Transport Issues

33. Are there any other specific strategic transport improvements the GNLP should support?

Promoting Healthier Lifestyles, Sustainable Travel Choices and Greater Accessibility to Broadband

34. 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

35. What approach do you support for promoting good design of new development?

We consider that Option DE1 to broadly continue with the existing design and density policy approaches with some relatively minor changes and updating is appropriate. This approach will support good design. Setting more prescriptive design and density policies is likely to be difficult to achieve across such a large and diverse area and should be approached with caution. Setting a policy that satisfactorily deals with city centre apartment sites as well as rural infill sites both in terms of density and design may create more problems than it solves. We consider that a broad policy is more appropriate and that individual site allocation policies could set more prescriptive site-specific requirements, backed up by Development Management Policies in each of the Districts and the City.

Housing
Minimum Affordable Housing Threshold

36. Which approach to affordable housing thresholds do you prefer?

We favour option AH2 that requires only affordable housing on sites of 11 or more dwellings in line with current and expected Government guidance. We object to option AH1 for the same reason.

Application of Affordable Housing Percentage Requirements on Sites

37. What approach do you favour for affordable housing percentages? (refers to options on pg.87)

We consider that the simpler the affordable housing policy is, the more likely it is to deliver required affordable provision across the Greater Norwich area and to speed up the planning process by eliminating lengthy negotiations on site viability. The affordable housing target for

Greater Norwich has not been met on annual basis for the past 5 years at least. It would be interesting to know what the average affordable provision has been across all sites greater than 10 units since adoption of the JCS. It is certainly not 33% as per the aim of the JCS policy. It is noted that paragraph 6.8 of the Growth Options Document states that *“seeking less than 27% affordable housing on all sites above the qualifying threshold risks under-delivery of overall affordable housing targets”*, but under delivery of targets is already happening, even with a higher % target. Lowering the target, could actually increase delivery of **all** housing types.

We consider that if a realistic % of circa 20% was set across all sites above the qualifying threshold, it would eliminate the need for viability challenge except in very exceptional circumstances and would give developers the certainty they need to be able to get on and secure planning permissions for schemes at a viable level. This would eliminate significant delay and cost in the planning process associated with lengthy heads of terms and S106 negotiations and would enable developers to get on and deliver the housing on site. At the present time, the affordable housing levels are frequently a major hindrance to securing timely delivery of both private market and affordable housing

Tenure Split for Affordable Housing

38. Do you support the favoured option for tenure split?

We object to a one size fits all tenure split approach. It is considered that tenure split should be considered on a site by site basis depending upon local need and upon what Registered providers want to provide and can fund.

Rural Windfall, Exception Sites and Small Sites

39. Which approach do you think should be taken to rural windfall and exceptions sites? (refers to options on pg.89-90)

We consider that Option AH7 to allow small scale windfall sites adjacent, or close to settlements with development boundaries is appropriate. These sites should be subject to a criteria-based policy to ensure that they are only permitted where they are acceptable in terms of impact on form and character, landscape setting of the village and are immediately adjacent to settlement boundaries. We consider that where such sites are permitted they could provide for a proportion of self-build plots where there is an identified requirement in the location.

Given the sometimes irregular shape of settlement boundaries in villages we would propose that “close to” be incorporated into the policy.

Housing Mix – Relative Ratios of House Sizes by Bedrooms

40. Which approach to the mix of housing do you support? (refers to options on pg.92)

We support option AH10 and object to option AH9 as described on the basis that the market will always dictate housing mix delivery based on a known existing demand in each District. Any attempt to apply a blanket housing mix across the entire GNLP area will only serve to frustrate housing delivery and repeat the mistakes of the past that have resulted in missed housing targets and a rolled-up housing need. An overly prescriptive policy is not going to assist in meeting housing delivery targets for any house type.

Housing with Care, Extra-Care Housing and Retirement Housing

41. Which approach or approaches to housing for older people and care accommodation do you favour?

Houseboats

42. Which of the reasonable alternatives for houseboats do you favour?

Gypsies and Travellers

43. Which policy approach do you favour to planning for the needs of Gypsies and Travellers?

44. Are there any suitable sites for Gypsy and Traveller accommodation you wish to submit?

Travelling Showpeople

45. Do you support the favoured option for planning for the needs of Travelling Showpeople?

46. Are there any suitable sites for Travelling Showpeople accommodation you wish to submit?

Residential Caravans/Park Homes

47. Do you support the favoured option for residential caravans and park homes?

48. Are there any potential locations for new/expanded residential caravan sites that you wish to propose?

Climate Change

49. Do you support the favoured option for climate change policy?

Air Quality

How Should Air Quality be Covered in the GNLP?

50. Which approach do you favour for air quality? (refers to options on pg.104-5)

Flooding

How Should Flooding and Flood Risk be Covered in the GNLP?

51. Do you support the favoured option for flood risk policy?

Nature Conservation, Green Infrastructure and Habitats Regulation Assessment Mitigation

How Should Nature Conservation and Green Infrastructure be Covered in the GNLP?

52. Which option do you support? (refers to options on pg.111)

Glavenhill supports a variation of option NC1 where specific housing, employment and a new garden settlement in the Cambridge-Norwich hi-tech corridor are chosen to deliver large areas of strategic green infrastructure. My clients have already made detailed representations promoting a number of sites at Rackheath, Salhouse, Barford, Caistor St Edmund, Mulbarton and Hethel (the new garden village site) to deliver a network of new large green spaces including Country Parks linked to housing and new settlement delivery. This site at Hethersett can provide 3.14 ha of open space in the form of a Park and wildflower meadow.

Glavenhill considers that the blanket application of option NC1 as an enlarged fixed open space requirement to be delivered on all new housing sites regardless of location, context, scale and viability will not deliver the quantum, or quality, of strategic green infrastructure needed to meet existing shortfalls or offset the impact of planned new housing growth on the Natura 2000 sites (including the Norfolk and Suffolk Broads) quickly enough. This over-and-above requirement will only serve to frustrate development on viability grounds. Furthermore, this new dispersed network of extra green space on housing sites in conjunction with Whitlingham County Park will also not be sufficiently attractive to mitigate against the inevitable recreational impacts of new growth on the North Norfolk Coast SAC, SPA and Ramsar, The Broads SPA and Broadland SPA and Ramsar. This is evident through the on-going application of a similar extra green space policy in Broadland District Council area that is doing very little to meet overall open space targets/existing deficiencies within the Norwich Policy Area.

We further consider that the pooling of offsite payments as proposed under option NC2 will also not work for the same reasons. The problem being that land on the edge of existing urban areas where sustainable growth is being focused has clear hope value and is therefore typically not for sale for low-value open space and recreation uses.

The clear and obvious way forward is to select specific housing sites as a focus for growth around the City of Norwich that are sufficiently large to accommodate this shortfall and open space

requirement and to make open space delivery (quantum, type, equipment required and phasing) a requirement of the allocation in order to provide meaningful Green Infrastructure.

I would direct you to my clients' previous representations submitted in response to the previous call-for-sites and the accompanying Supporting Representation document entitled Green Infrastructure Strategy dated July 2016 that outlines a comprehensive delivery strategy.

53. Do you think any changes should be made to the Green Infrastructure network?

In line with Glavenhill Strategic Land's previous representations we consider that changes need to be made through an expansion of the existing Green Infrastructure network around Greater Norwich. We favour an alternative approach focused around the deliver new large housing allocations enabling the linked delivery a network of new County Parks as a properly costed requirement of development. We have assembled a number of sites in addition to this one in the following locations that are fully costed and can deliver the following as dedicated mixed-use allocations:

- Horsham St Faith (circa 70 dwellings delivering 8.95 ha);
- Barford (circa. 150 dwellings delivering 28.95 ha);
- Rackheath (circa. 300 dwellings delivering 31.78 ha);
- Salhouse (circa. 150 dwellings delivering 11.48 ha);
- Hethel (circa. 2-3000 dwellings as a new garden village delivering 101.21 ha);
- Mulbarton (circa. 175 dwellings delivering 9.81 ha); and
- Caistor St Edmund (circa. 300 dwellings delivering 24.47 ha).

This linked housing and new strategic green infrastructure approach will deliver circa 207.64 ha of new green infrastructure and open recreational spaces in the form of Country Parks for public use. The County Park locations have been selected as they are all on main road corridors, on the edge of existing sustainable growth settlements and are also accessible to walking, cycling and public transport. See our attached Green Infrastructure Paper at Appendix 3 for further information.

This smart approach to meeting growth and open space requirements will allow people (both existing and future residents) to live healthier lives in locations that they don't feel the need to escape from at the weekends to reduce the impact to the Natura 2000 sites and on-going and increasing costs to the public purse.

Landscape

Landscape Character and Protection

54. Which of these options do you favour? (refers to options on pg.115)

Glavenhill understands the need to protect sensitive landscapes and river valleys but these landscapes are generally subject to existing other levels of protection. We also understand the need to prevent coalescence between existing settlements to protect townscape character and to

enable resident populations to have direct access to countryside recreation and benefits. Nevertheless, we object in the strongest possible terms to approaches outlined in options LA1 and LS2 especially the protection of the route of the NNDR that has no real landscape merit (one of the key reasons the route was selected and evidenced in the original submission documents) and is designed to facilitate access to new future planned growth areas.

Both approaches favour the blanket application of Green Belt-type constraint policies for no valid landscape and/or planning reasons when (due largely to a lack of brownfield land supply within the City) the outward expansion of Norwich into the fringe parishes is inevitable. Indeed, the current growth strategy for Norwich as contained in the adopted Joint Core Strategy acknowledges that the Norwich Policy area that is the countryside beyond the existing urban edge is the most sustainable location for new housing and employment growth.

Glavenhill favours a new option that seeks to deliver a proper planning approach to development and one that allocates sufficient deliverable and viable housing and employment sites to meet real-time needs (including City Deal growth requirements) rather than the current strategy that seeks to underprovide for all the wrong reasons. This is the most appropriate way to take the development pressures off the higher value fringe parishes beyond the outer edge of the City.

Strategic Gaps

55. Should the GNLP protect additional Strategic Gaps and if so where should these be?

Glavenhill does not agree that new Strategic Gaps are required within the Greater Norwich Local Plan area to separate existing settlements. This is because similarly worded countryside policies already acting as development constraints already exist and this type of quasi-Green Belt-type policy is not required.

Energy

56. Should option EN1 be included in the GNLP?

Water

57. Do you support option W1?

Communities

Location of Affordable Housing within Sites

58. Do you support option COM1 for the distribution of affordable housing?
Health Impact Assessments
59. Which option do you support? (refers to options on pg.123)
Neighbourhood Planning
60. Do you support option NP1? If so, which GNLP policies should be “strategic”?
Culture
How Should Culture be Covered in the GNLP?
61. Which option do you support? (refers to options on pg.126-7)
The Broads
62. Do you support option BR1?
Section 7 – Monitoring the Plan
Monitoring of the GNLP
63. Are there any current indicators that should be excluded or included in the GNLP monitoring framework?
Shortfall in Housing Land Supply
<p>64. Which option do you support? (refers to options on pg.131-2)</p> <p>We 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</p>

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.

Continuing to allow planning permissions on a 5-year land supply basis until the short focused review has been completed is a reasonable approach and if an appropriate buffer is added to the 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

65. 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 have 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	Red	Green
Accessibility to Services	Amber	Green
Utilities Capacity	Amber	Amber
Utilities Infrastructure	Green	Green
Contamination and Ground Stability	Green	Green
Flood Risk	Amber	Green
Market Attractiveness	Green	Green
Impacts Analysis		
Significant Landscapes	Amber	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

The HELAA assessment sets out that *“initial evidence indicates that a suitable access cannot be achieved to New Road, but it is possible that it could be delivered through the site GNL480 being promoted by the same landowner.”* However, the site layout on which the assessment was based shows that access is achievable to the B1172 and the accompanying access drawing showed that 90m visibility splays can be provided in both directions. Therefore, it should not be necessary for access to be achieved via New Road, even though this would be achievable via site GNL480. The

access drawing at Figure 3 demonstrates that the site could be accessed in its own right via the B1172, with adequate visibility splays.

Services

As set out above, the site is well located in terms of access to services and facilities within the key Service Centre and to bus stops.

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.

At this stage it is not known whether there is sufficient capacity in the networks to accommodate the new development. If there is not sufficient capacity, then upgrades may be required in order to accommodate the development. This is not an over-riding constraint to development of the site.

Contamination and Ground Stability

Both the Ordnance Survey 1st Edition Map and the earlier Tithe map show the allocation site as open agricultural fields. The agricultural use of the land is also shown on the 1946 and 1988 aerial photos available on the Norfolk County Council website indicating that the site has been in continuous agricultural use since at least the 1840's/1850's and the likelihood of ground contamination is therefore low.

No information is available at the moment regarding ground stability, but ground conditions can be surveyed at the appropriate time to inform foundation design.

Flood Risk

The Environment Agency Flood Maps show that the site is in Flood Zone 1 at low risk of flooding from rivers or the sea.

There is an area at risk of surface water flooding towards the north-east corner of the site but no residential/care properties are proposed in this area. The proposed layout of residential/care properties on the site and the surface water drainage strategy can be designed to mitigate any risks.

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 Key Service Centre with easy access into Norwich City Centre and employment opportunities at the NRP and Hethel Innovation Centre. There is also a particular need for care facilities for the elderly in this location due to the aging population and this site could help to serve that particular need. It also offers a different type of site to the large urban extension to the north of Hethersett already allocated in the previous JCS.

Significant Landscapes

There are no significant landscape designations in this area e.g. AONB but the area is defined as part of the Strategic Gap between Settlements under Policy DM4.7:

“Development will be permitted in the Strategic Gaps identified on the Policies Map, between the development boundaries of the settlements listed below, where it would not erode or otherwise undermine the openness of the Strategic Gap, and complies with other development Plan Policies.”

Early in 2016, Chris Blandford Associates (CBA) represented South Norfolk Council in a planning appeal against a proposed housing development on Land West of Elm Farm adjacent to the boundary of Wymondham, within the Wymondham-Hethersett Strategic Gap. That site is within the same Strategic Gap as the New Road site (although on the other side).

CBA’s argument against the development on the appeal site was based on CBA’s 2012 Study for the Council. In summary, CBA’s evidence concluded:

“..... that the proposed development on Parcel B, which lies within the Strategic Gap, would erode and undermine the openness of the Strategic Gap. This would lead to significant harm to the function of the Strategic Gap contrary to policy DM 4.7 of the adopted South Norfolk Local Development Policies Document.”

Despite both inspector and Secretary of State (SoS) recognising the harm this development would do to the Gap, the appeal was dismissed by the SoS and planning permission granted. The SoS decision letter states:

“The Secretary of States agrees with the Inspector’s conclusion that despite being contrary to Policy DM 4.7 and the harms identified, the Parcel B site is an area, which if developed for housing, would not have such a significant impact on the separation between settlements as might arise at other points within the strategic gap. He also agrees that allowing development here would be easy to define and so would not set a precedent which would undermine the remaining strategic gap.”

Chris Blandford Associates have undertaken a Landscape and Visual Impact Assessment of the impacts of development on GNLP sites 0480 and 0481 on the strategic gap in this location (see Appendix 1)

This sets out a preferred development option at Figure 10 and concludes as follows:

“There is no doubt that the site fulfils an important function within the context of the Strategic Gap. It not only contributes to the openness of the Gap, but it provides a countryside setting for Hethersett. However, this in itself may not prevent some of the site from being developed. The key to the acceptability of any development on the site will be its ability to avoid any significant erosion of the Gap and protection the Gaps openness.”

With appropriate site planning and design, it is thought that the preferred option (Option 4) could be accommodated on the site whilst protecting the essential rural character and openness of the landscape within the Gap. It should also be possible to avoid detracting from Hethersett’s landscape setting. The development would not result in any settlement coalescence, be it visual or physical. Consequently, it is considered that development along the

lines of option 4 is unlikely to erode or otherwise undermine the openness of the Gap.

The development also brings potential GI benefits for existing residents, as the majority of the site could be open space with pedestrian and cycle routes linking to other GI initiatives in the area.”

Therefore, provided that the site is laid out broadly in accordance with the recommendations set out in the CBA report, allocation of in the region of 50 dwellings and/or a care home, and/or sheltered housing and/or housing with care for the elderly and a 3.14 ha park will have no significant impact on the openness of the Gap. The Indicative Proposals Plan at 3) above has been developed on the basis of these recommendations.

Townscapes

This site is well related and appropriate in scale to the existing form of development in this location. The proposed layout of the site shows that the development would sit neatly within a triangle surrounded on two sides by existing residential uses to ensure that views across open countryside would be retained from the B1172 and the New Road junction at the points where these are currently available through the existing gaps in the high hedgerow. The significant green infrastructure provision in the form of a park to include a wildflower meadow walk, would ensure that attractive open views are provided to the north-west where open countryside currently exists between Hethersett and Wymondham.

Biodiversity and Geo-diversity

There are no national or local ecological or geological designations on the site. An ecological survey of the site can be undertaken at a later stage but given its open arable nature it is not considered that there will be any significant ecological impacts.

Historic Environment

There are no Listed Buildings or Scheduled Monuments either within the site boundary or adjacent to the site.

An archaeological desk top survey and field work, if necessary, can follow at an appropriate stage. It is considered unlikely that archaeology will place any over-riding constraints on development of this site.

Open Space and Green Infrastructure

This site can provide a surplus of open space/Green infrastructure for a site of this size. The 3.14 ha of new green infrastructure within a Park and wildflower meadow is promoted in combination with other Glavenhill Strategic Land sites as a new network of usable and attractive public open spaces within the Norwich Policy Area. This green infrastructure network is designed to be accessible to the Key Service Centres/Service Villages and main arterial routes in and out of Norwich to offset the impacts of planned housing growth on the Broads National Park.

Transport and Roads

There are existing pavements along the B1172 and New Road. These provide access to village services and facilities. Footway connections into these can be provided. There is a regular peak-time bus service connecting the site with the main population centres of Norwich and Wymondham. The bus services are First Bus 13A/B/C, 15 and Konect Bus 6/6A. The nearest bus stops are opposite the New Road junction and on New Road.

Compatibility with Neighbouring uses

There are not considered to be any constraints with regard to the compatibility of neighbouring uses, which are either residential in character or open farmland. The site will not adversely impact on the residential 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.

7. Conclusions

The Preferred Development Option Plan (Figure 2) shows one way in which the site could be developed to accommodate in the region of 50 dwellings and/or sheltered housing and/or housing with care for the elderly and a 3.14 ha park. It could also be developed in conjunction with GNLP480 which is also under the control of Glavenhill Strategic Land.

The site is well located in Hethersett which is within the Norwich Policy Area and within 7 miles of higher order services and employment opportunities in Norwich City Centre and jobs at Norwich Research Park (3 miles). The village has a wide range of facilities, local employment opportunities and a regular peak-time bus service connecting the site with the main population centres of Norwich and Wymondham.

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

The allocation site makes a logical extension to the village to help accommodate future growth and is of appropriate scale for its location and to provide a choice of sites to aid delivery in a village that already has a major strategic housing allocation to the north. There is also a particular need for care facilities for the elderly in this location due to the aging population and this site could help to serve that particular need.

The site will not have a significant adverse impact upon the character and setting of the village, or the strategic gap between Hethersett and Wymondham as the layout can be designed to address this as set out within the Chris Blandford Associates report at Appendix 1. The site also offers provision of significant green infrastructure to serve both this site and wider green infrastructure deficiencies within the area.

This site could provide a care home and housing with care and be combined with GNLP480 which could provide additional housing with care. The care home on this site would provide the centre and facilities for care provision across the combined sites. This would also enable the provision of a larger Park across the combined sites which would make a significant contribution to green infrastructure deficiencies in the area. Both sites are under the control of Glavenhill Strategic Land.

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.

8. Next Steps

Glavenhill Strategic Land would welcome the opportunity to discuss this site and the potential for strategic Green Infrastructure provision with GNLP officers. Glavenhill are prepared to undertake further technical assessment work as necessary, to further demonstrate the suitability of this site for allocation.



Appendices

Appendix 1 – Chris Blandford Associates Report

Lanpro Services

New Road, Hethersett

Landscape and Visual Appraisal



Lanpro Services

New Road, Hethersett

Landscape and Visual Appraisal

Approved

Position	Director
Date	12-07-2017

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Appendices

A	Initial Development Options
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1.0 INTRODUCTION AND BACKGROUND

- 1.1.1 Chris Blandford Associates (CBA) is appointed by Lanpro Services (the client), to undertake a landscape and visual appraisal of land (the site) on the western edge of Hethersett, which lies within the Wymondham-Hethersett Strategic Gap (**Figure 1**). The appraisal is intended to inform the site planning of a proposed low density residential care home and provide an understanding of how such a development would impact on the function of the Strategic Gap.
- 1.1.2 In conjunction with the planning authority, a number of viewpoints have been identified and used in the landscape and visual appraisal of the proposed development. The viewpoints are shown on **Figure 2** and the appraisal photographs are shown on **Figures 3 to 9**.
- 1.1.3 In carrying out this appraisal, CBA visited the site and surrounding area and provided initial site planning advice to Lanpro in order for several initial development options to be prepared. These options are shown in **Appendix A** and are as follows:
- Option 1 - a single storey development within the north east corner of the site;
 - Option 2 - a two storey development within the north east corner of the site; and
 - Option 3 - a single storey development split into two locations across the site, one located within the north east corner and a further development located adjacent to the existing ribbon development on the B1172.
- 1.1.4 Following CBA's initial advice on the 3 options, a further option was prepared-(Option 4, **Figure 10**). This is effectively a revision to option 3, as it retains a split single storey development within the north east of the site and adjacent to the existing residential development on the B1172. The layout of the development is however different, as it seeks to protect more of the open view across the gap from the views on New Road and the B1172 west of Hethersett.
- 1.1.5 CBA was originally commissioned by South Norfolk Council in 2012 to undertake a study to review several existing Strategic Gaps in the previous Local Plan and to recommend boundary changes for the Gaps in the new Local Plan. These recommendations were subsequently supported by the Local Plan inspector with some minor amendments in 2015.
- 1.1.6 CBA's 2012 report made the following recommendations with regards to the eastern boundary of the Gap;
- 'The eastern gap/break boundary abuts the edge of New Road or the boundaries of residential properties on the edge of Hethersett. This gap/break boundary is clearly defined and generally abrupt as it abuts open fields that are defined by trimmed hedgerows with few hedgerow trees.*

Any development alongside Hethersett in the far eastern parts of the gap/break would detract from the landscape setting of Hethersett and erode the essential rural character and openness of the gap/break.'

- 1.1.7 Following the adoption of the Local Plan, the protection of Strategic Gaps was set out within Policy DM 4.7 Strategic Gaps between settlements within the Norwich Policy Area. This states:

'Development will be permitted in the Strategic Gaps identified on the Policies Map, between the development boundaries of the settlements listed below, where it would not erode or otherwise undermine the openness of the Strategic Gap, and complies with other development Plan Policies.'

- 1.1.8 Early in 2016, CBA represented South Norfolk Council in a planning appeal against a proposed housing development on Land West of Elm Farm adjacent to the boundary of Wymondham, within the Wymondham-Hethersett Strategic Gap. This development is within the same Strategic Gap as the New Road site (although on the other side).

- 1.1.9 CBA's argument against the development on the appeal site was based on CBA's 2012 Study for the Council. In summary, CBA's evidence concluded:

..... that the proposed development on Parcel B, which lies within the Strategic Gap, would erode and undermine the openness of the Strategic Gap. This would lead to significant harm to the function of the Strategic Gap contrary to policy DM 4.7 of the adopted South Norfolk Local Development Policies Document.'

- 1.1.10 Despite both inspector and Secretary of State (SoS) recognising the harm this development would do to the Gap, the appeal was dismissed by the SoS and planning permission granted. The SoS decision letter states:

'The Secretary of States agrees with the Inspector's conclusion that despite being contrary to Policy DM 4.7 and the harms identified, the Parcel B site is an area, which if developed for housing, would not have such a significant impact on the separation between settlements as might arise at other points within the strategic gap. He also agrees that allowing development here would be easy to define and so would not set a precedent which would undermine the remaining strategic gap.'

2.0 EXISTING BASELINE

2.1 Landscape Context

2.1.1 The Gap lies within the D1 Wymondham Settled Plateau Farmland Landscape Character Area (LCA), as defined by the South Norfolk Landscape Assessment (June 2001). Key characteristics of this LCA include:

- 'A settled landscape with large, edge-of-plateau towns (including market towns and those of more modern origin) and villages plus smaller, nucleated settlements which are dispersed across the plateau.
- Large expanse of flat landform with little variation over long distances with strong open horizons – the archetypal 'Norfolk' landscape of popular imagination.
- Large scale open arable fields including sugar beet, cereal and oilseed rape monocultures creating simple, often monotonous, character.
- Long views from plateau edge, including to Norwich from the northern plateau edge.
- Poor hedgerows generally, which accentuates the openness of the landscape. The resulting wide verges beside roads often contain attractive wildflowers. Some mature hedgerow trees are found, particularly beside roads, which are a distinctive feature. Areas of more intact hedgerow network sometimes occur around settlements.
- Sparsely wooded but with occasional woodland blocks, sometimes associated with former parkland areas, creating a more wooded character and wooded horizons in parts of this generally open landscape.'

2.1.2 The landscape character assessment identifies 'Very important strategic break(s) between Wymondham-Hethersett-Cringleford and Norwich' as one of the significant landscape assets of this LCA.

2.1.3 In terms of the principal sensitivities and vulnerabilities of this LCA, the landscape character assessment identifies, amongst other things, the potential for 'settlement coalescence, particularly associated with the vulnerable A11 corridor or B1172 between Wymondham and Hethersett.'

2.1.4 The Landscape Character Assessment states that the overall strategy for this LCA is to 'maintain its open agricultural landscape character, with its distinct pattern of concentrated settlement on the plateau edge with more dispersed nucleated villages and isolated farm buildings across the plateau top.'

- 2.1.5 The landscape character assessment identifies various development considerations, including:
- ‘maintain the nucleated clustered character of the settlements and limit edge sprawl out into the adjacent landscape; well-planned infill and edge development may be acceptable.
 - maintain strategic gaps between settlements, and in particular prevent further growth of Wymondham and/or Hethersett which would lead to coalescence of settlement along the A11 leading to the merger of Wymondham/Hethersett or Hethersett/Norwich.

2.2 The Landscape of the Gap

- 2.2.1 At the time of the 2012 study the extent of the Gap occupied a significant proportion of the countryside between the settlements of Wymondham to the west and Hethersett, located to the east. At the time of the 2012 study, land north of Norwich Common was under construction (now known as Becketts Grove) and housing on ‘Carpenters Barn’ was planned.
- 2.2.2 Beyond the new development areas, the landscape of the Gap appears not to have changed fundamentally between 2012 and now. The only key difference is the presence of new housing on Carpenters Barn, which together with Becketts Grove has created a new eastern settlement edge to Wymondham. There has been further infill development along the B1172, with several new houses having been recently constructed in between existing residential development close to Hethersett.
- 2.2.3 The local landscape is flat to gently rolling with levels varying approximately between 45 and 50m Above Ordnance Datum (AOD).
- 2.2.4 Land on the south-western edge of the Gap at Wymondham lies at approximately 45m AOD while land on the north-eastern edge of the Gap at Hethersett lies at approximately 48m AOD.
- 2.2.5 Vegetation within the Gap is dominated by arable fields and small blocks of woodland. Field sizes are generally large to medium in scale; field boundaries are generally open or defined by mature native hedgerows. There are few hedgerow trees. There are several small blocks of woodland scattered across the western part of the Gap, including ‘The Wong’, a linear block of woodland associated with former parkland. These woodlands combine with field hedgerows to give a semi enclosed character to the western part of the Gap. To the east of the southern end of ‘The Wong’ and Elm Farm Business Park, the flat landscape affords more open, longer views, interrupted only by more distant hedgerows. Despite the erosion of openness caused by the intrusion from new housing development on the edge of Wymondham, the Gap maintains an overall open agricultural landscape character.

2.2.6 Following the SoS decision, residential development is permitted on land to the west of Elm Farm Business Park. Once implemented, this will further reduce the length of the Gap between the new western edge of Wymondham and the eastern edge of Hethersett. The Gap will have lost its semi enclosed western edge and will be predominantly an open landscape divided by field hedgerows and the occasional hedgerow tree. Management of this landscape has however allowed many of the field hedgerows to become overgrown in recent years. This has not only been for the benefit of the wildlife, but has given the landscape a stronger and more robust structure than it had previously when hedgerows were trimmed.

2.2.7 A network of footpath and bridleway routes has been developed in the local landscape to connect communities and to provide recreational access to the local countryside. Within the Gap itself, these comprise:

- Public Footpath (26), which connects the B1172 with Melton Road further to the north;
- A permissive bridleway that passes along the B1172; and
- A permissive bridleway that connects the B1172 with Melton Road in the form of a circular route.

2.2.8 These routes allow local residents the opportunity to appreciate the landscape of the Gap. Recent development on the eastern edge of Wymondham has however eroded the perception of countryside from those paths closest to the edge of settlement. The appreciation of the countryside will be further eroded when the permitted development west of Elm Farm is implemented. However views to the east remain predominantly open across the farmland of the remaining Gap. The effect of recent changes to land management, which has allowed hedgerows to become overgrown, has been to foreshorten many views from the Gaps edges and from within the Gap itself. This is particularly the case in the summer months, when only the occasional glimpse view of the western edge Hethersett can be seen through the intervening hedgerow vegetation from the permissive route network.

2.3 Sense of Leaving/Departing the Settlements

2.3.1 In terms of appreciating the openness of the Gap, it is important that there is a visual break when travelling between Wymondham and Hethersett and it is perceived, as far as possible, in the travellers' minds that they are leaving one settlement and passing through open countryside before arriving in another settlement. In eastward views from the B1172 the perception of leaving Wymondham starts shortly after passing the new junction into the Becketts Grove development (Albini Way). Thereafter the sense of departure is gradual, due in part to properties on the northern side of the road, being largely set back and in generous sized, mature gardens, all of which presents a 'green foil' to the road. The transition is also assisted

by countryside being visible between developments on the southern side of the road. These factors combine to impart a semi-rural character to the B1172 north of Becketts Grove which continues as far as Elm Farm Business Park, where the character becomes more open and rural. Once the permitted development west of Elm Farm Business Park has been implemented, the transition between town and country will become more abrupt, changing at the 'gateway' in the vicinity of Elm Farm Business Park.

- 2.3.2 When travelling west along the B1172 from Hethersett, there is a more abrupt delineation between urban edge and the countryside. The strong sense of passing through open countryside starts in the vicinity of the New Road junction with the B1172. Views across the site and beyond into the wider landscape of the Gap provide the first opportunity for travellers to understand they have left the settlement of Hethersett and are entering countryside. The perception of travelling through countryside continues until The Elm Farm Business Park on the edge of Wymondham, where shortly after the rural character begins to erode.

2.4 The Site

- 2.4.1 The proposed site for a low density residential care home is located immediately to the west of New Road, Hethersett and directly to the north of the B1172. It occupies two medium sized rectangular fields which are currently in arable use. The total site area is approximately 9ha, (**Figure 2**). The site has both visual and physical links with the wider landscape of the Gap to the west and north, but its otherwise rural character is influenced by the abrupt urban edge of Hethersett along New Road, which forms the sites eastern boundary.
- 2.4.2 The sites eastern boundary with New Road is marked by a low trimmed native hedgerow with the occasional mature tree. Residential properties on the eastern side of New Road overlook the site. The sites southern boundary, in part, follows the B1172. A high hedge extending approximately 50m from the junction with New Road obscures views into the site from the B1172. However where this ends, the boundary of the site is open affording extensive views from the highway across the site towards the western edge of Hethersett. The boundary remains open until it reaches existing residential property fronting the northern side of the B1172. This 'ribbon' of established and more recent properties is for the most part a mix of single and two story detached homes. The more easterly properties back directly onto the site and enjoy open views across the site and the wider countryside of the Gap. The sites western boundary borders a smaller field which appears to be permanent grassland, while the northern boundary, for the most part, borders an arable field. To the north of this field there is an unmade farm track with high hedges on either side and beyond this there are further arable fields of a similar size to those within the site. In the north east corner of the site, a cul-de-sac

(The Crescent) of semi-detached post war residential properties backs onto and overlooks the site.

3.0 LANDSCAPE AND VISUAL APPRAISAL

3.1 Appraisal Viewpoints

- 3.1.1 Photographs from the following viewpoints were taken during June/July 2017 to inform the landscape appraisal (**Figure 2**).
- 3.1.2 **Viewpoint 1- Figure 3**, is from the western edge of Hethersett on the B1172, looking west, this is the first opportunity for pedestrians and motorists leaving Hethersett to appreciate the open countryside of the Gap. Views into the site are however restricted by the high hedgerow fronting the B1172, but there are more open views to the south.
- 3.1.3 **Viewpoints 2 and 2a – Figure 3**, are from the New Road looking north and show the general character of the edge of settlement fronting the Gap.
- 3.1.4 **Viewpoint 2b - Figure 3**, is from New Road looking west into the residential cul-de-sac (The Crescent) which backs directly onto the site.
- 3.1.5 **Viewpoint 3 – Figure 4**, is taken from the junction of New Road with St David’s Road, looking west towards the Gap. The low hedge limits views, but there is a sense of being on the edge of settlement.
- 3.1.6 **Viewpoint 4 – Figure 4**, is from New Road close to the junction with the B1172. It is looking through a gap in the hedgerow across the site towards the residential property on the B1172.
- 3.1.7 **Viewpoint 5 – Figure 5**, is looking northwards across the site from the B1172. There is no hedging along this length of the site boundary and the site dominates the view, with the existing urban edge of Hethersett forming the backdrop.
- 3.1.8 **Viewpoint 6 and 6a – Figures 5 and 6**, although not strictly public viewpoints, these are from the farm track to the north of the site, along which there appears to be some informal public access. High hedging generally prevents views across the site, but gaps in the hedge allow glimpse views across farmland including the site towards the residential development on the B1172 and New Road.
- 3.1.9 **Viewpoint 7 – Figure 6**, taken from the end of the farm track, the view is looking west over the Gap. Distance and the layering effect of intervening hedgerows prevent any view of the eastern edge of Wymondham. It is thought unlikely that the new development west of Elm Farm

Business Park would be visible to any significant degree, although there is a possibility of it being increasingly visible during the winter months. If this is the case, this could introduce a component of 'intra-visibility' (i.e. the ability to see both settlement edges from a single point) from within the Gap during winter months.

- 3.1.10 **Viewpoints 8 and 9 – Figure 7**, are from the most easterly section of permissive path network which crosses the Gap. In easterly views, the occasional glimpses of buildings on the edge of Hethersett are visible, but these appear as isolated buildings, rather than giving the impression of a settlement edge. It is likely that during the winter months the edge of settlement will be more easily perceived from this section of the path network. Any views to the west are prevented in summer by the mature hedgerow bordering the path. It is however possible that during the winter months some views, of the future edge of Wymondham (once development on land west of Elm Farm Business Park has been implemented) would become apparent. This could introduce a component of 'intra-visibility' from within the Gap.
- 3.1.11 **Viewpoint 10 – Figure 8**, is also from the permissive path network looking east. Summer views towards Hethersett are screened by vegetation. Again it is however possible that during the winter months the edge of Hethersett becomes more noticeable from this viewpoint. From this location the future eastern edge of Wymondham is likely to be visible introducing a component of 'intravisibility' from within the Gap.
- 3.1.12 **Viewpoint 11 – Figure 8**, is again from the same permissive path network, directly to the east of the future development edge of Wymondham and is looking east towards Hethersett. Intervening vegetation prevents views of the edge of Hethersett during the summer months, but it is possible that some buildings on the edge of Hethersett will become apparent during the winter months. If so, this is unlikely to be anything other than the occasional glimpse view, which will not significantly change the character of this view. Looking west from this view, Wymondham and Elm Farm in particular is perceptible. This will however change with the implementation of the development on land west of Elm Farm Business Park, with the edge of development becoming much more noticeable and increasing the risk of introducing a component of 'intra-visibility'.
- 3.1.13 **Viewpoint 12- Figure 9**, is taken from the B1172 looking east towards Hethersett. The open character of the gap on both sides of the road is very apparent. From this location the 'ribbon of development on the B1172 is just perceptible.

3.2 The Value of the Site

- 3.2.1 The two fields making up the site are prominent in views from the western edge of Hethersett and in particular from New Road and from the B1172. In these views, the site appears open and has a strong visual continuity with the wider landscape of the Gap. On the approach to Hethersett from the B1172, the site is prominent in the foreground, providing an important open view towards the settlement edge as well as contributing towards the countryside setting to the town.
- 3.2.2 The site therefore makes an important contribution to both the physical and visual separation between the two settlements as well as to the openness of the Gap.

3.3 Initial Development Options

- 3.3.1 The following 3 development options were initially appraised to inform a preferred layout. They are included within **Appendix A**.
- Option 1 - a single storey development within the north east corner of the site;
 - Option 2 - a two storey development within the north east corner of the site; and
 - Option 3 - a single storey development split into two locations across the site, one located within the north east corner and a further development located adjacent to the existing ribbon development on the B1172.
- 3.3.2 While it is understood that all three options would require external infrastructure, such as an access and parking, these were not considered in the appraisal.

3.4 Option 1

- 3.4.1 Development in this part of the Gap would be visible from the western edge of Hethersett and from the B1172 east of the 'ribbon development'. The single storey development is however likely to be seen within an urban context as it would be set directly south and west of existing residential development. The existing housing on the edge of Hethersett is likely to continue forming the skyline in views from the B1172.
- 3.4.2 The rural approach into Hethersett from the west along the B1172 is unlikely to change, as development would not be visible until the traveller has passed the 'ribbon development' on the north side of the B1172. At this point the development would be seen within the context of the existing urban edge of Hethersett. When leaving Hethersett however development in this location is likely to impact on the sense of openness, as the views from the area around the

B1172 and New Road junction would be narrowed by the development extending into the centre of the site.

- 3.4.3 From the more distant views from within the Gap, it is thought unlikely that the development in this location would be visible, even during the winter. Consequently there is unlikely to be any change to the character of the views from within the Gap or any loss of openness. It is unlikely that development in this part of the site would result in either intervisibility or intravisibility between the two settlements.
- 3.4.4 For Option 1 not to potentially cause significant harm to the function the Gap; i.e. its openness, development would need to be pulled back from the centre of the site such that the existing sightlines are more closely protected.

3.5 Option 2

- 3.5.1 Development in this part of the Gap would be visible from the western edge of Hethersett and from the B1172, east of the 'ribbon development'. The two storey development is however likely to be seen within an urban context as it would be set directly south and west of existing residential development. There is however a risk that the existing housing on the edge of Hethersett would no longer form the skyline in views from the B1172. This would potentially increase the prominence of the development within the landscape of the Gap and on the edge of Hethersett.
- 3.5.2 The rural approach into Hethersett from the west is unlikely to change, as development would not be visible until the traveller has passed the 'ribbon development' on the north side of the B1172. At this point the development would be seen within the context of the existing urban edge of Hethersett. When leaving Hethersett however development in this location is likely to impact on the sense of openness, as the views from the area around the B1172 and New Road junction would be narrowed by the development extending into the centre of the site.
- 3.5.3 From the more distant views from within the Gap, it is possible that two storey development in this location may be visible during the winter. Consequently this could change the character of the views from within the Gap and adversely affect the general sense of openness. It is however thought unlikely that it would significantly increase any intervisibility or intravisibility between the two settlements.
- 3.5.4 For Option 2 not to potentially cause significant harm to the function the Gap, i.e. its openness, development would need to be pulled back from the centre of the site such that the existing sightline are more closely protected.

3.6 Option 3

- 3.6.1 This option locates development within two separate parts of the site. Single storey development would sit within the sites north east corner, similar to option 1 and a second part of the site, directly to the north of the residential properties on the B1172, would be developed as a single storey building.
- 3.6.2 Split single storey development in this part of the Gap is likely to be visible from the western edge of Hethersett and from the B1172, east of the 'ribbon development'. Developments within the sites north east corner would be seen within the existing urban context, being located directly south and west of existing residential development. Development on the sites southern boundary may also be visible from New Road, but again development would be seen within the context of existing housing on the B1172. It would be beneficial if any development north of the "ribbon development" is set low in the landscape in order to maintain the skyline.
- 3.6.3 From the more distant views from within the Gap, it is thought unlikely that the development in these two locations would be visible, even during the winter. Consequently there is unlikely to be any change to the character of the views from within the Gap or any loss of openness. It is unlikely that single storey development in these parts of the site would result in either intervisibility or intravisibility between the two settlements.
- 3.6.4 A consequence of a split development is likely to be that the present open view from the edge of Hethersett and the B1172 across the countryside of the Gap is narrowed, which could adversely affect the perception of openness within Gap.
- 3.6.5 The rural approach into Hethersett from the west is unlikely to change significantly, as development within the sites north east corner would not be visible until the traveller has passed the 'ribbon development' on the north side of the B1172. At this point the development would be seen within the existing urban context. The ribbon development itself would screen development on the sites southern boundary, such that it is unlikely to impact on the existing rural approach to the town.
- 3.6.6 For Option 3 not to potentially cause significant harm to the function the Gap, development on both sides of the site would need to be pulled back from the centre of the site such that the existing sightlines are more closely protected. In the case of the development north of the B1172 providing development is set low in the landscape the skyline would be maintained.

3.7 Preferred Development Option

- 3.7.1 Following the appraisal of options 1-3, a fourth option was developed (**Figure 10**), which has sought to address the concerns over the loss of openness.
- 3.7.2 Split development across the site would be visible from the edge of Hethersett (viewpoints 2,2a,2b,). Single storey residential development along the sites eastern boundary would however relate closely to the present settlement, although the existing 'edge of settlement' character would change, with development fronting both sides of New Road, similar to that which exists north of The Crescent. Overall however the present character and nucleated form of Hethersett would not change significantly as a result of this development on the edge of Hethersett.
- 3.7.3 The second area of development would also be visible from New Road and from the B1172 (viewpoints 4 and 5). It would be seen however within the context of the existing development on the north side of the B1172. In these views the footprint of development would extend northwards and could potentially narrow the existing open view. Keeping development as close as possible to the existing development edge and as low as possible in the landscape would be an important consideration in order to minimise the intrusion in the Gap. Its location behind existing development would ensure there would be little or no change to the present rural character of the B1172 between settlements (viewpoint 12). Most importantly the split development should maintain views across the central part of the site and across the wider landscape of the Gap. In so doing it should ensure the loss of any perceived openness is minimised and there would be minimal change to the sense of either arriving at or departing from Hethersett (viewpoint 1 and 12).
- 3.7.4 In views from the north of the site (viewpoints 6 and 6a), development would be visible, but in both cases it would be seen immediately in front of existing development on New Road and the B1172. As a result the existing character of the view would change very little. From the more distant views from within the Gap, (viewpoints 8,9,10 and 11), it is thought unlikely that the development in these two locations would be visible, even during the winter. Consequently there is unlikely to be any change to the character of the views from within the Gap or any loss of openness. It is unlikely that single storey development in these parts of the site would result in either intervisibility or intravisibility between the two settlements.
- 3.7.5 In summary, by splitting the proposed development on the site, the present rural approach into Hethersett would be unchanged. The openness of the Gap as seen from the area around New Road is unlikely to be significantly changed, as development would be largely located behind existing sightlines. By relating development closely to the existing pattern of development both

in Hethersett and along the B1172, the risk of any coalescence of the two settlements would be avoided. The density of vegetation across the Gap, combined with the development only being single storey, should ensure that there is no increase in either the intervisibility between the two settlements or any increase in intravisibility.

3.8 Landscape Mitigation Principles

3.8.1 Taking into consideration a further portion of the site being required for essential infrastructure, such as roads and parking, the majority of the site is likely to remain open (i.e. undeveloped). It is important that it is the central part of the site which remains open and undeveloped in order to maintain existing views across the Gap from the edge of Hethersett.

3.8.2 There are a number of design principles which should be considered as part of the site masterplanning and future design of the scheme.

- Key to the successful integration of the development into the landscape of the Gap would be minimising the buildings footprint and height. Whilst a balance would have to be struck between these potentially competing requirements, consideration could be given to minimising the developments footprint by incorporating some of the development functions within the roof space. Similarly the finished floor heights should also be as low as possible, helping to reduce the overall height of the building in the landscape.
- To reduce intrusion into the open landscape of the Gap, the buildings themselves should be located as close to the sites perimeter as possible. The siting of associated infrastructure should also avoid the central part of the site.
- Associated parking and driveways should be kept to a minimum and designed to be as low as possible in the landscape. To further mitigate the impact of infrastructure, drives and or parking areas should be screened by earth mounding and or planting. The use of fencing should be minimised and where it is used, it should be used in conjunction with native hedging and or set below the tops of mounding. The gradients of any mounds should be gentle, with back slopes graded out into the open landscape.
- It would be important to maintain as much of the open landscape as possible across the central part of the site in order to maintain the existing open view across the Gap from the edge of Hethersett. It is therefore recommended that private gardens are avoided in favour of communal spaces, which can more readily be designed to have a simple, open, 'natural' parkland character. Where private/communal space meets land accessible by the public, particularly close to the sites centre, 'solid' boundary features should be avoided in favour

of 'invisible' boundary treatments such as Ha Ha's. This would not only define defensible space but would help the flow of the landscape by avoiding compartmentalisation, which in turn would assist in maintaining the landscapes open character.

- Tree planting on the site should be minimised, the aim should not be to hide the development, but help assimilate it into the landscape through locating any tree planting appropriately and through the use of native species local to the area.
- Given the likely size of open space associated with this development, there is the opportunity for it to provide both private/communal gardens for the use of residents as well as publicly accessible open space for the benefit of Hethersett residents. Pedestrian and or cycle routes could cross the site and potentially link into other Green Infrastructure (GI) schemes instigated by other developments in the area

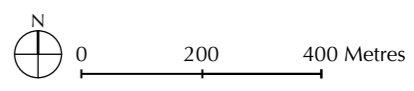
4.0 CONCLUSIONS

- 4.1.1 There is no doubt that the site fulfils an important function within the context of the Strategic Gap. It not only contributes to the openness of the Gap, but it provides a countryside setting for Hethersett. However this in itself may not prevent some of the site from being developed. The key to the acceptability of any development on the site will be its ability to avoid any significant erosion of the Gap and protection the Gaps openness.
- 4.1.2 With appropriate site planning and design, it is thought that the preferred option (Option 4) could be accommodated on the site whilst protecting the essential rural character and openness of the landscape within the Gap. It should also be possible to avoid detracting from Hethersett's landscape setting. The development would not result in any settlement coalescence, be it visual or physical. Consequently it is considered that development along the lines of option 4 is unlikely to erode or otherwise undermine the openness of the Gap.
- 4.1.3 The development also brings potential GI benefits for existing residents, as the majority of the site could be open space with pedestrian and cycle routes linking to other GI initiatives in the area.



KEY

- Site Boundary
- Strategic Gap

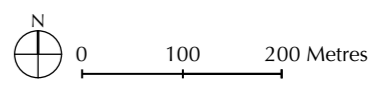


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KEY

- Site Boundary
- ↖ Appraisal Viewpoints



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Viewpoint 1 - Junction of B1172 with New Road



Viewpoint 2 - New Road



Viewpoint 2a - New Road



Viewpoint 2b - The Crescent



Viewpoint 3 - View from St. David's Road looking west



Viewpoint 4 - The Site, viewed from New Road



Viewpoint 5 - The Site, viewed from B1172



Viewpoint 6



Viewpoint 6a



Viewpoint 7 - From farm track looking west within Strategic Gap



Viewpoint 8 - From permissive bridleway within Strategic Gap



Viewpoint 9 - From permissive bridleway within Strategic Gap



Viewpoint 10 - From permissive bridleway within Strategic Gap




Viewpoint 11 - View from eastern edge of Wymondham



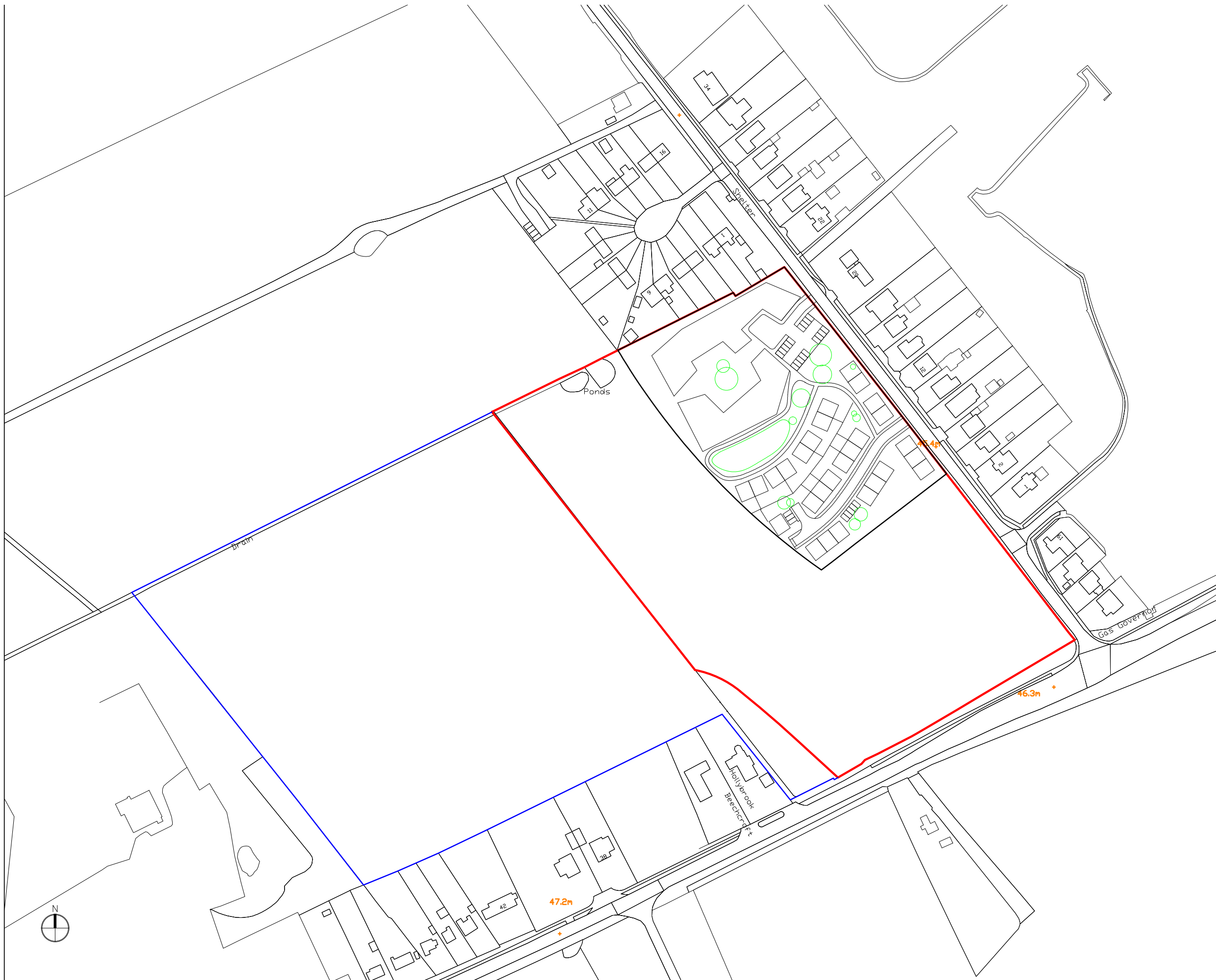
Viewpoint 12 - View from B1172 looking east

KEY

 Key views from New Road and the B1172



APPENDIX A
Initial Development Options



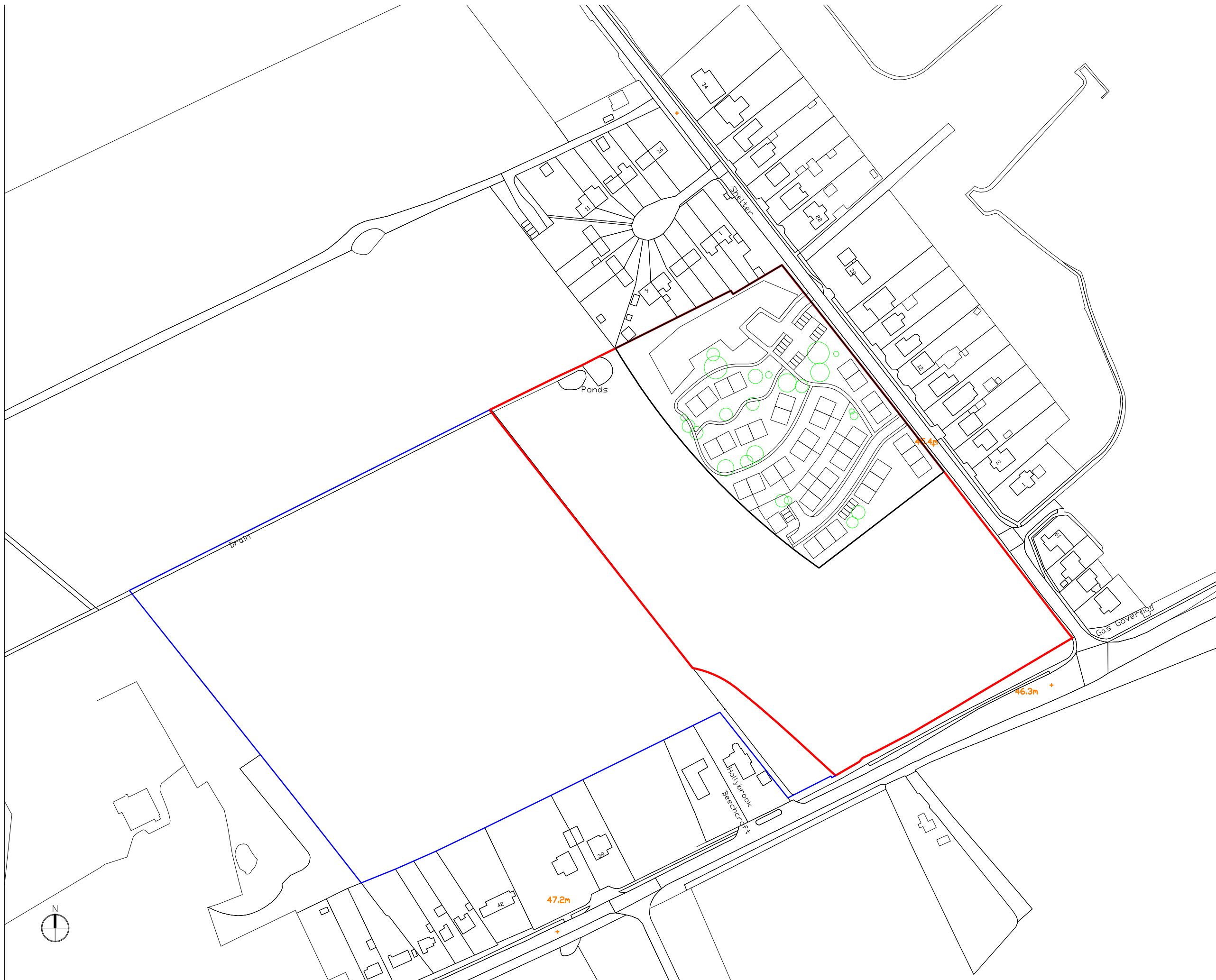
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OPTION 01
 Care Home: 3000 sqm - Single Storey
 28 units: x75 sqm - Single Storey

PURPOSE OF ISSUE FE for feasibility			
DRAWING STATUS S0 Initial Status			
PROJECT TITLE New Road, Hetherset			
CLIENT Glavenhill			
DRAWING TITLE OPTION 1			SCALE 1/2000@A3
DATE 21-06-2017	DRAWN BY TU	CHECKED BY -	APPROVED BY PA
DRAWING NUMBER			
PROJECT NO 0415	TYPE - 00	UNIQUE NO - 001	REVISION -



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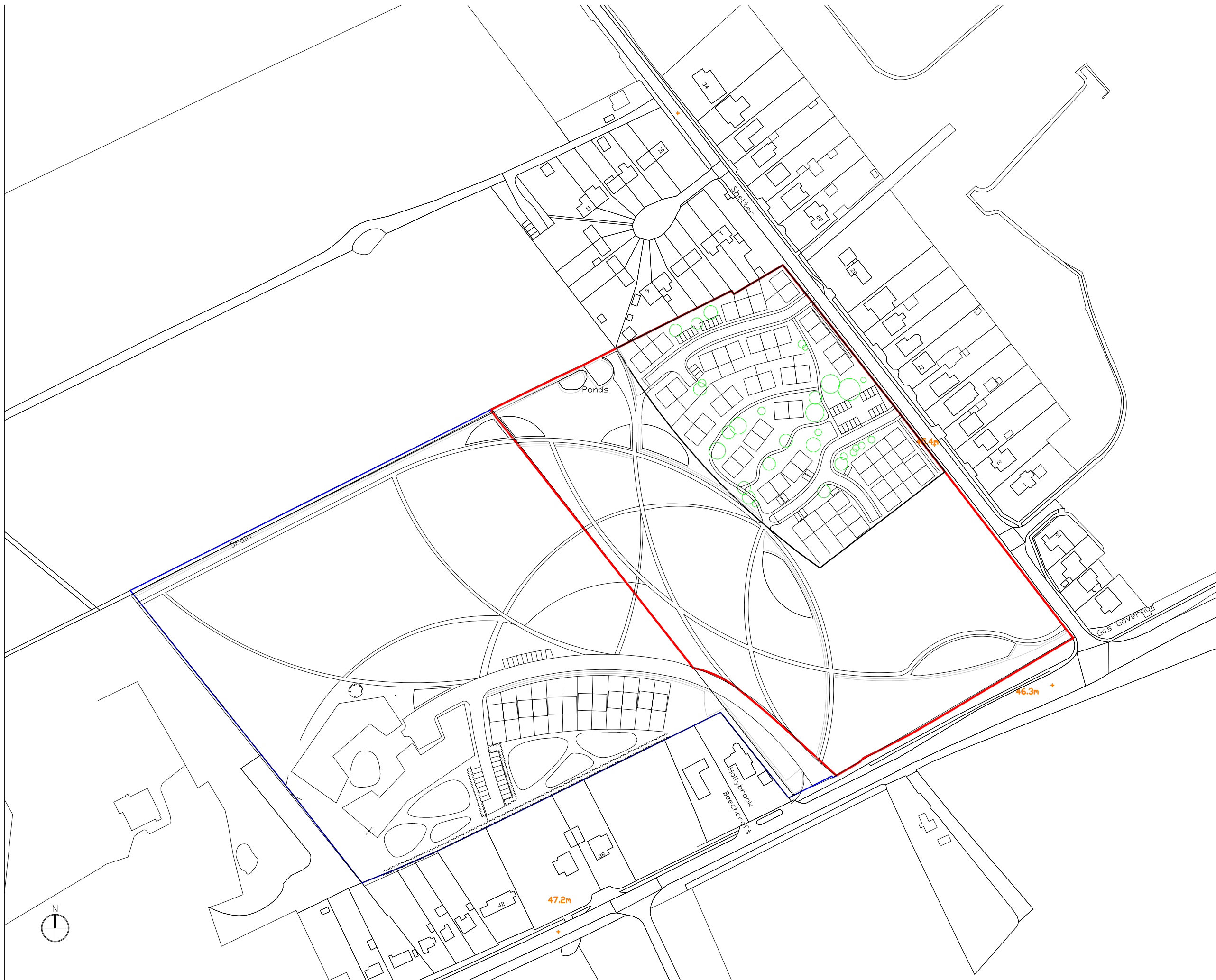
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OPTION 02
 Care Home: 3000 sqm - 2 Storey
 38 units: x75 sqm - Single Storey

PURPOSE OF ISSUE FE for feasibility			
DRAWING STATUS S0 Initial Status			
PROJECT TITLE New Road, Hetherset			
CLIENT Glavenhill			
DRAWING TITLE OPTION 2			SCALE 1/2000@A3
DATE 21-06-2017	DRAWN BY TU	CHECKED BY -	APPROVED BY PA
DRAWING NUMBER			
PROJECT NO 0415	TYPE - 00	UNIQUE NO - 002	REVISION -



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OPTION 03
 Care Home: 3000 sqm - Single Storey
 63 units: x75 sqm - Single Storey

PURPOSE OF ISSUE FE for feasibility			
DRAWING STATUS S0 Initial Status			
PROJECT TITLE New Road, Hetherset			
CLIENT Glavenhill			
DRAWING TITLE OPTION 3			SCALE 1/2000@A3
DATE 21-06-2017	DRAWN BY TU	CHECKED BY -	APPROVED BY -
DRAWING NUMBER			
PROJECT NO 0415	TYPE - 00	UNIQUE NO - 003	REVISION -



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