

Ref: GA/AM/03318/L0002am

28<sup>th</sup> November 2018

Greater Norwich Local Plan Team  
PO Box 3466  
Norwich  
NR7 7NX

By email: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Dear Sir / Madam,

**Representations towards the Greater Norwich Local Plan New, Revised and Small Sites Consultation  
On behalf of Saltcarr Farms Ltd and Westmere Homes Ltd in relation to land between Harvest Close and Dumbs Lane, Hainford (Site Reference GNLP2162)**

On behalf of our client Saltcarr Farms Ltd and Westmere Homes Ltd we wish to make representations to the Greater Norwich Local Plan (GNLP) 'New, Revised and Small Sites' consultation. These comments are made in light of the submission of our client's land at Harvest Close and Dumbs Lane, Hainford as part of the previous consultation in March 2018 – accordingly this land is included as one of the 'new' sites as part of the current consultation.

This representation primarily seeks to reiterate the case for our client's site and confirm their strong intent to promote **either** the whole site for a development of up to 60 homes to contribute towards the significant housing requirement of the Greater Norwich area or a one-hectare portion of the site to contribute towards the GNLP's small sites requirement. In addition, it also provides an expanded comparison between our clients' land and the full range of competing sites, drawing on the addendum reports accompanying both the HELAA and Site Proposals document.

To this end, this representation essentially seeks to reinforce our clients' previous submission dated 21<sup>st</sup> March 2018 now that we have the benefit of the updated evidence base documents. It should therefore be read alongside the information previously provided in respect of the site.

**Site Promotion to Date**

Section 5 of the Growth Options document, made available for consultation between January and March 2018, covered the identification of appropriate sites to meet the housing and development needs of the plan area. It clarified that approximately 600 sites were submitted towards the first 'Call for Sites' exercise held between May and July 2016. However, it also recognised that these sites may not necessarily be the best sites or in the right locations. To this end it confirmed that further sites, not necessarily considered in the HELAA, were sought at this stage.

The Exchange | Colworth Science Park  
Sharnbrook | Bedford | MK44 1LZ  
t 01234 867135 | e [info@arplanning.co.uk](mailto:info@arplanning.co.uk) | w [www.arplanning.co.uk](http://www.arplanning.co.uk)

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

This led to the submission of our clients' land between Harvest Close and Dumbs Lane, Hainford (now given the reference Site GNL2162) for the delivery of a residential scheme of up to 60 dwellings. An indication of the extent and location of the site along with its relationship with the village is shown below. A definitive plan showing the precise site boundaries is once again included with this representation.



Following this submission, the site has now been included within, and considered by, the addendum updates to both the Site Proposals document and the Housing and Economic Land Availability Assessment (HELAA). The conclusions of both are reviewed below.

Since the last round of consultation, it has now been confirmed that the site is to be promoted on behalf of Saltcarr Farms Ltd and Westmere Homes Ltd, the latter now holding an interest in the development of the land in the event of its successful promotion.

## **Review of Evidence Base**

### ***Addendum to Site Proposals document***

Following the assessment of our clients' site the addendum to the Site Proposal document states that the main constraint relates to highways and access. It also concludes that the site lacks footpath provision. In considering the site along with the other 'new site' West of Cromer Road (Site GNL2035) the addendum to the Site Proposals document concludes that *"due to highways constraints, the (new) sites are not considered to offer favourable options for housing in comparison with sites previously submitted"*. The document then restates that *"if Hainford is identified for further growth GNL20181 or part of it appears to be the least constrained site for residential development"*.

In respect of highways in particular this conclusion is curious - the Highways and Services Appraisal, prepared by Motion and submitted as part of our client's previous representation, clearly concludes that two alternative suitable vehicular access points can be provided to the site. One exits onto the modern cul-de-sac of Harvest Close with a second / alternative point of access then possible onto Dumbs Lane / Hall Road, the same road

that would provide the sole access point to site GNLP0181. In addition, the Highways and Services Appraisal, along with the schematic site plan, demonstrates how the site would directly connect with the local footpath network leading to the core of the village.

To this end it is clear that highways constraints are not on their own an overriding factor that would count against the site. On the contrary there are a multitude of options in respect of how the site may connect with the local highways and footpath network. To this end we urge the Council to review their conclusions set out in the Site Proposals document, suitably drawing on the HELAA analysis assessed below.

**Addendum to the HELAA**

Firstly, please note that the HELAA currently states that the site is being promoted for ‘up to 600 dwellings’ – this is of course incorrect. It is being promoted for ‘up to 60 dwellings’. Whilst we acknowledge that the 600-dwelling figure is a clear error rather than a misinterpretation of our previous representation it is important that this is both clarified and amended in all future documents.

Otherwise, the update to the HELAA presents a far more comprehensive review of the site than the Site Proposals document and allows for a clear comparison of its sustainability merits alongside the competing sites at the village. A summary of each site is shown in the table below – a green rating represents a lack of any constraint with an amber rating denoting a constraint that may potentially be mitigated.

	GNLP0065	GNLP0069	GNLP0181	GNLP0190	GNLP0393	GNLP0512	GNLP0582	GNLP2035	GNLP2162
<b>Constraints Analysis</b>									
Access	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
Accessibility to Services	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green
Utilities Capacity	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green	Green
Utilities Infrastructure	Green	Green	Green	Green	Green	Green	Green	Green	Green
Contamination and Ground Stability	Green	Green	Green	Green	Green	Green	Green	Amber	Green
Flood Risk	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Green
Market Attractiveness	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green	Green
<b>Impacts Analysis</b>									
Significant Landscapes	Green	Green	Green	Green	Green	Green	Green	Green	Green
Townscapes	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
Biodiversity and Geodiversity	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green
Historic Environment	Green	Green	Green	Green	Green	Green	Green	Green	Green
Open Space and Green Infrastructure	Green	Green	Green	Green	Amber	Green	Green	Green	Green
Transport and Roads	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
Compatibility with Neighbouring Uses	Green	Green	Amber	Amber	Green	Green	Green	Green	Green

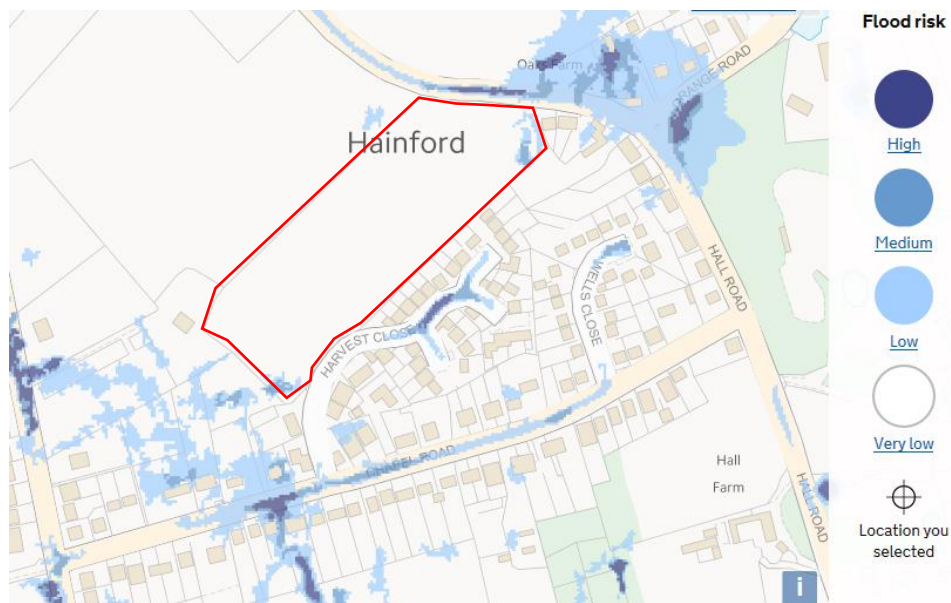
The conclusions are unequivocal – our clients’ land (Site GNLP2162) is substantially the least constrained when judged against the tests of the HELAA. To this end it should be considered the most sustainable. The only three areas where an amber rating is returned are:

- **Access:** As described above and set out in the Highway and Services Appraisal submitted alongside the previous submission this should not be considered a constraint. Sufficient vehicular access can be achieved at two separate points of the site. In addition, it can readily link in with the local footpath network comprising the pavement running along the southern edge of Harvest Close. It is also noted that all sites in Hainford receive an amber rating under this category;
- **Townscapes:** The impact of the scheme on the rural character of Hainford would be minimal. The site directly abuts the northern edge of the settlement envelope and is of a sufficient size to allow for a generous scheme of landscaping along its northern edge to ensure views of the site from the open countryside and softened and broken up; and
- **Transport and Roads:** The highways network throughout Hainford is rural in nature, comprising narrow lanes often without pavements. Once again, this constraint effects all sites in the village as demonstrated by the matrix above. Our clients' site, however, is able to provide two vehicular access points, both of which provide almost immediate access to Newton Road to the west, a road which is substantial enough to comprise a local bus route.

Otherwise our clients' site represents an entirely sustainable location for a sensitively designed and proportioned residential development at Hainford.

In comparison Site 0181, considered by the Site Proposals document as representing the most unconstrained site at the village, returns an amber rating in no fewer than nine categories including crucially (in respect of potential housebuilder interest and eventual delivery) market attractiveness and compatibility with surrounding uses. It is assumed that both of these matters are identified as a concern due to the close proximity of the site to a local breakers yard immediately across the road. The market attractiveness of a site now carries enhanced importance in the context of the updated NPPF and the increased imperative on both viability and deliverability. When compared with Site 0181 our clients' site also lies approximately 400m closer to the bus stops located on Newton Road to the west, representing one of the more accessible sites in the village in respect of public transport.

Surface water flooding is raised as a consistent concern across all sites save for our client's land and Site 0190 on the eastern extremity of the village. These concerns are reflected in not only the HELAA but also the high number of neighbour and Parish Council objections in relation to pressures on the local drainage. On review of the Environment Agency's flood mapping we can confirm that the developable area of our clients' site is entirely devoid of risk from surface water flooding. An extract of the mapping is included below.



Indeed, our clients' site is not only unfettered by surface water flooding but is of a size to include a sufficient drainage scheme to ensure that greenfield run-off rates continue to be achieved.

### **Alternative Scale of Development**

Whilst our clients are confident that the site could ably accommodate a new residential development of up to 60 dwellings we also acknowledge that paragraph 68 of the new NPPF presents a requirement for local planning authorities to identify a range of sites of less than one hectare to accommodate the delivery of not less than 10% of their housing requirement. Based on our calculations in respect of the residual housing requirement for the GNLP area this may represent up to 1,170 new homes.

To this end we are pleased to offer a one-hectare portion of the site, the location and orientation of which we would be happy to discuss further with Officers, as an alternative in the event that a smaller development, likely of approximately 25-30 dwellings, is deemed to more directly meet the needs of the Plan. It would still then be possible to deliver a scaled down element of open space, landscape screening and footpath linkages as part of a revised development framework.

### **Deliverability**

Following the publication of the new NPPF in July 2018 the ability for local planning authorities to demonstrate that their plan allocations are deliverable is critical to both the success of the strategy as well as the maintenance of their future housing land supply position. We are therefore pleased to confirm that our clients' land is deliverable in every respect and fully accords with the definition set out in the Glossary of the Framework.

Specifically, we are pleased to conclude that the site is:

- **Available:** The site is being actively promoted for residential development and is no longer required for the purposes of agriculture as it comprises part of a substantial agricultural holding. As set out elsewhere in this letter the site is made available for either a larger scheme of up to 60 dwellings or a smaller scale development of one hectare or less;
- **Suitable:** As demonstrated by both our client's previous submission as well as the findings of the HELAA the site is entirely suitable for a residential development at Hainford. In fact, contrary to the recommendation of the Site Proposals document, the combination of the HELAA and the highways evidence submitted as part of our client's representation in March 2018 clearly demonstrates that the site is the single most suitable location for residential development in the village; and
- **Achievable:** The site comprises an undeveloped agricultural field directly abutting the settlement boundary of Hainford. It is not subject to any development constraints and is entirely capable of being delivered in full (up to 60 homes) within the first five years of the plan period. To this end we are pleased to confirm that the site is highly marketable and entirely viable as demonstrated by the current joint promotion of the land by an active regional housebuilder, Westmere Homes.

Based on the expectation that Hainford will be required to accommodate a level of growth due to its position as a 'Service Village' in the draft Settlement Hierarchy we are pleased to conclude that our client's site represents a compelling opportunity to deliver new homes at the village in an entirely sustainable manner.

We trust that these comments will be given due consideration and look forward to participating further as the Local Plan preparation progresses. If you feel that a meeting would be appropriate to discuss our clients'

proposals, we would be keen to discuss available dates. Alternatively, if you require any further information in respect of the site in the meantime then please do not hesitate to contact either my colleague Alex Munro or myself.

Yours sincerely

Geoff Armstrong ([geoff.armstrong@arplanning.co.uk](mailto:geoff.armstrong@arplanning.co.uk))

**Director**

**Armstrong Rigg Planning**

Direct Line: 01234 867130

Mobile No: 07710 883907