

**Our Ref: 302659/CH/AW**

Sent by email to: GNLP@norfolk.gov.uk

14<sup>th</sup> December 2018

Dear Greater Norwich Planning Policy Team,

## **Greater Norwich Joint Local Plan – Regulation 18 Consultation**

**Site: Land North of Green Lane, Harleston & Land South of Redenhall Road, Harleston**

**Site Reference: GNLP2098 & GNLP2099**

I write further to the current Regulation 18 consultation with respect to the Joint Local Plan and in particular to the above sites. We hereby submit comments with respect to the above site references, GNLP2098 for Land North of Green Lane and GNLP2099 for Land South of Redenhall Road, in Harleston and in response to the Site Proposals Document Addendum New, Revised and Small Sites document and Housing and Economic Land Availability Assessment (HELAA).

On behalf of our client we welcome and support the Council's decision and consideration that the sites represent suitable sites and options for future residential development as identified within the HELAA and Site Proposals Document Addendum for New, Revised and Small Sites. To supplement this though and address some of the points raised in the site appraisal we would wish to make the following comments.

### **1. GNLP2098 – Land North of Green Lane, Harleston**

#### **Suitability**

We would reiterate that the site is suitable for residential development being well related and located adjacent to the settlement boundary of Harleston and adjacent to existing 20<sup>th</sup> Century residential development to the west. As a result the site forms a natural extension to the settlement of the market town of Harleston which has seen similar scales of growth in the recent past.

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Harleston being a Market Town with all the facilities needed for occupants needs and acting as a focus for the rural hinterland both in Norfolk and to the south along the Waveney Valley, together with its easy access on to the A143 make it a sensible and reasonable location for significant growth in the emerging plan.

The site is within close proximity to all the services and facilities within Harleston which provide all necessary day to day needs for future households. We would also highlight that none of the potential impacts or constraints identified in the HELAA cannot be overcome or mitigated against. In particular we note that the initial conclusions within the HELAA suitability analysis and comments of the Highway Authority highlight suitable access can be achieved.

The HELAA analysis highlights potential constraints include a small part of the site that is at risk of surface water flooding as identified on the Environment Agency Flood Risk Maps. However, as noted in the analysis the majority of the site (1.8 Ha) remains outside any notable surface water flood risk and is therefore developable. The site is of sufficient size with approximate numbers of dwellings provided on the site still to be determined through further site analysis to allow for the dwellings to be located outside of any areas at risk and to provide any necessary attenuation to avoid increasing risk elsewhere. Otherwise, there is nothing to indicate that a standard approach to landscaping and SUDS techniques would not be able to mitigate for any potential impacts of site and minimise risk on and off site. Therefore, this would not be a constraint on development.

We envisage the site coming forward with a sensitive approach to landscaping, scale and layout to avoid compromising the wider qualities and character of the surrounding river valley and townscape of Harleston. With respect to the provision of sewerage and main water supply there is nothing at this stage that would indicate that these cannot be provided whether this be through on site private treatment measures or improvements to existing infrastructure.

The fundamental considerations and impacts relating to transport and access, landscape, biodiversity, heritage and townscape implications can all be mitigated for and made acceptable. We would also highlight that this is a very realistic and attractive site to come forward being located on the edge of the town within walking distance to the various facilities in the town including a schools, playing fields, shops, bus services and employment facilities. Therefore, the site represents a very suitable site for development to be included in the emerging plan.

### **Availability**

We also take the opportunity to reiterate that the site is available and owned by our client and there are no known legal restrictions to bringing the site forward in the short term and indeed that would prevent an immediate delivery of new homes.

### **Achievability**

We also highlight that the HELAA appears to show in error in indicating delivery in years 11-15. In this regard we would highlight that the site is available now in freehold ownership of our client and there are no technical, legal, or viability constraints that would not prevent it from being developed within years 1 - 5. This is considered realistic for a site which is attractive being located on the edge of an existing settlement and within close proximity to local amenities including schools, shop and public houses. Indeed this provides for more than adequate flexibility in providing for any necessary improvements to the capacity of any necessary infrastructure to serve the development.

## **2. GNLP2099 – Land Land South of Redenhall Road, Harleston**

### **Suitability**

We would reiterate that the site is suitable for residential development being well related and located adjacent to the settlement boundary of Harleston and post-war residential expansion of the town. As a result the site forms a natural extension to the settlement and built form of Harleston. Harleston being a Market Town with all the facilities needed for occupants needs and acting as a focus for the rural hinterland both in Norfolk and to the south along the Waveney Valley, together with its easy access on to the A143 make it a sensible and reasonable location for significant growth in the emerging plan.

The site is within close proximity to all the services and facilities within Harleston which provide all necessary day to day needs for future households. We would also highlight that none of the potential impacts or constraints identified in the HELAA cannot be overcome or mitigated against. In particular we note that the initial conclusions within the HELAA suitability analysis and comments of the Highway Authority highlight suitable access can be achieved.

The HELAA analysis highlights potential constraints include a small part of the site that is at risk of surface water flooding as identified on the Environment Agency Flood Risk Maps. However, as noted in the analysis these are not significant and the site is of sufficient size for the dwellings to be located outside of any areas at risk and to provide any necessary attenuation to avoid increasing risk elsewhere. Otherwise, there is nothing to indicate that a standard approach to landscaping and SUDS techniques would not be able to mitigate for any potential impacts of site and minimise risk on and off site. Therefore, this would not be a constraint on development.

The site is located on the northern approach into the village and therefore we envisage a sensitive approach being taken to the landscaping, scale and height of development along the site frontage in order to avoid compromising the wider qualities and character of the townscape and the gateway into Harleston. With respect to the provision of sewerage and main water supply there is nothing at this stage that would indicate that these cannot be provided whether this be through on site private treatment measures or improvements to existing infrastructure.

The potential impacts on wildlife and biodiversity are not significant and can be suitably surveyed and mitigated through the policy and application process. With respect to the provision of

sewerage and main water supply there is nothing at this stage that would indicate that these cannot be provided whether this be through on site private treatment measures or improvements to existing infrastructure. The other considerations relating to access, heritage, and utilities can all be mitigated for through the policy allocation and subsequent design and development process. None of these considerations are a constraint on development.

We would also highlight that this is a very realistic and attractive site to come forward being located on the edge of the town within walking distance to the various facilities in the town including a schools, playing fields, shops, bus services and employment facilities. Therefore, the site represents a very suitable site for development to be included in the emerging plan.

### **Availability**

We also take the opportunity to reiterate that the site is available and owned by our client and there are no known legal restrictions to bringing the site forward in the short term and indeed that would prevent delivery of new homes in the short term.

### **Achievability**

We would highlight that the site is available now in freehold ownership of our client and there are no technical, legal, or viability constraints that would not prevent it from coming forward within the next 5 years. This is considered realistic for a site which is attractive being located on the edge of an existing village and within close proximity to local amenities including schools, shop and public houses and incorporates flexibility to deliver any necessary infrastructure to serve the development.

### **Summary**

With respect to site references GNLP21098 and GNLP2099 the applicant welcomes the Council's conclusions that the sites represent suitable sites for future residential development and provide for the natural expansion of Harleston. We highlight that there are no fundamental constraints or impacts that cannot be mitigated through the subsequent policy allocation, applications and development process

We would stress that the proposals put forward in contrast to recent speculative applications and individual piecemeal development within the District represent an opportunity to help deliver a planned future for Harleston and wider local community. One that addresses the specific existing and future needs of the District and the local community in a sustainable and accessible location and at the same time seeks to minimise the environmental impacts of future development. We would therefore welcome your support for the inclusion of the above site in the emerging joint local plan.

Do please feel free to contact me should you have any queries regarding the above.

Yours sincerely

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