

Our Ref: 402994/CH/AW

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

14th December 2018

Dear Greater Norwich Planning Policy Team,

Greater Norwich Joint Local Plan – Regulation 18 Consultation

Site: Land North Needham Road, Harleston & Land South of Needham Road, Harleston

Site Reference: GNLP2115 & GNLP2116

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, GNLP2115 for Land North of Needham Road and GNLP2116 for Land South of Needham 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. GNLP2115 – Land North of Needham Road, Needham

Suitability

We note that the site falls in the parish of Needham but has been submitted to address the growth needs of the town of Harleston. We would reiterate that the site is suitable for residential development being well related and located adjacent to the settlement boundary of Harleston and

BECCLES
01502 712122
10 New Market
Beccles
Suffolk
NR34 9HA

DISS
01379 642233
Pump Hill House
2b Market Hill
Diss, Norfolk
IP22 4WH

HARLESTON
01379 852217
32-34 Thoroughfare
Harleston
Norfolk
IP20 9AU

SOUTHWOLD
01502 723292
98 High Street
Southwold
Suffolk
IP18 6DP

HALESWORTH
01986 872553
12 Thoroughfare
Halesworth
Suffolk
IP19 8AH

AUCTION ROOMS
01502 713490
The Old School House
Peddars Lane
Beccles, Suffolk
NR34 9UE

MAYFAIR
0870 112 7099
Cashel House
15 Thayer Street
London
W1U 3JT

adjacent to existing late 20th Century residential development to the east. As a result the site forms a natural extension to the settlement and the built form of Harleston which has seen similar scales of growth in the recent past. 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 only adverse aspect highlighted in the HELAA analysis is the loss of Grade 2 Agricultural Land. However, we note that the surrounding district and region have an abundance of high quality agricultural land. The scale of the site at 6 Ha would not be of sufficient scale to warrant consultation with Natural England on this point and would not lead to the strategic implications on the availability of agricultural land. Therefore, this would not be a constraint on development.

The setting of the Grade II listed Building to the west is acknowledged by ourselves and client and the indicative numbers indicated for the site take account of the need to provide an open and landscaped buffer along the western boundary of the site. The provision of low density development, and open and soft edge to the site would ensure that there is no over-riding harm to the setting of the listed building. 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 landscape and townscape of Harleston on the approach into the town.

With respect to the provision of utilities, 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

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 within the town including schools, various shops, employment opportunities and recreational facilities. 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. GNLP2116 – Land South of Needham Road, Harleston

Suitability

We would reiterate that the site is suitable for residential development being well related and located on the edge of the Market Town 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 only adverse aspect highlighted in the HELAA analysis is the loss of Grade 2 Agricultural Land. However, we note that the surrounding district and region have an abundance of high quality agricultural land. The scale of the site at 7.1 Ha would not be of sufficient scale to warrant consultation with Natural England on this point and would not lead to the strategic implications on the availability of agricultural land. Therefore, this would not be a constraint on development of this site.

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 also 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 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 for by improvements to existing infrastructure.

The site is located along the western approach into the town 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 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

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.

Summary

With respect to site references GNLP2115 and GNLP2116 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 plan-

led 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 sites in the emerging joint local plan.

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

Yours sincerely

Christopher Hobson BSc (Hons) MSc MA MRTPI

Principal Planner

Building Consultancy Department

Diss Office

Email: chris.hobson@durrants.com

Administration: 01379 646603

www.durrantsbuildingconsultancy.com