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12 March 2020

Greater Norwich Growth Board

Dear Sirs

Greater Norwich Local Plan Regulation 18, Stage C Draft Strategy and Site Allocations – Land to the north of Mulbarton.

Background

These representations are submitted on behalf of Glavenhill Limited to the Greater Norwich Local Plan (GNLP) Regulation 18, Stage C Draft Strategy and Site Allocations Process.

The representations relate to land to the north of Mulbarton. The land is being promoted for residential allocation by Glavenhill on behalf of the landowner.

Land to the north of Mulbarton was promoted through the Greater Norwich Local Plan Regulation 18, Stage A Site Proposals and Growth Options process in March 2018 (site reference GNLP0496) for up to 180 dwellings, a site for a new doctor's surgery, burial ground extension and an additional 9.81 ha of Green Infrastructure.

The Greater Norwich Growth Board (GNGB) confirmed in their 2017 HELAA which has accompanied the draft Local Plan process that: *"The site is close to services and facilities in Mulbarton although the existing road network has been identified as a constraint. Other constraints are the impact on the setting of the village and impacts on listed buildings. The network constraints identified have the potential to be mitigated by a site of this [size] although further evidence will be required to demonstrate this. The site is concluded as suitable for the land availability assessment."*

Additional information, confirming the suitability of the site against the HELAA assessment criteria, and its availability and deliverability, was submitted to the GNGB in March 2018 (See previous location plan **Appendix 1**)

Shortly after the Regulation 18 Stage A consultation, Glavenhill submitted an outline planning application for the development of the site for up to 170 dwellings, doctors' surgery and pharmacy, public open space and associated drainage and highways infrastructure including 10 self-build units and 33% affordable housing (Reference 2018/0872).

The application was subsequently amended in response to heritage and landscape concerns to reduce the number of residential units to 135 and to remove the doctor's surgery/pharmacy site following NHS England's response that upgrade of the existing surgery was preferred at that point in time. The Highway Authority confirmed that they were satisfied with the access proposals for the site including the provision of pedestrian access from the site to village centre facilities and the

school. However, the application was refused on the basis that less than substantial harm to the listed Grade II* Church, the Grade II Paddock Farm and Conservation Area would not be outweighed by the public benefits of the proposal contrary to Policy DM4.1.

Concern was also expressed over the introduction of estate scale development out of scale with the surrounding development and urbanising features such as the roundabout on the approach to the village along the B1113, and the harm to the rural character of the landscape including views from the public footpaths to the east of the site. It was considered that the development would not protect the existing locally distinctive character of this part of the village and would be contrary to Policy DM3.8 and also DM 4.5.

These representations

These latest representations are made in response to the current GNLP Regulation 18, Stage C Draft Strategy and Site Allocations process including draft Policy 7.4 of the Regulation 18, Stage C Consultation Document which deals with the GNGB's strategy for village clusters. The draft policy as worded seeks new sites for allocation within the South Norfolk Village Clusters Housing Site Allocations document which will be published separately to this current consultation process.

These representations seek to amend the boundary of the site previously submitted as GNLP 0496 in response to both the requirements for cluster village sites and the reasons for refusal of the planning application (see amended site plan, **Appendix 2**). They seek to provide information to allow South Norfolk District Council to conclude that the site is an appropriate one for allocation within the South Norfolk Village Clusters Housing Site Allocations Document or as a sustainable allocation in its own right.

Draft Policy 7.4 confirms that 4,024 homes, or around 9% of the total housing growth for Greater Norwich Area across the plan period will be located within village clusters. 1,200 of these homes will be allocated within South Norfolk through their Village Clusters Housing Site Allocations document.

A report taken to South Norfolk's Regulation and Planning Policy Committee on 18 February 2020 confirms that whilst the majority of sites will be in the 12 units to 1 hectare range, there will still be circumstances where a slightly larger site may be the most appropriate option, including where the site is able to offer improvements to local infrastructure and where it clearly makes best use of the available site. It also confirms that village clusters within south Norfolk will be defined with reference to primary school catchments, which provide a proxy for social sustainability. In addition, paragraph 4.3 of that report also confirms that:

"Whilst the GNLP assessment has focussed heavily on safe routes to school the Village clusters site assessment will focus on good accessibility to a minimum number of services/ facilities from a core list. It is suggested that this be a minimum of three from the extended list (the HELAA core list of primary school, secondary school, local healthcare, day to day retail/service provision, local employment opportunities and peak-time transport, plus village / community hall and pub".

Glavenhill offer their general support to the concept of village clusters, agreeing that there is a need to allocate some new housing in accessible, rural locations to help support sustainable patterns of growth. However, as set out in their response to Question 13 on the proposed Sustainable Growth Strategy, Glavenhill also consider that there should be a greater emphasis on locating the homes in

cluster villages closer to Norwich (e.g. the old Norwich Policy Area) rather than in the less sustainable villages in the more rural parts of the District. This includes the allocation of some larger sites within sustainable villages. Glavenhill consider Mulbarton with its primary school and village service provision (including a doctor's surgery, village hall, convenience shopping, public house and peak time public transport service) and good connectivity to jobs and services in Norwich city centre and the Norwich Research Park to be an appropriate location for residential growth, either under the cluster village strategy, or as a larger allocation in a sustainable village under an amended growth strategy.

These representations go on to confirm the availability, suitability and deliverability of land to the north of Mulbarton for residential development, care home and a site for a doctor's surgery, if required.

The Proposed Allocation Site

The proposed allocation site is located on the edge of the combined service village of Mulbarton and Bracon Ash.

Mulbarton is located approximately 6 miles south of Norwich City Centre and 5 miles to the west of Wymondham. It is a mid-sized service village that provides a good range of services for its residents' day-to-day needs.

The site is located to the north east of the village adjoining the development boundary and conservation area. It comprises the arable field immediately to the north of the Church and also includes the area of land that wraps around the north of St Omers Close, containing existing scrub vegetation and a pond. The relatively recent St Omers Close residential development extends into the site from Norwich Road, helping to ensure that the field is part enclosed by, and well related to, the existing form of the village.

Vehicular access to the site is available from Norwich Road to the north of St Omers Close. A public footpath runs east-west along the southern boundary of the site providing pedestrian access to Mulbarton Parish Church and Mulbarton Common to the south.

Summary of Development Offer

The proposed allocation site provides a suitable, available and deliverable opportunity to supplement housing supply.

The proposed allocation site can accommodate approximately 60 residential dwellings, including bungalows, a care home for elderly care and a doctors' surgery. Alternatively, up to 95 dwellings could be provided without the care home and doctor's surgery sites. The amended site plan (**Appendix**) also shows the provision of new and reinforced boundary landscaping, footway improvements and open space provision and vehicular access from Norwich Road. The site is well located close to existing local service provision and on a safe pedestrian route to the local primary school. The assessment of the site under the previous planning application 2018/0872 confirmed that there are no technical constraints which would preclude development on this site. The proposed amended allocation site will offer the following:

- A single point of access onto Norwich Road previously confirmed appropriate in the location shown. This was the agreed location of the secondary access point for the larger residential scheme considered under the planning application. Suitable visibility splays can be provided here.
- Suitable pedestrian links to services and facilities within the village can be provided both via improvements to existing footways along Norwich Road and via the existing public right of way from the southern corner of the site to the Common.
- There were no previous objections in relation to drainage or flooding from either the Environment Agency or Lead Local Flood Authority. A similar approach to drainage would be taken for the allocation site with a drainage pond located in the field to the north of the site where the land is lower and suitable infiltration exists.
- A new hedgerow is proposed to the north of the access road which would screen views of the road on the approach into the village. If considered necessary, any housing or other built development could be kept in line with the northernmost point of the St Omers Close development to further protect views of the site from the north.
- The reduction in size of the site from the planning application eliminates the need to provide the roundabout and site entrance to the north of Paddock Farm and, therefore, significantly reduces the less than substantial harm upon the Listed Paddock Farm and the entrance to the Conservation Area on the approach from the north.
- The reduction in the size of the site from the previous planning application will also ensure that the extent that the new eastern development edge protrudes to the north of the village will be halved and extend no further north than the existing St Omer Close development. This will significantly reduce the impact of estate scale development on the village.
- The reinforcement of the eastern boundary hedge to provide a minimum 2 metre width hedge along the eastern edge will minimise any impact on views from the public right of ways to the east of the site. This can be supplemented by density transition from low along site edges to higher within central part of the site and the location of bungalows where appropriate along the edges.
- The indicative masterplan contains significant public open space provision. The inclusion of a green space bordering the Church yard responds to Historic England's request for such.
- There are no archaeology, utility services or ecology constraints that preclude development of the site, as confirmed through the previous planning application process.
- The provision of new residential development with easy and safe pedestrian access to the local Primary School will support local services to the benefit of the vitality of the rural area and in direct accordance with National Planning Policy Guidance.
- The provision of a care home responds directly to the identified growing need for elderly care provision within this part of Norfolk.
- Provision of a site for a doctors' surgery enables future flexibility for provision to meet the needs of the whole village.
- The provision of a mix of housing types and tenures, including policy compliant affordable homes will assist in addressing local, rural housing needs.
- The site is of an appropriate scale to be attractive to small to medium sized housebuilders who find it difficult to compete for and deliver larger strategic sites and will provide additional choice to the local housing market.



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- The site has received good interest from local house builders, who offer their support to these representations.
- The site also has the benefit of being located within the Cambridge-Norwich Hi-Tech corridor where it can provide homes to support the creation of hi-tech jobs in line with the GNLP proposed vision for growth.

I trust that the above and enclosed is of assistance to you and your colleagues in concluding the suitability and deliverability of the proposed allocation site.

Yours sincerely

Beccy Rejzek
Associate Director, MRTPI



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Appendix 1 – Previous site plan (March 2018)



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Appendix 2 – Amended Site Plan March 2020