

16 March 2020
Reps to Reg 18 GNLP - GNLP0393 Hainford



Greater Norwich Local Plan Team

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Dear Sirs,

REPRESENTATIONS TO GREATER NORWICH LOCAL PLAN

STAGE C REGULATION 18 DRAFT STRATEGY AND SITE ALLOCATIONS

GNLP0393 – LAND WEST OF NEWTON ROAD, HAINFORD

Savills (UK) Ltd are instructed on behalf of the Diocese of Norwich to submit representations in support of the site identified as 'GNLP0393' within the emerging Greater Norwich Local Plan (GNLP). GNLP0393 was first submitted through the GNLP call for sites exercise in July 2016

This covering letter comprises our representations to the current consultation.

We have reviewed the assessment of the site provided within the GNLP Sites Document, and make the following comments in relation to the site's delivery.

Comments on GNLP0393 – Land west of Newton Road, Hainford

Context

It is first pertinent to review the site within the context of the village's position in the proposed settlement hierarchy and the distribution of growth.

The site is located within Hainford, which is defined by the emerging Greater Norwich Local Plan as a 'village cluster' alongside Stratton Strawless. Hainford and Stratton Strawless are within the administrative boundary of Broadland District Council.

In describing Hainford and Stratton Strawless, the emerging GNLP Sites Document states:

"The catchment of Hainford Primary School brings Hainford together with Stratton Strawless into a village cluster. The school currently has capacity, but is landlocked which would prevent further expansion. In addition to the primary school, services in the cluster include a village hall and public transport service.

Whilst it is considered the cluster could accommodate development of 50-60 additional homes, there are currently no new allocations proposed and no allocations to be carried forward in this cluster. There are however 7 dwellings with planning permission on small sites. No new allocations are proposed but further development is not ruled out. Windfall development policy 7.4 allows an amount of growth in each village cluster that reflects primary school capacity."

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The GNLP Sites Document in its assessment accepts that Hainford and Stratton Strawless could accommodate development of 50-60 additional homes, which would be in general conformity with the Strategy Document which supports new residential allocations in this tier of the settlement hierarchy. Our client would therefore encourage the Council to reconsider the inclusion of land west of Newton Road (GNLP0393) as a proposed allocation given its potential to meet this identified housing need and contribute to the district's overall housing supply.

Below the site is considered against the tests within the NPPG¹, confirming it is suitable, available and achievable for development purposes.

Suitable

Accessibility to Services

Encouraging growth in sustainable settlements within rural areas is in accordance with 2019 NPPF and is considered vital to the long term sustainability of rural communities (NPPF para 78).

Hainford and Stratton Strawless is identified as a 'cluster village' in the Strategy Document. Whilst this is the lowest tier within the settlement hierarchy, it is importantly acknowledged in paragraph 164 part d that, *'the approach to village clusters is innovative. It reflects the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages'*. It is therefore important that proportionate growth occurs in the smaller settlements to ensure that they remain a sustainable location for their residents.

Hainford and Stratton Strawless have a small number of services and facilities including a village hall, primary school and public transport service. These are within easy walking/cycling distance of the site.

The site is located immediately adjacent to Hainford VC Primary School, a Church of England school. The village primary school has a capacity for 87 pupils (Ofsted), although there are currently only 71 pupils attending. The GNLP Sites Document notes that the school is landlocked which would prevent further expansion. On this point our client notes that there has been no indication to date from the school or NCC that there is a need for the school to expand, however should this be the case then the Diocese of Norwich is always open to assisting Church of England schools, being part of the same 'family'. The Diocese of Norwich have already provided the school with a section of GNLP0393 for a car park, which would be incorporated into an overall development plan for the site.

Hainford and Stratton Strawless are also well related to Norwich where a number of facilities and services exist including leisure and employment. They are also located a short distance from strategic highway infrastructure in the form of the A140. There is a bus stop located under 150m from the site. There are three bus routes, the 43, 43A and 44A providing a regular service to surrounding settlements including Norwich.

Townscapes

The site is well related to the existing settlement and to the settlement boundary. Allocating the site for housing would not appear out of character with the existing built form and would physically connect the primary school with the village.

Transport and Roads

Access to the site will be sought via Newton Road (30 mph). An existing access is located adjacent to the primary school on GNLP0393 which provides access to the primary school car park. This access and parking, owned by the Diocese of Norwich, would be incorporated into an overall development plan for the site. It is

¹ Paragraph: 019 Reference ID: 3-019-20140306; Paragraph: 020 Reference ID: 3-020-20140306; and Paragraph: 021 Reference ID: 3-021-20140306

considered that this access could be upgraded to accommodate development of the site with sufficient visibility splays possible to ensure the safe entry and exit of vehicles. Newton Road is a main road running through the village and is largely straight at this point.

Our clients have already installed a TROD type footpath running inside the road frontage boundary of their land to provide safe access to the primary school. This could be upgraded as part of the development of the site.

Landscapes

The site is neatly bounded by trees and hedging along its boundaries which largely screen the site from the surrounding countryside. Whilst having some intrinsic value, due to the site's largely enclosed nature, it is considered that it does not make a significant contribution to the wider landscape character.

Drainage

The site is identified as being subject to surface water drainage issues as set out within the GNLP Sites Document, however it is important to note that flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding.

With respect to land west of Newton Road, Environment Agency based surface water flood mapping indicates that a section of the site through its centre is susceptible to low level surface water flooding. Low risk means that each year this area has a chance of flooding of between 0.1% and 1%.

Further investigation into site specific drainage issues could be undertaken, however there are no known reasons why a Sustainable Urban Drainage System (SUDS) could not be incorporated, thus addressing any pressures on site drainage and runoff patterns. Any allocation in the GNLP could incorporate measures to ensure special consideration is made by the developer in implementing the drainage strategy to ensure that the surface water drainage at this location is addressed and mitigated, without increasing risk to other areas of the site or to off-site areas.

Other Comments

There are few physical limitations or constraints on the site which would make development of the site difficult or unacceptable. The site is not located within Flood Zones 2 and 3 and is not subject to any PROW which may affect development of the site.

Available

The site is considered available for development being within the control of a single owner. Should the site be accepted as an allocation for residential development, Savills would be able to act on our client's behalf with a view to identifying a suitable development partner as soon as possible.

Achievable

As noted above, there are no known major technical constraints relating to the site and therefore it is considered its development would be economically viable. Services including electricity, mains water, foul sewerage and telecommunications are available.

There are no other known factors that mean development would be difficult or unachievable. Therefore, it is clear that this site presents a deliverable option for housing and could make a material contribution to the housing targets of the district.



Conclusions

It is considered that land west of Newton Road (GNLP0393) is sustainable and deliverable as defined by the NPPF, and a suitable location for residential development. The site, within the ownership of the Diocese of Norwich, represents an attractive option for housing growth within the District.

I would be grateful if you could keep me updated in relation to the next stage of the Local Plan process and, reserve the right to appear at the Examination sessions, if required, when they take place.

Please do not hesitate to contact me should you require any further information.

Yours faithfully,

Gareth Watts MRTPI
Planner