

16 March 2020
Reps to Reg 18 GNLP - GNLP0395 Hingham



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

GNLP0395 – LAND WEST OF ATTLEBOROUGH ROAD, HINGHAM

Savills (UK) Ltd are instructed on behalf of the Diocese of Norwich to submit representations in support of the site identified as 'GNLP0395' within the emerging Greater Norwich Local Plan (GNLP). GNLP0395 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 sites delivery. We have further reviewed Hingham's draft allocations as identified within the Site Allocation Document with a view to assessing their suitability for allocation. Lastly we have reviewed Hingham's sustainability and its ability to accommodate increased levels of growth.

Hingham is within the administrative boundary of South Norfolk District Council.

Comments on GNLP0395 – Land west of Attleborough Road, Hingham

Below the site is considered against the tests within the NPPG¹, confirming that the site 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).

Hingham is identified as a 'key service centre' in the GNLP Strategy Document. Key service centres are identified by the GNLP at paragraph 333 as having '*a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas*'. Hingham has services and facilities including a primary school, GP practice, public house, community buildings, employment

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



opportunities and a food shop. These are within easy walking/cycling distance of the site connected by a pedestrian footpath.

Hingham is well related to Attleborough and Wymondham where a number of facilities and services exist including leisure and employment. It is also located five miles from strategic highway infrastructure in the form of the A11. Furthermore, there is a bus stop located under 150m from the site which is served by four bus routes, the 3, 6, 13 and 17 providing regular bus services to surrounding settlements including Norwich.

Townscapes

The site is well related to the existing settlement and is adjacent to the settlement boundary. Allocating the site for residential development would not appear out of character with the existing built form and would physically extend the village no further than the development seen along Hall Moor Road to the east of the Coppice.

Historic Environment

Acknowledging that the site is adjacent to the Hingham Conservation Area, there is nothing to suggest that an appropriate development could not be brought forward on the site if careful consideration is given to the designated heritage asset and its setting in the design stage. When considering the impact on heritage assets, it is considered that the public benefits associated with the development of this site would weigh strongly in favour of its development.

Transport and Roads

Access to the site will be sought via Attleborough Road. Attleborough Road, which is a primary route into the town appears to have sufficient width at this point to accommodate development of the site. If required there is sufficient land available within the site and highway boundary to allow this section of road to be widened. A footpath runs along the length of the roadside frontage connecting the site with the town. It is considered that an access with sufficient visibility and a widened footpath could be installed as part of any development with sufficient land available within the site and highway boundary. Some hedgerow may need to be removed to accommodate a new access and visibility splays, however it is considered that this could be replanted as part of the sites development. With respect to any potential impact upon protected species, this would be addressed by way of appropriate protected species surveys and the implementation of appropriate mitigation, undertaken and produced by a CIEEM registered ecology consultants. Where possible, biodiversity net gains would be sought in line with the NPPF.

Alternatively vehicular access could be taken via GNLP0335 and GNLP0298 as part of a wider strategic allocation.

Landscapes

The site is neatly bounded by extensive mature trees and hedging along its boundaries which aid in screening the site from the surrounding countryside. Whilst having some intrinsic value, it is not considered that the site makes a significant contribution to the wider landscape character.

Drainage

With respect to surface water drainage, 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.

Other Comments

There are few other 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.

It is noted that Hingham Town Council made comments regarding the provision of land for the extension of Hingham Cemetery, and the provision of a car park to be used in conjunction with the cemetery and users of the Church. Noting this, it is considered that an allocation could bring forward an area of land for the extension of the cemetery and/or church car parking. The Diocese of Norwich as part of the Church 'family' and as sole owners of the site, would always look to assist the Church and other local partners in addressing local needs where they can.

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.

It is considered that all or part of the site could come forward for development.

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 of the site 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.

Comments on Draft Allocation GNLP0503

In describing draft allocation GNLP0503, the GNLP Sites Document states:

"This site is proposed for allocation on a reduced boundary. Development of up to 20 dwellings would be acceptable subject to provision of a safe access and a continuous footway at the west side of Dereham Road from the site access to Pottles Alley. A 30mph speed limit extension would be required to include the site frontage. Minor carriageway widening may also be required."

Following a review of the site, our clients have concerns regarding for the inclusion of GNLP0503 as an allocation for the town.

Firstly, it is unclear how access will be achieved. The draft allocation 'Policy GNLP0503' indicates that access will be taken via Dereham Road, however the policies map indicates that the draft allocation does not connect with the highway boundary being intercepted by the garden of No. 34 Dereham Road. This anomaly would impact upon the delivery of the site and should be clarified.

Assuming access to the site is possible via Dereham Road, in its present state it seems unlikely that the road would be able to accommodate development of the site without upgrade works including carriageway widening. Equally Dereham Road has no pedestrian footpaths at this point to enable pedestrians to safely access the facilities in the town. The proposed access is located approximately 80 metres from the nearest footpath. The provision of road widening and a public footpath may mean infrastructure costs are higher than on other sites where access is already suitable or could be made so in a relatively straightforward manner.

In addition, the proposed access point immediately abuts the garden of No. 34 Dereham Road, and would be located in close proximity to one of its principle elevations. The introduction of vehicle movements associated with at least 20 new dwellings in this location has the potential to have an impact on residential amenity.

It is therefore considered that the inclusion of this site would not be in accordance with paragraph 108 of the NPPF, which states that:

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users; and

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”

It is considered that ‘GNLP0395’ land west of Attleborough Road represents a more realistic and attractive option for development in Hingham over the plan period, whether it comes forward in full or in part. The site is considered to be suitable, available and achievable for development as set out above.

Comments on Hingham’s Suitability for Growth

Whilst our client supports the GNLP growth strategy, they would like to highlight the benefits of bringing forward larger allocations in the town of Hingham. It is considered that providing larger allocations, and subsequently increased housing numbers within Hingham presents a more viable and achievable approach to growth. It will be particularly important should those allocations proposed at present be delayed or fail to be deliverable in the early years of the plan. Providing larger sites would ensure the local plan has flexibility with its allocations, ensuring that there would be sufficient land allocated in the town to meet growth targets.

As set out above, Hingham is identified as a ‘key service centre’ with a good range of services and facilities including a primary school, GP practice, public house, community buildings, employment opportunities, food shop and public transport facility. Residential growth in the town of Hingham would contribute towards the growth and preservation of these services helping to support and enhance the vitality of the community and contributing to the local economy in line with Paragraph 78 of the NPPF which promotes the sustainability of rural communities.

Furthermore, additional local income and employment would be created for both individuals and businesses involved in the construction elements of any development. It is also considered that any construction workers and local trades will make use of local services and facilities during the construction period. In the long-term it is likely trades people will be required to help maintain any properties.

Other factors which would be amplified by a larger allocation include site preparation costs. These would generally be the same for smaller allocations as slightly increased allocations, and therefore cost efficiencies can be achieved on larger schemes. As a result, larger sites will be more attractive to a wider range of development partners which is an important factor in ensuring that allocated sites are delivered in a timely manner, within the first five years of the plan. Equally larger sites would mean a greater proportion of affordable housing coming forward helping to address affordable housing needs and would help attract an RSL provider. It would also further contribute to the District’s housing supply.

Conclusions

It is considered that the land adjoining land west of Attleborough (GNLP0395) 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.

Our client has concerns regarding the draft allocation GNLP0503 on grounds of highway infrastructure and delivery, and would therefore suggest that ‘GNLP0395’ land west of Attleborough Road represents a more

realistic and attractive option for development in Hingham over the plan period, whether it comes forward in full or in part.

Lastly, whilst our client supports the GNLG growth strategy, our client believes there would be significant benefits in bringing forward larger allocations in the town of Hingham.

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