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Greater Norwich Growth Board

Dear Sirs

Greater Norwich Local Plan Regulation 18, Stage C Draft Strategy and Site Allocations – New Stanfield Garden Village at Hethel.

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 at Hethel. The land is being promoted for a new Stanfield Garden Village by Glavenhill on behalf of the landowner. These representations should be read in conjunction with Glavenhill's responses to other consultation questions, particularly those relating to the vision and objectives for Greater Norwich (Qu 6), The delivery of housing (Qu 9) the delivery of economic development (Qu 10) the delivery of infrastructure (Qu 11), the sustainable growth strategy (Qu 13) and the approach to housing numbers (Qu 14).

The 351ha Hethel site, which straddles the B1135 Wymondham Road to the south west of the Lotus site and the Strategic Employment allocation at Hethel was promoted through the Greater Norwich Local Plan Regulation 18, Stage A Site Proposals and Growth Options process in March 2018 (site reference GNLP1055) - see **Appendix 1** for site boundary.

Additional information, confirming the suitability of the site and its availability and deliverability, was submitted to the GNGB in June 2019. This submission comprised a Vision and Delivery document demonstrating how the site could accommodate circa 6000 residential units, 28 ha of employment space, 3 new primary schools and a secondary school, a village centre and 3 local centres, a 69 ha Country Park, a new Wetland Park and an Energy Park providing renewable energy for the new community. It confirmed that the first phase of the development (1855 units plus primary school, local centre, first phase of employment and green infrastructure) could be delivered in the new plan period to 2038. The comprehensive document was accompanied by technical assessment reports demonstrating that there are no overriding site constraints to development in respect to ecology, heritage and archaeology, ground conditions, utilities, highways, noise, flood risk and drainage, transport and landscape.

These representations

These latest representations are made in response to the current GNLP Regulation 18, Stage C Draft Strategy and Site Allocations process.

The draft plan does not allocate the site but identifies it as a 'Reasonable Alternative'. It states: *"This site is promoted as a new garden village. It is considered to be a reasonable alternative for consideration as a new settlement through a future review of the plan. The site is not preferred for*

allocation as it is not proposed to include a new settlement in the Greater Norwich Local Plan at the current time.”

Glavenhill consider that a new Garden Village at Hethel should be allocated now. However, they support paragraph 167, which recognises the potential for a longer-term new settlement, provided this is located within the Cambridge-Norwich Tech corridor.

Glavenhill believe that the choice to not allocate the Stanfield Garden Village site at Hethel within this plan period is a missed opportunity. Identification of a first phase of development on this site within the plan period would provide a clear commitment to delivering the plan’s stated Vision and a clear means to meeting that Vision in a sustainable manner.

Glavenhill is generally supportive of the overall Vision for the plan period. We support paragraph 108 which states:

“our aim is that it will support growth of a diverse low carbon economy which will compete globally through its world class knowledge-intensive jobs in the Cambridge Norwich Tech Corridor”.

They also support the ambition set out in paragraph 119 that:

“Most new homes will have been built in and around Norwich and in the Cambridge-Norwich Tech Corridor.”

However, they are not convinced the plan will deliver on this vision for reasons set out in detail in our answers to questions 13 and 14 in particular. Only 100 new homes (new allocations) are proposed within the Cambridge-Norwich Tech Corridor itself. Too great an emphasis is placed upon dispersal of growth to as yet unidentified sites in rural cluster villages in South Norfolk and to towns like Diss and Harleston, outside of the Cambridge-Norwich Tech Corridor and the Strategic Growth Area. Although it is recognised that these locations should accommodate some additional housing growth, this should not take precedence over redirecting the policies in the new plan beyond those in the JCS to ensure that there is a real new focus and commitment on meeting the stated vision for the Strategic Growth Area and Cambridge -Norwich Tech corridor.

It is proposed that numbers in Diss should be halved to 200 and numbers in Harleston, which is also well outside of the Tech corridor and Strategic Growth Area, should be reduced to 150. The displaced 500 homes should be relocated within the Tech Corridor/ Strategic Growth Area including within a new settlement at Hethel. 500 of the 1200 homes proposed for small cluster villages in South Norfolk should also be redirected to the new settlement at Hethel within this plan period, with more beyond.

This approach would clearly support the ambition to provide most new homes in and around Norwich and within the Tech corridor and would provide land and homes to expand and support the opportunity for hi-tech engineering jobs within the Tech corridor. Such an approach would help provide a ‘Sustainable Growth Strategy’ and a development hierarchy that focusses growth on the most sustainable locations within the Strategic Growth Area. The current over emphasis on potential rural allocations in the bottom tier of the settlement hierarchy and overly large allocations in Diss and Harleston makes the strategy unsound in its current form.

Glavenhill's proposed approach would also provide a more sustainable approach to delivering required community infrastructure, as planning at scale can deliver new schools, doctor's surgeries and other community facilities that significant small-scale rural dispersal cannot.

Our previously submitted Vision and Delivery Document has provided detailed information regarding the availability and deliverability of the Stanfield Garden Village site together with the opportunities and benefits that would arise through its allocation. These representations go on to provide a summary of these key benefits:

Summary of Development Offer

- The site is under the ownership of one willing landowner and the promotor has a promotion agreement with the landowner covering the site;
- The site is deliverable. Residential values and demand along the A11 corridor are both robust. There is little necessity for upfront infrastructure provision. Its proximity to existing services in Wymondham can support the new Garden Village in its early stages of development and repay that support in the future. In addition, the Government have committed in the recent budget to help forward fund infrastructure where necessary;
- The site has excellent access from an existing underused junction onto the A11, requiring minimal transport infrastructure costs at the early stages of development, a feature no other new settlement site has in terms of road access;
- It is physically linked to the existing hi-tech employment area at Hethel ensuring quality employment opportunities can be integrated and expanded from the outset to contribute in a positive and visible way to the ambitions for the Tech Corridor;
- It provides a unique opportunity to deliver innovative, integrated and sustainable transport infrastructure and systems and there is an excellent pedestrian cycle link directly into Wymondham Town Centre using an existing footbridge over the A11, as well as access to rail;
- The flat topography lends itself to efficient development and the potential for large scale renewable energy generation to help create a very low carbon community;
- It can provide bespoke, rather than retrofitted infrastructure from the outset including digital connectivity;
- This site can provide a 69ha Country Park and an Energy Park within identified priority habitat enhancement and recreation areas, in addition to policy compliant public open space;
- It can deliver wetland ecological enhancements within the sub regional Green Infrastructure corridor 4;
- It can deliver an identified Green Infrastructure priority habitat link connecting Breakers Yard Meadow County Wildlife Site (CWS) with 'The Lizard' CWS and Silfield Newt Reserve CWS along the River Tiffey corridor;
- It can improve the Kett's Country Walk route by incorporating it into an area of new wetland creation along the River Tiffey;
- Planning at scale enables key infrastructure such as new schools, healthcare and public transport provision to be planned from the outset and delivered;
- It will provide for a balanced, inclusive community that incorporates opportunities for education, youth, workers and the ageing population;



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- Politically it can be advantageous to engage communities on a single larger proposal rather than a number of smaller edge of settlement schemes, reducing the need to keep sourcing smaller parcels for development. The cluster village approach might be appropriate to help meet housing needs for this plan period but there is a need to look beyond it and small-scale sites cannot realistically continue to deliver significant housing long term;
- Any negative impacts on the environment can be dealt with in a holistic way, with avoidance, mitigation and enhancement considered at the outset and integrated into the design;
- It can be part of a long-term plan where trajectories can be agreed and local authorities can play a crucial role in ensuring that the development proceeds in line with a series of core values and principles, linked to good governance, long term stewardship and infrastructure funding;
- The technical assessments have demonstrated that there are no over-riding constraints to development;
- All of the GNLP New Settlement assessment criteria (GNLP New Settlements Topic paper) can be met; and,
- The site has received good interest from house builders, who offer their support to these representations.

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 for a new settlement.

Yours sincerely

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Associate Director, MRTPI



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Appendix 1 – Site Boundary Plan