

Ref: GA/AM/03715/L0013am

16th March 2020

Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX

By email: gnlp@norfolk.gov.uk

Dear Sir / Madam,

**Greater Norwich Local Plan – Regulation 18 Draft Plan Consultation
On behalf of Westmere Homes Ltd**

We write to you on behalf of our client Westmere Homes Limited and specifically we wish to make representations to the Greater Norwich Local Plan (GNLP) Regulation 18 Draft Plan Consultation. In particular we wish to make comments on both the housing targets set out in the plan alongside the proposed distribution of growth across the settlement hierarchy.

To date our client has been fully involved in the ongoing consultation on the GNLP having responded to each of the previous rounds of consultation to date since 2016 in respect of their land at North East Aylsham (your site reference GNLP0336). Along with Saltcarr Farms Limited our client also has a development interest in land at Harvest Close, Hainford (your site reference GNLP2162). Both sites were discussed in detail at a recent productive meeting with both GNLP officers and a representative of Norfolk County Council (NCC) Highways on Thursday 5th March 2020.

Whilst this letter serves as an overarching response to the general policies of the draft GNLP we are also pleased to include further detailed submissions in respect of the suitability and deliverability of the sites listed that draw on the recent recommendations made by officers. These submissions, included as **Annexes 1 and 2** of this letter respectively, will also draw on our conclusions reached and recommendations made in respect of a variety of the strategic policies of the plan.

Specifically, we are pleased to provide comments in response to the following questions included within the draft strategy:

- **Question 13:** Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?
- **Question 14:** Do you support, object or wish to comment on the approach for housing numbers and delivery?
- **Question 41:** Do you support or object or wish to comment on the approach for the mains towns overall? Please identify particular issues.

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- **Question 42:** Do you support or object or wish to comment on the approach for specific towns (Aylsham, Diss (with parts of Roydon), Harleston, Long Stratton and Wymondham)? Please identify particular issues.
- **Question 45:** Do you support or object or wish to comment on the overall approach for village clusters? Please identify specific issues.
- **Question 46:** Do you support or object or wish to comment on the approach for specific village clusters? Please identify particular issues.

Question 13: Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?

As a start point, we broadly agree with the classification of settlements within the hierarchy itself. In particular we are pleased to acknowledge that Aylsham is identified as one of the principle settlements of the plan area, falling on the second tier of the hierarchy as a 'Main Town' and comprising a location for growth that is second only to Norwich itself in terms of importance.

We do, however, have concerns in respect of the proposed distribution of growth. In particular we are concerned about the continued reliance placed on strategic sites within the Norwich urban area as well as the proportionally significant level of growth to be directed towards South Norfolk's Village Clusters.

The strategic sites issue is pertinent due to the chronic under-delivery of existing large allocations adjacent to and within the Norwich urban area, a matter which by Norwich City Council's own admittance must be acknowledged by the plan¹. The 2018/19 monitoring year was the first since the start of the Joint Core Strategy (JCS) plan period to see delivery in the Norwich Policy Area (NPA) meet its annual housing requirement. Otherwise, growth in the NPA took around 10 years to gather pace with exceptionally slow delivery in the first eight years of the plan period, as shown in the table below:

Table 1: Annual and cumulative delivery in the NPA since the adoption of the JCS

Year	Requirement	Delivery	Surplus / Deficit (cumulative)
2008/09	1,825	1,193	-632 (-632)
2009/10	1,825	923	-902 (-1,534)
2010/11	1,825	910	-915 (-2,449)
2011/12	1,825	915	-910 (-3,359)
2012/13	1,825	882	-943 (-4,302)
2013/14	1,825	992	-833 (-5,135)
2014/15	1,825	1,140	-685 (-5,820)
2015/16	1,825	1,164	-661 (-6,481)
2016/17	1,825	1,810	-15 (-6,496)
2017/18	1,825	1,685	-140 (-6,636)
2018/19	1,825	2,440	615 (-6,021)
Total	20,075	14,054	

This lag in delivery during the early years of the plan is representative of the significant lead in times associated with large-scale strategic sites and stands to be replicated once again in the event that the reliance on large sites in and around the Norwich urban area is maintained by the GNLP.

¹ Report to Norwich City Council Sustainable Development Panel, 15th January 2020 (available at: <https://cmis.norwich.gov.uk/live/Meetingscalendar/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/776/Committee/9/SelectedTab/Documents/Default.aspx>)

The level of growth to then be directed to South Norfolk's rural area raises two separate concerns. The first relates to the current complete lack of evidence assessing to the availability and deliverability of sites across the smaller villages of the district. The absence of such evidence means that the direction of such a high proportion of growth towards South Norfolk's village network – currently proposed at 1,200 homes or 15.5% of all residual growth – represents a strategy that is neither justified nor even demonstrably deliverable. The second concern is that such a high level of growth in the rural area is entirely unsustainable (by comparison the main town tier, the second highest tier of the hierarchy comprising the most sustainable non-urban settlements, is only proposed to receive 50 more homes than South Norfolk's villages).

To avoid further issues in respect of deliverability (a concern relating to the levels of growth directed towards both the Norwich urban area and South Norfolk villages tiers) whilst ensuring development is directed to sustainable locations, it is our clear view that a higher proportion of the housing requirement should be directed to deliverable sites at the Main Towns. Aylsham in particular represents a sustainable settlement with at least three medium-scale deliverable housing options (we consider our client's site to be principle amongst them – see **Annex 1**) that would provide a significant contribution towards the growth needed across Greater Norwich. As it stands, and in light of these concerns, we recommend that the current proposed distribution of growth should be recast to reflect the suitability of the Main Towns. Resultantly, this tier of the hierarchy should receive a notably increased level of growth.

Regardless of the current approach to the distribution of growth, and as set out in our response to Question 14 below, it is our view that the proposed housing figure will also require a significantly uplift to account for City Deal and Tech Corridor growth commitments. To ensure the plan successfully allocates a range of additional sustainable and – vitally – deliverable sites that are able to meet an increased need for new homes from the earliest years of the plan period we consider that a large proportion of this additional growth will inevitably need to be met on unconstrained sites at the larger settlements of the hierarchy.

We therefore strongly suggest that the Main Towns should play a prominent role in meeting these additional needs. The identification of deliverable sites at the five Main Towns should be the priority due to the sustainability benefits these settlements offer, allied with their clear capacity to grow. These opportunities should then be complemented by additional sites across the remainder of the hierarchy in instances where it is clear development is deliverable and would result in wider sustainability benefits.

Question 14: Do you support, object or wish to comment on the approach for housing numbers and delivery?

We have concerns in respect of the housing strategy set by the plan, both in terms of the basic housing target and the way in which these are to be delivered. In short, these concerns relate to the less than aspirational housing figures included in the plan and a failure to recognise the significant growth that an escalation in local job creation will place on the housing market.

Fundamentally we consider that the plan should be doing more to seize on the challenges and opportunities presented by two key economic growth strategies in the region, ensuring that their ambitions can be achieved. Currently the baseline housing need for the plan period 2018-2038 is 40,541 new dwellings representing Greater Norwich's Local Housing Need (LHN) devised using the government's Standard Methodology. This approach is in line with the NPPF's **minimum** requirements described at paragraph 60 of the Framework.

The plan then proposes to identify sufficient allocations to achieve this requirement plus an additional 10% buffer, required by paragraph 73 of the NPPF to "*account for any fluctuation in the market*" during the course of the following year. Essentially the plan's housing requirement comprises close on the bear minimum policy-compliant

figure required by the NPPF and certainly does little to recognise additional known factors that will no doubt influence the demand for new homes across the plan area.

Indeed, Planning Practice Guidance (PPG) reaffirms that the standard method provides a minimum starting point in determining the number of homes needed in an area and that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. The PPG then advises that circumstances where setting a higher housing requirement may be appropriate would include the following two scenarios:

- *"growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); (and)*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally..."*

Both of these factors are in play in respect of the GNLP.

Firstly, the ongoing Greater Norwich City Deal includes the commitment of the Greater Norwich Growth Board to secure significant infrastructure funding totalling £440 million along with the delivery of 3,000 additional homes at the city by 2026. Whilst it is recognised that the development requirements of the Deal have been facilitated in part by the allocation of 3,000 additional homes in the adopted Growth Triangle Area Action Plan (GTAAP) the delivery of these strategic housing sites has been slow. To this end the emerging GNLP offers the opportunity to provide fresh stimulus to achieving the ambitions of the City Deal prior to 2026 to make up for any shortfall in new jobs and housing.

It does not, however, appear that the plan has grasped this opportunity. Indeed, Norwich City Council in its report to its Sustainable Development Panel on 15th January 2020, raises identical concerns, stating that *"the level of growth proposed in the GNLP is considered insufficient to address the growth needs of Greater Norwich as a whole and the Norwich Urban Area in particular, and lacks the ambition expressed through the previous Joint Core Strategy and the Greater Norwich City Deal"*.

Secondly, it is vital that the GNLP responds to the ambitions of the Cambridge Norwich Tech Corridor (CNTC), the vision of which seeks to attract 26,000 additional jobs and 46,000 further residents to the corridor prior to 2031. At this stage it is apparent that, whilst the CNTC proposals would be hugely positive for the city area, they currently represent what is still little more than an aspirational programme for growth with limited delivery mechanisms in place. This is where the GNLP must play a major role in making the CNTC vision a reality.

To the plan's credit it is noted that the spatial distribution of growth included in the draft strategy orientates a high proportion of the plan area's homes towards the corridor. What is a concern, however, is that the overall housing target for the plan fails to recognise that the CNTC proposals, and the significant investment and jobs growth that will hopefully come with them, will likely result in an increased housing demand above and beyond the baseline requirement calculated using the Government's Standard Methodology. The strategy of skewing the delivery of new homes which are already required to meet the needs of the local population towards the corridor to satisfy the CNTC's aspiration does not represent a positive planning response. Instead this will simply create an imbalance in housing delivery across the plan area.

One of the options put forward in the previous Regulation 18 GNLP consultation in March 2018 was to provide an additional uplift in the housing requirement to take account of the City Deal. However, this approach was discounted as it was considered that the uplift applied built into the LHN figure (i.e. that proposed to tackle local issues in respect of affordability) was sufficient swell to accommodate the demands of the City Deal. Assessment of this approach did not even consider the additional implications of the CNTC. We were strong advocates of the City Deal uplift then – little has changed to lead us to alter this view. To simply maintain a figure close to the

basic LHN as the need housing figure for the plan demonstrates a critical misunderstanding of the way in which the figure is calculated. Indeed, the absence of an appropriate uplift fails to reflect the fact that the standard method is a 'policy off' calculation of the housing requirement and any adjustments required to due to 'policy on' decisions (i.e. to sign a City Deal) should be factored in further.

Indeed, we note that the SHMA published in April 2017 identifies that the jobs growth facilitated by the City Deal would likely result in a demand for approximately 8,361 new homes above and beyond those required as a result of general demographic change over the period until 2036. Even when deducting the 3,000 dwellings planned for in the GTAAP this results in an additional requirement of 5,361 homes that appear not to have been considered when setting the GNLP housing requirement.

On this basis we consider that the OAN proposed by the plan falls short of adequately responding to local demand by an approximate 5,400² homes. This is before the additional demand generated by the CNTC is taken into account. In which case the **absolute minimum** housing requirement for the GNLP should be somewhere in the region of 46,000³ dwellings before any NPPF paragraph 73 buffer is applied. In which case it is our view that upon the application of the appropriate buffer the GNLP should be planning for somewhere **between 48,300 and 50,600⁴ dwellings as a minimum** based on the demand generated by the City Deal alone. In addition, we would urge officers to undertake the work necessary to quantify the impact of the CNTC – the draw of the Corridor will inevitably result in the eventual housing figure rising further.

Question 41: Do you support or object or wish to comment on the approach for the mains towns overall? Please identify particular issues.

Question 42: Do you support or object or wish to comment on the approach for specific towns (Aylsham, Diss (with parts of Roydon), Harleston, Long Stratton and Wymondham)? Please identify particular issues.

These questions are taken together.

To reiterate our response to Question 13 we have concerns in respect of the comparatively low level of growth that is to be directed towards the Main Towns, a tier of the settlement hierarchy that historically yields sites that benefit from ease of delivery whilst lying in demonstrably sustainable locations. It must be remembered that the five main towns form the second highest tier in the settlement hierarchy and represent the most sustainable locations for new homes away from the Norwich urban area yet are allocated just 14.5% of total proposed growth over the plan period. It is a concern that the current strategy appears to somewhat arbitrarily constrain growth at these settlements and fails to take full advantage of the combination of deliverable sites, high levels of service provision and strong infrastructure connections present at each town.

Officers will note that our responses towards the earlier stages of the GNLP concluded that the Main Towns should realistically be expected to accommodate a far greater level of growth than currently, approximately 2,750 new dwellings across the tier. This results in an average figure of 550 homes per settlement, albeit it is acknowledged that some of the towns have a greater capacity to grow than others. In respect of Aylsham specifically our response to the Growth Options Consultation in March 2018 concluded that, due to the high levels of sustainability and accessibility it offers allied with the availability of suitable and deliverable housing sites, it would not be unreasonable to direct approximately 750-1,000 new homes towards the town. Our views in this respect remain unaltered.

² 5,361 dwellings rounded up to the nearest 100

³ LHN of 40,541 dwellings plus 5,400 uplift rounded up to nearest 100

⁴ Range calculated on the basis of a 5% and 10% buffer, in response to paragraph 73 of the NPPF

However, it is apparent from the 'Housing' table included as part of Policy 7.2 of the 'Draft Strategy' document that the total proposed housing to be allocated at Aylsham over the plan period falls well below this figure at only 300. In terms of cumulative growth (including existing commitments) the level of delivery at Aylsham would be the lowest of the five settlements comprising the Main Town tier. This is despite Aylsham comprising the fourth largest settlement in the plan area allied with a range of demonstrably deliverable and highly accessible sites at the town. It is also set to receive a lower level of allocated growth than both Diss and Harleston.

Indeed, Aylsham is described at paragraph 312 of the GNL as having a good range of shops and services as well as strong transport links to Norwich. Meanwhile, Harleston (which is to receive a greater level of growth both by way of allocation and cumulatively over the plan period) is characterised as having shops and transport links designed to meet a localised catchment only. To this end the level of growth now proposed at Aylsham appears disproportionately low when the sustainability of the town and its capacity to meet the wider needs of the Greater Norwich area are both considered.

It is also noted that Anglian Water now has plans to increase capacity at the Aylsham water recycling centre, an infrastructure constraint that has held back the town's ability to grow in recent times. Indeed, the January 2018 consultation document identified the capacity of the local water treatment capacity as the only real brake limiting the growth of the town. Otherwise the same document describes Aylsham as a town benefitting from strong market interest, thus demonstrably enhancing the case that sites at the town are attractive and deliverable. It is therefore our view that there is no good reason to arbitrarily limit the growth of Aylsham in the event that sustainable and deliverable sites at the town can be identified.

On this basis we are pleased to reiterate, and indeed reinforce, the availability of our client Westmere Homes' land at North East Aylsham (site reference GNL0336). This represents one of three sites that we understand officers consider to comprise suitable locations for the delivery of approximately 300 dwellings at the town. In fact, it is our clear view that our client's site – currently identified within the evidence base of the GNL as a reasonable alternative – represents by far the most suitable site for the delivery of meaningful growth at Aylsham. Additional evidence describing the deliverability, suitability and overall sustainability of the site is included at **Annex 1** of this letter.

Regardless, on the basis of our analysis set out above we consider that there is a compelling case for more than one site to come forward at the town with a view to delivering far in excess of the 300 dwellings currently proposed by the GNL.

Question 45: Do you support or object or wish to comment on the overall approach for village clusters? Please identify specific issues.

Consistent with our views set out above we consider that the GNL should seek to take an evidence-based approach towards the identification of the capacity of every settlement across the plan area to accommodate growth. Where sites are identified that are both deliverable and can enhance the sustainability of a settlement through the delivery of a proportionate number of new homes they should be identified as allocations in the plan. This process should be indivisible from the exercise undertaken to inform the spatial distribution of growth across the plan area.

We are pleased to see that such an evidence-led process has been closely observed in directing growth towards the Village Cluster tier across Broadland. The profile of each cluster across the district provided as part of the evidence base of the plan takes a clear stepped approach to identifying site allocations. This is done by firstly identifying the capacity that exists in the local community infrastructure; then considering whether there are any additional development constraints applicable to the village or cluster; and finally through an assessment of whether appropriate sites exist within each cluster to deliver an appropriate level of growth up to the level of

capacity offered by the local primary school in particular.

This process has resulted in the identification of proposed allocations at 10 of the 25 Village Clusters across Broadland. Of these, five of the clusters have been allocated between 10-20 dwellings, eight will receive between 20-40 dwellings and two will host a range of 40-60 dwellings. This identification of suitable sites has then informed the level of growth to be directed towards Broadland's network of clusters – stated as 480 dwellings.

Whilst Hainford / Stratton Strawless represents one of the 10 Village Clusters not proposed to receive any growth we are pleased to confirm that our client's proposal at Harvest Close, Hainford (site reference GNLP2162) is now able to overcome the single principle constraint at the village that led to the current decision not to direct growth towards the cluster. Our client's revised proposals are explained in detail at **Annex 2**. Importantly, as the housing figure for the Village Cluster tier has been formulated through a 'bottom-up' approach (that is, through the identification of suitable sites rather than by way of an arbitrary apportionment of growth) it is clear that additional sites can be identified at this tier without conflicting with the GNLP's spatial strategy.

By comparison, the approach proposed in respect of South Norfolk's Village Clusters is far from evidence based and, in contrast to the methodology applied at Broadland, seeks to prescribe the network an arbitrary growth figure of 1,200 dwellings. The draft GNLP then indicates that allocations to meet this requirement across South Norfolk's villages will be identified in a separate plan to be produced by South Norfolk District Council at a later date. This strategy is speculative and uncertain in nature and risks placing an onerous requirement on South Norfolk to allocate sites that are either undeliverable or unsustainable – or potentially both. Put simply, there is no evidence currently available to suggest that the district's villages comprise sites that can appropriately accommodate what is a strategic level of new growth.

This approach significantly undermines strategic approach to delivery in these settlements and cannot be considered to be in accordance with paragraphs 17 – 22 of the NPPF which make clear that strategic policies should provide a clear strategy for bringing sufficient land forward to address objectively assessed needs over the plan period. The scale of growth that must be delivered through the district's Village Clusters plan (1,200 homes, representative of almost 15% of all new allocations across the Greater Norwich area) is clearly of strategic importance in the context of the GNLP.

To defer the identification and allocation of sites to meet such a significant level of growth to a future plan without an assessment of the ability of the villages it covers to accommodate new homes is clearly a flawed approach. We consider that in order to accord with the NPPF, allocations in the village clusters must be brought back into the GNLP and based on a thorough assessment of need and capacity. In turn, this may (and arguably should) result in the redirection of a proportion of this growth either towards Broadland's village network or more suitably to higher tiers of the hierarchy.

Question 46: Do you support or object or wish to comment on the approach for specific village clusters? Please identify particular issues.

Our clients, Westmere Homes Ltd and Saltcarr Farms Ltd, jointly have an interest in land at Harvest Close, Hainford (GNLP2162). Upon review of the Site Assessment booklet for Hainford it is without dispute that our clients' land represents the most sustainable and appropriate location for residential development at the village. It is clear, however, that any growth at the village is considered to be constrained by poor pedestrian access to the local primary school, a facility which is considered to represent the core of the Hainford / Stratton Strawless Village Cluster.

On this basis we are pleased to conclude that, following further analysis of how this constraint may be mitigated, our client's proposals now include a significantly enhanced pedestrian route providing safe access from both the

site and the wider village to the school. This upgrade in connectivity would represent a clear sustainability benefit that would help the village realise its potential to accommodate the 40-60 dwellings identified in the Village Cluster background paper. It would also ensure that best use is made of the capacity that currently exists on the primary school's student role⁵.

The way in which this enhanced pedestrian link would be secured, along with an updated analysis of our clients' site, is set out at **Annex 2**.

We trust that these comments will be given due consideration and look forward to participating further as the Local Plan preparation progresses. If you require any clarification in respect of the points raised or any further information in respect of either of our clients' sites then please do not hesitate to contact me.

Yours sincerely

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⁵ Currently the school is only just above 80% capacity with a role of 71 pupils in total. Source: <https://reports.ofsted.gov.uk/provider/21/121041>

Annex 1: Land at North East Aylsham (Site Reference GNLP0336)

Background

Following on from our general comments in respect of the draft GNLP strategy we are keen to build on our client, Westmere Homes', previous submissions in respect of their land at North East Aylsham. This response and update to our client's proposals follows a review of both the evidence base of the GNLP, including all of the various site assessment papers, and a constructive meeting with both GNLP and NCC officers on 5th March 2020.

We are pleased to note that our client's land has been identified as a 'Reasonable Alternative Site' at Aylsham, a classification that officers confirmed means that the suitability and deliverability of the site is recognised, albeit the site does not represent the preferred direction of growth at the town at this stage.

In arriving at the current preferred site at Aylsham we do, however, consider that officers failed to acknowledge the wide range of environmental and social benefits offered by our client's land. We also consider that the availability and deliverability of the site – in single ownership and under the control of an active housebuilder – has not been afforded sufficient weight in light of the NPPF's emphasis on delivery. This is particularly pertinent in light of the multiple ownership of the current draft allocation at Burgh Road.

Regardless, we have now undertaken a thorough review of the proposals at the site in response to both the conclusions of the HELAA and the comments made by officers at the recent meeting. This review now allows us to demonstrate that the main outstanding site constraints identified in the HELAA, along with the specific concerns of NCC Highways, can clearly be overcome.

A further matter discussed with officers at the meeting on 5th March 2020 was the potential phased delivery of the site resulting in the southern portion of the land being offered as an alternative smaller allocation at this stage. This suggestion was received positively and with enthusiasm by representatives of the GNLP team and NCC alike. To this end we are pleased to provide details of two separate schemes for the site as part of this submission – the first for the whole site, led by a phased residential element of 300 dwellings, with the second scheme comprising a scaled down development centred around approximately 150 dwellings (essentially the first phase of the larger scheme).

On this basis and bearing in mind the wide range of community and environmental benefits offered by the site, we are clear that our client's land – either as a location for 150 or 300 dwellings – should be included as an allocation in the GNLP, either as the principle allocation at the town or as an additional allocation in the event that officers concur with our conclusions on the requirement for a greater level of growth at Aylsham. To reiterate, it is our view that there is clear justification for the allocation of more than one site at the town in light of the pressing need for new homes across Greater Norwich and at Aylsham in particular.

Response to the HELAA and Officer Comments

The starting point of the review of our client's site was an acknowledgement of the 'amber' constraints identified by the HELAA review along with the summary of the merits of the site provided as part of the Site Assessment background papers. The HELAA comparison table, comprising Stage 2 of the site assessment process, identifies nine 'amber' constraints relating to the site – these are defined as constraints that may be mitigated. These specifically relate to the following:

- Site access;
- Utilities capacity;
- Utilities infrastructure;
- Flood risk;
- Sensitive townscapes;
- Biodiversity and geodiversity;

- Historic environment;
- Transport and roads; and
- Compatibility with neighbouring uses.

Otherwise the site returned a 'green' rating in respect of all other sustainability indicators. No major 'red' rated constraints were identified.

On the basis that the site assessment process identified no critical constraints that could not be mitigated it was identified as a 'Reasonable Alternative Site' at the town. In providing the following commentary the summary table included as the conclusion of the site assessment paper sheds further light on why some of the site-specific issues were flagged as 'amber':

"This site is considered to be a reasonable alternative if additional growth is needed in the towns, subject to a satisfactory access strategy via existing allocation AYL2⁶. A new school site is needed in Aylsham which is promoted as part of this scheme, however more evidence is needed regarding delivery. The potential to deliver a school on this site needs to be balanced against the fact that there are considered to be other more preferable sites for allocation in the town on highways grounds. This site is therefore a secondary preference for allocation at the town. The site does have some constraints including a large area in flood zones 2 and 3, impact on the Bure Valley and heritage issues."

Taking stock of these conclusions, representatives of Westmere Homes Ltd met with GNLP and NCC officers on 5th March 2020 to discuss the reasons behind the identification of the site as a 'Reasonable Alternative' rather than the preferred allocation at the town. From these discussions we understand that, in selecting the preferred site at Aylsham, there was little to separate the current proposed allocation and our client's land in respect of performance against the sustainability matrix included in the HELAA.

Officers confirmed that ultimately the decision was made based on access to the highway network as the overriding factor. On this issue NCC confirmed that the main concern in respect of the scheme submitted to officers in March 2018 was the proposed creation of a new access onto the A140, a road that forms part of the local strategic highways network. Consistent with the conclusions of the site assessment process, set out above, it was recommended that NCC's strong preference would be the provision of the principle vehicular access to the site from the Bure Meadows development to the south. If a satisfactory scheme of access on this basis could be demonstrated it was conceded by officers that the merits of the site, and whether it should form the preferred location for growth at the town, would need to be subject of a further review.

We are now pleased to provide the following updates in respect of our client's proposals which confirm that all of the identified constraints can now be satisfactorily overcome and that resultantly there is an overriding case for the site to comprise the principle allocation at Aylsham.

Site Access / Transport and Roads

Drawing on both the discussions with NCC at the recent meeting, allied with the conclusions of the Site Assessment paper, the single main highways issue that was identified following the review of the previous proposals for our client's site was the intention to construct a new access onto the A140.

With this in mind, our client appointed Vectos to reconsider the access strategy for the site, and where necessary to update the supporting evidence contained within the 'Transport Feasibility Appraisal' that was submitted alongside the previous representations. The outcome of Vectos' review, which is provided at **Enclosure A1**, is

⁶ The Bure Meadows development to the immediate south of the site

that it would be appropriate to serve this site using the existing highway network associated with the Bure Meadows site. Through reference to current best practice guidance, Vectos demonstrates that the revised access strategy shown on the updated masterplan:

- Ensures there are a range of routes and potential emergency access options that would ensure emergency vehicles would be able to access the site in an emergency;
- Incorporates measures that will provide future residents with a choice of transport modes; and,
- Would not give rise to any unacceptable highway capacity constraints within the Bure Meadows site and/or on the wider highway network.

On the basis of the amended access strategy it is evident that the main constraint that counted against the site when determining the preferred allocation at the town has now been overcome. It is therefore our view that there is a strong justification and legitimate transport sustainability reasons why our client's land at North East Aylsham should be included as the principal allocation at the town.

Utilities and Infrastructure

It is not considered that either the capacity of existing utilities or access to local utilities infrastructure presents any form of constraint on the delivery of our client's land.

First and foremost, the single main infrastructure constraint that has hindered the delivery of development at Aylsham up to this point – the capacity of the local wastewater treatment works – is in the process of being resolved. Indeed, the draft strategy document confirms that Anglian Water is in the process of upgrading the plant at Aylsham as part of the company's £384m capital investment programme.

Otherwise, in terms of access to other utilities the Infrastructure Strategy provided as part of the package of information towards the Call for Sites confirms that both Anglian Water and UKPN have existing apparatus that crosses the site. Other utility providers have existing apparatus beneath carriageway and footways of the highways that bound the site including the northern end of Elizabeth Way to the immediate south which is proposed to form the new principle vehicular access.

Flood Risk

It is acknowledged that the majority of the northern extent of the site falls within the Environment Agency's Flood Zones 2 and 3. However this portion of the site will entirely comprise the proposed Country Park along the corridor of the River Bure as well as additional landscaping and amenity space at the north eastern corner of the proposed developable parcel to the south of the river. Indeed, the site is of a scale to ensure that a substantial residential-led mixed-use development can still be delivered which entirely avoids any built form in areas prone to flooding.

Sensitive Townscapes

It is not entirely clear why either of these matters have been identified as constraints specific to our client's land by the HELAA. The development of the land would essentially serve as a northern extension to the recently developed Bure Meadows scheme and would very much be observed in this context. In addition, the site is some distance from any significant heritage assets removing the potential for the site to have any adverse impact on their importance or setting.

Regardless, a significant amount of work has been undertaken in reaching the design of the current proposals for the site informed by a Landscape and Visual Assessment prepared by Aspect Landscape Planning (**Enclosure A2**). It is intended that the eventual development would incorporate a number of character zones featuring low,

moderate and higher density development to allow for a transition in the built form across the site. It would also seek to provide a significant level of open space at the northern end of the site comprising the Country Park that will include a new publicly accessible landscaped link between the town and the open countryside beyond.

Regardless, we would anticipate that any future site-specific policy would include the need for agreed design codes in line with both general best practice in design and the policies of the now adopted Aylsham Neighbourhood Plan.

Historic Environment

In addition, this submission is supported by a Heritage Assessment relating to the site prepared by Asset Heritage (**Enclosure A3**). The Appraisal also considered the potential impact of the two alternative sites at the town at Burgh Road and Norwich Road to identify whether the conclusions of the HELAA assessment should alter.

In respect of the impact any development of our client's land may have on heritage assets specifically the Assessment concludes that the development of the site would not give rise to any adverse impacts on heritage assets. Although the HELAA gave the site an 'amber' rating under the Townscapes and Historic Environment categories (indicating the possibility of a detrimental impact that could be mitigated) it is recognised that this assessment would likely have comprised a desk-based exercise only concluding on this matter principally on the grounds of the distance of the site from the conservation area and the nearest listed buildings.

The site-based work has been able to conclude that there is no meaningful inter-visibility or otherwise significant relationship between the site and the heritage assets identified and therefore that the historic built environment offers no heritage constraints to the site's development as proposed.

Conversely, the conclusions of the Heritage Appraisal have identified that the development of both the preferred site at the town (land at Burgh Road, GNLP595) and the other reasonable alternative (land at Norwich Road, GNLP0596) would in fact give rise to minor adverse harm on heritage assets. This would result in the Burgh Road site retaining its 'amber' rating with the Norwich Road site attracting an 'amber' rating as opposed to its current 'green' rating in respect of impact on townscape. In addition, both would attract an 'amber' rating for impact on the historic environment.

Biodiversity and Geodiversity

It is understood that biodiversity has been identified as a potential constraint due to the proximity of the site to the River Bure. However, it is clear that the site's relationship with the river provides not only a constraint but also a significant opportunity to deliver biodiversity gain. This would be achieved through the creation of new habitats and the protection and stewardship of those that currently exist both at the river and also around the fringes of the site.

Indeed, paragraph 313 of the GNLP Draft Strategy confirms that "*The Bure Valley and Marriott's Way form the core of a well-developed local and strategic green infrastructure network and development could support further improvements.*" To this end the suite of plans supporting this submission, prepared by Aspect Landscape Planning (**Enclosure A4**), show the way in which significant biodiversity enhancements can be secured at both the new Country Park and across the developable area of the site. These drawings detail the following habitat enhancements:

- The retention and enhancement of the existing ditch network at the north east of the site. This semi-wetland will be enhanced by the planting of additional trees and hedgerows as well as wildflower meadows and tussocky grassland;

- Similar planting will also be introduced throughout the Country Park and along the northern boundary of the developable area of the site. This planting will be supplemented with more impenetrable planting (e.g. blackthorn) to create some 'low-disturbance' areas parallel to the riverbanks to deter both pedestrian and dog entry;
- The planting scheme will also include native trees suited to wet conditions along the banks of the river set at intervals to avoid total overshadowing of the banks to ensure a mix of aquatic habitats can be created. This planting would include natural waterside species such as willow;
- Planting throughout the development itself would include species-rich native hedgerows to create 'green corridors' and provide wildlife connectivity across the site. Suitable species could include field maple, hazel, hawthorn, spindle, holly, blackthorn dog rose and dogwood. As part of this planting scheme existing treelines and hedgerows would be reinforced; and
- The drainage features around the periphery of the site would be used as the focal point for new semi-wetlands and seasonal aquatic habitats. The development of these basins as species-rich habitats would be encouraged through the introduction of additional native planting.

Compatibility with Neighbouring Uses

Similar to matters relating to townscape it is not clear why the HELAA considers the site's compatibility with neighbouring uses to represent a potential constraint. On the contrary the site is entirely compatible and indeed complementary to neighbouring uses – indeed it would represent an extension of the recently developed Bure Meadows scheme to the south. The scheme would form the following entirely positive linkages with the uses surrounding the site:

- Principally, the provision of a new school site on the land will help create an enlarged education hub at the town centred around Aylsham High School;
- The provision of enhanced footpath links across the site would also allow for heightened access from the residential development to the south towards the main source of employment at the town, the Dunkirk Industrial Estate;
- The delivery of a linear walk as part of the Country Park proposals will help provide a seamless linkage between the town to the west and the open countryside to the east; and
- Lastly, the provision of a dedicated site for the 1st Aylsham Scout Group would place this facility at the very heart of the new community developing on the eastern side of the town.

Conclusions on Constraints

Based on our analysis above there is a clear need for officers to undertake a further assessment of its merits against the 14 categories set out in the Stage 2 HELAA Comparison Table. It is now clear that there are no grounds to conclude an 'amber' rating in respect of any of the site's attributes. To this end the updated table is presented as follows (our client's site, reference GNLP0336, in bold):

Site Reference	Categories													
	Site Access	Access to services	Utilities capacity	Utilities infrastructure	Contamination / ground stability	Flood risk	Market attractiveness	Significant landscapes	Sensitive townscapes	Biodiversity and geodiversity	Historic environment	Open space and GI	Transport and roads	Compatibility with neighbouring uses
	Aylsham													
GNLP0287	Amber	Amber	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
GNLP0311	Amber	Green	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Green
GNLP0336	Green*	Green	Green*	Green*	Green	Green*	Green	Green	Green*	Green*	Green*	Green	Green*	Green*
GNLP0595	Amber	Amber	Amber	Amber	Green	Green	Green	Green	Amber	Green	Green	Green	Amber	Amber
GNLP0596	Green	Amber	Amber	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber
GNLP2059	Amber	Amber	Amber	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Red	Green
GNLP2060	Amber	Amber	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Amber

*Formerly amber

Site Proposals

Following the comprehensive further review of the site and its constraints we are pleased to confirm that our client's land is immediately available for the delivery of **either** of the following options (illustrated by **Enclosure A4**):

Option 1:

- A residential development of up to 300 dwellings, including a range of house types and tenure, including an appropriate proportion of affordable housing in line with emerging GNLP policy;
- The potential delivery of the site in two phases of up to 150 dwellings with all of the community and environmental improvements listed below to be provided as part of or alongside the first phase of development;
- Land appropriate for the delivery of a new primary school to serve the east of the town comprising two forms of entry (approximately 2.1ha). The location of this land adjacent to the Aylsham High School would allow for the creation of vibrant education hub;
- Land to serve the needs of the 1st Aylsham Scout Group, labelled as a 'community zone' (approximately 0.5ha). Inclusion of this land follows specific discussions with the Scouts group, the support of whom was confirmed by way of a letter dated 12th March 2018. A copy of this letter has previously been provided to Officers;
- If required, additional allotment land to meet the pressing need for plots at the town;
- A linear country park comprising a wildlife and recreation area along the banks of the River Bure on the northern edge of the site including a protected wildlife habitat on the site's northernmost parcel. This would be complemented by an appropriate level of additional public open space throughout the site;
- Immediately available highways access drawn from the Bure Meadows scheme to the south of the site. The main point of access would be supplemented by an additional emergency access located at either the south east or south west corners of the site;
- Enhanced connections with the local footpath networks allowing for improved pedestrian access to both the town centre and the Dunkirk Industrial Estate to the north; and
- A scheme of flooding and surface water drainage attenuation along the northern and eastern fringes of the site which would provide the additional benefits of increased landscaping around the site's fringes and an extension of the wildlife zone in the north allowing for a net gain in biodiversity.

An extract from the Option 1 illustrative masterplan is included overleaf.



Option 1 Illustrative Masterplan (up to 300 dwellings deliverable over two phases if required)

Option 2:

- A residential development of up to 150 dwellings, including a range of house types and tenure, including an appropriate proportion of affordable housing in line with emerging GNL policy;
- Immediately available highways access drawn from the Bure Meadows scheme to the south of the site; and
- All of the community and environmental benefits proposed as part of the Option 1 scheme.

An extract from the Option 2 illustrative masterplan is included overleaf.



Option 2 Illustrative Masterplan (150 dwellings deliverable as a single phase)

We can confirm that our client is satisfied that both the Option 1 and Option 2 proposals would be able to viably secure all of the community benefits proposed whilst still providing a policy compliant mix of dwellings in respect of size and tenure. It is, however, our firm recommendation that the Option 1 scheme is included in the GNLP as a preference due to the fact that the site represents the most appropriate and deliverable development opportunity at Aylsham. The unique merits of the scheme are summarised below.

Benefits of Land at North East Aylsham

As discussed at the officer meeting on 5th March 2020 it is our view that the allocation of our client's land – either by way of Option 1 or 2 – would deliver substantial benefits at the town that cannot be achieved by either the current preferred allocation or the second of the reasonable alternatives identified in the Site Assessment paper. These are considered to be as follows:

- **The provision of the most suitable site at the town for a new primary school that would both complement and share the facilities currently available at Aylsham High School.** The delivery of the new school at the south western corner of our client's land would allow for the creation of a new education hub at the town and would present immediate benefits to parents and pupils accessing the site including the

ability to utilise existing bus services and drop-off facilities serving the high school. Similarly, it would present an opportunity for both schools to share existing sports and recreation facilities as well as the new 3G pitch that is due to be delivered during 2020/21 following allocation of £475,000 of CIL money following Broadland's February 2020 Cabinet meeting.

In respect of the school it is noted that the Site Assessment paper identifies it as a clear benefit of the site although concludes that "*more evidence is needed regarding delivery*". We can confirm that it is our client's intention to provide the school site as a fully serviced plot capable of accommodating the delivery of a new school at any point during the course of the development of the site. Beyond this we are not entirely clear what evidence may be required to confirm the deliverability of the school – our client would of course be more than happy to provide any specific supplementary evidence requested by officers.

- **Sufficient land to deliver additional community benefits including a new site for the 1st Aylsham Scout Group.** A central pillar of our client's proposals for the site has always been its ability to deliver a range of community facilities that meet the specific needs of the town. Following a meeting with Aylsham Town Council on 13th February 2018 it was made clear that two of the principal community requirements at the town were land for the relocation of the local scout group as well as additional allotment plots. On this basis we have now liaised with the leader of the scout group and confirmed that in the event that our client's land is allocated provision will be made for the hall to be relocated. Similarly, the site is capable of accommodating additional allotments in the event that a demand for plots still exists at the point of delivery;
- **The provision of a country park to serve the town.** Unique to our client's site is its ability to provide a substantial Country Park on the eastern edge of the town which would result in the delivery of a significant level of Green Infrastructure as part of both the Option 1 and 2 proposals. It would also positively seize upon the opportunities identified at paragraph 313 of the Draft Strategy suggesting that new development may facilitate improvements to both the Bure Valley and Marriott's Way public access schemes. Central to our client's proposals in respect of the Country Park would be the improvement of habitats throughout along with the provision of nature trails and opportunities for outdoor education to further complement the school site.
- **The enhancement of the historic environment.** A minor positive impact can be anticipated through the opening up of the riverside land in the northern part of the site to public access. This will present the opportunity to better reveal the connection of the river and the Aylsham Navigation (a non-designated heritage asset) to the town and conservation area, and particularly to the Grade II listed former watermill and other listed buildings and historic infrastructure that stand to the west on Mill Row.
- **Flexibility of delivery.** As confirmed at the recent meeting with officers our client is pleased to offer their land at North East Aylsham on the basis of either a 150 or 300 dwelling scheme – both would be able to viably provide the wider benefits described throughout this submission. It is, of course, our strong assertion that the site should be considered to represent the principal allocation at the town and that the 300-dwelling scheme should be secured by officers as a priority. The site also offers the unique benefit of being able to be delivered in phases through the plan period whilst guaranteeing the viable provision of all of the proposed community benefits upon the delivery of the first 150 dwellings.
- **Certainty of delivery.** Importantly we are pleased to confirm that the entirety of the land is in single ownership and under the control of our client, Westmere Homes, an active housebuilder operating across East Anglia. This contrasts with the current preferred allocation at the town which we understand is currently in the ownership of three separate parties and is yet to benefit from any formal commitment and agreement between them. Additionally, our client's land already benefits from a ready-made point of vehicular access to the wider highways network comprising the northern terminus of the spine road serving the Bure Meadows development to the south.

Conclusions

On the basis of the above we are pleased to conclude that our clients' land at North East Aylsham can be made immediately available for the delivery of a residential development of between 150 and 300 dwellings (depending on whether Option 1 or 2 is pursued) including land for a new primary school, complementary community uses, enhanced footpath links and a substantial new linear Country Park at the town along the corridor of the River Bure. In respect of the definition of deliverable set out in the glossary of the NPPF we can confirm that the site is:

- **Available now:** This submission confirms that the site is being promoted by an active regional housebuilder, Westmere Homes. The land is free of any legal covenants, agricultural tenants or any other constraints to its immediate delivery;
- **Suitable for development now:** The comprehensive review of the site and its constraints set out above, allied with the previous suite of representations submitted towards the GNLP, demonstrates that it is devoid of any policy, environmental or physical constraints that would preclude it from delivery. Indeed, the suitability of the site has already been acknowledged by officers through its identification as a 'Reasonable Alternative' at the town. We would, in fact, contend that it represents the single most suitable site for a residential development of scale at Aylsham, particularly bearing in mind the wide range of community and sustainability benefits its delivery would secure.
- **Achievable:** As confirmed above the proposals detailed as part of this submission are entirely viable and likely to be implemented within the earliest years of the plan period due to the involvement of an active regional housebuilder. If required the site can be delivered flexibly, either as a single phase 150-unit scheme, a single phase 300-unit scheme or a 300 units scheme comprising two distinct phases. It is considered that the flexibility of delivery offered by our client's site is unique amongst the potential strategic sites being promoted at the town.

Annex 2: Land at Harvest Close, Hainford (Site Reference GNLP)

Background

Our review of the land at Harvest Close, Hainford, which is jointly promoted on behalf of Westmere Homes Ltd and Saltcarr Farms Ltd, focuses principally on the conclusions included in the Site Assessment paper.

As it stands Hainford and Stratton Strawless represents one of 10 'Village Clusters' not to thus far be allocated any growth as part of the Draft Strategy. This is due to the Site Assessment paper concluding that every site at the village is in some way burdened by an overriding constraint that would preclude them from allocation. These conclusions are reached despite the profile for Hainford included as part of the evidence base identifying that village can capably accommodate up to 60 dwellings based largely on the capacity that exists on the role of the local primary school.

Upon discussing this issue with officers at the meeting on 5th March 2020 it was confirmed that the strategy at the outset of the plan's development was to identify sites to deliver up to 60 dwellings at each of the 25 Village Clusters. Where any cluster is not currently allocated any growth, this is likely because officers were unable to identify any appropriate unconstrained sites and does not reflect the overall sustainability of the village more generally.

In respect of Hainford, officers were clear that each site promoted at the village suffered one or more critical constraints that would preclude their allocation. Common amongst these issues was the poor connectivity between the village and the school, an issue that currently impacts on our clients' land.

Response to the HELAA and Officer Comments

Putting key constraints to one side, the HELAA comparison table included at Stage 2 of the Site Assessment paper concludes that our clients' site already comfortably represents the most sustainable site at the village attracting only three 'amber' ratings across the 14 criteria. These relate to site access, townscape and transport and roads. Otherwise, the other sites are all burdened by a number of constraints with at least seven 'amber' ratings each. In the event that it can be demonstrated that growth at Hainford can be achieved on a sustainable basis our clients' land would therefore inevitably represent the preferred site.

However, despite the favourable HELAA rating the summary presented Stage 7 of the Site Assessment paper concludes that the site *"is not considered reasonable for allocation as there is no safe pedestrian route to Hainford Primary School and due to the distance it would not be feasible or viable to provide a footway"*. On review of the wider Stage 7 conclusions it is acknowledged that this is a common constraint in respect of all sites at the village with six further sites precluded from allocation on an identical basis.

Site Access

Based on the HELAA ratings and the conclusions of the Site Assessment paper we have sought to investigate how the principal requirement of safe pedestrian access to the school can be achieved. This matter was discussed at length with officers at the recent meeting, discussions that have now informed the proposed approach to the delivery of the site.

We are now pleased to formally confirm the proposals tabled at the meeting. Since the publication of the Draft Strategy and the accompanying evidence base our clients have moved to secure control of the land immediately to the north of their site. As a result, it is now possible to provide a safe continuous segregated footway from Harvest Close to the primary school. This will be via a new 1.5m wide footpath leading from the south west corner of the site to Newton Road. At this point a further footway will be provided along the highway verge leading all the way to Hainford Primary School and connecting into the existing footpath to the north. A detailed design demonstrating how this can be achieved is included as part of the accompanying Access Strategy, prepared by

Vectos (**Enclosure H1**). The provision of this link, which would represent a significant betterment to both the footpath and highway environment at Hainford, can only be delivered through the allocation of our clients' site.

In terms of vehicular access, the preferred entrance to the site will be from Harvest Close (officers will recall that an alternative access onto Dumbs Lane was proposed as part of the previous submission). The Access Strategy does, however, demonstrate that as an alternative the proposed footpath to the north of the site could be successfully upgraded to provide either a primary or secondary access to the site.

Sensitive Townscapes

It is not clear why the HELAA currently attributes an 'amber' rating to the site under this criterion. Regardless, it is clear that the development of the site could be delivered in a way that creates a sensitive new edge to the village when viewed from the north and essentially would complement the most recent development at the village, the homes at Harvest Close.

Due to the size of the site it would be possible to deliver a development of a low-medium density of approximately 20dph that would also be able to accommodate a generous landscape buffer along its northern edge. These measures combined would successfully mitigate any adverse visual impact of the proposal when viewed from the north. The landscape approach proposed at the site is indicated by the enclosed Development Framework Plan prepared by Aspect Landscape Planning (**Enclosure H2**).

Conclusions on Constraints

Based on our analysis above there is a clear need for officers to undertake a further assessment of its merits against the 14 categories set out in the Stage 2 HELAA Comparison Table. It is now clear that there are no grounds to conclude an 'amber' rating in respect of any of our client's site's attributes. Due to the fact that all of the other sites were, however, precluded from allocation due to a single overriding constraint in all instances (connectivity to the school the most frequently cited) it would be logically to identify these as 'red' rated criteria.

To this end the updated table is presented as follows (our client's site, reference GNLP2162, in bold):

Site Reference	Categories													
	Site Access	Access to services	Utilities capacity	Utilities infrastructure	Contamination / ground stability	Flood risk	Market attractiveness	Significant landscapes	Sensitive townscapes	Biodiversity and geodiversity	Historic environment	Open space and GI	Transport and roads	Compatibility with neighbouring uses
	Hainford													
GNLP0065	Amber	Red*	Amber	Green	Green	Amber	Amber	Green	Amber	Amber	Green	Green	Amber	Green
GNLP0069	Amber	Amber	Amber	Green	Green	Amber	Amber	Green	Red*	Amber	Green	Green	Amber	Green
GNLP0181	Amber	Red*	Amber	Green	Green	Amber	Amber	Green	Amber	Amber	Green	Green	Amber	Amber
GNLP0190	Amber	Red*	Amber	Green	Green	Green	Amber	Green	Amber	Amber	Green	Green	Amber	Amber
GNLP0393	Amber	Amber	Amber	Green	Green	Red*	Amber	Green	Amber	Amber	Green	Amber	Amber	Green
GNLP0512	Amber	Red*	Amber	Green	Green	Amber	Amber	Green	Amber	Amber	Green	Green	Amber	Green
GNLP0582	Amber	Red*	Amber	Green	Green	Amber	Amber	Green	Amber	Amber	Green	Green	Amber	Green
GNLP2035	Amber	Red*	Green	Green	Amber	Amber	Green	Green	Amber	Amber	Green	Green	Amber	Green
GNLP2162	Green*	Green	Green	Green	Green	Green	Green	Green	Green*	Green	Green	Green	Green*	Green

*Formerly amber

Site Proposals

Following a review of the access arrangements at the site we are now pleased to confirm the following proposed development:

- A residential development of up to 60 dwellings, including a range of house types and tenure, including an appropriate proportion of affordable housing in line with emerging GNLP policy;
- On-site public open space including a new children's Local Area of Play (LAP) and a landscape buffer along the northern fringe;
- Vehicular access from Harvest Close; and
- A new 1.5m-wide footpath link leading from the site and then along Newton Road to Hainford Primary School.



Illustrative Masterplan

Our clients are pleased to confirm that the delivery of the proposed footpath link is entirely viable as part of the comprehensive redevelopment of the site, described above.

Benefits of Land at Harvest Close

In light of the difficulties faced by officers to date in identifying sufficient development land at Hainford, it is considered that the allocation of our client's land at Harvest Close, as the only deliverable and suitable site at the village, would offer two clear and significant benefits:

- **The provision of a vital safe footpath connection between the village and Hainford Primary School.** It is clear from both the conclusions of the Site Assessment paper as well as discussion with officers that the lack of safe pedestrian access from Hainford to the local primary school presents an overriding constraint to the growth of the village. In addition, the lack of a footway along Newton Road represents a clear highway safety hazard. To this end it is entirely apparent that the betterment to the local footpath network that would be secured as part of our client's proposals would significantly enhance the sustainability of the village. To reiterate, these vital footpath improvements can only be secured through the delivery of our clients' site.
- **The delivery of much needed new homes at Hainford.** Due to the unique ability of our client's site to secure safe pedestrian access to the primary school it represents the only site capable of accommodating sustainable growth at Hainford. On this basis the potential to allocate the site represents a rare opportunity to secure a mix of new homes serving the Village Cluster – this would include the provision of a policy compliant level of affordable housing as well as a supply of much needed smaller dwelling and bungalows.

Conclusions

On the basis of the above we are pleased to conclude that our clients' land at Harvest Close, Hainford, can be made immediately available for the delivery of a residential development of up to 60 dwellings including new pedestrian links from the site to the primary school. In respect of the definition of deliverable set out in the glossary of the NPPF we can confirm that the site is:

- **Available now:** This submission confirms that the site is being jointly promoted by both the landowner and an active regional housebuilder. The land is free of any legal covenants, agricultural tenants or any other constraints to its immediate delivery;
- **Suitable for development now:** The comprehensive review of the site and its constraints set out above, allied with the previous suite of representations submitted towards the GNLP, demonstrates that it is devoid of any policy, environmental or physical constraints that would preclude it from delivery. Indeed, due to its unique ability to overcome critical highway and pedestrian issues at the village the site represents the only suitable opportunity for development within the Hainford / Stratton Strawless Village Cluster; and
- **Achievable:** As confirmed above the proposals detailed as part of this submission are entirely viable and likely to be implemented within the earliest years of the plan period due to the involvement of an active regional housebuilder.