

# Greater Norwich Local Plan

## Regulation 18 Draft Plan Consultation

### Response Form

Thank you for responding to the Regulation 18 Draft Plan Consultation on the emerging Greater Norwich Local Plan.

The current consultation runs from. **29<sup>th</sup> January to 16<sup>th</sup> March 2020.**

It covers the **Strategy and Site Allocations**. We need to get views on these documents to help us draw up the version of the plan which will be submitted to the Planning Inspectorate.

When commenting on a policy or site, please include the site reference(s) in your comments.

If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

It is easier to respond online at [www.gnlp.org.uk](http://www.gnlp.org.uk) . If you cannot do this, please use this form to respond to the consultation on new, revised and small sites.

Consultation documents are available from [www.gnlp.org.uk](http://www.gnlp.org.uk). There are also supporting documents which provide information on our policies and sites which may help you to make your comments.

Hard copies of the documents are available at consultation "Deposit Points" at:

- County Hall, Martineau Lane, Norwich (main reception);
- City Hall, St Peters Street, Norwich (2<sup>nd</sup> floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

## **Submitting your Response Form**

Responses should be submitted by email to [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk) or completed hard copy forms should be sent to:

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

**All submissions should be made no later than 5pm on  
Monday 16<sup>th</sup> March 2020.**



Organisation (where relevant)	Hugh Crane Ltd
Address	C/O Savills (UK) Ltd Lawrence House 5 St Andrews Hill Norwich
Post Code	NR2 1AD
Telephone Number	
Email Address	<a href="#">_____</a>

**Please make your comments below. You can comment on more than one policy or site on this form. Please clearly state the reference number of the policy or site your comments refer to.**

<b>Policy or site reference</b>	<b>Comments</b>
<p><b>Draft Greater Norwich Local Plan – Part 1 – The Strategy</b></p> <p>Introduction</p> <p>Chapter 5: The Strategy</p> <p>Policy 1 The Growth Strategy</p> <p>Policy 2 Sustainable Communities</p> <p>Policy 5 Homes</p> <p>Chapter 7 - Strategy for the areas of growth</p> <p><b>Draft Greater Norwich Local Plan – Part 2 – Site Allocations</b></p> <p>Site Policy GNLP1048 - Land to the east of Woodbastwick Road, Blofield Heath</p>	<p>Savills (UK) Ltd is instructed by Hugh Crane Ltd to make representations in response to the current Greater Norwich Local Plan consultation.</p> <p>In 2016 the site 'Land to the East of Woodbastwick Road, Blofield Heath' was submitted for consideration for residential allocation as part of the Call for Sites. As part of the current consultation, Broadland District Council has identified part of this site for residential allocation. Strong support is given draft Policy GNLP 1048 which accepts the principle of residential development in this location but it is considered that the allocation should plan for additional housing at the site. Detailed comments are made later in this response.</p> <p>Additional technical information has now been prepared is appended to this submission to support the draft allocation at the site (Policy GNLP 1048). Once you have had time to consider these representations, we would welcome the opportunity to meet with you to discuss the site further, especially the contribution that it can make to the early and continued delivery of much-needed housing (including affordable housing) on a site that has no over-riding constraints.</p> <p>We would also welcome the opportunity for continued engagement to share supporting technical information for the site.</p> <p>These representations are structured in such a way that they respond to relevant sections of the Local Plan Consultation.</p>

## **Draft Greater Norwich Local Plan – Part 1 – The Strategy**

### **Question 1 - Please comment on or highlight any inaccuracies within the introduction**

#### The need for a new Local Plan

Support is given to the preparation of a new Greater Norwich Local Plan.

Planning law and the National Planning Policy Framework requires Local Plans to be reviewed every 5 years and updated as necessary. The adopted Joint Core Strategy for Broadland, Norwich and South Norfolk was originally adopted in 2011 and amendments adopted in January 2014; it relates to the plan period 2008 to 2026.

The Planning Practice Guidance states: "...*The National Planning Policy Framework requires strategic policies to look ahead over a minimum 15 year period from adoption, although authorities are required to keep their policies under review...*" (Paragraph: 012 Reference ID: 2a-012-20190220).

The emerging Local Plan seeks to plan for the period 2018 to 2038.

#### Purpose of the emerging Local Plan

The National Planning Policy Framework (NPPF) identifies at paragraph 20 that "*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for: a) housing (including affordable housing...*" Paragraph 23 of the NPPF also requires strategic local plan policies to allocate sufficient sites to deliver the strategic priorities of the area.

It is noted that it was the intension of the Greater Norwich Authorities to work together to produce a single plan as stated within the Section 1 of the Part 1 Strategy Document. However it is stated at paragraph 26 that South Norfolk will prepare a separate village clusters plan. This approach is a direct contradiction to the single plan approach and creates an element of uncertainty regarding the deliverability of some 1,200 homes across the Greater Norwich area.

In respect of how the GNLP will relate to other adopted 'local plan documents' it is explained at para. 18 that "*When adopted, the GNLP will supersede the current JCS [Joint Core Strategy] and the Site Allocations documents in each of the three districts. The great majority of the undeveloped sites in the Site Allocations plans are re-allocated through the GNLP.*"

It would appear that the approach taken within the draft GNLP does not allocate sufficient sites, and defers the allocation of a number of sites to another plan. In this regard, the draft GNLP conflicts with national policy.

#### Timescales

The current Local Development Scheme for Broadland District (July 2019) suggests that the new Local Plan could be adopted in Autumn 2021; however it is acknowledged by the Greater Norwich Authorities that the timescales have slipped and the emerging Local Plan may only be adopted in Autumn 2022.

In light of the Council's anticipated timescales, the emerging Greater Norwich Local Plan, it is considered that policies could have 16 year longevity, exceeding the minimum requirement for a 15 year longevity is supported. The additional flexibility allows for potential delays at Examination stage.

Concern is raised that no formal timescales have been published in respect of the South Norfolk Village Clusters Plan.

#### Summary

#### **Representation to Question 1: Object / Comment:**

**The draft GNLP therefore does not do what it says it does – it is not a single plan for the Greater Norwich area, prepared jointly by the three Districts.**

**Without sight of the 'South Norfolk Village Clusters Housing Site Allocations' document:**

- **it is impossible to know whether sufficient sites will be found for the 1,200 new homes assigned to that area / document; and**
- **there is no evidence to demonstrate that overall pattern of development will be an appropriate and sustainable strategy, taking into account the reasonable alternatives, based on proportionate evidence.**

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

The proposed growth strategy is set out a paragraph 163 of the draft Greater Norwich Local Plan this states:

*"a. Maximises brownfield development and regeneration opportunities, which are mainly in Norwich. The brownfield/greenfield split for new homes in the plan is 27%/73%;*

*b. Broadly follows the settlement hierarchy set out in policy 1 (the Norwich urban area; main towns; key service centres and village clusters) in terms of scales of growth as this reflects access to services and jobs;*

*c. Focusses most of the growth in locations with the best access to jobs, services and existing and planned infrastructure in and around the Norwich urban area and the Cambridge Norwich Tech corridor;*

*d. Focusses reasonable levels of growth in the main towns, key service centres and village clusters to support a vibrant rural economy. The approach to village clusters is innovative. It reflects the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages;*

- e. *Allocates strategic scale housing sites (1,000 dwellings +) in accessible locations;*
- f. *Allocates a significant number of medium scale and smaller scale sites in the urban area, towns and villages, providing a balanced range of site types to allow for choice, assist delivery and allow smaller scale developers and builders into the market. Overall, 12% of the homes allocated through the plan are on sites of no larger than 1 hectare, meeting national requirements;*
- g. *Sets a minimum allocation size of 12-15 dwellings to ensure that a readily deliverable amount of affordable housing is provided on all allocated sites."*

Support is given to the proposed continuation of the adopted spatial strategy in so far as it focusses development on the area around Norwich.

It is noted that the proposed Key Diagram identifies a 'Strategic Growth Area' as explained at paragraph 169. It is requested that additional consideration is given to the 'strategic growth area' identified. In addition the opportunity to include Blofield and Blofield Heath within the strategic growth area given that additional residential development at these settlements can support growth aspirations for Greater Norwich.

Within the adopted Joint Core Strategy explains "*Blofield is a large village with a reasonable range of facilities... Secondary education is provided at Thorpe St Andrew*"... "*Blofield Heath is a separate Service Village to the north with its own limited range of facilities*" (para 6.50). Subsequently to this a Neighbourhood Plan for the Blofield Parish area was made in July 2016 and relates to both Blofield and Blofield Heath. The Neighbourhood Plan provides updated information regarding the available services in the area.

In respect of the emerging Local Plan it is suggested that the Councils reconsiders the grouping of Blofield and Blofield Heath, particularly in the context of paragraph 78 of the NPPF which states "*... Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.*"

#### Summary

#### **Representation to Question 13: Object / Comment:**

**Support is given to the approach to focus development on the area around Norwich but additional consideration should be given to the inclusion of Blofield and Blofield Heath within the Strategic Growth Area to support growth aspirations for Greater Norwich.**

**Furthermore additional consideration should be given to the grouping of access to facilities at Blofield and Blofield Heath given the approach taken within the Neighbourhood Plan.**

**Consequently it is considered appropriate to allocate additional growth to Blofield Heath.**

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

We note the draft Greater Norwich Local Plan includes provision for the minimum housing requirement (calculated in accordance with the standard method for calculating Local Housing Need as set out in the NPPF and associated PPG) with a buffer of 9%. Support is given to the acknowledgement that housing numbers are in fact the minimum need for the Greater Norwich area.

It is explained at paragraph 60 of the NPPF that the housing requirement to be established within strategic policies: "... *should be informed by a local housing need assessment, conducted using the standard method ...*" In addition paragraph '68-001-20190722' of the PPG explains that the standard method: "... *provides a minimum number of homes to be planned for ...*" but the method: "... *addresses projected household growth and historic under-supply ...*" (ID: 2a-002-20190220) and again that it only "... *identifies a minimum annual housing need figure .... It does not produce a housing requirement figure.*" (Emphasis added).

Accordingly, additional consideration needs to be given to the housing requirement for the emerging Local Plan.

The PPG explains: "When might it be appropriate to plan for a higher housing need figure than the standard method indicates?"

*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. ... there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates."*

One such consideration is how residential development will support economic growth aspirations for Greater Norwich. It is explained elsewhere within the draft Greater Norwich Local Plan that the Councils are planning for 'enhanced jobs growth' and "aims to make the most of Greater Norwich's substantial growth potential to develop its leading role in the national economy" (para 145).

It is considered that allocation of additional housing at 'Land to the east of Woodbastwick Road, Blofield Heath' (Draft Policy GNLP1048) will assist the Local Planning Authorities in boosting the supply of housing within Greater Norwich. Discussed in detail below.

As previously stated in this response, concern is raised about the uncertainty regarding the proposed South Norfolk Village Cluster Housing Site Allocations and therefore inconsistency with paragraphs 20 and 23 of the NPPF.

#### Summary

#### **Representation to Question 14: Object / Comment:**

**For the reasons set out above, there appears to be a conflict within the draft Greater Norwich Local Plan in respect of the aspiration to make to most of economic growth potential however only planning for the minimum number of new homes throughout the plan period.**

**Allocation of additional housing at 'Land to the east of Woodbastwick Road, Blofield Heath' (Draft Policy GNLP1048) will assist the Local Planning Authorities in boosting the supply of housing within Greater Norwich.**

**Question 18. Do you support, object or wish to comments relating to the approach to sustainable communities including the requirement for a sustainability statement?**

**Question 19. Do you support, object or wish to comments relating to the specific requirements of the policy?**

Policy 2 – Sustainable Communities seeks to establish new requirements for energy efficiency for new built development across the emerging plan period. Having reviewed the supporting evidence base that the evidence does not support the draft policy requirement.

#### Summary

#### **Representation to Question 18 / 19: Object / Comment:**

**The requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not supported by the evidence that the policy relies upon.**

**There is no justification for the lack of any alternative approaches.**

**Consideration could be given to wording which 'encourages a 20% reduction against Part L of the 2013 Building Regulations'.**

**Question 27. Do you support, object or wish to comments relating to the approach to affordable homes?**

The draft Greater Norwich Local Plan Policy 5 proposes that:

"Major residential development proposals and purpose-built student accommodation will provide:

- at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28%, unless the site is allocated in this plan or a Neighbourhood Plan for a different percentage of affordable housing."

The supporting text (para. 240) explains that:

"The policy sets a general requirement for on-site affordable housing provision of 33% on sites that show better viability based on local evidence, with a lower requirement in Norwich City Centre. This is based on:

- The Strategic Housing Market Assessment 2017 which identifies a need for 11,030 affordable homes in Greater Norwich from 2015 to 2038, 28% of the total housing need identified at that point;
- Under national policy, small sites under 10 dwellings are not required to provide affordable housing. Larger sites will therefore have to ensure that overall affordable housing need is delivered;
- The most recent viability study findings which conclude that centrally located brownfield sites which have higher development costs which affect viability are generally able to provide 28% affordable housing;
- Some specific sites have very high costs associated with development. These are allocated with lower affordable housing requirements."

It is noted that the suggestion to plan for 28% affordable housing derives from the Strategic Housing Market Assessment (June 2017). In respect of determining recent planning applications, it is known that Broadland District Council has been seeking 28% affordable housing.

In the period since the SHMA was published, the Greater Norwich Authorities have amended the amount of housing to be planned for. It is necessary for the emerging policy to be supported by up to date evidence to ensure sufficient housing of the right type is planned for.

**Representation to Question 27: Object / Comment:**

**There is no evidence to justify the proposed 33% requirement as set out in the draft Policy. It is recommended that the Greater Norwich Authorities update the evidence base and update the policy to reflect the identified need.**

**To make the draft policy effective clarity needs to be provided regarding the reference to "at least' 33% housing.**

**Question 28. Do you support, object or wish to comments relating to the approach to space standards?**

We acknowledge the Councils' aspiration to plan for the Nationally Described Space Standards within the emerging Local Plan. However in order to do so it is necessary for the evidence base to meet the necessary tests for such a policy. Having reviewed the evidence base, additional justification is required. It is recommended that the Greater Norwich Authorities update the evidence base accordingly.

**Section 7 – Strategy for Areas of Growth**

**Policy 7.4 – The Village Clusters**

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

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

The strategy proposes for approximately 9% of new homes to come forward within the village clusters. At present growth at each of the village clusters is proposed to be based on primary school catchment areas.

Paragraph 78 of the NPPF states *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*

Broad support is given to the identification of an approach to facilitate development at village locations. However, objection is made to the indicative amount of growth proposed for each cluster as the approach is considered to be arbitrary; particularly where it is proposed that sustainable development sites will be unnecessarily limited.

Strong support is given to the identification of 'Land to the east of Woodbastwick Road, Blofield Heath' (Policy GNLP1048)

The introduction to the Site Assessment Methodology, states (para. 1.5):

*“The scale of growth proposed within each ‘village cluster’ reflects school capacity or ability or grow, plus the availability of other accessible services. Taking account of the timescales for delivery and other uncertainties, such as pupil preference, it has been assumed that a minimum scale of allocation (12- 20 dwellings) can be accommodated in all clusters if appropriate sites are available. To guide development all village clusters have been rated ‘red’ (12- 20 dwellings), ‘amber’ (20-50 dwellings) or ‘green’ (50-60 dwellings) based on information provided by*

*Children's Services, although this is a starting point and there is flexibility within these ratings, depending upon the quality of sites and the circumstances of individual schools."*

As a methodology, this statement is distinctly insufficient and places undue and unjustified emphasis on unpublished advice from 'Children's Services'. The Assessment Booklet for Blofield Heath states:

*"The current capacity of Hemblington Primary School is rated as green, the school is not landlocked and has spare capacity. The Blofield Heath and Hemblington cluster could therefore potentially accommodate development in the region of 50-60 dwellings dependent on the quality of the sites and the range of other services and facilities in the vicinity. However, after further consideration it has been decided that due to the high level of existing commitment in Blofield parish as a whole only approximately 12-20 new homes are appropriate for the Blofield Heath cluster."*

The assessment of figures for the Blofield Heath, and Hemblington Village Cluster was updated on 10<sup>th</sup> February 2020 within a 'Schedule of Corrections'. This document reiterates that Broadland District Council is treating Blofield (Key Service Centre' as a separate entity. Therefore the village cluster focuses on the needs of Blofield Heath and Hemblington.

The Council's figures identify:

- Site with planning permissions at sites at Blofield Heath and Hemblington amount to 35 dwellings.
- It is proposed that existing 2016 Site Allocation 'BLO5' for 36 dwellings will be rolled forward into the emerging Local Plan.
- New allocation identified for 15-20 dwellings (Policy GNLP1048 - Land to the east of Woodbastwick Road, Blofield Heath)

The proposed new allocation at Blofield Heath is proposed to be limited to accommodate only 15-20 dwellings despite supporting the Sustainability Appraisal assessing the capacity of the site to be much larger at 104 dwellings and the Assessment Booklet for Blofield Heath suggesting the site has a capacity of 70-80 dwellings at the same site. The approach taken within the draft Greater Norwich Local Plan appears to be at odds with the requirement in the NPPF for development plans to be 'positively prepared'.

Instead, it would appear far more representative of positive planning, and a justified and effective strategy, to recognise and reflect the local services available in the area, the recent growth of the area, and to provide for further growth to yet further support and improve the sustainability of the village in accordance with paragraph 78 of NPPF.

As previously stated in this response, the Greater Norwich Authorities should be planning to support economic growth aspirations for the area. In addition, concern has also been raised about the uncertainty regarding the proposed South Norfolk

Village Cluster Housing Site Allocations and therefore inconsistency with paragraphs 20 and 23 of the NPPF.

It is considered that additional housing should be allocated at 'Land to the east of Woodbastwick Road, Blofield Heath' (Policy GNLP1048). The precise amount of housing should be identified in discussion with the landowner.

### **Summary**

**Broad support is given to the identification of an approach to facilitate development at village locations. However, objection is made to the indicative amount of growth proposed for each cluster as the approach is considered to be arbitrary; particularly where it is proposed that sustainable development sites will be unnecessary limited.**

**Strong support is given to the identification of 'Land to the east of Woodbastwick Road, Blofield Heath' (Policy GNLP1048)**

**It is considered that additional housing should be allocated at 'Land to the east of Woodbastwick Road, Blofield Heath' (Policy GNLP1048). The precise amount of housing should be identified in discussion with the landowner.**

## **Draft Greater Norwich Local Plan – Part 2 – Site Allocations**

### **Policy GNLP1048 - Land to the east of Woodbastwick Road, Blofield Heath**

Hugh Crane Ltd fully supports the identification of 'Land to the East of Woodbastwick Road, Blofield Heath' for residential allocation within the emerging Greater Norwich Local Plan.

Strong support is given draft Policy GNLP 1048 which accepts the principle of residential development for 15-20 dwellings in this location but it is considered that the allocation should plan for additional housing at the site.

We would also welcome the opportunity for continued engagement to share supporting technical information for the site.

This submission is supported by a 'Highways Feasibility Assessment' prepared by Create Consulting Engineers.

### **Housing and Economic Land Availability Assessment**

The Housing and Economic Land Availability Assessment 2017 (HELAA) that has been carried out for the site was not based upon a specific amount of housing at the site.

In each of the HELAA volumes, sites are assessed against a range of criteria and scored 'red', 'amber' or 'green'. In each case, the site was scored based on the

information available to the GNDP at the time the assessment was carried out. As set out in the original December 2017 HELAA (para. 2.20):

*“The methodology states that if a site is assessed as red against any type of constraint or impact then it will be discounted and the site will not be considered suitable for development for the purposes of the HELAA assessment. Sites assessed as amber against any type of constraint or impact will be considered as potentially suitable providing that the constraint or impact could be overcome and the green category represents no constraint or impact.”*

The HELAA goes on to state (para. 7.5), as do the Addenda:

*“The HELAA presents a snapshot of the position at a particular point in time and will need to be updated regularly as plan preparation progresses.”*

The HELAA confirms that there are no constraints to the development of site GNLP 1048 and justifies the identification of the site for allocation within the emerging Greater Norwich Local Plan.

The site scored the following:

#### Constraints Analysis

- |                                      |       |
|--------------------------------------|-------|
| • Access                             | Amber |
| • Accessibility to Services          | Green |
| • Utilities Capacity                 | Amber |
| • Utilities Infrastructure           | Amber |
| • Contamination and Ground Stability | Green |
| • Flood Risk                         | Green |
| • Market Attractiveness              | Green |

#### IMPACTS ANALYSIS

- |  |       |
|--|-------|
| • Significant Landscapes               | Amber |
| • Townscapes                           | Green |
| • Biodiversity and Geodiversity        | Green |
| • Historic Environment                 | Green |
| • Open Space and GI                    | Green |
| • Transport and Roads                  | Green |
| • Compatibility with Neighbouring Uses | Green |

The HELAA site suitability conclusions state:

*“The site is a greenfield site off Woodbastwick Road and Orchard Close and well related to services. Initial highway evidence has highlighted concerns that there are potential access constraints on the site, but these could be overcome through development. Also, it is believed that, subject to suitable footpath provision, any potential impact on the functioning of local roads could be reasonably mitigated....”*

In response to be amber scoring for access, this submission is supported by a 'Highways Feasibility Assessment' prepared by Create Consulting Engineers. This demonstrates that safe vehicular access can be delivered at the site with new footway linkages between the site and the existing footway on the eastern side Woodbastwick Road.

The 'Highways Feasibility Assessment' also endorses the HELAA findings relating to the green score for 'Transport and Roads' category. The site is well related to existing bus stop along Woodbastwick Road. In addition it is demonstrated that the levels of additional traffic arising from a development of up to a possible quantum of 60 dwellings would generate a maximum of 41 two-way vehicle trips during the evening peak hours of activity and not give rise to any significant impact on the local highway network.

The HELAA site suitability conclusions continue: "...No concerns over potential impacts on heritage assets, flood risk, utilities, contamination, ground stability or ecology..."

In respect of the 'significant landscape' category the site has scored amber meaning that the impact could be overcome. By virtue of development at the site, it is acknowledged that there will be an impact upon the landscape. The Blofield Parish Neighbourhood Plan (2016) identifies 'Important Views and Vistas' at Policy ENV8 and Figure 16. The site is not situated within any of the identified important views and vistas. A planning application at the site would need to adequately mitigate the landscape impact. A supporting Landscape Impact Appraisal can be submitted to the Council for consideration.

#### Draft Policy Wording

*"POLICY GNLP1048 – Land east of Woodbastwick Road, Blofield Heath (approx. 0.95ha) is allocated for residential development. The site is likely to accommodate 15-20 homes, 33% of which will be affordable.*

*More homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints.*

*The development will be expected to address the following specific matters:*

- Access (vehicular and pedestrian) from Woodbastwick Road and adequate visibility will need to be demonstrated.*
- A 2.0m frontage footway will be required along with improvements to the existing footway at Mill Road and provision of a pedestrian crossing point at the Mill Road junction with Woodbastwick Road.*
- Design to limit removal of roadside hedgerow and possible tree removal to provide frontage development, footpath and visibility splay to Woodbastwick Road.*

- *Protection measures may need to be taken for grass snakes identified on site."*

Strong support is given to the identification of this site for allocation and the bullet point policy criteria.

However, objection is raised to the arbitrary identification of a 15-20 dwelling capacity for the site based on unpublished school capacity data for the village cluster as detailed in response to Questions 45 and 46 above.

It is acknowledged that the site will be required to deliver affordable housing as part of the development, however as highlighted in the response to Question 27 above, the request for 33% affordable housing needs to be justified by up to date and robust evidence.

Finally, the extent of the site allocation boundary as proposed by the Council is required to be amended to reflect the extent of land available in light of recent employment development along Woodbastwick Road.

We would also welcome the opportunity for continued engagement to share supporting technical information for the site.

#### **Disclaimer**

Data Protection and Freedom of Information

The Data Controller of this information under the General Data Protection Regulation (GDPR)2018/Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

Once comments have been checked and verified they will be available online (with respondents' names) for others to see. Any representations which are deemed to contain offensive comments will be removed from the consultation site. Whilst we will include names on our website, we will remove personal contact details such as addresses, telephone numbers, emails and signatures before publishing.

If you wish to comment but feel that you have a strong reason for your identity to be withheld from publication, you can contact your District Councillor who will put forward your comments as appropriate. Please note that where you submit your views in writing to your local District Councillor, this is described as "lobbying" and the local member will be obliged to pass these on. The local District Councillor will be required to provide your details to the GNLP where they will be stored for their records.

Please note, however, that if you subsequently wish to comment as part of the formal Regulation 19 stage of the Greater Norwich Local Plan (due to take place in 2020) comments must be attributable for the public examination by the Planning Inspectorate.

See our Privacy notice here <http://www.greaternorwichlocalplan.org.uk/> for information on how we manage your personal information.

**Declaration**

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name Lydia Voyias

Date 16/03/2020

**Greater Norwich –Regulation 18 Draft Local Plan Response Form**

FOR OFFICIAL USE ONLY

Response Number:

Date Received:

Your completed form should be returned to the Greater Norwich Local Plan team **no later than 5pm on Monday 16 March 2020.**

If you have any further questions about the ways to comment, or if you need consultation documentation in large print, audio, Braille, an alternative format or a different language, you can email us at [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk) or phone us on 01603 306603.