



Brettingham House, 98 Pottergate, Norwich NR2 1EQ
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Our Ref: 0415

22 March 2021

Greater Norwich Growth Board

Dear Sirs

Greater Norwich Local Plan Regulation 19 Draft Strategy and Site Allocations – Land west of New Road, Hethersett.

Background

These representations are submitted on behalf of Glavenhill Limited to the Greater Norwich Local Plan (GNLP) Regulation 19 Draft Strategy and Site Allocations Process.

The representations relate to land to the west of New Road, Hethersett. The land is being promoted by Glavenhill on behalf of the landowner for much needed SME scale housing and / or residential care accommodation and can, through appropriate landscaping, offer long term protection to the Strategic Gap between Hethersett and Wymondham.

Land to the west of New Road, Hethersett was promoted through the Greater Norwich Local Plan Regulation 18, Stage A Site Proposals and Growth Options process in March 2018 (site reference GNLP0480) for approximately 42 dwellings and/or sheltered housing and/or housing with care - see **Appendix 1** for site boundary.

The site was later identified as a reasonable alternative site for residential allocation within the Regulation 18, Stage C consultation in March 2020, but was not identified as a preferred allocation due to outstanding questions over the level of additional growth that is needed in the Key Service Centre of Hethersett.

Glavenhill submitted representations to the Regulation 18 Stage C consultation supporting the identification of Hethersett as a Key Service Centre but objecting to elements of the proposed Sustainable Growth Strategy, in particular, the amount of growth being dispersed to rural parts of the plan area away from the identified Strategic Growth Area and sustainable Key Service Centres such as Hethersett. They confirmed in those representations that the proposed allocation site is suitable, available and deliverable and through its allocation, will assist in addressing the misdirected housing growth.

On the request of the Greater Norwich Growth Board, Glavenhill submitted a Statement of Common Ground and an updated master plan drawing showing how the site could be delivered in addition to a separate parcel of land to the west (**Appendix 2**) to the GNLP process in October 2020.

These latest representations are made in response to the current GNLP Regulation 19 Draft Strategy and Site Allocations process. Hethersett continues to be identified as a Key Service Centre within the proposed Growth Strategy which Glavenhill support, albeit the level of growth attributed to it remains their concern.

Whilst the Council has reassessed the proposed allocation site's development potential as part of the Regulation 19 process (under site reference GNLP 0480R), it remains unallocated within the draft Plan but a 'reasonable alternative' site for the Council.

The Council's latest assessment of the site, contained at Appendix B of the GNLP Regulation 19 Evidence Base Site Assessment Booklets, concludes:

"This site was a reasonable alternative if additional growth was needed in key service centres. However, there was no requirement to maximise development in KSCs. The site is within the strategic gap between Hethersett and Wymondham, and on balance the landscape impact outweighed the need for additional homes in Hethersett."

Whilst Glavenhill support the Council's conclusion that the site is suitable for residential development and therefore a reasonable alternative, they continue to assert that the Council's rationale for not allocating it is unjustified and therefore 'unsound' when considered against paragraph 35 of the National Planning Policy Framework.

These Representations

Glavenhill support the identification of Hethersett as a Key Service Centre but object to elements of the draft GNLP Sustainable Growth Strategy (see Glavenhill's response to Question 13 of the Regulation, Stage C consultation which remains relevant). In particular, they are concerned at the amount of dispersal to rural parts of the plan area away from the identified Strategic Growth Area and contrary to the vision to support growth in the Cambridge-Norwich Hi-Tech corridor. It may also conflict with the specified aim to help combat climate change. This is particularly the case within South Norfolk where 1,200 homes, on yet to be identified sites, could all be allocated in small cluster villages in the rural parts of the District (outside of the old Norwich Policy Area). Furthermore, major allocations are proposed in Diss and Harleston, both well outside of the strategic growth area. Glavenhill therefore recommend that the quantum of allocations in these more rural areas should be reduced, with the focus redirected to the Strategic Growth Area, particularly to support the stated ambitions for the Cambridge-Norwich Hi-Tech corridor.

In line with this suggested approach, a justified and positively prepared strategy would be to allocate additional land for housing within the Key Service Centre of Hethersett and thus, in reflection of the Council's categorization of the enclosed site as a 'reasonable alternative', allocate it for housing.

This site can provide housing in a sustainable location, to support job growth within the Hi-Tech corridor and where it can benefit from being within close proximity and with good public transport links to, higher order services in Norwich and Wymondham. Currently, the draft Plan proposes an uplift in housing numbers (200) on the existing strategic site to the north of Hethersett. Allocating the enclosed proposed allocation site would help provide greater choice within the market, an opportunity for small builders and importantly, increase the prospect of delivering the required housing numbers within the plan period.

The Proposed Allocation Site

This proposed allocation site is located immediately to the south of existing residential development on the south-west side of New Road Hethersett. It extends up to the junction with the B1172.

Existing residential development to the north-east of New Road faces the site. The site is immediately adjacent to the defined settlement boundary of Hethersett.

The site comprises open arable fields. It is bounded by a wide grass verge and mature 4-metre high hedge along most of its frontage with the B1172. There is a pavement on both sides of the B1172. The boundary to New Road comprises 1.5-metre high mature hedging interspersed with individual oak trees. There is an existing pavement along the north-east side of New Road and bus stops either side of the road with services to Norwich and Wymondham.

The Preferred Development Option Plan (**Appendix 2**) shows one way in which the site could be developed to accommodate in the region of 40 dwellings and/or sheltered housing and/or housing with care for the elderly and a 3.08 ha park on adjacent land. The land to the west is shown for indicative purposes only and is subject to separate representations.

Bungalows could be provided as a part of the mix and to soften the rural edge of the site.

Access to the site can be achieved from New Road as shown on the previously submitted Access Plan.

The site has no over-riding constraints that would prevent its development.

The suitability of the site for housing is not refuted by the Council. The site has been discounted purely on officer's assertion that *"there is no need to erode the strategic gap and this site is not needed as an allocation."* (GNLP Regulation 19 Evidence Base Hethersett Site Assessment Booklet).

Glavenhill has already confirmed in the section above that the allocation of the site and thus additional residential development in this location is entirely justified. It provides a suitable, available and deliverable alternative to the large-scale commitments to the north for which delivery timeframes and overall numbers remain uncertain.

The site benefits from a willing landowner and promoter committed to bringing the site forward for development within the plan period. Furthermore, the site is of an appropriate scale to be attractive to small and medium sized housebuilders who find it difficult to compete for and deliver larger strategic sites and will provide additional choice to the local housing market. It has received good interest from local house builders, who offer their support to these representations.

Whilst Glavenhill accept that the site will involve development on the very edge of the 'strategic gap', the site's positioning and the ability to provide new strategic landscaping to its boundaries, can ensure no significant adverse landscape impact. The Council reached the same conclusion at the Regulation 18, Stage C consultation stage, suggesting that the site is *"reasonably well related to the existing settlement adjacent to the settlement limit, this would not necessarily preclude a sensitively designed development through a new Local Plan allocation."* (GNLP Regulation 19 Evidence Base Hethersett Site Assessment Booklet page 22)

In this and all other respects, the site remains entirely appropriate for allocation within the Local Plan. Its reference as a reasonable alternative and not a residential allocation, whilst reflecting the site's overall suitability, is neither justified or positively prepared and is therefore unsound. This matter can be easily and quickly rectified through the allocation of the site within the forthcoming submission draft Local Plan.



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I trust that the above and enclosed is of some assistance to you in finalising the Local Plan.

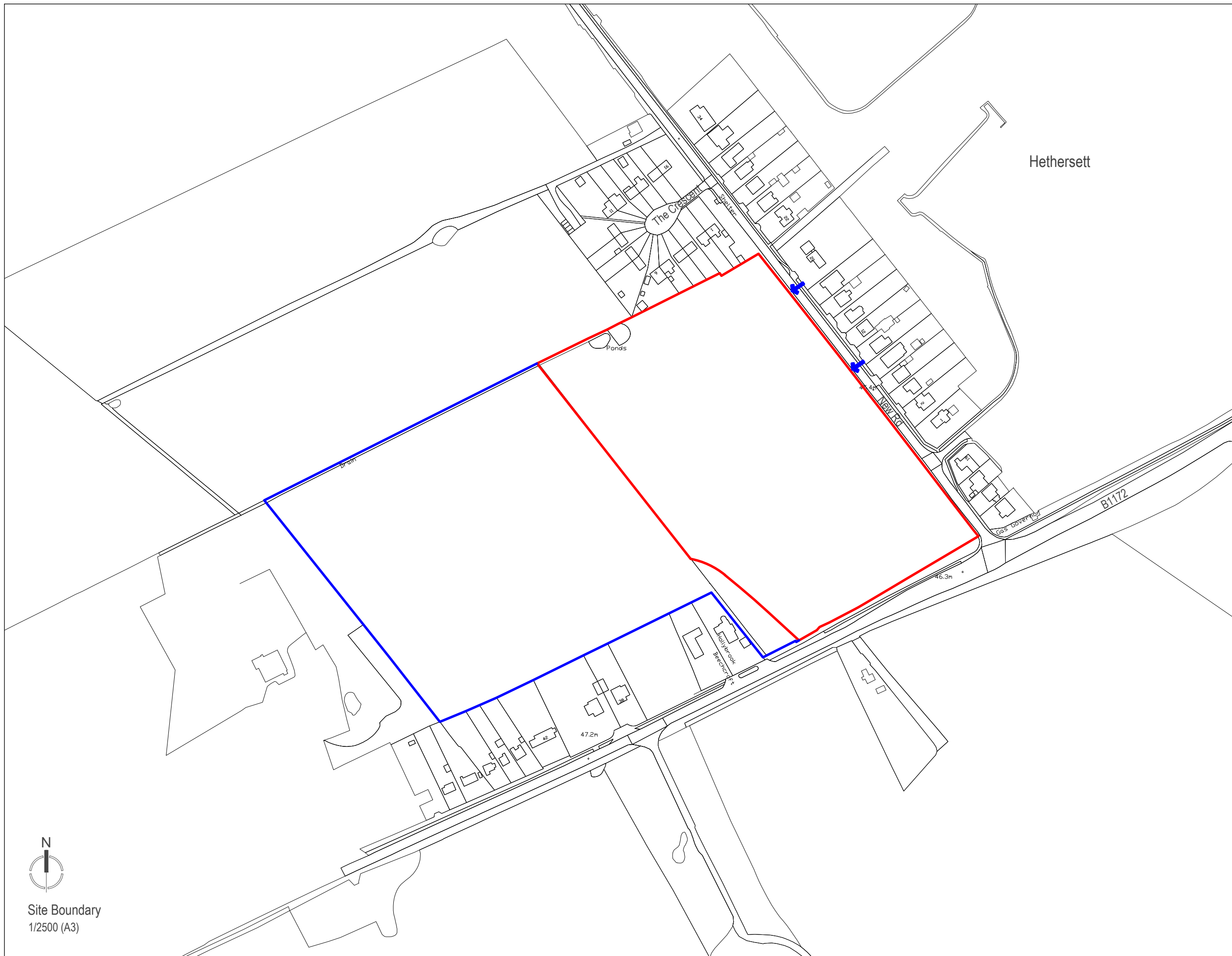
Yours sincerely

Hannah Smith
Associate Director, MRTPI



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Appendix 1 – promoted land



Site Boundary
1/2500 (A3)

Note

SUMMARY

- Land Ownership
- Site Boundary
- ➔ Access

Site Area 4.64 Ha

Hethersett

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Number 0100031673

PROJECT TITLE
New Road, Hethersett I

PROJECT NUMBER
LAN001-0451

CLIENT
Glavenhill

DRAWING TITLE
Site Boundary

DRAWING NUMBER	REV
001	-

SCALE
1/2500 (A3)

DATE
JUNE 2016

DRAWN BY
JBA



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Appendix 2 – promoted indicative masterplan



NOTES

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CDM 2015

The Construction (Design and Management) Regulations 2015 (CDM 2015) makes a distinction between domestic and commercial clients and outlines the duties you, as client, have under Health and Safety Law (HSE).

These duties can be found at:

<http://www.hse.gov.uk/construction/cdm/2015/responsibilities.htm>

It is your responsibility as client to make yourself aware of your role within CDM 2015 and act accordingly.

- 1 Residential access point
- 2 Residential area
- 3 Care Home access point
- 4 Arrival Green Area
- 5 Bungalow
- 6 Extra Care
- 7 Communal Green Area
- 8 Open Area

Type	Unit number and info.	Area
Residential	circa 40 dwellings including Affordable Housing	3.29 acres/ 1.33 ha
Care Homes	60 Bed Extra Care Hub with 25 Extra Care Bungalows	5.14 acres/ 2.08 ha
Green Area	in Care Homes area	2.62 acres 1.06 ha
Open Area		9.46 acres/ 3.83 ha
Total Area		20.51 acres/ 8.30 ha

REVISED BY: -	DATE: -	CHECKED BY: -	DATE: -
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PURPOSE OF ISSUE Issue for comment	RIBA STAGE 02
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DRAWING STATUS Draft

PROJECT TITLE New Road, Hethersett

CLIENT Glavenhill Limited

DRAWING TITLE Masterplan	SCALE 1:2000
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DATE 15/10/2020	DRAWN BY ZL	CHECKED BY PA	APPROVED BY PA
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DRAWING NUMBER			
PROJECT NO 0415/D	TYPE -	UNIQUE NO - 01	REVISION -



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