



Brettingham House, 98 Pottergate, Norwich NR2 1EQ
T 01603 631 319 F 01603 628 464 E info@lanproservices.co.uk

19th March 2021

Our ref: 1493/Reg19rep

Regulation 19 Submission Consultation

Sent via email to: GNLP@norfolk.gov.uk

Dear Sir / Madam,

**Re: Re: Greater Norwich Local Plan, Regulation 19 Publication Consultation, March 2021
Broadland Village Clusters, Blofield Heath and Hemblington – Land at Dawsons Lane**

Background

These representations are submitted in respect of the Broadland Village Clusters aspect of the plan and in particular, residential allocations at Blofield Heath.

Lanpro represent PPAP Investments Ltd, who act on behalf of the owners of the land at Dawsons Lane, Blofield Heath (GNLP site reference 2080 – see map extract at **Appendix 1**). The site has been the subject of previous representations to the GNLP including in March 2020 (see **Appendix 2**).

The eastern portion of the subject land was originally approved on Appeal, to the benefit of PPAP, for 8 dwellings (February 2019). A subsequent approval was issued by Broadland District Council under application ref: 20190844 for 12 dwellings, in November 2019. This was subsequently varied under a Section 73 application Ref: 20200345 (to vary drainage and boundary treatment details), approved in September 2020. The approved layout for 20200345 is provided at **Appendix 3**.

The development subject of 20190844 and 20200345 is currently under construction and well advanced, as further discussed below.

We submit, as set out in these representations, that the additional undeveloped land within GNLP2080 to the west of 20190844, is sustainably located, deliverable and should be allocated in the GNLP.

The site has been previously assessed by the GLP team as being an ‘unreasonable’ alternative on the basis that:

Although this site is adjacent to the existing settlement limit it is considered to be unreasonable for allocation as there is no continuous footway to Hemblington Primary School. There is a better located site to meet the capacity of the cluster. In addition, the proposed access to the site is currently a narrow track with an unmade surface which would need upgrading to be acceptable.

As such the Reg 19 plan seeks to allocate land at Wodbastwick Road under:

- Policy GNLP1048R, Land east of Woodbastwick Road, Blofield Heath (approx. 0.64ha) is allocated for residential development. The site is likely to accommodate approximately 20 homes.

Assessment of GNL2080

Footway to Hemblington Primary School

The development subject of 20190844 and 20200345 for 12 dwellings provides a new section of footpath which has now been constructed from Dawsons Lane along Blofield Corner Road eastwards to meet with the existing footway at Skedge Way. This links into the existing footway network, which is continuous along Blofield Corner Road, northwards along Woodbastwick Road and east along Mill Road to Hemblington Primary School. Therefore, a continuous footway link to the settlement and school is available. Pictures of the new footway have been provided below.

Before - View looking eastwards along Blofield Corner Road where the proposed footpath was proposed to be constructed. (Image taken from Street View on Google Maps).



Current - View looking eastwards along Blofield Corner Road demonstrating the implementation / delivery of the approved footpath, that now provides a continuous footpath link to Hemblington Primary School. (Photo taken on 16th March 2021).



Location and Sustainability of the Site

The sustainability and suitability of the Dawson's Lane site for residential development has already been assessed and supported by a Planning Inspector and Broadland District Council via two planning approvals for 8 and 12 dwellings respectively. The Inspector concluded in paragraph 29 of the appeal decision that *"I agree with the Council in this regard that the development would be in a relatively sustainable location in transport terms; hence its Service Village status and capacity for small-scale housing growth."* The location of this site and its proximity to these services has been considered twice through the granting of planning permission and found to be acceptable.

As such, the land to the west of the site subject of 20190844 and 20200345 is sustainably located and capable of accommodating a minimum of 15 dwellings.

Proposed Access to Dawson's Lane

The recent development at Dawson's Lane has resulted in the upgrading of the surface and widening of the lane to allow two cars to pass and bringing it up to an adoptable standard from the junction with Blofield Corner Road up to the site access. This was approved by Norfolk County Council Highways during the planning process. This improvement has now been delivered / completed and no additional off-site improvement works would be required. Pictures of the upgraded Dawson's Lane have been provided below.

Before - View looking along Dawson's Lane from Blofield Corner Road. (Image taken from Street View on Google Maps.)



Current - View looking along Dawson's Lane from Blofield Corner Road demonstrating the implementation of the approved highway improvements. (Photo taken 16th March 2021).



Deliverability

As noted above, infrastructure works have taken place associated with the approved development that addresses the identified shortcomings of the wider GNLP2080 site. Development has commenced on site and houses are currently being constructed, marketed for sale with the completion of the site expected in 2022. Any further phases of development are eminently deliverable and suitable infrastructure is in place.

It is noted that the BLO5 allocation which is to be 'rolled-over' into the GNLP, was originally approved for development under an outline permission in 2015. Clearly, development sites do take some time to come forward. There is no evidence that the site to be allocated under new policy *GNLP1048R, Land east of Woodbastwick Road* can be considered to be deliverable in a reasonable time, whereas PPAP Investments have the ability and capacity to deliver at Dawson's Lane.

Allocating GNLP2080, will secure deliverable housing in the Broadland administrative area which, we submit, is a sounder approach to the plan.

Notably, PPAP Investments Ltd have a track record of delivering affordable homes, within a wider mix of tenures, within their developments. Four of the 12 dwellings within 20190844 / 20200345 are affordable, which is in excess of the current policy requirement.



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Conclusions

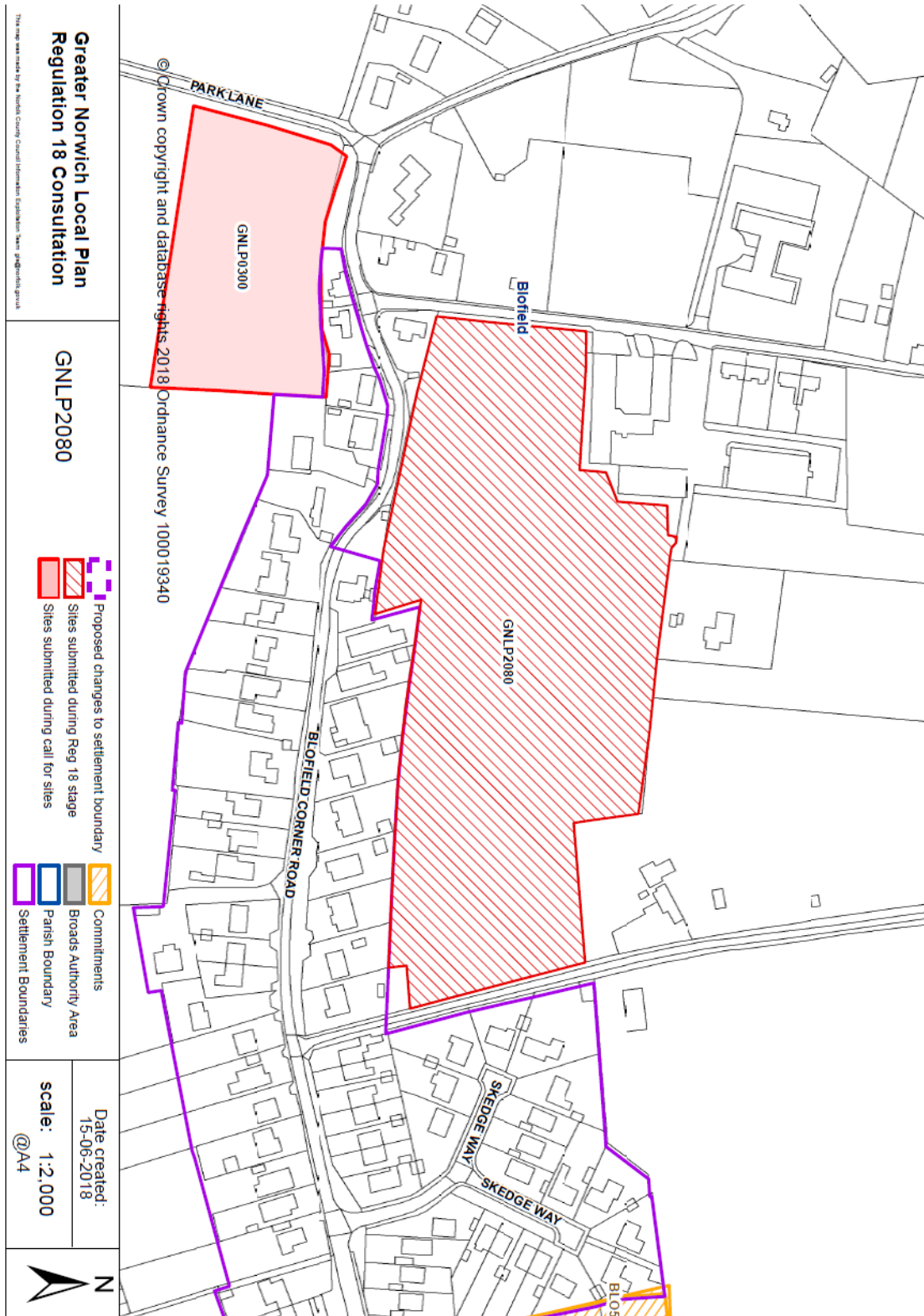
Taking the above into consideration, the remainder of GNL2080 is considered to be suitable for residential development and allocation in the plan. As such, the site should therefore be allocated for residential development within the Blofield Health and Hemblington village cluster.

Yours sincerely,

Ian Douglass
Head of Planning

cc. PPAP Investments Ltd.

Appendix 1 – Site GNLP2080 submitted during GNLP Reg 18 Stage 2018





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Appendix 2 – GNLP rep March 2020



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Appendix 3 – Approved layout for 20200345