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Our ref: 0953P

Greater Norwich Local Plan
Sent via email to: GNLP@norfolk.gov.uk

Dear Sirs,

Greater Norwich Local Plan Regulation 18 Draft Plan ref: GNLP2166 Land south of Warren Road, Rackheath

This representation is made on behalf of the landowners of the above site to the current Regulation 18 consultation. The site has been considered by the Greater Norwich Local Plan (GNLP) as “unreasonable”.

Background

The site is located in the area covered by the ‘Growth Triangle Area Action Plan’. It is adjacent to allocated site GT7 (south west of the site) which is a large strategic allocation for 56 ha and has planning permissions which total in the region 1,200 new homes along with new community facility including a site for a new primary school. This development is now starting to be developed with reserved matters application starting to be submitted.

On the northern side of Salhouse Road is site GNLP0132 which is proposed as a “preferred” housing allocation for 1,200 new homes. This is located adjacent to existing allocation GT20 in the Growth Triangle Area Action Plan which is a site of 20ha allocated for mixed use, with the phase 2 of the site currently subject to a planning application of 516 dwellings by a consortium of national house builders. Phase 1 of the site (1233 homes, recreation space and primary school) is currently being built out by the same consortium.

In October 2018 the GNLP published an Addendum to their Housing and Economic Land Availability Land Assessment (HELAA). The purpose of this Housing and Economic Land Availability Assessment (HELAA) addendum is to update the December 2017 HELAA which was originally published as part of the Regulation 18 Greater Norwich Local Plan (GNLP) consultation that took place between January and March 2018.

As part of this process, the site (GNLP2080) was submitted and assessed under the traffic light system. For the purposes of the HELAA capacity assessment this site was considered to be ‘suitable.’

As can be seen from the traffic light assessment the site is split between amber and green with no red. This site suitability concludes that whilst highways consider the site to remote it is accessible to core services in Rackheath, there is no constraints relating to the loss of open space. It does not identify any constraints that cannot be dealt with through the normal course of preparing a planning application.

Since this time, the site (GNLP2166) has been considered to be an “unreasonable site for residential” as part of the new allocations of the Village Cluster, as proposed under the Greater Norwich Local Plan.

Reasons to be considered unreasonable:

- Within the landscape buffer to the Broadland Northway;
- Impact on Rackheath Hall; and
- Access to facilities.

Assessment

- **Land is located within the landscape buffer to Broadland Northway**

The site is located within an area shown in the Growth Triangle Area Action Plan as a landscape buffer. The indicative site layout acknowledges this designation by virtue of the amount of green space shown within it. Within the consultation document, map 8 shows GI corridors across the Greater Norwich area which this site does not fall within.

The development within areas that have otherwise been identified as being 'protected' should be considered in the context of the delivery rates in this area.

The delivery statement claims a proactive approach to delivery through only allocating housing sites where a reasonable prospect of delivery, taking into account delivery requirements of the plan can be evidenced.

However, no evidence of delivery of the 36,000 commitments and existing allocations being carried forward is provided within this consultation. It is noted that 13,430 of the commitments are in the Growth Triangle where delivery has been slow to date.

Lanpro have queried the lack of availability of delivery evidence and been informed that this information will be provided at the Regulation 19 stage. In our view this is too late for consultees to be able to make any meaningful comments on the likely delivery of these commitments which make up 82% of the required housing numbers to 2038.

In order to be able to test and influence the soundness of the chosen strategy this information is needed at an earlier stage than Regulation 19. It is accepted that the information may change over time, but the current document identifies a commitment figure at this point in time that the Greater Norwich Partnership are asking consultees to assume is deliverable with no evidence to back this up. Evidence of this should be provided prior to Regulation 19 to enable proper opportunity for review and comment by consultees and the potential to suggest changes to the strategy that could be taken on board prior to the Regulation 19 consultation stage.

It is acknowledged that development of this site would need to consider having landscaping buffers and areas in it to address any concerns regarding impacts but this should be considered in the context of testing how deliverable all of the carried forward allocations are in this location which has had much slower delivery rates than anticipated.

- **Impact on Rackheath Hall**

Rackheath Hall is a Grade II listed building which is located between Salhouse Road and Wroxham Road. The hall sits within a large area of parkland and is largely surrounded by dense woodland. The Hall was converted into apartments in 2003 which required substantial works to be carried out.

Site GNLP2166 is located approximately 920m south west of Rackheath Hall (measured from the northern boundary of the site as the crow flies to the Hall. Location in accordance with Historic England mapping).

The boundary of 'preferred' site allocation GNLP0132 is located approximately 310m west from Rackheath Hall and would border the Hall's surrounding parkland. Site GNLP0132 is proposed for 1200 new homes where as site GNLP2166 is only indicatively showing a capacity of around 200 homes. When comparing the two sites, it does not appear that a conclusion can sensibly be reached that a site three times further away and 6 times smaller would cause more impact upon the historic setting of the Hall or its gardens compared to the 'preferred' site which sits adjacent to the heritage asset.

As noted, previously, Rackheath Hall is surrounded by dense woodland, therefore there is not considered to be any views between there and site GNLP2166.

It should be noted that Broadland Northway is located approximately 440m east of the site. Again, considerably closer than this site.

In summary, development of this site will not cause impact upon Rackheath Hall and its historic parkland. As part of the preparation of any planning application, the applicant would consider the implications on heritage assets in the vicinity of the site and the design and landscaping proposals can be taken into account.

- **Access to facilities – Rackheath Primary School**

GNLP2166 is located adjacent to existing site allocation GT7 which requires the site for a new primary school within it, therefore the application site would be in close proximity to a primary school. Whilst there are currently no timescales for delivery of the school this has been secured through a legal agreement and will at the appropriate time come forward. A new primary school has opened recently 'White House Farm Primary School' which is located in the site referenced as GT20.

Within the Growth Triangle Area Action Plan policy GT3 requires a Bus Rapid Transit (BRT) to be delivered which will link Rackheath to Norwich. All applications along Salhouse Road/Guerny Road are required to safeguard land to facilitate this. The BRT will also include a land for cycle link to support improved cycle facilities and linkages.

In summary, as noted above, the HELAA identifies that the site is accessible to core services in Rackheath. The site is located in an area that has been identified for significant growth and is adjacent to a site which has permission for delivery of a new school and services within. Therefore, the site is considered to be well located in relation to services.



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Summary

Taking the above into consideration site GNLP 2166 is considered to be suitable for residential development, and doesn't generate any significant harm that could not be dealt with during the normal course of preparing a planning application.

Yours sincerely

J. Crichton

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