



**GREATER NORWICH LOCAL PLAN – PRE-SUBMISSION  
DRAFT PLAN (REGULATION 19) CONSULTATION  
MARCH 2021**

**Land at Briar Farm, Harleston**

**Site References: GNLP2136**

**Prepared by Strutt & Parker on behalf of M Scott Properties Ltd**

**March 2021**

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Site Name:	Land at Briar Farm, Harleston
Client Name:	M Scott Properties Ltd
Type of Report:	Greater Norwich Local Plan – Pre-Submission Draft Plan (Regulation 19) Consultation, March 2021
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Date:	March 2021

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## 1. INTRODUCTION

- 1.1 This representation has been prepared on behalf of our clients, M Scott Properties Ltd (Scott Properties) in response to the publication of the Pre-Submission Draft of the Greater Norwich Local Plan (Regulation 19) Consultation. This response is made in respect of Land at Briar Farm, Harleston (Site Reference: GNLP2136) (the Site), which is proposed as a mixed-use allocation in the Draft Local Plan – Part 2 Site Allocations Document, Section 4, Main Towns, Redenhall with Harleston, New Allocations, Policy GNLP2136: Land at Briar Farm, Harleston.
- 1.2 The proposed allocation of this Site is strongly welcomed on the basis that it is a deliverable site. It is available now, in a suitable location and there is a realistic prospect that housing will be delivered on the Site within the next five years. The Site will bring much-needed new market and affordable housing, care, retail and recreational opportunities to Harleston.
- 1.3 Scott Properties is currently working with Saffron Housing Trust to prepare a hybrid planning application to bring the Site forward and is actively engaging with the local planning authority through their pre-application process. Scott Properties is also undertaking community engagement initially with the Town Council and community groups, with wider public consultation scheduled to commence shortly.
- 1.4 This representation supports the allocation of the Site through Policy GNLP2136 and should be considered in conjunction with the following supporting information:
- Regulation 19 Publication Representation Form;
  - Site Location Plan;
  - Sketch Accommodation Plan Drawing. No: 154-20 0301 Revision P8;
  - Statement of Common Ground; and,
  - Pre App Response Letter dated 16<sup>th</sup> November 2020.

## 2. BACKGROUND POLICY CONTEXT

- 2.1 The “*presumption in favour of sustainable development*” is at the heart of the National Planning Policy Framework 2019 (NPPF). The Planning and Compulsory Purchase Act 2004 (Section 39(2)) establishes a legal requirement for plans to be prepared with the objective of contributing to the achievement of sustainable development.
- 2.2 Paragraph 16 of the NPPF requires plans to be prepared positively in a way that is aspirational but deliverable (emphasis added). Paragraph 59 reminds Local Planning Authorities that the Government’s objective is to significantly boost the supply of homes (emphasis added) and that it is therefore important that a sufficient amount and variety of land comes forward where it is needed.
- 2.3 To achieve sustainable development, the planning system has three overarching objectives which need to be pursued in mutually supportive ways, an economic objective, a social objective and an environmental objective. The NPPF indicates that planning policies should play an active role in guiding development towards sustainable solutions.
- 2.4 Planning Policies are required to identify a supply of specific, deliverable sites for the first 5 years of the plan period and specific, developable sites (or locations for growth) for the next 5 to 10 years. Paragraph 72 states that: ‘*The supply of a large number of new homes can often best be achieved through planning for large-scale development, such as new settlements or significant extensions to existing villages and towns...*’
- 2.5 The Greater Norwich Local Plan (the Plan) has been prepared to provide a framework to guide development and facilitate growth in the combined plan areas of Broadland District, Norwich City Council and South Norfolk Council over the period from 2018 to 2038.
- 2.6 The Plan has been published to allow representations to be made before it is submitted for examination. As set out in the Planning and Compulsory Purchase Act 2004 (as amended) the purpose of examination is to consider whether the Plan complies with the relevant legal requirements, including the duty to cooperate, and is sound. This representation has been prepared to support the inclusion of Policy GNLP2136 in the Plan and to demonstrate that the inclusion of the policy is sound.
- 2.7 As set out at Paragraph 35 of the NPPF, for plans to be “sound” they need to be:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

2.8 These tests need to be applied in a proportionate way to ensure they are consistent with strategic relevant policies for the area.

### **3. REGULATION 19 PUBLICATION PRE-SUBMISSION DRAFT PLAN**

- 3.1 At paragraph 155 of the Plan in respect of housing, the Delivery Statement indicates that the Plan promotes a proactive approach to delivery through only allocating sites where a reasonable prospect of delivery can be evidenced with the objective of ensuring that housing needs to 2038 will be fully met.
- 3.2 At paragraph 267 the Plan also acknowledges the Government's objective of significantly boosting the supply of homes.
- 3.3 Scott Properties supports the identification of Harleston as a Main Town under Policy 1: The Sustainable Growth Strategy, Policy 7: Strategy for the Areas of Growth and Policy 7.2: The Main Towns. The town has good range of speciality shops, a local supermarket and a full range of local services including doctor's surgery, pharmacy, dentist, primary school, secondary school, leisure centre, library, a variety of sports clubs and a local employment base, making it a sustainable location for new development.
- 3.4 Whilst the Plan's strategy for growth is to focus some 60% of new housing to the Norwich urban fringe, the Main Towns are expected to deliver 6,806 new homes, 14% of the total housing growth. Harleston is identified to deliver 727 new homes over the Plan period, an important strand of the Plan's overall delivery strategy. The Main Towns are sustainable locations for growth and as set out above, Harleston contains a full range of services and facilities, making it an ideal location for new housing to meet the rural housing needs of the Plan area. The inclusion of the Site at Briar Farm (GNLP2136) will make a significant contribution to the Town's growth and housing delivery, accommodating over half of the Town's required new homes.

#### **Policy GNLP2136: Land at Briar Farm, Harleston**

- 3.5 The inclusion of the 27-hectare Site at Briar Farm, Harleston (GNLP2136) is strongly supported. It is one of two new site allocations identified to provide Harleston with an additional 555 new homes and is the only new mixed-use allocation proposed within the settlement. Harleston has a total of six allocations identified in the Plan, including four carried forward from the South Norfolk Local Plan, which it is intended will deliver 727 new homes over the Plan period. This includes two carried forward employment sites which will help ensure that a suitable balance between employment and housing development is maintained.
- 3.6 The Site comprises agricultural land to the east of Harleston, within the arc of the A143 bypass (forming the eastern boundary). It is made up of a number of agricultural fields and associated farm buildings and hard standings. The western boundaries of the Site adjoin the existing residential development and new residential development sites which were allocated in the Joint Core Strategy (2011). The Fuller Road industrial estate lies to the south-west on the western side of Mendham Lane and the southern boundary adjoins existing allotments.
- 3.7 It should be noted that the Site's allocation area, as shown in Figure 1 overleaf does not reflect the correct boundary of the Site in respect of a small section of the western

boundary. A small area of this forms part of the public open space associated with a previous development on land to the west of the Site (application reference 2012/5030). There is also a small area to the east of the aforementioned development area which has been excluded from the allocation area, but which forms part of the Site being promoted. The Location Plan attached to this representation shows the boundaries of the Site, and it is suggested the allocation boundary be amended accordingly to ensure this reflects the actual position.

- 3.8 Given the Site is within the control of a single Promoter, it can be brought forward quickly without any complex legal issues around site assembly.

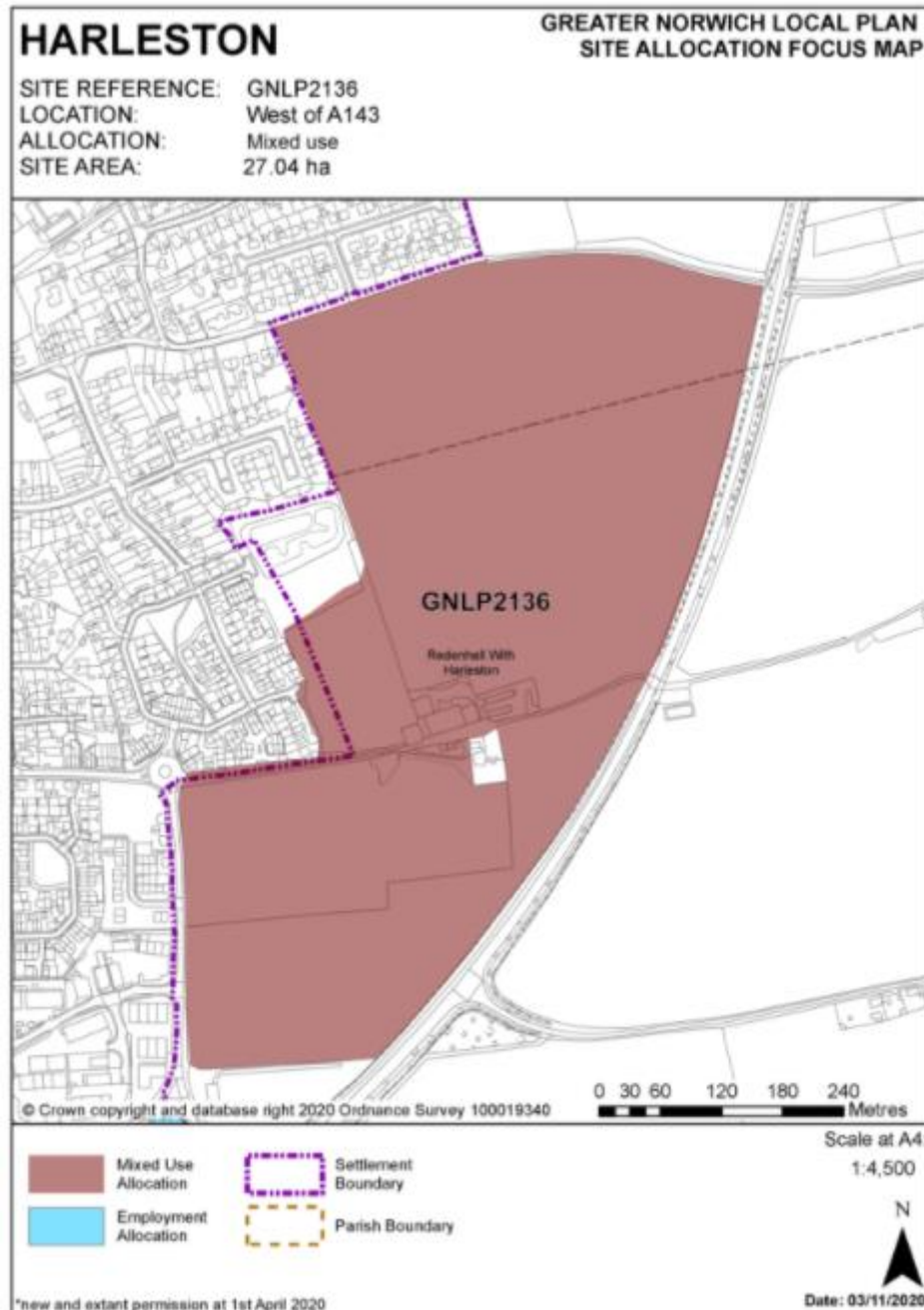
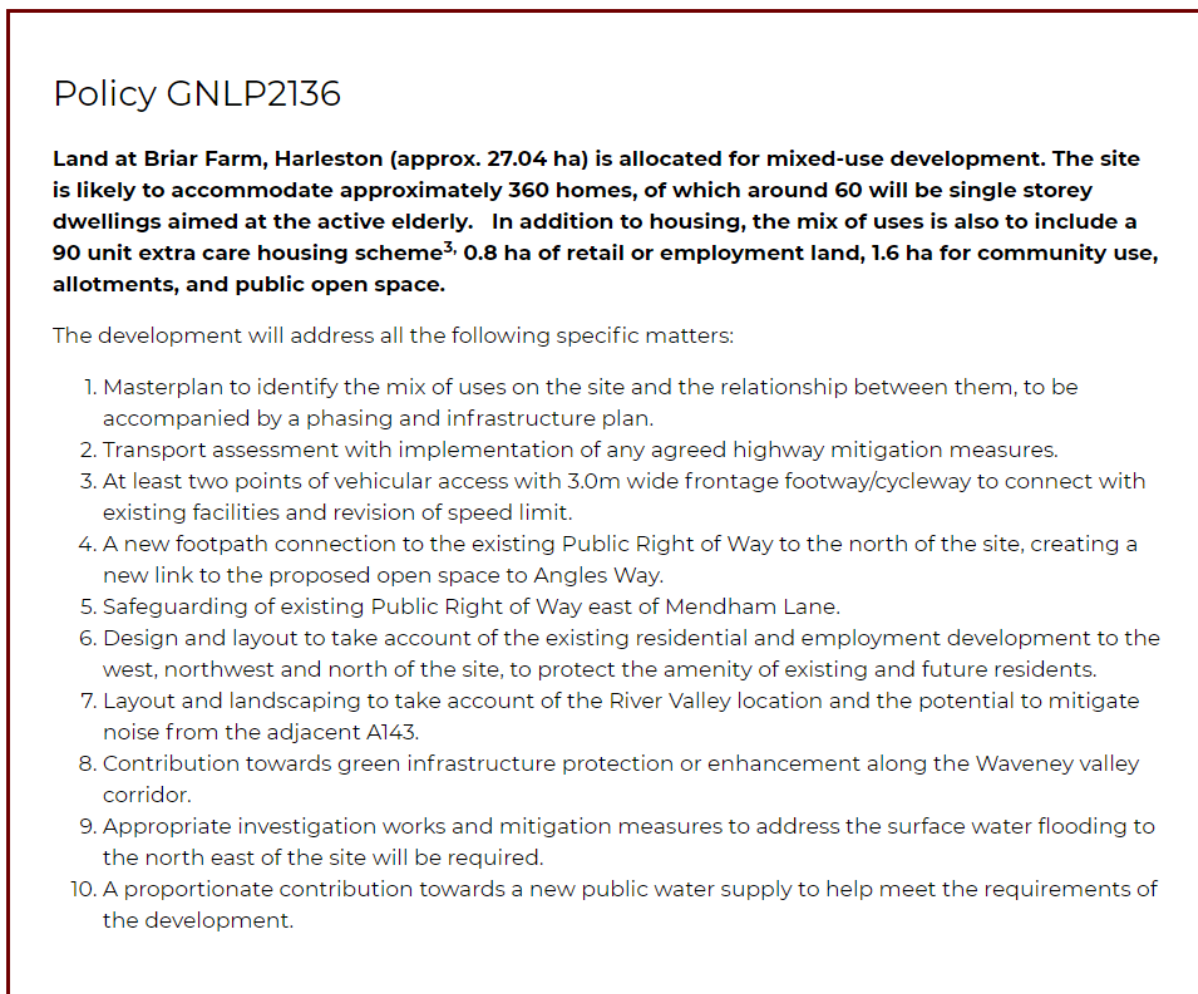


Figure 1: Site Allocation Focus Map



- 3.9 The proposed policy text is set out at Figure 2 below which requires a mixed-use development to include housing, bungalows, extra care housing, retail or employment land allotments, public open space and land for community use.



**Figure 2: Policy GNLP2136**

- 3.10 Scott Properties supports the provision of approximately 360 homes within the policy, increased from 300 homes within the Regulation 18C version of the Plan. It is considered that the increase in homes is consistent with national policy, which requires planning policies to support development that makes efficient use of land (paragraph 122, NPPF). As demonstrated within the Sketch Accommodation Plan drawing accompanying this representation, the proposed number of dwellings can be comfortably accommodated on the Site, whilst achieving a well-designed and attractive development, in accordance with criterion (e) of paragraph 122 of the NPPF. The policy wording includes the requirement for single-storey dwellings, which Scott Properties fully endorses given the identified housing requirement for 3,857 specialist retirement units in Greater Norwich within the Plan period, as detailed within paragraph 276 of the Plan.
- 3.11 The current proposals for the Site have been developed having regard to the above policy requirements. These are shown on the Sketch Accommodation Plan drawing included with this representation, which demonstrates that it is possible to deliver all the required uses proposed in the Policy. A planning application is being prepared for submission later in 2021, which will include a 90-unit extra care block, alongside 16 independent living

bungalows. These are proposed to deliver on Norfolk County Council's 'Living Well' initiative which facilitates affordable independent living where levels of care do not exceed 12 hours per week.

- 3.12 It is intended that this part of the development will be delivered by Saffron Housing Trust. The remaining residential elements, both market and affordable units, as well as the policy compliant proportion of bungalows, will be delivered by a regional house builder. Active discussions with housebuilders are currently being progressed. It is intended that the retail or employment land element will be developed by a retail operator, and again active negotiations are currently in progress to secure a suitable end user.
- 3.13 The mix of end-users and range of accommodation types mean that the Site can be developed more quickly. Furthermore, the range of house types and incorporation of an element of extra care and single-storey units aimed at the active elderly, will also allow the development to be brought forward more quickly avoiding concerns, as highlighted in the Letwin Review, around market absorption.
- 3.14 It is noted that Policy 5 of the Plan supports accessible and specialist housing, especially on sites which have good access to local services. Paragraph 277 indicates that the aim of this is to integrate older people with the wider community, assisting active retirement and community cohesion. Site GNLP2136 will clearly make a significant contribution to meeting the objectives of Policy 5, which the Plan acknowledges.
- 3.15 As set out in the revised Statement of Common Ground, it is anticipated that the housing development could commence in 2022 and would all be delivered by 2028. This will mean that delivery on Site will commence early in the Plan period, supporting the delivery of the Council's five-year land supply and housing delivery and delivering in the years 2025 and 2026 when the Housing Trajectory (Appendix 6) is most vulnerable.
- 3.16 The supporting text for Policy GNLP2136 at paragraph 4.34 and 4.35 indicates that a masterplan and transport assessment will be necessary for the Site and that early engagement with statutory consultees is recommended. As demonstrated by the Sketch Accommodation Plan attached to this representation, a masterplan is being developed in accordance with policy aspirations. A number of meetings have been held with planning officers including a formal pre-application meeting on 23<sup>rd</sup> October 2020 along with the subsequent follow-up meetings which have resulted in further refinements to the layout plan. This dialogue is on-going.
- 3.17 Scott Properties has also begun consultation with the local community and utilities providers which has included three separate meetings to date with the Town Council. Further meetings and community engagement are planned over Spring and Summer 2021.
- 3.18 In addition, highway and drainage consultants are also actively engaging with the County Council as both Highway Authority and Lead Local Flood Authority. The detailed guidance and advice which has been provided is also being incorporated into the emerging masterplan for the Site and a full transport assessment will accompany the forthcoming planning application.

- 3.19 It is proposed that the planning application on the Site will be in hybrid form, with the residential element being a full application and outline permission being sought for the extra care housing scheme and retail element. The intention of this is to ensure that commencement on Site can start in 2022, so that housing delivery is not delayed.
- 3.20 In respect of the tests of soundness it is considered that the allocation of Site GNLP2136 can be considered sound. The Plan's strategy for Harleston has been positively prepared in that it seeks to meet the area's housing needs in a practical way which is consistent with achieving sustainable development. The strategy is justified and based on a proportionate evidence base. The allocation of Site GNLP2136 is considered to be effective and for the reasons set out above the Site is clearly deliverable over the Plan period, and will in fact, be able to deliver early in the Plan period, supporting the Council's five-year housing land supply and housing delivery trajectory.
- 3.21 Finally, allocation of the Site is considered to be consistent with the policies of the NPPF, as a mixed-use development which will deliver environmental enhancements through the extensive open space proposed, community benefits and land for community use, both market and affordable housing, older persons' accommodation and retail uses. As such it can clearly be considered to meet the economic, social and environmental objectives for sustainable development as required by national planning policy. Furthermore, development of the Site will clearly contribute towards the Government's objective of significantly boosting housing supply and make an efficient use of land.

## 4. CONCLUSION

- 4.1 Paragraph 16 of the NPPF requires plans to be prepared positively in a way that is aspirational but deliverable. Paragraph 59 reminds Local Planning Authorities that the Government's objective is to significantly boost the supply of homes and that it is therefore important that a sufficient amount and variety of land comes forward where it is needed. Paragraph 72 of the NPPF indicates that the supply of a large number of new homes can often be best achieved through planning for large scale development such as extensions to existing towns. The allocation of Site GNLP2136 is clearly compatible with these objectives. The Site is deliverable and extensive work has already been undertaken along with community engagement to ensure that it can contribute to the District's housing supply, delivering sustainable development in the early part of the Plan period. Accordingly, Scott Properties strongly supports the inclusion of the Site as an allocation in the Plan.
- 4.2 We appreciate that it is unlikely to be considered appropriate for our clients to be represented at the Oral part of the Examination as we are not recommending any alterations or modifications to the Plan and consider that in respect of the inclusion of Site GNLP2136, the Plan is sound. However, we would like to reserve the right to be heard in the event that any subsequent modifications or alterations are proposed in respect of this particular allocation or in the event the Inspector considered it would be helpful for oral evidence to be provided in respect of the Site's deliverability.