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2 August 2020

South Norfolk District Council  
Submitted electronically and by email to: LP@s-norfolk.gov.uk

Dear Sirs

**South Norfolk Village Clusters Housing Allocations Regulation 18 Consultation – Land north of Mulbarton (SN0496 rev)**

**Background**

These representations are submitted on behalf of Glavenhill Limited to the South Norfolk Village Clusters Housing Allocations Plan Regulation 18 ('the draft plan') consultation process.

These representations relate to land to the North of Mulbarton (SN0496 rev) which is being promoted for residential allocation by Glavenhill on behalf of the landowner. The site plan is contained at **Appendix 1**

Land to the North of Mulbarton was promoted most recently to the Greater Norwich Local Plan Regulation 18c consultation process in March 2020 under site reference GNLP0496 for approximately 60 residential dwellings, including bungalows, a care home for elderly care and a doctors' surgery. Alternatively, up to 95 dwellings could be provided without the care home and doctor's surgery sites. Due to its location within a Council identified South Norfolk Village Cluster, it was concurrently promoted by Glavenhill to the South Norfolk Village Clusters Housing Allocations Call for Sites process.

South Norfolk District Council ('the Council') has on further review of the site rejected it as a preferred allocation on the basis that 95 dwellings is larger than being sought in the VCHAP and it is not clear whether the 60 dwellings with a doctors surgery and care home would be (a) deliverable, or (b) possible to require. In addition, they conclude that the site is detached from the rest of the settlement, and has both heritage concerns (impact on the listed church, Paddock Farm, and the Conservation Area) and landscape concerns (erosion of rural character from the public footpaths to the east).

**These Representations**

These latest representations set out why Glavenhill consider the site is suitable for a proposed allocation and confirm the suitability, availability and deliverability of the site for residential growth. Glavenhill and Lanpro have made separate representations in respect of the Spatial Strategy and detailed policy requirements set out in the Village Clusters Plan. Those representations are also relevant to the consideration of this site.

**Support for the Land to the North of Mulbarton**

The proposed allocation site provides a suitable, available and deliverable opportunity to supplement housing supply within a sustainably located settlement.

It can accommodate approximately 60 residential dwellings, including bungalows, a care home for elderly care and a doctors' surgery. Alternatively, up to 95 dwellings could be provided without the care home and doctor's surgery sites.

It is noted that the Introductory section to the Regulation 18 Village Clusters plan confirms that "the main aim of the Plan is "to allocate a series of smaller sites, typically within the range of 12 to 50 homes". Therefore, a scheme that would allow approximately 60 dwellings, care home and site for a doctor's surgery is at the upper end of this range. The Council could choose to limit the housing numbers to 50 on this site in conjunction with a care home and site for a doctors surgery if this is felt to be beneficial. Glavenhill do not consider this should be necessary, but in the event that housing numbers were limited to 50, consider that this would still provide a viable and deliverable scheme.

The intention would be to build circa 50-60 dwellings on the site plus an elderly care home for which there is a clear identified need within the area, plus deliver a site for a new doctor's surgery to enable the existing surgery to relocate or expand should they wish. This is considered to offer a sustainable mix and scale of development for the village.

The Council's comments regarding heritage concerns are noted. However, impacts upon the Listed Paddock Farm, Church and Conservation Area will be minor and less than substantial and the benefits provided by the site in terms of housing delivery, elderly care and site for a doctor's surgery will clearly outweigh any harm. As required by paragraph 202 of the NPPF, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. No development is proposed in the vicinity of the listed Paddock Farm. The site access will sit south of the Farm and will be well screened by proposed hedging. The setting of the Church will also be protected by positioning development away from the boundary of the Church yard. This was an approach that was discussed with Historic England during the course of the planning application and considered to offer an appropriate way forward for this area of the site.

In terms of the landscape impact upon views from public footpaths to the east, the site is already substantially screened by boundary hedging and mature trees. There is ample space within the site to reinforce this further. The site would be suitable to accommodate some bungalow development which could be positioned to further minimise any perceived intrusion into the countryside. Views from the east would therefore be suitably protected. From all other boundaries, the development is well contained and will be very well screened from public view. It is not therefore considered that landscape or heritage impacts are so significant that they should preclude development of this site. It is otherwise accessible, well located in proximity to services and has no other technical constraints that would prevent its development, as already demonstrated through the previous planning application process for the larger site.

Glavenhill therefore consider that the site is suitable to be allocated in conjunction with the Swardeston site at Bobbins Lane (SN0204) and is preferable to the preferred Mulbarton site South of Rectory Lane (SN2038). The Rectory Lane site is located south of the village which is not in accordance with the objectives of the Mulbarton Neighbourhood Plan which aims to refocus new development around the Common and away from the southern end of the village, precisely to limit the expansion of large scale estate development further in this direction.

The South Norfolk Site Assessment booklet for the Rectory Road site notes that the Highway Authority have raised serious concerns about access from Rectory Road and have scored the site as red. Access from Bluebell Road for up to 25 should however be possible. This site also extends existing estate development further into the countryside and will be very visible from surrounding roads, albeit against a backdrop of existing estate development. In comparison, Land to the north of Mulbarton is much better contained.

The site plan (**Appendix 1**) also shows the provision of new and reinforced boundary landscaping, footway improvements and open space provision and vehicular access from Norwich Road. The site is well located close to existing local service provision and on a safe pedestrian route to the local primary school. The assessment of the site under the previous planning application 2018/0872 confirmed that there are no technical constraints which would preclude development on this site. The proposed amended allocation site will offer the following:

- A single point of access onto Norwich Road previously confirmed appropriate in the location shown. This was the agreed location of the secondary access point for the larger residential scheme considered under the planning application. Suitable visibility splays can be provided here.
- Suitable pedestrian links to services and facilities within the village can be provided both via improvements to existing footways along Norwich Road and via the existing public right of way from the southern corner of the site to the Common.
- There were no previous objections in relation to drainage or flooding from either the Environment Agency or Lead Local Flood Authority. A similar approach to drainage would be taken for the allocation site with a drainage pond located in the field to the north of the site where the land is lower and suitable infiltration exists.
- A new hedgerow is proposed to the north of the access road which would screen views of the road on the approach into the village. If considered necessary, any housing or other built development could be kept in line with the northernmost point of the St Omers Close development to further protect views of the site from the north.
- The reduction in the size of the site from the previous planning application will also ensure that the extent that the new eastern development edge protrudes to the north of the village will be halved and extend no further north than the existing St Omer Close development. This will significantly reduce the impact of estate scale development on the village.
- The reinforcement of the eastern boundary hedge to provide a minimum 2 metre width hedge along the eastern edge will minimise any impact on views from the public right of ways to the east of the site. This can be supplemented by density transition from low along site edges to higher within central part of the site and the location of bungalows where appropriate along the edges.
- The indicative masterplan contains significant public open space provision. The inclusion of a green space bordering the Church yard responds to Historic England's request for such.
- There are no archaeology, utility services or ecology constraints that preclude development of the site, as confirmed through the previous planning application process.
- The provision of new residential development with easy and safe pedestrian access to the local Primary School will support local services to the benefit of the vitality of the rural area and in direct accordance with National Planning Policy Guidance.

- The provision of a care home responds directly to the identified growing need for elderly care provision within this part of Norfolk.
- Provision of a site for a doctors' surgery enables future flexibility for provision to meet the needs of the whole village.
- The provision of a mix of housing types and tenures, including policy compliant affordable homes will assist in addressing local, rural housing needs.
- The site is of an appropriate scale to be attractive to small to 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.
- The site has received good interest from local house builders, who offer their support to these representations.
- The site also has the benefit of being located within the Cambridge-Norwich Hi-Tech corridor where it can provide homes to support the creation of hi-tech jobs in line with the GNLP proposed vision for growth.

I trust that the above and enclosed is of assistance to you and your colleagues in concluding the suitability and deliverability of the proposed allocation site.

Yours faithfully



**Beccy Rejek**  
Associate Director, MRTPI,

**Appendix 1 – Site Plan**