

July 2021

QUESTIONS 87 & 89 – EXTENT OF SETTLEMENT LIMIT & PROPOSED ALLOCATION SN2038, LAND EAST OF BLUEBELL ROAD & NORTH OF THE ROSARY, MULBARTON

Land East of Bluebell Road, Mulbarton

Background

- 1. Hopkins Homes are providing this consultation response in reply to the Regulation 18 Consultation of the emerging South Norfolk Village Clusters Housing Allocations Document by the requested site submission deadline of 2nd August 2021.
- 2. Hopkins Homes Ltd is the largest independent house building company in East Anglia with a reputation for delivering well designed, high quality residential and mixed-use development harmonising with its local context. In the past decade the company has succeeded in delivering sustainable developments which improve neighbourhoods, improve local infrastructure and add to local distinctiveness throughout the South Norfolk and wider Greater Norwich area.
- 3. Hopkins Homes has an interest in the land as identified on the attached plan. This site was submitted to the 'Call for Sites' consultation held in early 2020 with the representations supported by a Concept Masterplan which demonstrated how the site could deliver a residentially-led development of up to 325 dwellings, together with up to 4.25 Ha of associated public open space.
- 4. Part of the site has subsequently been identified in the Emerging Plan as a preferred allocation, for 35 dwellings (Ref: SN2038).
- 5. Whilst we support the proposed allocation and welcome the fact the Council has recognised that this site is suitable for development, we nevertheless object to the limited level of growth in Mulbarton, given that this is a sustainable location where additional development should be located.
- 6. Hopkins Homes continues to submit that Mulbarton is suitable location to accommodate up to 325 dwellings, however, in order to present various options to the Council, these representations are also supported by a Concept Masterplan which identifies an alternative site area that could accommodate up to 200 dwellings, together with up to 2.35Ha of associated public open space.
- 7. The extent of the site area proposed for up to 200 dwellings is shown below:



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Proposed Level of Growth in Mulbarton

- 8. Mulbarton is wholly sustainable as a location for new development. It has a population in excess of 3,500 residents and approaching 1,500 dwellings. The village is well served by local education, sports and community facilities with good transport links to the nearby city of Norwich, approximately 7 miles to the north-east. The current local plan, together with the adopted Mulbarton Neighbourhood Plan, would see only 20 or so further homes added to the housing stock over a 15-year period, a paltry figure which must be regarded as disproportionately low in the context of the growth aspirations of South Norfolk and the wider Greater Norwich area.
- 9. In a similar vein, we therefore consider that the proposed strategy of this Village Clusters Plan is unsound, on the basis that it does not contribute towards the achievement of sustainable development, nor is it positively prepared in a way which is aspirational but deliverable.
- 10. The NPPF 2021 makes it clear at Paragraph 71 that 'Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services'.



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- 11. The current strategy of this Clusters Plan to identify sites to accommodate at least 1200 dwellings is derived and driven by that of the over-arching Greater Norwich Local Plan, which itself is yet to be Examined, hence is highly likely to be subject to further change. As such, we have serious concerns regarding the lack of transparency or evidence-based assessment as to how the levels of growth proposed to be apportioned to respective settlement cluster were made. To this end, we would strongly recommend that further evidence is provided as to why each settlement cluster has been apportioned the number of dwellings currently proposed, and not more or less.
- 12. In respect of Mulbarton, whilst we are clearly supportive of further growth, we object to the very limited level currently being proposed, hence are unclear as to why only 35 dwellings are being proposed for allocation? Mulbarton has been previously classified as a 'Service Village' but it more readily functions as a 'Key Service Centre' village, whereby day to day services and facilities are close at hand. Development here would be in tune with the Core Planning Principles of the NPPF.
- 13. The Sustainability Appraisal which accompanies the Draft Plan appears to have been constrained by the desire to seek allocations of 50 dwellings or less, such that there appears no consideration of alternative options to deliver the minimum requirement of 1200 dwellings a requirement which in itself may increase depending upon the outcome of the GNLP Examination. This appears to be a major flaw in the overall assessment of the most sustainable way to deliver the required minimum levels of growth.
- 14. There is also the clear risk that in only identifying sites of between 15 and 50 dwellings, the Plan will fail to address the defined key objectives of meeting housing needs and a mix of housetypes, including affordable housing, together with the associated infrastructure requirements. The viability and deliverability of such small sites is highly questionable, such that greater flexibility in site size is required. Larger sites in the proportionately larger villages such as Mulbarton are therefore required to provide just such flexibility and ensure that the key Plan objectives can be met.
- 15. The growth distribution strategy of the Plan should be moved further towards villages to facilitate growth, in the short to medium term, at places such as Mulbarton, where community infrastructure, services and facilities are already in place and can be readily improved. This would assist with removing the risk of sustained periods of lack of housing supply, as has persisted in recent years throughout South Norfolk and the wider Greater Norwich Plan area.



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16. The allocation of the larger Bluebell Road site, as part of the wider development strategy, would go some way to providing certainty that an appropriate and deliverable housing location, in the control of a housing developer, can come forward.

Land East of Bluebell Road and North of the Rosary, Mulbarton

- 17. The site is confirmed as being deliverable in that it is available now, in a suitable location and achievable with a realistic prospect of development being delivered well within the next 5 years. The relatively unconstrained nature of the overall site provides the opportunity for flexible development in smaller phases, from south to north, if ultimately deemed desired or required.
- 18. Whilst planning application timeframes would need to be further discussed with the District Council having regard to the Local Plan progress, theoretically, Hopkins Homes Ltd could progress an application on this site without delay, such that it could assist housing delivery within the next five years (with a projected delivery of 45 homes per full year).
- 19. The site is bordered by existing residential development to the north, south and west, whilst is largely enclosed by strong existing boundary hedging and trees, enabling it to sit comfortably within its surroundings, with little by way of wider visual impact. The proposed development of the site shown on the concept plan would enable this limited visual impact to be maintained.
- 20. As detailed, whilst we support the allocation of Site SN2038, we object to the level of growth being apportioned to the village over the plan period and therefore recommend that the allocation boundary should be increased to that shown on the submitted site plan. The provision of up to 200 dwellings would provide additional benefits to the village including a greater number of affordable dwellings; significant areas of new public open space; a diverse mix of house types and opportunities for biodiversity enhancements, together with proportionate financial obligations.
- 21. This development could be delivered in phases, with phase one comprising 135 dwellings on 4.5ha of land to the south of the existing public right of way, with a further 65 dwellings on upon a site area of approximately 2Ha to the north, as shown below.



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- 22. Alternatively, the site could be developed comprehensively as shown in the Concept Masterplan as submitted to the 'Call for Sites' consultation (and enclosed with this submission for reference).
- 23. Submitted as part of these representations is a supporting statement prepared by Ingent Consulting Engineers which confirms that Bluebell Road is a suitable road/access to accommodate up-to 325 dwellings.
- 24. In relation to biodiversity impacts, Hopkins Homes would submit that the development could be beneficial in that the biodiversity of the site is low and relatively benign at present. The new development would add planting and native landscaping which would aid biodiversity objectives, whilst an initial Ecological Survey of the site has confirmed that no overriding ecological constraints are apparent which would impact upon the proposed development of the site (this related to the whole site under Hopkins' control).
- 25. Similarly, an initial Archaeological Assessment has concluded that there is a very low probability of any significant archaeological assets within the ground beneath the site, whilst no acknowledged heritage assets are present on or adjacent to the site.



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- 26. The site is within a walking and cycling distance of key services, with the village benefitting from a Primary School, Village Hall, Public House and convenience store, with the city of Norwich only seven miles from the site.
- 27. There are no drainage or physical infrastructure issues which cannot be overcome by standard engineering solutions, thus the site is demonstrably deliverable in a sustainable and technically appropriate manner.
- 28. In conclusion, Hopkins Homes Ltd therefore requests that the level of growth in Mulbarton is increased to at least 200 and in turn, the residential allocation boundary is amended to accord with the site plan below, with the settlement limit for the village extended to likewise encompass the totality of this site.

