**Reps: Greater Norwich Local Plan - Site GNLP0252: Land at Yarmouth Road, Blofield**

I have recently seen the papers published on the Greater Norwich Local Plan website for the meeting on 06 January 2020 (extract attached). These papers are in respect of the proposed local plan site allocations in the key service centre of Blofield.

There is clearly an error in the Notes of the section titled *"Existing allocation to be carried forward"* which states:

*"Notes*
*BLO1: The site was allocated in 2016 as part of the previous local plan but has not yet been developed. The principle of development on the site has already been accepted and it is expected that development will take place within the time-period of the new local plan up to 2038. The site is likely to accommodate at least 250 homes reflecting planning permission 20161066 which Planning Committee have resolved to grant outline approval subject to the satisfactory completion of a Section 106 Agreement and appropriate conditions. More may be accommodated, subject to an acceptable design and layout etc. being achieved. When BLO1 is completed it will be incorporated into the settlement limit."*

The planning reference and description refers to a site in Drayton, and not Blofield. The correct reference is 2016/0488 and is for 163 dwellings which are currently under construction. As such, it cannot be an *"Existing allocation to be carried forward"*. The number of dwellings currently being provided is correctly identified in calculations but again incorrectly listed as *"Carried forward allocations"*.

In particular, I note the comments and assessment made in relation to the land at Yarmouth Road, Blofield (ref. GNLP0252) in the emerging draft Local Plan, which has been proposed for residential development (undefined dwellings). This site is assessed as a "Unreasonable" in the proposed Draft Plan, stating:

*"This site is not considered to be suitable for allocation. Little additional growth is proposed in Blofield due to substantial existing commitment and concerns about capacity of the A47 roundabout..."*

It is noted that another site is identified as a proposed allocation (refs. GNLP2161), with text stating:

*"GNLP2161: Residential development in Blofield is limited due to the level of existing commitment and capacity issues with the A47 roundabout however this site is considered to be of a suitable size to allocate. The allocation is subject to provision of frontage footway and possible 'de-engineering' of the former trunk road. The promoter would need to demonstrate availability of appropriate visibility splay. Consideration will need to be given to how the site relates to the existing delivery and service yard of Norwich Camping and Leisure."*

It is apparent that these assessments – both the reason for choosing GNLP2161 instead of the GNLP0252 site, and for not proposing the allocation of the latter - is based on assumptions not evidence.

The assessment accompanying the proposed allocation of GNLP2161 states that:

- *"this site is likely to accommodate at least 15 homes, 33% of which will be affordable. More homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints."*
- *"The design and layout of the scheme must mitigate amenity impacts relating to the neighbouring business to the east, addressing in particular access to the service yard"*
- *"The allocation is subject to provision of frontage footway and possible 'de-engineering' of the former trunk road. The promoter would need to demonstrate availability of appropriate visibility splay"*
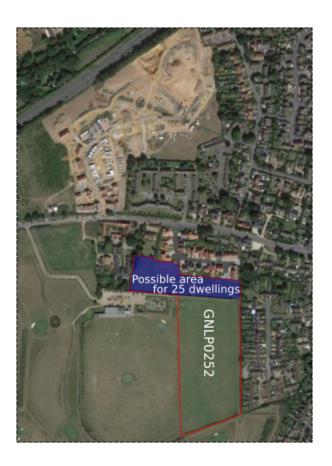
It is clear from this that there are significant uncertainties in both scale of development, deliverability, and viability.

In contrast, GNLP0252 is both demonstrably viable and capable of delivering new homes quickly.

The area north of GNLP0252 (shown as 20141710 BLO2 on the accompanying map – Blofield GNLP) is a recent development. That development is now complete and has provided 30 dwellings (20 open market and 10 affordable) all of which are now occupied. The rapid construction and sale of this site (Newstead Gardens) shows both the deliverability of development, and the attractiveness and demand for new homes in this location.

The development of 20141710 BLO2 was carefully designed and constructed to provide both access and infrastructure to the boundary of GNLP0252. Consequently, there are no access or infrastructure constraints to the rapid delivery of new homes on GNLP0252.

If it felt that an appropriate quantum of development for Blofield is "*at least 15 homes*" (text from GNLP2161) then the northern section of GNLP0252 within the existing hedge boundary would accommodate up to 25 dwellings with minimal visual impact and no intrusion into the countryside:

These new homes would be located within an existing residential area and (unlike GNLP2161) would not have their residential amenity compromised by an adjacent busy commercial use or commercial traffic accessing an adjacent service yard.

Contrary to the above GNLP statements, there are no significant highways constraints (based on current highways information) regarding capacity of the A47 roundabout. Transport assessments have been carried out on behalf of multiple current larger developments (100+ dwellings) in the area and no required works have been put forward since the last works carried out by Persimmon Homes in conjunction with their completed development of 150 dwellings on Cucumber Lane.

The proposal for (up to) 25 dwellings will have modest transport impacts and this is acknowledged in the GNLP2161 allocation for "*at least 15*". The proposed development will not have any significant adverse impact upon the satisfactory functioning or safety of the highway network.

In light of the above, it is clear that GNLP0252 represents a better located site, has existing infrastructure and access already in place, and will therefore provide much needed new homes faster and with more certainty when compared to GNLP2161. I would therefore request that GNLP0252 is identified as a preferred allocation for Blofield.