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Date: 11.02.2022

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

Our ref: 2294/Hearing Statement

Dear Sir / Madam,

Re: Re: Greater Norwich Local Plan (GNLP), Hearing Statement in respect of Matter 10, Housing and mixed use allocations. Draft housing allocation GNLP0312: Land to the east of Beccles Road, Loddon

Introduction and Summary

This Hearing Statement is submitted in response to Matter 10, Housing and mixed use allocations - new sites without planning permission that are allocated for less than 500 dwellings, of the Inspectors Matters Issues and Questions (March 2022 Sessions).

This Statement relates specifically to site (o), Land to the east of Beccles Road, Loddon (Ref GNLP0312) (see **Appendix 1** for site area). Lanpro act on behalf of Hopkins Homes who are the sole promoters of the draft residential allocation site.

This Hearing Statement provides an update to representations made by Lanpro Services on behalf of Hopkins Homes to the Regulation 19 draft GNLP consultation and earlier stages of the GNLP process and provides additional information on the allocation's deliverability and overall 'soundness'. Where appropriate this information has been presented in direct response to the 5 questions posed by the Inspector in relation to Matter 10.

Hopkins Homes confirm their view that the draft GNLP is 'sound'; support the proposed draft allocation; and are committed to its delivery. The current policy wording relating to GNLP0312 seeks a dual access solution to the site. Previous representations to the GNLP process made by Hopkins Homes, asserted that the policy wording relating to the allocation should be more flexible (on the basis that a single access and emergency access solution could be appropriate). Notwithstanding, Hopkins Homes have since submitted a planning application to South Norfolk District Council (November 2021), for the site's residential development of 180 dwellings, which proposes a dual access in accordance with the proposed policy wording. A decision on the application is pending.

The Representations

Matter 10, Question 1. Is the allocation justified and is it supported by the evidence?

and

Matter 10, Question 2. Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and where necessary, can appropriate mitigation be achieved?

The site has been promoted at each consultation stage of the GNLP production process. At each stage of the GNLP process, appropriate evidence has been put forward by Hopkins Homes to demonstrate the site's environmental suitability, deliverability and availability. Hopkins Homes has presented evidence to the following consultation stages which has been assessed by the Council and used to inform the site's draft allocation:

- The 'Call for Sites' stage of the GNLP in 2016;
- The subject of a further submission in October 2019;
- The Stage C Regulation 18 consultation in March 2020. Hopkins Homes supported the inclusion of the draft allocation, but sought a change to the policy wording to allow flexibility at the planning application stage over the final access solution and to demonstrate the appropriateness of a single point of access to the site; and
- Regulation 19 consultation in February 2021. Hopkins Homes continued to support the draft allocation and reiterated the appropriateness of a single access point for the site. The allocation's deliverability was confirmed through the provision of a Statement of Common Ground from Hopkins Homes and by summarising the pre-application advice received from South Norfolk District Council and statutory consultees on a draft masterplan.

Matter 10, Question 3. Has the availability, viability and deliverability of the site been robustly assessed?

The availability, viability and deliverability of the site for allocation has been evidenced by Hopkins Homes at each stage of the GNLP consultation process and most lately through the submission of a Statement of Common Ground to the Greater Norwich Growth Board on 10 November 2021.

The availability, viability and deliverability of the site is further evidenced by the recent submission of a planning application(s) by Hopkins Homes for the site's residential development.

Given the positive pre-application discussions had with officers and consultees from November 2020 to March 2021, Hopkins Homes took the decision to submit a planning application in October 2021 following the submission of the GNLP to the Secretary of State for examination. .

The application (LPA reference: 2021/2437) has been submitted in hybrid form and relates to 171 dwellings (details submitted in full), and 9 self-build dwellings (details submitted in outline) (as required by draft Policy 5, Homes of the draft GNLP) together with access, landscaping and associated infrastructure. The proposed development is shown as being served by two points of access following the request of the Highway Authority at the pre-application stage. (A duplicate application (LPA reference: 2021/2522) has been submitted alongside the original to allow Hopkins Homes flexibility in the planning process).

The applications have been validated and consultation responses have to date been received from:

- Children's Services – No objection in principle: confirm school and library facilities to be delivered through Community Infrastructure Levy (CIL) payments.
- Ecology – No objection in principle: additional information is requested on proposed ecological mitigation much of which can be provided in response to an appropriately worded planning condition.

- Heritage and Design – No objection in principle. Detailed matters of layout and design to be addressed.
- Housing Enabling Officer – No objection in principle: consultee confirms development provides an excellent mix of property types to meet a wide range of housing need. In particular it addresses the current shortage of 3 bedroom houses and bungalows for rent. 5% of houses are provided as custom build in line with the draft GNLP requirement.
- Local Lead Flood Authority – No objection in principle; holding objection provided awaiting receipt of additional information on the design of the proposed drainage features. This has been provided and awaiting further response.
- Town Council – Recognise that the site is allocated within the draft GNLP. Concerns expressed on detailed design matters. An “equitable solution” is considered possible by the Town Council.
- Anglian Water – No objection in principle: confirm capacity within the local sewer network to accommodate the proposed development.
- CPRE – Object on the basis that the draft allocation is yet to be formally adopted.
- Highways – No objection in principle: amendments requested to internal road layout and parking arrangements which are being considered by the applicant.
- Designing out Crime - No objection in principle. Design amendments recommended.
- Historic Environment Officer – No objection in principle: additional archaeological survey information is requested.

In summary, there have been no matters raised by consultees which draw into question the suitability of the site for 180 dwellings nor the ability of the application proposals to deliver the requirements of the draft site allocation. All queries raised by consultees relate to detailed matters of layout and design.

Matter 10, Question 4. Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)

Hopkins Homes confirm in their Statement of Common Ground that assuming 6-9 months for the determination of the planning application, alongside a further 6 months for construction to commence, housing could potentially be delivered on site in 2023. It is estimated that the scheme would deliver 50 units per annum, enabling completion in 2026/27. These figures are accurately represented in Document 3.2C.

Summary of Representations

This Hearing Statement, alongside representations made by Hopkins Homes to earlier stages of the GNLP process, confirm that the proposed allocation is available, developable and deliverable during the plan period.

The draft allocation is positively prepared, justified, effective and consistent in its ambitions with national planning policy and is therefore ‘sound’.

Prepared by Ian Douglass, Director, Lanpro