

**Representation in respect of an Application by Orsted Hornsea
Project Three (UK) Ltd for an Order Granting Development Consent
for the Hornsea Project Three Offshore Wind Farm.**

Response by Simon Back

Planning Inspectorate Reference: EN010080

Prepared by: Jonathan Rush MRICS

For and on behalf of Brown & Co. as duly appointed agents for Simon Back

Date: November 2018.

1.0 Introduction

- 1.1 This statement is our response, submitted on behalf of our client, Simon Back, to the underground cable route proposed as part of the Hornsea Project Three Offshore Wind Farm. Simon Back is the owner of land to the North East of Hethersett in Norfolk.
- 1.2 It is our belief that the proposed route for the underground cable, and the associated protective zone, will frustrate intended development of our client's property. The following gives background information on intended proposals for this part of our client's land.

2.0 Background

Existing Planning Context

- 2.1 The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk (adopted in March 2011 with amendments adopted January 2014) is the key planning policy document for the Greater Norwich area. It forms part of the Local Plans for the districts of Broadland, Norwich and South Norfolk setting out the broad vision for the growth of the area and containing strategic policies for the period 2008 – 2026
- 2.2 The JCS identifies Hethersett as a strategic growth location, allocating at least 1,000 homes at Hethersett. As Hethersett is located within the Norwich Policy Area (NPA), it was also eligible to accommodate a share of the 1,800 'floating' numbers to be provided for through additional smaller sites within the South Norfolk NPA. These 'floating' numbers were not allocated to any particular location but spread across the NPA with all NPA settlements eligible for an increase in numbers above those allocated within the JCS
- 2.3 The South Norfolk Site Specific Allocations & Policies Document (adopted in October 2015) is part of the South Norfolk Local Plan. It designates areas of land for particular uses, most notably land to deliver housing for the period up to 2026. It allocates 1,354 new homes within Hethersett. These comprise the HET1 allocation for 1,196 homes to the north of Hethersett reflecting the outline planning permission granted in July 2013 (ref. 2011/1804/O), together with an allocation to the north-west that has already been constructed and largely completed by Avant Homes (151 homes permitted by planning permission ref. 2015/0635
- 2.4 It is of note that earlier drafts of the JCS proposed 4,000 new homes at Hethersett reflecting that it is a highly sustainable location and providing a clear indication of its ability to accommodate further growth beyond the current allocation sites.

The Emerging Local Plan

- 2.5 Broadland District Council, Norwich City Council and South Norfolk Council are working together with Norfolk County Council to prepare the Greater Norwich Local Plan (GNLP), which will build on the established joint working arrangements for Greater Norwich, which have delivered the current JCS
 - 2.6 The GNLP will include strategic planning policies to guide future development within Norwich, Broadland and South Norfolk for the period to 2036. The draft strategy (as set out in the Growth Options Document, January 2018) sets out a requirement for 42,887 new homes during the period from 2017 to 2036, of which 7,200 require new sites to be allocated
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- 2.7 In order to meet the housing requirement, the Growth Options Document sets out 6 strategic growth options, all of which would see additional growth directed to the South West NPA.
 - 2.8 In this context Hethersett remains a highly sustainable location for further development within the emerging GNLP. It benefits from being in close proximity to Norwich with excellent road links from the A11 and A47, together with a park and ride site adjoining Hethersett at Thickthorn
 - 2.9 Hethersett is also extremely well located in relation to the University of East Anglia (UEA), Norfolk and Norwich University Hospital (NNUH) and high-tech jobs at Norwich Research Park (NRP) with a new dedicated cycle link providing easy access from Hethersett
 - 2.10 Hethersett benefits from a good range of local shops and services and the current development will see the provision of a new Primary School and expansion of the High School
 - 2.11 Under the current emerging GNLP, the South West growth location, which includes Hethersett will need to accommodate up to 1,500 new homes for the period to 2036. The evidence base confirms that of the three settlements that make up the South West growth location, the other two (Cringleford and Little Melton) have limited scope for growth and therefore the majority of growth will be at Hethersett.

Land at Hethersett

- 2.12 Land to the east and south-west of Hethersett are constrained for development by strategic gaps providing separation from Cringleford and Wymondham respectively. In addition, land to the south is also constrained by heritage considerations as well as the Cringleford strategic gap to the south-east. Accordingly, the land to the north and west of Hethersett being promoted for a consortium of landowners, of which our client is a member, as the logical location for development to take place to accommodate up to 1,500 homes.
 - 2.13 The GNLP Site Proposals document published in January 2018 confirms the suitability of Hethersett for significant further growth. It emphasises that Hethersett is a major growth location and that it has a wide range of services with good access to the A47, N&N/NRP and Wymondham, extending the number of services accessible within a short distance.
 - 2.14 The eminent sustainability of Hethersett combined with its existing constraints (south-west, south and south-east) mean that it is highly likely that land to the north and west of Hethersett will come forward for development, either through an allocation within the GNLP or through an early planning application on the basis of the 5 year housing land supply position within the NPA.
 - 2.15 **Impact of the Proposed Cable Route for land north and west of Hethersett**
 - 2.16 The current Orsted cable route as shown on drawing no. 088/007 would result in approximately 9.8 hectares of residential development land being sterilised. At a typical density of 30 dwelling per hectare this would result in the loss of approximately 294 dwellings.
 - 2.17 Drawing no. 0088/008 shows a proposed alternative cable route alignment that would avoid the proposed residential development land to the south of Little Melton Road and minimise the loss of residential development land to the east of Burnthouse Lane. The
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proposed alternative cable route, would result in 1.86 hectares of proposed residential development land being sterilised, with a resultant loss of 55 dwellings at an assumed density of 30 dwelling per hectare

- 2.18 The amendments to the proposed cable route as shown on drawing no. 0088/008 would therefore result in significantly less residential development land being sterilised than the currently proposed route.

3.0 Conclusion

- 3.1 It is our client's belief that the Orsted proposals fail to consider the development proposals that are intended for this part of Greater Norwich. We believe that the cable route will potentially sterilise important development areas and compromise proposed layouts.
- 3.2 Our client respectfully requests that the points contained in this statement are fully considered within the examination process. Our intention is to submit a full written representation in due course and, if required, request that we can make oral representations if necessary.