

GNLP Regulation 18 Consultation Response

GNLP 0362 – LAND AT STURGEONS FARM OFF FARM CLOSE, LOUIE'S LANE, SHELFANGER ROAD

On behalf of G.N. Rackham and Sons Ltd (hereafter referred to as 'the Landowner'), we strongly recommend that site GNLP 0362 be allocated for residential led mixed use development, comprising up to approximately 413 dwellings, with associated open space and infrastructure. The site is considered to be entirely developable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2036.

In accordance with the National Planning Policy Framework's (NPPF) definition of 'developable', set out in footnote 12 to paragraph 47, the site represents a suitable location for housing development, and there is a reasonable prospect that the site is available and could be viably developed within 1-5 years. These points are addressed in further detail below, and within the supporting technical documentation that accompanies this Representation.

Assessment of Developability

Suitable

The site is located within the parish of Roydon but its southern and eastern boundaries immediately adjoin the current settlement boundary of Diss. For the purposes of the Greater Norwich Local Plan, the HELAA has classed the site as Diss, which is identified in Policy 13 of the Joint Core Strategy as a Main Town. The Adopted Joint Core Strategy identifies Main Towns as a key focus for sustainable development, and that these towns will accommodate additional housing, town centre uses, employment and associated services.

Diss has a good range of shops and services for its size, which includes two supermarkets and schooling up to and including a High School. The town also has the added benefit of existing employment opportunities off Vinces Road and Sawmills Road, together with the Mid Suffolk Business Park (formerly Eye Airfield) which is also located close by. These employment areas, together with good connections to Norwich and London via the mainline railway, provide substantial employment opportunities in the vicinity. In addition, and following the recent announcements by Greater Anglia regarding improvements to the line and trains, the railway provides for the potential to have high quality public transport links into Norwich. The good relationship to existing services and facilities in the Greater Norwich Area, make Diss an important location when considering future development opportunities.

The Greater Norwich Local Plan Regulation 18 Consultation document states that in identifying sites to accommodate the additional 7,200 homes required during the period up to 2036, consideration will be given to a range of settlements, including Main Towns (of which Diss is one). These settlements will need to accommodate a minimum level of growth of 1,000 units, irrespective of which of the six growth options is identified. On this basis, Diss is considered to be a location that is, in principle, a suitable location for additional development.

It is evident, therefore, that Diss and the immediate surrounds are a suitable location for further growth, based on current policy, and this site can accommodate a significant proportion of the growth planned for the Greater Norwich Local Plan Area in the period to 2036.

The site immediately adjoins the defined Settlement Boundary for Diss. As such, the proposed development will be immediately adjacent to the built up area of Diss and consequently represents a logical extension to the urban area, as shown on the indicative masterplan, that would create a clear and defensible boundary. As demonstrated below, the site can be developed without causing harm to the landscape setting of Diss.

In terms of more detailed site-specific considerations, the Housing and Employment Land Availability Assessment (HELAA) identifies the site as a suitable location for residential development. It confirms through a 'Green' rating, that there are no constraints or impacts anticipated in relation to accessibility to services, utilities infrastructure, contamination and ground stability, market attractiveness, townscapes, historic environment, open space and GI or compatibility with neighbouring uses. Issues which are given an 'Amber' rating, or specifically referred to within the text of the Site Proposals consultation document, include access, utilities capacity, flood risk, significant landscapes, biodiversity and geodiversity and transport and roads. The issues are addressed in more detail below.

Landscape

The site is situated on the northern edge of the Waveney Rural River Valley landscape character area. Key characteristics of the area include a relatively large-scale open valley landscape, arable and pastoral farming and diversity of land cover, together with discrete woodland blocks.

This representation is supported by a Landscape Visual Appraisal prepared by Wynne Williams Associates. The Appraisal establishes that both the landscape character impact and the visual impact of the site could be mitigated by a carefully considered landscape scheme combined with a sensitive layout for the development including buffer planting around and within the site. Existing landscape features will be retained, particularly hedgerows and trees where appropriate.

The site's location on the northern edge of Diss would create a continuous built form along Shelfanger Road to the existing waste recycling centre. The Centre has degraded the landscape character of the immediate area to some extent, whilst the visual sphere of influence is relatively tight with no views from the rural open landscape to the north. Most impacted views come from the adjacent Shelfanger Road and residential properties that adjoin the site.

The Landscape Visual Appraisal concludes that development in this location is capable of ensuring that the important elements of the landscape structure of the area are maintained, and the built development will not erode the previously identified landscape characteristics.

Biodiversity and Geodiversity

The HELAA identifies several nearby County Wildlife Sites, a watercourse and a small copse on the site which would require mitigation and protection. Therefore, an Ecological Appraisal has been undertaken by Hopkins Ecology in support of this Representation. This identified a number of phase 1 habitats which included arable, improved grassland, hedgerows, an ornamental hedge, scrub, pond and wet and dry ditches. The only on-site habitat of Principal Importance is Hedgerow, with 2 other habitats immediately adjoining the site – namely lowland deciduous woodland and a small traditional orchard.

The Appraisal also confirms that there is the potential for two protected species issues with regards to great crested newts and reptiles, following an initial review and site walkover. Follow up surveys would be required as part of any planning application, but mitigation measures both on and off site could be incorporated into the scheme if protected species are discovered, for example greenspaces around the potential locations shown.

Mitigation measures for the loss of semi-natural habitat will be low and soft landscaping is anticipated to be the most appropriate. Looking at it from a strategic viewpoint, such landscaping would offer new habitat area that could be relevant to local green infrastructure proposals, the landscape conservation projects of the Claylands Living Landscape and the Waveney B-Line for pollinating insects.

Impacts on the designated sites identified in the HELAA are considered to be negligible due to the distances involved and the fact that the site is located downstream of the river catchment area.

The Appraisal concludes that the majority of species can be mitigated and with the necessary and appropriate landscaping and scheme design, the site has the potential to deliver net ecological enhancement.

Access, Transport and Roads

The HELAA identifies the potential for additional traffic pressures along the A1066 through Diss, particularly in combination with nearby sites. In addition, the HELAA assumed that a highways access onto Shelfanger Road is likely to be achievable.

The accompanying assessment has concluded that vehicular access to the site could be achieved principally from Shelfanger Road, with a secondary access from the adjacent existing residential area, Farm Close off Louie's Lane. This is demonstrated on both the indicative masterplan submitted as part of this representation and the detailed highway plans prepared by Richard Jackson. These accesses would provide safe, effective, vehicular access and egress in accordance with current highway design standards.

A Transport Note prepared by Richard Jackson Engineering Consultants in support of this Representation demonstrates that development of the site would not have any severe impact on junctions located to the south of the site (towards Diss). Likely traffic movements from the proposed site have been assessed including looking at the influence of the traffic from the site on the centre of Diss. It is likely that if 50% of the traffic generation going south and east is considered going through the town centre, then this vehicular trip generation equals to the equivalent of almost one per minute which is relatively low and also a likely overestimate. In addition, consideration has been given to the Victoria Road/Vinces Road Junction Improvement Feasibility Study, published in April 2015. This concluded that an improvement to the junction by enlarging the mini roundabout will help to reduce the existing traffic congestion. It is understood that this scheme is now progressing and the necessary funding is available to provide this improvement for all road users through Diss. In summary, the following points are considered to be satisfactory:

- Site Access – satisfactory access with necessary visibility can be achieved.
- Local Junction Assessment – no offsite junction upgrades are required. Offsite highway improvements are being provided in Diss by Norfolk County Council.
- Accessibility to Services – high proportion of daily and weekly services can be accessed by pedestrian, cyclists or public transport.
- Pedestrian Links – good site routes to schools and facilities (upon additional footway improvements)
- Cycle Facilities – no specific route but 20/30mph speed limit is present between the site and local facilities.
- Public Transport – current public transport provision does meet Norfolk County Council targets.

Surface Water Drainage

The HELAA identifies that there is a small watercourse that runs along the northern boundary of the site with small areas at risk of the 1:100 year surface water flooding. The entire site is within Flood Zone 1,

however, a suitable surface water drainage strategy, which amongst other things would assess if infiltration devices could be utilised on the site, would be prepared as part of any planning application.

An initial Flood Risk Assessment has been prepared by Richard Jackson Engineering Consultants which accompanies this representation which concludes that further intrusive investigations are required in order to determine if infiltration devices could be utilised on the site. The discharge rate to the watercourse on the northern boundary will have to be agreed with the LLFA but it is concluded that with above ground storage, this strategy would be in accordance with both National and Local planning policy. In addition, treating the water for quality and quantity on site will not create a detrimental effect downstream of the site. The final scheme will also set aside sufficient land for accommodating swales, ponds and/or attenuation basins, to allow water to drain to the watercourse. In conclusion, the site is suitable for residential development and surface water drainage can be adequately managed in accordance with the relevant planning policy.

Foul Sewage and Utilities Assessment

A foul sewage and utilities assessment has been prepared by Richard Jackson Engineering Consultants to support this representation. The report assesses available existing utilities and proposed utilities which will be required on site. The HELAA identified a potential requirement for enhancements to the sewerage and water supply network including the potential for improvements to the closest Water Recycling Centre. Through a pre-planning assessment report, Anglian Water have confirmed that there is sufficient capacity in the Diss Wastewater Recycling Centre to take the flows from the site. In addition, Anglian Water have confirmed a connection can be made to the existing 300mm main in Louie's Lane, without the need for offsite reinforcement.

The Assessment also identifies the need for overhead electric cables which currently cross the site to be buried underground.

In summary, the report concludes that the estimated costs associated with required utilities connections which are all readily available to the site are fair for the number of dwellings proposed. They will be factored into any viability assessment as the site progresses.

Summary

In conclusion, it is clear from the above that the site is entirely suitable for residential led mixed use and associated development. The technical evidence submitted alongside this Representation, demonstrates that there are no constraints to the delivery of the site.

Available

The site is currently in agricultural use and is under the sole ownership of the landowner. There is a short term agricultural tenancy which has break clauses inserted. There are no known third party ownerships, access rights or restrictive covenants. The site could be available for development in 1-5 years.

Achievable

Based on the suitability assessment above, there are no site-specific constraints which could threaten the delivery of residential development on the site. Therefore, residential development on the site is deemed to be entirely achievable.

Viable

Development of the site for residential purposes is considered viable, taking into consideration the various policy requirements in relation to matters such as affordable housing provision and CIL contributions, as well as potential abnormal costs, which include the provision of landscaping and infrastructure upgrades/reinforcement.

Summary

As outlined above, the site is suitable, available and viable, and is therefore developable. Development in this location would represent sustainable development, as defined within the National Planning Policy Framework. Diss is already acknowledged as a highly sustainable location, and a preferred location for growth, and the foregoing text demonstrates that the site is a suitable location for further development in all respects and help deliver the objectives for Diss.

Economically, the site represents the right land in the right place at the right time. Residential development in this location would help support the planned long-term economic growth of the Greater Norwich Area, providing high-quality and desirable homes within easy reach of key employment areas in the town and further afield. In addition, the development will generate substantial construction related jobs during the construction process.

Socially, the scale of development envisaged is such that it will enable the creation of a strong, vibrant and healthy community, with easy access to existing and planned local services and facilities, as well as enhanced Green Infrastructure. A wide mix of dwelling types, sizes and tenures will be provided to meet local needs, and CIL payments will ensure the provision of the necessary health and cultural facilities. The site is located immediately adjacent to the existing built up area of Diss, which should assist in achieving social integration between the existing and new residents.

Environmentally, the site is located close to employment opportunities within Diss, and enjoys excellent access to a range of sustainable transport options providing easy access via the mainline railway, to the extensive array of facilities and services available within Norwich city centre.

On this basis, the site should be taken forward as an allocation, and is capable of making a significant contribution to the planned growth of the Greater Norwich Area in the period to 2036.