

GNLP Regulation 18 Consultation Response

GNLP0006 - Land to the north of Tuttlles Lane East

On behalf of Welbeck Strategic Land III Ltd, we strongly recommend that site GNLP0006 should be allocated for residential development, comprising approximately 1000 dwellings, with associated open space and infrastructure including a primary school, if required. The site is considered to be entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2036, as set out in the accompanying Vision and Delivery Document, which draws on technical evidence prepared in support of this Representation.

In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', set out in footnote 11 to paragraph 47, the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable.

These points are addressed in further detail below, and within the Vision and Delivery Document that accompanies this Representation.

Assessment of Deliverability

Suitable

The site is located on the northern edge of Wymondham, the largest Market Town in South Norfolk, and a settlement which is recognised in the Joint Core Strategy as highly sustainable, given its location on the strategically important A11 corridor, its good public transport links to Norwich, and its location on the Norwich to Cambridge railway line. Wymondham is identified in the Joint Core Strategy as a suitable location for large scale growth, and is allocated 2,200 new dwellings and 20ha of employment land in the period to 2026. Whilst it is acknowledged that there are a number of infrastructure constraints, specifically high school capacity and the A11/A47 Thickthorn junction, it is considered that Wymondham should remain a key focus for additional growth in the period to 2036. As one of the Main Towns, a proportion of the planned growth will need to be accommodated here, regardless of which Growth Option is ultimately selected by the GNLP.

It is understood that a scheme for highway improvements at the Thickthorn junction has been agreed with Highways England, and the Growth Options Consultation Document confirms that there are a number of potential options for high school expansion. The issue of high school capacity will need to be resolved by the County Council to facilitate further development within Wymondham.

The site is located adjacent to existing development, and represents a logical extension to the town. It does not encroach into the identified Strategic Gap between Wymondham and Hethersett, and is close to key services and facilities. Furthermore, its location at the northern edge of the town ensures that development here would have no impacts on the setting of the Grade I Listed, and nationally significant, Wymondham Abbey, which is identified as one of the key constraints to growth within Wymondham.

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, significant landscapes, townscapes, biodiversity and geodiversity, historic environment, open space and green infrastructure 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, are addressed in more detail below.

Access, Transport and Roads

A Site Transport Appraisal has been undertaken by AECOM in support of this Representation, and its conclusions are reflected in the Vision and Delivery Document and on the Masterplan. It is envisaged that 2 points of access would be taken from Tuttle Lane East, one of which would comprise a roundabout. There is excellent visibility along the site frontage, and these access points would fully comply with current guidance. It is therefore possible to provide safe access into the site, as confirmed within the AECOM report.

A key aim of the proposed development will be to reduce the current levels of reliance on the private car; the 2011 Census showed that 70% of journeys to work from Wymondham were by private car. This is expected to reduce significantly with the planned changes and improvements to the local transport network. Well served bus stops are located within reasonable walking distance of the site and frequent routes serving Wymondham and other local towns such as Watton, Dereham and Attleborough as well as excellent links to Norwich pass along the site frontage. The proposed site would be linked to the proposed extension of the Blue Pedalway linking Wymondham with Sprowston via Norwich city centre, and to Thickthorn Park and Ride from which bus services to Norwich are provided every 15 minutes. The development site is also within a reasonable cycling distance of Wymondham railway station.

In terms of the surrounding highway network, some upgrades may be required to cater for the additional traffic likely to be generated by the proposed development. Specifically, signalisation of the Tuttle Lane East roundabout may be required. Further afield, there is an existing Highways England improvement scheme planned for the A11/A47 Thickthorn interchange, which has been designed to cater for the planned growth to 2036.

It is clear, therefore, that neither Access nor Transport and Roads present any significant constraint to the delivery of the site.

Utilities Capacity

A Utilities Assessment has been prepared by AECOM, in support of this Representation. It confirms that all the key utilities are available in the locality (gas, electricity, potable water, telecoms and foul sewerage). In relation to capacity, it has not been possible in the timeframe of the current consultation to engage formally with the utilities providers, however, AECOM have undertaken a desktop review and have found nothing to suggest that there are any known capacity issues that would impact on the proposed development. Furthermore, given the scale of the proposed development, it is considered highly unlikely that there would be any capacity issues significant enough to prejudice its viability.

Flood Risk

A Drainage Note has been prepared by Cannon Consulting, which confirms that the whole site is located within Flood Zone 1 and is therefore not exposed to flooding from overtopping of a Main River or other significantly sized watercourse. In relation to surface water flooding, the majority of the site is at very low risk, but there are localised areas at higher risk associated within the watercourse to the east, and other 'hotspots' within the site. These risks are readily manageable through appropriate masterplanning, such as the inclusion of low impact flood routes along landscaped corridors. The Drainage Note confirms that

groundwater flooding is not a realistic threat, and sewer flooding is not a significant or unmanageable threat. There are, therefore, no flood risk related reasons why the site could not be delivered.

The drainage strategy for the site is likely to comprise attenuation and discharge to the local watercourse, given the likely underlying geology. Consequently, the Masterplan incorporates suitably sized attenuation basins.

As outlined above, the HELAA gives a 'Green' rating to all other potential impacts/constraints. Further technical evidence has been obtained on a number of these points, which confirms the HELAA conclusion, and feeds into the Masterplan and Vision and Delivery Document.

An Ecology Appraisal has been undertaken by Hopkins Ecology Ltd, which concludes that the site is typical of an intensive arable landscape, and whilst a number of species of conservation concern are likely to be present, any such species will be found in low numbers and the overall assemblages of species will be small. It is considered that the impacts on the majority of species can be mitigated via appropriate landscaping and scheme design, with the potential to deliver net ecological enhancement. A key enhancement could be the delivery of the green infrastructure corridors identified within the Wymondham AAP as part of scheme design and landscaping.

A Cultural Heritage Desk Based Assessment has been prepared by CgMs Heritage, which concludes that there are no heritage constraints identified which would preclude the promotion of the site through the Greater Norwich Local Plan. The Assessment has established that the archaeological interest identified at the study site could be secured by an implementation of a program of archaeological mitigation measures in advance of redevelopment.

In conclusion, therefore, it is clear from the above that the site is entirely suitable for residential and associated development. The Masterplan options contained within the Vision and Delivery Document demonstrate that the site could be developed to accommodate approximately 1000 dwellings at a density of 35dph, together with extensive open space and green infrastructure, and a primary school should this be necessary. The technical evidence submitted alongside this Representation, together with the Vision and Delivery document, demonstrates that there are no constraints to the delivery of the site.

Available

The site is currently in agricultural use, and the landowner has entered into a promotion agreement with Welbeck Strategic Land III Ltd. The site is available for development, and would be delivered in the plan period.

Viable

Development of the site for residential purposes is considered viable at this stage, 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 strategic landscaping, the potential requirement for a primary school, and infrastructure upgrades/reinforcement.

Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary.

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. Wymondham, as South Norfolk's largest Market Town, and situated on the A11 Tech Corridor as well as the Norwich-Cambridge railway line, is already acknowledged as a highly sustainable location, and a preferred location for growth, and the foregoing text demonstrates that this specific site is a suitable location for further development in all respects.

Economically, the site represents the right land in the right place at the right time. Residential development here in the plan period would support the expanding employment area at Hethel nearby, as well as employment growth within Norwich, providing high quality and desirable homes within easy reach of these key employment locations.

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 on-site provision of a primary school should this be necessary, and extensive 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 in close proximity to established communities in Wymondham, which should assist in achieving social integration between the existing and new residents.

Environmentally, the site is located close to a wide range of employment opportunities, and enjoys good access to a range of sustainable transport options providing easy access to the extensive array of facilities and services available within Norwich and further afield. Residents will be able to meet their day-to-day needs easily and without the need to use their car, assisting in reducing pollution and minimising the contribution to climate change.

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.