
Greater Norwich Local Plan to 2036 Regulation 18 Public Consultation

Representations on behalf of the Trustees of JM Greetham

Lands known as Parcels 1-5, Spooner Row, Wymondham

March 2018

**Greater Norwich Local Plan to 2036
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**Responses on behalf of the Trustees of JM Greetham No 2 Settlement
Lands known as Parcels 1-5, Spooner Row, Wymondham**

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1.0 EXECUTIVE SUMMARY

1.1 These representations are made on behalf of JM Greetham No 2 Settlement in respect of lands known as Sites 1-5, Spooner Row, Wymondham.

1.2 The five sites within Spooner Row (the 'Sites') collectively extend to an overall aggregate site area of 19.63ha and they have been previously submitted as potential residential development sites under the Call for Sites request in 2016.

1.3 The five Sites will:

- provide a coherent consolidation and sensitive extension to the otherwise fragmented settlement morphology of Spooner Row. This will include the provision of a structured network of public open spaces comprising parkland and children's play areas. It will also include the introduction of additional community infrastructure in the form of additional school land, allotments, additional public car parking, new footpath links and a retail unit to serve local village need;
- fully assimilate into and enhance the settlement form and function of Spooner Row, set within a robust landscape framework, sympathetic to the existing village and the local landscape character. The development of the Sites will not negatively impact upon the character and function of the village;
- comprise a highly attractive and well-designed modern living environment which respects the local vernacular, with convenient and safe access by foot to nearby community facilities such as the local primary school, village hall, proposed parkland, proposed children's play facilities and the proposed shop, as well as the church and local pub;
- improve safe and convenient access to the railway station, bus stops, the local primary school and local community facilities to the benefit of the wider village;
- enhance the ecological and biodiversity value of the village with structural landscaping and the formation of new habitats including ponds, woodland and wild meadow.

2.0 INTRODUCTION

2.1 These representations have been prepared by Barton Willmore on behalf of the Trustees of JM Greetham No 2 Settlement in respect of the Greater Norwich Local Plan to 2036 and in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The consultation comprises the following:

- Site Proposals consultation document (SPCD);
- Growth Options consultation document (GOCD);
- Interim Sustainability Appraisal; and
- The Evidence Base, including the Strategic Housing Market Assessment (SHMA), Housing and Economic Land Availability Assessment (HELAA) and New Settlements Topic Paper.

2.2 The representations are submitted pursuant to the promotion of lands known as Parcels 1 – 5 within Spooner Row (the “Sites”). The five Sites were submitted to the Call for Sites in 2016 and are the subject of the current Regulation 18 public consultation. The Sites are registered as follows:

| Parcel | Site 1 | Site 2 | Site 3 | Site 4 | Site 5 |
|--------------------------|-------------|-------------|---------------------|-------------|-------------|
| Call for Sites Reference | GNLPO444 | GNLPO445 | GNLPO446 | GNLPO447 | GNLPO448 |
| Total Site Area | 3.64 Ha | 4.08 Ha | 0.94 Ha | 6.84 Ha | 4.13 Ha |
| Net Developable Area | 2.45 Ha | 2.50 Ha | 0.45 Ha | 2.93 Ha | 1.5 Ha |
| Net Density | 18~25 dph | 18~25 dph | 10-12 dph | 20~30 dph | 18~25 dph |
| Homes | 44~61 Homes | 39~54 Homes | 4~5 Homes plus Shop | 59~88 Homes | 27~38 Homes |

2.3 These representations have been prepared in objective terms and assessed against the prevailing planning policy and guidance framework set out within the National Planning Policy Framework (NPPF) (March 2012) and National Planning Policy Guidance (PPG) (March 2014). The representations should be read in conjunction with the supporting Vision Document and accompanying consultant reports (attached as appendices). successfully accommodate a highly sustainable combined development of between 173 and 246 residential units comprising a mix of unit sizes and tenures including affordable

housing on unconstrained, intermediate and small sized areas of land, which are under single ownership and can be fully delivered in the early years of the plan period. The delivery of housing within the proposed parameters will positively contribute towards supporting the economic growth aspirations of the Local Plan and maintaining a 5 year housing land supply.

- 2.4 Although the Local Plan target of 2,256 dwellings per annum (inclusive of a 10% delivery buffer) is considered to be sufficient to meet the economic growth priorities identified in the consultation document, the proposed development strategy is significantly dependent upon housing delivery from strategic scale sites which runs the risk of not being fully delivered within the plan period. A development strategy which includes a larger delivery buffer and a range of more small and intermediate size allocated sites should be considered.
- 2.5 The GOCD advises that settlements within the bottom three tiers of the current framework would be merged into a single lowest tier of "Village Groups" within a settlement hierarchy of just four tiers. This proposed amendment to the settlement hierarchy would serve to underplay the significance of Spooner Row as a mid-tier settlement in terms of its scale, function and facilities as well as its capacity to accommodate future growth within the Cambridge to Norwich Growth Tech Corridor. This approach is considered to be flawed.
- 2.6 These representations provide comment on the growth strategy options and the associated evidence base. The conclusion of the representations confirms there is no sound reason to exclude these Sites, which would be a missed opportunity for Spooner Row, South Norfolk District Council and the ambitions of the emerging Greater Norwich Local Plan.
- 2.7 These representations also provide comment on the individual merits of each of the five Sites and an assessment of the other sites which have been proposed for development within Spooner Row.

3.0 JOBS AND HOUSING GROWTH

- 3.1 The GOCD (Section 4) sets out how the GNLP will seek to drive economic growth across the plan period by delivering an increase on forecast growth in jobs and productivity. This reflects the aims and aspirations of the Greater Norwich City Deal, covering the areas of Norwich City Council, South Norfolk District Council and Broadland District Council; and being delivered by the Greater Norwich Growth Board.
- 3.2 The City Deal was signed into effect by the Government in December 2013, giving Greater Norwich increased freedom to help businesses grow and create economic growth. The Deal aims to bring an additional 13,000 jobs and 3,000 homes (in addition to the Joint Core Strategy requirements) to the Greater Norwich area. As detailed in the Central Norfolk Strategic Housing Market Assessment (June 2017) this equates to a total of 45,390 jobs over the plan period.
- 3.3 The GOCD sets out six policies that will form part of the GNLP to support the required job and economic growth of the GNLP area. One of these policies promotes the Cambridge Norwich Tech Corridor (CNTC) growth initiative which is intended to enable the development of strategic employment locations and provide for local employment close to where people live.
- 3.4 The CNTC (initially proposed as the A11 Growth Corridor) began as a partnership between South Norfolk, Breckland and Forest Heath Councils. The Councils funded a comprehensive study of the corridor (Delivering the Economic Growth Potential of the A11 Corridor, Bruton Knowles, June 2016) which highlighted the potential for it to deliver 6,100 net additional jobs by 2031; many of which will be within high value employment sectors. Subsequently, the partnership team has expanded to also include Cambridgeshire County Council, East Cambridgeshire District Council, Greater Cambridge Greater Peterborough LEP, New Anglia LEP, Norfolk County Council, Norwich City Council, St Edmundsbury Borough Council and Suffolk County Council.
- 3.5 The full economic and social benefits of the CNTC will only be delivered if the GNLP provides significant support for the A11 corridor, including ensuring that there is sufficient housing provided within the corridor which is easily accessible to key employment opportunities. This will help achieve the goals of the Greater Norwich City Deal.
- 3.6 In calculating the housing numbers for the GNLP, the GOCD identifies the Government's proposed standardised methodology, of 2,052 dwelling per annum, as being the starting

point. This results in an overall housing requirement of 38,988 dwellings across the plan period. However, there is a clear aspiration in the GOCD to deliver 45,000+ new jobs between 2015 and 2036 (2,143 jobs per annum) and the proposed standard methodology guidance states that where there are economic aspirations leading to a housing need figure in excess of the standard method (the 2,052 dpa) the Government will support a higher housing need. Whilst the proposed standard methodology does not make it mandatory to adjust housing need for job growth, the existing OAHN does so. In the context of the economic aspirations of the GOCD, 2,256 new homes per annum inclusive of a 10% delivery buffer should be sufficient to achieve this subject to taking proper account of market signals and affordability in particular.

- 3.7 To ensure the GNLP provides sufficient flexibility to enable growth to come forward, the GOCD proposes windfall development be 'in addition' to the housing requirement. This is consistent with the context of the NPPF and the emphasis on boosting housing supply, with the housing requirement figure not being a ceiling and, therefore, additional housing being acceptable over and above that provided by commitments and allocations. This also removes reliance on unidentified sources and therefore provides a greater degree of certainty that the GNLP will meet its requirements across the plan period. We support this approach.
- 3.8 The GOCD acknowledges that the key to the success of the GNLP will be ensuring the delivery of jobs, infrastructure and that house building takes place. It acknowledges that not enough of the housing which is needed is being provided (para 1.12) and that there is a shortage of housing across all tenures in Greater Norwich. Overall, delivery of housing from 2008-14 was at approximately only 70% of the target (para 2.42). It therefore follows that the Vision, which helps provide the context for policy formulation, should be worded to better reflect the importance of ensuring that there is sufficient planned housing provision to support the proposed level of job growth.

4.0 AFFORDABILITY, HOUSING GROWTH AND HOUSING LAND SUPPLY

- 4.1 The proposed 10% housing delivery buffer would raise the proposed housing allocation to 7,200 homes. The GOHD confirms (para 4.22) that a delivery buffer lower than 10% would make it much less likely that needs would be met. A higher figure than 10% appears to have been dismissed on the basis that it would increase uncertainty for both housing developers and infrastructure providers, potentially risking delivery. However, this statement has not been supported by any evidence. Introducing a delivery buffer without taking full account of market signals regarding affordability, as confirmed in paragraph 5.31 of the Central Norfolk Strategic Housing Market Assessment 2017 (SHMA), does not accord with current Government thinking.
- 4.2 The SHMA confirms that affordability (in terms of the ratio between lower quartile house prices and lower quartile earnings) at 8.3 (as of 2015) is higher in Central Norfolk than it is across England as a whole. Furthermore, affordability ratios have worsened since 2010, with the ratio in Central Norfolk increasing from 7.7 to 8.3, a change of 8%. This is a greater change than the equivalent rate for England as a whole, where the ratio increased from 6.7 to 7.0, a change of 5%. What is clearly shown just from this one indicator is that the area has not been delivering sufficient housing to meet its needs and this lack of growth is driving house prices above the national average.
- 4.3 Since the publication of the Planning Practice Guidance (PPG), the approach taken to market signals and the degree to which Councils have responded to these signals has varied considerably. The PPG provides no detail as to the how much of an uplift is necessary in relation to the nature of market signals in a given area. Until recently the only guidance came from the Local Plan Expert Group which suggested uplifts of over 25% where affordability ratios showed house prices were more than 8 times local salaries. As such the degree of uplift that has been applied in different areas has been significant even where market signals have been similar. However, more recently we have seen uplifts of 15% to 20% being applied where market signals have shown a worsening position with regard to affordability. The most recent example is Waverley Borough Council¹ where the inspector agreed that a 25% uplift was required to address the affordability concerns in that Borough.
- 4.4 However, this lack of clarity on market signals has now been partly addressed with the publication of 'Planning for the Right Homes in the Right Places' in September 2017. This consultation sets out the Government's proposals for assessing housing need using a
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standard methodology. Whilst this consultation and the methodology cannot be given any significant weight it does provide evidence as to the degree of uplift the Government thinks necessary where affordability is worst. The reason why this element should be given weight is the long term commitment by the Government to deliver 300,000 homes every year. Unless there is a significant increase in delivery above household projections this level of delivery will not be achieved.

- 4.5 The consultation proposes that where affordability ratios indicate house prices to be more than four times median local salaries then an uplift should be applied. Where, for example, house prices are eight times median salaries the uplift should be 25% above the baseline demographic projection. This approach is more in line with the approach suggested by the Local Plan Expert Group rather than the relatively limited response that has been made in many SHMAs since the introduction of PPG.
- 4.6 Evidence on past supply would also suggest a significant uplift is required. Based on the Council's own evidence there has been a record of significant shortfall in housing delivery. Any uplift for a plan considering delivery up to 2036 will need to ensure that any uplift takes its backlog into account, and the fact that this will have effected household growth during this period.
- 4.7 In response to market signals we would therefore suggest that the GNLP should be planning for at least 2,052 dwellings per annum. Based upon the standard methodology, inclusive of forecast jobs growth and a delivery/affordability buffer in excess of 10%, the GNLP would need to make additional allocations for housing over and above the current growth strategy. Even if the standard methodology is not introduced it is clear that a higher uplift would be appropriate on the basis of current policy and Government thinking.
- 4.8 It should also be noted that there is a shortage of housing across all tenures in Greater Norwich. Although it is acknowledged that completions have increased every year since 2010, overall delivery of housing still remains low at approximately 70% of the target. The Government supports the principle of higher delivery buffers in those circumstances where there has been a significant under delivery of housing to improve the prospect of achieving the planned supply. By taking a more positive approach and seeking to meet the higher level of housing need the Local Plan is more likely to be in conformity with national policy; more capable of being delivered quickly; and more likely to have a positive impact on housing affordability.

5.0 GROWTH OPTIONS

- 5.1 Acceleration of delivery should also be a key objective of the GNLP and housing should be encouraged in those locations where growth has occurred to meet market demand. The vision should acknowledge the need to accelerate housing delivery and the preferred growth option should be underpinned with this key objective.
- 5.2 Job creation is also a key plan objective and supporting the CNTC will be critical to securing the long term economic success of the Greater Norwich Area and its wider hinterland. The GOHD confirms that access to services and jobs are key considerations, as is the need to ensure that housing is allocated in the locations most likely to deliver to meet housing need. However, Growth Option 3 which is supposed to specifically support the CNTC, includes a proposed allocation of 500 dwellings for a New Village even though there is clearly sufficient capacity within existing villages and in particular Service Villages within the CNTC such as Spooner Row to accommodate further growth at levels which will accelerate delivery, deliver community benefits, improve the social cohesion and the sustainability of these smaller settlements whilst providing convenient access to job opportunities within the CNTC.
- 5.3 We support Growth Option 3 subject to the removal of provision for a New Village and a corresponding increase in allocated housing provision for Service Villages, Other Villages as well as Key Service Centres within the CNTC. This will create the most sustainable Growth Option which will also best support the jobs growth strategy and increase the potential for accelerated housing delivery.
- 5.4 In addition, Growth Option 3 subject to the removal of the New Village allocation and its replacement with dispersal along the CNTC will provide opportunities for smaller settlements to increase their capital of community infrastructure by encouraging the provision of facilities to support growth which may not exist currently such as local shops, parkland, play facilities etc. This approach will serve to enhance the sustainability of smaller settlements within the CNTC.

Q1. Do you agree with the draft vision and objectives for the plan?

- 5.5 The core objective (Vision) should be amended to read as follows:

“To maintain and grow a robust, vibrant and diverse economy and to accelerate the delivery of homes in accessible locations to support the target level of job growth whilst providing the supporting infrastructure as

well as facilitating sustainable environments for the health and well-being of communities.”

Q2. Do you support the broad strategic approach to delivering jobs, homes and infrastructure?

- 5.6 Yes. Para 4.1 of the GOCD confirms delivery is key to the success of the plan. To realise this, and to successfully achieve the Visions and Objectives of the plan, the document identifies 6no. policy headings which will be included in the GNLP. We support the broad objectives and the policy headings. However, a further policy heading is required to acknowledge the need to accelerate the delivery of housing. We note that if these objectives are to be met, there is a need to ensure that the Growth Option which is most likely to the deliver the Visions and Objectives of the plan is pursued. Growth Option 3 will focus growth where it is needed to support jobs growth and where there is market demand which will accelerate delivery. Places such as Spooner Row are critical in this respect.

Q4. Do you agree that the OAN for 2017 – 2036 is around 39,000 homes?

- 5.7 Yes. The Government’s proposed standardised methodology for Greater Norwich requires the delivery of 2,052 dwellings per annum, or a requirement of 38,988 dwellings across the plan period (2017 to 2036). The Growth Options consultation document (GOCD) correctly identifies this as the starting point for calculating the housing requirement for the plan (para 4.18).

Q5. Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?

- 5.8 The 10% buffer, equating to a total of 3,899 dwellings would include the additional 1,700 dwellings identified to meet the City Deal and results in a remaining additional 2,199 dwellings to be allocated. This takes the total housing requirement to 42,887 and the need to identify 7,200 new allocations.
- 5.9 Whilst Section 4 of the GOCD confirms that one of the key aims of the GNLP will be to drive economic growth across the plan period by delivering an increase on forecast growth in jobs and productivity, an uplift of 10% may not sufficiently address affordability and the need to accelerate housing delivery.

Q6. Do you agree that windfall development should be in addition to the 7,200 homes?

- 5.10 Yes. To ensure the GNLP provides sufficient flexibility to enable growth to come forward, the GOCD proposes windfall development be ‘in addition’ to the housing requirement. This is consistent with the context of the NPPF (including the emerging NPPF).

- 5.11 Given the lack of delivery in the Joint Core Strategy area, there is a particular need to ensure a strong emphasis on boosting housing supply. In this respect, the current Joint Core Strategy provides an 'at least' housing target. In the light of the intention to rely on so many additional windfall dwellings (5,600 dwellings) to introduce the flexibility, the plan should reflect that the 42,887 target is an at least figure with the housing requirement figure not being a ceiling. This would support the GNGB 'pro-growth' agenda.
- 5.12 While anticipated windfall development will go some way to delivering additional housing, the scale of the windfall figure could have an impact on local infrastructure and services. It is therefore recommended that the GNGB undertake an appropriate evidence base (i.e. SEA/SA) on a total housing figure of 48,487 dwellings.

Q7. Are there any infrastructure requirements needed to support the overall scale of growth?

- 5.13 Yes. The scale of development committed to will clearly require the provision of new infrastructure to appropriately and sustainably meet the demands of this growth. Small and medium sized allocations would be less dependent upon major infrastructure provision. Nevertheless, there are primary school capacity issues in the south-west sector of the plan area which could be negatively impacted even by small and medium scale housing development. Ensuring that there is sufficient land available and secured to enable the enlargement of primary schools, particularly in village locations, will be essential.

Q8. Is there any evidence that the existing housing commitment will not be delivered by 2036?

- 5.14 Yes. At the mid-point of the Joint Core Strategy plan period, there is clear evidence that the delivery rates in the Joint Core Strategy Area have never been met (see Annual Monitoring Report 2016 – 17, March 2018 Appendix A). There is at present a deficit of 4,957 dwellings (of a cumulative 18,414 requirement) from the start of the plan period (2008/09) to the most recent monitoring year (2016/17) (collective failure). The plan target of 2,046 dpa has consistently not been achieved. The deficit within the NPA is even higher at 6,493 dwellings of a cumulative 16,425 requirement (1,825 dpa) during this period.
- 5.15 Whilst it is recognised that there are external factors that can affect delivery, the collective failure of the Joint Core Strategy's planned allocations in not meeting the target represents a real risk that the existing commitments will not be fully delivered by 2036.
- 5.16 Within the NPA, the forward 5-year annual completion rate to meet the Joint Core Strategy minimum target level, including the required 20% buffer, is now in the range of 3,056 to

3,748 dpa (double the planned rate), with the Annual Monitoring Report 2016-17 conceding the requirement in the 5-year period 2017 – 2022 will fall short by up to 4,650 dwellings.

- 5.17 In this respect, it will be critical that deliverable sites in suitable locations such as Spooner Row where people want to live, which can be delivered quickly are selected, as compared to the creation of say, a new Garden Village which will require substantial upgrades to existing infrastructure and significant new infrastructure with exposure to the real risk of delivery delay.
- 5.18 The new annual target for 2017 – 2036 (assuming 42,887 dwellings) will represent an annual requirement of 2,257dpa. This equates to 11,286 dwellings in any given 5-year period and assumes that the current deficit (in excess of 6,400 dwellings) is 'wiped clean'. This could potentially give the impression that 'all is well' and the failure to meet past targets is simply forgotten.

Q9. Which alternative or alternatives do you favour?

- 5.17 Option 3 with amendment as proposed in paragraphs 5.3-5.4 above is our favoured option. This is in part a reflection of the aims and visions identified in the Spatial Options, the evidence presented in these representations and the role Spooner Row can play both in its location to the A11 and Norwich, as well as the suitability and deliverability of the five Sites which are being promoted. Para 4.65 of the GOCD acknowledges the chosen strategy may be an amalgamation of the options, with no 'preferred' options identified at this time. We support this recognition.

Q11. Are there any other strategic growth options that should be considered?

- 5.18 Yes. We consider that Option 3 should come forward as a preferred option with the removal of the New Village allocation and its replacement with dispersal along the CNTC. This would serve to ensure that there is a focus for delivering development along the A11 corridor, fulfilling the Spatial Objectives of supporting the Cambridge to Norwich Tech Corridor, plus locating growth near to jobs and infrastructure. Spooner Row has the capacity to accommodate a generous scale of growth relative to the size of the settlement. This is due to its Service Centre status which should be retained and that it is a location that has delivered housing. It has good employment opportunities nearby in Wymondham areas and is located in close proximity to Norwich.
- 5.19 We believe that Spooner Row should remain as a Service Centre in the settlement hierarchy.

Q12. Do you support the long term development of a new settlement or settlements?

- 5.20 As part of the consultation, a New Settlements Topic Paper has been produced, supporting the GOCD which considers whether a new settlement could assist in meeting the plan's growth objectives. This is considered in response of 2 sites, namely at Honingham Thorpe (site reference GNLP 0415 A to G) and West of Hethel (site reference GNLP1055) submitted through the 'call for sites' which could potentially support a new settlement including housing and other uses.
- 5.21 In order for a new settlement to be sustainable and achieve the principles of being a Garden Village or Garden Town, it must be of sufficient scale to support a range of facilities and services, thereby being relatively 'self-contained'. The Government defines a Garden Village being a settlement between 1,500 and 10,000 homes and a Garden Town in excess of this.
- 5.22 The Topic Paper highlights that a minimum size for a new settlement will need to be 2,000 homes, being able to support a primary school and a small range of local shops and other services. Any site below this, not an extension to an existing urban area or large village, would consequently be an isolated group of houses in the open countryside, and therefore not sustainable.
- 5.23 The delivery of new settlements is risky and unpredictable, with the opportunities and constraints afforded by the submitted sites currently unknown until in-depth and detailed site investigation work has been undertaken. Furthermore, in order to deliver these settlements significant new infrastructure will be required, the costs of which need to be secured by way of legal agreement with landowners prior to allocation, to capitalise the uplift in land values.
- 5.24 The sites put forward at Honingham Thorpe and Hethel are not currently serviced by the infrastructure essential to support the necessary growth. The significant infrastructure, including highways and social infrastructure, would need to be delivered up-front. While this may be achievable in the long-term, especially if a necessary legal agreement is entered into, it is unlikely to be deliverable within this plan period.
- 5.25 While the delivery of a new settlement could be a suitable long-term aspiration of the plan, it is not considered appropriate for the emerging GNLP to rely upon it delivering housing in the current plan period.
- 5.26 Furthermore, it is not considered necessary for the GNLP to rely upon the delivery of a new settlement, as sufficient suitable and deliverable land is available within Service Villages such as Spooner Row and other sustainable settlements located within the CNTC.

Q21. Do you favour option SH1, and are the villages shown in appendix 3 correctly placed?

- 5.27 No. The grouping together of 'Service Villages', 'Other Villages' and 'Smaller Rural Communities and the Countryside' into a single lowest tier within a settlement hierarchy comprising just four rather than six tiers as is currently the case would significantly undermine the function and role that Service Villages can play in accommodating future growth. Service Villages such as Spooner Row include a range of functions and services which are more closely aligned to the functions and service characteristics of Service Centres (currently 3rd tier) than they are to Other Villages (5th tier) which are defined by their offer of just a very basic, narrow range of services. To put it simply, Service Villages such as Spooner Row are much more sustainable settlements capable of accommodating much higher housing growth than Other Villages and Smaller Rural Communities and the Countryside.
- 5.28 In the event that the settlement hierarchy is to be rationalised into four tiers we would recommend that Service Centres and Service Villages should be combined into a single 3rd tier and Other Villages combined with Smaller Rural Communities and the Countryside to form a 4th tier.

Q26. Do you support a Norwich centred policy area and, if so, why and on what boundaries?

- 5.29 Yes. We support a Policy area focused towards Norwich City. Historically, the Norwich Policy Area (NPA) has been the area used to ensure that growth needs arising from the Norwich urban area are delivered as acknowledged through para 4.159 – 4.170 of the GOCD. The NPA is a long-standing policy designation, previously identified within the Norfolk Structure Plan and carried forward within the East of England Regional Spatial Strategy which encouraged Norwich-related growth to be located in close proximity to the City.
- 5.30 The importance of the NPA was acknowledged in the adopted Joint Core Strategy (2011) which sought to direct strategic growth to this area, including significant levels of housing, improved employment opportunities and key infrastructure development. The NPA has been successful in directing growth to this area and ensuring the identified social and environmental benefits have been (or are being) successfully delivered. This has, in part, been due to the requirement for sufficient sites to be identified to meet the NPA housing requirement, and as such a 5-year housing land supply within the NPA to be maintained.

- 5.31 The SHMA, which forms part of the evidence base for this consultation, identifies that the NPA itself does not form a functional housing market area (HMA). While the GOCD acknowledges the role the NPA has played in the past it argues it is no longer appropriate for a NPA specific housing land supply to be required/monitored. We disagree with this conclusion and consider the GOCD is confusing the role of a SHMA for the purposes of determining Housing Needs and a specific policy based area to ensure the right growth is delivered in the right locations.
- 5.32 While the NPA itself does not form a functional HMA, a slightly larger area, defined as the 'Core Area' has been concluded to be a functional HMA. However, given no other settlements outside this area are sufficiently self-contained to establish a separate HMA (or areas), the SHMA concludes the most appropriate HMA, for the plan, is the Central Norfolk HMA.
- 5.33 Regardless of the HMA, the Core Area has been demonstrated to be the area with the strongest functional connection to the Norwich Urban Area. On this basis, the evidence clearly supports the GNLP directing growth to this Core Area. We strongly urge the GNLP to continue the approach set by the NPA in directing growth to the Core Area with the boundary also to reflect the preferred spatial strategy i.e. towards an A11 focus. Without a policy area focusing growth in key locations, there are risks that the strategy will fail.
- 5.34 As acknowledged as one of the key policy headings for the GNLP, in order to meet the plan's Visions and Objectives, the GNLP will promote the CNTC. The full economic and social benefits of the CNTC can only be realised if the GNLP provides significant support for this key growth location, including backing development opportunities within this Corridor and, importantly, ensuring sufficient housing is provided, in close proximity to existing and proposed employment opportunities.
- 5.35 Whilst it may be argued that the identification of specific sites will alleviate the need to for a policy area to direct growth, it is still deemed important that the area is defined, in the event that alternative sites are required to be relied upon to deliver houses or jobs in the event the allocated sites, for whatever reason, fail to deliver. This ensures the plan has the ability to respond rapidly to the market with the focus remaining on the growth locations.
- 5.36 A positively prepared, effective and justified Plan will need to ensure it has fully considered the potential benefits arising from the CNTC and, where necessary, supports its delivery. The most appropriate strategic growth option will include the necessary measures to enable this.

6.0 THE SITES

Site 1

- 6.1 This site (call for sites reference GNLP0444) which is currently in agricultural use is located to the east side of the railway line on the west side of Burwell Road, approximately 115 metres south of the junction with Station Road and Chapel Road. The irregular shaped site area measures 3.64ha and is bounded by residential development to the north, a field hedgerow and mature tree boundary to the west and a partial hedgerow field boundary to the east facing onto housing along the east side of Bunwell Road. The site is proposed for housing with associated open space, a sustainable drainage scheme, a play area and a wild meadow.
- 6.2 The site is enclosed on two of its three sides (north and east) by residential development and beyond the highly enclosed western boundary of the site bounded by Queen's Street are residential properties and associated land which has been removed from agricultural use. The site is therefore well related to the existing settlement and will logically infill the gap which exists between linear settlement form along Queen's Street and along Bunwell Road.
- 6.3 The majority of the site falls within flood zone 1 with just a small proportion to the northern section of the site falling within flood zone 2 and 3. This part of the land will not be developed and instead will form part of an integrated sustainable drainage scheme which will provide flood protection within and beyond the site. Notwithstanding the comments made in the HELAA Suitability Assessment, significant areas of the site are not at risk of flooding, but flood attenuation works would be required.
- 6.4 The site is not constrained by utilities infrastructure, contamination or ground instability. Furthermore, it is not directly affected by any landscape designations and development within the site would not impact on any designated ecological areas.
- 6.5 There is no central core to the village and village facilities are located in two loose clusters along and adjacent to Station Road on the west and east sides of the railway line. From the site the primary school is 550m distance at its closest point and 850m distance at its furthest point. The village hall is 450m distance at its closest point and 775m distance at its furthest point. The railway station is 400m distance at its closest point and 715m distance at its furthest point. The pub and coffee shop are 85m distance at their closest point and 425m distance at their furthest point. The church is 150m distance at its closest

point and 480m distance at its furthest point. The site is therefore clearly and conveniently accessible by foot and bicycle to local village services using existing footpaths and the provision of a children's play facility within the site will provide a much needed amenity which will be accessible to village residents to both the west and east sides of the railway line.

- 6.6 Taking account of the retention of strategic landscaping, play and open space requirements, the inclusion of a sustainable drainage scheme and associated flood protection measures, the net developable area should be limited to no more than 2.45ha. Having regard to existing density and grain of neighbouring development the density of development should ideally be a minimum of 18 dwellings per hectare (dph) and a maximum of 25dph.

Site 2

- 6.7 This site (call for sites reference GNLP0445) is currently in agricultural use and is located immediately to the east side of the railway line and on the south side of Station Road. This largely rhombus shaped 4.06 hectare site is bounded to the west by a field hedgerow behind which is the railway line, the station halt and housing. This site is bounded to the east by the rear gardens of residential development; to the north by Station Road with open agricultural land beyond; and to the south by a field hedgerow and mature trees with agricultural land beyond.
- 6.8 The immediate locality has a mixed character of low density residential and open countryside. The site is well related to the existing settlement and the development of this site will logically infill a gap and consolidate the fractured settlement pattern within Spooner Row creating a more cohesive village morphology. Furthermore, the development of this land would include the addition of a footpath to the south side of Station Road parallel with the site. This will significantly improve access within the village and surveillance from houses fronting onto Station Road will provide improved surveillance in the interests of community safety.
- 6.9 The majority of the site falls within flood zone 1 with just a very small proportion to the north-east corner of the site falling within flood zones 2 and 3. This part of the land will not be developed and instead will form part of an integrated sustainable drainage scheme which will provide flood protection within and beyond the site. Notwithstanding the comments made in the HELAA Suitability Assessment, significant areas of the site are not at risk of flooding, but flood attenuation works would be required.

- 6.10 The site is not constrained by utilities infrastructure, contamination or ground instability. Furthermore, it is not directly affected by any landscape designations and development within the site would not impact on any designated ecological areas.
- 6.11 As mentioned earlier there is no central core to the village and village facilities are located in two loose clusters along and adjacent to Station Road on the west and east sides of the railway line. From the site the primary school is 185m distance at its closest point and 405m distance at its furthest point. The village hall is 85m distance at its closest point and 300m distance at its furthest point. The railway station halt is 20m distance at its closest point and 250m distance at its furthest point. The pub and coffee shop are 130m distance at their closest point and 420m distance at their furthest point. The church is 140m distance at its closest point and 435m distance at its furthest point. The site is therefore clearly and conveniently accessible by foot and bicycle to local village services using existing footpaths and the provision of a children's play facility within the site will provide a much needed amenity which will be accessible to village residents to both the west and east sides of the railway line.
- 6.12 The development of this site will significantly enhance the cohesion of an otherwise fractured settlement pattern within the village by physically linking east to west. The gap which exists between the east and west sides of the village is not special in terms of its landscape value and there are no proposals presented within the emerging Local Plan to preserve the existing settlement pattern because of its heritage value or because it has a special character which needs to be retained. There is no sound planning reason which exists for resisting the consolidation of the settlement form of the village.
- 6.13 The siting of dwellings fronting onto Station Road and the formation of a new footpath on the south side of this section of carriageway will positively enhance natural surveillance and benefit community safety within the village. The provision of public open space and associated children's play facilities will improve the amenities of the village. The formation of a wet balancing pond and the introduction of a wild meadow habitat will enhance the biodiversity value of the village.
- 6.14 Taking account of the retention of strategic landscaping, setting and views, play and open space requirements, the inclusion of a sustainable drainage scheme and associated flood protection measures, the net developable area should be limited to no more than 2.16ha. Having regard to existing density and grain of neighbouring development the density of development should ideally be a minimum of 18 dwellings per hectare (dph) and a maximum of 25dph.

Site 3

- 6.15 This site (call for sites reference GNLP0446) is an L shaped 0.9 hectare area of unmanaged grassland located at the junction of Guiler's Lane and Chapel Road. The land is partially bounded to the south alongside Guiler's Lane by a short section of low hedgerow and several mature trees with the remainder of this boundary remaining unenclosed. The boundary to the western edge of the site is primarily a low hedgerow intermittently intersected by mature trees.
- 6.16 The north and east edge of the site interfaces with an open private drive punctuated by occasional trees leading to residential properties with rear garden enclosures comprising walls and hedgerows. The site is surrounded by the Grade II listed church and its grounds immediately to the west; low density residential development to the north; an enclosed field used as a sports pitch to the east; and The Boar public house as well as low density residential development to the south. Generally, the site is well contained and the immediate surroundings are characterised by low density built up development which is typical of a rural village. The development of this site would consolidate the gap which exists between the ribbon development along Chapel Road to the north and the ribbon development along Queen's Street and Bunwell Road to the south.
- 6.17 The site is not constrained by utilities infrastructure, contamination or ground instability. Furthermore, it is not directly affected by any landscape designations and development within the site would not impact on any designated ecological areas.
- 6.18 There are heritage constraints which will affect how the site will be developed. Immediately to the west is the grade II Holy Trinity church and to the north is Pilgrim's Farmhouse which is also a grade II listed building. The setting of both of these heritage assets would have to be considered, in accordance with NPPF requirements set out in paragraphs 128-135. The fact that the site is adjacent to these heritage assets is not a constraint which would preclude the principle of residential development on the site.
- 6.19 From the site the primary school is 185m distance at its closest point and 405m distance at its furthest point. The village hall is 85m distance at its closest point and 300m distance at its furthest point. The railway station halt is 20m distance at its closest point and 250m distance at its furthest point. The pub and coffee shop are 130m distance at their closest point and 420m distance at their furthest point. The church is 140m distance at its closest point and 435m distance at its furthest point. The site is therefore clearly and conveniently accessible by foot and bicycle to local village services using existing footpaths.

- 6.20 The immediate local context is characterised by low density development and this established character should also be applied to this particular site. It is therefore proposed that the number of dwellings to be accommodated should be limited to no more than 6 across approximately half of the site area. The remaining land will make provision for public open space and a car park which will provide for much needed overspill parking to serve both the public house and the church. There is also the potential to incorporate a shop unit within the development of this site which is located very centrally for the bulk of existing housing within the village. This would provide the village with a much needed amenity which would improve the settlement's sustainability value and the proposed overspill car park could provide a dual function of serving the shop and adjoining village amenities.

Site 4

- 6.21 This site (call for sites reference GNLP0447) is an irregular shaped 6.8 hectare area of land proposed for housing, public open space, sustainable drainage and a potential car park to serve the train station. The site is mostly bounded to the west by the railway line with domestic gardens and farmland beyond. The north-east section of the site is bounded by domestic gardens of houses sited along Chapel Road and Chapel Loke. The south-east end of the site is bounded by the grounds to the grade II listed Holy Trinity church. The eastern edge of the site is bounded by low hedgerows and a section of tall mature trees approaching the church. The southern edge of the site facing onto Station Road is bounded by a knee rail fence. The majority of the site is in agricultural use whilst a smaller, triangular section of the site abutting Station Road and the railway line is characterised by unmanaged grassland. Although the general character of the site is open and rural the northern half of the site is well contained by the railway line to the west and residential development to the east.
- 6.22 The site is not constrained by utilities infrastructure, contamination or ground instability. Furthermore, it is not directly affected by any landscape designations and development within the site would not impact on any designated ecological areas.
- 6.23 The majority of the site falls within flood zone 1 although there is a sizeable area of the southern section of the site which falls within flood zones 2 and 3. This part of the land will not be developed and instead will form part of an integrated sustainable drainage scheme which will provide flood protection within and beyond the site. The water bodies will become part of a structured public open space which will provide a central amenity feature within the village.

- 6.24 The setting of the listed church would have to be considered in accordance with NPPF requirements as set out in paragraphs 128-135. The fact that the site is adjacent to this heritage asset is not a constraint which would preclude the principle of residential development on the site.
- 6.25 The site is well related to local village amenities which would all be within reasonable walking distance from the site. Maintaining an open aspect at the southern end of the site by incorporating a generous area of landscaped open space will maintain a break in the settlement form and the high degree of enclosure in the northern section of the site will enable housing to be built out at between 20-30 dwellings per hectare. Furthermore, there is sufficient space available in the south-west corner of the site, outside of flood zones 2 and 3, to enable the provision of a car park to serve the needs of train users.
- 6.26 Whilst there are several constraints affecting the site the cumulative requirement for mitigation of these constraints is manageable. Combined with the limited impact on the existing settlement, the mitigation requirements do not weigh against the suitability of the site to be allocated for housing or the viability of a scheme comprising 59-88 dwellings. At least 45% of the site is suitable for housing and most of the remaining land in the southern section of the site is suitable for use as landscaped public open space, flood mitigation, the formation of new habitats and the provision of a car park to serve the railway station halt. The design of the open space to function as a landscaped village green will improve the amenity value of the village whilst maintaining a visual break between the settlement zones on each side of the railway line.
- 6.27 It should be noted that the village is predominantly characterised by large detached and semi-detached dwellings sited in relatively large plots with smaller, more affordable dwelling types making up only a small amount of the total housing stock. This site offers the opportunity to provide, in addition to affordable housing, a range of dwelling types which would include more affordable smaller units which will assist in creating greater choice and maintaining the vitality of the village.

Site 5

- 6.28 This site (call for sites reference GNLPO448) is a rectilinear 3.95 hectare area of land proposed for housing and public open space, with the potential also to accommodate future school expansion needs and the provision of allotments. A small strip of the site running parallel and alongside School Lane has previously been allocated for housing.

- 6.29 The land is currently in agricultural arable use and is bounded by similar land to the west and north and the A11 Wymondham Bypass beyond; the Spooner Row Primary School sports pitches and open space and housing to the south, bounded by sections of tall hedgerow and mature trees; highly enclosed residential development to the north-east bounded by hedgerows and trees; and low density residential development bounded by tall hedgerows to the east along School Lane.
- 6.30 The site has convenient access to existing local services (school, village hall, bus stop, station halt, public house and church) which are all within close proximity by foot and bicycle. Site access is achievable onto School Lane and whilst the existing pedestrian access along this road is currently unsuitable for the scale of development proposed, there is ample opportunity available to install an adoptable footpath from the site along School Lane up to the junction with Station Road where the visibility splays are satisfactory. The site is therefore entirely accessible and the close proximity to local services demonstrates its sustainable location.
- 6.31 The entire site falls within Flood Zone 1 but to avoid any risk of localised surface water flood risk, a sustainable drainage scheme will be installed to protect the site and its environs.
- 6.32 It is acknowledged that the site could be impacted by road traffic noise generated from the A11 Wyndonham Bypass. However, suitable noise mitigation measures can be incorporated to address this potential issue in terms of rear garden configurations, building soundproofing and ventilation.
- 6.33 1.5ha of residential development within this site delivering 27-38 dwellings would be of a scale which would not over-dominate the existing village. It should be noted that the village is predominantly characterised by large detached and semi-detached dwellings sited in relatively large plots with smaller, more affordable dwelling types making up only a small amount of the total housing stock. This site offers the opportunity to provide, in addition to affordable housing, a range of dwelling types which would include more affordable smaller units which will assist in creating greater choice and with maintaining the vitality of the village.
- 6.34 It is acknowledged that the adjacent primary is over-subscribed in terms of pupil numbers and that the aggregate impact of school place demand from the five Sites could give rise to a need to provide additional classrooms and associated infrastructure including school sports pitches, extended play areas and staff car parking. It is for this reason that this site could make such provision available and this will ensure that the school will have the

necessary site capacity to accommodate its future growth needs. Any residual land could be made available to provide for an allotment to serve the Sites and the wider village.

- 6.35 A balanced approach to providing a much needed proportionate mix of housing in conjunction with the delivery of community infrastructure on this site will positively contribute towards the future vitality of the village.

7.0 CONCLUSION

- 7.1 These representations have been drafted on behalf of JM Greetham No 2 Settlement, pursuant to land interests in Spooner Row. The five Sites are considered appropriate for residential development and would have a capacity of 173-246 dwellings. These representations are accompanied by a Vision Document (Appendix 1), which assesses the Sites in detail and provides an illustrative masterplan. This shows how an aggregate of 170+ dwellings can easily be achieved on the identified sites whilst also providing adequate open space and additional landscape planting.
- 7.2 The allocation of a large proportion of smaller and medium size sites should be encouraged within the GNLP. The five Sites are immediately available, in single ownership, and able to deliver 170+ dwellings in the short term early in the plan period. Typically, such projects have significantly reduced infrastructure requirements when compared to larger allocations. As a result, they can assist the GNLP in achieving its five year housing land supply by ensuring various sustainable schemes are delivering homes at any one time, and where one delay to a scheme would not materially impact delivery rates, unlike strategic sites. The content of this report in conjunction with the appended Vision Document demonstrates there is no logical reason for these Sites to be excluded, particularly noting their proximity to services and facilities, and to future employment opportunities within the CNTC.
- 7.3 Having regard to the GOHD and in particular Growth Option 3, Service Villages within the CNTC such as Spooner Row are capable of accommodating further growth at levels which will accelerate delivery; deliver meaningful community benefits; improve the social cohesion of the village; and enhance the sustainability of these smaller settlements whilst providing convenient access to future job opportunities within the CNTC. Supporting the jobs growth strategy by focussing housing growth within the CTNC and increasing the potential for accelerated housing delivery should be a key objective of the GNLP.
- 7.4 Affordability directly impacts upon housing delivery and this issue has not been sufficiently factored into the proposed housing figures. A higher delivery buffer should be considered to address affordability and to accelerate housing delivery which has historically fallen significantly short of the target.
- 7.5 The Sites 1 - 5 are therefore commended to the GNLP for residential development and should be allocated accordingly.

APPENDIX 1

Vision Document

Spooner Row

VILLAGE GROWTH FRAMEWORK AND VISION

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1. INTRODUCTION

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5. CONCEPT

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1. Introduction

This Development Framework and Vision has been prepared on behalf of Titchmarsh & Co and relates to 5 separate parcels of land in Spooner Row, South Norfolk.

This document sets out the principles and concept for overall village growth which envisions a better equipped service village, then identifies and illustrates development frameworks for the 5 parcels represented separately for the Call for Sites process.

The Village Assessment maps out the existing settlements, services and facilities and the walkable village extent. The Opportunities and Constraints section identifies existing conditions in the village such as flood zones, listed buildings, existing vegetation, landscape designations and landscape characteristics in order to identify potential housing growth areas and public open space.

The Concept drawings establishes principles of village growth and sets out the physical structure of the growth strategy which would inform a sustainable and sensitive village growth.

The Illustrative Framework shows potential development of the 5 parcels amongst the identified growth areas and proposed public open space.

This document is informed by preliminary studies including transport / highway assessment, flood risk assessment and landscape and visual assessment considerations.



HOLY TRINITY CHURCH



BUNWELL ROAD



CHAPEL ROAD



STATION ROAD



AERIAL VIEW OF SPOONER ROW

2. Planning Policy Context

The village of Spooner Row is situated within the district of South Norfolk. The current development plan for South Norfolk consists of the following documents:

- Joint Core Strategy
- Site Specific Allocations and Policies Document
- Wymondham Area Action Plan
- Development Management Policies Document
- Long Stratton Area Action Plan

LOCAL PLAN

The Joint Core Strategy (JCS) has been developed by the Greater Norwich Development Partnership (GNDP) (of which South Norfolk Council is a member) and sets out the overarching strategy for growth across Norwich, Broadland and South Norfolk for the period 2008 - 2026.

Following adoption in 2011 a legal challenge was made and as a result, parts of the text and some associated maps and diagrams relating to housing growth in Broadland were remitted by High Court Order. Subsequent to further consultation and an examination in 2013, the proposals for the Broadland part of the Norwich Policy Area were found sound. The complete adopted Joint Core Strategy for Broadland, Norwich and South Norfolk therefore comprises the JCS document

adopted in March 2011, as amended by the Broadland Part of the Norwich Policy Area: Local Plan, adopted in January 2014.

The adopted JCS identifies the need to provide 36,820 new homes of which approximately 33,000 will be in the Norwich Policy Area (NPA). The NPA has been defined to provide a focus for planning and coordinating Norwich related growth. The NPA includes the city of Norwich, part of South Norfolk (including the village of Spooner Row), and part of Broadland District.

Policy 15 of the Joint Core Strategy (JCS) identifies Spooner Row as a Service Village in which land will be allocated for small-scale housing growth in the period 1 April 2008 to 31 March 2026, within the range of 10-20 dwellings, subject to form, character and servicing constraints. Settlements identified in this policy that are also within the Norwich Policy Area may be considered for additional development, if necessary, to help deliver the 'smaller sites in the NPA' allowance.

Service Villages are defined based on having a good level of services/facilities. The services considered to be the most important are:

- primary school
- food shop
- journey to work public transport service (to Norwich, a Main Town, a Key Service Centre, or a comparable centre outside the plan area)
- village hall

The Site Specific Allocations and Policies Document (Oct 2015) identifies two allocations in Spooner Row which equate to a total of 15 dwellings over the total plan period.

STRATEGIC HOUSING MARKET ASSESSMENT (JAN 2016)

Recently, a Strategic Housing Market Assessment (SHMA) was undertaken to establish the Objectively Assessed Need (OAN) for housing for the local authorities which form part of the GNDP. The report concluded that on the basis of market signals and the need to balance workers and jobs, the OAN for the HMA should be increased. Therefore the SHMA identifies an OAN for 70,483 dwellings over the 24-year period 2012-36, an annual average of 2,937. This represents a 20% increase above the demographic trends for the area which is largely due to the impact of the additional jobs planned as part of the City Deal for Greater Norwich. With regards to South Norfolk, the breakdown of OAN is 10,998 which equates to an annual average of 458.

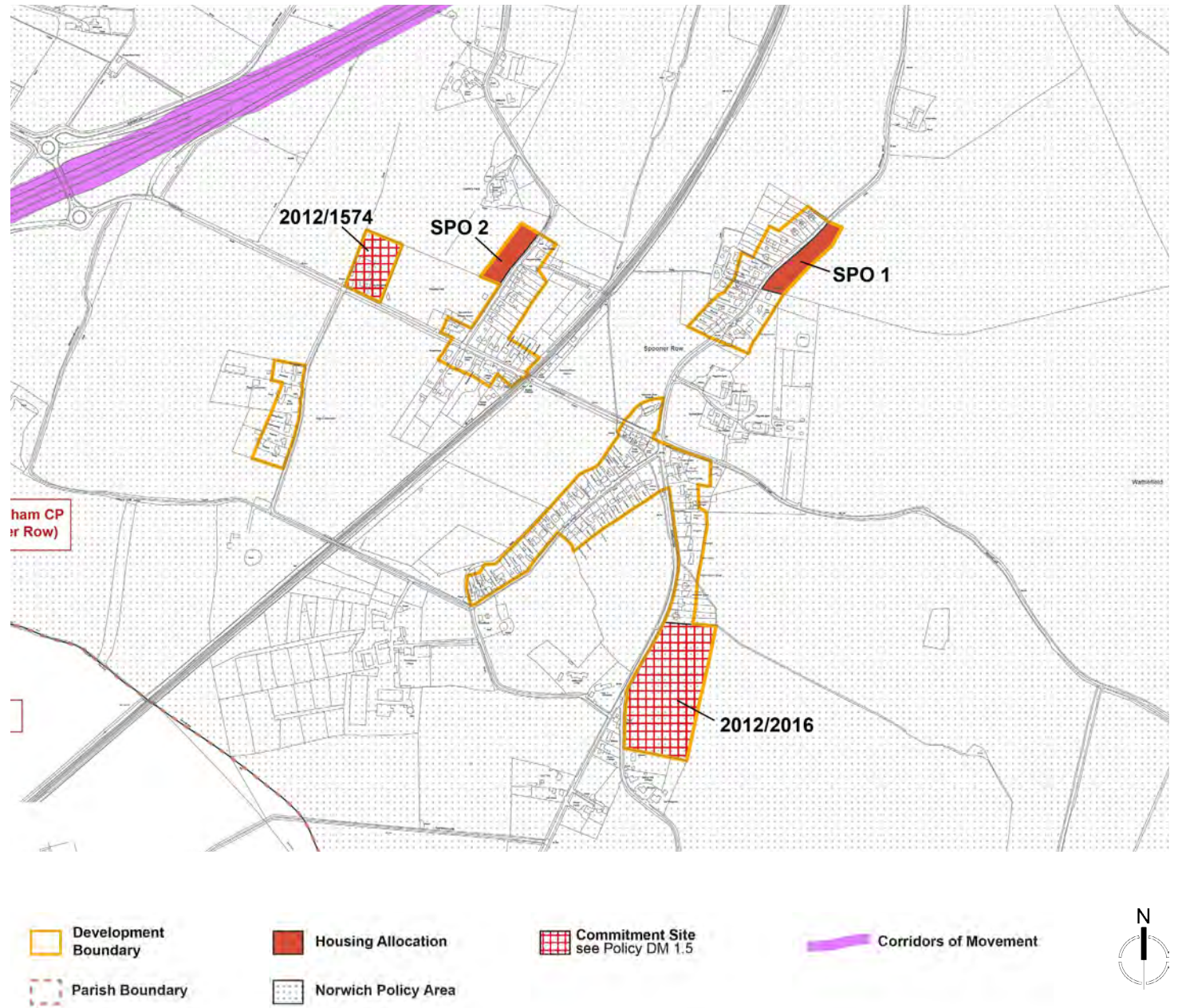
5 YEAR HOUSING SUPPLY

The NPPF (2012) requires Local Planning Authorities to; "ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" and "identify the scale and mix of housing and the range of tenures that the local population is likely to need

over the plan period which meets household and population projections, taking account of migration and demographic change” (paragraphs 47 and 159).

The Council’s 5 year land supply is identified in the 2014/15 Annual Monitoring Report as 4.39 years for the Norwich Policy Area. However, in view of the recent SHMA which has now increased the overall housing requirement by 20%, it is expected that the 5 years supply will now decrease to take into account the additional requirement. It is also recognised that the Liverpool approach is used by the Greater Norwich authorities to calculate their housing supply despite advice within the Planning Practice Guidance (PPG) which states that the Sedgefield approach should be applied. Furthermore, the Councils are now in a position of recognising that there has been persistent under delivery in the NPA, and consequently it may be necessary to apply the 20% buffer. Taking into account the Council’s current position, we anticipate that as a result housing delivery rates will need to increase to address housing market problems.

It is noted that the Council is committed to an early review of the South Norfolk Local Plan, which has already effectively begun with the publication of the SHMA and the current Call for Sites exercise.



3. Village Assessment

EXISTING SETTLEMENT AREAS AND SERVICES

The village is served by a railway station, a primary school, a village hall, a church and a public house which are connected by Station Road within a 400 meter distance section. This service corridor forms a 'village heart'. Currently the village lacks any shop.

The existing settlement areas are present around the 'village heart' within a walkable distance but separated by open space including arable land and the railway.

ROAD CONNECTIONS

Wymondham and Attleborough lie within a 10 minute drive distance. The A11 provides a vehicle connection to Norwich.

PUBLIC TRANSPORT

The railway station and the bus stops are present in the village heart.



PUBLIC HOUSE



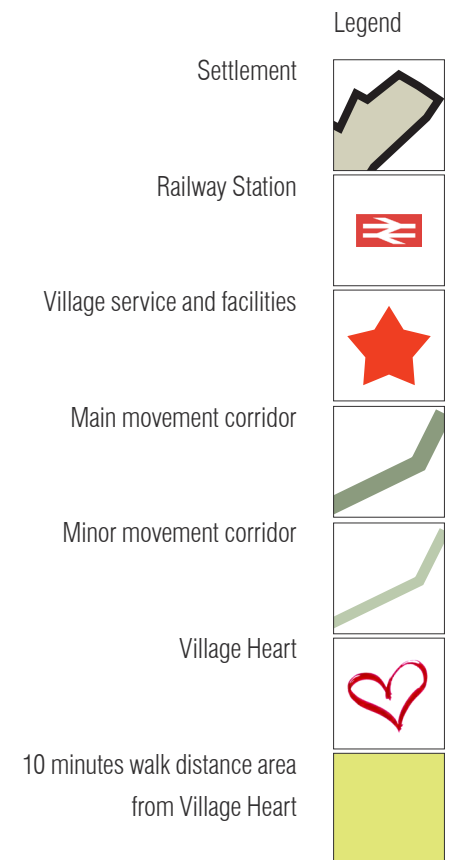
SPOONER ROW PRIMARY SCHOOL

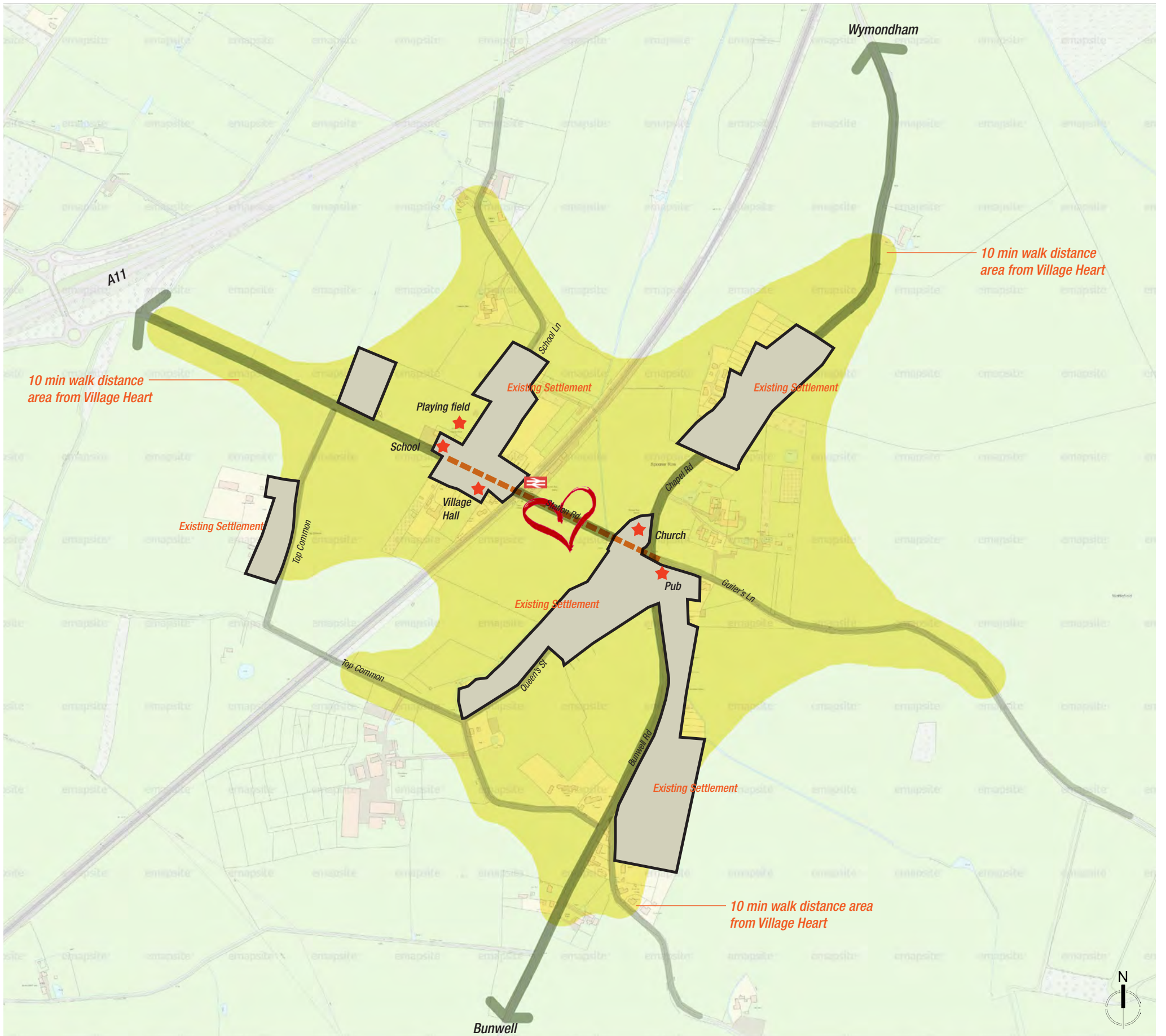


PLAY AREA



TRAIN STATION





EXISTING SETTLEMENT AREAS AND SERVICES

4. Opportunities & Constraints

The village layout presents a number of opportunities for enhancing the amenities and sustainability of the village whilst acknowledging constraints.

The current village heart is well located in the physical centre of the village within a walkable distance with potential for further service facilities such as village shop, new or upgraded village hall, allotment or community orchard and sports ground. The delivery of these could be phased in accordance with the growth of the village

Within the walkable distance, the village presents a number of sites free from major landscape and visual impact concerns or ecological designations.

The Flood Zone across the village needs to be retained as open space. However it has the potential to become public open space and ecological habitat. This would contribute to the character of settlement areas separated by green space.

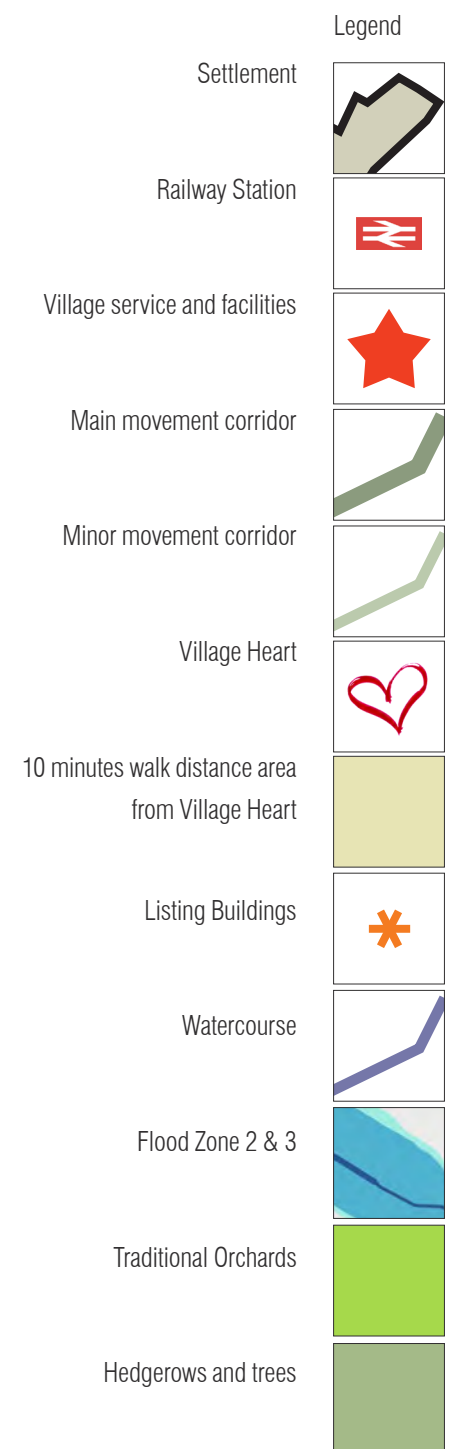
Growth of the village may also promote an increase in public transport provision.

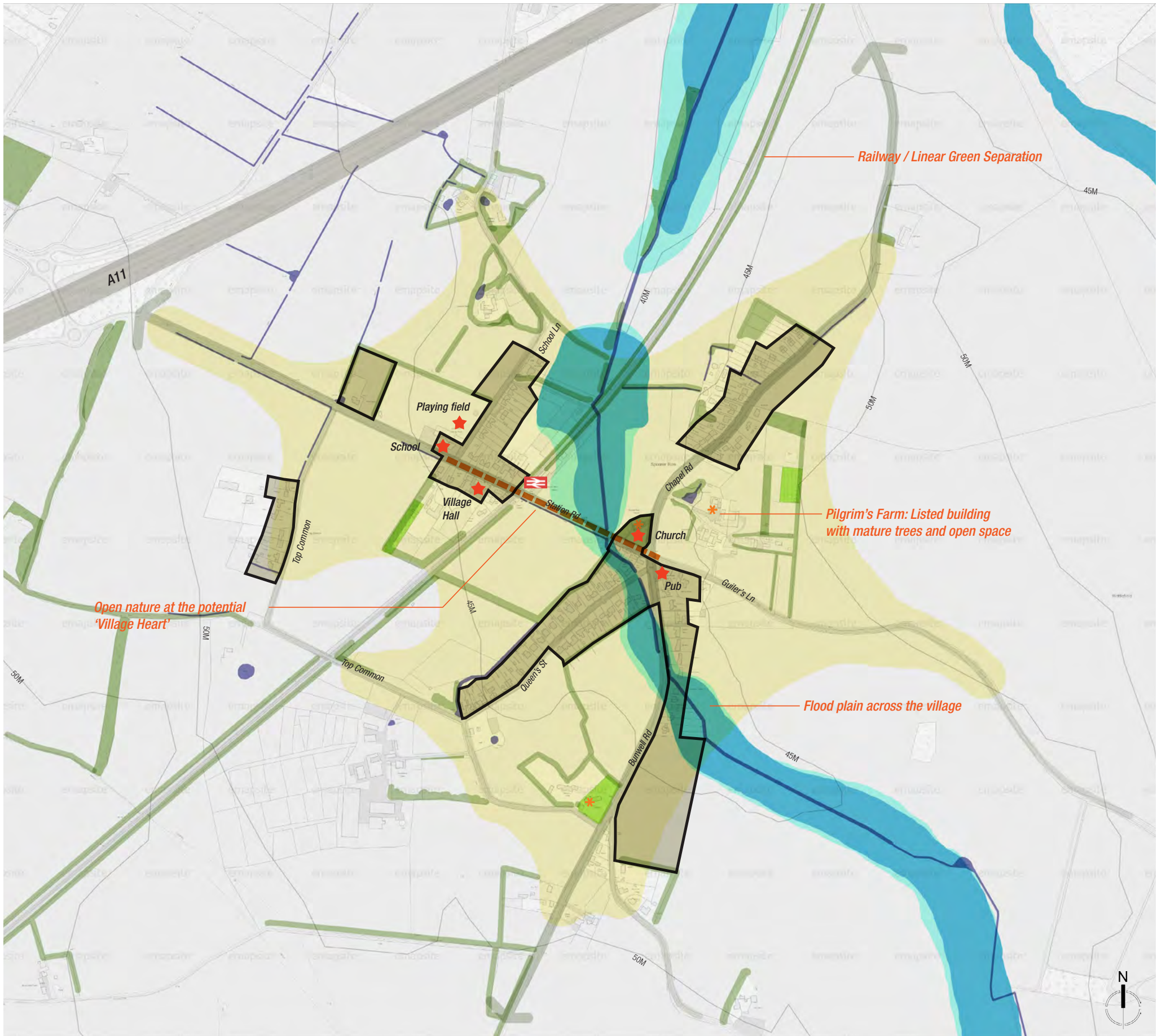


FARM LAND AND SETTLEMENT TO THE SOUTH OF STATION ROAD



RIVER AND FLOOD PLAIN





5. Concept

The concept diagram identifies potential growth areas and safeguarded open space for public use, food production, habitats and flood mitigation within the 'Walkable Village' extent as set out in the Opportunities and Constraints section. The concept is structured mainly by open space strategy as follows:

1. VILLAGE HEART GREEN

The Village Heart Green would keep the open nature of Station Road whilst enhancing footpath connections and adding ecological value to the existing farmland and meadows. Well landscaped attenuation features would add interest to the public open space and biodiversity to the green space.

USE: Public Open Space, Wetland Habitat, Footpath Connection between Station and Chapel Rd, Flood Attenuation Features and Potential car park extension for the station

2. PILGRIM'S FARM GREEN

The Chapel Road frontage of Pilgrim's Farm would stay open to maintain the open character and the visual presence of the listed building to the pub junction. Improved pedestrian space can be provided along the existing hedgerow and Chapel Road.

The open space at the junction corner can provide footpath access and visual presence of a potential village shop (or any other suitable services).

USE: Public Open Space, Flood Attenuation Feature, Grassland and Potential Village shop

3. BUNWELL ROAD MEADOW

The floodplain along the existing watercourse forms a new public open space fronted by existing Bunwell Road houses and potential new development in the southern part of the parcel, providing SUDs features, meadow and small play area with improved footpath connections along Bunwell Road

USE: Public Open Space, Flood Attenuation Feature, Play area

4. COMMUNITY ORCHARD



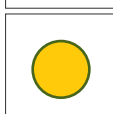

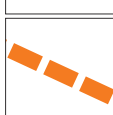

The proposed community orchard would reinforce the settlement gap along the railway green corridor whilst diversifying the use of public open space in the village heart.

USE: Community Orchards and Structural Planting

5. POTENTIAL SCHOOL EXTENSION / ALLOTMENTS

The land to the north of the existing school will be reserved for potential growth of the school and village allotments served from School lane with improvements of the existing lane if required.

USE: School expansion, allotments or potential sports/leisure field.

| Legend | |
|-------------------------------------|---|
| Existing Settlements |  |
| Potential Growth Areas |  |
| Village service and facilities |  |
| Village Shop |  |
| Public Open Space |  |
| Village Heart |  |
| Improved Village Heart Walk |  |
| Minor roads and footpath connection |  |



6. Illustrative Framework

The illustrative framework plan shows the possible development of five parcels, amongst the identified village growth areas. The indicative schedules and land uses are as follows:

PARCEL 1

- Site Area: 3.64 ha
- Net Developable Area: 2.45 ha for residential development
- Public Open Space: 1.19 ha for SUDs, play area and meadow

PARCEL 2

- Site Area: 4.08 ha
- Net Developable Area: 2.16 ha for residential development
- Public Open Space: 1.92 ha for community orchards, SUDs and play area

PARCEL 3

- Site Area: 0.94 ha
- Net Developable Area: 0.45 ha for residential development with a potential village shop
- Open Space: 0.49 ha for public open space and private land kept as open grass land and necessary SUDs features.

PARCEL 4

- Site Area: 6.84 ha
- Net Developable Area: 2.93 ha for residential development
- Public Open Space: 3.91 ha for wetland habitats, flood attenuations features, potential car park for the station

PARCEL 5

- Site Area: 4.13 ha
- Net Developable Area: 1.50 ha for residential development
- Attenuation Green, Potential School Expansion and Allotments: 2.63 ha

- Wetland habitat with footpath/ deck access across 1
- Flood attenuation features 2
- Play area 3
- Community Orchards 4
- New pedestrian space 5
- Meadow 6
- Avenue planting 7
- Station car park 8
- Potential school expansion 9
- Allotments 10
- Retained and enhanced hedges 11
- Proposed hedges and structural planting 12

INDICATIVE SCHEDULE OF ACCOMMODATION

| Parcel | Parcel 1 | Parcel 2 | Parcel 3 | Parcel 4 | Parcel 5 |
|----------------------|-------------|-------------|---------------------|-------------|-------------|
| Total Site Area | 3.64 Ha | 4.08 Ha | 0.94 Ha | 6.84 Ha | 4.13 Ha |
| Net Developable Area | 2.45 Ha | 2.16 Ha | 0.45 Ha | 2.93 Ha | 1.5 Ha |
| Net Density | 18~25 DPH | 18~25 DPH | - | 20~30 DPH | 18~25 DPH |
| Homes | 44~61 Homes | 39~54 Homes | 4~5 Homes plus Shop | 59~88 Homes | 27~38 Homes |





Parcel 5

Parcel 4

Parcel 3

Parcel 2

Parcel 1

8. Technical Background

LANDSCAPE AND VISUAL CONSIDERATIONS

The Site is located within a village which is characterised by separate small scale settlement clusters, divided by the Norwich to Ely railway line and agricultural fields. The Site is covered by published Landscape Character Area B2 Tiffey Tributary Farmland which is noted for its flat to gently undulating landform, small hidden streams and wooded horizons. The Site is also noted as being within a strategically important area, as one of the main points of entry into the South Norfolk District as a result of the existing road and rail infrastructure.

The Site is considered to reflect these published landscape characteristics, being generally flat common place fields, enclosed by trees or hedgerows and with a small hidden stream crossing either side of Station Row road. As a result of the generally flat landform and existing vegetation, the inter-visibility between the Site and the wider landscape is very localised, with views being from close range existing road networks and residential properties, for which there are existing views of built form and the railway line.

The Site therefore provides the opportunity for development as it is well contained from the wider landscape, being enclosed by its low lying position and existing vegetation. The proposed development provides an opportunity to respond positively to published landscape guidelines, including for relating to the scale of the existing settlement patterns to retain the rural character of the village; respect the setting of the Holy Trinity Church and improve access to the stream by enhancing the recreational value of the Site by providing potential linkages adjacent to the stream as part of a high quality multi-functional area of connected green spaces, in an area of existing limited public access. The proposed built form would also reflect the existing scale and mass of existing development within the village, to avoid the introduction of new features which would disturb the visual balance and would be set within a robust landscape framework.

HIGHWAY / TRANSPORT

It is proposed that development on the various sites would have a combination of direct frontage access and simple priority T-junctions onto the local highway network

The internal highway network would be designed in-line with relevant design standards as set out by NCC and SNDC, and in-line with guidance set out within Manual for Streets. Parking would be provide in-line with anticipated demand, and relevant local and regional standards.

Improvements to the pedestrian and cycle network would be provided where possible, improving links to Spooner Row Railway Station.

Improvements to bus facilities and operation would also be considered, with discussions undertaken with local bus operators, NCC and SNDC.

In view of the above we consider that this site is suitable for allocation for a mixed-use development in transport terms.

FLOOD RISK AND DRAINAGE

The masterplan for each site will be carefully devised to ensure that the residential properties are strategically positioned so that they do not conflict with the floodplain extent and are therefore considered to be within the Flood Risk Zone 1 area of the site.

The finished floor levels will be set above the 1:100 year peak fluvial event (including an allowance for climate change) to ensure no flood-water encroachment occurs to any property.

Buffer zones would be provided from the top of the designated main river's banks to ensure future maintenance works can be carried out. Any existing ordinary watercourse/ditches would also be retained where possible or compensatory lengths provided instead to ensure no net loss.

There is no risk of flooding from any nearby reservoir.

A means of dry/safe escape will be available to all residents in the event of an extreme flooding event to enable the occupants to vacate their premises or allow emergency vehicles to access the site.

An application for each of the sites will be accompanied by a detailed site-specific Flood Risk Assessment where the land is designated as being in a Flood Risk Zone 2 and/or 3, or the application area exceeds one developable hectare, to comply with the requirements of the NPPF.

No public sewers will need to be diverted or protected.

A suitable SuDS strategy will be devised which will seek to utilise infiltration drainage techniques or outfall to the designated main river/ordinary watercourse. Each SuDS system will be hydraulically designed to ensure the network can withstand the impact of a 1:100 year rainfall event (including an allowance for climate change). Suitable features such as basins, ponds, swales etc. will be included in the scheme to attenuate the resultant volumes of run-off.

8. Conclusion

Through this Development Framework and Vision it has been demonstrated that the village has potential for growth in terms of residential development with appropriate provision of service facilities and public open space. The growth principles are summarised as follows:

- The growth will be contained within the Walkable Village distance extent.
- The new residential development will form natural extensions to the existing settlement areas.
- The gaps between the existing settlements will be safeguarded by provision of new public open space and habitats.
- Through growth, the village can become a better equipped service village with more diverse village service facilities and high quality public open space.
- The proposed development will utilise water features and flood plains in enhancing

the quality of public open space and biodiversity in green space in the village.

- The proposed development will enhance pedestrian connections across the village.
- The proposed development will reserve space for potential school expansion following the growth of the village.
- Access to the development can be adequately provided without negative impact on the surrounding highway network.
- The identified parcels are considered suitable to accommodate residential development without detriment to the landscape character, features, or visual amenity of the area.
- The development parcels have enough room for flood attenuation features to mitigate flood risks.

This document assesses and illustrates a possible development of multiple sites in the village which could strengthen the village's service and amenity offer. However the individual parcels of land identified for development are capable of being developed independently of each other.

LAND AT SPOONER ROW,
VILLAGE GROWTH FRAMEWORK AND VISION
JULY 2016

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