



CODE Development
Planners



**Position Statement
(GNLP Regulation 18)**

**Land west and east of
Reepham Road,
Norwich**

**Drayton Farms
Limited / RG Carter
Farms Limited**

CONTENTS

EXECUTIVE SUMMARY	3
1 INTRODUCTION.....	4
2 PROPOSED DEVELOPMENT AND COMMUNITY BENEFITS	5
3 SITE OWNERSHIP AND LAND USE	6
4 ACCESS	7
4.1 Existing access	7
4.2 Proposed vehicular access.....	7
4.3 Proposed pedestrian access	9
5 DRAINAGE	10
6 ECOLOGY	10
7 OPEN SPACE AND GREEN INFRASTRUCTURE	12
8 SPORTS AND OUTDOOR RECREATION	13
9 EDUCATION CAPACITY.....	13
10 HEALTH CARE	14
11 REVIEW OF GNLP REGULATION 18 HELAA.....	14
12 GNLP GROWTH OPTIONS	17
13 CONCLUSION.....	18
APPENDIX A ILLUSTRATIVE CONCEPT MASTERPLAN	20
APPENDIX B FACILITIES PLAN	21
APPENDIX C WEST BROADLAND GREEN INFRASTRUCTURE PROJECT PLAN CONSULTATION RESPONSE FORM.....	22

FIGURES

Figure 1 Redline boundary plan	4
Figure 2 Indicative masterplan	6
Figure 3 Proposed vehicular access locations.....	8
Figure 4 Horsford and Hellesdon facilities plan.....	9
Figure 5 Identified ecological constraints	11

TABLES

Table 1 Land west of Reepham Road HELAA assessment	15
Table 2 Land east of Reepham Road HELAA assessment	16

EXECUTIVE SUMMARY

This Position Statement provides further details for two specific sites previously submitted in the Greater Norwich Local Plan 'call for sites' exercise. The sites are located immediately to the east and west of Reepham Road largely within the parish of Horsford and partly within the parish of Hellesdon.

The development sites are being promoted as a single masterplan where the area could be comprehensively planned and economies of scale would allow the delivery of greater community benefit. An alternative approach might involve the allocation of individual elements.

The land to the west of Reepham Road could accommodate between 250-300 dwellings, with the land to the east providing an additional 600-700 units, including areas of open space and a small area of commercial land located at Manor Farm adjacent to the Norwich Northern Distributor Road.

The masterplan could significantly enhance the on-site green infrastructure network and with a holistic approach to the development of the area, provide substantial improvements to off-site links. This would contribute towards the delivery of important elements of the West Broadland Green Infrastructure Project Plan, as well as Neighbourhood Plan objectives in relation to green space access.

Green links created could connect the existing Horsford Cricket Ground and the Community Sports Foundation 'NEST' sports and leisure complex with the wider pedestrian network, linking to Hellesdon, Horsford and Drayton.

Initial assessments for access, drainage and ecology have been undertaken which inform this document. Both sites have also been assessed within the Housing and Economic Land Availability Assessment. This found each site to be suitable for the promoted uses, however it is noted that the redline boundaries have been expanded since the initial 'call for sites' submission. Comments made within the Housing and Economic Land Availability Assessment and the accompanying Site Proposals Document have been addressed within Section 11, providing a commentary on how these will be incorporated into site design and/or mitigated.

The masterplan could deliver up to 1,000 new homes within the Norwich fringe, being a highly sustainable location served by local facilities and transport links. The development would bring significant benefit to the local communities of Hellesdon, Horsford and Drayton through the delivery of open spaces and enhancements to the wider green infrastructure network. The green infrastructure objectives which form a significant part of the masterplan are therefore aligned with those set out in the Greater Norwich Local Plan Sustainability Appraisal, the West Broadland Green Infrastructure Project Plan and the Horsford and Hellesdon Neighbourhood Development Plans.

1 INTRODUCTION

- 1.1 On behalf of the landowners (Drayton Farms Limited and RG Carter Farms Limited), CODE Development Planners Limited have submitted various responses to the relevant broad planning strategy for the area and thematic strategic policies for growth contained in the Greater Norwich Local Plan (GNLP) Regulation 18 consultation (08 January – 22 March 2018). Part 2 of this document summarises these relevant responses where relevant to these site proposals.
- 1.2 In addition, the document provides further detail on two specific sites previously submitted in the 'call for sites' exercise. The sites are located immediately to the east and west of Reepham Road largely within the parish of Horsford and partly in the parish of Hellesdon. They are located directly adjacent to the existing built up area of Hellesdon and the site to the east of Reepham Road also has a frontage to Cromer Road.
- 1.3 Figure 1 below illustrates the proposed redline boundaries for each site:

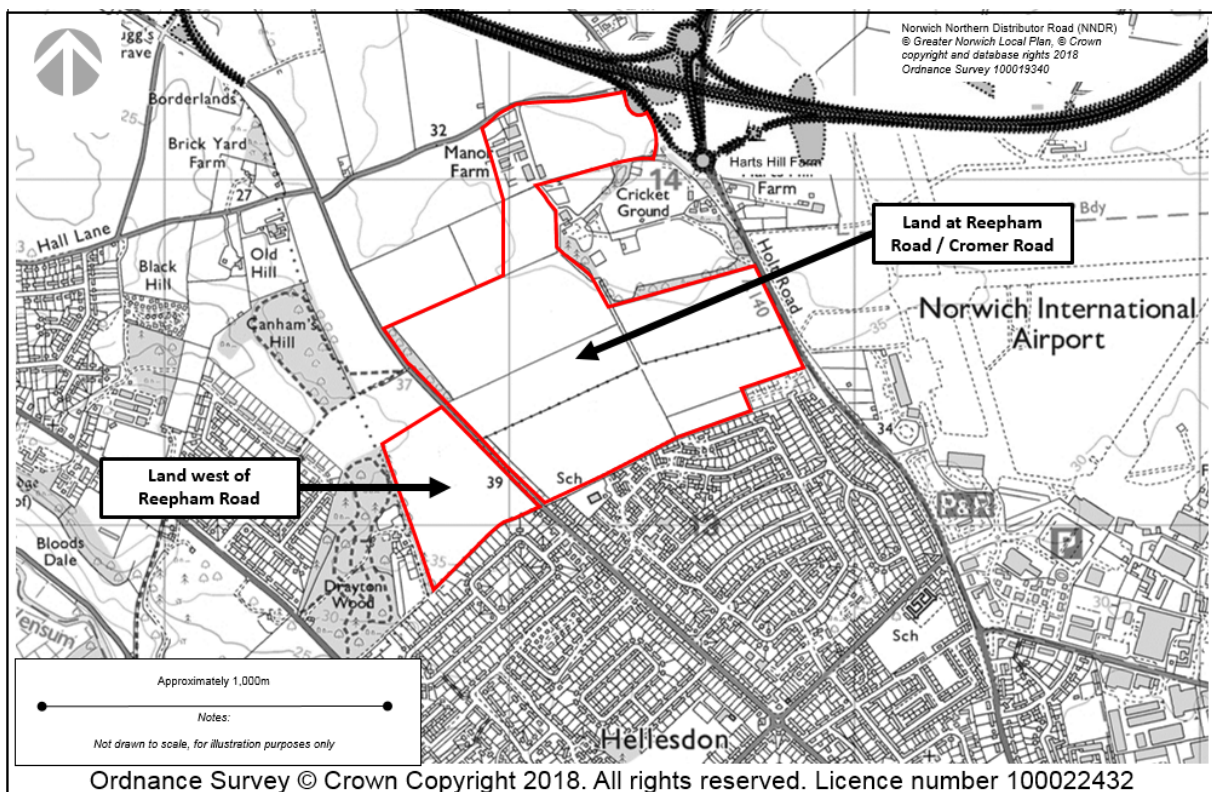


Figure 1 Redline boundary plan

- 1.4 The land west of Reepham Road (an extension of the previously promoted site GNLP0334) measures approximately 11.5ha / 28.5 acres, and land to the east of Reepham Road / west of Cromer Road (an extension of the previously promoted site GNLP0332) measures approximately 62 ha / 153 acres.

- 1.5 Following discussions with planning officers at Broadland District Council concerning the potential for the sites to contribute towards meeting the Objectively Assessed Housing Need (OAHN), to deliver an existing allocation on part of the site for recreational open space (HEL4) and to deliver additional improvements to green infrastructure networks within the immediate and surrounding area, further assessment of site capacity has been undertaken. The assessments have had particular regard to the policies and opportunities identified in the Hellesdon and Horsford Neighbourhood Plans and West Broadland Green Infrastructure Project Plan (Jan 2018).
- 1.6 Further possible opportunities to incorporate expanded and improved access to the Norwich City Community Foundation facility 'NEST' have also been discussed direct with the Community Foundation. Further assessments and discussions will take place as matters progress in the local plan process.

2 PROPOSED DEVELOPMENT AND COMMUNITY BENEFITS

- 2.1 The development sites are being promoted as a single masterplan where the area could be comprehensively planned and economies of scale would allow the delivery of greater community benefit. An alternative approach might involve the allocation of individual elements.
- 2.2 The land to the west of Reepham Road could have an indicative capacity of between 250-300 new dwellings¹. The proposed development could provide within the site an extension to the existing green infrastructure network, introducing new wildlife corridors which contribute towards the 'green grid' identified within the Hellesdon Neighbourhood Development Plan (NDP), also enhancing community access to the countryside, woods and green spaces as identified within the Horsford NDP. The green grid could be enhanced along the southern site boundary with the existing settlement, providing improved pedestrian access to Drayton Wood, Canham's Hill and the wider off-site green infrastructure network which links with Marriotts Way and the River Wensum Valley Green Corridor.
- 2.3 The development could also provide a section of green corridor ('Greenway') along Reepham Road as set out within Broadland District Council's 'West Broadland Green Infrastructure Project Plan (Jan 2018)'. Proposed green infrastructure links located in and around the sites should be comprehensively planned together with a view to extending and enhancing access to the existing network.
- 2.4 The land to the east of Reepham Road could have an indicative capacity of between 600-700 new dwellings including areas of open space and having the potential for a small area of commercial land located at Manor Farm adjacent to the Norwich Northern Distributor Road (NNDR)².

¹ This scale of development has been identified by the GNLP team (during viability workshops) as being the 'sweet spot' for housing development, with new policy mechanisms being required to encourage such developments (GNLP minutes, 23 March 2017).

² Should Broadland District Council consider an area of commercial allocation to be premature at this stage, the site redline can be reduced omitting this use without detracting from the remainder of the proposal.

2.5 This site could significantly enhance the on-site green infrastructure network and with a holistic masterplan approach to the development of the area provide substantial improvements to off-site links with the delivery of important elements of the West Broadland Green Infrastructure Project Plan. Green links created could connect the existing Horsford Cricket Ground and the Community Sports Foundation 'NEST' sports and leisure complex with the wider pedestrian network, linking to Hellesdon, Horsford and Drayton. The network would enable residents within the parishes to access a range of outdoor recreational activities by foot and bicycle.

2.6 The indicative masterplan is illustrated in Figure 2 below and attached in Appendix A:

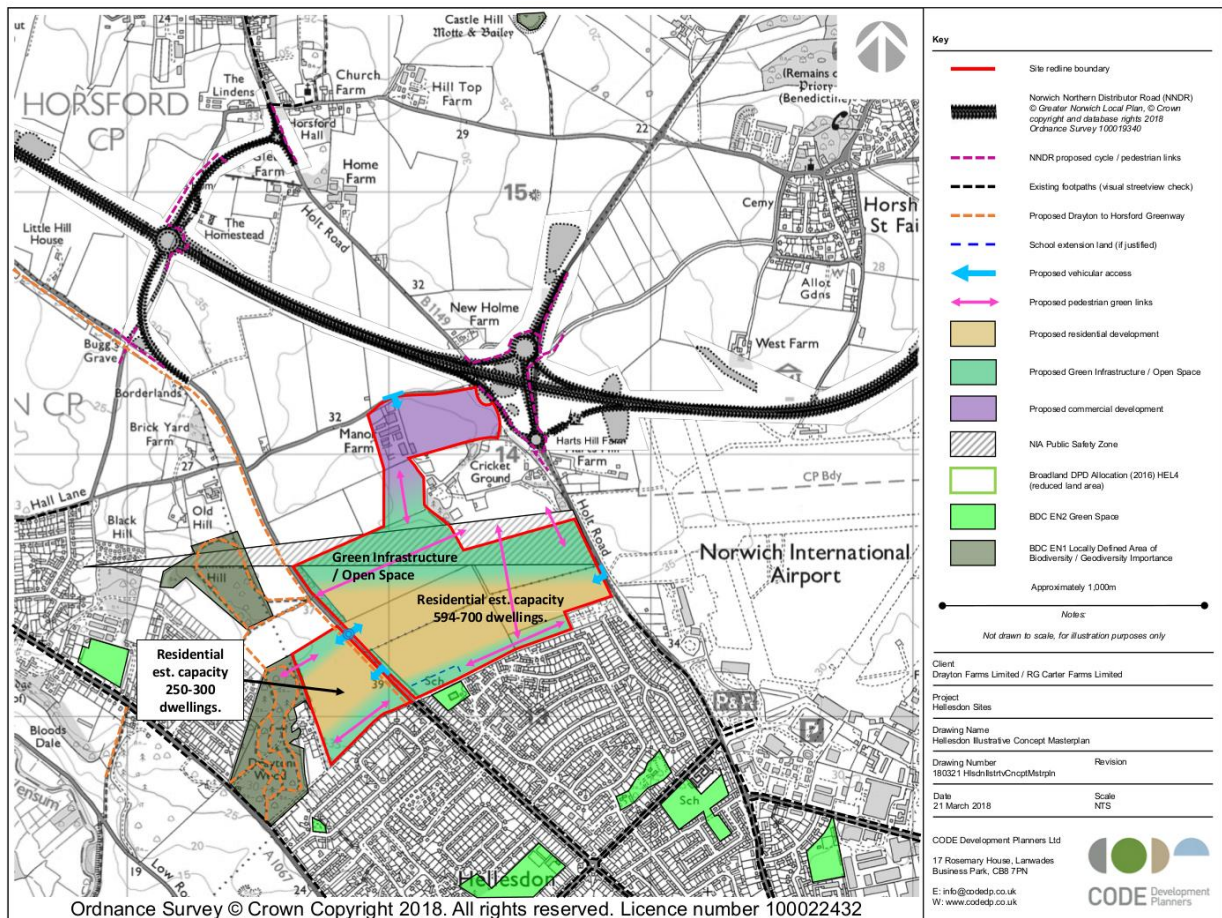


Figure 2 Indicative masterplan

3 SITE OWNERSHIP AND LAND USE

3.1 Both sites, together with surrounding land, including Canhams Hill and links to the wider green infrastructure network are owned by the clients and used for arable farming. The land has been in agricultural use and under the same ownership for many years.

- 3.2 An area of land measuring 11.9ha located within the eastern land parcel is currently allocated for recreational open space (HEL4) within the Broadland DPD Allocations document (May 2016). Part of this allocation has already been grassed and made available for public access through an arrangement with Hellesdon Parish Council. Any subsequent master plan for the sites would be expected to retain or replace elsewhere on the site this existing facility. The land lies directly adjacent to Arden Grove Infant and Nursery school which may require expansion as part of any comprehensive development in the area.

4 ACCESS

4.1 Existing access

- 4.1.1 Vehicles currently access Manor Farm via Holly Lane. There are no other public vehicular access points at either site. Agricultural machinery currently gain access to the land via field entrances to undertake farming activities.
- 4.1.2 A review of Ordnance Survey 1:25,000 scale mapping sources did not identify any Public Rights of Way (PRoW) within either site boundary, however an extensive network of PRoW Bridleways exist within Drayton Wood and Canham's Hill, linking onto Reepham Road to the east and joining Marriotts Way to the West. These have been identified within the West Broadland Green Infrastructure Project Plan as forming part of the Horsford to Drayton Greenway Project (p.26). This will be discussed in greater detail within the Green Infrastructure section of this position statement.
- 4.1.3 Permissive rights of way exist across parts of the site.

4.2 Proposed vehicular access

- 4.2.1 Technical assessments have been undertaken for each site to determine potential highway access requirements. Viable access strategies for the intended number of dwellings are available at each site, subject to further discussions with Norfolk County Council.
- 4.2.2 The site located to the west of Reepham Road will require two points of vehicular access. The southern access point would require a ghost island right turn lane which is located to correspond with a 34m gap in the trees along the western frontage of Reepham Road. This would minimise the need for tree removal during the necessary road widening, with an additional 3m of land required to the west of the road to accommodate the additional lane.
- 4.2.3 As both sites are being promoted within a single masterplan, the second access point located further to the north along Reepham Road would require a compact roundabout providing dual access for both sites. This would be located to correspond with the existing 140m gap in trees fronting the eastern side of the road. Junction spacing would require further assessment, however the proposed access points are expected to meet best practice requirements.

4.2.4 The site located to the east of Reepham Road will require two major accesses based on the Norfolk Residential Design Guide. The western access onto Reepham Road is as stated above. The Cromer Road access would require a ghost island right turn lane being located to the south of existing landing light infrastructure.

4.2.5 If a small commercial allocation is deemed appropriate within the northern sector of the site, a third but dedicated commercial access would be required onto Holly Lane. A simple T-junction with an adequate kerb radii would be sufficient for this purpose. Vehicles would access the wider road network via Reepham Road.

4.2.6 Proposed vehicular access locations are illustrated in Figure 3 below:

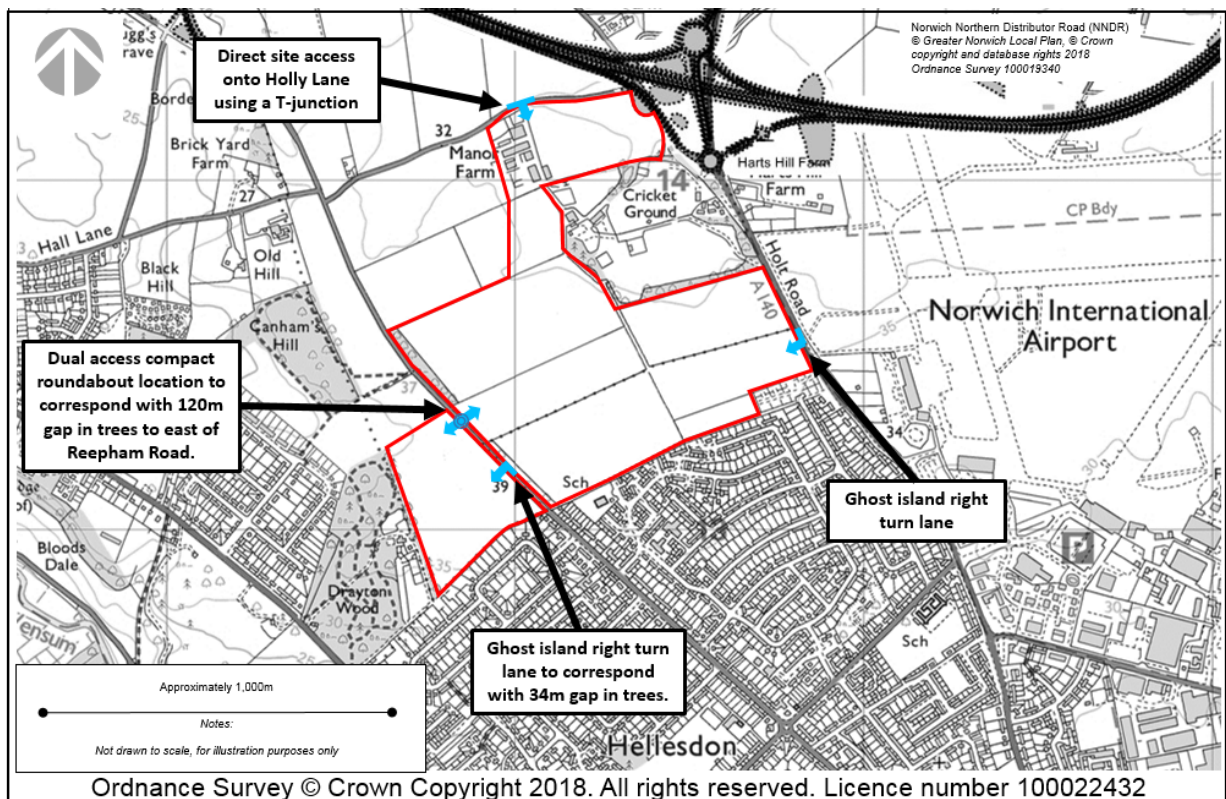


Figure 3 Proposed vehicular access locations

4.3 Proposed pedestrian access

4.3.1 A desk-based assessment has identified local facilities in proximity to the development sites. Various local facilities exist within walking and cycling distance including a selection of shops, schools and medical practices.

4.3.2 Local facilities are illustrated in Figure 4 below together with possible illustrative pedestrian access routes (attached in Appendix B):

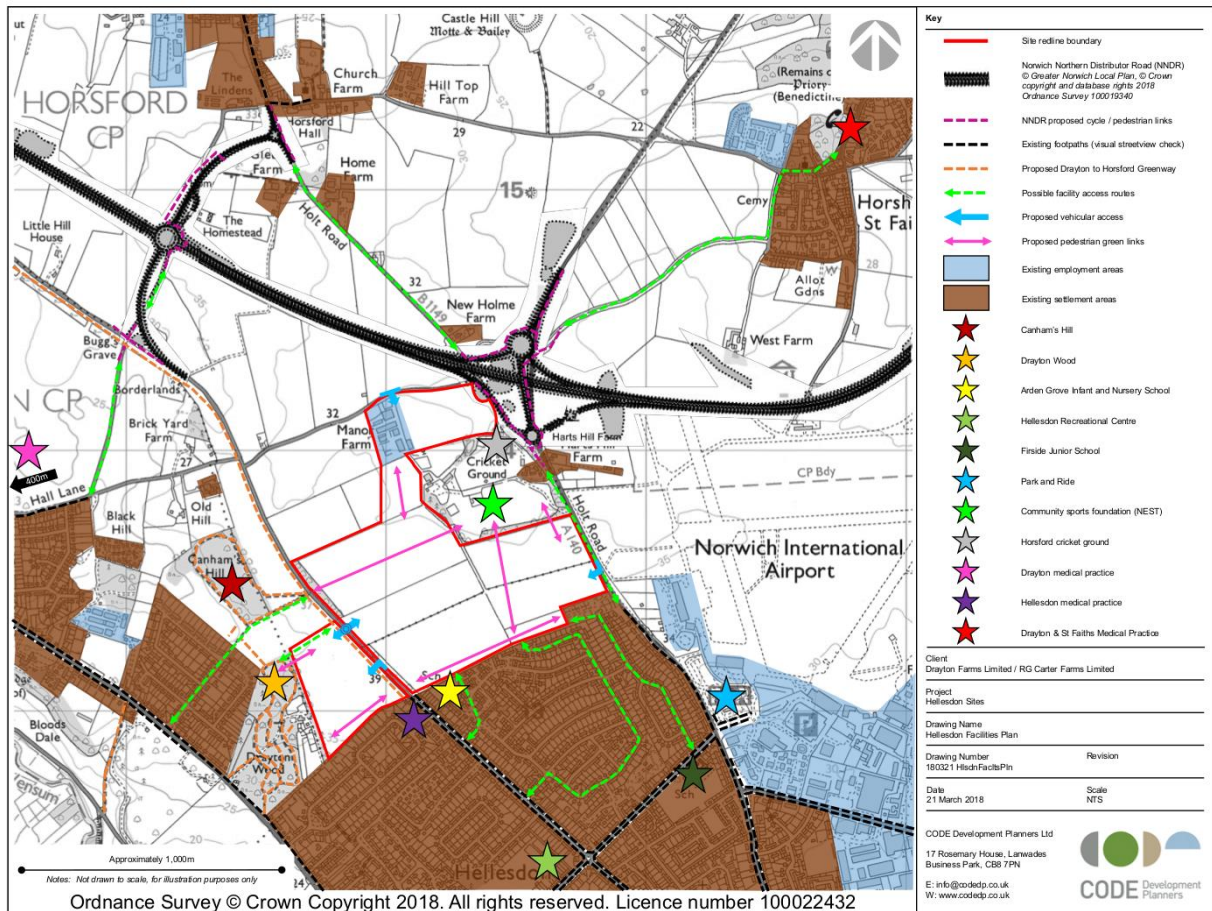


Figure 4 Horsford and Helleston facilities plan

4.3.3 By using existing pedestrian links and proposed enhancements to the greenway network, future residents will be able to directly access local facilities. Site design will incorporate improved access to the public transport network incorporating new bus stops within the development at strategic locations. Encouraging the use of sustainable modes of transport is supported by the GNL Regulation 18 'Interim Sustainability Appraisal' within Section 3 'Sustainability Issues' (p.14). This also states that development should be located where transport options are not reliant on private car usage (p.14).

- 4.3.4 The Community Sports Foundation have also expressed an interest in having a new bus stop located in close proximity to their southern boundary. This is expected to encourage local people who live further afield to utilize the NEST facility without requiring a car.
- 4.3.5 Encouraging local people to walk and cycle is a priority within the masterplan which promotes health and well-being for local residents. Developer contributions will be used to deliver significant enhancements to local network links and green infrastructure / open space areas, incorporating recreational links aligned with the Community Sports Foundation's activities.

5 DRAINAGE

- 5.1 Initial surface water drainage assessments have been undertaken for parts of the land. They have concluded that the sites are unlikely to be susceptible to flooding and that a satisfactory surface water drainage strategy can be implemented.
- 5.2 A self-contained surface water drainage strategy has been identified for the sites based upon national guidance on Flood Risk published by the Department for Communities and Local Government (DCLG) and the Norfolk County Council Lead Local Flood Authority (LLFA).
- 5.3 The site's topography falls in a north-northeasterly direction, with the most elevated point at 40m above ordnance datum (AOD) located to the south west and the least elevated point being located to the north-east at 35m AOD. The site is relatively flat in appearance and is understood to have favourable ground conditions for surface water infiltration.
- 5.4 The permeability rate for the area is likely to be favourable and a viable SuDS strategy could be implemented. By treating the water for quantity and quality on-site, no detrimental effects downstream are expected.
- 5.5 The self-contained surface water drainage strategy will utilize permeable paving and soakaways for the drives and private roof areas with swales and/or infiltration features for highway water. Soakaways and infiltration devices can be placed under paved areas or within landscaping features within commercial plots.
- 5.6 On-site drainage for plots will be self-contained meaning that no additional storage for surface water will be required.

6 ECOLOGY

- 6.1 A Preliminary Ecological Assessment and species survey has been undertaken for both sites.
- 6.2 Assessment for the land west of Reepham Road found evidence that nesting birds and foraging bats use Canham's Hill and Drayton Woods. These may be disturbed during construction activities, and unmitigated street lighting may also disrupt bat activity along hedgerows. Site boundaries are also expected to provide shelter and foraging opportunities for hedgehogs.

6.3 Assessment of the land east of Reepham Road identified areas of broadleaved semi-natural woodland along the roadside, with another small isolated parcel to the northeast of the site. Both areas are believed to provide a habitat of principal importance for local species. In addition to this, a mix of lesser constraints were identified which correspond with hedgerows, ditches and field boundaries within the site.

6.4 It was found that hedgerows were species poor in places, however it is believed that these offer nesting habitats for protected bird species. Bats and hedgehogs are also believed to forage along hedgerows. It is therefore recommended that hedgerow removal is avoided where possible as this would be detrimental to local biodiversity. Hedgerows will therefore be retained or enhanced where possible within the evolving masterplan. The pond located to the northeast of the site is believed to provide habitat for the Common Toad and is a foraging area for bats.

6.5 Identified ecological constraints are illustrated in Figure 5 below:

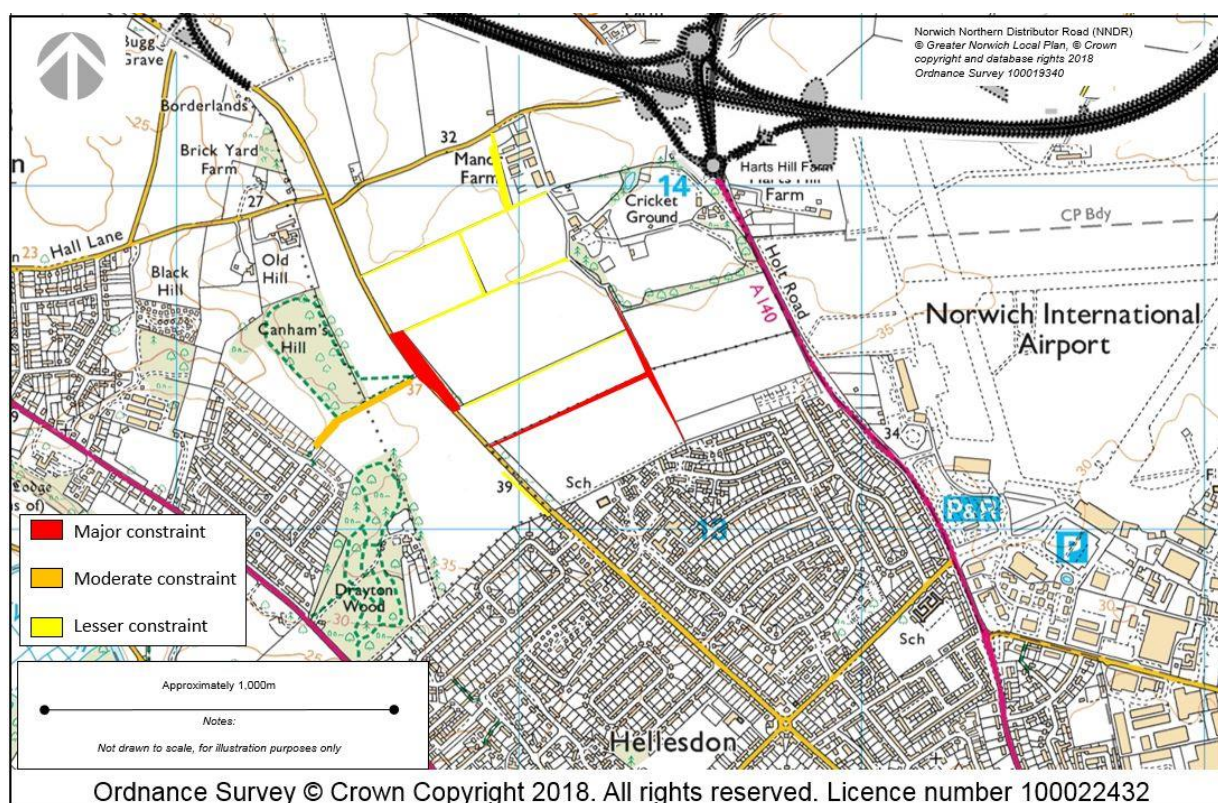


Figure 5 Identified ecological constraints

6.6 A suite of further works has been proposed by the ecologist in order to identify suitable positive mitigation strategies and take the opportunity to deliver substantial improvements to biodiversity on the sites and in the area.

7 OPEN SPACE AND GREEN INFRASTRUCTURE

- 7.1 A review of Broadland District Council's DPD Development Management Policies document (2015) has been undertaken to identify the likely requirement for open space and green infrastructure areas based on the expected dwelling numbers at each site.
- 7.2 The sites form part of a collective masterplan resulting in land area requirements being considered cumulatively. Requirements identified for the land west of Reepham Road could therefore be met within the site redline for the land to the east of Reepham Road.
- 7.3 The comprehensive development of the sites affords the opportunity to deliver a range of open space, green infrastructure, areas of play and sports fields to meet identified needs. This would retain flexibility to offer contributions in lieu of sports facilities and off-site footpath improvements in lieu of on-site Green Infrastructure.
- 7.4 Discussions with planning officers will be required to determine the preferred location for such provision, noting the possibility to relocate part of the existing HEL4 allocation to the north of the site or provide other appropriate space mitigation. This will enable the use and function of land to be optimised in conjunction with the neighbouring uses of the Community Sports Foundation site.
- 7.5 The West Broadland Green Infrastructure Project Plan (January 2018) identifies opportunities to enhance and develop green infrastructure for the benefit of residents and wildlife, seeking to enhance local recreational opportunities and to establish new and accessible green spaces at a local level.
- 7.6 Residential development on land east and west of Reepham Road could secure the necessary funding for the delivery of greenway infrastructure located throughout masterplan areas, realising some of the aspirations set out by Broadland District Council within the plan. Green corridors could link with the existing network within the parishes of Hellesdon, Horsford and Drayton. Pedestrian routes, cycleways and wildlife corridors could be provided offering greater connectivity for residents within the parishes.
- 7.7 The Interim Sustainability Appraisal acknowledges the importance of maintaining and enhancing green infrastructure links to the countryside and semi-natural open spaces, encouraging physical activity and mental well-being for local residents (Section 3, Sustainability Issues - Health benefits for GI, p.13). The masterplan will ensure that green infrastructure links are well related to residential areas and connect the western edge of Hellesdon to the wider greenway network. This would contribute towards the objectives set out within the West Broadland Green Infrastructure Project Plan.
- 7.8 Green links introduced as part of the masterplan would also guarantee the delivery of site-bound elements of the Hellesdon Green Grid identified within Policy 1 of the Hellesdon Neighbourhood Development Plan (NDP) 2017. This would enhance pedestrian access links with the River Wensum green infrastructure corridor and is a key objective of the NDP.

- 7.9 The enhancement of green connections is supported by the Greater Norwich Green Infrastructure Strategy (2007) which identifies priority links between the River Wensum, Drayton and Hellesdon/Horsford. The document also designates both sites as a 'Priority Habitat Enhancement and Creation Area'. The current land use at both sites is intensive agriculture which is known nationally to support a lower species diversity compared to more natural landscapes. It is therefore anticipated that proposed enhancements to green infrastructure networks and the introduction of open spaces would create greater ecological diversity within the area, meeting the principles of designation.

8 SPORTS AND OUTDOOR RECREATION

- 8.1 Norwich City Community Sports Foundation are proposing the development of a new multi-purpose community hub in Horsford known as the 'NEST'. The development site is located directly adjacent to the eastern site presenting an opportunity to work with the charity to deliver a unique facility which utilises the green infrastructure and open space areas to be provided within the masterplan.
- 8.2 Broadland District Council and Sport England commissioned an assessment 'Playing Pitch Strategy, Greater Norwich Area, Broadland Action Plan (Final October 2014)' which reviews the existing level of sports provision within the parishes and proposes actions to rectify deficiencies.
- 8.3 This document identifies a need in Hellesdon for a new recreational ground and enhanced football facilities in Horsford, the latter being facilitated by the NEST. It is therefore apparent that outdoor recreational space is needed in or near the Hellesdon settlement boundary.
- 8.4 The masterplan aims to provide green infrastructure and open space in proximity to the NEST development, with enhanced pedestrian and cycleway links to Horsford, Hellesdon and Drayton via greenway links and green corridors.
- 8.5 The Interim Sustainability Appraisal supports this need, stating that it is important to ensure that new development supports active and healthy lifestyles (Section 3, Sustainability Issues, p.14). The local community would therefore benefit from the development proposed within the masterplan, with access links and outdoor recreational space being central considerations in site design.

9 EDUCATION CAPACITY

- 9.1 The land to the east of Reepham Road contains an existing allocation for recreational open space (HEL4), details of which are set out within the Broadland DPD Allocations document (adopted May 2016, p.33). The allocation covers approximately 11.9ha of land and is located directly adjacent to the Hellesdon settlement boundary to the south.

- 9.2 Details for the proposal could include the possibility of accommodating the future expansion of the adjoining Arden Grove Infant and Nursery School. The school forms part of the Hellesdon, Horsford and St Faiths cluster consisting of Firside Junior School, Heather Avenue Infant School, Horsford Church of England VA Primary School, Kinsale Junior School, Kinsale Infant School and St Faiths CE VC Primary School.
- 9.3 Development of the area in the way suggested will inevitably require further assessment of school capacity for primary, secondary and early years education. This will focus on schools within the Hellesdon, Horsford and St Faiths cluster and the neighbouring Taverham cluster.

10 HEALTH CARE

- 10.1 It is understood that while the sites are in reasonably close proximity to existing healthcare practices, there is likely to be a need for increased capacity.
- 10.2 The Interim Sustainability Appraisal states that it is important that Greater Norwich's good levels of health are supported, with a focus on reducing the health gap between different areas and on providing the necessary health services and facilities for a growing and ageing population (Section 3, Sustainability Issues, p.13).
- 10.3 It may therefore be necessary to consider the inclusion of a suitable space within the masterplan to meet this need, or contributions for increased capacity elsewhere.

11 REVIEW OF GNLP REGULATION 18 HELAA

- 11.1 The GNLP Regulation 18 Housing and Economic Land Availability Assessment (HELAA) December 2017 undertook an initial assessment of sites submitted between 16 May 2016 and 31 July 2017. This utilises a red/amber/green (RAG) scoring system to measure individual constraints and impacts associated with proposed development sites. The aim of the document is to identify potential capacity for housing and employment growth across Broadland, South Norfolk and Norwich.
- 11.2 The following summarises the HELAA findings based on additional assessments undertaken on behalf of the landowners.

11.3 Land west of Reepham Road HELAA suitability assessment:

HELAA assessment category	HELAA assessment findings (RAG)	HELAA review comments
Access	Potential access constraints.	Initial access assessment has identified a viable access strategy for the site (set out within Section 4.2).
Accessibility to services	Close to Hellesdon's existing built edge and local services.	The site will extend the settlement boundary to the north and will provide new and enhanced access to facilities for both new and existing residents (set out within Section 4.3 and illustrated in Figure 4).
Utility capacity		
Utilities infrastructure		Further assessment is required but presence of utility infrastructure is anticipated adjacent to the site.
Contamination and ground stability		The site has been in arable production for many years. There is no record of contamination or ground instability.
Flood risk		Initial assessments in the immediate area have confirmed that risks of flooding are likely to be minimal and with satisfactory mitigation (set out within Section 5).
Market attractiveness		The site is located in a highly sustainable location directly adjacent to the built up area of Norwich where existing services and new services can be enhanced and provided through economies of scale and access to prospective customers. The immediate area is attractive to house purchasers and unlike other sectors around Norwich, has not been the focus of recent substantial growth and commitment.
Significant landscapes	Site abuts Drayton Woods Country Wildlife site.	The location of the site adjacent to Drayton Woods CWS and other areas of ecological interest is an advantage due to the ability to protect and enhance ecological interest in the area and provide additional GI access routes in compliance with the West Broadland GI Project Plan (set out within Section 7).
Townscapes		
Biodiversity and geodiversity		
Historic environment		No historic assets are identified.
Open space and GI		The provision of GI corridors and open space areas constitutes a significant part of the proposed masterplan. These areas will deliver enhancements which meet the needs and aspirations of local people (set out within Section 7).
Transport and roads		Initial access assessment has identified a viable access strategy for the site (set out within Section 4.2). The site's location adjacent to Norwich is highly sustainable and can encourage travel by walking, cycling and public transport.
Compatibility and neighbouring uses		The masterplan will introduce enhanced community access routes and green links which will benefit local residents and neighbouring uses (set out within Section 4.3 and Section 7).

Table 1 Land west of Reepham Road HELAA assessment

11.4 Land east of Reepham Road HELAA suitability assessment:

HELAA assessment category	HELAA assessment findings (RAG)	HELAA review comments
Access	Suitable access points are likely to be achievable.	Initial access assessment has identified a viable access strategy for the site (set out within Section 4.2).
Accessibility to services		The site will extend the settlement boundary to the north and will provide new and enhanced access to facilities for both new and existing residents (set out within Section 4.3 and illustrated in Figure 4).
Utility capacity		
Utilities infrastructure		Further assessment is required but presence of utility infrastructure is anticipated adjacent to the site.
Contamination and ground stability		The site has been in arable production for many years. There is no record of contamination or ground instability.
Flood risk		Initial assessments in the immediate area have confirmed that risks of flooding are likely to be minimal and with satisfactory mitigation (set out within Section 5).
Market attractiveness		The site is located in a highly sustainable location directly adjacent to the built up area of Norwich where existing services and new services can be enhanced and provided through economies of scale and access to prospective customers. The immediate area is attractive to house purchasers and unlike other sectors around Norwich, has not been the focus of recent substantial growth and commitment.
Significant landscapes		
Townscapes	Extends Hellesdon northwards towards the NDR.	Extensions and enhancements to greenway corridors will be provided encouraging residents and wildlife to access the wider network between Drayton, Horsford, Hellesdon and the River Wensum.
Biodiversity and geodiversity		
Historic environment		The Broadland DPD Allocations document (May 2016) identifies a Historic Environment Record (HER) feature within the HEL4 allocation. Further investigation may be required.
Open space and GI		The provision of GI corridors and open space areas constitutes a significant part of the proposed masterplan. These areas will deliver enhancements which meet the needs and aspirations of local people (set out within Section 7).
Transport and roads		Initial access assessment has identified a viable access strategy for the site (set out within Section 4.2).
Compatibility and neighbouring uses	Airport Public Safety Zone will reduce the net developable area. Noise from the airport and its associated industries could be an issue.	The masterplan accounts for the Public Safety Zone located beneath the flight path at Norwich International Airport (NIA). Appropriate GI and open space uses could be located beneath this zone in agreement with planning officers and aviation stakeholders (illustrated in Figure 2).

Table 2 Land east of Reepham Road HELAA assessment

12 GNLP GROWTH OPTIONS

- 12.1 The Regulation 18 Growth Options document (January 2018) proposes six housing dispersal options located around Norwich. The options seek to allocate 7,200 new dwellings consisting of a standard approach for 3,900 units and an alternative approach for the remaining 3,300 units.
- 12.2 Questions set out within the Growth Options Document have been reviewed and comments are provided on the Regulation 18 consultation 'General Response Form' which accompanies this Position Statement.
- 12.3 We largely support the broad strategic approach set out in paragraphs 4.1 to 4.7. The strategy recognises the need to align delivery of jobs, homes and infrastructure and make the most of opportunities for economic and housing growth made available by recent infrastructure improvements and existing strengths of the Norwich area.
- 12.4 We particularly support the specific drive for economic growth in proven sectors already active in the Norwich area (paragraph 4.2). These include those aviation related industries concentrated around Norwich Airport. Although the delivery of some of the existing allocations around the airport have been delayed, the completion of the new strategic infrastructure project of the Norwich Northern Distributor Road (NDR) is likely to give the area and its contribution to economic and housing growth a necessary boost. In cases close to the strategic employment locations it is worth considering the opportunities which might be afforded to smaller and medium sized businesses to locate in close sustainable and symbiotic proximity to the principal destination and economic attractor. Proposals for a comprehensive form of development on land located between Reepham Road and Cromer Road, Horsford, Hellesdon and immediately to the west of the Airport could accommodate such uses in a highly sustainable manner.
- 12.5 The aligned strategy of providing housing to support the economic growth opportunities of the area is welcomed together with its recognition that planned growth should be focussed in and around Norwich supporting the area's regional, national and international economic functions and in the suburbs and fringe parishes providing growing sustainable communities. Such an approach is in accordance with government advice contained in the National Planning Policy Framework (NPPF) for sustainable development.
- 12.6 We also support the strategy focus on delivery as a key to the success of the plan (paragraph 5.1). The plan must avoid the mistakes of the past where sites in inappropriate locations, often not sustainable and in areas which are not favoured by the market or supported by adequate infrastructure are allocated and other more appropriate and deliverable sites are rejected.
- 12.7 Having considered a wide range of complementary factors related to the achievement of the plan's vision and broad strategic approach we believe that each of the stated options have both strengths and weaknesses. However, none of them present an ideal option for growth.

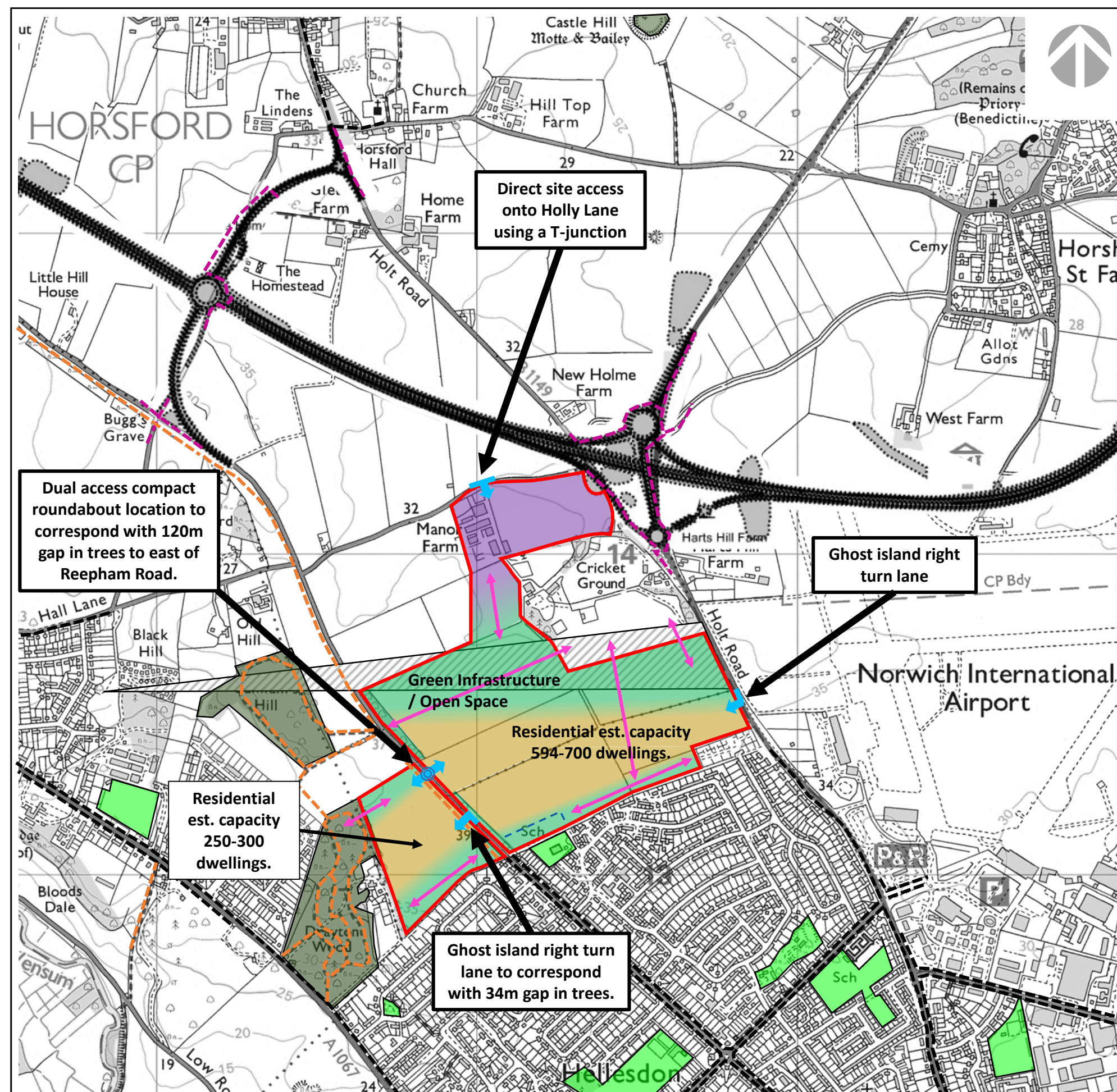
- 12.8 The selected strategic growth option must be designed to provide the best opportunity to achieve the plan's vision and broad strategic approach as detailed on pages 17 and 19 of the Growth Options Document. The key elements to the success of the plan include identifying suitable sites in the most sustainable locations, closely related to existing and improved strategic infrastructure, aligned to the aims of economic growth and with the greatest likelihood of deliverability.
- 12.9 While there will inevitably be a mix of dwelling numbers to be targeted towards various sectors, Main Towns, Key Service Centres and Other Villages, it is important to ensure that homes are targeted to those areas most sustainable, deliverable and supportive of economic growth (all key drivers in achieving the vision and strategic approach of the plan).
- 12.10 An alternative growth option is suggested which targets a higher number of homes to North/North West Sector and encourages appropriate numbers in other areas and reduces numbers in those areas which are less sustainable, have insufficient land or cannot be sure of an ability to deliver high numbers of homes in the plan period.

13 CONCLUSION

- 13.1 The development sites are being promoted as a single masterplan where the area could be comprehensively planned and economies of scale would allow the delivery of greater community benefit. An alternative approach might involve the allocation of individual elements.
- 13.2 The masterplan could significantly enhance the on-site green infrastructure network and with a holistic approach to the development of the area, provide substantial improvements to off-site links. This would contribute towards the delivery of important elements of the West Broadland Green Infrastructure Project Plan, as well as Neighbourhood Plan objectives in relation to green space access.
- 13.3 Green links created could connect the existing Horsford Cricket Ground and the Community Sports Foundation 'NEST' sports and leisure complex with the wider pedestrian network, linking to Hellesdon, Horsford and Drayton. Further possible opportunities to incorporate expanded and improved access to the Norwich City Community Foundation facility 'NEST' have also been discussed direct with the Community Foundation. Further assessments and discussions will take place as matters progress in the local plan process.
- 13.4 Initial access, drainage and ecological assessments have been undertaken which inform this document. Both sites have also been assessed within the Housing and Economic Land Availability Assessment (HELAA). This found each site to be suitable for the promoted uses, however it is noted that the redline boundaries have been expanded since the initial 'call for sites' submission. Comments made within the HELAA assessment and accompanying Site Proposals Document have been addressed within Section 11, providing a commentary on how these will be incorporated into site design and/or mitigated.

- 13.5 The masterplan will deliver up to 1,000 new homes within the Norwich fringe, being a highly sustainable location served by local facilities and transport links. The development would bring significant benefit to the local communities of Hellesdon, Horsford and Drayton through the delivery of open spaces and enhancements to the wider green infrastructure network. The green infrastructure objectives which form a significant part of the masterplan are therefore aligned with those set out in the Greater Norwich Local Plan Sustainability Appraisal, the West Broadland Green Infrastructure Project Plan and the Horsford and Hellesdon Neighbourhood Development Plans.
- 13.6 Additional work is required to assess precisely what community benefit is desired, required and appropriate. Discussions with planning officers and public consultation will therefore closely follow Regulation 18 submission.

APPENDIX A ILLUSTRATIVE CONCEPT MASTERPLAN



Key

	Site redline boundary
	Norwich Northern Distributor Road (NNDR) © Greater Norwich Local Plan, © Crown copyright and database rights 2018 Ordnance Survey 100019340
	NNDR proposed cycle / pedestrian links
	Existing footpaths (visual streetview check)
	Proposed Drayton to Horsford Greenway
	School extension land (if justified)
	Proposed vehicular access
	Proposed pedestrian green links
	Proposed residential development
	Proposed Green Infrastructure / Open Space
	Proposed commercial development
	NIA Public Safety Zone
	Broadland DPD Allocation (2016) HEL4 (reduced land area)
	BDC EN2 Green Space
	BDC EN1 Locally Defined Area of Biodiversity / Geodiversity Importance

Approximately 1,000m

Notes:
Not drawn to scale, for illustration purposes only

Client
Drayton Farms Limited / RG Carter Farms Limited

Project
Hellesdon Sites

Drawing Name
Hellesdon Illustrative Concept Masterplan

Drawing Number
180321 HlsdnlstrtvCnptMstrpln

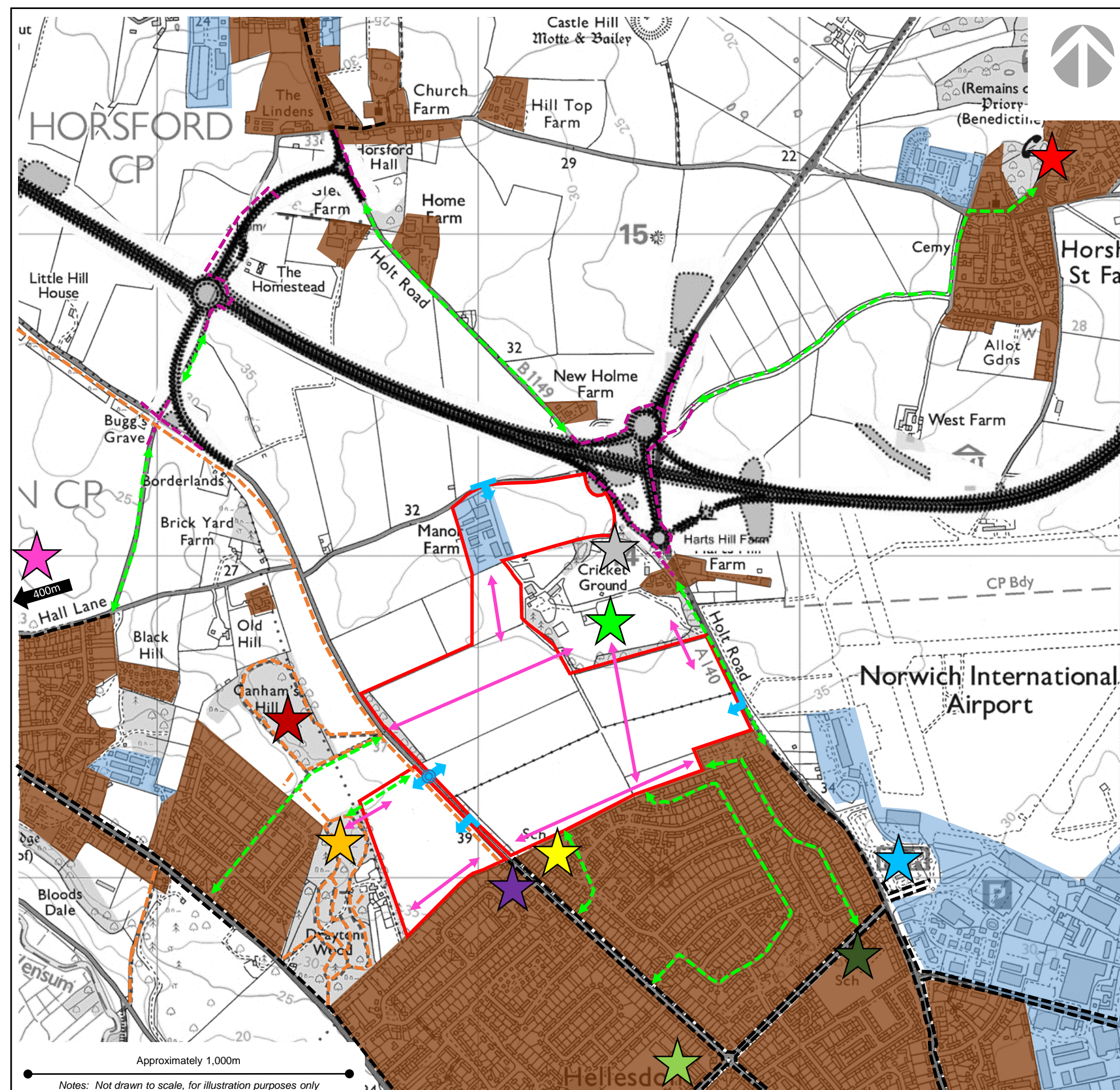
Date
21 March 2018

CODE Development Planners Ltd
17 Rosemary House, Lanwades
Business Park, CB8 7PN

E: info@codedp.co.uk
W: www.codedp.co.uk



APPENDIX B FACILITIES PLAN



- Key**
- Site redline boundary
 - Norwich Northern Distributor Road (NNDR)
© Greater Norwich Local Plan, © Crown copyright and database rights 2018
Ordnance Survey 100019340
 - NNDR proposed cycle / pedestrian links
 - Existing footpaths (visual streetview check)
 - Proposed Drayton to Horsford Greenway
 - Possible facility access routes
 - Proposed vehicular access
 - Proposed pedestrian green links
 - Existing employment areas
 - Existing settlement areas
 - Canham's Hill
 - Drayton Wood
 - Arden Grove Infant and Nursery School
 - Hellesdon Recreational Centre
 - Firside Junior School
 - Park and Ride
 - Community sports foundation (NEST)
 - Horsford cricket ground
 - Drayton medical practice
 - Hellesdon medical practice
 - Drayton & St Faiths Medical Practice

Client
Drayton Farms Limited / RG Carter Farms Limited

Project
Hellesdon Sites

Drawing Name
Hellesdon Facilities Plan

Drawing Number 180321 HlsdnFactsPln	Revision
--	----------

Date 21 March 2018	Scale NTS
-----------------------	--------------

CODE Development Planners Ltd
17 Rosemary House, Lanwades
Business Park, CB8 7PN

E: info@codedp.co.uk
W: www.codedp.co.uk



Notes: Not drawn to scale, for illustration purposes only

APPENDIX C WEST BROADLAND GREEN INFRASTRUCTURE PROJECT PLAN CONSULTATION RESPONSE FORM



West Broadland Green Infrastructure Project Plan - Consultation Response Form

Consultation Response

Please use this form to respond to the consultation on the draft West Broadland Green Infrastructure Project Plan.

If you wish to comment on more than one aspect of the Plan, please use an additional form.

Your responses will not be displayed to the public.

Thank you for taking the time to respond to this consultation.

Please select the section of the document that you would like to comment on from the list below.
(please select one answer)

- Introduction
- Aim and Objectives
- Review of Existing Plans, Strategies and Guidance
- Methodology
- Project 1: Thorpe Marriott Greenway
- Project 2: Drayton to Horsford Greenway
- Project 3: Hellesdon to Drayton Greenway
- Project 4: South Drayton Greenway
- Project 5: Felthorpe Common / Drayton Drewray Site - Enhancements
- Project 6: Horsford Heath / Horsford Woods - Site Enhancements
- Project 7: East Horsford – Connectivity & Circular Walk
- Project 8: Hevingham Park Site - Enhancements
- Project 9: Great Wood, Haveringland - Site Enhancements
- Project 10: Marriott's Way Circular Walks
- General Comment



West Broadland Green Infrastructure Project Plan - Consultation Response Form

Please write your comments in the box below.

We fully support the objectives set out within the West Broadland Green Infrastructure Project Plan.

Our clients (Drayton Farms Limited / RG Carter Farms Limited) own substantial areas of land in an area on which some projects may be appropriate in conjunction with future development.

Drayton Farms Limited / RG Carter Farms Limited look forward to future discussions with Broadland District Council.



West Broadland Green Infrastructure Project Plan - Consultation Response Form

Personal Details

Name (Title, First name, Surname)

Mr Mike Carpenter (Director)

Organisation (if applicable)

CODE Development Planners Limited

Address

17 Rosemary House
Lanwades Business Park
Kentford

Postcode

CB8 7PN

Telephone Number

01223 290138

Email address

info@codedp.co.uk

