

# GNLP Regulation 18 Consultation Response

## GNLP 0526 – Land off High Road, Roydon, IP22 5RB

On behalf of G.N. Rackham and Sons Ltd (hereafter referred to as ‘the Landowner’), we strongly recommend that site GNLP 0526 be allocated for residential development, associated open space and infrastructure. The site is considered to be entirely developable, and capable of making a significant contribution towards satisfying the Councils’ housing needs during the period to 2036.

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

### Assessment of Developability

#### *Suitable*

The site is located within the parish of Roydon, one of the neighbouring parishes of Diss. The Adopted Joint Core Strategy identifies Roydon as a Service Village, suitable for accommodating smaller scale developments up to 20 dwellings. However, there are no existing allocations with the main constraints being the potential impact on the Waveney Valley landscape and avoiding coalescence with neighbouring Diss. Since the publication of the JCS, no other sites within Roydon have been identified for development. Consequently, there is an unmet demand for residential development irrespective of any future growth identified for the village.

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

The site is immediately adjoining the current settlement boundary of Roydon. As such, it will be immediately adjacent to residential development and consequently represents a logical extension to the settlement boundary to the south. The eastern boundary is in line with the current edge of the settlement boundary. The site is well related to a number of services currently offered in Roydon which include a village hall, primary school, petrol station with shop and a pub. Roydon is also located within 1km of Diss, which as a Main Town provides a good range of shops and services, including two supermarkets and schooling up to and including a High School. It is also well connected via existing pathways.

In terms of more detailed site-specific considerations, the Housing and Employment Land Availability Assessment (HELAA) identifies the site as a suitable location for residential development. It confirms through a ‘Green’ rating, that there are no constraints or impacts anticipated in relation to accessibility to

services, utilities infrastructure, historic environment, open space and GI, transport and roads or compatibility with neighbouring uses. Issues which are identified as potential constraints to development are landscape setting, coalescence to Diss and access. These are addressed below.

## **Landscape**

The HELAA identifies that the landscape in the vicinity of the site needs careful consideration in terms of the existing linear development along High Road, the proximity to Roydon fen and that the site is situated within the Waveney Rural River Valley landscape character area. Key characteristics of the area include a relatively large-scale open valley landscape, arable and pastoral farming and diversity of land cover, together with discrete woodland blocks.

This representation is supported by a Landscape Statement and a Townscape Statement, prepared by Hudson Architects. They have used their findings to underpin the indicative proposed layout and design strategies which are also submitted in support of this representation.

The main conclusions of the Landscape Statement are as follows:

- The field to the east of the site should remain un-developed to maintain the gap between Roydon and Diss.
- Existing water tower is a visible landmark so nearby buildings will be restricted in height to maintain views.
- Development near the eastern boundary should be low and set back. The boundary should remain “open” but enhanced with individual trees to enclose the site and contain the development.
- Buildings close to the western boundary should be kept below the height of the trees so they do not break the skyline.
- The southern boundary should be enhanced with trees and low level planting to screen development.

The Townscape Statement identifies the design strategies which could be brought forward on the site and how these will be incorporated into the final scheme. The main conclusions are as follows:

- Vehicular access to the site from High Road should be via the existing gap between bungalows, with a secondary pedestrian/cycle access past the Water Tower.
- The public footpath should be strengthened with new connections to and from the site.
- Existing rear gardens to be protected with regards amenity, privacy and security and the layout should prevent overlooking.
- The final development should respond to both the existing settlement form of Roydon, and to the wider Waveney Valley.

## **Ecology**

The HELAA identifies that the site is within 200m of Roydon Fen Local Nature Reserve and there is the possibility of adverse impact on ecological networks in the area. The Ecological Appraisal undertaken by Hopkins Ecology in support of this Representation, concludes that the likely impacts on the majority of species can be mitigated via appropriate landscaping and scheme design, with the potential to deliver net ecological enhancement.

Most species of conservation concern are scoped-out but widespread declining species including Species of Principal Importance maybe present as components of larger local populations. There will be loss of semi-habitat but it will be low and mitigation via soft landscaping is appropriate. From a strategic viewpoint, such landscape would offer new habitat area potentially relevant to local landscape-scale conservation projects.

The impact of additional numbers of residents and the potential for recreational disturbance to nearby protected areas will be managed through the provision of on-site mitigation as an integral part of the development. Impacts on the nearby Roydon Fen are thought likely to be negligible by virtue of the likely low and absolute and relative numbers of new users. In addition, provision of on-site greenspace with walking routes that are attractive to local residents, particularly dog walkers, will assist in preventing any increased pressure in the vicinity.

The Appraisal concludes that the likely impact on the majority of species can be mitigated through appropriate landscaping and scheme design, which has the potential to deliver a net ecological enhancement.

### **Access**

A review of the access points has been prepared by Richard Jackson Engineering Consultants. This demonstrates that Vehicular access to the site can be achieved from High Road (A1066) with two alternative access options. The favoured option is a current access point off High Road which is between the properties known as Flettons and Linden. This provides a Type 3 access road, taken from the Norfolk Residential Design Guide and can easily accommodate the required visibility splays of 2.4m x 70m without the need for third party land. The alternative option is an access to the east of the site which will propose a 6.0 m wide carriageway with 1.8m wide footways either side of the road. This will involve minor tree, hedge and fence removal but will accommodate the required visibility splays at both 2.4m and 4.5m setback. Both proposed access points would provide safe, effective, vehicular access and egress in accordance with current highway design standards.

The other current access point to the site is situated between the properties known as Owl House and Lynn Haven. This has been identified as a potential pedestrian/cycle link with the site, and provides good sustainable interconnectivity between the existing settlement and the site.

Richard Jackson have also taken the opportunity to review the Utilities on site. There are no known existing utilities apparatus within the site with the exception of a high voltage overhead electricity pole which is unlikely to be affected by the proposed development. With regards proposed utilities required, the assessment concludes that all of the main statutory utility companies can supply the site and that sufficient capacities exist.

With regards flood risk and surface water drainage, the accompanying assessment (prepared by Richard Jackson) concludes that the site is suitable for development. Surface water drainage from the development can be adequately managed in accordance with National and Local Planning Policy and provided the necessary measures are put in place, no detrimental effects from the development would occur downstream.

In conclusion, therefore, it is clear from the above that the site is entirely suitable for residential development. The technical evidence submitted alongside this Representation, demonstrates that there are no constraints to the delivery of the site in a sympathetic manner.

### **Available**

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

### **Achievable**

Based on the suitability assessment above, there are no site-specific constraints which could threaten the delivery of residential development on the site. Therefore, residential development on the site is deemed to be entirely achievable. It is a relatively small site which can be delivered quickly and due to size are

attractive to a range of developers. As a result, there is an opportunity for quick delivery of housing, making a positive contribution to housing delivery.

### ***Viable***

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

### **Summary**

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

Economically, the site represents the right land in the right place at the right time. Residential development here would help support the planned long-term economic growth of the Greater Norwich Area, providing high-quality and desirable homes within easy reach of key employment areas in the town and further afield.

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

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

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