

## GNLP Regulation 18 Stage B Consultation Response

### GNLP2106 – Land South of Taverham Road

On behalf of our client, the Peplow family, we strongly recommend that Land South of Taverham Road is allocated for residential development. The site is, based on technical evidence, considered to be entirely deliverable and developable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2036.

This site was submitted as part of the Regulation 18 Stage A Consultation in March 2018. For the purposes of this consultation, GNLP2106 is considered a 'new' site.

In support of the March 2018 representation, a suite of technical evidence was prepared. This comprised:

- Highways Assessment and Access Proposal Drawing (ref: 48749/PP/SK01), prepared by Richard Jackson Ltd;
- Foul Sewage and Utilities Assessment, prepared by Richard Jackson Ltd;
- Flood Risk and Surface Water Drainage Strategy, prepared by Richard Jackson Ltd;
- Ecological Assessment, prepared by Hopkins Ecology; and
- Indicative Masterplan, prepared by LSI Architects, which demonstrates how a 70-dwelling development could be accommodated on the site.

The site has been identified in the October 2018 Housing and Economic Land Availability Assessment (HELAA) Addendum as 'Suitable'. Whilst this is supportive, much of the technical information submitted in March 2018 has not been incorporated within the HELAA assessment of the site, resulting in certain matters being identified as amber, rather than 'green'. The purpose of this representation, therefore, is to address the 'amber' issues raised within the HELAA assessment and to demonstrate the deliverability of the site.

### HELAA Addendum (2018) Analysis

As mentioned previously, the site has received a preliminary assessment of its suitability for residential development in the October 2018 HELAA Addendum, with most suitability criteria achieving **Green** ratings. These are summarised below:

- **Accessibility to Services and Transport and Roads:** **Green** rated. The site is situated in a very sustainable and accessible location, with all local facilities within walking/cycling distance. The local highway network also has capacity to accommodate residential development at the site.

- **Utilities Infrastructure:** **Green** rated.
- **Contamination and Ground Stability:** **Green** rated.
- **Market Attractiveness and Compatibility with Neighbouring Uses:** both **Green** rated. The site is located within a desirable location to the north of Norwich, and residential uses are compatible with surrounding context.
- **Historic Environment:** **Green** rated. The site is not within the vicinity of any heritage assets.
- **Open Space and GI:** **Green** rated. The development of the site will not result in the loss of open space, and will engender green infrastructure benefits through reinforced boundary planting and landscaping.

Some suitability criteria within the HELAA assessment of the site received **Amber** ratings. These issues are addressed below:

**Access:** **Amber** rated.

The proposed development would be served by a main point of access through property in control of the landowner (No.55, Taverham Road). The type of access required to serve the development needs to be a Type 3 road, which is 4.8m wide with 1.5m footways on both sides, as determined by the Norfolk Residential Design Guide. Richard Jackson's Access Proposal Drawing (48749/PP/SK01) demonstrates that the required access can be accommodated within the site.

Richard Jackson's initial assessment of the potential access location on Taverham Road also demonstrates that adequate visibility of up to 2.4m x 70m can be delivered in both east and west directions.

Furthermore, the proposed development would seek to implement an additional footway/cycle link to the site from Taverham Road. The link would be situated to the north-east of the site, adjacent to No.40 Taverham Road. This link would establish greater connectivity to Taverham Road and the wider settlement. Both accesses will join with the existing footway on Taverham Road.

From this, it is apparent that access by all means to the development can be provided. Accordingly, land South of Taverham Road and the site should receive a **Green** rating in the HELAA.

**Utilities Capacity:** **Amber** rated.

There is a water main to the edge of the site, with capacity likely to serve the development. Similarly, there is a gas main situated next to the site, and connectivity is not anticipated to present an issue. Low and high voltage electricity cables are located in Taverham Road, which can be connected to. It is anticipated that Utilities Capacity around the site can comfortably accommodate the proposed development. Please see the Foul Sewage and Utilities Assessment, submitted in support of the site promotion, for more detail.

From this, it is apparent that Utilities Capacity is not an issue that will prevent the site from being allocated for residential development in the Greater Norwich Local Plan.

**Flood Risk:** **Amber** rated.

The site is entirely situated within Flood Risk Zone 1. In accordance with the HELAA methodology the site should be rated as Green.

To ensure a robust approach and gain more evidence of any flooding implications on site, Richard Jackson Ltd prepared a preliminary Flood Risk Assessment and Surface Water Drainage Strategy to support the March 2018 representation. As part of the assessment, the existing surface water flooding situation has

been investigated. For the events which are for high risk (1 in 30-year return period), medium risk (1 in 100-year return period) there is no surface water flooding on the site and for low risk (1 in 1000-year return period), there is some very minor surface water flooding.

Any run-off flowing across the site as a result of the development could be accommodated by a proposed drainage scheme for residential properties, comprising SUDS/swales demonstrated within the centre of the site on the Indicative Site Plan.

On site SUDS and surface water management systems would also work to protect groundwater in the area. The Groundwater Vulnerability Zone Map shows that the site is covered by a 'High' classification. This classification means that the area can easily transmit pollution to groundwater. As a result, groundwater will need protection via suitable SUDs and surface water management on site, which can be incorporated within the development of the site, as demonstrated within the Indicative Site Plan.

The preliminary Flood Risk Assessment and Surface Water Drainage Strategy concludes that the site is suitable for residential development, as the site is not at risk from surface water flooding or river flooding, and SuDs can be implemented on site to protect groundwater and manage surface water.

From this, it is apparent that there are no issues in relation to flood risk and surface water drainage at Land South of Taverham Road, so the site should receive a **Green** rating.

**Significant Landscapes:** **Amber** rated.

The site is not located in or adjacent to any nationally significant landscapes. The site does, however, lie within the River Wensum Landscape Character Area.

Broadland District Council's Landscape Character Assessment SPD (2013) states that development within the River Wensum LCA should seek to maintain and enhance green corridors. The Indicative Site Plan has adopted a relatively low-density approach to the site (21 dwellings per hectare). This allows for the inclusion of generous landscaped areas as part of the site including a green central landscaped area, informal green space to perimeters, and inclusion of swales and integrated SuDs along roadways. Furthermore, the site is currently screened from Costessey Lane by existing trees and residential dwellings, protecting views out from Marriotts Way.

Therefore, the proposed development would have a neutral impact upon the landscape character of the area, and should be rated as Green.

**Townscapes:** **Amber** rated.

The surrounding townscape is not considered to be sensitive to change. The residential use proposed for the site would relate well to the surrounding context, and Drayton is not situated within any townscape designations.

Therefore, it is considered that the proposed development would have a neutral impact upon the townscape character of the area, and should be rated as Green.

**Biodiversity and Geodiversity:** **Amber** rated.

The site is not within a nationally or internally protected site.

The designated boundary of the River Wensum Special Area of Conservation (SAC) and the River Wensum SSSI is approximately 85m south of the site. It is considered unlikely that recreational impacts

on the River Wensum SAC/SSSI would result from a residential scheme, by virtue of the lack of public access to the valley bottom and bankside areas of the River Wensum SAC/SSSI.

The only County Wildlife Site (CWS) within the vicinity of the site is Marriott's Way, which lies a Euclidean distance of ~245m east of the site. Recreational impacts are thought likely to be negligible, by virtue of the existing use of the Marriott's Way CWS for recreation and existing infrastructure to manage visitors.

On site, a block of young (post-1949) woodland and the boundary hedgerows qualify as Habitats of Principal Importance. The Indicative Site Plan demonstrates that these areas can be retained, and enhanced with further landscaping, as part of a residential development.

The Strategic Ecology Appraisal submitted to support the representation, prepared by Hopkins Ecology, concludes that the site is likely to be of relatively low ecological value, and mitigation for protected species (if present) is feasible and attainable, and the likely impacts on the majority of species can be mitigated via appropriate landscaping and scheme design. Such landscaping could contribute to local countryside projects and initiatives. The mitigation of impacts on the River Wensum SAC and River Wensum SSSI is considered to be feasible via on-Site measures, including scheme design and an appropriate surface water mitigation strategy. Please see the Strategic Ecology Appraisal for more information.

From this, it is apparent that matters relating to biodiversity and geodiversity do not preclude the site from being allocated for development, so the site should receive a **Green** rating.

From this assessment of the HELAA suitability assessment of the site, it has been demonstrated that Land South of Taverham Road does not contain any planning constraints that would preclude residential development, and forms a suitable location for residential development

### **Assessment of Deliverability**

In accordance with the revised NPPF's definition of 'deliverable' and 'developable', the site is available for housing now, offers a suitable and sustainable location for development now, and it is achievable with a realistic prospect that housing will be delivered on the site within five years. In accordance with the definition of 'developable', it is envisaged that the site could be viably developed.

These points are addressed in further detail below.

#### ***Suitable***

The site straddles the parish boundaries of Taverham and Drayton, with the majority of the site falling within Taverham. The site is within close proximity to the centre of Drayton, and its associated services and amenities, and adjoins both Drayton and Taverham's settlement boundaries.

Both Taverham and Drayton are designated as Fringe Parishes within the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), and the GNLP Site Proposals Document notes that both settlements have a good range of facilities.

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, Norwich and the Fringe Parishes (of which Taverham and Drayton are two), will need to accommodate a minimum level of growth of 1,700 units, irrespective of which of the six growth options is identified. On this basis, Taverham and Drayton are locations that are, in principle, a suitable location for additional development

**Available**

The site is within the ownership of one family. All members of the family have consented to the promotion of this site through the Greater Norwich Local Plan process. The site is not restricted by any leases or restrictive covenants. Therefore, the site is readily available for development.

**Achievable**

The site has received considerable market interest from housebuilders and land promoters. They have recognised that the site is an ideal size for a housebuilder, enabling the delivery of development within a short timeframe.

Paragraph 68 of the National Planning Policy Framework (NPPF) recognises that medium sized sites, such as Land South of Taverham Road (3.287ha), can make an important contribution to meeting the housing requirement of an area, as they are often built out relatively quickly.

In addition, the site has potential to be delivered either in isolation or as part of a wider development with the adjacent site (Reference: GNLP0270).

**Viable**

Development of the site for residential purposes is considered viable, taking into consideration the various known policy requirements in relation to matters such as affordable housing provision and CIL contributions. Should it be required, further evidence on viability can be provided at the appropriate time in the planning process as necessary, in accordance with the NPPF and associated Planning Policy Guidance on Viability (24 July 2018).

**Summary**

As outlined above, the site is suitable, available, achievable and viable, and is therefore deliverable.

It has been demonstrated, with technical evidence, that there are no planning constraints on site that could not be addressed through development. Residential development in this location will offer appropriate and proportionate growth in a highly sustainable location.

On this basis, the site should be taken forward as an allocation for residential development in the emerging Local Plan.

I trust the above is of assistance in your consideration of selecting sites. Should you have any questions at this stage, please do not hesitate to contact me.

Yours faithfully



Jake Lambert  
**Planner, Planning**

**Enclosures**