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Dated: Friday 14th December 2018

Our Reference: A1401-03-01-01/1RA

Your Reference:

Greater Norwich Local Plan Team
Norfolk County Council
Martineau Lane
Norwich
NR1 2DH

Dear Sir/Madam,

**RE: REGULATION 18 CONSULTATION – NEW, REVISED AND SMALL SITES – SITE GNLP2155
(LAND WEST OF CARPENTER CLOSE)**

1.0 Introduction

- 1.1 We are writing on behalf of our client, Oxygen Real Estate Group, in response to the Stage B Regulation 18 Consultation (New, Revised and Small Sites) for the Greater Norwich Local Plan. The following comments comprise Oxygen Real Estate Group's submission to the consultation.
- 1.2 These comments focus on the proposed allocation of Site GNLP2155 (Land West of Carpenter Close) for up to 80 dwellings.
- 1.3 Site GNLP2155 was originally submitted for residential development as part of the Stage A Regulation 18 consultation that took place between January 2018 and March 2018.
- 1.4 It is understood that the current consultation is seeking views on the new sites that were put forward for allocation as part of the Stage A Regulation 18 consultation. Astill Planning Consultants therefore welcome the opportunity to submit further comments in support of the proposed allocation of Site GNLP2155 for residential development.

2.0 The Site

- 2.1 The site is located immediately adjacent to the existing built form and settlement boundary of Wymondham and measures circa 3.1 hectares in extent. It is bound by fields and woodland to the north, the new Becket's Grove residential development to the east, Downham Grove to the south and fields to the west. Drawing No.: A1401F001 (Site Location Plan) shows the locational context of the site.

- 2.2 The site is largely undeveloped, relatively flat and enclosed on all sides by trees and woodland.
- 2.3 Site GNLP2155 is located to the north of the B1172 (Norwich Road), which provides access to Attleborough, Norwich, Wymondham and the A11.
- 2.4 With respect to public transport, there are several bus stops located along Norwich Road, which are served by bus services running to/from Wymondham, Norwich City Centre, Dussindale, Blofield, Brundall, Lingwood and Acle.
- 2.5 The site also benefits from good access to the 'Blue Pedalway' cycle route which provides connections to Wymondham, Hethersett, Cringleford and Norwich.
- 2.6 The Housing and Economic Land Availability Assessment (HELAA) Addendum 2018 confirms that the

“site does not appear to be constrained regarding known ecological sites, the historic environment, or sensitive townscapes or landscapes”
- 2.7 The site also lies within Flood Zone 1 and thus has a low probability of fluvial or tidal flooding.

3.0 The Proposed Allocation

- 3.1 It is proposed that Site GNLP2155 is allocated in the Greater Norwich Local Plan for the development of up to 80 dwellings.
- 3.2 The site will be accessed from the Becket's Grove residential development to the east. The route of the access road has been agreed in principle with highways officers at Norfolk County Council.

4.0 Justification

Housing Needs

- 4.1 The HELAA 2017 states that

“Based on the Government’s consultation on calculating housing requirement, the objectively assessed need for the period 2017 to 2036 for the Greater Norwich authorities is 38,988 dwellings. As set out earlier in this document, regular monitoring of existing commitment sites (permissions and allocations), suggest that these will be delivered by 2036. These sites total 35,665 units.”
- 4.2 Paragraph 4.21 of the Regulation 18 Growth Options Document goes onto explain that

*“A 10% delivery buffer on the 38,988 OAN established using the Government’s methodology raises the plan provision to **42,887**. Taking account of existing commitment in April 2017 of 35,665 homes, this means that the GNLP has a **housing allocation requirement** to provide land for **7,222 homes, rounded to 7,200”***
- 4.3 This highlights a clear need to identify and allocate additional sites for residential development, which have a good prospect of coming forward over the plan period, to ensure that local housing needs are met. As set out below, Site GNLP2155 is considered to be a suitable and deliverable site for residential development and thus its proposed allocation in the Greater Norwich Local Plan would make a positive contribution towards meeting local housing needs.

4.4 Furthermore, Paragraph 4.65 of the Growth Options Document states that

“Economic, housing need and housing delivery evidence, plus the high level of existing commitment in Broadland, suggests overall levels of growth should be higher in South Norfolk than Broadland”

Given that Site GNLP2155 is located in South Norfolk, this further justifies its allocation for residential development.

The Growth Options for Greater Norwich

4.5 Wymondham is currently defined as a Main Town in the Joint Core Strategy because it offers a good range services, including 2 GP surgeries, several supermarkets, a wide range of shops, two high schools, employment opportunities and good access to the A11 and rail network. It therefore sits in the second tier of the settlement hierarchy below Norwich.

4.6 The Regulation 18 Growth Options Document sets out an ambition to retain a settlement hierarchy in Greater Norwich and keep Wymondham as a designated Main Town. In order to achieve the housing allocation requirement of 7,200 homes, the document proposes that the following approach is adopted:

1. Establish a *baseline of 3,900 homes*:

- a. 1,700 homes on previously developed land in Norwich and the built up areas of the fringe parishes; and
- b. 2,200 homes in the Main Towns and Key Service Centres (1,000 homes), Service Villages (1,000 homes) and Other Villages or Village Groups (200 homes), some of which may be on previously developed land.

2. Identify *alternative growth options for the remaining 3,300 homes* in fringe locations, Main Towns, Key Service Centres and Other Villages (or Village Groups).

4.7 Six alternative growth options are set out in the document

“to help to determine the most appropriate distribution of sites to be allocated for the additional 3,300 homes not in the baseline”.

4.8 Appendix 1 of the Regulation 18 Growth Options Document shows that five of the six alternative growth options will require the Main Towns to accommodate some of these 3,300 homes in addition to the 550 homes they will accommodate as part of the baseline growth.

4.9 In particular, Appendix 1 makes it clear that in each of these 5 alternative growth options, some of this growth will be distributed to Wymondham. Furthermore, it highlights that the majority of the additional housing growth that is proposed in the Main Towns for Option 2 (Transport Corridors) and Option 3 (Supporting the Cambridge Norwich Tech Corridor) will be allocated in Wymondham. It therefore seems highly likely that Wymondham will play an important role in accommodating the future housing growth that is required to meet housing needs in Greater Norwich over the plan period.

4.10 With respect to identifying new sites for residential development, paragraph 4.51 of the Growth Options Document states

“large numbers of brownfield sites are already committed through existing plans and the potential to identify additional sites is limited”.

Consequently, given the important role that Wymondham is likely to play in accommodating

housing development, it appears that the Greater Norwich Local Plan will need to allocate new greenfield sites for residential development around the Town.

- 4.11 As Site GNLP2155 is situated immediately adjacent to the existing built form and settlement boundary of Wymondham, it is considered to represent a suitably located site to accommodate a proportion of the 7,200 new homes that will need to be allocated in the Greater Norwich Local Plan.

Deliverability

- 4.12 Paragraph 2.42 of the Regulation 18 Growth Options Document highlights that, whilst completions have increased every year since 2010 in Greater Norwich, the *“Overall delivery of housing from 2008-14 was at approximately 70% of the target”*. As a result, the document states that *“There is a shortage of housing across all tenures in Greater Norwich”*. This demonstrates that there is a pressing need to increase housing delivery within Greater Norwich in order to address the past under delivery of housing and to meet current and future needs.

- 4.13 The introduction of the Housing Delivery Test in the revised NPPF 2018 has also increased the importance of local planning authorities ensuring that residential sites will be built out in a timely manner. This is because paragraph 215 of the NPPF 2018 establishes that from November 2020 the presumption in favour of sustainable development will apply in local planning authority areas where housing delivery is below 75% of its requirement over the previous three years.

- 4.14 It is therefore paramount that an adequate number of deliverable sites are allocated for housing in the new Local Plan. Annex 2 (Glossary) of the revised NPPF 2018 provides the following definition of deliverable:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. [...]. Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

- 4.15 Table 1 assesses the site against the tests of suitability, availability and achievability in accordance with the criteria set out in the National Planning Practice Guidance and the Norfolk Housing and Economic Land Availability Assessment Methodology (July 2016). In summary, Table 1 demonstrates that there is the potential for housing completions to begin on the site within five years, subject to its allocation in the new Local Plan.

- 4.16 It is therefore concluded that Site GNLP2155 is a deliverable site which has the potential to make a positive contribution towards delivering new housing in Greater Norwich at an early stage of the plan period. Given the growing housing needs in Greater Norwich and the implications of the Housing Delivery Test, the deliverability of the site should be given significant weight in the plan-making process.

Table 1: Assessment of the deliverability of Site GNLP2155 (suitability, availability and achievability)

| Deliverability Criteria | Assessment |
|-------------------------|--|
| Suitability | <p>The site is considered to be suitable for residential development because:</p> <ul style="list-style-type: none"> • It is located immediately adjacent to the existing built form and settlement boundary of Wymondham; • It is not subject to any known physical limitations in terms of access, infrastructure, ground conditions, hazardous risks, pollution or contamination; • The scheme could be sensitively designed to have a positive relationship with the surrounding landscape; • There are no designated heritage assets on the site or within its immediate vicinity; • It is located in an appropriate and attractive location for residential development; • It is not envisaged that the proposed residential development of the site would give rise to any adverse environmental or amenity impacts on future occupiers or neighbouring areas; • Wymondham has been identified as one of the most sustainable settlements in Greater Norwich by virtue of its proposed designation as a Main Town; and • Its suitability for residential development is confirmed in the HELAA Addendum 2018 which states <i>“For the purposes of the HELAA capacity assessment this site is considered to be: Suitable”</i>. |
| Availability | <p>The site is controlled by Oxygen Real Estate Group, who intend to see the site brought forward for residential development, and there are no legal constraints which would prevent this from taking place over the next 5 years. Therefore, the site is available for housing development.</p> |
| Achievability | <p>Given the location of Site GNLP2155 it is considered that delivering new housing on the site will be attractive to developers. Thus, the residential development of the site is deemed to be achievable.</p> |

Response to the Assessment of Site GNLP2155 in the HELAA Addendum 2018

4.17 Site GNLP2155 was assessed for its suitability as part of the HELAA Addendum 2018. In total, it received nine ‘Greens’ and five ‘Ambers’. The Amber ratings related to:

- Access
- Accessibility to Services
- Utilities Capacity
- Flood Risk
- Biodiversity and Geodiversity

4.18 Paragraph 2.22 of the Norfolk Housing and Economic Land Availability Assessment Methodology (July 2016) explains that

“Amber’ impacts and constraints will not immediately rule out the suitability of development of a site. However, some mitigation will be required in order for the site to be suitable and the

feasibility and extent of that mitigation will need to be identified through further research. [...] Therefore, sites assessed as 'amber' against any type of constraint or impact will be considered potentially suitable providing that constraints could be overcome, (based on officers' judgement), but would almost inevitably require a more detailed assessment before they could be confirmed as suitable for Local Plan allocation."

- 4.19 The purpose of this section is to respond to the comments raised by planning officers in relation to the Amber ratings given to Site GNLP2155 and thus demonstrate that it would be possible to address these during the development of more detailed proposals for the site.

Access

- 4.20 It is proposed that access to the site will be provided through the Becket's Grove residential development to the east.
- 4.21 Several options for the route of the access road have been discussed with Norfolk County Council's Highways Department. Following a constructive dialogue with highways officers at Norfolk County Council, the route of the access road has been agreed in principle. This will be subject to further technical assessments prior to the submission of the planning application for the residential development of the site.
- 4.22 Additionally, the Initial Highways Appraisal for the proposed development, which was submitted to the Greater Norwich Growth Board as part of the original representations for the site in early 2018, found that the construction of 80 dwellings on the site

"...will be likely to generate circa 65 and 55 two-way vehicle movements in the morning and evening peak travel periods respectively. Daily activity is anticipated to equate to circa 490 movements."

"Vehicular activity of this magnitude equates to approximately one additional movement every minute in the peak travel periods, which is not considered to constitute a material increase in traffic and is thus unlikely to result in the severe impact that is referred to by the NPPF as being the only legitimate reason to a potential development from a highways and transportation perspective."

- 4.23 In light of the above, it is considered that a safe and suitable access for all can be provided to the site and thus the comments made in the HELAA in respect of access have been adequately addressed.

Accessibility to Services

- 4.24 Site GNLP2155 benefits from good access to the 'Blue Pedalway' cycle route that runs along Norwich Road and provides connections to several bus stops, a range of local services and facilities and the main commercial centre of Wymondham. It also provides a direct link between Wymondham, Hethersett, Cringleford and Norwich.
- 4.25 Additionally, safe pedestrian access to Wymondham Town Centre is provided by the existing local footpath network. There are also a number of bus stops located along the B1172 which are served by bus services running to/from Wymondham, Norwich City Centre, Dussindale, Blofield, Brundall, Lingwood and Acle. These routes also connect to several local rail stations, including Norwich Rail Station.
- 4.26 It is therefore considered that future residents would be able to access local services and facilities via a variety of sustainable transport modes.

Utilities Capacity

4.27 It appears that the site received an Amber rating for this criterion because planning officers considered it to be *“likely that the sewerage infrastructure would need to be upgraded”* to accommodate the proposed development. There will be an opportunity to work with the relevant utilities providers during the planning process and pre-development phase to discuss any improvements that need to be delivered as part of the development in respect of the utilities capacity, which will enable any issues to be resolved.

Flood Risk

4.28 The Norfolk Housing and Economic Land Availability Assessment Methodology (July 2016) states that

“flooding may not provide an absolute constraint to development” because there is sometimes the potential for mitigation.

4.29 As a result, the findings and recommendations of the technical studies and reports that are produced to accompany a future planning application for the site would be used to inform a suitable design solution to mitigate against surface water flooding on the site. Additionally, our client is willing to discuss the potential options available for the site in respect of flood risk mitigation with planning officers during the plan-making process should this be deemed to be necessary.

4.30 It is also worth noting that approximately 2.3 hectares of the site is not at risk of surface water flooding and thus would be suitable for residential development without the need for mitigation.

Biodiversity and Geodiversity

4.31 An ecological assessment of the site would be carried out prior to the submission of a planning application and would be used to inform the layout and design of the scheme. There is also scope to explore the opportunities available for delivering ecological enhancements on the site.

4.32 Additionally, it is intended that the proposed development would be designed to have a positive relationship with the wooded areas adjacent to the site as they will help to create a soft transition between the edge of the built development and the neighbouring fields. Furthermore, additional tree planting could take place along the boundaries of the site to help screen views of the development from the surrounding fields. These design features should facilitate the successful integration of the proposed development into the natural environment by enabling the new properties to sit comfortably within their landscape setting.

The performance of Site GNLP2155 in the HELAA compared to the other sites in and around Wymondham that have been put forward for allocation in the Greater Norwich Local Plan

4.33 As discussed above, the options for housing growth that are presented in the Regulation 18 Growth Options Document suggest that new housing sites will need to be allocated in Wymondham. 14 potential housing sites in and around Wymondham were consulted on as part of the Stage A Regulation 18 consultation in early 2018. 8 new sites¹ and a revised site (GNLP0525R) are being consulted on as part of the current Stage B Regulation 18 consultation. One of these sites is Site GNLP2155 (Land West of Carpenter Close), which these written

¹ These are shown in *italics* in Table 2.

representations are focused on promoting.

4.34 Table 2 provides a summary of the site suitability assessment for each of the Wymondham sites in the HELAA 2017 and the HELAA Addendum 2018. This reveals that only 3 sites score more Greens than Site GNLP2155.

4.35 However, it is worth noting that Site GNLP0006 is 53.68 hectares and the Regulation 18 Growth Options Document states that

“Whilst larger sites can provide new services and facilities, recent experience has shown that they are more difficult to get off the ground. Smaller sites are often more likely to deliver and can support the vitality of existing settlements.”

It is therefore considered likely that should Site GNLP0006 be allocated for residential development, a significant proportion of the housing delivered on the site would be delayed until later in the plan period.

4.36 Additionally, Site GNLP2125 only has an estimated capacity of 8 dwellings. Therefore, in the event that it is allocated for residential development, it is unlikely that it would be able to accommodate the level of housing growth that is required in Wymondham and therefore there would be a need to allocate a number of other sites for housing as well.

4.37 Furthermore, Site GNLP2169 has an expected capacity of 32 dwellings and is subject to an existing allocation for housing. Consequently, it would not contribute to any additional residential development capacity.

4.38 This means that Site GNLP2155 represents the next best performing site in and around Wymondham in respect of Green ratings. Given the need to deliver more housing in Wymondham and the fact that the Amber ratings awarded to Site GNLP2155 could be addressed, it is concluded that the findings of the HELAA 2017 and the HELAA Addendum 2018 provide strong support for allocating Site GNLP2155 for residential development.

Table 2: Summary of the HELAA suitability assessment that has been carried for all the sites put forward for residential development in Wymondham up to 17th August 2018

| Site Reference | Site Name | Greens | Ambers | Reds |
|----------------|---|--------|--------|------|
| GNLP0006 | Land to the North of Tuttlles Lane East | 10 | 4 | |
| GNLP2125 | South of Norwich Common | 10 | 4 | |
| GNLP2169 | Within WYM3 & WYM13 allocation | 10 | 4 | |
| GNLP2155 | West of Carpenter Close | 9 | 5 | |
| GNLP0092 | Land on road frontage off B1172, Norwich Common | 8 | 6 | |
| GNLP0320 | Land south of Gunvil Hall Farm bordering Sutton Lane and Sawyers Lane | 8 | 6 | |
| GNLP2150 | North east of Carpenters Barn | 8 | 6 | |
| GNLP0227 | Land at Eleven Mile Lane | 7 | 7 | |
| GNLP0355 | Land at Rightup Lane | 7 | 7 | |
| GNLP0402 | Land to the north-east of Silfield Road | 7 | 7 | |
| GNLP0403 | Land to the south-west of Silfield Road | 7 | 7 | |
| GNLP2073 | Burnthouse Lane | 7 | 6 | 1 |
| GNLP2090 | East of Field House | 7 | 7 | |
| GNLP2157 | Great Expectations | 7 | 7 | |
| GNLP0032 | Land off Silfield Road | 6 | 8 | |
| GNLP0200 | Silfield Pitch and Putt, The Street | 6 | 8 | |

| | | | | |
|------------------|---|---|----|---|
| <i>GNLP2168</i> | <i>Park Farm</i> | 6 | 7 | 1 |
| GNLP0525 | North East Wymondham | 5 | 9 | |
| <i>GNLP0525R</i> | <i>North East Wymondham</i> | 5 | 9 | |
| GNLP0354 | Land at Johnson's Farm | 5 | 7 | 2 |
| GNLP0507 | Land at Browick Road | 4 | 10 | |
| GNLP1055 | West of Hethel, Stanfield Hall Estate, Stanfield Road | 4 | 10 | |
| GNLP0515 | Land at south Wymondham - north and south of the A11 and west of Park Lane | 3 | 11 | |

5.0 Summary & Conclusion

5.1 This written submission has been prepared in support of allocating Site GNLP2155 (Land West of Carpenter Close) for residential development in the Greater Norwich Local Plan.

5.2 In summary, the following salient points have been raised in relation to the proposed allocation:

- The Greater Norwich Local Plan has a housing allocation requirement of around 7,200 homes. There is therefore a need to identify and allocate additional sites for residential development, which have a good prospect of coming forward over the plan period, such as Site GNLP2155, to ensure that local housing needs can be met.
- The Regulation 18 Growth Options Document shows that five of the six alternative growth options for Greater Norwich will distribute some of these 7,200 homes to sites in and around Wymondham in addition to any sites allocated as part of the baseline growth. Consequently, sites in Wymondham, such as Site GNLP2155, are likely to play an important role in delivering the residential development that is required to meet housing needs in Greater Norwich over the plan period.
- The Regulation 18 Growth Options Document explains that the potential to identify additional brownfield sites to accommodate the required levels of housing growth is "limited". As a result, there is likely to be a need to allocate suitable greenfield sites, such as Site GNLP2155, for residential development in the Greater Norwich Local Plan.
- Site GNLP2155 has the potential to deliver new housing in Greater Norwich at an early stage of the plan period. Given the growing housing needs in Greater Norwich and the implications of the Housing Delivery Test, the deliverability of the site should be given significant weight in the plan-making process.
- It would be possible to address the Amber ratings awarded to Site GNLP2155 in the HELAA Addendum 2018 during the detailed design stage. Additionally, Site GNLP2155 performs well against the suitability criteria set out in the HELAA when compared to the other sites put forward for development in and around Wymondham. Therefore, given the ambition to deliver more housing in Wymondham, the findings of the HELAA are considered to provide strong support for allocating Site GNLP2155 for residential development.
- The site is situated immediately adjacent to the existing built form and settlement boundary of Wymondham and therefore represents a logical location for the expansion of the Town.
- The residential development of the site would make a positive contribution towards delivering sustainable development.

- A safe and suitable access to the site could be provided from the Becket's Grove residential development. The route of this access has been agreed in principle with highways officers at Norfolk County Council.

5.3 *In light of the above factors, it is concluded that Site GNLP2155 (Land West of Carpenter Close) should be allocated for residential development in the new Greater Norwich Local Plan.*

Yours faithfully,

Ryan Astill MRTPI
Managing Director
For and on behalf of
Astill Planning Consultants Ltd