

Your ref: GNLP0337
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 Date: 13/12/18

Greater Norwich Projects Team
 c/o Norfolk County Council
 County Hall
 Martineau Lane
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Dear Sir/Madam

**GREATER NORWICH LOCAL PLAN REGULATION 18 CONSULTATION
 GNLP0337 – LAND BETWEEN FIR COVERT ROAD AND REEPHAM ROAD, TAVERHAM**

I write on behalf of M Scott Properties Ltd ('Scott Properties'), in relation to site GNLP0337 ('the site'), which was submitted to the Greater Norwich Development Partnership (GNDP) as a potential development site through the Call for Sites process in January 2017.

The site is formed of Land between Fir Covert Road and Reepham Road, Taverham and extends to 78.36 Ha. The site is bound by the Broadland Northway, which alongside Fir Covert Road and Reepham Road, gives a strong defensible boundary to the proposed site and represents a logical rounding off of the settlement - this is successfully shown within the accompanying drawings.

The site was subject to an initial assessment in the Housing and Economic Land Availability Assessment (HELAA) published in December 2017, with further commentary provided in the Site Proposals Document published for Regulation 18 (Stage A) Consultation in January 2018. The site was assessed as being 'suitable' in relation to delivery of 1,400 dwellings with associated public open spaces, a new primary school and local centre.

The HELAA assessment (as shown below) concluded that the site is suitable for residential development, but 3 constraints/impacts were given an amber rating in relation to the assessment of the site's suitability.

Constraints Analysis

Access	Green
Accessibility to Services	Green
Utilities Capacity	Amber
Utilities Infrastructure	Green
Contamination and Ground Stability	Green

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Flood Risk	Green
Market Attractiveness	Green

Impacts Analysis

Significant Landscapes	Green
Townscapes	Amber
Biodiversity and Geodiversity	Amber
Historic Environment	Green
Open Space and GI	Green
Transport and Roads	Green
Compatibility with Neighbouring Uses	Green

The HELAA methodology, published in July 2016, advises that amber impacts and constraints will not immediately rule out the suitability of development, but some mitigation will be required. The methodology further states that sites with some amber ratings will almost inevitably require a more detailed assessment before they could be confirmed as suitable for Local Plan allocation.

We therefore write to provide further detail on the three constraints/impacts which received an amber rating and also an update as to site progress, to provide the GNPD with confidence that the potential constraints/impacts can be overcome, that the site is suitable, achievable and deliverable as a Local Plan allocation, and that the site can make a meaningful contribution towards housing and infrastructure. This information supplements that already provided by M Scott Properties Ltd in their Vision Document (January 2017) and Delivery Statement (March 2018).

As previously stated, three constraints/impacts have been given an amber rating in the HELAA assessment for site GNLP 0337. The information provided to date and below, supports the quantum of development assessed within the HELAA, but also seeks to provide sufficient flexibility, so that the site is capable of responding to additional/alternative requirements as emerging Local Plan progresses. These are addressed in turn below:

Utilities Capacity

The HELAA methodology advises that an amber rating indicates that there is no available utilities capacity at present, but there is potential for improvements to facilitate capacity. The site-specific suitability conclusions expand on this, identifying that sewerage infrastructure and water supply upgrades may be required.

A Utilities and Wastewater Assessment has been prepared by Cannon Consulting Engineers, and is enclosed with this letter.

The Assessment confirms that an outline connection strategy has been discussed with UKPN for the provision of electricity to the site. This entails laying two high voltage cables from Horsford Primary

Substation to the site, and establishing 4 on-site substations. In relation to gas, there is sufficient capacity in the existing supply locally and no off-site reinforcement works are likely to be required.

Correspondence with Anglian Water in 2017 confirmed that there was sufficient capacity within the existing network to supply potable water to the scale of development envisaged, with a point of connection identified on Fir Covert Road. New charging rules introduced in April 2018 mean that the proposed development will pay a charge per dwelling regardless of the fact that there is existing capacity, and the funds raised are used to carry out improvements to the network as required. It can therefore be confidently concluded that there will be no issues with potable water supply, and that additional development of the scale proposed has the ability to contribute significantly to the existing network.

There are BT services in the area with both overhead and underground cables in the surrounding road network, and BT has a statutory obligation to provide telecommunication services.

In relation to sewerage infrastructure, the new charging regime introduced in April 2018 means that the improvements required to accept wastewater from the development into the Anglian Water network will be funded and provided by Anglian Water. This will ensure that the site would not be subject to any significant abnormal costs for sewerage infrastructure. The site is within the catchment of Whitlingham Trowse Water Recycling Centre, which has capacity to treat the flows arising from the proposed quantum of development.

It is clear that electricity and wastewater infrastructure can be mitigated through measures that are readily available, and that through additional development, significant funding could be put into the local infrastructure network. Therefore, utilities capacity should not be amber, when in fact additional development could improve the current status of local infrastructure.

Townscapes

An amber rating for Townscapes indicates that development of the site would have a detrimental impact on townscapes which could be mitigated.

Sensitive townscapes are identified as those areas within and adjacent to National Parks, the Broads and Areas of Outstanding Natural Beauty and include Conservation Areas where up to date appraisals have indicated a high level of townscape significance, where development may affect particular concentrations of listed or locally listed buildings with collective townscape value and any other areas identified as particularly sensitive in Local Plans, local townscape appraisals or historic character studies. Other considerations include the potential loss of protected trees on the amenity of the area.

It is not clear from the site-specific comments the reason for the amber rating for this potential impact. The site is not within or adjacent to a National Park, the Broads or an AONB. There are no Listed Buildings within the site, or in close proximity; the closest Listed Buildings are over 1km from the site, and separated via intervening development and landscape features. There is no Conservation Area within Taverham or Drayton, and we are not aware of any local townscape appraisals or historic character studies that have been undertaken and identify the area as particularly sensitive in townscape terms.

The visual impact of development on the site would be limited, as demonstrated on the enclosed drawings prepared by Brown & Co and the limited landscape receptors that would be impacted by development. The existing bunding along the Broadland Northway which delineates the northern boundary of the site restricts views across the site from the north. Existing housing along Fir Covert Road limits views from the west, and existing tree belts along the eastern and southern boundaries limit views from these directions.

As described earlier in the document, the presence of the recently built Broadland Northway has presented an opportunity to create a highly sustainable extension to Taverham with very limited landscape impact. We therefore consider that the rating for townscapes should be revised to green, to reflect the fact that, as

per the HELAA methodology, development of the site would have either a neutral or positive impact, but not a detrimental impact, on townscapes.

Biodiversity and Geodiversity

The HELAA methodology advises that an amber rating for Biodiversity and Geodiversity indicates that development of the site may have a detrimental impact on a designated site, protected species or ecological network, but the impact could be reasonably mitigated or compensated.

The River Wensum is designated as both a SSSI and a Special Area of Conservation (SAC), and is approximately 1.2km west of the site. Marriott's Way, which bisects the site, is a County Wildlife Site (CWS). Further afield are a number of other International Protected Sites including Broadland (RAMSAR, SPA), the Norfolk Valley Fens (SAC) and the Norfolk Broads (SAC).

A Preliminary Ecological Appraisal (PEA) has been prepared by Geosphere Environmental Ltd and is enclosed with this letter, which concludes that significant impacts to statutory designated nature conservation sites are not anticipated, due to the distance of the development from such sites. Recreational pressure can be avoided through the provision of Suitable Alternative Natural Greenspace (SANG) and the site offers significant opportunities for such provision. A network of linked high-quality semi-natural areas is integral to the masterplan for the site, including links with the existing network of Public Rights of Way. Circular walking routes of varying lengths will be included, for dog-walking and general recreation.

The Marriott's Way CWS can be protected during development; the PEA advises that protection measures for the trees should provide a suitable buffer from impacts of development, and Marriott's Way will remain unlit.

The PEA identifies potential for a number of Protected Species to be found within the site, and further survey work will be required to establish presence/absence. The PEA's findings are as expected for a greenfield site in the area, and do not raise any issues that are considered to be unusual. No habitats that occur within the site have high ecological importance on an international, national, regional or county scale, but are of local significance only. Mitigation measures to ensure that there is no adverse impact on Protected Species will be identified following further survey work.

In addition, the site offers ample opportunity for biodiversity enhancements, which will increase the biodiversity value of the site.

In light of the above, it is clear that development of the site will not have a detrimental impact on any designated site, protected species or ecological network. There would be clear opportunities to increase the biodiversity value of the site, whilst also providing greater access so that existing and new residents would be able to enjoy the green infrastructure and improved accessibility to Marriott's Way.

Conclusion

The site offers an excellent opportunity to maximise the opportunity that has been presented through the delivery of the Broadland Northway; a highly accessible site that represents a logical extension to the settlement of Taverham at a size and scale that can provide a significant quantum of the infrastructure and housing required in the Greater Norwich Area over the next two decades.

The supplementary technical information provided with this letter demonstrates that there are no issues in relation to utilities capacity, townscapes of biodiversity and geodiversity, and the site is entirely suitable for Local Plan allocation.

Both Scott Properties and Bidwells are keen to continue engaging with the Greater Norwich Local Plan team to meet the challenges of the necessary growth, and look forward to discussing matters further in due course.

I would be grateful if you would acknowledge receipt of these representations.

Should you have any questions at this stage then please do not hesitate to contact me.

Kind regards

Sarah Hornbrook
Associate, Planning

Enclosures