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Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX

Jonathan Dixon BA (Hons) MA MRTPI FRSA
E: jonathandixon@savills.com
DL: +44 (0) 1223 347069
F: +44 (0) 1223 347111

By email to: gntp@norfolk.gov.uk

Unex House
132-134 Hills Road
Cambridge CB2 8PA
T: +44 (0) 1223 347 000
F: +44 (0) 1223 347 111
savills.com

Dear Sirs,

**GREATER NORWICH LOCAL PLAN
REGULATION 18 CONSULTATION – NEW, REVISED AND SMALL SITES
29 OCTOBER – 14 DECEMBER 2018**

Savills (UK) Ltd are instructed on behalf of Barratt David Wilson (BDW) Homes (Eastern Counties) to submit representations on the site known as Horsford Phase 3 (land south of Green Lane) (Site Ref. GNLP2160). This covering letter, along with the enclosed Vision Document comprises our representations to the current consultation.

Once you have had time to discuss the site to consider these representations, we would welcome the opportunity to meet with you to discuss the site further, especially the contribution that it can make to the early and continued delivery of much-needed housing (including affordable housing) on a site that has no over-riding constraints.

Context

As confirmed by the representations submitted during the previous Call For Sites Consultation which ran between January and March 2018, the land adjacent to this site has full planning permission for residential development.

The approved scheme also under the ownership of BDW Homes (Eastern Counties), known as Horsford Phase 2 (Kingfisher Meadows – Land east of Holt Road) was approved on the 6th October 2017. This is currently under construction.

The adopted Joint Core Strategy (2014) identifies Horsford as a 'Service Village', where allocations for small scale residential development. However, it is also noted that Horsford is identified as a settlement, due to being located within the Norwich Policy Area, which may be considered for additional development if necessary, as per Policy 9.

The site identified and promoted through this Call For Sites Consultation provides a logical extension for housing development in the village. The site is consistent with the policies and objectives contained within the adopted Horsford Neighbourhood Plan.

Site Proposals and HELAA Constraints / Impacts Analysis

As discussed further in the **Vision Document** enclosed herewith, the site is capable of delivering 500 new homes with an approximate density of 32-35 dwellings per hectare.

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Access

The access to Phase 3 would be from Phase 2, with the access to Phase 2 having capacity to serve an additional 500 homes within Phase 3 (see **Highway Capacity Assessment** enclosed herewith).

All of the access infrastructure required to serve Phase 3 is thus already approved / in place or controlled by BDW Homes (Eastern Counties). Additional pedestrian, cycle and emergency accesses would also be provided as indicated in the Vision Document enclosed herewith.

On this basis, we thus suggest that the constraints analysis for 'Access' is re-categorised to 'green' in the suitability assessment of the site.

Access to Services

Although the constraints analysis already categorises the site as 'green' in this regard, further work (see **Education Report** enclosed herewith) has been undertaken by BDW Homes (Eastern Counties) to confirm that there is capacity on the site of the existing primary for the school to be expanded to accommodate another form of entry, which is approximately what would be generated by a further 500 new homes.

That there is sufficient capacity to expand the school and that that the school is adjacent to the site, serves to further reinforce the 'green' categorisation already assigned, and reinforce the site's sustainability credentials.

Drainage

With regard to flood risk, the site is wholly located within Flood Zone 1 according to the Environment Agency Flood Mapping. The maps also show that the site is not at risk from surface water flooding. Infiltration testing has taken place on both Phase 1 and 2, by BDW Homes (Eastern Counties) and it all studies to date indicate that the same approach could be taken to draining Phase 3 (see **Utilities and Drainage Review** enclosed herewith).

On this basis, we thus suggest that the constraints analysis for 'Flood Risk' is re-categorised to 'green' in the suitability assessment of the site.

Utilities

(See **Utilities and Drainage Review** enclosed herewith.)

With regards to utilities (capacity and infrastructure), foul water drainage has been accommodated for as part of the Phase 2 development with an adoptable pumping station, with the ability to receive pumped flows from a Phase 3 of 500 homes.

With regard to electricity supply, the High Voltage Network was extended as part of Phase 2 to serve the new substation. This has again been designed to accommodate a Phase 3 of 500 homes.

There is also sufficient gas supply with offsite works completed for Phase 2 which can accommodate the supply for a further 500 homes.

On this basis, we thus suggest that both the constraints analysis for 'Utilities Capacity' and 'Utilities Infrastructure' are both re-categorised to 'green' in the suitability assessment of the site.

Biodiversity and Geodiversity

The Vision Document shows how the development of the site could deliver a new Nature Park to the north of Green Lane to enhance the existing natural environment, whilst also creating new community public open space. There would be further opportunities to create a net gain in biodiversity through the creation of new habitats within and around the site.

With the knowledge of the site and surrounding area gleaned from the development of Phases 1 and 2, and the Ecological Study undertaken by TMA in relation to Phase 3 (see enclosed 'Ecological Report' dated December 2018) there are no likely significant adverse impacts that would arise off-site, especially given the proposed creation of the new Nature Park.

On this basis, we thus suggest that the impact analysis for 'Biodiversity and Geodiversity' is re-categorised to 'green' in the suitability assessment of the site.

Historic Environment

Development on the site would have a negligible effect on the setting of the Scheduled Monument known as 'Two round barrows on Horsford Heath' (reference: 1003164), to the north, this effect being predominantly due to there being no intervisibility (see **Archaeological Statement** enclosed herewith). With mitigation measures in place, development would result in less than substantial harm to the significance of the Scheduled Monument. Therefore it can be considered that this harm would lie at the lower end of the scale of less than substantial harm. A review of relevant available data indicates that any surviving archaeological remains on the site are likely to be of local significance.

On this basis, we thus suggest that the impact analysis for 'Historic Environment' is re-categorised to 'green' in the suitability assessment of the site.

Summary

The re-categorisation of the site's constraints / impacts analysis as discussed above **would result in all of the constraints analysis criteria being 'green'**, with more of the impacts analysis criteria also now being 'green'. The lack of any 'red' and a low number of 'amber' scores on the assessment, shows that the site is suitable for residential development.

Delivery

BDW Homes (Eastern Counties) have a very good record of delivery within Horsford. Phase 1 (125 dwellings) was completed June 2017 and Phase 2 (259 dwellings) is currently under construction with 34 units complete at the time of writing (see further details in the table below).

It is anticipated that Phase 2 will be completed in 2023. A CIL payment of £391,528.10 has already been paid with a second instalment due to be paid on the 11th February 2019. BDW Homes (Eastern Counties) can also demonstrate successful delivery of other residential sites across the NPA, including sites in Aylsham and Poringland.

Horsford Phase 3 provides a logical and suitable opportunity for residential development in an established location with Horsford benefiting from both existing and planned infrastructure. Given the presence of BDW Homes (Eastern Counties) in Horsford, there is certainty that the site can be delivered within the early years of the plan, and moreover delivered in a quick and timely fashion without the usual delays associated with starting on site. Delivery of Phase 3 could commence as early as 2024 (i.e. within the first 5-year period of the plan period, extending into the second 5-year period), and would deliver c. 100 new homes a year.

Track Record

Location	Number of homes approved	Number of homes completed	Complete date (anticipated or actual)	CIL payments made (Yes, No, N/A)
Sir Williams Lane, Aylsham	300	239	300 to be completed by Sep 2019	N/A
Caistor Lane, Poringland Phase 1	150	150	Completed Oct 2018	N/A
Stoke Road, Poringland Phase 2	120	25	120 to be completed by mid-2020	Yes, two payments totalling £658,587.40
Horsford Phase 1	125	125	Completed June 2017	N/A
Horsford Phase 2	259	34 homes (2019)	To be completed by end of 2023	1 st instalment paid £391,528.10 2 nd instalment due Feb 2019

We trust that this additional information in addition to the accompanying **Vision Document** will assist you in your consideration of the site.

Please do not hesitate to contact us if we can be of any further assistance.

Yours sincerely

Jonathan Dixon BA (Hons) MA MRTPI FRSA
Associate Director

- Encs:
- Vision Document (Savills), December 2018
 - Highway Capacity Assessment and Public Transport Provision Review for Phase 3 Development (Richard Jackson), 6 December 2018
 - Education Report: Land at North Horsford (Phase 3) (EFM), December 2018
 - Utilities and Drainage Review (BDW), 29 November 2018
 - Ecological Report (TMA), December 2018
 - Archaeological Statement (CGMS), December 2018