

Greater Norwich Local Plan – Draft Strategy: Response on behalf of Hopkins Homes (March 2020)

1. Introduction

Wood is retained by Hopkins Homes to respond to the Greater Norwich Local Plan (GNLP) Draft Strategy consultation on its behalf, particularly with regard to its land interest at south Wroxham. Hopkins Homes **objects to the Draft GNLP** because it does not allocate any new homes at Wroxham. It is considered that land at south Wroxham has potential to deliver new homes in a highly sustainable manner. There is no technical justification for the omission of new allocations at Wroxham. The current approach will not meet the identified needs in the recently adopted Wroxham Neighbourhood Plan, including needs for older people. Hopkins Homes' land at south Wroxham presents a logical and sustainable location for new housing provision and meets the tests of soundness set out in the NPPF. The remainder of this response addresses the following questions:

- **Question 13 - Spatial Strategy:** we object to the spatial distribution as it does not make provision for new homes at Wroxham. Development is needed here to meet identified needs. This is a highly sustainable location for development and can assist in boosting housing supply.
- **Question 16 – Five year land supply:** we object to the five-year supply calculation which has not applied the Planning Practice Guidance correctly. The five-year supply position is less favourable than the GNLP suggests meaning that additional allocations are required to boost supply and give flexibility.
- **Question 44: Site Options at Wroxham:** addresses technical points in the Council's evidence base on landscape and traffic and sets out why land submitted by Hopkins Homes at South Wroxham is deliverable and should be allocated.

2. Question 13: do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?

Summary: Hopkins Homes supports the settlement hierarchy including the identification of Wroxham as a key service centre. This is in recognition of the good level of services and its sustainable location. However, Hopkins Homes objects to the spatial distribution of new homes contained in Policy 1 and specifically, the lack of allocations in Wroxham. This will not provide a positively prepared or justified plan for the following reasons:

1. The spatial strategy perpetuates the development strategy in the current Joint Core Strategy and will not address the persistent patterns of under delivery which have been recorded over a long period.
2. The spatial strategy will not address development needs in sustainable rural locations such as Wroxham.

3. The proposed spatial strategy will not address identified needs in the Wroxham Neighbourhood Plan, including housing for older people.
4. The distribution of growth is not justified. There is no technical case to preclude development at Wroxham.

1. The proposed Spatial Strategy and distribution of growth will not address persistent patterns of under delivery

Policy 1 outlines that utilising the standard methodology for calculating housing need, a total of 40,541 dwellings are required between 2018 to 2038 (2,027 per annum). The GNLP is planning for 44,343 dwellings. Taking into account existing commitments (33,565) and homes delivered in 2018/19 (2,938 dwellings), the GNLP is proposing 7,840 new allocations.

Although on face value it would appear from the figures that there is sufficient supply to meet the GNLP target over the Plan Period, the current Development Plan has not been successful in delivering new homes to meet the significant needs in GNLP area. The GNLP councils have failed to deliver against the current Local Plan targets over the current plan period, with annual targets of a similar level to the Local Housing Need requirement. The GNLP acknowledges that in the period 2011-2019 only 87% of the housing requirement has been delivered (paragraph 43). More worryingly the patterns of under delivery stretch back much further and from 2008-2014 only 70% of the area's housing requirement was delivered. The level of delivery of new homes in recent years remains considerably below target with the Council missing delivery targets in 5 of the last 8 years in the current Plan Period.

Although in the last three monitoring years housing completions across the GNLP area have improved, it remains a long way below the annual target since the date of the adoption of the current Development Plan. The GNLP acknowledges that the uplift in recent years can partly be attributed to student housing which can now be included in the monitoring figures, but this is not addressing wider housing needs. Against a target of 16,346 since the date of the JCS adoption (2011/12) only 14,655 dwellings were delivered. This is a shortfall of 1,691 dwellings which needs to be considered as part of the 5-year supply calculation (see response to Q16 below).

In line with the NPPF local authorities will be expected to identify and manage the release of land to maintain the momentum of housing delivery. To boost housing delivery, the GNLP should allocate a mix of sites, including alternative smaller deliverable options in settlements such as Wroxham. This will provide flexibility in supply and thereby allow the Council to quickly respond to fluctuations in delivery. This approach would be consistent with the NPPF. The presumption in favour of sustainable development is a key material consideration for both plan-making and decision-taking. Specifically, in relation to plan-making, paragraph 11 of the NPPF states that this means that: "*plans should positively seek opportunities to meet the development needs of their area.*"

2. The proposed Spatial Distribution will not address rural housing needs

Whilst provision is made for 3,417 dwellings in key service centres this includes 2,902 existing commitments and only 515 new allocations. However, further development in rural areas, including at Wroxham is needed to more effectively address rural needs. The NPPF and the Planning Practice Guidance state the importance of addressing issues facing rural areas in terms of housing supply and affordability and recognise the role that housing can play in supporting the sustainability of villages and smaller settlements.

The GNLP should provide a spatial option(s) which balances the need to locate new development in larger settlements with the development needs of other sustainable locations, such as Wroxham.

Wroxham performs well in sustainability terms and has a good level of services including access to education, health and shops for example as well as public transport links to higher order settlements (see response to question 44). As a highly sustainable location with a good amount of facilities to meet day to day needs, Wroxham has the significant potential to meet development needs in a highly sustainable manner.

A spatial strategy which includes growth at Wroxham would be consistent with the NPPF (paragraph 78) which states that *"to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive (emphasis added)."*

3. The proposed Spatial Strategy will not address local needs including needs of older people

The NPPF (paragraph 77) states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. There is an identified local need for accommodation for older people at Wroxham for which the draft GNLP does not make provision for. Without allocating any new development at Wroxham, the needs for different types of housing cannot be addressed, including housing for older people in addition to affordable needs.

The Wroxham Neighbourhood Plan was adopted in March 2019 and forms part of the Development Plan. The Neighbourhood Plan notes that whilst there are a considerable number of family homes in Wroxham, there is latent demand for housing for older people. This includes smaller houses to enable local residents to downsize and free up larger family homes. To this end, Policy HBE2 of the Wroxham Neighbourhood Plan identifies that housing developments are required to help address the needs for older people. It states that developments of 5 or more units will be expected to include housing to meet the needs of the elderly which could include the provision of a mix of dwellings including a proportion of bungalows and smaller retirement properties for downsizing.

Whilst the standard method for assessing local housing need identifies an overall minimum average annual housing need figure, the Planning Practice Guidance (Paragraph: 001 Reference ID: 67-001-20190722) notes that this does not break this down into the housing needs of individual groups. It continues by stating that Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area. It also notes the importance of planning for the needs of older people (Paragraph: 001 Reference ID: 63-001-20190626).

Paragraph 60 of the NPPF requires local planning authorities to prepare a local housing need assessment which takes into account current and future demographic needs. Paragraph 61 states that, amongst other things, the amount and tenure of housing needed for different groups should be assessed and reflected in planning policies including housing for older people and people with disabilities, something we consider the draft GNLP fails to do at Wroxham.

The Strategic Housing Market Assessment (SHMA) was produced in 2017 as part of the evidence base for the emerging GNLP. The 2014-SNPP projections suggest that the population in Broadland will increase to around 140,100 by 2036 with the age profile showing a greater weighting towards the age groups of 60+. The Broadland population in the 60+ age groups is projected to significantly increase by around 14,000 in the period 2015-2036 from 31.4% in 2015 (39,772 people in total) to 38.6% in 2036 (53,446 people in total).

This evidence supports the aims of the Wroxham Neighbourhood Plan in demonstrating a clear need for accommodation which will meet the evolving needs of older people. This can in part be met by providing further market housing at Wroxham which provides a mix of dwellings, including an element of smaller properties and bungalows (including a proportion of homes built to the Building Regulation M4(2)[1] accessible and adaptable home standards) to widen housing choice in Wroxham and align the housing stock to the evolving demographic needs of the local population. This will assist in enabling local residents to stay in the community in which they currently live.

4. The Spatial Strategy is not justified: there is no technical case to preclude development at Wroxham

The GNLP states traffic concerns and proximity to the Broads as being factors in limiting growth at Wroxham. However, the evidence does not support the case that there should be no further growth at Wroxham in both respects. These considerations also need to be balanced against the assessment of each of the alternative options in terms of their social, environmental and economic performance to meet the requirements for a holistic approach set out in NPPF. These issues have been previously considered in the preparation of the Joint Cores Strategy. The JCS supports and encourages development in Key Service Centres, including Wroxham. The Spatial Vision chapter of the document states that Wroxham can comfortably accommodate between 100-200 new dwellings over the Plan Period to 2026. Only around 100 homes have been delivered to date and traffic concerns and proximity to the Broads were not previously viewed factors in limiting growth at Wroxham.

Transport impacts

Previous transport analysis does not support the case that this would lead significant traffic impacts on the local road network, including at the bridge over the River Bure. The County Council has commenced a programme of Market Town Network Improvement Strategies (NIS). These strategies identify short, medium and long-term actions including to consider issues associated with long-term growth with a number of market towns.

The Wroxham and Hoveton Network Improvement Strategy (NIS) (February 2020) has been supported by a robust body of evidence. This concludes that Wroxham and Hoveton collectively provide a highly sustainable location for development. It also identifies that the key areas of traffic congestion are north of the Bridge and that any strategic growth should therefore be to the south of the settlements, particularly as Norwich is the dominant direction of travel. In summary, the key points include:

- Wroxham and Hoveton is a highly sustainable location with good bus services (served by 16 bus stops, distributed on the main routes) which give access to high frequency services to higher order settlements including Norwich (there are also two rail stations in close proximity). This means that public transport is a realistic alternative to the private motor car. It concludes that **"overall, accessibility via public transport to town facilities is very good, and given the rural nature of Norfolk, the levels of accessibility were not seen as an issue for this strategy. Therefore, no further actions have been proposed."**
- In order to gain a better understanding of volume and nature of the traffic flow, Norfolk County Council recently commissioned an Automatic Number Plate Recognition (ANPR) traffic survey in the town centre to carry out an assessment of the existing traffic conditions. The key areas of congestion across the two settlements are north of the river - the A1151 Stalham Road / A1062 Horning Road / B1354 Horning Road W Junction was noted as being the worst.

- The weekday flow profiles of the A1151 show a tidal profile with the greater proportion of traffic heading south to Norwich in the AM peak and returning during the PM peak in the northbound direction.
- Therefore, the report concludes that: ***“The through traffic assessment shows that growth could be better facilitated in the south as the majority of traffic is travelling south towards Norwich in the AM peak hour and returning north in the PM peak period. Therefore, residents won’t have to travel through the town centre (Hoveton) and over the already congested historic bridge (emphasis added).”***

These results support Wood’s previous transport evidence. This utilised the same trip rates as used for Hopkin’s Homes “Land South of Wroxham” planning application (which were derived from a manual count of all in/out trips at Keys Drive), in order to estimate the potential traffic generation from the site. Table 1 below identifies the potential number of trips from a scheme of 100 new homes at land south of Wroxham.

Table 1 – potential trip generation from 100 homes

100 dwellings	Arrivals	Departures	Total
AM trip generation	19	36	55
PM trip generation (two way)	27	13	50

Wood’s previous transport modelling demonstrates that although new development would generate traffic, in percentage terms this would be modest and can be accommodated on the surrounding road network. The traffic distribution derived from the travel to work statistics identifies the following key highway routes as demonstrated in Table 2.

Table 2 – traffic distribution from 100 homes at South Wroxham AM and PM peaks

	% of trips	Number of trips (AM)	Number of trips (PM)
Southwards			
A1151 Norwich Road (South)	40	22	20
B1140 Salhouse Road (south)	16	9	8
Total south	56	31	28
Northwards			
Hoveton and beyond	29	16	15
Wroxham (internal)	15	8	7
Total north	44	24	22

The table shows that over half of all traffic would be expected to head south towards Norwich. Whilst some trips will head north, 15% of these are expected to be internalised before crossing the bridge. Therefore, as a worst-case scenario in the AM peak, at most a development of up to 100 units would be expected to generate around 16 trips crossing the bridge. At an average of around 1 additional car every four minutes in the peak hour, this cannot be considered ‘severe’ in the context of the NPPF (paragraph 109) and suggest that development should be precluded on highways grounds.

The Wroxham and Hoveton NIS (February 2020) also assesses the capacity of existing junctions. The strategy identifies that the current arrangements of junctions along the main arterial routes, including numerous minor roundabouts and pedestrian crossings, do not manage the free flow of traffic effectively particularly north of the bridge. Consequently, the report identifies potential mitigation measures to enable future growth. This includes a potential enhancement to the local road network through an action plan. An immediate priority is the Stalham Road/Horning Road junction to the north which experiences most congestion.

However, it also identifies the A1151 Norwich Road / B1140 Salhouse Road mini roundabout as a medium-term priority. It notes that this mini roundabout is close to capacity in the morning peak hour and is therefore unlikely to be able to accommodate future traffic growth. It suggests a feasibility study with one possible solution to congestion at this junction being to introduce traffic signals. However, without any development to contribute to the delivery, it is unclear how this might be funded. Development at South Wroxham could therefore help to mitigate this existing problem.

The conclusions that the traffic impacts at Wroxham would not be severe support the inspector's view when the issue was considered in the preparation of the current Joint Core Strategy for Broadland, Norwich and South Norfolk. The Local Plan Inspector's Report (November 2013) concludes at paragraph 87 that:

"Local people were concerned about traffic through the village of Wroxham on the A1151 Wroxham Road where it converges on the bridge between Wroxham and Hoveton, but no evidence was submitted to substantiate it, and nor did the Highway Authority object. The GNDP's response was that the construction of the NDR, the focus of growth on Norwich, and the provision of services and facilities within the proposed housing areas would mean that growth in this location would not directly pressure the A1151. The outputs from the Norwich Area Transportation Strategy Model showed very low traffic increases over Wroxham Bridge."

Proximity to the Broads

Land at Salhouse Road outperforms other options and has consistently been supported through the Council's extensive evidence base in preparing the current Development Plan as being one of the most sustainable locations for new development. In summary:

- The Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS): stated that Wroxham can comfortably accommodate between 100-200 new dwellings over the Plan Period to 2026 (Policy 14). A large area to the south of Wroxham was identified as being a suitable location for development.
- Site Allocations Plan (2016): Land to the south of Wroxham was allocated for 100 new homes under Site reference WRO1. The site has now been developed by Hopkins Homes following a grant of planning permission.

At each stage the proximity to the Norfolk Broads has been considered and, on each occasion, it has been concluded that the proximity of the Norfolk Broads was not a constraint to development. The Site Allocations Plan and planning application were considered under the same policy framework. Nothing has materially changed and there is no evidence in the emerging GNLP to support the assertion that development in this location would not be suitable. The Habitats Regulations Assessment of the Greater Norwich Regulation 18 Draft Plan (December 2019) does not raise objection to the growth strategy and provision of housing in terms of recreational pressure. In fact, it notes at section 5.5.1:

"Many of the habitats present in the designated sites of the broads are wet or very wet and unlikely to be favoured for recreation, with public usage almost entirely restricted to well managed nature reserves which feature boat-trails, footpaths and boardwalks. Most car parks serving the Broads / Broadland are

located in villages, where walking is not the prime attraction, or associated with nature reserves where visitors are well managed."

Around south Wroxham, public rights of way follow adjacent roads and there are no direct footpath links from south Wroxham to the wetland habitats associated with the Broads. The response to question 44 notes that development in this location would have a limited visual relationship with the Broads and can be accommodated without harm to the wider landscape setting. Due to environmental constraints around the settlement, namely flood risk, development opportunities are limited to the southern edge of the village. Land here is required to meet identified development needs.

Summary

Paragraph 35 of the NPPF sets out the four tests of soundness against which local plans will be assessed. This includes the tests of 'positively prepared' and 'effective'. In order for the plan to meet these tests the Local Plan should provide a responsive and flexible supply of housing to maintain housing delivery achieved through allocating more sites and making it clear that sustainable development (development in the right location, responding to needs and supporting the vitality of communities) will be supported.

The presumption in favour of sustainable development is therefore a significant consideration in the plan making process (NPPF, Paragraph 11). This states that "*plans and decisions should apply a presumption in favour of sustainable development.*" In this context, NPPF makes it clear that the sustainable development merits of a plan should be assessed against the policies in the Framework taken as a whole. With the evidence being weighted on transport and landscape issues, there is not sufficient evidence to suggest that the exclusion of Wroxham provides a holistic approach to meet the tests of soundness set out in NPPF. As noted above, we do not agree with the Council's assertion that development at Wroxham would result in substantial harm. We have demonstrated that any impacts that might result from the development can be mitigated (see also response to Question 44 below).

Additional allocations, including Hopkins Homes' land at Wroxham can assist in planning positively to meet development needs, including the needs of the growing elderly population and affordable housing. We consider that there may be a number of benefits in identifying additional greenfield sites at Wroxham. These include:

- There are extensive areas of unconstrained land at south Wroxham that can deliver homes quickly to boost supply and assist in maintaining a positive five-year supply position.
- This is an attractive area to the market and is likely to deliver the homes needed.
- It is a highly sustainable location with good transport public links including high frequency bus services to Norwich.
- The land at south Wroxham is deliverable and is in single ownership allowing comprehensive planning and delivery.

Q16: Do you support, object or wish to comment on the approach to review and Five-Year Land Supply?

Hopkins Homes does not agree with the Council's five-year land supply position. It is considered that the calculations have not been undertaken correctly in line with the Planning Practice Guidance and make the

following comments to ensure the Plan's soundness. With regard to the five-year supply in the context of plan making:

- **We agree that the five-year land supply should be monitored for the whole GNLP area:** In line with the planning practice guidance it is appropriate to assess the 5-year requirement against the LHN (Paragraph: 005 Reference ID: 68-005-20190722). In defining the monitoring area, it is considered that calculating the housing need across the whole GNLP area would be consistent with the Planning Practice Guidance (Paragraph: 013 Reference ID: 2a-013-20190220) which states that Local housing need assessments may cover more than one area, in particular where strategic policies are being produced jointly. Hopkins Homes agrees that it is appropriate, particularly as there is currently a joint core strategy but it also follows that past performance should also be considered for the whole GNLP area rather than individual authorities.
- **We do not consider that the five-year land supply calculation has applied the correct buffer:** the Council has only applied a 5% buffer. Whilst this is acceptable for the purposes of considering planning applications, the Planning Practice Guidance Paragraph: 010 Reference ID: 68-010-20190722 states that in confirming a 5 year housing land supply as part of the Local Plan examination process, local planning authorities should apply a minimum 10% buffer to their housing requirement to account for potential fluctuations in the market over the year and ensure their 5 year land supply is sufficiently flexible and robust.

Although not necessarily relevant for the context of the Local Plan preparation, we are also concerned that the five-year land supply calculation has not considered the shortfall in housing delivery for development control purposes. Notwithstanding the Council's view that the five-year requirement does not need to consider shortfall, it is considered that the GNLP is applying the Planning Practice Guidance incorrectly. Whilst it is correct that the LHN has already applied the affordability ratios and shortfall does not need to be considered as part of the overall Local Plan housing target, the Planning Practice Guidance (Paragraph: 031 Reference ID: 68-031-20190722) clearly states that level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgfield approach).

In line with the above guidance, a re-worked five-year supply calculation is provided in Table 3 below for the whole GNLP area.

Table 3 Re-worked GNLP five-year housing land supply calculation based on Sedgfield method

	Target
A. Requirement from start of Plan Period	16,346
B. Completions since start of Plan Period	14,655
C. Shortfall/surplus	-1691
D. Five-year requirement plus shortfall	11,811

e. Plus 5% Buffer (HDT)	590
F. Annualised requirement	(12401/5) 2,480
G. Deliverable Supply within five years	12,526
I. Years supply	5.05

Given the level of persistent under delivery since the adoption of the JCS, latest information confirms that the GNLP area only has a very marginal 5.05-year supply when the Sedgefield method is applied (February 2020). This figure does not include any assessment of the deliverability of the Council's supply or assumptions on delivery rates. These factors could further exacerbate the Council's supply position.

The NPPF indicates that relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a 5-year supply of deliverable sites. Even with the Council's own assessment it can only identify a marginal five-year supply of 5.89 years (5% buffer and no shortfall). Therefore, unless a favourable five-year supply position can be maintained, the Local Plan could be immediately out of date once adopted and would be ineffective. This could leave the GNLP area vulnerable to speculative applications. To provide a more positive strategy which significantly boosts housing supply, the Plan will need to adopt a higher rate of growth and allocate additional sites to significantly boost supply in order maintain a favourable five-year supply position.

Recent appeals in the GNLP area have also highlighted concerns regarding the robustness of the Council's housing supply. During an appeal for land west of Salhouse Road, Little Plumstead, Norwich (development of 84 dwellings *Appeal Ref: APP/K2610/W/18/3207888*) the Inspector noted some concerns about housing supply across the Greater Norwich Area, it was noted that the housing supply would be tested through the examination of the emerging Local Plan. In a subsequent appeal decision from December 2019 *Appeal Ref: APP/K2610/W/19/322669 relating to Land to the east of Manor Road and to the south of Newton Street, Newton St Faith* the Inspector notes concerns relating to the ambiguity of the Council's housing supply (paras 21-25):

"I am concerned about the ambiguity that remains. Namely surrounding the fact that not all of the Council's that make up the Greater Norwich Partnership have endorsed the interim statement, information on some sites is outstanding and ultimately the interim position has not been interrogated in detail sufficient for me to be satisfied that the Council are in a position to demonstrate the supply of housing sites required."

The Planning Practice Guidance (Paragraph: 031 Reference ID: 68-031-20190722) states that where strategic policy-making authorities are unable to address past shortfalls over a 5 year period due to their scale, they may need to reconsider their approach to bringing land forward this could include; re-prioritising reserve sites which are 'ready to go'. Hopkins Homes' land is available now and deliverable within the next five years (see response to Question 44 below). Hopkins Homes has a long and successful track record of delivering development sites in the GNLP area and this land can be brought forward quickly to boost supply.

Question 44 - do you support or object or wish to comment on the approach for specific key service centres - Wroxham

Hopkins Homes has previously submitted two site options in response to the Call for Sites as part of the GNLP preparation:

- ▶ **Site GNLP2131 - Land east of Wherry Gardens:** a rectangular parcel of land south of properties in Keys Drive and abutting Salhouse Road to the west and The Avenue to the south.
- ▶ **Site GNLP2135 - Land south of Wherry Gardens:** a square parcel of land which is by bound Hopkins Homes' Wherry Gardens development to the north and Salhouse Road to the east, whilst the western boundary abuts the railway line.

High-level Concept Masterplans have been prepared to demonstrate the potential of these sites to assist the Council in meeting its development needs (see **Appendix A**). They have been developed on the basis of some technical work and desktop analysis and demonstrate the suitability of the sites and have considerable merit.

However, the Wroxham Site assessment published as part of the GNLP consultation conclude that these sites are not suitable for development citing landscape and traffic impacts as being reasons for restricting growth in Wroxham. The conclusion is not consistent with the Council's evidence base. The Council's Housing Employment Land Availability Assessment (HELAA) do not identify issues which would preclude development on the sites and conclude that the development is suitable. The Council's own evidence is inconsistent and the Draft GNLP cannot be considered robust.

We have a number of concerns about the way in which alternative options have been considered through the Sustainability Assessment process. It is important that the SA is robust and is able to withstand scrutiny to justify the Council's preferred approach and assessment of other reasonable alternatives. Whilst it is recognised that the SA process is subject to a degree of professional judgement it is important that the SA deals with alternative options in a comparable manner to ensure the plan is fully justified to meet the tests in the NPPF (paragraph 35). Our concerns relating to each site are dealt with in turn below.

Site GNLP2131 - Land east of Wherry Gardens

The site was discounted on the basis of:

"This site could have potential for allocation subject to rationalisation of the Salhouse Road junction with Preston Close and Keys Drive, along with an acceptable access strategy. There is a safe route to school, although the site is at the limits of an acceptable distance. However, the site is not considered to be suitable for allocation as it is considered that traffic constraints and proximity to the Broads restricts additional growth in Wroxham."

This conclusion is contrary to the Council's own evidence including the HELAA which concludes that *"the site is suitable"*. We agree with the conclusion that the site is suitable, in particular that traffic and landscape should not preclude development in this location. Each of these issues are considered in turn below.

- ▶ **Traffic:** As noted in our response to Question 13 above, the Wroxham and Hoveton NIS does not conclude that no development should be located here. Conversely it concludes that the through traffic assessment shows that growth could be better accommodated in the south as the majority of traffic is travelling south towards Norwich in the AM peak hour and returning north in the PM peak period.

Moreover, it recognises some junctions are in need of improvement and growth in the village could assist with funding junction improvements to deal with existing issues and facilitate growth.

- ▶ **Access:** Wood has undertaken an assessment of access opportunities and this demonstrates that a safe and suitable access to the site can be gained. The extensive road frontage to the site offers a number of access solutions. The concept plan shows the main site access could be taken from Salhouse Road. The access strategy has been informed by a desire to locate the main access in the more 'urban' part of the site fronting existing residential development at Wherry Gardens. The design of the access to the Wherry Gardens development sought to facilitate additional future development to the east of Salhouse Road, providing vehicular and pedestrian connections. The main access is proposed to connect onto Salhouse Road and will absorb the existing priority access currently serving the Wherry Gardens development. This could either be in the form of a crossroads or roundabout depending on the scale of development proposed. A roundabout can be accommodated in this location as shown on the access design in **Appendix B**. The vertical and horizontal alignment of the road in this location are favourable and would enable a safe access and egress to the site. An emergency access can also be provided to connect onto the southern boundary of the site from The Avenue.
- ▶ **Landscape:** The site is predominantly viewed from close proximity (i.e. through gaps in hedgerows, the local road network and adjacent residential properties). The site has a limited visual relationship with the Wroxham Broad due to the presence of intervening hedgerows and the topographical relationship between the site and Broads (i.e. gently sloping towards The Broads). Built form on the edge of Wroxham (including new built development off Salhouse Road) is barely perceivable through dense hedgerows from Wroxham Broad (**Appendix C**).

The urban edge of Wroxham is predominantly residential with a 'hard' urban edge formed by backs of properties without vegetation and is characterised by domestic paraphernalia in rear gardens. There is significant potential to improve the visual quality of the 'gateway' into the village. A high-quality landscape scheme including on land to the south of the site would provide a rounding off of the settlement edge in this location. This could utilise and augment existing hedgerows to improve the landscape setting of this location– see plan in **Appendix C**.

Site GNLP2135 - Land south of Wherry Gardens

The site was discounted on the basis of:

"This site is adjacent to the existing allocation, there is a safe route to school but the site is at the limits of an acceptable distance. The site is not considered to be suitable for allocation as it would result in a significant southwards elongation of development into the countryside. The site also has an unbalanced development frontage and would require inappropriate extension to the speed limit and visibility requirements which would be excessive to mitigate risk. In addition, traffic constraints and proximity to the Broads restricts additional growth in Wroxham."

This conclusion is also contrary to the Council's own evidence including the HELAA which concludes that *the site is suitable for residential development. We do not consider that* traffic and landscape factors should preclude development in this location. Each of these issues are considered in turn below.

- ▶ **Traffic:** as noted above development at South Wroxham would be preferred and development in this location can help to fund local junction improvements.
- ▶ **Access:** The main access to the site can be taken from the existing Wherry Gardens to the north through a continuation of the main estate road which has been designed to anticipate development. There is also a frontage onto Salhouse Road to the east which could provide a secondary access/pedestrian cycle links or main access if required.

A preliminary access design for land south of Salhouse Road is provided in **Appendix D**. Visibility requirements have been based on the 85th percentile speeds recorded along the Salhouse Road through the recent speed survey undertaken by Hopkins Homes in 2019 (recorded as 47mph averaged between north and southbound). This is consistent with speeds recorded as part of the planning application preparation for land at Wherry Gardens in 2012. This means guidance set out in the DMRB TD 42/95 needs to be applied for 85kph roads, which specifies a visibility requirement of 160m.

The preliminary access design demonstrates that these parameters can be met. The vertical and horizontal visibility to the south is not a constraint. Furthermore, other measures could be introduced including, a reduction of the speed limit south down Salhouse Road or a phased speed limit with a new 40mph zone south near to the bend on Salhouse Road. These measures would reduce visibility requirements further.

- ▶ **Landscape:** As with site GNLP2131, this site has a limited visual relationship with the Wroxham Broad due to the presence of intervening hedgerows and the topographical relationship between the site and Broads (i.e. gently sloping towards The Broads). It is set within a context of urban development including railway infrastructure and Norwich Road. Development in this location can also assist in enhancing the southern gateway to the village.

A number of large mature hedgerow oaks and some intact hedgerows can be retained and enhanced within the new development. This would provide a mature landscape setting for a new settlement edge. This could be augmented to reduce landscape impacts further – **see plan in Appendix C**.

The Broads Authority has not objected to the site concluding that: *“the Site is an extension to existing new development and remote from Broads, with no visibility from Broads area. Unlikely to impact adversely on Broads in terms of heritage.”*

Whilst the Neighbourhood Plan does not include site specific allocations, the draft version stated that public opinion shows that any large-scale development should be located south of Wherry Gardens. This was a clear local expression that this is the preferred location for development.

In summary, these options have significant potential to assist the Council in meeting its substantial development needs. The sites provide a highly deliverable and developable location in line with guidance in the NPPF. In particular, the sites are available now, they offer a suitable location for development and are achievable with a realistic prospect that housing will be delivered within five years. It should also be recognised that the scenarios identified in the Concept Masterplans are only one possibility of how the sites could be developed. They could work in combination or individually to meet a range of development needs or spatial scenarios.

Appendix A

Concept Plans





- Key
- Site boundary (5.59 ha)
 - SUDS
 - Main roads
 - Secondary roads (lanes)
 - Public Right of Way
 - Development site road network
 - Bus stops
 - Existing hedgerows/trees
 - New trees
 - Footpaths
 - ⇄ Footbridges
 - POS = 1.61 ha (28.80%)
 - Residential area = 3.98 ha



Client



Land at Salhouse Road
Wroxham



Indicative concept plan
East of Wherry Gardens Site



Key	
	Site boundary (5.95 ha)
	SUDS
	Main roads
	Secondary roads (lanes)
	Public Right of Way
	Development site road network
	Existing hedgerows/trees
	New trees
	Footpaths
	Footbridges
	POS = 1.95 ha (32.77%)
	Residential area = 4.00 ha

0 m 100 m
 Scale 1:2000 @ A3

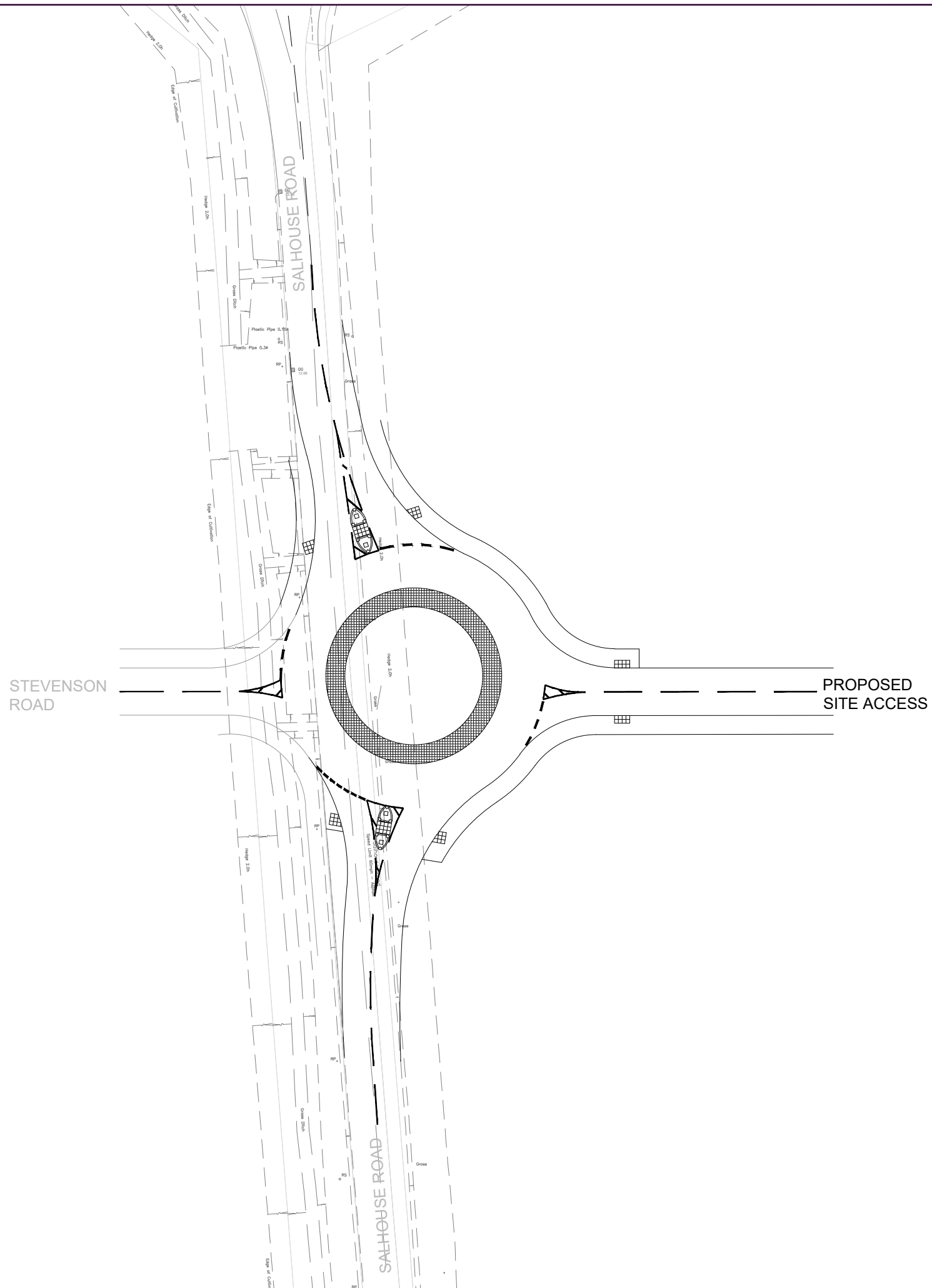
Client

Land at Salhouse Road
 Wroxham


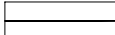

Indicative concept plan
 South of Wherry Gardens Site

Appendix B

Access option for land east of Salhouse Road



Key

-  Existing
-  Proposed
-  Overrun area

Land at Salhouse Road,
Wroxham



Preliminary site access design

Salhouse Rd / Stevenson Rd / Site
access roundabout

Appendix C

Views of Site and Potential Landscape Enhancements

View 1 – A view east towards Wroxham Broad from within land east of Salhouse Road



View 2 – A view south west from the Public Right of Way



View 3 – A view west from Wroxham Broad (Norfolk Broads Yacht Club) towards Salhouse Road



View 4 – A view east from Salhouse Road

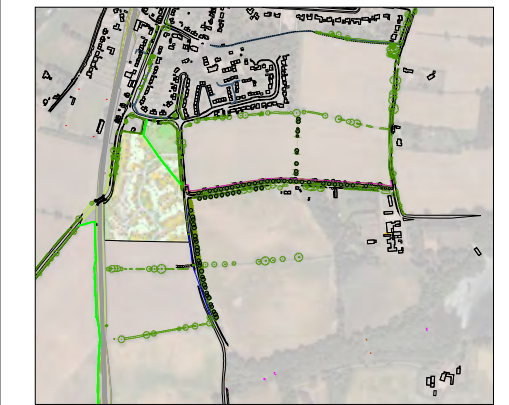




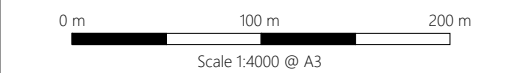
KEY

-  Existing trees
-  Existing hedgerows
-  Public Right of Way
-  Proposed tree species
-  Proposed species rich grassland
-  Proposed re-instated hedgerow
-  Proposed pathway
-  Proposed fenceline

LOCATION PLAN



DRAFT



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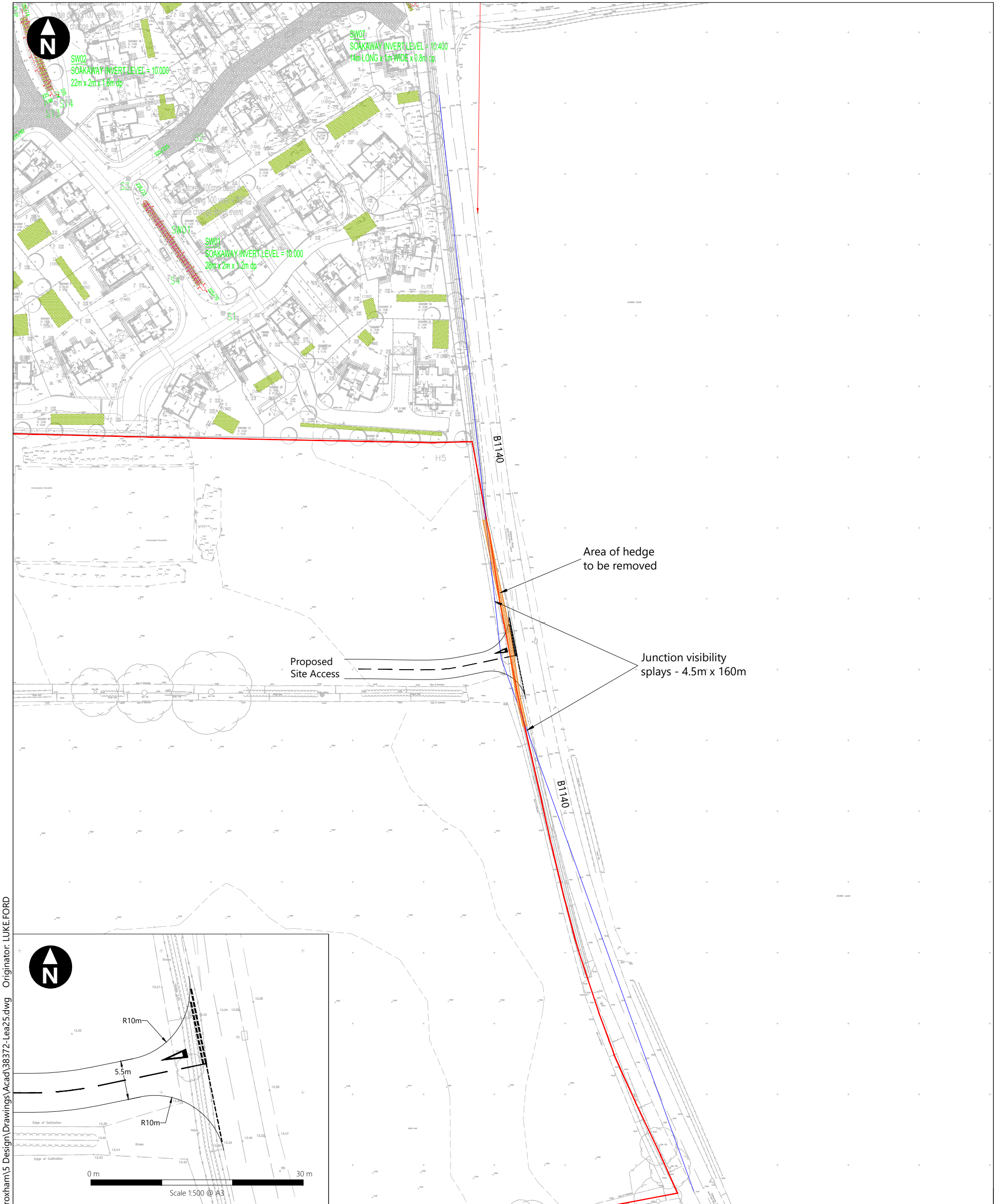
Wroxham, Salhouse Road

Proposed Landscape Treatment Overview


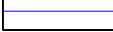

August 2019

Appendix D

Access option for land south of Wherry Gardens



H:\Projects\38372 Land at Salhouse Road, Wroxham\5 Design\Drawings\Acad\38372-Lea25.dwg Originator: LUKE FORD

- Key
-  Site boundary
 -  Visibility (4.5m x 160m)
 -  Hedge clearance area

85th percentile speeds along the B1140 north and southbound have been recorded at 47mph. Visibility requirements are therefore based on standards for 85kph design speed set out in Table 2.10 within the DMRB CD 109 Vol 6 Section 1.

Land at Salhouse Road, Wroxham

Vehicular Access Design

March 2020

