

**GNLP
Submission
Strategy
Statement**

Land at Rear of
Hill Farm
Wroxham Road
Rackheath
Norfolk
NR13 6NE

Prepared for
Claire Taylor and
Peter Taylor

Date
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Our Reference
GWBG/jf/25911/141

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	CONTENTS	PAGE
1.0	INTRODUCTION	
2.0	SITE AND CONTEXT	
3.0	DESIGNATIONS AND CONSTRAINTS	
4.0	SUITABILITY INCLUDING ASSESSMENT OF POTENTIAL 'CONSTRAINTS' & 'IMPACTS'	
5.0	ASSESSMENT OF AVAILABILITY	
6.0	ASSESSMENT OF ACHIEVABILITY (INCLUDING VIABILITY)	
7.0	SUMMARY	

APPENDICES

Appendix A – Site Assessment Proforma

Appendix B - Extract HELAA December 2017

1.0 INTRODUCTION

- 1.1 The Greater Norwich Local Plan (GNLP) is being produced by **Broadland District Council**, (hereafter BDC), Norwich City Council and South Norfolk District Council working together with Norfolk County Council through the Greater Norwich Development Partnership (GNDP).
- 1.2 The GNLP will cover the period to 2038 and will identify sites for new homes, jobs and infrastructure. As well as welcoming the submission of new sites for potential allocation in their Local Plan as part of the GNLP Regulation 18 'Preferred Options' stage consultation, the consultation document also identifies those site that it currently 'prefers' for allocation in addition to those 'known' sites that they currently consider 'unreasonable' for allocation.
- 1.3 Our client notes the identification of their site (GNLP0042 – Land at rear of Hill Farmhouse, Wroxham Road) as an 'unreasonable option' for meeting the emerging housing requirement at this stage in the emerging Local Plan's preparation.
- 1.4 The intention of this statement is to affirm the suitability, availability and achievability of the site GNLP0042 for inclusion within the GNLP and the evidence base documents the that will inform its preparation. The consultation itself commenced on 29th January 2020 and will close on the 16th March 2020.
- 1.5 This statement has been prepared in order to satisfy the requirements of the joint Norfolk Housing and Economic Land Availability Assessment Methodology (HELAA, 2016) in addition to the requirements of the consultation response form issued as part of the current Regulation 18 stage consultation.

2.0 SITE AND CONTEXT

- 2.1 The site comprises agricultural land and is bound immediately to the south (and is accessed via) Wroxham Road (A1151). The new Norwich Distributor Road (NDR) lies just 150 metres or so from the site's eastern boundary. The site area measures 4.28 hectares and is being promoted for residential use.



Fig.1 Plan illustrating the position of or client's site (GNLP0042) in relation to the junction with the Norwich Distributor Road (NDR) to the east and Wroxham Road to the South. Source: GNLP Reg. 18 Consultation Interactive Map.

3.0 DESIGNATIONS & CONSTRAINTS

- 3.1 Policy 1.3 (2) (d) of the DMPD identifies that permission for development in the countryside (i.e. outside of the defined development boundaries of settlements) will only be granted if (it) otherwise demonstrates overriding benefits in terms of economic, social and environmental dimensions as addressed in Policy 1.1. Policy 1.1 seeks to ensure development contributes to achieving sustainable development.
- 3.2 Whilst it is considered that site GNLP0042 is a sustainable option for development (for the reasons outlined within this statement) whilst offering overriding benefits in economic, social and environmental terms, our client is seeking the allocation of their site via the Local Plan process and therefore such policy guidance 'constraint(s)' are of limited relevance.
- 3.3 The development site is identified by the Environment Agency as being within 'Flood Zone 1' in its entirety and as such the site is at low risk of flooding from surface water.
- 3.4 There are no Historical buildings in close proximity of the site and there are no archaeological records pertaining to the site according to the Norfolk Heritage Explorer website.
- 3.5 Sprowston Neighbourhood Plan was 'made' in May 2014 and covers the period to 2026. The vision for the Neighbourhood Plan is by 2026 the community of Sprowston will be strong, cohesive, creative and forward-looking. The community will be safer, healthier, more prosperous, sustainable and inclusive. High quality homes will meet people's needs and aspirations in attractive and sustainable places. People will have access to good quality jobs, essential services and community facilities, with less need to use a car. It is considered that the allocation of site GNLP0042 would assist in realising this vision.

4.0 SUITABILITY INCLUDING ASSESSMENT OF POTENTIAL 'CONSTRAINTS' & 'IMPACTS'

4.1 To assess the suitability of sites the HELAA methodology document (intended to accord with both local and national planning policy and guidance) prescribes a red, amber, green (RAG) approach to assessing various types of 'constraints' on a site's deliverability in addition to potential 'impacts' arising.

4.2 For a site to be 'taken forward' and included in the HELAA capacity assessment, sites are expected to achieve either an amber or green rating against all suitability criteria and furthermore, meet the availability and achievability 'tests'. Some sites will have constraints and impacts that are insurmountable and thus undermine their suitability for development.

4.3 Following the RAG assessment prescribed in the methodology, the LPA concluded within the context of the *HELAA December 2017* document (relevant extract to be found at appendix B):

Based on the site suitability analysis it is considered that this site is appropriate for the land availability assessment, subject to any caveats in the Suitability Conclusions.

4.4 Furthermore, the current Consultation Draft GNLP identifies:

This site is not suitable for allocation as it is located beyond the settlement and existing commitment. It is considered to be remote, disconnected from services and unsympathetic to the character of the area.

4.5 It is for these reasons that the site now appears as a 'unreasonable Option' within the context of the consultation draft GNLP. For the reasons outlined below, we consider the site suitable ('reasonable') for inclusion within the HELAA and GNLP. To affirm our client's site as a reasonable option, we have undertaken our own RAG assessment, intended to accord with the combined Authority methodology (2016).

Potential Site Constraints

4.6 Access to site – The access to the site will be taken from Wroxham Road immediately to the south. There is no evidence to suggest that securing an appropriate access will be problematic and there is adequate space to provide the requisite visibility splays in both directions along the Wroxham Road. **RAG assessment = Green.**

4.7 Access to Local Services and facilities – Sprowston form part of an area identified for significant growth in the JCS and is referred to as the Old Catton, Sprowston, Rackheath, Thorpe St Andrew 'Growth Triangle', on account of its relative sustainability for growth. The emerging GNLP identifies how Sprowston has a good range of services and facilities, principally based around the designated District Centre are *Blue Boar*.

- 4.8 The Sprowston Park and ride is only 1 mile to the west of the site along the Wroxham Road. The site is served via regular bus services/routes 11 & 12 on the 'Pink Line' (First Norfolk & Suffolk bus company) and there is an existing bus stop in very close proximity of the site. **RAG assessment = Green.**
- 4.9 Utilities Capacity – Although 'greenfield', the site relates well to the existing development and there is no evidence to suggest that utilities capacity will be a constraint. **RAG assessment = Green.**
- 4.10 Utilities infrastructure – Although 'greenfield', the site relates well to the existing development. There is no evidence to suggest that utilities infrastructure will be a constraint. The HELAA 2017 (Appendix B) assessment identifies sewerage infrastructure upgrades required to support growth. However, there is nothing to suggest that this cannot be considered and delivered in combination with other planned growth in this part of the sub-region. **RAG assessment = Green.**
- 4.11 Contamination – This is a 'greenfield site'. There are no known contamination or ground stability issues pertaining to the site. The HELAA (2017) identifies no concerns over potential contamination or ground stability (appendix B). **RAG assessment = Green.**
- 4.12 Flood Risk – The site lies within Flood Zone 1 in its entirety although an appropriate Flood Risk Assessment (FRA) is a likely requirement given the scale of the development. **RAG assessment = Green.**
- 4.13 Coastal Change – This site is located some distance from the coast and is not associated with any Coastal Hazard Zone(s) or similar. **RAG assessment = Green.**
- 4.14 Market Attractiveness – This is an extremely popular place to live with a demonstrable need for both market and affordable homes. Our client can confirm that development is viable. The site lies within CIL *Charging Zone A* which, in itself, would suggest that development in this is extremely viable. **RAG assessment = Green.**

Potential Site Impacts

- 4.15 Landscape/townscape – Any development would be sympathetic to existing development in the locality and consequently there is unlikely to be a detrimental impact on the townscape. As identified in the HELAA (2017) the site is adjacent to Ancient Woodland (Sprowston Wood) and opposite Historic Parkland (Rackheath Park). Any proposal would be informed by (among other) a comprehensive LVIA to mitigate any potential impact. **RAG assessment = Amber.**

- 4.16 Biodiversity and geodiversity – An arboricultural assessment will be required (on submission of any planning application) to establish (among other) the value of trees on the site boundaries. **RAG assessment = Green.**
- 4.17 Historic environment - There are no archaeological records pertaining to the site according to the Norfolk Heritage Explorer, albeit the LPA are likely to insist on a scheme of investigation, were the site to be allocated. There are no listed buildings in close proximity of the site. However, the site does lie in close proximity to Historic Parkland (Rackheath Park) and this will be a consideration as and when any scheme is developed. **RAG assessment = Green.**
- 4.18 Open Space – The site is not the subject of any ‘open space’ designation(s). Appropriate and accessible open space will be provided in accordance with local planning policy and guidance in due course and subject to successful inclusion within the context of the Local Plan as an allocation. **RAG assessment = Green.**
- 4.19 Transport and Roads – There is no evidence to suggest that the development will have an unacceptable impact on the local highways network although engagement with the local highway authority will be ongoing through to allocation/planning application. A transport Assessment would be submitted at the appropriate stage to assess the impact of the proposed development on the wider road network. As has been explained, the site is extremely accessible via the existing road network including the relatively new NDR, the junction of the Wroxham Road with the NDR being a matter of only 150 metres from the site. **RAG assessment = Green.**
- 4.20 Compatibility with neighbouring uses – The proposed development will be entirely compatible with the neighbouring land uses, both existing and planned for, in this part of the sub-region that is intended to be a ‘focus’ for growth in the plan period. **RAG assessment = Green.**
- 4.21 The above ‘suitability’ criteria are just one element of the assessment for the HELAA. In addition to establishing whether sites are potentially suitable for development, sites are also assessed in terms of whether they are ‘available’ for development and whether they are ‘achievable’.

5.0 ASSESSMENT OF AVAILABILITY

5.1 A site will normally be considered available by the Council if it is in the ownership of a developer or landowner who has expressed an intention to develop or sell land for development. This site is under the control of a landowner who is actively promoting the site for development within the emerging GNLP process.

6.0 ASSESSMENT OF ACHIEVABILITY (INCLUDING VIABILITY)

6.1 A site will be considered achievable within the context of the HELAA where there is a reasonable prospect that development will occur on the site at a point in time. A key determinant of this will be economic viability of the site. This will be influenced by the market attractiveness of a site, its location in respect of property markets and any abnormal constraints on the site. It is considered that development on this site is viable, being in an area with considerable demand for both market and affordable dwellings. Furthermore, there are no abnormal constraints pertaining to the site (i.e. 'reds' in the context of the RAG assessment – see section 4 above).

7.0 SUMMARY

7.1 It is trusted that this report has affirmed, in line with both national and local planning considerations, that our client's site (Land at rear of Hill Farm House – GNLP0042) is available, achievable and suitable for inclusion within the context of the next HELAA capacity assessment and as a future allocation within the context of their emerging GNLP.

7.2 We consider that the site would make a valuable contribution to housing land supply and assist in meeting GNLP's growth aspirations for this Norwich suburb in the plan period to 2038.

Land at Rear of Hill Farm, Wroxham Road, Rackheath, Norfolk NR13 6NE
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APPENDIX A **SITE ASSESSMENT PROFORMA**



Site Assessment Proforma

Site Address: Land at rear of Hill Farm, Wroxham Road, Rackheath, Norfolk NR13 6NE	
Current Planning Status	'Unreasonable' site emerging GNLP (GNLP0042)
Site Size (Ha.)	4.28 ha
Greenfield/PDL	Greenfield/Agricultural
Ownership	
Absolute Constraints Check	
SPA, SAC, SSSI or Ramsar	N/A
National Nature Reserve	N/A
Ancient Woodland	N/A
Flood Risk Zone	N/A
Scheduled Ancient Monument	N/A
Statutory Allotments	N/A
Locally Designated Green Space	N/A
At risk from Coastal Erosion	N/A
Development Potential (No. units): To be determined.	
Density Calculator	

Suitability Assessment		
Constraint	Score (RAG)	Comments
Access	Green	See Above
Accessibility	Green	See Above
Utilities Capacity	Green	See Above
Utilities Infrastructure	Green	See Above
Contamination/Stability	Green	See Above
Flood Risk	Green	See Above
Coastal Change	Green	See Above
Market Attractiveness	Green	See Above
Impact	Score (RAG)	Comments
Landscapes	Amber	Amber
Townscape	Green	See Above
Biodiversity/Geodiversity	Green	See Above
Historic Environment	Green	See Above
Open Space	Green	See Above
Transport & Roads	Green	See Above
Compatibility	Green	See Above

Local Plan Designations		
Designation	Policy Reference	Comments
Emerging GNLP 'unreasonable' site	GNLP0042	The landowner supports the allocation of site GNLP0042
Availability		
Is the site being marketed?	Yes	
When might the site be available?	Immediately	
Estimated annual build-out rate	Site can be delivered in years 1-5.	
Achievability (including viability)	See above	
Overcoming Constraints	See above	
Trajectory of development	Within 5 years	
Barriers to delivery	None	
Theoretical Capacity	TBC	

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APPENDIX B
EXTRACT HELAA DECEMBER 2017

Extract HELAA, December 2017

Sprowston Suitability Assessment

Site reference	GNLP0042	Site Area	4.82 hectares
LOCATION		PROPOSED DEVELOPMENT	
Land at Rear of Hill Farm House Wroxham Road Sprowston Norwich Norfolk		Residential development for an undetermined number of dwellings.	
District	Broadland		

CONSTRAINTS ANALYSIS

Access	Amber
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Green
Market Attractiveness	Green

IMPACTS ANALYSIS

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

SITE SUITABILITY CONCLUSIONS

The site is greenfield land off the Wroxham Road beyond the settlement therefore, considered slightly disconnected from services and character of the area but within an area of significant growth expected. Initial highway evidence has highlighted concerns that there are potential access constraints on the site, but these could be overcome through development the site is considered to be remote from services for housing development so development here would be likely to result in an increased use of unsustainable transport modes. There are no concerns over potential contamination, ground stability or loss of high quality agricultural land. However, it is adjacent to Ancient Woodland (Sprowston Wood) and opposite of Historic Parkland (Rackheath Park) therefore, significant constraints for ecology and landscape character. Other constraints include sewerage infrastructure upgrades required to serve proposed growth. There are number of constraints but as these may be possible to mitigate the site is concluded as suitable for the land availability assessment.

For the purposes of the HELAA capacity assessment this site is considered to be SUITABLE

Sprowston

Availability and Achievability Assessment

Availability and Achievability Conclusions

The proposer has indicated that the site is likely to be AVAILABLE in the following timescale:	Immediately	(timescales have not been specified by the proposer if these fields left blank)
The proposer has indicated that the site is likely to be DEVELOPABLE in the following timescale:	Immediately	

In terms of site viability, this site has been submitted by a landowner/promoter as viable for the form of development proposed and is assumed to be developable within the plan period in accordance with the timescales above (where given). Further area-wide work on viability typologies will be done as plan-making progresses and will inform decisions on viability.

Overall Conclusions for Site GNL0042

Based on the site suitability analysis it is considered that this site is appropriate for the land availability assessment, subject to any caveats in the Suitability Conclusions.