

Land Between Fir Covert Road & Reepham Road
M Scott Properties Ltd
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March 2020



GREATER NORWICH LOCAL PLAN REGULATION 18 (C) (GNLP0337) REPRESENTATIONS ON BEHALF OF M SCOTT PROPERTIES LTD



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DELIVERY STATEMENT PREPARED BY SCOTT PROPERTIES

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ILLUSTRATIVE MASTERPLAN PREPARED BY BROWN & CO

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REVISED RED LINE PLAN

1.0 Introduction

- 1.1 On behalf of M Scott Properties Ltd, we are instructed to submit representations to the draft Greater Norwich Local Plan Regulation 18 (c) consultation. The representations are split into two, reflecting the two parts of the Greater Norwich Local Plan; the Strategy Document and the Sites Plan.
- 1.2 Whilst comments have been submitted online, the following document provides a complete record of the representations made on behalf of M Scott Properties Ltd

PART 1

2.0 Response to the draft Greater Norwich Local Plan – Strategy Document

<u>QUESTION</u>	<u>RESPONSE</u>
<p><u>6</u></p> <p>Do you support or object to the vision and objectives for Greater Norwich?</p>	<p>Support, with comments</p> <p>The objective of delivering high quality homes that contribute to the delivery of mixed, inclusive, resilient and sustainable communities that are supported by appropriate economic and social infrastructure is fully supported. The approach is fully consistent with the National Planning Policy Framework.</p>
<p><u>9</u></p> <p>Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?</p>	<p>Support, with comments</p> <p>The requirement that sites should only be allocated for housing where, having regard to policy requirements, there is a reasonable prospect that housing can be delivered fully accords with para 67 of the NPPF and is supported.</p> <p>Whilst the submission of Delivery Plans as part of a planning applications is supported the documents need to recognise that there may be unforeseen material changes in circumstances, which could impact the delivery of an allocation.</p> <p>The Council's approach to providing choice and flexibility in terms of housing growth by accommodating 9% more homes than are needed (increasing to 10% at the Regulation 19 stage), is supported. This buffer will help maintain the supply and delivery of housing in accordance with the NPPF and specifically the Government's objective of encouraging authorities to consider more growth than required to meet local housing need, particularly where there is potential for significant economic growth. This is particularly relevant given the under delivery of housing in the Greater Norwich Area between 2011 and 2019.</p>

<u>QUESTION</u>	<u>RESPONSE</u>
<p><u>11</u></p> <p>Do you support, object, or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?</p>	<p>Support, with comments</p> <p>Whilst there is support, in principle, for the proposed approach to infrastructure, particularly the need for key stakeholders to work collaboratively, the Delivery Statement should make it clear that infrastructure requirements will be proportionate to each development and based on clear assessments of need. In addition, the Delivery Statement should recognise the impact that significant infrastructure costs can have on the viability and deliverability of large strategic sites.</p>
<p><u>12</u></p> <p>Do you support, object, or have any comments relating to the Climate Change Statement?</p>	<p>Support</p> <p>The strategic policy is considered to provide a framework to ensure communities developed and infrastructure delivered under the plan will be resilient to the impacts of climate change.</p>
<p><u>13</u></p> <p>Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?</p>	<p>Support</p> <p>The proposed Settlement Hierarchy is fully supported. Norwich and the Norwich Fringe, which includes Taverham, is the most sustainable location within the Greater Norwich area and is the focus for significant economic growth. Norwich is the catalyst for economic growth in the area and provides a range of amenities, services and infrastructure to support sustainable housing. Accordingly, it is wholly appropriate and consistent with Government Guidance that it should be identified as the preferred location to accommodate 69% of the housing growth during the period to 2038.</p> <p>The identified Settlement Hierarchy will also ensure consistency with the draft Local Plan's Climate Change policy.</p>

<u>QUESTION</u>	<u>RESPONSE</u>
<p><u>14</u></p> <p>Do you support, object or wish to comment on the approach for housing numbers and delivery.</p>	<p>Support</p> <p>See comments made in relation to Question 9.</p>
<p><u>16</u></p> <p>Do you support, object or wish to comment on the approach to Review and Five-Year Land Supply?</p>	<p>Support, with comments.</p> <p>The proposed review of the plan within 5 years of adoption is fully consistent with paragraph 33 of the NPPF. In addition, we agree that, given the joint approach to the preparation of the draft GNL0, the assessment of 5 year land supply should continue to cover all 3 administrative areas.</p>
<p><u>17</u></p> <p>Do you support, object or wish to comment on the approach to Infrastructure?</p>	<p>Support, with comments</p> <p>The need to support sustainable growth through the provision of infrastructure improvements, such as schools and health centres, is, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery.</p> <p>When considering infrastructure, consideration should be given to whether it is viable for some of the larger strategic sites, which have high infrastructure costs associated with their delivery i.e. the requirement to provide schools and health centres on land which otherwise would be land developable for alternative uses, to pay the Community Infrastructure Levy, in addition to the policy requirements of the Local Plan.</p> <p>The potential for infrastructure costs which are specific to larger strategic sites to be secured by appropriate and negotiable Section 106 planning obligations, in order to ensure that such sites are deliverable and,</p>

<u>QUESTION</u>	<u>RESPONSE</u>
	<p>importantly, that there is certainty regarding the timely delivery of the infrastructure on site, should be fully explored. This approach, which has been adopted by Mid Suffolk District Council, is entirely consistent with the Community Infrastructure Regulations (2019).</p>
<p><u>18</u></p> <p>Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?</p>	<p>Support, with comments</p> <p>The principle of ensuring that developments are high quality and contribute to delivering inclusive growth in mixed, resilient and sustainable communities, whilst assisting in mitigating and adapting to climate change is supported. To demonstrate the ability to secure these objectives, we support the preparation of a Sustainability Statement as part of an application for a major development. The use of master planning, in conjunction with community engagement, and provision of Delivery plans is also supported.</p> <p>Whilst the requirement to ensure the efficient use of land by, amongst other things, providing an indicative minimum density of 25 dwellings per hectare, is supported, the policy, or supporting text, should make it clear that, as well as giving consideration to on site characteristics, consideration will be given to a range of other site / scheme specific issues, such as housing mix and design considerations. For example, the inclusion of bungalows within a development to meet an identified need is likely to result in a lower density development, although a density of 25 dwellings per hectare should still be achievable on a net basis.</p>
<p><u>19</u></p> <p>Do you support, object or have any comments relating to specific requirements of the policy.</p>	<p>Comments</p> <p>See comments made in relation to Question 9.</p>

<u>QUESTION</u>	<u>RESPONSE</u>
<p><u>24</u></p> <p>Do you support, object or have any comments relating to the approach to other strategic sites infrastructure (energy, water, health care, schools and green infrastructure)?</p>	<p>Comments</p> <p>Clarification is required as to the extent of education contributions likely to be required.</p> <p>Paragraph 229 states that <i>“if a new development is likely to generate enough children to fill a new school, Norfolk County Council asks developers for the full cost of building that school.”</i> However, the paragraph goes on to state that <i>“with the current CIL approach locally, only land can be secured through a S106 agreement and the build cost of the new school is claimed through CIL.”</i></p> <p>From discussions with NCC Education and the GNLP it is understood that when a new School is required the situation will remain as existing i.e. the developer will be expected to provide the land for the School, with the construction being funded through CIL. If this position has changed, it will have significant implications for viability.</p> <p>The flexibility provided in relation to provision of new schools (para 231), ensuring that they are only provided as and when they are required is fully supported.</p> <p>See comments made in relation to Question 17.</p>
<p><u>25</u></p> <p>Do you support, object or have any comments relating to the approach to on-site and local infrastructure, services and facilities?</p>	<p>Support, with comments</p> <p>The need to support sustainable growth through the provision of infrastructure improvements, such as schools and health centres, is, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery.</p> <p>See comments made in relation to Question 17.</p>

<u>QUESTION</u>	<u>RESPONSE</u>
<p><u>28</u></p> <p>Do you support, object or have any comments relating to the approach to space standards?</p>	<p>Comments</p> <p>Whilst the general principle of providing development that adheres to space standards is supported, the policy should incorporate a degree of flexibility to ensure that consideration is given to site specific issues, as well as need and financial considerations. For example, there may be circumstances where there is a clear need for homes which fall below the space standards. The lack of flexibility within the policy would prevent this need from being satisfied.</p>
<p><u>29</u></p> <p>Do you support, object or have any comments relating to the approach to accessible and specialist housing?</p>	<p>Support, with comments</p> <p>The approach to the provision of accessible and specialist housing is supported. However, the policy should recognise that in identifying the need for accessible and specialist housing consideration will be given to the demographics of the area. For example, due to an assessment of the demographics within a certain area, specific demands for a type of accommodation, such as bungalows, may be identified and included within a planning application.</p>
<p><u>32</u></p> <p>Do you support, object or have any comments relating to the approach to Self / Custom Build?</p>	<p>Comments</p> <p>The objective of providing self and custom build is generally supported. However, the proposed threshold (5% of plots on residential proposals of 40 dwellings or more) is questioned, given that it would result in the delivery of substantially more self build and custom build units than for which there is an identified need. For example on large strategic sites, such as that covered by Policy GNL0337, this would result in provision of approximately 70 self and custom build units.</p> <p>The majority of sites that are identified to meet the housing growth targets are likely to be in excess of 40 dwellings. If, as a very broad calculation, the threshold is applied to only the new allocations identified in the</p>

<u>QUESTION</u>	<u>RESPONSE</u>
	<p>draft GNLP (7,840 homes), this would result in the provision of approximately 392 units self and custom build units. This is substantially more than the 113 people on the self and custom build register in the Greater Norwich Area (2018/19). The figure would substantially increase were the threshold applied to existing commitments which are yet to granted planning permission.</p> <p>Therefore, the inclusion within the policy that the requirement for self and custom build units will be subject to evidence of need is supported. The policy should, in accordance with the PPG, recognises that as well as the self build / custom build register, additional data from secondary sources should be considered to better understand the demand for self and custom build plots.</p>
<p><u>40</u></p> <p>Do you support, object or have any comments on the approach for elsewhere in the urban area including the fringe parishes.</p>	<p>Strongly support.</p> <p>As detailed in comments provided in respect of Question 13, the proposed Settlement Hierarchy and the identification of Norwich and the Norwich Fringe as the location to accommodate 69% of the housing growth during the period to 2038 is strongly supported.</p> <p>Norwich and the Norwich Fringe is the catalyst for economic growth in the area and provides a range of amenities, services and infrastructure to support sustainable housing.</p> <p>The fringe parishes will play a significant role in providing sustainable growth, given their proximity to employment opportunities, services and strategic infrastructure, such as Broadland Northway. In addition, by virtue of its location, the fringe parishes are in close proximity of the countryside providing ease of access to the leisure and recreation opportunities it provides.</p> <p>The fringe parishes provide opportunities for strategic growth i.e. over 1,000 units. Developments of this scale are capable of providing a wide range of infrastructure improvements, such as schools, employment, health centres and green infrastructure, which will provide benefits to both existing and future residents.</p>

<u>QUESTION</u>	<u>RESPONSE</u>
	<p>This approach is entirely consistent with paragraph 72 of the NPPF, which advises that “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided that are well located and designed and supported by the necessary infrastructure and facilities.”</p> <p>The identification of Taverham as a location to accommodate a minimum of 1,400 dwellings by way of a strategic urban extension is fully supported.</p> <p>Taverham provides an excellent location to provide a strategic urban extension of a minimum of 1,400 units. It represents a highly sustainable location with good access to Norwich, that has been significantly enhanced by the recent delivery of the Broadland Northway. The buffer created by the Broadland Northway presents an opportunity for a logical strategic urban extension to the settlement of Taverham at a size and scale that can, whilst being proportionate to the scale of the settlement, accommodate a significant quantum of the infrastructure and housing required in the Greater Norwich Area over the next two decades.</p> <p>Taverham already benefits from a variety of amenities including a pub, a supermarket, takeaways, petrol filling station and a garden centre. In addition, the area is within close proximity of the amenities provided within Thorpe Marriott and Drayton. Nightingale and Ghost Hill Infant schools are located in close proximity of the site, as are Taverham Junior and High Schools. A private school (Langley Preparatory School at Taverham Hall) is located nearby. These will be sustained and enhanced by the increased population proposed.</p> <p>The proposals to enhance the green infrastructure with the fringe parishes network through, amongst other things, improved links to Marriott’s Way is supported.</p>
<p><u>48</u></p> <p>Do you support, object or wish to comment on any other aspect of the draft plan not covered in other questions?</p>	<p>The following comments relate to the Greater Norwich Local Plan, Interim Viability Study, prepared by NPS Group (November, 19).</p> <p>Whilst there is general support for the approach adopted and the collaborative approach that the GNL033 Team are seeking to adopt, there is concern that the assumptions made within the Viability Study in relation to,</p>

<u>QUESTION</u>	<u>RESPONSE</u>
	<p>amongst other things, sales values, build costs and benchmark land values are too generic and not backed up by comparable evidence. Further evidence on this is provided below.</p> <p>In addition, there is concern that the typologies used within the Viability Study are both too general and do not reflect the allocations within the draft GNL0. For example, the largest size development appraised within the Viability Study is 600 units, notwithstanding the fact that a number of the carried forward allocations / preferred sites are well in excess of this figure. These larger sites are likely to require the more significant infrastructure obligations i.e. primary schools and health centres, so an assessment of viability and the implications for deliverability is key. To ensure a more robust and realistic approach we would suggest that site specific viability studies are undertaken of a selection of the preferred sites of varying sizes.</p> <p>As part of this work, consideration should be given to whether it is viable for some of the larger strategic sites, which have high infrastructure costs associated with their delivery i.e. the requirement to provide schools and health centres on land which otherwise would be land developable for alternative uses, to pay the Community Infrastructure Levy, in addition to the policy requirements of the Local Plan.</p> <p>The potential for infrastructure costs which are specific to larger strategic sites to be secured by appropriate and negotiable Section 106 planning obligations, in order to ensure that such sites are deliverable and, importantly, that there is certainty regarding the timely delivery of the infrastructure on site, should be fully explored. This approach, which has been adopted by Mid Suffolk District Council, is entirely consistent with the Community Infrastructure Regulations (2019).</p> <p>In addition to the foregoing, the following comments are made on the Interim Viability Study, with specific regard to Policy GNL0 0337, Land between Fir Covert Road and Reepham Road, Taverham and Typology 9.</p> <ul style="list-style-type: none"> • The assumed land values are too low and not representative of market values. Comparable evidence needs to be provided to justify the figures used. • The assumption that 54% of dwellings are 3 bedroom is considered high. It is considered based on evidence of local need that the housing mix should be more focused towards smaller dwellings to reflect market requirements.

<u>QUESTION</u>	<u>RESPONSE</u>
	<ul style="list-style-type: none"> • There should be more consideration of demographics. In our view, the identified housing mix should include a significant number of bungalows as the greatest rise within the age groups occurs in the 65 plus band. This will influence build cost, densities and sales values and is fundamental on any strategic site. • It would appear an error has been made within Table 4 in relation to density. A target of 25 dph nett would be achievable but not gross as stated. The density should be lower than typology 8 to reflect the infrastructure required on a strategic scheme. • In relation to infrastructure for strategic sites we would consider 30% to be the minimum allowance, not 20% as shown • Garages should be added into the build cost calculation. • No allowance has been made for Abnormals i.e. ground contamination, requirement for foul water pumping stations. This should be included or, alternatively, the contingency should be increased accordingly. • In relation to Affordable Housing, the return is likely to be between 45% / 50% (affordable rent) and 65% / 70% (shared ownership) of open market value. • In terms of Facilities, no allowance is made for education, community, health, commercial or retail, which are likely to be required for strategic sites. This allowance should include any requirement for maintenance contributions. • No allowance is made for planning or promotion costs. • No allowance is made for Third Party Agreements, which are potentially required on a range of sites, but highly likely on the large strategic sites. • An allowance should be made for Services. These are becoming increasingly expensive particularly given the increased requirements anticipated through the Future Homes Standards Consultation. • No allowance is made for phasing. It is likely that the large strategic sites will be delivered in phases. The viability should be amended to reflect this and the finance costs revised to reflect the need for the early delivery of infrastructure. • There is a concern that the £5,000 allowance for energy efficiency measures is too low.

PART 2

3.0 Responses to Draft Greater Norwich Local Plan - Sites Plan

- 3.1 On behalf of M Scott Properties Ltd (Scott Properties), we strongly support the preferred allocation of GNLP0337 (the Site), Land between Fir Covert Road & Reepham Road, Taverham. The Site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2038.
- 3.2 GNLP0337, which covers an area of approximately 78ha., has been identified in the draft GNLP as a preferred allocation for at least 1,400 homes, together with associated public open space, primary school and local medical centre.
- 3.3 In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the proposed allocation represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable. This is considered in further detail below by way of an Assessment of Delivery. The Assessment has been informed by a substantial amount of technical work, as well as discussions with a variety of key stakeholders, including Broadland District Council, Norfolk County Council (Highways and Education) and Taverham Parish Council. The work undertaken to date is covered in more detail in the Breck Farm Delivery Statement prepared by Scott Properties and submitted in support of this representation (See Appendix 1)

Assessment of Delivery

Suitable

- 3.4 Taverham is identified in both the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) (2011) and the draft GNLP, as being part of the Norwich Fringe. Norwich and the Norwich Fringe are identified as the location to accommodate 69% of the housing growth during the period to 2038 on the basis that is the most sustainable location with the Greater Norwich area and is the focus for significant economic growth. Norwich is the catalyst for economic growth in the area and provides a range of amenities, services and infrastructure to support sustainable housing.
- 3.5 Within the Norwich Fringe, Taverham represents a highly sustainable location with good access to Norwich, that has been significantly enhanced by the recent delivery of the Broadland Northway. The buffer created by the Broadland Northway presents an opportunity for a logical strategic urban extension to the settlement of Taverham at a size and scale that can, whilst being proportionate to the scale of the settlement, accommodate a significant quantum of the infrastructure and housing required in the Greater Norwich Area over the next two decades.
- 3.6 Accordingly, Taverham provides a wholly suitable location for strategic growth i.e. over 1,000 units, which can provide a wide range of infrastructure improvements, such as schools, employment, health centres and green infrastructure, which will provide benefits to both existing and future residents.
- 3.7 In addition, Taverham already benefits from a variety of amenities including a pub, a supermarket, takeaways, petrol filling station and a garden centre. In addition, the area is within close proximity of the amenities provided within Thorpe Marriott and Drayton. Nightingale and Ghost Hill Infant schools are located in close proximity of the site, as are Taverham Junior and High Schools. A private school (Langley Preparatory School at Taverham Hall) is located nearby.

- 3.8 Turning to the site, it is not subject to any landscape, nature or heritage designations, and will have minimal impact on the natural, built or historic environment. It is located immediately adjacent to the settlement boundary, and represents a logical extension to the settlement, occupying the space between the edge of the modern development along Kingswood Avenue and the newly constructed Broadland Northway, which provides a natural boundary to the north. There are no known designated or un-designated heritage assets in the vicinity of the site; the closest Listed Buildings are some 1.5km away from the site.
- 3.9 The site is well contained within the landscape, and will have minimal visual impact. The bunding along the southern side of the Broadland Northway will minimise views from the north, and the existing development along Fir Covert Road will perform the same function from the west. The existing tree belt which runs along the southern boundary will screen the development to a significant degree from the south, and the existing tree belt which runs north-south will screen some views from the east.
- 3.10 Development in this location, which is not particularly sensitive in terms of the natural, built and historic environment, will assist in protecting other, more sensitive locations, from development pressure.
- 3.11 Accordingly, it is evident that the identification of Taverham, and specifically land to covered by Policy GNL0337, as a location to accommodate a minimum of 1,400 units, is fully justified.
- 3.12 The following commentary demonstrates the suitability of the site having regard to technical matters, whilst responding to the points raised in draft Policy GNL0337's wording.

Density and Quantum of Development

- 3.13 The preferred allocation identifies the site as being suitable to accommodate approximately 1,400 homes, together with associated public open space, new primary school and local medical centre.
- 3.14 Based on the minimum target of 1,400 dwellings and the preferred allocation site area of approximately 78ha, the density of the development equates to approximately 18 dwellings per gross hectare. As detailed on the indicative masterplan submitted in support of this representation, the site has the potential to provide a mix of densities, ranging from 22 to 35 dwellings per net hectare, thereby achieving the minimum of 25 dwellings per net hectare sought by the draft GNL0337. On this basis, it is evident that whilst the site can accommodate the minimum number of units identified by the proposed allocation, it has the potential to accommodate more units if required. This will be explored as the detailed design of the proposed development progresses and discussions are held with key stakeholders.

Layout (Masterplan)

- 3.15 An Illustrative Masterplan has been prepared for the site by Brown & Co and is submitted as part of this representation. (See Appendix 2)

- 3.16 The Illustrative Masterplan demonstrates how the specific requirements of draft Policy GNL0337 can be accommodated on the site. More specifically, the Illustrative Masterplan outlines how the following uses are provided on site:
- Land for a primary school (2ha); the area of land required for the primary school has been agreed in discussions with Norfolk County Council Education.
 - Land for a medical centre (2.1ha); the medical centre will be included in what on the Illustrative Masterplan are labelled as mixed-use parcels of land. As well as a medical centre, the parcel could include retail and community uses to ensure the creation of a mixed and sustainable development. The mixed-use parcels of land are shown as being located toward the centre of the site in accordance with the requirements of Policy GNL0337.
 - Open space; in accordance with Broadland District Council's Supplementary Planning Document on Recreational Provision in Residential Development, the initial Illustrative Masterplan will develop through consultation workshops with Officers, Parish Council and other stakeholders, which will inform the design to create a policy compliant masterplan. The open space provided on site will be determined as the detailed design progresses and in consultation with the local community and will include a mix of child play spaces, sports pitches, informal open space and allotments. The latter being a specific request of Taverham Parish Council. The Illustrative Masterplan details how, in accordance with the requirements of Policy GNL0337, open space can be provided on site to encourage healthy lifestyles. A key element of this is the creation of a link between the site and Marriott's Way.
- 3.17 The Illustrative Masterplan does not, however, provide land for commercial floorspace. This is on the basis that following discussions with both Taverham Parish Council and local agents, the site is not considered to represent a suitable location for 'stand-alone' commercial units. However, as detailed above, the mixed-use parcels of land located toward the centre of the site will have the potential to provide a variety of uses, such as retail and care, which are capable of meeting a local need that may be generated by the development, whilst generating employment opportunities.
- 3.18 On this basis, it is evident that the site is suitable in terms of meeting the various requirements of the draft Site allocation in relation to use.

Access, Transport and Roads

- 3.19 Scott Properties has been working in conjunction with Norfolk County Council Highways to ensure the local road infrastructure has the capacity to manage the increase in demand and that suitable access points can be provided.
- 3.20 As a result of this work, and in accordance with the requirements of the draft Policy, potential arrangements for access from both Reepham Road and Fir Covert Road have been identified in consultation with Norfolk County Council Highways. A link road will connect the new junction on both Fir Covert Road and Reepham Road. Further details on proposed access points is contained within the Delivery Statement submitted as part of this representation. The exact details will be agreed with Norfolk County Council Highways as the detailed design progresses and, for example, may include a 't-junction' with Reepham Road.
- 3.21 The Illustrative Masterplan also details how enhanced pedestrian and cycle links to the existing communities of Felsham Way, Ganners Hill, Breck Farm Lane and Kingswood Avenue can be facilitated by the development. In addition, connections can be made with Marriott's Way which in

turn provides ease of access to the wider national cycle network. This will be facilitated by a crossing which replicates that on Pendlesham Rise to ensure there is minimal impact on the route.

- 3.22 Accordingly, as the illustrative masterplan demonstrates, the requirements of draft Policy GNLP0337 can be accommodated within the site.

Landscaping

- 3.23 The Site is, as detailed on the illustrative masterplan, capable of providing a comprehensive landscape strategy, which will create opportunities for ecological and biodiversity enhancements. This will include:

- Enhancements to the landscape buffer adjacent to the A1270 (Broadland Northway) in order to ensure residential amenity is protected;
- A central green 'park walkway' formed of the existing mature and defined Marriott's Way,
- A substantial green edge around the Site peripheries, created using woodland and meadow environments;
- Retention of existing trees and hedgerows where possible, with suitable mitigation if removal is required.

- 3.24 Accordingly, as the illustrative masterplan demonstrates, the requirements of draft Policy GNLP0337 can be met on the site.

Other Matters

- 3.25 As detailed above, a substantial amount of technical work has been undertaken to inform the promotion of the site and the preparation of the illustrative masterplan. The technical work includes:

- Phase 1 & 2 Site Investigation Reports by Geosphere Environmental Ltd
- Surface Water Drainage Strategy prepared by Cannon Consulting Engineers
- Aboricultural Survey prepared by Geosphere Environmental Ltd
- Preliminary Ecology Appraisal prepared by Geosphere Environmental Ltd
- Great Crested Newt Survey prepared by Geosphere Environmental Ltd
- Ecology Survey prepared by Geosphere Environmental Ltd
- Bat Foraging Survey prepared by Geosphere Environmental Ltd
- Winter & Breeding Survey prepared by Geosphere Environmental Ltd
- Heritage Statement prepared by Archaeological Solutions Ltd
- Archaeological Statement prepared by Archaeological Solutions Ltd
- Habitat Regulations Assessment prepared by Geosphere Environmental Ltd
- Preliminary Air Quality Appraisal prepared by Mayor Brown Ltd
- Preliminary Acoustic Appraisal prepared by Mayor Brown Ltd

- 3.26 A summary of the findings of these reports is contained within the Delivery Statement submitted alongside this representation. However, of particular note, given the specific reference in draft Policy GNL0337 is:
- Ecology; it is evident from the various surveys undertaken that there are no protected species on site. However, the work has, in accordance with the requirements of the draft policy, identified a number of measures to enhance ecological networks and habitats i.e. areas of green infrastructure to be planted with scattered scrub and residential planting to include native species. The principles of these mitigation measures are included within the illustrative masterplan and will be developed further as the detailed design progresses.
 - Flooding; the majority of the site is within Flood Zone 1 and is not identified as being at risk of flooding. The site investigations have informed the preparation of a drainage strategy to ensure that surface water flooding is addressed on site in accordance with national and local policy. The drainage strategy will include a combination of soakaways and attenuation basins, as well as private soakaways.
- 3.27 It is, based on the foregoing, together with the technical information submitted in support of this representation, evident that the site is capable of meeting the requirements of draft Policy GNL0337. However, for reasons detailed above, it is recommended that a number of minor amendments are made to the draft policy.

Revised Policy Wording

- 3.28 *POLICY GNL0337 Land between Fir Covert Road and Reepham Road, Taverham (78.36 ha) is allocated for residential development. The site is likely to accommodate at least 1,400 homes, 33% of which will be affordable, associated public open space, new primary school and local medical centre.*

More homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints.

The development will be expected to address the following specific matters:

- *Provision of on-site recreation to encourage healthy lifestyles, in accordance with relevant policies.*
- *Land safeguarded for provision of primary school.*
- *Land safeguarded for provision of medical care facility.*
- ~~*Provision of commercial space adjacent to the Broadland Northway (A1270).*~~
- *Provision of retail / commercial space as part of a Local Centre.*
- *Preparation of a masterplan to guide the development, submitted as part of the application for planning permission.*

The masterplan should demonstrate:

- *Detailed arrangement for access (vehicular and pedestrian) such as from Reepham Road and Fir Covert Road, pedestrian/cycle links at Felsham Way, Ganners Hill, Breck Farm Lane, and Kingswood Avenue.*
- *Set out the distribution of land-uses across the site. The School and medical care facility should be centrally located in an easily accessible location on the site.*

- Off-site improvements to the highway network which may include provision of new junction roundabout on Reepham Road, and Fir Covert Road ~~connected by a including proposed link road~~.
- No adverse effect on the operation of the water treatment works.
- Safeguarding and landscape enhancement of the Marriott's Way.
- Set out the approach to phasing of development across the site.
- Provision of ~~significant~~ **suitable** landscape buffer adjacent to A1270 and adequate noise mitigation measures to protect residential amenity.
- Inclusion of pollution control techniques to ensure that development does not lead to pollution of the water environment as the site falls within source protection zone 3.
- Submission of an Arboricultural Impact Assessment (AIA) to protect or to mitigate any harm to trees on site.
- Submission of ecological assessment to identify key ecological networks and habitats to be preserved and enhanced through the development.
- Mitigation of surface water flooding onsite.
- Compliance with the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the mineral planning authority as

Strikethrough = delete text

Red = revised text

- 3.29 In addition, minor alterations are proposed to the site's red line boundary. These changes, which relate to land within the control of Scott Properties, are required to ensure access to Fir Covert Road is included within the allocation. A revised red line is attached as Appendix 3.

Availability & Achievable (Proposed Housing Trajectory)

- 3.30 The site is controlled, in its entirety, by Scott Properties. More specifically, Scott Properties are promoting the land on behalf of two landowners, with the entire area that is subject to Policy GNLP0337 being under either promotion or option agreements.
- 3.31 Scott Properties are keen to commence delivery on site at the earliest available opportunity. The intention is to submit a detailed planning application for the first phase of development (100 bungalows developed by Scott Residential and 100 family homes developed by Abel Homes, together with a 90 bed care facility provided by Saffron Housing) in 2021, with an outline or hybrid application for later phases being submitted in late 2021 / early 2022. Discussions with Broadland District Council and other key stakeholders have been ongoing for a number of months. Formal pre-application discussions are due to commence in April 2020 with Broadland District Council.
- 3.32 In terms of the partners involved within the first phase of development, Scott Properties will work together with the developers to provide high quality products through the phases of the development, ensuring infrastructure is delivered in a suitable timescale.

- 3.33 Scott Residential are a family owned business, specialising in delivering high quality homes specifically designed to keep people living independently for longer, and will deliver the first phase of bungalows. The unique design enables them to adapt to changing needs as they arise, supporting lifestyle changes as people age, whilst enabling residents to stay close to family and friends. Gainsford Gardens at Clacton-on-Sea, is a residential development of 65 bungalows, along with new sports facilities for the local community. The initial phase at Avocet Place, Thorrington, is in the final stages of construction, and is expected to be complete by April 2020, with a subsequent under construction. Additional development sites in Essex and Suffolk are currently in the planning process, which will provide further opportunities for Scott Residential, with a target delivery rate of 100 bungalows per annum.
- 3.34 Abel Homes, who will deliver the first phase of family housing, are a family owned business based in Watton, who are committed to providing contemporary, energy efficient, award winning homes across the region. Abel Homes have demonstrated this dedication, and their commitment to bringing new homes to the region, through a range of developments across Norfolk, such as the Hops in Hingham (88 dwellings), Swan's Nest, Swaffham (425 dwellings), The Limes, Little Melton (28 dwellings), Watton Green (98 dwellings) and Mattishall (35 dwellings). Abel Homes are recipients of NHBC Pride in the Job Awards for the past two years and previous recipients of the Broadland District Council Design award for their Hus22 scheme in Drayton.
- 3.35 Saffron Housing, in conjunction with Norfolk County Council, Norse and Homes England will construct and manage a 90-bed assisted living facility, providing suitable accommodation and necessary support to those with specific requirements.

	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038
Submission of application	Q2																	
Determination of application	Q4																	
Commencement of works		Q2																
Occupation of first dwellings			Q3															
Dwellings sold			20	155	175	130	130	130	120	120	90	100	90	90	50	0	0	0
Cumulative dwellings sold	0	0	20	175	350	480	610	740	860	980	1070	1170	1260	1350	1400	1400	1400	1400
Completion																Q1		

- 3.36 Based on current market conditions it is envisaged that the development of the site will be completed within the plan period. The table below shows that anticipated delivery rate of the site:

Viable

- 3.37 We are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site. This statement is, however, made in the context of the questions that have been raised in relation to Greater Norwich Local Plan Interim Viability Study (2019) (Question 48) and the imminent review of the Community Infrastructure Levy. Further discussions are required with the GNLP Team on these matters in order to confirm that the various policy objectives, such as affordable housing and community / social infrastructure, can be delivered on site without prejudicing the viability of the site. Scott Properties are keen to continue discussions with the GNLP Team on this matter asap.

Summary

- 3.38 As outlined above, the site is suitable, available and viable, and is therefore developable. Housing in this location, together with associated community facilities, would represent sustainable development, as defined within the National Planning Policy Framework. Taverham, as part of the Norwich Fringe, is a highly sustainable location, and a preferred location for growth, and the foregoing text demonstrates that this specific site is a suitable location for development in all respects.
- 3.39 Economically, the site represents the right land in the right place at the right time. Residential development here in the plan period would support employment growth within Norwich, providing high quality and desirable homes within easy reach of key employment locations. In addition, it would generate employment opportunities through the range of uses provided within the development, including the school, care facility and local centre.
- 3.40 Socially, the scale of development envisaged is such that it will enable the creation of a strong, vibrant and healthy community, with easy access to existing and planned local services and facilities, as well as on-site provision of a primary school and health facility and extensive Green Infrastructure. A wide mix of dwelling types, sizes and tenures will be provided to meet local needs. Furthermore, the site is located in close proximity to established communities in Taverham, which should assist in achieving social integration between the existing and new residents.
- 3.41 Environmentally, the site is located close to a wide range of employment opportunities and enjoys good access to a range of sustainable transport options providing easy access to the extensive array of facilities and services available within Norwich and further afield. Residents will be able to meet their day-to-day needs easily and without the need to use their car, assisting in reducing pollution and minimising the contribution to climate change. The site is well contained within the landscape, and will have minimal visual impact. In addition, development in this location, which is not particularly sensitive in terms of the natural, built and historic environment, will assist in protecting other, more sensitive locations, from development pressure.
- 3.42 We, therefore, strongly support the identification of the Site under policy GNLP0337 to provide at least 1,400 units and make a significant contribution towards satisfying the Councils' housing needs during the period to 2038. The foregoing text and associated documents demonstrate how the requirements of policy GNLP0337 can be satisfied.

APPENDIX 1

DELIVERY STATEMENT PREPARED BY SCOTT PROPERTIES

APPENDIX 2

ILLUSTRATIVE MASTERPLAN PREPARED BY BROWN & CO

APPENDIX 3

REVISED RED LINE PLAN



BIDWELLS

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