

## **GNLP - REGULATION 19 CONSULTATION RESPONSE: POLICY GNLP0311, GNLP0595 AND GNLP2060 - LAND SOUTH OF BURGH ROAD AND WEST OF A140, AYLSHAM**

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**Question 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

On behalf of Hopkins Homes, we continue to strongly support the proposed allocation of GNLP0311, GNLP0595 and GNLP2060, Land South of Burgh Road and West of A140, Aylsham. The following Representation considers GNLP0311, GNLP0595 and GNLP2060 as one site. The site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the plan period to 2038.

For clarity, the previous representations made to the Regulation 18(C) 'Preferred Allocation' consultation in March 2020, and Regulation 18 consultation are also provided, as Appendix 1.

GNLP0311, GNLP0595 and GNLP2060 have been identified as a proposed allocation for approximately 250 homes, across a site area of approximately 12.86 ha. and new primary school. The preferred allocation outlines that the development will be expected to address 8 specific matters. An updated Concept Masterplan, prepared by CSA Environmental, is provided in support of this representation (as Appendix 2), to demonstrate how the site can be developed, in the context of the site policies specific matters

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.

However, whilst the principle of the policy is considered sound, in accordance with the tests set out in paragraph 35 of the NPPF, minor alterations are proposed to the detailed wording of the policy to ensure it is justified and, therefore, sound.

### **Confirmation of Delivery**

#### ***Suitable***

It has been demonstrated that the site is an entirely suitable location for further development through the information provided as part of the Regulation 18(C) consultation. This technical work included a Transport Note, and Flood Risk Screening and Scoping Report, together with Concept Masterplan.

The site has also been subject to on-going pre-application engagement with Broadland District Council, who have similarly engaged with Norfolk County Council Highways and Norfolk County Council Education, amongst others. Via this engagement Broadland District Council have confirmed in principle support for the quantum of residential development and associated density, the 2 ha. of land for the School upon the site, and the provision of two access points onto Burgh Road, amongst other matters.

Aylsham is identified within Policy 1's (The Sustainable Growth Strategy) 'Settlement Hierarchy' as a Main Town, that rightly constitutes a higher order settlement, as it provides good access to services, employment and infrastructure.

In accordance with the settlement hierarchy, the Main Towns collectively provide just over 6,800 homes, around 14% of the proposed housing growth planned to 2038. Aylsham, as a Main Town, provides a vital role in the rural economy, providing employment opportunities and services for wider hinterlands. As such Aylsham is an engine of rural growth.

Aylsham benefits from a good range of shops and services, including a primary school, high school, a range of supermarkets (including Tesco, Budgens and Marks & Spencer), petrol station, doctor's surgery, dentists, and a range of employment opportunities. Transport links to and from the town via the A140 are good, including regular bus services to Norwich and North Norfolk. Commensurate with its sustainable nature, new allocations totalling 550 dwellings are proposed for Aylsham.

The suitability of Aylsham for growth, and in particular, the eastern part of the Town, has been demonstrated through the development of Bure Meadows (by David Wilson Homes). Bure Meadows was allocated under AYL2 of the Broadland Site Allocations DPD (2016) for 300 dwellings. As a result, the site constitutes a logical and suitable location for development, being adjacent to the south of Bure Meadows, which ensures that the site provides a logical extension to the Settlement Boundary. On the above basis, the proposed growth of Aylsham by at least 550 new homes, and the allocation of the host land for approximately 250 homes, is 'sound' given that it is positively prepared, justified, effective and consistent with national planning policy.

The following commentary continues to demonstrate the suitability of the site having regard to technical matters, whilst responding to a number of the points raised in the proposed allocation's wording.

### ***Density and Quantum of Development***

The proposed allocation identifies the site as being suitable to accommodate approximately 250 homes and a primary school. The overall site area totals 12.86 ha. As part of the overall site, land totalling 2 ha is provided for a primary school (See Concept Masterplan prepared by CSA Environmental and submitted in support of this representation).

Consequently, the developable residential area totals 10.86 ha. Based on 250 dwellings across the residential area of 10.86 ha, the density of the proposed development equates to 23 dwellings per hectare. Whilst this density is marginally below the indicative minimum density set out in Policy 2 (Sustainable Communities) of the GNLP Pre-Submission Draft Strategy, which seeks a minimum of 25 dwellings per hectare, Policy 2 is clear that that this is an indicative minimum net density, whilst the specific Policy GNLP0311, 0595 and 2060 clearly specifies that the site is to accommodate approximately 250 homes. As such the absolute dwellings that the site provides could increase, and as a result the net density of residential development. Accordingly, the quantum of 250 dwellings or a variance on this number to be determined through the planning application preparation process will ensure the efficient use of land in the spirit of Policy 2.

Furthermore, Policy 7.2 (The Main Towns) rightly acknowledges that Main Towns are a highly sustainable location for growth, Aylsham is the only Main Town in Broadland. Consequently, providing additional growth on the site will help to enhance the role of the Main Town, ensuring that growth is directed to a sustainable location.

### ***Layout and Design***

As detailed above, an updated Concept Masterplan has been prepared by CSA Environmental, and is submitted in support of this Representation. The Concept Masterplan, with its associated annotation, clearly demonstrates how the site can comfortably accommodate the various specific matters / requirements of the preferred allocation, including approximately 250 dwellings, alongside land for a primary school. The Concept Masterplan demonstrates how the site could feasibly be laid out with residential development proposed predominately in the western half of the site, with land for a primary school in the eastern half of the site.

Notwithstanding the Concept Masterplan, at this stage the exact location of the school is currently subject to discussions with Norfolk County Council (Education and Highways) and its precise location within the site will be confirmed in due course.

It is also noted that whilst specific matter 4 of the policy clearly states that the site will provide '2 ha. of land at nil value for a primary school on site' the heading to the policy reads 'the site is to accommodate approximately 250 homes, and new primary school'. To ensure that the policy is unambiguous and moreover sound, the main text should also make clear that 2 ha. of land is required for a primary school on site.

In accordance with specific matter 1 of the Site Allocation, two access points to the site are proposed from Burgh Road, and are situated to the north and north-eastern boundaries of the site.

The location of the two points of vehicular access to the site has informed the layout of the remainder of the site, informing the indicative internal road layout, alongside the location of public open spaces within the site, and internal pedestrian footpaths throughout the site. In addition, the Concept Masterplan outlines how a range of pedestrian footpaths could be provided, linking with the Bure Valley Path, based around strategic areas of landscaping.

In addition, the Concept Masterplan details how a framework of informal and formal public open space can be provided throughout the site, according with the current emerging standards for public open space provision.

Overall, the updated Concept Masterplan demonstrates how a high-quality layout and design can be comfortably achieved, based on the site area and the provision of approximately 250 dwellings and land for a primary school, whilst considering the specific 8 specific policy requirements of the proposed allocation.

### **Access, Transport and Roads**

In conjunction with the previous Regulation 18(C) consultation representation a Transport Note was prepared by Rossi Long Consulting that demonstrated that all of the highways and accessibility requirements could be achieved as part of development on the site. This is provided at Appendix 1.

Amongst other matters, the Note confirmed that, in accordance with the requirements of the draft policy, two vehicular access points could be satisfactorily provided onto Burgh Road, and that carriageway widening to 5.5m over the full frontage and a 2.0m footway should also be provided to connect with the existing facility to west.

Specific matter 2 of the proposed policy now requires that '*carriageway widening is required to achieve a minimum width of 6.0m over the full frontage and a 2.0m footway*'.

Whilst an additional 0.5m carriageway increase could be accommodated, in the absence of any known policy changes there would appear to be no apparent justification for this increase, and it would therefore not appear necessary to make the site (or any subsequent planning application) acceptable to ensure its delivery, mindful of the Regulation 18(C) policy requirement.

In this context, specific matter 2 is not considered sound, as it is not justified.

The other transport related requirements detailed in the proposed allocation, to include pedestrian crossings, can be provided as part of the proposed development, as indicated on the Concept Masterplan that supplements this representation.

### **Available**

Whilst the three sites that make up the allocation are within separate ownership all three landowners are supportive of the preferred allocation and are committed to continue to work together and with Hopkins Homes to deliver the site in accordance with the policy set out in the proposed Local Plan. Confirmation of the signing of the Option Agreement will be provided to the GNLP Team in due course.

### **Achievable**

Based on the evidence submitted in conjunction with the various iterations of the site policy, and moreover the proposed policy, there are no site-specific constraints which could preclude the delivery of residential development on the site. Through the provision of a range of developments throughout the region, including in Aylsham, Hopkins Homes have demonstrated that they are committed and able to achieve the delivery of housing of large scale developments. Therefore, residential development on the site is deemed to be entirely achievable.

### **Statement of Common Ground**

A Statement of Common Ground (SoCG) has been prepared by Hopkins Homes. The SoCG confirms that the site is, in principle, compliant with all relevant planning considerations and deliverable. In respect of the latter, the SoCG confirms that the site is available, suitable and therefore deliverable.

A copy of the SoCG is attached as Appendix 3.

### **Summary**

Aylsham is a highly sustainable location for growth, benefitting from a range of services and amenities, including a primary school, high school, a range of supermarkets (including Tesco, Budgens and Marks & Spencer), petrol station, doctor's surgery, dentists, alongside a range of shops, services and employment opportunities.

As has been demonstrated, the site is suitable, available, achievable and viable, and is deliverable within the early periods of the plan period. As previously recognised, there are no constraints which would affect the suitability of the site for residential development. The preceding text and accompanying masterplan demonstrates that this site is a suitable location for development and is capable of meeting the requirements of Proposed Policy GNLP0311, GNLP0595 and GNLP2060. Accordingly, Hopkins Homes fully supports, in principle, the allocation of the site under Policy GNLP0311, GNLP0595 and GNLP2060 for residential development and land for a primary school. However, as detailed above, to ensure Policy GNLP0311, GNLP0595 and GNLP 2060 is sound minor alterations are suggested to the wording of the policy.

**Question 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible**

As fully outlined in the response to question 5 above, whilst the principle of the policy is considered sound, in order to ensure that Policy GNLP0311, GNLP0595, and GNLP2060 is sound, three minor modifications are required, as detailed below.

### **Revised Policy Wording**

#### **Policy GNLP0311, 0595 and 2060**

**Land south of Burgh Road and west of the A140, Aylsham (approx. 12.86 ha) is allocated for residential development. The site is to accommodate approximately 250 homes, and land for a new primary school.**

1. The development will be expected to address the following specific matters:
2. Access should be via Burgh Road with two access points for vehicles.
3. Carriageway widening is required to achieve a minimum width of ~~6.0m~~ **5.5m** over the full frontage and a 2.0m footway should also be provided to connect with the existing facility to west.
4. Requires pedestrian crossings at Burgh Road to bus stop and on route to High School and connections to Station Road, Ripplingall Road, Bure Valley Walk, along with suitable crossing of A140.
5. 2 ha of land ~~at nil value~~ to be provided for a new primary school on site.
6. Improved green infrastructure improvements alongside the Bure Valley Walk.
7. Layout and design to take account of noise from the adjacent A140, and landscaping to screen impact on the countryside setting to the south-east.

8. A drainage strategy, and completion of required mitigations, to ensure that development would not cause detriment to the capacity of the sewer system nor result in increased flood risk downstream.
9. Any development should conserve and where appropriate enhance the significance of the grade II listed Bure Valley Farmhouse, including any contribution made to that significance by setting. This includes but is not limited to appropriate landscaping, setback and open space and design.

**Key**

**Red Text – Proposed Amendments**

– Proposed Text to be Removed

## APPENDIX 1

# PREVIOUS REG 18(C) AND REG 18 CONSULTATION REPRESENTATIONS

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## **GNLP - REGULATION 18(C) CONSULTATION RESPONSE GNLP0311, GNLP0595 AND GNLP2060 - LAND SOUTH OF BURGH ROAD AND WEST OF A140, AYLSHAM**

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On behalf of Hopkins Homes, we strongly support the preferred allocation of GNLP0311, GNLP0595 and GNLP2060, Land South of Burgh Road and West of A140, Aylsham. The following Representation considers GNLP0311, GNLP0595 and GNLP2060 as one site. The site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2038.

GNLP0311, GNLP0595 and GNLP2060 have been identified as a preferred allocation for at least 300 homes, across a site area of 12.86 ha. The preferred allocation outlines that development should provide:

- 33% affordable housing provision;
- Land for a new primary school;
- Two points of vehicular access to the site;
- Carriageway realignment to Burgh Road to 5.5m; and
- Provision of a 2m footpath.

The Note relating to the draft policy confirms that the site benefits from good access to the A140 and good public transport provision. It also advises that Anglian Water have plans to increase capacity at the local water recycling centre (in order to accommodate the proposed growth afforded to Aylsham).

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.

### **Assessment of Delivery**

#### ***Suitable***

Aylsham is identified in the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) (2011) and the draft Greater Norwich Local Plan (GNLP) as a Main Town. The draft GNLP advises that Main Towns will be developed to enhance their functions as attractive places to live, alongside providing employment services to serve rural hinterlands. Consequently, substantial levels of development are expected to take place in Main Towns.

Aylsham benefits from a range of services and amenities to support day to day life, including a primary school, high school, a range of supermarkets (including Tesco, Budgens and Marks & Spencer), petrol station, doctor's surgery, dentists, and a range of employment opportunities. As a result, growth of at least 300 dwellings, across the site (GNLP0311, GNLP0595 and GNLP2060), is allocated to Aylsham in the draft GNLP. The site is the only location identified for growth in Aylsham.

The suitability of Aylsham for growth, and in particular, the eastern part of the Town, has been demonstrated through the development of Bure Meadows (by David Wilson Homes). Bure Meadows was allocated under AYL2 of the Broadland Site Allocations DPD (2016) for 300 dwellings. As a result, the site constitutes a logical and suitable location for development, being adjacent to the south of Bure Meadows, which ensures that the site provides a logical extension to the Settlement Boundary.

Given the suitability of Aylsham, the identification of the site as a preferred allocation will help to achieve the GNLP's aspirations of focusing growth in Main Towns, providing a valuable contribution to the 14% housing growth the draft GNLP directs to Main Towns (300 dwellings in Broadland).

The following commentary demonstrates the suitability of the site having regard to technical matters, whilst responding to the points raised in the preferred allocation's wording.

### ***Density and Quantum of Development***

The preferred allocation identifies the site as being suitable to accommodate at least 300 homes. However, the preferred allocation also suggests that more homes may be accommodated, subject to an acceptable design and layout, alongside any infrastructure issues being addressed.

The overall site area totals 12.86 ha. As part of the overall site, land totalling 2 ha is provided for a primary school. (See Concept Masterplan prepared by CSA Environmental and submitted in support of this representation). Consequently, the developable residential area totals 10.86 ha. Based on 300 dwellings across the residential area of 10.86 ha, the density of the proposed development equates to 28 dwellings per hectare. This figure is marginally above the indicative minimum density set out in Policy 2 of the draft GNLP, which seeks a minimum of 25 dwellings per hectare. Accordingly, the provision of 300 units will ensure the efficient use of land.

The proposed densities are lower than Bure Meadows, which averages 31 dwellings per hectare. Therefore, it is evident that the site can comfortably accommodate the minimum growth envisaged for the site and there is potential for in excess of 300 dwellings to be provided. This may be particularly beneficial if it becomes evident that other sites across the GNLP area are undeliverable. It is, for example, noted that there is doubt surrounding the deliverability of the Carrow Works site, which is a preferred allocation for 1,200 dwellings, in the draft GNLP.

In addition to this, whilst the draft GNLP recognises that Main Towns are a highly sustainable location for growth, Aylsham is the only Main Town in Broadland. Consequently, providing additional growth on the site will help to enhance the role of the Main Town, ensuring that growth is directed to a sustainable location.

### ***Layout and Design***

As detailed above, a Concept Masterplan has been prepared by CSA Environmental, and is submitted in support of this Representation. The Concept Masterplan demonstrates how the site can comfortably accommodate the requirements of the preferred allocation, including at least 300 dwellings, alongside land for a primary school. The Concept Masterplan demonstrates how the site is laid out with residential development proposed predominately in the eastern half of the site, with land for a primary school in the south-western corner of the site. The exact location of the school will be confirmed in discussion with Norfolk County Council (Education) in due course. Two access points to the site are proposed from Burgh Road, in accordance with the preferred allocation, and are situated to the north and north-eastern boundaries of the site. Further commentary on the access strategy is provided below.

The location of the two points of vehicular access to the site has informed the layout of the remainder of the site, informing the indicative internal road layout, alongside the location of public open spaces within the site, and internal pedestrian footpaths throughout the site. In addition, the Concept Masterplan outlines how a range of pedestrian footpaths could be provided, linking with the Bure Valley Path, based around strategic areas of landscaping.

In addition, the Concept Masterplan details how a framework of informal and formal public open space can be provided throughout the site, according with the current adopted standards for public open space provision.

Overall, the Concept Masterplan demonstrates how a high quality layout and design can be comfortably achieved, based on the site area and the provision of at least 300 dwellings and a primary school, whilst considering the specific policy requirements of the preferred allocation.



## *Access, Transport and Roads*

A Transport Note has been prepared by Rossi Long Consulting and is submitted in support of this Representation. The Note confirms that the site is located within easy walking and cycling distance of the town centre, schools, retail, leisure and employment opportunities, as well as being in close proximity to the A140.

The Note confirms that, in accordance with the requirements of the draft policy, the most suitable points of access to the site are from Burgh Road, ensuring that no direct access to the site is required from the A140. The location of the two access points allow the provision of adequate visibility splays, whilst avoiding conflict with the Buckenham Road junction and existing site accesses. Initial assessment work has confirmed that visibility splays of 2.4m x 59m are achievable on Burgh Road (according with the requirements for a 30mph speed limit), and would be of a Type 2/3 design. Junction capacity assessments for at least 300 dwellings have confirmed that two T-junctions are likely to be appropriate with regards to capacity. Accordingly, two points of vehicular access to the site can be achieved, in accordance with the preferred allocation.

It is also recognised within the Note that the road width along the site frontage could be increased to a maximum width of 5.5m. New footways of 2m width would be provided along the site frontage to the west, facilitating connection to the existing footpaths. Accordingly, the requirements of the draft policy can be satisfied.

Existing bus stops, on Burgh Road, are available adjacent to the site, providing suitable facilities for future residents. The Report also notes that, if required, two additional points of access could be utilised for either emergency vehicles or for pedestrians/cyclists, via Rippingall Road and Station Road. These points of access would provide routes to Aylsham town centre, the Railway Station and Tesco.

With regards to highway safety, the Note confirms that the absence of accidents recorded in the vicinity indicate that there are no inherent safety concerns to take into account taking access to the site from Burgh Road.

On the basis of the foregoing, the Note confirms that there are no reasonable safety, capacity, sustainability or access reasons as to why the proposed site should not be allocated for the proposed development. It has also been demonstrated that the four transport related requirements detailed in the preferred allocation, can be provided as part of the proposed development.

## ***Land for a Primary School***

The site includes 2 ha of land for a primary school, in the south-western corner of the site, which is in full accordance with the preferred allocation. Ongoing discussions with Norfolk County Council Education have confirmed that the provision of land for a primary school is necessary, and could incorporate provision for early years, if required. As detailed above, the exact location of the School will be confirmed in discussions with Norfolk County Council in due course.

## ***Flood Risk and Surface Water Drainage***

A Flood Risk Screening and Scoping Report has been prepared by Rossi Long Consulting and is submitted in support of this representation. The Report confirms that the site falls within Flood Zone 1, where there is a low probability of fluvial flooding on the site. In addition, the majority of the site is at 'very low' risk of surface water flooding, however, two routes of surface water flooding cross the site. The first enters the site from the western boundary and flows north-east, and is of 'high risk'. The second route flows from midway along the southern boundary, to the north of the site, at 'low risk'. On this basis, the Concept Masterplan has been designed in a manner to account for the route of potential surface water flooding, ensuring that these areas remain development free.

With regards to surface water drainage, British Geological Survey mapping indicates that site ground conditions may not be suitable for infiltration of surface water runoff. Site investigations and infiltration tests will be conducted in due course to confirm the position.

The Report also outlines that the development will need to accommodate the existing on-site public sewers, providing necessary easements for future maintenance (ranging between 3m and 6.5m either side of the centreline of the sewers).

As recognised on the Concept Masterplan, the sewers and associated easements have been considered in the preparation of the masterplan.

Therefore, the Report concludes that the site is at low risk of fluvial flooding, and the NPPF sequential and exception tests are not required.

**Previous Regulation 18 (a) Representation (2018)**

A Representation was submitted for the site at the Regulation 18 (a) stage, which demonstrated how all site-specific constraints rated amber in the Housing and Employment Land Availability Assessment (HELAA), could be overcome, helping to ensure the suitability of the site. The suitability of the site is recognised by the identification of the site as a new allocation.

Whilst, as detailed above, a lot of the technical information submitted at the Regulation 18 (a) stage has been updated, some of the information submitted as part of that Representation remains relevant. Although some of the technical information related to GNLP0311, which comprises, the majority of the site, has been superseded (by the submitted Transport Note, and Flood Risk Screening and Scoping Report) , the findings of the various reports are, in principle, considered relevant to the entire site.

For example, utilities records sought from all providers demonstrated that a full range of utilities are available in the locality (including electricity, gas, potable water and telecommunications). A Preliminary Ecological Appraisal was undertaken by CSA environmental, which confirmed that there are no overriding ecological constraints and, indeed, the development of the site would enable a range of ecological enhancement measures to be delivered which would be of benefit to local wildlife. An Archaeological Desk Based Assessment was prepared by CgMs, which confirms that there are no designated heritage assets within the site. A Desk Study Summary Investigation relating to ground conditions was prepared by Rossi Long Consulting, which advises that the site does not have any clearly identifiable significant former industrial use and there are no related key contaminants. For completeness, a copy of the Representation is submitted as Appendix A. Previous Representation GNLP0311, Land South of Burgh Road, Aylsham.

**Deliverability & Proposed Housing Trajectory**

Hopkins Homes are committed to providing new housing with character and individuality across the region. Hopkins Homes have demonstrated this dedication and their commitment to bringing new homes to the region, through a range of recent developments, such as Bure Place, Aylsham; Birch Gate, Wymondham; St George’s Place, Sprowston; and, Herons Gate, Blofield.

The following Housing Trajectory relating to the site has been informed by robust local evidence, including the completion of a range of developments across the GNLP area by Hopkins Homes, including within Aylsham.

Hopkins Homes are currently seeking to submit an application in 2022 to tie in with adoption of the Local Plan. Assuming a 6-9 month period for the determination of the planning application, alongside a further 6 months for construction to commence on site, housing could start to be delivered on site in 2024. It is estimated that, based on the completion rates of other developments by Hopkins Homes, that the scheme would deliver 50 units per annum, ensuring completion in 2029; well within the Local Plan period. If supported by the GNLP Team and Broadland District Council, Hopkins Homes would be willing to consider the submission of an early application.

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Units</b>	0	0	50	50	50	50	50	50	0	0	0	0	0	0	0
<b>Cumulative Total</b>	0	0	50	100	150	200	250	300	0	0	0	0	0	0	0

### **Available**

*The three sites that make up the allocation are within separate ownership. A Memorandum of Understanding regarding the promotion and development of the site by Hopkins Homes has been agreed by the landowners and an Option Agreement is due to be agreed imminently. Confirmation of the signing of the Option Agreement will be provided to the GNLP Team in due course.*

### **Achievable**

Based on the suitability assessment above, there are no site-specific constraints which could preclude the delivery of residential development on the site. Through the provision of a range of developments throughout the region, including with Aylsham, Hopkins Homes have demonstrated that they are committed and able to achieve the delivery of housing of large scale developments. Therefore, residential development on the site is deemed to be entirely achievable.

### **Viable**

Hopkins Homes 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 forthcoming 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 infrastructure, can be delivered on site without prejudicing the viability of the site. Hopkins Homes are keen to continue discussions with the GNLP Team on this matter as soon as possible.

### **Summary**

Aylsham is a highly sustainable location for growth, benefitting from a range of services and amenities, including a primary school, high school, a range of supermarkets (including Tesco, Budgens and Marks & Spencer), petrol station, doctor's surgery, and dentists, alongside a range of shops, services and employment opportunities.

As has been demonstrated, the site is suitable, available, achievable and viable, and is deliverable within the front part of the plan period. As previously recognised, there are no constraints which would affect the suitability of the site for residential development. The foregoing text demonstrates that this site is a suitable location for development and is capable of meeting the requirements of draft Policy GNLP0311, GNLP0595 and GNLP2060. Accordingly, Hopkins Homes fully supports the GNLP's proposals to allocate the site for residential development.

Notwithstanding the foregoing, a few minor alterations are proposed to the policy.

### **Revised Policy Wording**

**POLICY GNLP0311, 0595 and 2060 Land south of Burgh Road and west of the A140, Aylsham (approx. 12.86 ha) is allocated for residential development. The site is likely to accommodate at least 300 homes, 33% of which will be affordable, and new primary school.**

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:

- Access should be via Burgh Road. There will also need to be two access points.
- Carriageway realignment of Burgh Road may be needed to achieve required visibility.
- Carriageway widening is required to achieve a minimum width of 5.5m over the full frontage and a 2.0m footway (unless it can be demonstrated that the provision of road widening and footpath is neither required, practical or feasible) should also be provided to connect with the existing facility to west.

- Provision of land for a new primary school on site.

**Key**

**Amendment** – Proposed Amendments

– Proposed Text to be Removed

## APPENDIX A

# PREVIOUS REPRESENTATION GNLP0311, LAND SOUTH OF BURGH ROAD, AYLSHAM.

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# GNLP Regulation 18 Consultation Response

## GNLP0311 – Land to the south of Burgh Road, Aylsham

On behalf of Kier Living Eastern, we strongly recommend that site GNLP0311, Land to the south of Burgh Road, Aylsham, should be allocated for residential development, comprising approximately 250 homes with associated infrastructure, open space and landscaping. The site is considered to be entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2036.

Growth within the Main Towns will occur, albeit at differing scales, under all of the six potential Growth Options, as these are the most sustainable locations for further growth outside Norwich. Given that there is currently no preferred direction in terms of the Growth Options, it is considered that the key focus for the GNDP should be to identify sites that are deliverable, and represent the most sustainable form of development. This exercise will in itself identify the most appropriate strategy for Growth, which is likely to be a hybrid of the six options currently identified.

In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', set out in footnote 11 to paragraph 47, Site GNLP0311 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. These points are addressed in further detail below. A Concept Masterplan has been prepared by CSA environmental in support of this Representation, which demonstrates how development could come forward. In addition, technical evidence in relation to access, drainage, utilities, ground conditions, ecology and archaeology has been prepared, and is also submitted alongside this Representation.

### **Assessment of Deliverability**

#### ***Suitable***

The site is located on the south-eastern edge of Aylsham, one of the four Main Towns within the Greater Norwich area. It is recognised within the current Joint Core Strategy as a highly sustainable location, with the fourth highest level of shops and services outside Norwich, and good public transport links to Norwich. It has experienced significant housing growth since 2008, and the Site Proposals Document recognises that there is continuing strong market interest. Historically, waste water disposal issues have been seen as a potential constraint to further development, but progress has been made on this issue, and as set out below, a suitable strategy to deal with additional foul water flows has been identified for the site. Consequently, it is considered that Aylsham should be a key focus for additional growth in the period to 2036. As one of the Main Towns, a proportion of the planned growth will need to be accommodated here, regardless of which Growth Option is ultimately selected.

The site is located adjacent to residential uses on its northern, western and southern boundaries, and represents the most logical extension to the town. It provides an opportunity to reinforce the existing boundary vegetation along the southern and eastern boundaries, providing a clear and defensible boundary to the town, within the natural boundary created by the A140 bypass. It is located within easy walking distance of the wide range of services and facilities on offer in the town centre, as well as public transport links and employment opportunities.

In terms of more detailed site-specific considerations, the Housing and Employment Land Availability Assessment (HELAA) identifies the site as a suitable location for residential development. It confirms through a 'Green' rating, that there are no constraints or impacts anticipated in relation to accessibility to services, utilities infrastructure, contamination and ground stability, market attractiveness, significant landscapes, townscapes, biodiversity and geodiversity, historic environment, open space and green infrastructure or compatibility with neighbouring uses. Issues which are given an 'Amber' rating, or specifically referred to within the text of the Site Proposals consultation document, including access, utilities capacity, flood risk and transport and roads are addressed in more detail below.

#### Access, Transport and Roads

A Transport Note has been prepared by Rossi Long Consulting, and is submitted in support of this Representation. This identifies that the most suitable location for access to the site would be directly onto Burgh Road, as shown on the Concept Masterplan. Rossi Long Consulting's Note confirms that adequate visibility is available and a detailed sketch is provided. Junction capacity assessments undertaken for the development on Buckenham Road indicate that a priority T-junction would be appropriate in terms of capacity in this location.

There is existing footpath provision on Burgh Road, which any development could link in to, as well as providing pedestrian/cycle links through to Rippingall Road to the west and the Bure Valley Walk to the south which would provide a direct route for non-motorised users to the Tesco superstore and the town centre facilities beyond.

In terms of the wider road network, a roundabout has recently been installed at the Burgh Road/A140 junction. This was designed and implemented to accommodate the development traffic associated with the residential dwellings under construction to the north of Burgh Road, as well as Broadland District Council's requirements for housing in Aylsham and the wider area. Consequently, it is considered that the HELAA conclusions regarding this junction are now out of date.

#### Utilities Capacity

Utilities records have been sought from all providers, and demonstrate that a full range of utilities are available in the locality, including electricity, gas, potable water and telecommunications.

The text of the Site Proposals Document, specifically para 4.123, indicates that the main concern in relation to utilities capacity is regarding waste water disposal. A Drainage Impact Assessment has been prepared by Anglian Water Services, which provides a recommendation for mitigation to ensure that development would not cause detriment to the capacity of the sewer system nor result in increased flood risk downstream. This would comprise installation of 194m<sup>3</sup> of off-line storage at the proposed connection location in Burgh Road. This would, in part, be financed by developer contributions. Consequently, it is clear that waste water capacity should no longer be considered a constraint to further development in Aylsham and a deliverable solution exists which mitigates the impact of the development.

#### Flood Risk

A Flood Risk Screening Report has been prepared by Rossi Long Consulting and is submitted in support of this Representation. The Report confirms that the site is located within Flood Zone 1, and is therefore at low risk from fluvial flooding. However, a small part of the site is at high risk of surface water flooding, to a depth in excess of 900mm. This risk can be managed through appropriate masterplanning, ensuring that no dwellings are located within these areas, as demonstrated on the Concept Masterplan. There are, therefore, no flood risk related reasons why the site could not be delivered.

#### Other Matters

As outlined above, the HELAA gives a 'Green' rating to all other potential impacts/constraints. Further technical evidence has been obtained on a number of these points, which confirms the HELAA conclusion, and feeds into the Masterplan.

A Preliminary Ecological Appraisal has been undertaken by CSA environmental, which confirms that there are no overriding ecological constraints and, indeed, the development of the site would enable a range of ecological enhancement measures to be delivered which would be of benefit to local wildlife. The site is within 10km of the Norfolk Valley Fens SAC, but the Appraisal confirms that given the distance of the site from the SAC, development is very unlikely to have a significant adverse effect on the qualifying features of the designation through water abstraction or any other means. Similarly, impacts on the nearby County Wildlife Site (Marriott's Way) can be minimised, through the provision of on-site public open space.

An Archaeological Desk Based Assessment has been prepared by CgMs, which confirms that there are no designated heritage assets within the site. There will be no adverse impact on the nearby Grade II Listed Building of Bure Valley Farmhouse, due to the screening provided by intervening shelter planting and the lack of any associative link between the Listed Building and the site itself. Small numbers of prehistoric, Roman, Medieval and Post-Medieval finds are recorded as being found on the site. The finds are not indicative of any archaeological non-designated heritage asset within the site and the limited archaeological potential of the site does not suggest any reason to prohibit or constrain its allocation for residential development within the emerging GNLP.

A Desk Study Summary Investigation relating to ground conditions has been prepared by Rossi Long Consulting, which advises that the site does not have any clearly identifiable significant former industrial use and there are no related key contaminants. There are only limited plausible sources of low level contamination on site and no identified significant sources of contamination off-site. There are no concerns raised regarding ground stability.

In conclusion, therefore, it is clear from the above that the site is entirely suitable for residential and associated development. The Concept Masterplan demonstrates that the site could be developed to accommodate approximately 250 dwellings, together with open space. The technical evidence, outlined above and submitted alongside this Representation, demonstrates that there are no constraints to the delivery of the site.

#### ***Available***

The site is available for development immediately, and is currently under option to Kier Living Ltd. It is anticipated that it would take up to 5 years to complete the proposed development.

#### ***Achievable***

It is considered that residential development of the site in the short-term is entirely achievable. As detailed above, the site is currently under option to Kier Living Ltd, and an outline planning application could be brought forward quickly. As detailed above, there are no known constraints to delivery of the site, and, as detailed below, residential development of approximately 250 dwellings is considered viable at this stage.

#### ***Viable***

Development of the site for residential purposes is considered viable, taking into consideration the various policy requirements in relation to matters such as affordable housing provision and CIL contributions. There are no known abnormal costs that would prejudice the viability of the site.

#### **Summary**

As outlined above, the site is suitable, available, achievable and viable, and is therefore deliverable within the plan period. Development in this location would represent sustainable development, as defined within the National Planning Policy Framework. Aylsham, as a Main Town, with the fourth highest level of shops and services outside Norwich, is already acknowledged as a highly sustainable location for residential



growth, as evidenced through the significant quantum of development that has been approved in the last decade, and the foregoing text demonstrates that this specific site is a suitable location for further development in all respects.

Economically, residential development here in the plan period would help sustain and enhance local services and facilities, and would also provide employment opportunities during the construction period.

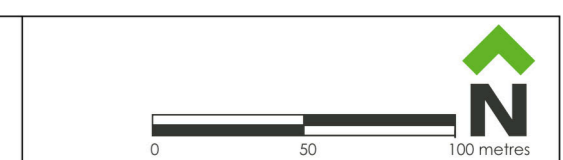
Socially, the scale of development envisaged is such that it will enable the creation of a strong, vibrant and healthy community, with easy access to existing and planned local services and facilities, as well as on-site open space. A wide mix of dwelling types, sizes and tenures will be provided to meet local needs, and CIL payments will ensure the provision of the necessary health and cultural facilities. The site is located in close proximity to established communities in Aylsham, which should assist in achieving social integration between the existing and new residents.

Environmentally, the site is located close to a range of services and facilities, and enjoys good access to sustainable transport options providing 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.

On this basis, the site should be taken forward as an allocation, and is capable of making an important contribution to the planned growth of the Greater Norwich Area in the period to 2036.

**APPENDIX B**  
**CONCEPT MASTERPLAN**

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- Site Boundary: **12.90ha**
- Potential residential area: **7.03ha**
- Potential location for primary school: **2ha**
- CONTEXT**
- Development under construction
- Nearby planning application
- Existing contours
- Green Space (Policy EN2)
- Nearby facilities
- Existing surface water sewer and easements
- Existing foul sewer and easements
- Existing overhead electricity cable
- CIRCULATION**
- Main vehicular routes and existing bus stops
- Bure Valley Path
- Existing public footpaths
- Potential vehicular and pedestrian access points
- Indicative streets through the development
- Potential recreational routes through the development
- FLOOD RISK & DRAINAGE**
- Existing water features
- Extent of surface water flooding
- Potential locations for drainage (SuDS) basins
- GREEN INFRASTRUCTURE & PLAY PROVISION**
- Existing trees and hedgerows
- Potential public open space to serve the new development
- Potential structural tree planting
- Potential play provision:
  - 1 No. LEAP (Local Equipped Area for Play)
  - 1 No. LAP (Local Area for Play)

Rev	Date	By	Description
A	13/03/20	SM	Updated site boundary

**CSA**  
environmental

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csaenvironmental.co.uk

Project	Land at Burgh Road, Aylisham		
Title	Concept Masterplan		
Scale	1:2500 @ A2	Drawn	SM
Date	March 2020	Checked	RR
Drawing No.	CSA/4886/100	Rev	B

**APPENDIX C**  
**TRANSPORT NOTE**

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Project Ref: 201055

Date: 12 March 2020

## Transport Note – Rev. 01

### Land South of Burgh Road

### Aylsham, Norfolk

#### 1.0 Introduction

This report has been prepared by Rossi Long Consulting (RLC) to support proposals for residential development on land south of Burgh Road and west of the A140, Aylsham.

The site covers an area of approximately 12.86ha and is currently being proposed for approximately 300No. residential dwellings and a new primary school.

The site has been identified as a preferred allocation in the draft Greater Norwich Local Plan (GNLP0311, GNLP0595, and GNLP2060).

This preferred allocation outlines that development on the site must address the following specific matters:

- Access should be via Burgh Road. There will also need to be two access points;
- Carriageway re-alignment of Burgh Road may be needed to achieve required visibility;
- Carriageway widening is required to achieve a minimum width of 5.5m over the full frontage and a 2.0m footway should also be provided to connect with the existing facility to west;
- Provision of land for a new primary school on site.

The purpose of this note is to provide up-to-date information to demonstrate the site's suitability in terms of accessibility matters, and thus better inform the GNLP process.

This note seeks to demonstrate the suitability of the site, from an access and transport perspective.

## 2.0 Accessibility

The site is located just to the east of Aylsham town centre, within easy walking and cycling distance of the town centre, schools, and retail, leisure and employment opportunities.

Strategically the site benefits from close links to the A140 via a new roundabout junction adjacent to the site which connects with Burgh Road.

Planning permission has recently been granted for 22No. residential dwellings on the site of the former Aegel House Care Home in the north-west corner of the site. There is also a large new (300No. dwellings) residential development located to the north of Burgh Road – accessed off Buckenham Road ('Bure Meadows').

This shows that the principle of residential development in this location and access taken from Burgh Road is considered to be acceptable by the local planning and highway authorities.

A site visit has been undertaken by Rossi Long Consulting to review the potential suitable points of access; the conclusion of which confirmed that the most suitable points of access would be on to Burgh Road to the north of the site. No direct access would be sought from the A140 principal route to the east.

A photo showing the site frontage on to Burgh Road and local footpath links is provided below:



As part of development on the site, footways of 2.0m width will be provided along the site frontage, linking to existing facilities. This will be achieved on client and highway authority owned land. Provision would be made to connect with existing footways towards Aylsham town centre, which are most suitable on the northern side of Burgh Road.

Bus stops providing access to both local and further afield services are provided on Burgh Road adjacent to the site.

The site layout will be designed to accord with local highway authority requirements, with appropriate turning head facilities provided to allow vehicles such as refuse vehicles to turn and enter/egress the site in forward gear.

According to Norfolk County Council's (NCC's) design guidance for the size of development proposed and the preferred allocation in the draft GNLP, two points of access will be provided from Burgh Road.

The siting of the access junctions will provide required visibility splays, avoid conflict with the Buckenham Road junction and existing site accesses, and also take into account level differences within the site.

Initial on-site assessment shows that visibility splays of 2.4m x 59.0m are achievable from the site accesses on to Burgh Road. The current speed limit of Burgh Road is 30mph; therefore, 59.0m is considered appropriate for speeds up to 37mph (according to the Department for Transport's 'Manual for Streets 2' document).

If, at detailed design stage, the carriageway of Burgh Road is found to be less than 5.5m in width along the site frontage, appropriate realignment and widening will be provided (using client and highway authority land) to support any planning application.

It is proposed that the site access junctions would take the form of Priority T-junctions with Burgh Road, with key site access roads developed to a 'Type 2' and 'Type 3' standard to accord and provide for the quantum of dwellings proposed.

An initial sketch of the proposed site access junctions is provided appended to this report (see Drawing No. 201055/SK-001).

Suitable dropped kerb crossing facilities, along with tactile paving will be provided to assist crossing for those less able. This provision would enable continuous access for pedestrians from the site to connect with the local schools and other facilities / services within Aylsham town centre.

Notwithstanding this, the provision of a primary school on the site would greatly assist the sustainability of both the proposed and existing residential dwellings in the area.

Junction capacity assessments undertaken for Bure Meadows confirm that Priority T-junctions would likely be appropriate in terms of capacity in this location.

Two additional possible points of access may be possible for emergency vehicles / non-motorised users - Rippingall Road to the west of the site (an existing residential cul-de-sac) and Station Road to the south-west of the site.

These routes would also provide a more direct route from parts of the site to Aylsham town centre, the Railway Station and Tesco Superstore. Further investigation of the feasibility of these routes will be undertaken to support a planning application.

A short distance to the east of the site is the newly constructed A140/Burgh Road 4-arm roundabout junction. This roundabout was designed and implemented to accommodate the development traffic associated with the residential dwellings currently being constructed to the north of Burgh Road (off Buckenham Road), and facilitate future housing growth within Aylsham.

Therefore, it is assumed that the roundabout could accommodate the traffic associated within the Aylsham area, although naturally traffic modelling will be conducted to demonstrate – as part of a comprehensive Transport Assessment in support of any future planning application for the site.

A Transport Assessment will be provided as part of any future planning application for the site, and will confirm the suitability of the proposed access locations on to Burgh Road, including visibility and tracking assessments, appropriate junction capacity modelling, along with a detailed review of accessibility by sustainable modes.

Furthermore, a site-wide Travel Plan would also be provided to support the proposed development, and to encourage and demonstrate uptake of travel by sustainable modes.

### 3.0 Highway Safety

It is also important to review and identify any significant highway safety issues and provide an analysis of the recent accident history of the study area.

The Government has released accident data for England and Wales under the OGL open data licence. Based on this data, the 'Crashmap' website enables accidents to be shown on a map.

'Crashmap' uses data collected by the police about road traffic accidents occurring on British roads where someone is injured. This data is approved by the National Statistics Authority and reported on by the Department for transport each year. The site uses data obtained directly from official sources but compiled into an easy-to-use format showing each incident on a map.

A check has been made of the accident records in the vicinity of the site on Burgh Road, Aylsham.



No 'slight', 'serious' or 'fatal' accidents have been recorded within the locality of the site on Burgh Road during the most recent 5-year period available from 2015 to 2019 inclusive.

The absence of accidents recorded in the vicinity of the site indicates that there are no inherent safety concerns to take into account with regards to taking access to the site from Burgh Road.

## 4.0 Summary

This Transport Note has been prepared by Rossi Long Consulting, demonstrating the suitability of preferred allocation GNLP0311, GNLP0595, and GNLP2060 for residential development and land for a primary school, in terms of highways and accessibility. It has also been demonstrated that all of the requirements of the preferred allocation, in highways and access terms, can be achieved as part of development on the site.

From the work undertaken it is evident that the proposed access/highway strategy will be in accordance with local/national policy.

In summary, the evidence provided within this Note indicates that there are no reasonable safety, capacity, sustainability or access reasons why the proposed site should not be allocated for development.

Prepared by	Reviewed by
<b>Luke Fairall</b> BA(Hons), MCIHT, MTPS Associate	<b>Mike Lloyd</b> BEng(Hons), CEng, MIStructE Director

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**APPENDIX D**  
**FLOOD RISK SCREENING & SCOPING**  
**REPORT**

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Project Ref: RAC/SJB/201055 [Rev 00]

Date: 05 March 2020

## Flood Risk Screening and Scoping

Land south of Burgh Road

Aylsham

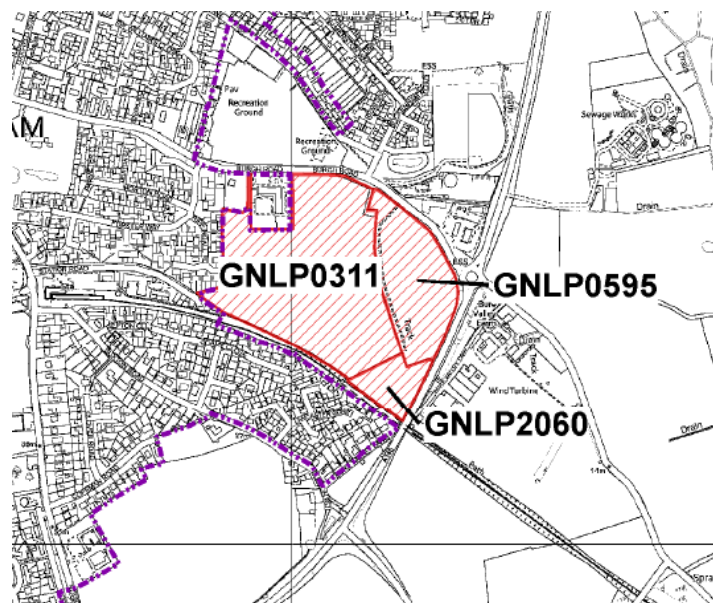
Norfolk

### 1.0 Introduction

This report has been prepared by Rossi Long Consulting to support proposals for development of land south of Burgh Road, Aylsham.

The site is being promoted for residential development and a Flood Risk Screening and Scoping Exercise is required to assess preliminary flood risk issues and surface water drainage options for the site.

The site has previously been submitted as part of the Greater Norwich Local Plan (GNLP) draft preferred housing allocations consultation (ref: GNLP0311, GNLP0595, and GNLP2060). A location plan is shown below:



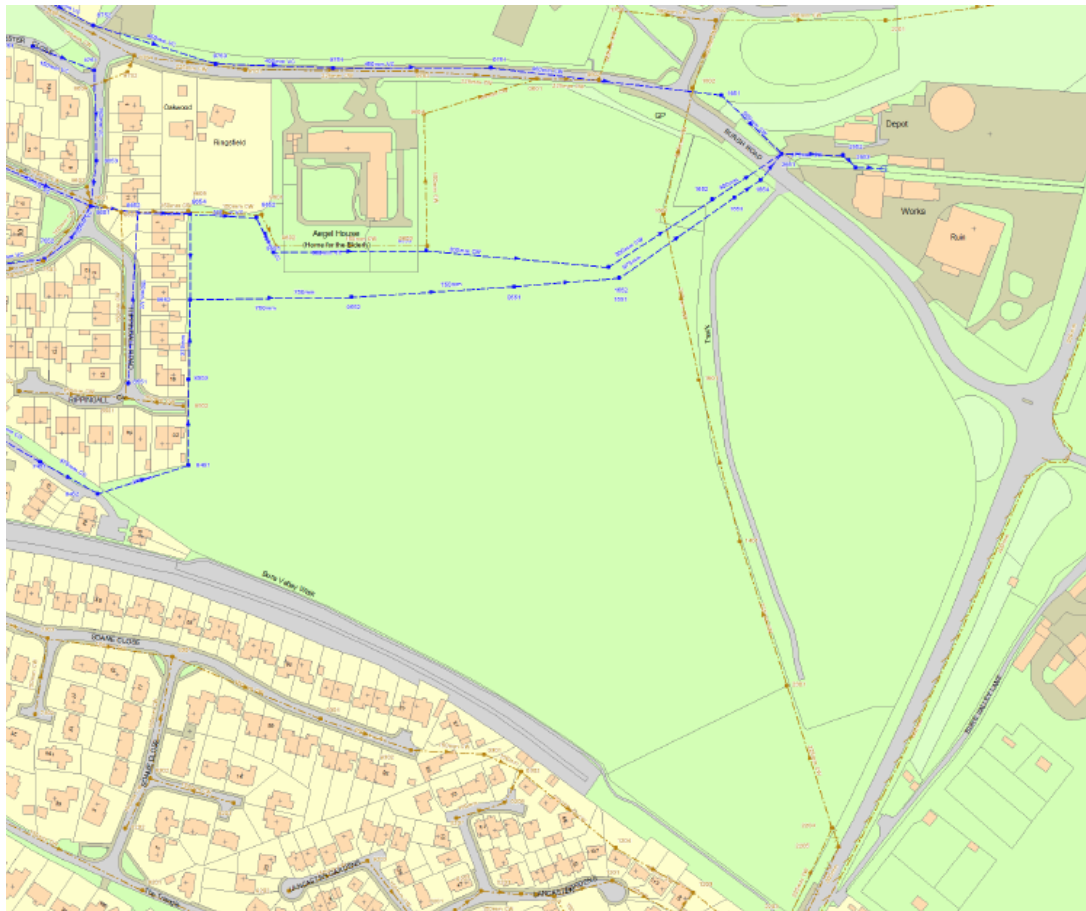
## 2.0 Site Description

The site is 12.86 hectares of land, situated south of Burgh Road, Aylsham to the west of the A140 Cromer Road. The Bure Valley Railway is immediately to the south of the site. The Ordnance Survey grid reference at the centre of the site is TG 201 264.

Ordnance Survey mapping shows that the 20.0m AOD contour passes through the centre of the site with ground levels falling towards the north. The River Bure is located east of the A140 with ground levels below 10.0m AOD.

Site levels confirm the general fall of the land towards the north. Ground levels in the south-west corner are at about 23.5m AOD, falling to 12.5m AOD near to the centre of the Burgh Road site frontage. Burgh Road itself is up to 3.0m higher than this low point on the site.

Anglian Water records show that public foul and surface water sewers cross the site in various locations. An extract of the plan is shown below with full details included in the Appendix:



### 3.0 Ground Conditions

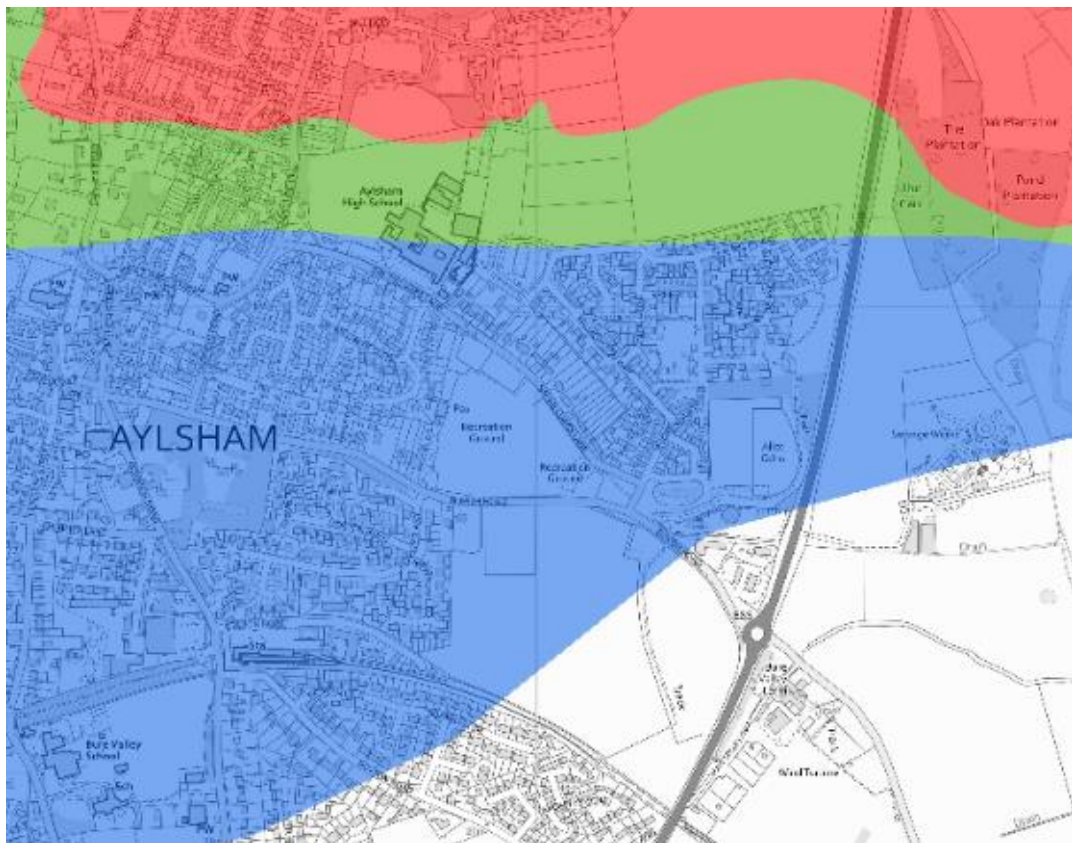
BGS mapping shows that the site is situated upon superficial deposits of Bacton Green Till Member – Diamicton (stony diamicton with beds / laminae of sorted material including sand, silt and clay):



The underlying bedrock geology is the Wroxham Crag Formation (Sand and Gravel).

In terms of groundwater vulnerability, the south of the site overlies a Secondary B Aquifer with respect to the superficial geology and a Principal Aquifer with respect to the bedrock geology.

The site is partially situated within a Groundwater Source Protection Zone, Zone III – Total Catchment, shown blue below:

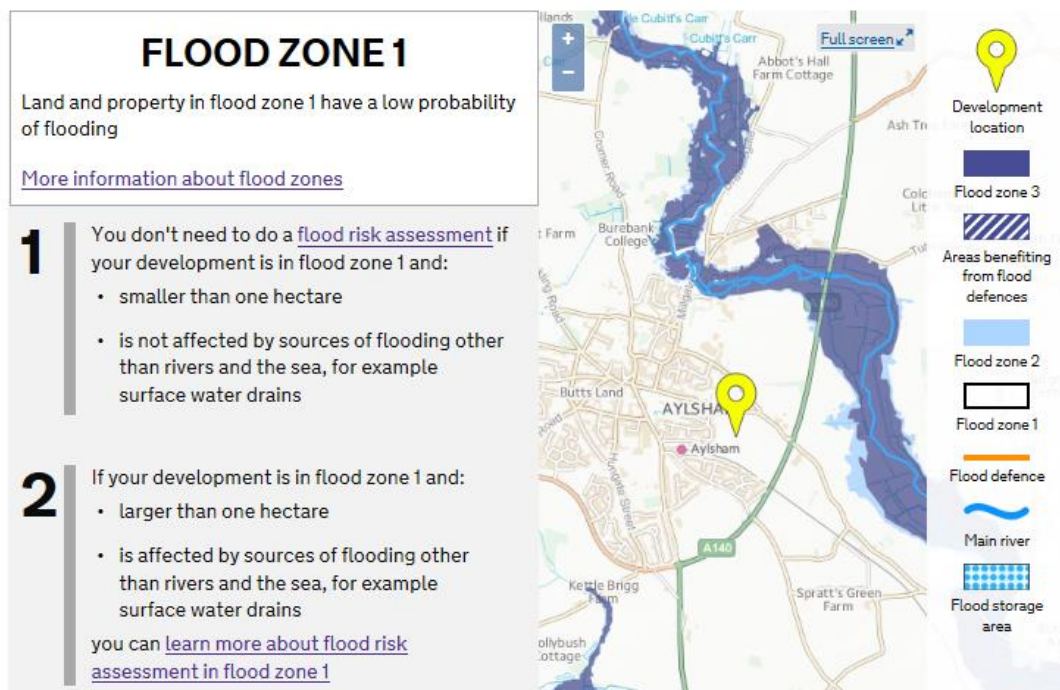


## 4.0 Flood Risk

**Fluvial Flooding:** Environment Agency flood risk mapping showing the risk from fluvial flooding is shown below. This confirms that the site is situated in Flood Zone 1. Flood Zone 1 is a 'low probability' flood zone comprising land assessed as having a less than 1 in 1000 annual probability of river flooding in any year (<0.1%). All uses of land are appropriate in Zone 1 and the National Planning Policy Framework (NPPF) Sequential and Exception Tests are not required:

### Flood probability

Your proposed development is in an area with a low probability of flooding



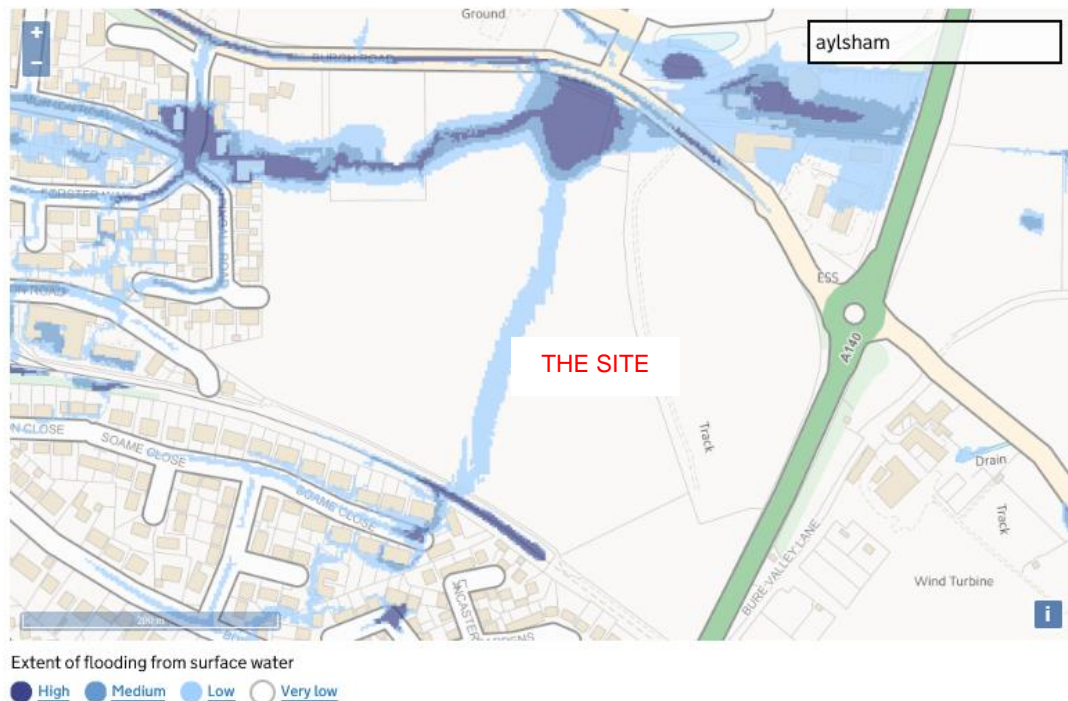
For development proposals on land greater than one hectare, a Flood Risk Assessment is principally required to consider the management of surface water run-off together with flood risk from sources other than rivers and the sea. Surface water arising from a developed site should, as far as practicable, be managed in a sustainable manner to mimic the surface water flows arising from the site prior to the proposed development, while reducing the flood risk to the site itself and elsewhere, taking climate change into account.

**Groundwater flooding** occurs when water levels in the ground rise above surface elevations. BGS mapping includes information for a nearby borehole that indicates an 'at rest' GWL 11.0m below ground level (bgl). The risk of groundwater flooding is 'low' but is subject to confirmation from a detailed site investigation.

Flooding from surface water sewers occurs when sewers are overloaded following heavy rainfall. Surface water sewers are known to cross the site and Anglian Water, Broadland District Council and the Lead Local Flood Authority (LLFA) should be consulted regarding any record of flooding from these sewers.

Flooding from Reservoirs and Other Artificial Sources: The Environment Agency publishes mapping that shows the extent of flooding from these sources and confirms the site is not at risk of flooding.

Surface water flooding occurs when intense rainfall is unable to soak into the ground or enter drainage systems but lies on or flows over the ground instead. The Environment Agency publishes mapping showing the risk of flooding from surface water; an extract of which is shown below:



The great majority of the site is at 'very low' risk of surface water flooding:

'Very low' risk means that each year this area has a chance of flooding of less than 0.1% (< 1 in 1000).

The mapping indicates that surface water flooding is routed through the site from two directions. The first enters the site from the western boundary and flows east and north towards Burgh Road. The map indicates that there is a 'high' risk of this flow path developing. The second flow path enters the site from midway along the southern boundary, flowing north towards Burgh Road where the two flow paths merge before flowing eastwards off-site. The map indicates that there is a 'low' risk of this flow path developing:

'High' risk means that each year this area has a chance of flooding of greater than 3.3% (> 1 in 30);

'Medium' risk means that each year this area has a chance of flooding of between 1.0% and 3.3% (1 in 100 to 1 in 30);

'Low' risk means that each year this area has a chance of flooding of between 0.1% and 1.0% (1 in 1000 to 1 in 100).

From interrogation of the detailed surface water flood risk map, predicted flood depths range from "below 300mm" to areas of "over 900mm" deep. The Norfolk Lead Local Flood Authority (LLFA) will view the 'low' risk scenario as an indication of the risk of flooding during the 1% AEP event with an allowance for climate change. As part of any planning application, a Flood Risk Assessment will need to demonstrate (for all storm durations up to and including the 1% AEP event +40% allowance for climate change) that:

- the proposed dwellings are not at risk of flooding from surface water; and
- the development does not increase the risk of surface water flooding off-site.

The simplest way to achieve this is to ensure that all areas at 'low' to 'high' risk of flooding, as indicated on the Environment Agency maps, remain free of development. All housing, infrastructure and drainage features should be located in areas at 'very low' risk of flooding, with ground levels maintained as existing so as not to affect the route and flood depth of the flow path.

If areas at risk of flooding are to be considered for development, a hydraulic modelling exercise will be required to show:

- development within the flood risk areas does not increase the risk of flooding elsewhere;
- finished floor levels of the proposed dwellings are a minimum of 300mm above adjacent flood levels;
- safe access and egress to all dwellings can be maintained during a flood event; and
- the effect of surface water flooding on SuDS features and on-site drainage systems.

## 5.0 Surface Water Drainage

British Geological Survey (BGS) mapping indicates that site ground conditions *may not* be suitable for infiltration of surface water run-off. National Planning Policy requires that sustainable drainage systems for the management of run-off are put in place, unless demonstrated to be inappropriate. Generally, the aim should be to discharge surface run-off as high up the following hierarchy of drainage options as reasonably practicable:

- Into the ground (infiltration);
- To a surface water body;
- To a surface water sewer, highway drain or another drainage system;
- To a combined sewer.



Site investigation is required to confirm ground conditions and should include infiltration testing in accordance with the requirements of BRE Digest 365. If infiltration of run-off is not feasible, an off-site discharge to a watercourse should be investigated. For any off-site discharge of surface water, run-off should be limited to the equivalent 'greenfield' run-off rate for the site for all storms up to and including the 1% AEP event plus allowance for climate change. This is to ensure that the development does not increase the risk of flooding on or off the site. Peak flows would need to be attenuated in a lagoon or below ground storage with the final discharge controlled by a flow limiting device. If no watercourses are available, agreement will need to be reached with Anglian Water for discharge to the public surface water sewer. Public sewer details are included in the Appendix to the rear of this report.

The development layout will need to accommodate the existing on-site public sewers, providing an appropriate easement distance for future maintenance dependent upon the diameter and depth of the sewers. Easement distances in the range of 3.0 – 6.5m either side of the centre line of the sewers will be required. Diversion of public sewers may be an option.

## 6.0 Conclusions and Recommendations

With reference to Environment Agency flood zone mapping, it is demonstrated that the site is situated in Flood Zone 1. This is a "low probability" flood zone with a less than 1 in 1000 annual probability of flooding. The site is at 'low' risk of fluvial flooding both now and over the lifetime of any development, taking climate change into account.

The NPPF Sequential and Exception Tests are not required.

The site is generally at 'very low' risk of flooding from surface water; however, areas of 'high', 'medium' & 'low' risk flooding have been identified that are routed through the site with predicted flood depths in the range "below 300mm" to "over 900mm". Ideally these areas should be left undeveloped with all housing, infrastructure and drainage features located in areas of the site at 'very low' risk of flooding. If, however, housing is required in higher flood risk areas, hydraulic modelling will be required to demonstrate that the development will remain safe and not increase flood risk elsewhere.

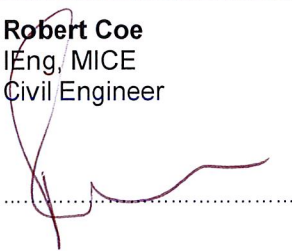
Site investigation is required to confirm ground conditions, but it is anticipated that infiltration of surface water run-off into the ground is unlikely to be a viable option for the site. Any off-site discharge will need to follow the fall of the land into the natural river catchments serving the site and be attenuated to 'greenfield' run-off rates. Off-site drainage routes and land ownership will need to be established, including any easement requirements for land in third party ownership. If an off-site route to a watercourse is not feasible, a discharge to the public surface water sewer could be considered.

In order to complete a Flood Risk Assessment and Surface Water Drainage Strategy for a planning application, additional information is required as follows:

- Geotechnical site investigation to include infiltration testing in various locations;
- Full topographical site survey and investigation of any off-site drainage routes; and
- Development of a site layout to ideally place housing in areas at 'very low' risk of surface water flooding and provision of open space areas for locating SuDS attenuation features.

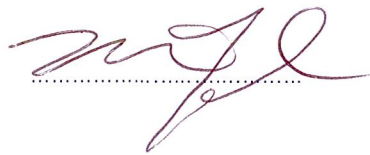
**Prepared by**

**Robert Coe**  
IEng, MICE  
Civil Engineer



**Reviewed by**

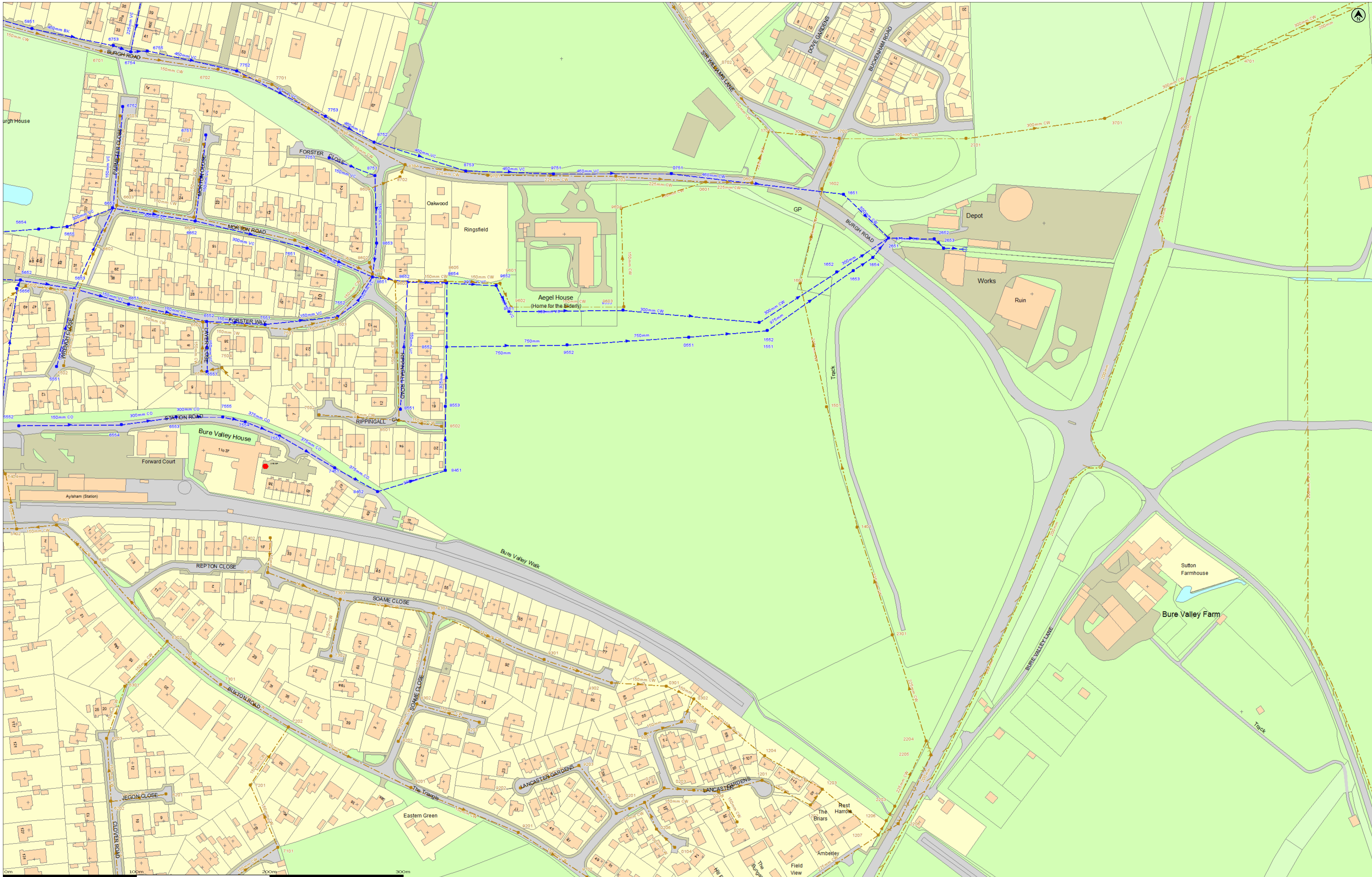
**Mike Lloyd**  
BEng(Hons), CEng, MIStructE  
Director



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Appendix – Public Sewer Details



This plan is provided by Anglian Water pursuant to its obligations under the Water Industry Act 1991 sections 198 or 199. It must be used in conjunction with any search results attached. This information on this plan is based on data currently recorded but position must be regarded as approximate. Service pipes, private sewers and drains are generally not shown. Users of this map are strongly advised to commission their own survey of the area shown on the plan before carrying out any works. The actual position of all apparatus MUST be established by trial holes. No liability whatsoever, including liability for negligence, is accepted by Anglian Water for any error or inaccuracy or omission, including the failure to accurately record, or record at all, the location of any water main, discharge pipe, sewer or disposal main or any item of apparatus. This information is valid for the date printed. This plan is produced by Anglian Water Services Limited (c) Crown copyright and database rights 2017 Ordnance Survey 100022432. This map is to be used for the purposes of viewing the location of Anglian Water plant only. Any other uses of the map data or further copies is not permitted. This notice is not intended to exclude or restrict liability for death or personal injury resulting from negligence.

- |                               |  |                               |  |
|-------------------------------|--|-------------------------------|--|
| Foul Sewer                    |  | Outfall                       |  |
| Surface Sewer                 |  | Colour denotes effluent type) |  |
| Combined Sewer                |  | Inlet                         |  |
| Final Effluent                |  | Colour denotes effluent type) |  |
| Rising Main                   |  | Manhole                       |  |
| Colour denotes effluent type) |  | Colour denotes effluent type) |  |
| Private Sewer                 |  | Sewage Treatment Works        |  |
| Colour denotes effluent type) |  | Pumping Station               |  |
| Decommissioned Sewer          |  |                               |  |
| Colour denotes effluent type) |  |                               |  |

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APPENDIX 2

UPDATED CONCEPT MASTERPLAN

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- Site Boundary: 12.90ha
  - Potential residential area: 7.03ha
  - Potential location for primary school: 2ha (location of school subject to further discussions with NNC Highways and NCC Education)
- CONTEXT**
- Development under construction
  - Nearby planning application
  - Existing contours
  - Green Space (Policy EN2)
  - Nearby facilities
  - Existing surface water sewer and easements
  - Existing foul sewer and easements
  - Existing overhead electricity cable
- CIRCULATION**
- Main vehicular routes and existing bus stops
  - Potential locations for new pedestrian crossing facilities
  - Bure Valley Path
  - Existing public footpaths
  - Potential vehicular and pedestrian access points
  - Indicative streets through the development
  - Potential recreational routes through the development
- FLOOD RISK & DRAINAGE**
- Existing water features
  - Extent of surface water flooding
  - Potential locations for drainage (SuDS) basins
- GREEN INFRASTRUCTURE & PLAY PROVISION**
- Existing trees and hedgerows
  - Potential public open space to serve the new development
  - Potential structural tree planting
  - Potential play provision:
    - 1 No. LEAP (Local Equipped Area for Play)
    - 1 No. LAP (Local Area for Play)
    - Trim Trail stations

\*Subject to further advice

**\*SUBJECT TO FURTHER ADVICE**

C	05/08/20	SM	Updated to reflect client's comments
Rev	Date	By	Description
Dixies Barns, High Street, Ashwell, Hertfordshire SG7 5NT t 01462 743647 e ashwell@csaenvironmental.co.uk w csaenvironmental.co.uk			
Project	Land at Burgh Road, Aylsham		
Title	Concept Masterplan		
Scale	1:2500 @ A2	Drawn	SM
Date	March 2020	Checked	RR
Drawing No.	CSA/4886/100	Rev	C

**APPENDIX 3**

**STATEMENT OF COMMON GROUND**

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Greater Norwich Local Plan (GNLP) Site Allocation Statement of  
Common Ground (SoCG)

Between

Broadland District Council, South Norfolk Council,  
Norwich City Council, Norfolk County Council

And

Site Reference:

Site Address:

Proposed Development:

## Introduction

The Greater Norwich authorities want to ensure sites allocated in the GNLP are achievable, where possible wholly compliant with all relevant planning considerations, and deliverable in a timely way. It is with that purpose in mind that landowners, agents and developers with a site likely to be included in the GNLP are being asked to agree a Site Allocation Statement of Common Ground (SoCG). Each SoCG will be available to the inspector appointed to examine the GNLP so that they can satisfy themselves of the commitment to deliver each site and to meeting local plan requirements.

The GNLP Team wants the process of agreeing a SoCG to be a frank but collaborative process for all parties concerned. In the case of most sites, this process is likely to commence in Autumn 2020 and conclude in 2021 as the Regulation 19 submission draft of the GNLP is finalised. For other sites, for example where development may entail abnormal costs, discussions may continue in to 2022, as the GNLP reaches its examination in public.

This SoCG template has been designed with consideration to the possibility of future planning reforms. It is deliberately straightforward and only asks the questions that any landowner, agent, or developer would naturally ask themselves. The template only requires 700 words of written response to complete, but its importance should not be underestimated.

The GNLP Team regards the viability and timely delivery of development as a high priority. Therefore, the working assumption is without a SoCG a site is unlikely to be allocated.

## General Guidance

When completing the SoCG template please be precise. For example, in the description of development proposed, use the appropriate GNLP four-digit reference code, as well as giving a site address (including a postcode or eastings/northings reference).

Signatories to the SoCG should include all relevant parties with a role in bringing forward the proposed development. This should include all landowners, agents, developers, and possibly end-users of the development (if known).

## Greater Norwich Local Plan (GNLP)

The SoCG template contains a series of free-text questions that are designed to be answered within 100 words. If for whatever reason answering one or more of these questions is not possible or proves difficult site promoters are welcome to seek guidance from the GNLP Team. This may lead to completing the SoCG with a description of what issues remain for resolution at a future date.

Completing this SoCG template should be done with reference to the draft policies associated to the GNLP. Notable examples that will likely affect the form of development on site and its construction costs include:

- Provision of green infrastructure and suitable alternative green space (known as SANGS) under Policy 2 Sustainable Development and Policy 3 Environmental Protection and Enhancement; and,
- Obligations for affordable housing under Policy 5 Homes.

It should also be noted that completing a SoCG is a separate exercise from other data requests made by the Greater Norwich Local Plan Team, or the Greater Norwich authorities. For example, this is a separate exercise to the Five-year Housing Land Supply statements that are requested for the Annual Monitoring Report.

### **Commercially Sensitive or Other Confidential Information**

By submitting a SoCG you are consenting to the details about you and your site/s being published and available for public viewing. Any information that you consider to be confidential or commercially sensitive and would not want published should be excluded from this form.

By signing you are agreeing to the information provided being to the best available knowledge accurate, and that it can be used in preparation of the Greater Norwich Local Plan (GNLP) – and used in evidence at the public examination of the GNLP.



1. Please provide a commentary on the site's progress in respect to the three tests of being available, suitable, and deliverable.

*[Approximately 100 words recommended]*

2. Please provide a commentary on any land ownership constraints that may affect or delay development of the site.

*[Approximately 100 words recommended]*

3. Please provide a commentary on progress to making a planning application – such as pre-application advice, or if planning permission exists on all or part of the site.

*[Approximately 100 words recommended]*

4. Please provide a commentary on the site's delivery, for example a predicted start-on-site, the annual rate of delivery, and the development's likely completion date.

*[Approximately 100 words recommended]*

5. Please provide a commentary on engagement held with statutory bodies and if any agreements have been made.

*[Approximately 100 words recommended]*

6. Please provide a commentary on any known technical constraints about the site – such as but not limited to highways, heritage, or ecology.

*[Approximately 100 words recommended]*

7. Please provide a commentary on community benefits the site will offer – such as but not limited to land and/or buildings for education and community provision.

*[Approximately 100 words recommended]*

# Greater Norwich Local Plan (GNLP)

Signed on Behalf of the Greater Norwich Development Partnership	Date
---	------

Signed on behalf of	Date
---------------------	------



**NORWICH**  
City Council



Working with

 **Norfolk** County Council