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Dear Sirs,

GREATER NORWICH LOCAL PLAN PRE-SUBMISSION DRAFT STRATEGY REGULATION 19 PUBLICATION STAGE

Land to the east of Aylsham Road, Buxton (site ref. GNLP0297)

Savills (UK) Ltd are instructed on behalf of landowner 'Executors of JM Crane Will Trust' and 'Trustees of the JM Crane Children's 2001 Settlement' to submit representations to the consultation on the Publication / Pre-Submission draft Greater Norwich Local Plan (Pre-Submission Plan / GNLP) and accompanying evidence base, including in respect of Land to the east of Aylsham Road, Buxton (site ref. GNLP0297).

Supporting documents:

- Access Feasibility Letter produced by Richard Jackson Engineering Consultants dated 15th March 2021
- Baseline Landscape and Visual Impact Assessment produced by The Landscape Partnership dated March 2021
 - Appendix 1 – LVIA Methodology
 - Appendix 2 – LVIA Figures
- Preliminary Ecological Appraisal produced by The Landscape Partnership dated March 2021
- Draft Statement of Common Ground for Land to the east of Aylsham Road, Buxton (site ref. GNLP0297)

This letter, along with the enclosed documents (including completed representation form) comprises our representations to the consultation.

Policy GNLP0297 – Land east of Aylsham Road, Buxton

Policy GNLP0297 allocates Land east of Aylsham Road, Buxton (1.68ha) for residential development to accommodate approximately 40 homes. The Greater Norwich Local Plan evidence base identifies within the 'Site Assessment Appendix A – Tables of Allocated Sites with reasons for allocation' document, in respect of GNLP0297 that *"This is the only site put forward which is considered suitable for allocation in Buxton. It has been chosen within an accessible walking/ cycling distance of facilities such as Buxton Primary School..."*. Within the HELAA assessment the site scored green on all categories apart from: Access, Utilities Capacity, and Transport and Road Impacts where the site scored an amber rating. The information submitted as part of these representations demonstrate that how these matters have been considered and can be controlled via appropriately worded policy criterion.

The landowners have promoted this site for delivery and have submitted a draft Statement of Common Ground setting out anticipated timescales for delivery at the site based on available data.

Support is also given to the draft policy wording: *'More homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints'*.

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The policy identifies a number of specific matters to be addressed as part of an application submission which are considered in turn below.

- 1) ***'Access (vehicular and pedestrian) will be from Aylsham Road'***.
- 2) ***'Lower speed limit will need to be extended'***
- 3) ***'Footway will be required at north east side of Aylsham Road to connect with existing facility and provide continuous pedestrian route to the school'***

Please refer to the accompanying Access Feasibility Letter produced by Richard Jackson Engineering Consultants (March 2021). This letter considers the potential for up to 50 dwellings at the site given the flexibility stated within the draft policy wording. It demonstrates how development at the site allocation could comply Draft Policy0297 criterion 1 to 3 as stated above.

A Preliminary Access Design (Drawing Ref: 61133/PP/SK01) has been prepared for the site relating to vehicles and pedestrians as required by the draft policy. It is noted that the current 30mph speed limit ends prior to the proposed site access. It is therefore proposed that is relocated further to the north of the proposed site access through a Traffic Regulation Order. The requisite visibility splays have been provided on this basis.

In addition, consideration has been given to the provision of a new footway connection along the north eastern side of Aylsham Road as requested within the Greater Norwich HELAA assessment and the draft policy wording. This new footpath will connect to the existing highway network to provide for a safe route to school that is not reliant upon travel via private vehicle.

- 4) ***'Some hedgerow and tree removal likely for visibility and access but aim to minimise loss of contribution to the landscape'***.
- 5) ***'Landscaping to mitigate the potential for noise pollution and vibrations resulting from proximity of the site to the Bure Valley Railway and to mitigate for the potential loss of views experienced by users of the nearby Public Right of Way.'***

Please refer to the accompanying Baseline Landscape and Visual Impact Assessment produced by The Landscape Partnership for the site.

In respect of Draft Policy0297 criteria 4, it is acknowledged that there will inevitably be some loss of existing vegetation to accommodate the new access and visibility splays at the site. The Baseline Landscape and Visual Impact Assessment recommends at page 22 that compensatory planting should take place on a new alignment to maintain the integrity of the boundary features and the overall vegetation cover. As such it demonstrated how development at the site allocation could comply Draft Policy0297 4 as stated above.

In respect of Draft Policy0297 criteria 5, the accompanying Baseline Landscape and Visual Impact Assessment has considered the relationship of the site to existing Public Rights of Way (PROW) and relevant views have been provided for context. It is noted that there are no PROW crossing the site but there are some PROW in the surrounding landscape including:

- Public Footpath Buxton with Lamas FP5 - commences at Stracey Road within the urban area of Buxton, to the south of the site, and continues northwards and then eastwards out of the settlement before crossing the Bures Light Railway. From here it continues northward into the Bure valley at Oxnead.
- 'Bure Valley Path' – which is a footpath and cycleway that follows the line of the Bure Valley narrow gauge railway line.

The possible effects of development upon the viewpoints taken from the public right of way in proximity to the site are considered are provided at page 26 of the Baseline Landscape and Visual Impact Assessment along with recommendations for landscape mitigation; this includes the provision of new planting particularly along the northern site boundary.

Draft Policy0297 criteria 5 also makes reference to landscaping to mitigate the potential for noise pollution and vibrations resulting from proximity of the site to the Bure Valley Railway. The Bure Valley Railway is a tourist

attraction which operates narrow gauge steam locomotives and typically operates at full capacity during the school holiday period. However, unfortunately due to Covid-19 the Bure Valley Railway steam has not operated at capacity since prior to Christmas. As this is a fairly unique railway line there is limited available comparable data which could be used to estimate the impact upon the proposed development. It is anticipated that any planning application at the site would need to be accompanied by a Noise Impact Assessment considering the railway operating at its peak to ensure the proposals incorporate mitigation measures as necessary.

6) 'Development will need phasing in line with upgrades to the Aylsham Water Recycling Centre'. Objection is raised to draft Policy GNLP0297 criteria 6 on the basis that there is ambiguity regarding the justification for its inclusion in respect of this specific site. In addition the wording could be interpreted as seeking to unnecessarily limit the delivery of housing at the site and therefore comment is made about the consistency with planning practice guidance of the criteria.

It is noted that the Statutory Water and Sewerage Undertaker has a statutory duty to make provision for essential water supplies and the collection, treatment and disposal of used water. It is stated in the Greater Norwich Infrastructure Needs Report 2021 that "AW's *Water Resources Management Plan does not identify a need for additional water supply infrastructure to serve growth in Greater Norwich to 2038*" (para 3.1.2). Notwithstanding this, it is stated at paragraph 6.14 of the Local Plan that "*There is not currently enough capacity in Aylsham Water Recycling Centre to accommodate development and no plans to upgrade in terms of flow...*".

In respect of Buxton, the Greater Norwich Water Cycle Study identifies that the existing capacity at the Aylsham Water Recycling Centre, as operated by Anglian Water Services, is controlled via permit. It is identified in the report that '*Aylsham WRC's flow permit would be exceeded once all the growth within its catchment is delivered by 2038 and a new permit would be required.*' (page 17). However, Table 4-30 of the Greater Norwich Water Cycle Study states '*AWS have confirmed upgrades are planned between 2020 and 2025*'. As such it is currently unclear as to whether the flows associated with the proposed allocation have already been taken into consideration as part of the planned upgrades at Aylsham Water Recycling Centre or not. Clarity is sought on this matter as to confirm whether it is necessary for Policy GNLP0297 for include reference to draft policy criteria 6, as stated above.

The Greater Norwich Water Study states at Table 4-30, in respect of applications submitted from 2020 onwards, "*...developers should contact AWS to confirm flow rates and intended connection points (via a pre-development enquiry) to demonstrate that the WRC can accept the additional flows*".

If it is found that the proposed allocation flows are not included within the planned upgrade works, it is suggested that draft Policy0297 criteria 6 is reworded to state:

"Development proposals at Buxton should have regard to the findings of the Water Cycle Study which indicates potential capacity limitations at the Aylsham Water Recycling Centre'. A Utilities Statement will be required to support the planning application to demonstrate how capacity be made available to serve the site."

It is suggested that this alternative wording better reflects the Planning Practice Guidance contained at paragraph 020 Reference ID: 34-020-20140306 which states "*The preparation of plans should be the focus for ensuring that investment plans of water and sewerage companies align with development needs. If there are concerns arising from a planning application about the capacity of wastewater infrastructure, applicants can be asked to provide information about how the proposed development will be drained and wastewater dealt with...*"

Summary - Strong Support is given to the proposed allocation at Land east of Aylsham Road, Buxton for residential development.

Additional supporting technical documentation is submitted to further demonstrate the suitability of this site for development and provide anticipated timescales regarding delivery at the site.

Specific suggestions are proposed in response to draft policy wording, particularly draft criteria 6. Whilst concern has been expressed about the capacity of Aylsham Water Recycling Centre, clarity is sought on this matter and policy wording to be amended to enable applications for development at the site to set out how relevant utility capacity is to be made available to serve the site.

Policy 2 – Sustainable Communities (Energy Saving) - Object

The proposed policy requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not robustly supported by the Local Plan evidence base. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

The 'Greater Norwich Energy Infrastructure Study' states at para. 5.4.1, that to respond to the aim to 'minimise energy demand of the new development' that: "*New residential ... developments need to meet Part L building regulations relevant at the time of construction ...*" (*emphasis added*). As such this is a proposed local policy requirement which needs to be robustly considered in terms of viability implications for all development which it is to apply.

Policy 5 – Homes (Affordable Housing) - Object

Draft Policy 5 states: "*Major residential development proposals and purpose-built student accommodation will provide:*

- *at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28% ...*"

This policy wording is not considered to be effective by inclusion of the reference "*at least 33% affordable housing*".

In addition the policy wording does not appear to be robustly justified by the support evidence base. It is stated at paragraph 271 that the supporting Strategic Housing Market Assessment 2017 identifies a need for 11,030 affordable homes across Greater Norwich from 2015 to 2038, 28% of the total housing need identified at that point. In addition it is also stated at paragraph 271 that "*The most recent viability study findings... conclude... generally able to provide 28% affordable housing*". Whilst it is noted that the Council has updated its Viability Evidence in December 2020 it doesn't appear to relate to Broadland Village Clusters. In addition I am aware that Broadland Council has been seeking 28% affordable housing in recent S106 agreements based upon the relevant evidence base.

It is requested the policy is amended to state: "*Major residential development proposals will provide 28% affordable housing on-site across the plan area. The Council will negotiate with developers if an accurate viability assessment indicates that this target cannot be met in full.*"

Policy 5 – Homes (Space Standards)

The Pre-Submission Plan does not adequately demonstrate that a policy requirement for all new housing residential development comply with the Nationally Described Space Standards (NDSS) is 'needed'. The fact that some proposals are already providing development which complies with the relevant standards is not sufficient justification. As such, the Plan is not justified, will not be effective, and is not consistent with national policy.

Specific reference to compliance with the NDSS should therefore be removed.

Yours sincerely

Lydia Voyias
Associate Director