

Pigeon Investment Management Ltd: Brundall – 1. Response to Greater Norwich Local Plan GROWTH OPTIONS Questions and 2. Site Specific Comments on Site GNLP0352 (Land North of Brecklands Road, Brundall – 14.67 hectares)-March 2018

1 Growth Options Answers

1. Do you agree with the draft vision and objectives for the plan below?

Pigeon Investment Management Ltd ('Pigeon') generally supports the Plan's Vision and Objectives. However, the Local Plan should acknowledge that achieving the Vision is likely to require a balancing exercise in terms of the objectives. For instance the objective to protect the built and natural environment needs to be balanced with the objective of delivering homes, jobs and infrastructure. This is one of the key Local Plan purposes. The Plan should be a streamlined tool for positively managing and helping to deliver growth, in line with the thrust of National Planning Guidance including the draft NPPF.

2. Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1 to 4.7?

Pigeon acknowledges the NPPF and its most recent proposed revisions which reinforce the importance of the Plan led planning system. The Greater Norwich Local Plan should provide a positive and supportive framework for delivering development and associated infrastructure. Driving economic growth is an essential part of the strategic approach, as is the need to ensure housing is provided of the right type in the right place at the right time. The Plan needs to set out a clear framework, to ensure the area's ambitions are realised. This includes providing the homes and infrastructure to support the City Deal job targets.

Equally important is the Plan's approach to making the best use of, and improve transport and infrastructure networks between strategic employment locations, such as Broadland Business Park/Broadland Gate, Norwich Research Park and nearby population centres and surrounding settlements. The Local Plan needs to ensure that growth is not stifled by overly restrictive planning policies, rather the policies should be positively framed to support the approach to delivering homes, jobs, and infrastructure.

Pigeon support the Local Plan's strategic spatial approach which acknowledges that settlements close to the strategic employment locations and the strategic communications network should be a key focus for housing growth. The transport and infrastructure networks linking strategic employments sites and nearby settlements should also be improved.

In the case of Brundall, the village is ideally located close to strategic employment sites, and the strategic communications network and already provides a wide range of services, facilities and community infrastructure. The village should and can accommodate additional sustainable growth, in the region of 75-100 new homes

3. Which option do you support for jobs growth?

Pigeon considers that the Local Plan needs to have a positive approach to job growth. Norwich is often cited as having the potential to be within the top 10 fastest growing places in the UK in terms

of Gross Value Added (UK Powerhouse Report, Irwin Mitchell and Centre for Economic and Business Research 2017-8).

To realise this potential, the Local Plan should plan for at least Option JT1 (deliver forecast job growth plus additional growth (i.e. the City Deal)). To support this job growth, the Local Plan's should include the additional homes needed to support the City Deal job growth ambitions. The SHMA report (June 2017) suggests that the City Deal housing numbers should not be considered as part of the OAN. Pigeon disagree and suggest that the Local Plan should be taken forward on the basis of the City Deal being delivered, and it does not make sense to exclude the additional homes needed to support the City Deal. To do so would run the risk of the Local Plan being found unsound.

Furthermore, the approach to new homes should not be seen as a ceiling to development, rather it should be considered a minimum requirement.

4. Do you agree that the OAN for 2017-2036 is around 39,000 homes?

Pigeon Investment Management does not agree that the OAN for 2017-2036 is around 39,000 homes. It is too low and does not take into account the need to accommodate the housing required to support the City Deal growth ambitions, or provide for a sufficient delivery buffer. An increased target could take account of opportunities that may be brought about by infrastructure upgrades and improvements.

The SHMA report (June 2017) indicates at Figure 80 that the combined OAN total for Broadland, Norwich and South Norfolk for the period 2015 to 2036 is **36, 486** new homes. However, this excludes the homes needed to support the City Deal and utilises the standardised OAN methodology, which is only a draft at this time. Furthermore, by the time that the Local Plan is adopted, the OAN will be over 3 years old, and based on data/information that is even older.

Pigeon considers that the Greater Norwich OAN should include the City Deal housing numbers, as a key economic objective. Failure to address it properly in the Local Plan and a resultant under delivery of homes could prejudice the ability for Government funding to be secured and runs the risk of the Local Plan being found unsound.

The SHMA report (June 2018) indicates at Figure 96 that the OAN taking into account the City Deal for the period 2015-36 is **44,714** new homes. Additional to this, a delivery buffer should be added. The buffer is needed to provide for potential under delivery and lapsing of both current commitment (35,655 homes as at April 2017) and future commitment.

Pigeon suggests that the OAN is calculated based on what is eventually agreed as the emerging standard methodology in the NPPF, and to include the City Deal requirement and be based on the most up-to-date information available. It is anticipated that to keep the OAN up to date, it will need refreshing at regular intervals up to submission of the Local Plan. If the Local Plan continues to progress on the basis of providing new sites for only 7,200 new homes, effectively not providing sufficient sites to support the City Deal, it would not provide a sufficiently robust and flexible strategy to deliver the Plan's Vision and objectives, and would therefore runs the risk of being found be unsound.

5. Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?

Pigeon suggests that the plan should provide for a **15%** delivery buffer and allocate sites for at least **15,750** new homes to take account of the City Deal, growth opportunities brought about by infrastructure upgrades (para 4.30 of the Growth Options document) under delivery of current and future commitment, potential changes in the OAN baseline (such as household projection changes) and to help ensure affordable housing delivery targets are met, on the basis that it is unlikely that all sites will be able to meet the affordable housing percentage requirement due to viability etc.

If the Local Plan continues to progress on the basis of providing new sites for 7,200 homes, effectively ignoring the need to provide sites to support the City Deal, it would not provide a sufficiently robust and flexible strategy to deliver the Plan's ambitions, and would therefore run the risk of being found unsound.

6. Do you agree that windfall development should be in addition to the 7,200 homes?

Pigeon agree that the windfall development figure should be dealt with as an addition to the housing requirement, not included as part of it, given its unpredictable nature and lack of certainty.

7. Are there any infrastructure requirements needed to support the overall scale of growth?

Pigeon acknowledge that the scale of growth that is already committed in Greater Norwich requires a considerable amount of infrastructure upgrades and new infrastructure to deliver it. Additional growth will require further upgrades, particularly on the strategic road and rail network. It is suggested that planned upgrades to take account of already committed development should also take account of the potential for the additional growth needed to 2036.

8. Is there any evidence that the existing housing commitment will not be delivered by 2036?

Pigeon suggest that there will be a series of economic cycles during the lifetime of the Plan and it is not possible to know what the likely impact on delivery of the existing housing commitment will be. The ability of the public sector to unlock development by providing up front loans and grants particularly for infrastructure, as a way of 'smoothing' development cash flow will certainly help the delivery of committed sites. Additionally, where commitment requires access rights over railways or railway land or other third parties are involved, the negotiations to obtain the necessary rights can be protracted, and potentially costly. The Local Authority should have a role in helping to overcome and speed up such negotiations.

9. Which alternative or alternatives do you favour?

Pigeon do not identify a preference for a particular Option at this early stage of the plan process, particularly taking into account the response to questions 3, 4 & 5, proposing an uplift to the number of homes and jobs required through the Local Plan process. Pigeon consider that the three top tiers of the hierarchy should be the focus for growth.

10. Do you know of any infrastructure constraints associated with any of the growth options?

None, which are not already known, understood or accepted (based on the information available)

11. Are there any other strategic growth options that should be considered?

Pigeon has not identified a particular strategic growth option at this stage and consistent with the response to question 9, would raise concerns about defining a particular option at this stage of the plan and in the context of the comments made in relation to the overall housing and job numbers. As the plan develops, the strategy may well be an amalgam of the options but Pigeon consider that the three top tiers of the hierarchy should be the focus for growth.

12. Do you support the long term development of a new settlement or settlements?

Pigeon do not support the development of a new settlement or settlements. The draft NPPF and the thrust of current Government guidance is around housing delivery. New settlements have inherent challenges in terms of the timescale for their delivery and the requirement for significant levels of infrastructure. This has already been seen within the Greater Norwich area with the slow rate of delivery at Rackheath, which has been many years in its inception. The HELAA document also includes a significant number of sites available and deemed suitable in principle to meet the housing demand set out above, without requiring the provision of a new settlement.

13. Do you support the establishment of a Green Belt? If you do, what are the relevant “exceptional circumstances”, which areas should be included and which areas should be identified for growth up to and beyond 2036?

Pigeon do not support the establishment of a Green Belt. Doing so would be unresponsive to changing needs and potentially prejudice the ability to deliver sustainable development.

14. Should the area defined as the city centre be extended?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

15. Do you support the approach to strategic planning for the city centre in 4.80 above?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

16. What should the plan do to reduce office losses and promote new office development in the city centre?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

17. What should the plan do to promote retailing in the city centre?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

18. Should the focus for late night activities remain at Riverside, Prince of Wales Road and Tombland or should a more flexible approach be taken?

Pigeon does not wish to comment further on this matter at this stage but reserve the right to do so at later stages if necessary.

19. What should the plan do to promote housing development in the city centre?

Pigeon are of the opinion that work should be undertaken to deliver existing allocations within Norwich City Centre identified within the previous JCS and accompanying site specific documents. Given the current consultation is for an extension of the JCS through to 2036, it would not be appropriate to allocated additional city centre sites when there have been challenges with the delivery of existing allocations. A significant review should be undertaken of those sites that have not delivered new homes before allocating additional sites, particularly as these are likely to have been the more obvious options for city centre development and there is a finite source of appropriate city centre sites within the city boundaries. This should include consideration of site allocations where there are existing uses on site, the housing market, with an emphasis on higher density development in such locations as well as the challenges of bringing forward mixed use allocations. With a specific focus on housing delivery, the allocation of more challenging city centre sites should be carefully considered in this context.

20. How can the plan best support cultural, visitor and educational uses in the city centre?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

21. Do you support Option UA1 for the remainder of the urban area and the fringe parishes?

Pigeon do not wish to comment on this matter at this stage with regard to Brundall , but reserve the right to do so at later stages if necessary.

22. Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

23. Do you agree with the approach to the top three tiers of the hierarchy?

Pigeon consider that the top three tiers of the hierarchy (Norwich Urban Area, Main Towns and Key Service Centres) are correctly identified and should be the focus for growth.

24. Do you favour option SH1, and are the villages shown in appendix 3 correctly placed?

Pigeon consider that option SH1 with the top three tiers of the hierarchy (Norwich Urban Area, Main Towns and Key Service Centres) accommodating a significant level of growth is an appropriate option. Pigeon do not wish to comment on the smaller villages in Appendix 3 at this stage, but reserve the right to do so at later stages if necessary.

25. Do you favour the Village Group approach in option SH2? And

a) What criteria should be used to define groups?

b) Which specific villages could form groups?

c) How could growth be allocated between villages within a group?

Pigeon does not wish to comment on the smaller villages, groups and criteria etc. at this stage, but reserve the right to do so at later stages if necessary.

26. Do you support a Norwich centred policy area and, if so, why and on what boundaries?

Pigeon consider that the influence of Norwich is substantial and that a Norwich centred policy area could still be appropriate. However, more detail on its extent and the policies that would be applied is needed before a firm conclusion can be made and we would repeat our earlier comments that the focus for development should be the top three tiers of the hierarchy.

27. Which option or options do you support?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

28. Which allocated or existing employment sites should be identified as strategic sites and protected?

Pigeon identify that there is a focus of employment and tourism activity around the Broads and the boating industry in the southern part of the village and that this should be protected to continue to provide local employment opportunities.

29. Are there employment areas that should be identified as suitable for release for residential uses?

Pigeon would not consider that there are employment areas suitable for release for residential use as set out in the response to question 28 above. The Broads location, flood risk and accessibility would preclude the release of this land for residential purposes.

30. Are there any new employment sites that should be allocated?

Pigeon do not wish to comment on this matter at this stage with regard to Brundall, but reserve the right to do so at later stages if necessary.

31. Should the position of any of the centres in the retail hierarchy be changed?

Pigeon does not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

32. Do any of the existing retail centres have scope to expand to accommodate further floorspace?

Pigeon does not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

33. What measures could the GNLP introduce to boost the rural economy?

Pigeon suggest that delivering allocations in key service centres in rural areas will help boost the rural economy, by providing opportunities for local builders and related tradespeople to work. New residents will also help support local services and facilities. Improving connectivity, through improved transport links and services and better broadband and mobile coverage would also help boost the rural economy.

34. Are there any other specific strategic transport improvements the GNLP should support?

Pigeon suggests that the GNLP should seek to improve junctions in the A47(T) at Brundall, and also bus/rail facilities and frequencies at Brundall.

35. Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area?

Pigeon suggest that the GNLP could include more flexible general policies for permitting telecommunications equipment, and identify telecommunications 'not spots' at which even more flexible policies for telecommunications equipment would apply. Site proposals that offer new opportunities for public walking/cycling routes and recreational opportunities through the provision of open space should be encouraged.

36. Which approach do you support for promoting good design of new development?

Pigeon consider that of the two options, Option DE 1, the 'business as usual'/current approach to design is more appropriate than a more prescriptive approach to design and density, although there should be greater flexibility to provide for high density development in appropriate locations, for instance to reflect local character or to maximise opportunities for sustainable travel, close to public transport interchanges

37. Which approach to affordable housing thresholds do you prefer?

Pigeon consider that of the two options, Option AH2, the Government/Ministerial Written Statement consistent approach to thresholds is preferred.

38. Which approach do you favour for affordable housing percentages?

Pigeon consider that of the three options, Option AH3 (27% affordable) is the preferred, provided that the policy was flexible enough to take account of site viability, phasing, and changes in housing need.

39. Do you support the favoured option for tenure split?

Pigeon suggest that the policy should be seen as a starting point, and that it should retain a degree of flexibility for affordable housing tenures to be changed to reflect local need and to help viability and delivery. The draft NPPF references a range of tenure choices and there should be flexibility at the point of delivery, reflecting need at that time.

40. Which approach do you think should be taken to rural windfall and exceptions sites?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

41. Which approach to the mix of housing do you support?

Pigeon does not support either option and suggest that it is inappropriate for the Local Plan to seek to set a preferred housing mix to be applied to development. This should be left to the market to decide which would be far more flexible and responsive to actual demand and should reflect a design-led approach to development.

42. Which approach or approaches to housing for older people and care accommodation do you favour?

Pigeon consider that out of the two options, Option AH11, to enable residential care accommodation uses to be appropriate on any allocated housing sites, subject to a criteria-based policy is the preferred option, the policy could include provision for assisting living and other forms of specialist residential care.

43. Which of the reasonable alternatives for houseboats do you favour?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

44. Which policy approach do you favour to planning for the needs of Gypsies and Travellers?

Pigeon support the policy set out at GT1 for the provision of new sites or extensions to existing.

45. Are there any suitable sites for Gypsy and Traveller accommodation you wish to submit?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

46. Do you support the favoured option for planning for the needs of Travelling Showpeople?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

47. Are there any suitable sites for Travelling Showpeople accommodation you wish to submit?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

48. Do you support the favoured option for residential caravans and park homes?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

49. Are there any potential locations for new/expanded residential caravans sites that you wish to propose?

Pigeon do not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

50. Do you support the favoured option for climate change policy?

Pigeon consider that the building regulations regime, NPPF and PPG set a good standard for climate change that does not need to be duplicated within the Local Plan. However, policies should recognise the ability to step beyond these requirements to address bespoke issues of the Local Area.

51. Which approach do you favour for air quality?

Pigeon consider that the Local Plan should not include an air quality policy as it would add to duplication of existing provisions and potentially lead to confusion and conflicts.

52. Do you support the favoured option for flood risk policy?

Pigeon consider that the Local Plan should not include a policy on Flood Risk as this is adequately dealt with in the NPPF and PPG.

53. Which option do you support?

Pigeon consider that the Local Plan should combine the two approaches for provision of green space to offset/mitigate impact on designated nature conservation sites. The Local Plan should enable the application of both approaches, for instance development should include on-site provision, or if this is not favoured offer an off-site/in lieu payment instead of on site provision. Fundamentally the approach should encourage a package of measures to be brought forward to deliver nature conservation and green infrastructure.

54. Do you think any changes should be made to the Green Infrastructure network?

Pigeon are not suggesting specific changes to the Green Infrastructure Network but considers that the Local Plan should look favourably on-site promotions that offer opportunities to improve to the Green Infrastructure network.

55. Which of these options do you favour?

Pigeon consider that out of the two options, Option LA2, which is to retain the general current approach to landscape protection in the current three local plans is preferred.

56. Should the GNLP protect additional Strategic Gaps and if so where should these be?

Pigeon are not aware of any additional strategic gaps that should be designated, but reserve the right to comment further at later stages if necessary. Acknowledgement that the current gaps do not completely prohibit development are welcomed and they should be subject to on-going review as to their appropriateness and effectiveness.

57. Should option EN1 be included in the GNLP?

Pigeon consider that the Local Plan should not include a 'Merton Type' policy and again suggest that the building regulations regime, NPPF and PPG set a good standard for climate change that does not need to be duplicated within the Local Plan. However, policies should recognise the ability to step beyond these requirements to address bespoke issues of the Local Area There are sufficient provisions included within building regulations, the NPPF and the PPG.

58. Do you support option W1?

Pigeon consider that the Local Plan should only include a water efficiency policy requirement if there are insufficient provisions included within building regulations, the NPPF and PPG. However, the need to be mindful of water usage in the Greater Norwich area is understood.

59. Do you support option COM1 for the distribution of affordable housing?

Pigeon suggest that the policy for distributing affordable housing across development sites should have a degree of flexibility to allow provision of appropriate sized clusters of affordable housing to allow for efficient management; and to take account of flats and apartment blocks, where mixed tenure buildings may be difficult to manage. The approach to site layout including affordable housing should be design-led and accordingly any policy should not be overly prescriptive or inflexible as to inappropriately influence a scheme's design.

60. Which option do you support?

Pigeon consider that matters such as Health Impact Assessments and other supporting information should not be subject to a blanket policy but should be specific to allocations. This could be determined through the allocation or dealt with at the planning application and validation stage.

61. Do you support option NP1? If so, which GNLP policies should be "strategic"?

Pigeon acknowledge the aspiration within the plan in identifying strategic policies in line with the 'basic conditions' test but would reserve the right to comment further following production of a final policy and/or list of policies. The approach and interpretation of this policy should be flexible recognising that Neighbourhood Plans can depart from the Local Plan where there is a reasonable justification, and also the spirit of Neighbourhood Plans, which should be different, distinct and reflect the particular circumstances of their Neighbourhood Plan area.

62. Which option do you support?

Pigeon considers that the Local Plan should pursue Option CUL3 and not include a separate policy on Culture, rather provisions should be included within other aspects of the plan. The approach to protecting cultural assets can also be achieved through community action such as the designation of community assets.

63. Do you support option BR1?

Pigeon consider that a specific policy covering development proposals close to the Broads is not necessary. Such considerations should be included within other relevant policies and allocations, and could potentially be included as a criterion against which proposals will be considered.

64. Are there any current indicators that should be excluded or included in the GNLP monitoring framework?

Pigeon do not wish to make specific comments on this matter at this stage, but reserve the right to do so at later stages if necessary. However, the focus of the monitoring framework should be on delivery, for example housing delivery, consistent with the draft NPPF.

65. Which option do you support?

Pigeon consider that a policy that seeks to control which sites could come forward in the event of a failure to maintain a 5-year housing supply is inappropriate and contrary to the NPPF. A criteria-based approach should be set out to meeting any identified shortfall.

66. Are there any other issues relating to the GNLN you would like to raise?

Pigeon has no further issues that we wish to raise at this stage.

2. Site Specific Comments on Site GNLN0352 (Land North of Brecklands Road – 14.67 hectares)

Pigeon has reviewed and considered the Settlement Site Summary for Brundall and also the Housing and Economic Land Availability Assessment (HELAA) summary for Site GNLN0352. Pigeon wish to make the following comments.

Brundall Settlement Summary

The Summary's acknowledgement that Site GNLN 0352 (Land North of Brecklands Road) is one of a range of site options available to accommodate new homes is supported. As detailed further within the response to the HEELA below, the Concept Plan (drawing no. 0077/005) submitted with these representations defines a design and landscape-led approach that is sensitive to the landscape and existing built form of Brundall as well as a maintaining a strong separation of built form from Run Dike and its ecology, through the provision of a Country Park along the northern and eastern boundary. This comprises a significant ecological and community benefit in a location where there is a long-standing deficit in open and recreational space, which has not been addressed through the allocations in the previous JCS. It also satisfactorily addresses any flood risk concerns with the area of flood risk limited to the extreme margins of the site at Witton Run, at a considerable distance from any new homes.

The Pigeon scheme provides a strong and distinct alternative to the other sites that are being promoted. The concept masterplan is based on a scheme of around 75 new homes, which would be of a more appropriate scale for the village and would have a limited impact upon the local highway network, with 2 points of access and a looped internal road arrangement. The scheme would include self-build plots, bungalows and also has the potential for assisted living, as well as abundant open space and enhanced connections to the local footpath network. The open space provision and enhanced landscaping will see a net gain in biodiversity with the land currently in arable production.

HELAA Site Suitability Assessment (GNLN0352)

In respect of the Site Suitability analysis, the conclusion that the site is suitable for new homes is welcomed and as set out above, the Pigeon scheme is for a high quality landscape and design led proposal of a scale and form that is entirely appropriate for the village of Brundall and the particular nature of the location, with a range of community benefits.

Addressing the Constraints and Impacts Analysis in detail, we are pleased to see the site score a 'green' rating for the following matters:-

- Accessibility to Services;
- Utilities Infrastructure;
- Contamination and Ground Stability;

- Market Attractiveness;
- Biodiversity and Geodiversity;
- Open Space and GI.

Pigeon support the above findings and would add that the scheme will see a significant enhancement of open space and green infrastructure through the provision of a country park, with enhanced access to Witton Run and the local footpath network in accordance with the aspirations of the Brundall Neighbourhood Plan. The open space, together with enhanced boundary planting also has the potential to deliver a net gain in biodiversity with the site currently in arable production with biodiversity largely restricted to the field margins.

The site and location scores well in terms of market attractiveness and provides a distinct offering to sites that are being promoted elsewhere in the village. This includes the provision of bungalows, largely along the southern and western boundaries to be in keeping with the existing built form in this part of Brundall as well as providing an appropriate scale of development in relation to these properties. This will limit impacts upon residential amenity together with landscaping enhancements and the provision of open space at the site entrance.

The 'red' rating applied to flood risk is not applicable to this site and the scheme shown on the submitted Concept Masterplan would not be precluded on flood risk grounds. Flood risk matters are restricted to Witton Run at the extreme northern and eastern boundaries of the site which are proposed for a Country Park and the proposed new homes would not be impacted upon, and indeed would be a significant distance from the flood zone.

Access is defined as amber but the conclusions define that the site is suitable for the provision of new homes and confirms that any constraints could be overcome through development as well as that any impact on the functioning of local roads could be mitigated. The scheme has been developed with access from both Brecklands Road and The Coingncroft and a looped main distribution road through the site between the two. The scale of the scheme and nature of the access provision ensures any highways impact is minimal and both access roads benefit from good visibility onto Strumpshaw Road.

With specific reference to townscape and landscape, the Concept Masterplan sets out a high quality, landscape led approach to ensure a sensitive design approach. The concepts have been informed by landscape appraisal establishing a number of principles for the scheme. This includes linear street patterns reflecting the existing character of built form to the south and west, with the new homes not extending further to the east and north than existing homes in the village. Accordingly, the scheme will be seen within the context of existing homes to the south and west and will not encroach any further into the river valley. This approach is further enhanced by the properties on the outer edge of the development being comprised of self-build homes, at a low density in a landscaped setting on the edge of the Country Park. This comprises a soft transition on the edge of Brundall and will provide an enhancement to the existing hard edge respecting views from the wider landscape as well as the setting of a number of churches on the opposite side of the valley.

It is intended that the density of development will be comparable to the existing properties on the eastern edge of Brundall and the provision of bungalows, landscaping and open space along the southern and western boundaries of the site will minimise any impact from the allocation of this

site. Further to discussions with Brundall Parish Council, the potential for assisted living as part of the scheme's mix is also being explored.

Finally picking up some of the further comments within the site suitability conclusions, reference is made to the Broads National Park but this is on the southern side of Brundall and the site is separated by the village so that allocation of this site would not have an impact. It is understood that the sewage works is to the south-east of the site but no odour issues have been identified, prevailing winds are south-westerly, other parts of the village lie between the site and the treatment works and from experience with similar small treatment works in other locations, the site is sufficiently distant that no issues would be raised by statutory consultees.

In summary, the Concept Proposals demonstrate a high quality, landscape-led development that is sensitive to the location and with no constraints that would prevent the delivery of new homes. In short, the scheme comprises sustainable development, with a range of community benefits including a country park and enhanced footpath and cycle links and is wholly appropriate for allocation.

