

Pigeon Investment Management Ltd: Reepham– 1. Response to Greater Norwich Local Plan GROWTH OPTIONS Questions and 2. Site Specific Comments on Site GNLP0353 (Land north and south of the B1145 Dereham Road, Reepham – 11.67 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 Local Plan's key 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 acknowledge 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.

Whilst 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 role of towns such as Reepham, at a greater distance from Norwich also need to be recognised where they have a wide sphere of influence in the Local Area and are an important destination from lower order settlements for jobs, education, shopping etc. The Local Plan should acknowledge that higher order rural settlements such as Reepham, provide opportunities for sustainable development, and should include appropriate sized allocations to help them maintain their position as service centres serving a wider rural hinterland.

The Local Plan should acknowledge that the rural areas are an important source of employment opportunities. Where appropriate, schemes proposing employment uses in rural areas should be encouraged. Pigeon's proposals for Reepham include an Employment allocation of approximately 4 acres / 1.6ha. This has been identified working with a particular end-user, who is a significant employer within the local area and is looking to expand their existing operation. In addition the proposals include reserved land to permit expansion of the doctor's surgery to future-proof healthcare demand going forward including the provision of additional services not currently provided by the surgery.

3. Which option do you support for jobs growth?

Pigeon considers that the Local Plan needs to have an ambitious 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 should take an ambitious approach to identifying sites for new homes, and the OAN 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 Investment Management disagree and suggest that if the Local Plan is taken forward on the basis of the City Deal being delivered, 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.

The potential of job growth in rural areas should not be underestimated. The Local Plan should provide a positive framework to allow for job growth and creation in villages and towns such as Reepham, including allocating small-scale employment areas in rural areas and providing support for rural business by encouraging better broadband and telecommunication provision in rural areas. Development in rural areas including new housing can help to facilitate improvements to Broadband

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 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. Neither is it ambitious enough to take account of opportunities that may be brought about by infrastructure upgrades and improvements. It also limits the opportunity for rural areas to grow by placing an artificial cap on housing numbers. The SHMA (2017) acknowledges that the Norwich Housing Market stretches beyond the NPA, and into the rural areas. The rural areas can provide for a significant number of homes to support the City Deal job growth ambitions as well as their important role in serving their rural hinterland.

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 2017) 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 only 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.

Pigeon suggest that permitting growth in locations such as Reepham may allow for more development to come forward within existing capacity limits, or in areas where the upgrades are more affordable/easy to deliver. However this should be restricted to locations such as Reepham which play an important role in serving their rural hinterland.

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. However 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, by directing development further away from Norwich and the strategic employment sites. The success of delivery within Greater Norwich has been achieved without the need of a Green Belt

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 Reepham, 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 Investment Management does 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 consider that provided option SH2 maintains the top three tiers of the hierarchy (Norwich Urban Area, Main Towns and Key Service Centres) accommodating a significant level of growth, then SH2 could be an appropriate option. 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 consider that Reepham does not contain any employment allocations that could be considered as strategic sites.

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.

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

IN respect of Reepham and as detailed further within Part 2 of these representations on site specific matters, the site that is being promoted by Pigeon has been updated since the original call for sites submission and now includes approximately 4 acres / 1.6ha of employment provision on the northern side of Dereham Road, Reepham as well as land reserved for the expansion of the Doctor's Surgery as part of a mixed -use proposal. The commercial use is being promoted for an identified local business with an aspiration to expand their successful current operations, making it highly suitable for an employment allocation as part of an overall mixed-use allocation.

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 has not identified any specific strategic transport improvements in relation to Reepham.

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 considers 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 considers 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 suggests 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 Investment Management does 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 housing delivery, consistent with the draft NPPF.

65. Which option do you support?

Pigeon considers 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 GNLP you would like to raise?

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

2. Site Specific Comments on Site GNLP0353 (Land north and south of the B1145 Dereham Road, Reepham – 11.67 hectares)-

It is important to clarify that the proposals for Site GNLP0353 have been updated subsequent to the call for sites submission in Summer 2016. The land north and south of Dereham Road is being promoted as a mixed-use scheme comprising the following elements:-

- Residential development of approximately 120 new homes across the northern and southern land parcels with the mix likely to include a proportion of bungalows and the potential for self-build plots;
- Employment allocation of approximately 4 acres / 1.6ha. This has been identified working with a particular end-user, who is a significant employer within the local area and is looking to expand their existing operation; and
- Reserved land to permit expansion of the doctor's surgery to future-proof healthcare demand going forward including the provision of additional services not currently provided by the surgery.

Drawing Number 0078/102 has been included within the representations and defines the proposed employment allocation together with a potential expansion of the GP Surgery site, with a new access onto Dereham Road, Reepham. The remainder of the land has the potential for residential development and with 2 parcels, there is a flexibility to meeting the need ultimately identified for Reepham. Based on the previous JCS allocation, which has yet to come forward, it is suggested this should be in the region of 120 new dwellings.

Pigeon has reviewed and considered the Settlement Site Summary for Reepham and also the Housing and Economic Land Availability Assessment (HELAA) summary for Site GNLP0353. Pigeon wish to make the following comments.

Reepham Settlement Summary

The Summary's acknowledgement that Site GNLP 0353 (Land north and south of the B1145 Dereham Road) is one of a range of site options available to accommodate development is supported. The recognition of the flexibility around the 2 parcels of land is also welcomed although Pigeon would contend that this flexibility would also permit smaller growth to be accommodated on GNLP0353. However, notwithstanding its Key Service Centre status, Reepham itself is a town with a range of services and facilities including a High School, and has a significant sphere of influence within the local area. Accordingly, we would suggest it is allocated for a level of growth of around 100-120 dwellings consistent with the previous JCS, and particularly as that site has yet to come forward. On that theme, the recognition that development of the southern parcel could facilitate the delivery of the existing allocation (including its provision for the High School) is welcomed.

Comments relating to surface water flood issues are noted but from preliminary investigations we are unaware of any issues. However, the position could be enhanced by sustainable drainage proposals. We would also concur that there is sufficient land for any issues to be avoided or mitigated and similarly there is sufficient land to avoid impacts on the Conservation Area, which would certainly not preclude development, given Pigeon's commitment to high quality, landscape led development.

HELAA Site Suitability Assessment (GNLP0353)

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 town of Reepham.

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

- Access
- Accessibility to Services;
- Utilities Infrastructure;
- Contamination and Ground Stability;
- Market Attractiveness;
- Significant Landscapes
- Biodiversity and Geodiversity;
- Open Space and GI; and
- Compatibility with Neighbouring Uses

Pigeon support the above findings and would emphasise that the site lies within a highly sustainable location with easy access to the town centre and the range of services and facilities contained within it. Indeed, the delivery of new commercial development, including potential expansion of the doctor's surgery on the site will continue to support the town centre and its shops and services in addition to the new homes.

The site is not within a Flood Risk Zone and as detailed above, there is sufficient land to address or avoid surface water drainage issues, with the potential to deliver enhancements through suitable SuDS design.

With regards to townscape and heritage, it is noted that the Reepham Conservation Area extends close to the south-eastern corner of the northern parcel. However, the northern parcel is a well-contained site with strong boundary treatments and therefore any impact upon the townscape and Conservation Area is minimal. In addition, the land in the south-western corner is proposed for potential expansion of the surgery which will limit any potential impact.

The southern parcel similarly has a limited townscape impact and adjoins the existing allocation from the JCS.

With regard to transport and roads, the site is given an amber rating although access raises no concerns and the site suitability conclusions define that any impact on the local roads could be mitigated and this wouldn't prevent development of the site.

In summary, the concept proposals define a high quality, landscape led development that would be delivering a mix of new homes and employment in a highly sustainable location with minimal constraints and certainly none that could not be overcome. It therefore comprises a suitable site for

a mixed use allocation with a range of benefits including local employment in a sustainable location and future-proofing the needs of the local doctor's surgery.