BIDWELLS

GNLP Regulation 18 Consultation Response

GNLP 0132 - Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston

On behalf of a consortium of developers formed of Persimmon Homes, Hopkins Homes and Taylor Wimpey (hereafter referred to as 'the Consortium'), we strongly recommend that site GNLP 0132 should be allocated for residential development, comprising approximately 1350 dwellings, with associated open space and infrastructure including a primary school. The site is considered to be entirely developable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2036, as set out in the accompanying Vision and Delivery Document, which draws on technical evidence prepared in support of this Representation.

In accordance with the National Planning Policy Framework's (NPPF) definition of 'developable', set out in footnote 12 to paragraph 47, the site represents a suitable location for housing development, and there is a reasonable prospect that the site is available and development could begin within 8-12 years. These points are addressed in further detail below, and within the Vision and Delivery Document that accompanies this Representation.

Assessment of Developability

Suitable

The site is located within Sprowston, one of the fringe parishes identified in Policy 9 of the Joint Core Strategy, and is also within the Broadland Growth Triangle, an important location for growth within Greater Norwich. The Joint Core Strategy identifies the Growth Triangle as a key focus for sustainable development, due to its easy access to strategic employment opportunities, particularly at Broadland Business Park and Norwich Airport Industrial Estate, as well as local employment at Rackheath and Salhouse Road, the opportunities it provides for high quality public transport links into Norwich City Centre, and its good relationship to existing services and facilities in the Norwich fringe. It is evident, therefore, that Sprowston is a suitable location for further growth, based on current policy, and that this site can accommodate a significant proportion of the growth planned for Norwich and the fringe parishes in the period to 2036, in 3 of the 6 potential growth options.

Whilst the site is currently detached from the built form of Sprowston, it is immediately adjacent to existing allocations - GT20 to the west, and GT7 to the south. It will ultimately, therefore, be immediately adjacent to residential development to the west and south and consequently represents a logical extension to the planned growth in this area, and would create a clear and defensible boundary to the edge of the urban area of Norwich.

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 access, accessibility to services, utilities capacity, utilities infrastructure, market attractiveness, townscapes, historic environment 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, which include

contamination and ground stability, flood risk, significant landscapes, biodiversity and geodiversity, open space and green infrastructure and transport and roads are addressed in more detail below.

Significant Landscapes

The majority of the site is situated on the Norwich side of the identified landscape buffer within the Growth Triangle Area Action Plan, whose purpose is to provide the landscape setting to the future built edge of Norwich, ensuring separation between the edge of the Norwich urban area and adjacent villages. Only a small parcel of land in the south-eastern corner of the subject site encroaches into the designated landscape buffer; this is an area of Ancient Woodland, known as Bulmer Coppice, which would be retained in its entirety as part of any development, as demonstrated on the indicative Masterplans contained within the Vision and Delivery Document. Development in this location will, therefore, ensure that the important elements of the landscape structure of the area, such as Bulmer Coppice are maintained, and built development will not erode the identified landscape buffer.

The Vision and Delivery Document includes a Visual Assessment and establishes a Zone of Theoretical Visibility. This establishes that the site is visible from a relatively confined area, with views primarily from areas to the west and south. The retention of existing landscape features, together with the proposed additional planting, should result in minimal landscape and visual impacts.

Biodiversity and Geodiversity

Retention and enhancement of the existing landscape framework in and around the site will also assist in ensuring that there are no adverse impacts on biodiversity. Bat Corridors will be retained and/or created, in accordance with the existing Area Action Plan, and existing areas of high quality foraging habitat, such as the eastern boundary and the north-western and northern hedgerows, will be retained and kept suitable for foraging with minimal lighting and screening as necessary. There is scope to provide a substantial area of new, higher quality foraging habitat to mitigate the loss of existing low-quality foraging habitat from the centre of the site. Bulmer Coppice can also be substantially enhanced as a foraging habitat.

The Ecological Appraisal and Strategic Assessment undertaken by Hopkins Ecology in support of this Representation, confirms that Great Crested Newts were not recorded on site, and the closest breeding pond is over 300m to the east. Consequently, the erection of exclusion fencing along the eastern boundary of the site to prevent colonisation once farming ceases, should ensure that the site remains free of Great Crested Newts. Full assessments for a range of species including breeding birds and reptiles will be undertaken in advance of submitting any planning application, and will ensure that any development has no adverse impacts on Protected Species.

The impact of additional numbers of residents and the potential for recreational disturbance to The Broads and its international sites will be managed through the provision of on-site mitigation as an integral part of the development. Provision of on-site greenspace with walking routes that are attractive to local residents, particularly dog walkers, will assist in preventing any increased pressure on The Broads. This approach has been accepted on the first phase of the White House Farm development.

Transport and Roads

Vehicular access to the site would be achieved principally from Salhouse Road, with a secondary access from the adjacent existing spine road, Mallard Way. These accesses would provide safe, effective, vehicular access and egress in accordance with current highway design standards. Work undertaken by Richard Jackson Engineering Consultants in support of this Representation demonstrates that development of the site would not have any severe impact on junctions located to the south-west of the

site (towards the city) and traffic can be accommodated on the local road network once the Northern Distributor Road (NDR) is fully operational, which is programmed for Easter 2018.

The site enjoys easy access to the planned Bus Rapid Transit Corridor on Salhouse Road, and it is envisaged that either an existing bus service could be diverted into the site, or a new service provided along Salhouse Road to serve the development. The site will also benefit from connections into the existing cycle route network, which provides access to various destinations in the City Centre, including the Railway Station.

Flood Risk

The HELAA identifies that small sections of the site are at low risk of surface water flooding. A report undertaken by Richard Jackson Engineering Consultants in August 2017, and submitted in support of this Representation, demonstrates that there are minimal risks of existing natural surface water flooding of the site. The Ground Investigations undertaken on the nearby land within Phase 1 of White House Farm have shown that the ground is likely to be suitable for infiltration drainage techniques. There is sufficient space within the site to incorporate all necessary SuDS requirements, and consequently there is negligible risk to the site or others in the local area.

Contamination and Land Stability

The Site Proposals consultation document refers to the need to consider mitigation for nearby filled ground. A Preliminary Geo-Environmental Risk Assessment has been prepared by Delta Simons in support of this Representation. This confirms that there are limited potential sources of contamination, which comprise the agricultural use of the site, potential localised Made Ground deposits and an historic gravel pit and landfill located to the east of the site. There is considered to be a low to moderate risk of soil/groundwater contamination and hazardous ground gas at the site. Any risks can be alleviated through intrusive investigation, and the implementation of suitable mitigation measures as appropriate.

Summary

In conclusion, therefore, it is clear from the above that the site is entirely suitable for residential and associated development. The technical evidence submitted alongside this Representation, together with the Vision and Delivery Document, demonstrates that there are no constraints to the delivery of the site.

Available

The site is currently in agricultural use, and is under option to the White House Farm Developer Consortium of Persimmon Homes, Hopkins Homes and Taylor Wimpey. It is anticipated that it would become available for development in 8-12 years i.e. between 2026 and 2030, following completion of the development of the existing allocation adjacent (GT20).

The Consortium are committed to the delivery of the site, and have a proven track-record of delivering housing in the area. The rate of delivery for the first phase of development at White House Farm has been 150 dwellings per year since 2014 (affordable and market) with all three consortium members delivering a consistent supply.

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, as well as the provision of strategic landscaping, the potential requirement for a primary school, and infrastructure upgrades/reinforcement.

Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary at subsequent stages of the process.

Summary

As outlined above, the site is suitable, available and viable, and is therefore developable. Development in this location would represent sustainable development, as defined within the National Planning Policy Framework. Sprowston, as one of the Norwich Fringe Parishes and within the Growth Triangle, is already acknowledged as a highly sustainable location, and a preferred location for growth. The foregoing text demonstrates that this specific site is a suitable location for further development in all respects.

Economically, the site represents the right land in the right place at the right time. Residential development here in the period 2026-2030 and beyond would help support the planned long-term economic growth of the Greater Norwich Area, particularly in the strategic employment locations such as the Norwich Airport area and Broadland Business Park/Broadland Gate. |This would provide high-quality and desirable homes within easy reach of these key employment areas.

Socially, the scale of development envisaged is such that it will enable the creation of a strong, vibrant and healthy community, with easy access to existing and planned local services and facilities, as well as on-site provision of a primary school and extensive Green Infrastructure. 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 on the north-eastern edge of Norwich, which should assist in achieving social integration between the existing and new residents.

Environmentally, the site is located close to a wide range of employment opportunities, and enjoys excellent access to a range of sustainable transport options providing easy access to the extensive array of facilities and services available within Norwich city centre. Development in this location will assist in further enhancing the sustainable transport options available in the area, including the aspiration to create a Bus Rapid Transport corridor along Salhouse Road. 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 a significant contribution to the planned growth of Norwich in the period to 2036.