

# GNLP Regulation 18 Consultation Response

## GNLP0419 – Land at Holly/Reepham Road, Glebe Farm ‘South’

On behalf of our client, Mrs Rachel Foley, we strongly recommend that land at Glebe Farm ‘South’ is allocated for a mixed-use development comprising a variety of employment, leisure, retail, education and residential uses. The site is considered to be entirely deliverable, and capable of making a significant contribution towards satisfying the Councils’ growth forecasts during the period to 2036.

Whilst the National Planning Policy Framework (NPPF) states that when drawing up Local Plans, local planning authorities should, amongst other things:

- Identify sites for local inward investment to match the economic strategy and meet anticipated needs over the plan period;
- Support existing business sectors, and where possible identify and plan for new or emerging sectors likely to locate in an area; and
- Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries.

It contains no specific guidance on what is considered to be a ‘deliverable’ site in terms of non-residential uses. Accordingly, the definition of ‘deliverable’, set out in footnote 11 to paragraph 47, is used for the purposes of this representation to demonstrate that the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on it, and is viable.

### Assessment of Deliverability

#### *Suitable*

The site falls within the parish boundary of Horsford, but is located equidistant between the settlements of Drayton and Horsford. The two settlements are divided by the recently completed Norwich Distributor Road (NDR); with the site falling on the Drayton side of the new road. The site is immediately adjacent to the NDR and the interchange between the NDR and Drayton Lane, the NDR and the A140. The site is approximately 1.11km from the Settlement Boundaries of Drayton and 732.04m from Horsford. Norwich Airport and the associated Employment Area is located approximately 2.06km from the site.

Horsford is identified as a Key Service Village, which is recognised as a location that could support future growth. The site is also in close proximity to Drayton, which is identified as an Urban Fringe Parish that can accommodate additional growth. Accordingly, the area is a location that is, in principle, recognised as a sustainable location for additional development.

The Greater Norwich Local Plan (GNLP) Regulation 18 Consultation document outlines how the GNLP will help to drive economic growth, to support the delivery of 45,000 additional jobs by 2036, enable growth in the economy, and support a thriving rural economy. The document acknowledges that there is significant potential for economic growth in the Greater Norwich area.

Greater Norwich: Employment, Town Centres and Retail Study (2017) concludes that the overall need for employment land (114 hectares) is significantly less than land currently allocated or permitted (340 hectares). On this basis, the GNLP Regulation 18 Consultation document states that there is no evidence to justify increasing the overall supply of employment land. However, the document states that whilst there is no need for additional land, there could be need for new allocations i.e. larger sites to target specific economic sectors. It also recognises that there is a need for supply to exceed demand to provide choice and competition and to provide for the full range and scale of business requirements, and to ensure that there is a good distribution of local opportunities across the urban and rural area.

As detailed above, the site is immediately adjacent to the NDR. The NDR is envisaged as a catalyst to support growth across the region, through increasing accessibility, and unlocking new sites to support future growth for the area, particularly those which lie around the NDR. The NDR aims to bring £1 billion of economic benefits to Norwich, through providing jobs and supporting businesses in the area.

The location of the site, in relation to the NDR, is highly beneficial; as it makes the site highly accessible and, therefore, an extremely suitable location for future development. The site also falls within a location which is well related to Norwich City Centre, the Airport Business Park, and falls within the Cambridge – North Tech Corridor. These factors ensure that the site is attractive to a range of potential occupiers, whilst also being complementary to existing employment allocations.

The size of the site also means that it is capable of satisfying a range of employment / business needs. More specifically, the site has the potential to accommodate large scale employment development that is required by new economic sectors, to small scale start up units. In terms of the latter, the site's location means that it also has potential to assist with the rural economy.

In addition, it should also be noted that the GNLP document recognises that a limited number of brownfield sites have been put forward for residential development. The NPPF requires Councils to make the most efficient use of land. On this basis, it is critical that the best possible use is made of brownfield land, which is mainly within Norwich and the urban fringe.

It is currently estimated that there is capacity on brownfield land for 1,500 additional homes in Norwich, along with 200 in the Broadland part of the urban fringe. The various Councils are undertaking work to see if any more brownfield sites can be identified for development.

Employment sites located within the urban area are often constrained due to, amongst other things, issues relating to access and amenity. As a result, they are potentially unattractive to prospective developers and occupiers. The reallocation of these sites to residential provides a unique opportunity for the Council to 'free up' brownfield land in the urban area for residential development. In order to ensure that the loss of such sites does not result in a shortage of suitable employment sites, it recommended that the site, which is capable of accommodating a range of business requirements, is allocated, in part, for employment purposes.

Given the scale of the site, it also provides an opportunity to provide development which both utilises the sites location to the NDR and provides an opportunity to complement proposed employment and residential uses. This could include small scale retail, particularly roadside retail / services and leisure, as well as education.

The site lies to the south of Horsford and the Northern Distributor Road (NDR), and to the north east of Drayton, being outside of the Settlement Limit. However, the site is bound to the north by the NDR, and Drayton Lane to the west, which provides access to Drayton.

The Horsford Neighbourhood Plan Submission Draft (2017) advocates a variety of aspirations for Horsford, in particular: the need for community meeting space; new outdoor recreation space; provision of additional

education and health care facilities; provision of mixed housing; enhancement of walkability and bike ability in the community; new business which fits in with the surroundings; and a new or expanded supermarket. Development on this site could help achieve, and exceed in places, the aspirations and objectives of the Neighbourhood Plan.

The site lies to the north of two sites which have been submitted as part of the GNL P Call for Sites process; GNL P0332 - Land at Reepham Road / Cromer Road (residential development and public open space) and GNL P0333 - Land at Reepham / Holt Road (proposed for residential development, improved cricket field, employment, roadside services and retail).

When considering the aggregation of all three sites, they provide significant potential to create a strategic extension between Hellesdon, Drayton and Norwich; with the NDR providing a logical defined, and defensible boundary. This would provide a strategic long term extension to Norwich, and would provide a range of new housing, jobs, leisure facilities and business space to meet the needs of Greater Norwich up until 2036.

The residential element of any development may be key to ensure that other aspects of the wider of the development, notably employment use, is viable. The site is also of a sufficient size to meet to provide a significant amount of public open space, which as well as meeting a local need, could provide a buffer between the residential and commercial elements of any development.

In terms of more detailed site-specific considerations, the HELAA identifies the site as a suitable location for development. It confirms through a 'Green' rating, that there are no constraints or impacts anticipated in relation to Utilities Infrastructure; Contamination and Ground Stability; Flood Risk; Market Attractiveness; Significant Landscapes; Historic Environment; Open Space; Green Infrastructure and Compatibility with Neighbouring Uses. Whereas, the following site-specific constraints are rated 'Amber': Access; Accessibility to Services; Utilities Capacity; Townscape; Biodiversity and Geodiversity; Transport and Roads. These are addressed below.

#### *Access*

In support of this representation, Orari Limited have produced an Access Appraisal (see attached) for the site, which demonstrates how sufficient access to the site could be provided. The appraisal details that, for a site of this size, usually two or three vehicular access points would be required. The appraisal states that access may be provided by: a new roundabout at the junction of Holly Lane and Reepham Road; one or two access roads onto Holly Lane; and two T-junctions onto Reepham Road.

To provide these junctions, it would also be necessary to reduce the speed limits of the local highway network, in particular: Holly Lane could be reduced from 60mph to 20mph, and Reepham Road, could be reduced from 50mph to 30mph, along the site frontage. Therefore, it is evident that sufficient access to the site can be created, to support development on this scale.

#### *Accessibility to Services*

The site lies within close proximity of both Horsford and Drayton.

Horsford is identified as a Key Service Village, with the village centre being approximately 1.1 miles to the north of the site, bisected by the NDR.

Horsford benefits from a variety of existing services, such as a: Post Office; Bakery; Primary School (split between two sites: one on Holt Road, and the other on Mill Lane); Village Hall; Pharmacy; Co-op; and a pub - all of which highlight how Horsford benefits from being a sustainable location, which could support future growth.

The site is also in close proximity to Drayton, which is identified as an Urban Fringe Parish, and is approximately 1.3 miles to the south west of the site. Drayton benefits from a wealth of existing services, in particular: a Supermarket; Bakery; Bank; multiple Pubs; Pharmacy; Medical Practice; Junior School; and, Infant School.

As part of any proposed development, footpaths could be provided along Drayton Lane. This would connect the site to the centre of Horsford, by connecting with existing footpaths on Holt Road, and connect the site to Drayton, by connecting to existing footpaths on Hall Lane. This would be in accordance with the aims of the Horsford Neighbourhood Plan and Drayton Neighbourhood Plan, which both aspire to increase walkability in the area, through providing a sustainable alternative to the car.

The site is not currently served by any form of public transport. However, as part of any development, a bus stop could be provided. The site benefits from being on a variety of bus routes: the 36 bus route which provides a frequent connection between Horsford and Norwich City Centre; 43a which provides a connection between Norwich City Centre and Reepham; and the 904 which connects Hellesdon and Horsford. Therefore, a new bus stop could be provided on the existing bus route to serve the site, and provide a further mode of sustainable transport, as an alternative to using a car.

The site also provides access to a range of services. In particular, the NDR provides a high quality transport network to the wider area, which aims to reduce congestion and increase accessibility across Norwich. The A140 provides a direct link from the site into the centre of Norwich, which provides a wealth of shops, services and employment opportunities. The site is also well related to the Norwich Airport Business Park, and therefore the site would be a logical extension to this.

Due to the size and scale of the site, a variety of new services and facilities could be provided within the site itself, or as part of the proposed developments to the south, such as the potential provision of a new Primary School and Local Centre. This would in theory make the site relatively self-sufficient in terms of local services, providing future occupants of the site ease of access to local facilities, ensuring that development on the site is sustainable.

Based on the above, the site is capable of comprising a sustainable location for development, in terms of accessibility to local services.

#### *Utilities Capacity*

The HELAA analysis raised concerns over whether the Utilities Capacity of the area would support development of the site. There is no evidence to suggest that there are any current issues with utility capacity locally; however, this would be assessed in detail through obtaining further technical advice.

#### *Townscapes*

The site lies to the south of Horsford and north east of Drayton, being bisected from the village by the presence of the NDR. Horsford contains two significant heritage assets which hold important value in regards to the character of the local townscape: Horsford Parish Church of All Saints, a Grade II\* Listed building (approximately 815m from the site), and Horsford Castle, a Scheduled Ancient Monument (approximately 1.40km from the site). Considering the distance of the site from these assets, and the separation of the site from Horsford by the presence of the NDR, it is considered that development on the site will not impinge on the setting and character of the heritage assets on the local townscape.

The development can be designed in a way which respect the form and character of the local vernacular, and the sites relationship to the surrounding setting. The site lies in an area of relatively open countryside, with the NDR bordering the site to the north; Reepham Road to the west, which is bordered by large mature trees and vegetation that obscure views of the site from the west; and to the south lies Holly Lane, Drayton

Farm (with associated farmyard), and open countryside. However, the impact on the character of the townscape will be minimal, as the presence of the NDR to the north of the site already adversely impacts upon the setting of the townscape. To mitigate the impact of the NDR, consideration could be given to provide landscape screening, which will both reduce the impact of the NDR on the site, and help to obscure views of the site from the wider townscape. The western boundary of the site provides a row of dense mature trees and vegetation, which obscure views of the site from the west, and could be retained through a considerate design. To the southern boundary of the site is Drayton Farm, along with open countryside. Drayton Farm, is a busy working farm, with a lot of frequent lorry movements to and from the farmyard. To help mitigate the impact of development on views to the south, and the dominance of Drayton Farm, the introduction of a landscape screening would restrict views of the site from the countryside.

In addition, as detailed above, the site has potential to come forward in conjunction with development of land to the to the south, which has also been put forward within the Greater Norwich Local Plan Regulation 18 Therefore, any impact on the townscape to the south would need be addressed as part of a wider development.

#### *Biodiversity and Geodiversity*

The site constitutes agricultural land and is typical of an intensive arable landscape, in which habitat loss is foreseen to be the main adverse impact of development on the site. It is envisaged that the impact of the proposed development could be mitigated via appropriate landscaping and scheme design, with the potential for ecological enhancement. A detailed Ecological Assessment would be provided during the process of preparing and submitting a planning application for the site.

#### *Transport and Roads*

In support of this representation, Orari Limited have produced an Accessibility Appraisal, which assess the local high network. This appraisal outlines how there are no traffic generation or highway safety issues which would preclude the provision of development on the site. Further technical advice in the form of a Transport Assessment would be obtained at a later date.

#### Summary

In conclusion, it is demonstrated above that the site, in its entirety, is suitable for a mixed-use development. The technical evidence submitted alongside this Representation, alongside the information detailed above, demonstrates that there are no constraints regarding the delivery of the site.

#### **Available**

The site is owned, in its entirety, by Mrs Rachel Foley.

It is anticipated that development on the site would be both available and developable in 1 to 15 years.

#### **Achievable**

Based on the suitability assessment above, there are no site-specific constraints which could threaten the delivery of a mixed-use development on the site. Therefore, a mixed-use development on the site is deemed to be entirely achievable.

#### **Viable**

Development of the site for a mix of uses is, at this moment in time, considered viable, taking into consideration the various policy requirements in relation to matters such as affordable housing provision and CIL contributions. A variety of uses would be provided on the site, to help contribute to the viability of the overall development on the site. Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary.

## Summary

As outlined above, the site is suitable, available, achievable and viable, and is therefore developable. The foregoing text demonstrates that the site is a suitable location for further development in all respects and is capable of accommodating a mixed-use development, including commercial, leisure, business uses, alongside roadside retail and residential dwellings to the south, which can help satisfy identified growth requirements during the period up to 2036.

Economically, the site holds significant potential to supply employment land, which would support the long-term planned economic growth of the Greater Norwich Area. Development on the site would work towards unlocking and utilising the potential of the NDR. In addition, the development of the site would provide a significant number of jobs during construction, and jobs in the long term, generated by the businesses who would locate on the site.

Socially, the scale of development envisaged is such that it will create a sustainable community, through providing a range of employment, retail, and leisure opportunities, along with residential dwellings. A mixture of dwelling types, sizes and tenures will be provided, informed by local housing need, and CIL payments made will help to provide and enhance the local facilities on offer in Horsford, as identified as key aspirations in the Horsford Neighbourhood Plan Submission Draft.

Environmentally, sustainable means of transport could be provided, such as the installation of a new bus stop; which would be served by existing bus services. These services provide relatively frequent services into Norwich City Centre, Reepham and Horsford. This would provide future residents, employees and visitors to the site the option to utilise sustainable transport methods, as well as connecting to a variety of employment opportunities, particularly to those on offer in Norwich City Centre. In regard to the environment, the site holds limited ecological value due to being intensively farmed, and therefore development on the site would not impose any environment impacts which could not be mitigated within the development.

On this basis, we request that the site should be taken forward as an allocation for mixed use development in the emerging Local Plan.