

GNLP 2133: Glebe Farm North

Regulation 18 Stage B Consultation Response - December 2018

Background

This Representation has been prepared by Bidwells, on behalf of Mrs Rachel Foley, in response to the Greater Norwich Local Plan Focussed Sites Stage B (Regulation 18) consultation.

On behalf of our client, we strongly recommend that the site is allocated for employment-led mixed use development. As previously demonstrated (GNLP2133), the site occupies a highly sustainable location, given the local services on offer in Horsford and Drayton, and proximity to Norwich City Centre. Development on the site would give rise to a variety of social, economic and environmental benefits; helping to achieve the three objectives of sustainable development.

The site has received a preliminary suitability assessment within the October 2018 Housing and Economic Land Availability Assessment (HELAA) Addendum, published as part of the current Regulation 18 consultation. This Representation endeavours to address the potential constraints identified in the HELAA assessment Site Proposals Addendum.

Clarification of Site Description

Within the HELAA and Site Proposals Addendums, the description of proposed uses on the site vary, and do not make any reference to the potential for residential development on the site (which was detailed on the Regulation 18 'Call for Sites' form). In order to provide clarity, it is requested that the description of proposed uses is amended to state: *'an employment-led mixed-use development, including roadside retail/services, leisure, training, education facilities; and the potential for residential development'*.

Comments on HELAA Addendum, October 2018

The site has been assessed within the HELAA, with most of criteria under the suitability assessment achieving green ratings. The following criteria all achieved a **green** rating:

- Accessibility to Services;
- Utilities Infrastructure;
- Contamination and Ground Stability;
- Flood Risk;
- Market Attractiveness;
- Biodiversity and Geodiversity;
- Historic Environment; and
- Open Space and Green Infrastructure.

The following criteria within the HELAA assessment received **amber** ratings. These ratings are explored in further detail below:

- **Access**

In support of the Regulation 18 'Call for Sites' Submission, Orari Ltd produced an Access Appraisal, which details that there would be the opportunity to provide two or three points of vehicular access onto Holt Road, which would accord with NCC Standards. In addition, the Access Appraisal details that pedestrian and cycle routes within the site's curtilage could provide links to local community services and facilities, and the newly constructed cycle route at the southern end of Holt Road.

Therefore, we concur with the rating of access as amber, as there are potential access constraints, however, as detailed within the Access Appraisal, these can be sufficiently overcome through development of the site.

- **Utilities Capacity**

In accordance with the HELAA Methodology, an amber rating is given to utilities capacity where there are no available utilities on the site, but potential for improvements to facilitate capacity. We concur with this rating, as no utilities are currently present on the site, but potential to facilitate capacity for development on the site exists. Given the site's close relation to Horsford, Drayton and Hellesdon, it is envisaged that utilities would be in place in close proximity to the site, to serve future development.

- **Significant Landscapes**

We disagree with the rating of amber for significant landscapes. The HELAA Methodology outlines that sites are rated amber where development of the site would have a detrimental impact on sensitive or other landscapes, which could be mitigated. Sensitive landscapes are identified as being areas within or adjacent to National Parks, the Broads, or Areas of Outstanding Natural Beauty. Other landscapes include Strategic Gaps or areas identified as sensitive in Landscape Character Assessments.

There are no identified sensitive landscapes, Strategic Gaps, or other landscapes on, or within close proximity to the site. Neither is the site identified as falling within close proximity to any sensitive landscape areas, within the Broadland District Council Landscape Character Assessment SPD (2013). On this basis, significant landscapes should be rated green, in accordance with the HELAA Methodology.

- **Townscapes**

As previously detailed, there are no Listed Buildings on, or within close proximity to the site. Nor does the site fall within or adjacent to a Conservation Area. In spite of this, the site is approximately 1.15km from Horsford Castle, a Scheduled Ancient Monument. However, the site is bisected from the Scheduled Ancient Monument by a range of fields, hedgerows, mature trees, and roads.

The HELAA Methodology recognises that an amber rating is given for townscapes where development of the site would have a detrimental impact on townscapes which could be mitigated. For the purposes of the Methodology, sensitive townscapes are defined as:

- Areas in/adjacent to National Parks, the Broads, Areas of Outstanding Natural Beauty, Conservation Areas; and/or,
- Where development may affect concentrations of Listed or Locally Listed Buildings with collective townscape value; and/or,
- The loss of protected trees on the amenity of the area.

Accordingly, we disagree with the amber rating of significant landscapes. It has been demonstrated that the site is not within close proximity to, or would not affect the setting of, any sensitive landscapes.

Therefore, townscapes should be rated green, in accordance with the HELAA Methodology, as development of the site would have either a neutral, non-detrimental impact on townscapes.

- **Transport and Roads**

We concur with the rating of Transport and Roads as amber, as any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated. The HELAA Methodology recognises that when assessing any potential impact, consideration will be given to accessibility to public transport and key services; development potential and associated traffic generation; existing traffic conditions and capacity of local junctions.

As outlined in the Access Appraisal submitted by Orari Ltd in support of the Regulation 18 'Call for Sites' submission, there are no traffic generation or highway issues which would preclude development on the site, and pedestrian and cycle routes can be provided within the site's curtilage. As previously detailed in the Regulation 18 'Call for Sites' Consultation, as part of any development on the site, a bus stop could be provided near to the site, which could be served by existing bus routes. On this basis, we agree with the amber rating for transport and roads, as any potential impact could be reasonably mitigated through development of the site.

- **Compatibility with Neighbouring Uses**

An amber rating within the HELAA Methodology recognises that development of the site could have issues with compatibility with neighbouring uses, but these could be suitably mitigated through development of the site. As previously demonstrated, it is recognised that the site is surrounded to the north by farmland and Home Farm, to the east and west by farmland (with a cattery also being situated on the western boundary of the site). To the south, the site is bound by the Broadland Northway.

Accordingly, we agree with the rating of amber for compatibility with neighbouring uses, as it is recognised that appropriate mitigation would overcome any potential issues with neighbouring uses.

Comments on Site Proposals Addendum, October 2018

The Site Proposals Addendum outlines that there would be infrastructure and landscape requirements on the site. We agree with both of these comments, in which there would be infrastructure and landscape requirements in achieving development on the site. Both requirements will be explored and assessed, with detail provided, as part of any planning application(s) for the site.

Conclusion

The site is suitable, available, achievable and viable, and is deliverable within the first five years of the Greater Norwich Local Plan period. There are no constraints that would prevent the site from coming forward for employment-led mixed use development, with potential land for residential uses.

On this basis, the site should be taken forward as an allocation for employment-led mixed use development in the emerging Local Plan. Development on the site would meet all three objectives of sustainable development, and would help to drive economic growth across the district through the delivery of some of the 45,000 additional jobs by 2036.