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Date: 14/12/2018

Greater Norwich Projects Team
c/o Norfolk County Council
County Hall
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Dear Sir/Madam,

**GREATER NORWICH LOCAL PLAN REGULATION 18 CONSULTATION RESPONSE:
FORMER MEAT PROCESSING PLANT, GREAT MOULTON (GNLP2003)**

The above site was submitted within the January-March 2018 Stage A Regulation 18 consultation window and assigned the site reference GNLP2003, thereby constituting a 'new' site in terms of the current Stage B Regulation 18 consultation.

Subsequently, the site has received a preliminary suitability assessment within the October 2018 Addendum Housing and Economic Land Availability Assessment (HELAA), released as part of the current Regulation 18 consultation. This representation endeavours to address any potential constraints/uncertainties identified in the HELAA assessment for this site through the submission of a suite of technical evidence, including:

- Access Appraisal, prepared by Orari Transport Planning;
- Preliminary Ecological Assessment, prepared by The Ecology Consultancy; and
- Preliminary Flood Risk Assessment and Surface Water Drainage Strategy, prepared by BLI Consulting.

The findings of these technical reports will be discussed within this representation, to demonstrate the deliverability of the proposed residential development, alongside a consideration of the implications of the revised NPPF.

These technical assessments, alongside our Assessment of Deliverability and the Indicative Site Plan, demonstrates that the site can deliver residential development in a sustainable location within the Plan period to 2036.

In accordance with the National Planning Policy Framework's (NPPF) definitions of 'deliverable' and 'developable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable.

These points are addressed in further detail below.

Assessment of Deliverability

Suitable

The site is situated to the north of Great Moulton's settlement boundary, with residential properties to the south, arable land to the north and west, and Frith Way to the east. The site lies adjacent to the settlement boundary, so the development of the site would represent a logical extension. Furthermore, the site lies within a residential area, so residential development on site would not represent a departure from the character of the area.

The Meat Processing Plant ceased trading in 2015, and the site has been vacant ever since. Since early July 2018, the site has been the subject of a professional marketing campaign designed to understand whether the site is viable for commercial uses. While enquiries have been received, no concrete interest has been shown or offers received. It is therefore becoming apparent that the site is no longer commercially viable for commercial uses, indicating that an alternative use should be implemented to prevent a substantial brownfield site from falling into disrepair and disuse.

The former Meat Processing Plant therefore represents a site that is well suited for residential development, which makes use of vacant, unviable brownfield land. The site has been assessed in the HELAA, with most criteria achieving **Green** ratings. These are summarised below:

- **Utilities Infrastructure:** **Green** rated.
- **Significant Landscapes:** **Green** rated. The redevelopment of the site is not anticipated to have any adverse impact upon any landscape designations.
- **Historic Environment:** **Green** rated. The site is not located within the vicinity of any heritage assets.
- **Open Space and GI:** **Green** rated. The redevelopment of the site will not result in the loss of any open space or green infrastructure.
- **Compatibility with Neighbouring Uses:** **Green** rated. Residential uses on site are considered by the Greater Norwich Local Plan team to be compatible with the surrounding context.

Some suitability criteria within the HELAA assessment of the site received **Amber** ratings. These issues are explored in more detail below:

Biodiversity and Geodiversity: The site is not protected by a national or international designation, or a regional or local protection. The designated boundary of the Aslacton Parish Land Site of Special Scientific Interest (SSSI) is ~1.6km north-west. While the site falls within the Impact Risk Zone (IRZ) for the SSSI, the site's separation from the SSSI suggests that the conversion of the site to residential uses would not result in any adverse impact to the SSSI.

The only County Wildlife Site (CWS) within the vicinity of the site is Muir Lane Meadow, which lies an ~1.5km south west of the site, while a Roadside Nature Reserve (No. 5) lies 1.6km to the north-east. Similarly, any impacts are thought likely to be negligible, by virtue of the distance of the Former Meat Processing Plant from these sites.

On site, the mature broad-leaved trees around the perimeter of the site qualify as a Habitat of Principal Importance. The position of these trees along site boundaries means that they are unlikely to be impacted by the change of use of the site, so these trees will be retained as part of the residential regeneration of the site.

The Preliminary Ecology Appraisal submitted to support this representation, prepared by The Ecology Consultancy, concludes that mitigation for protected species (if present) is feasible and attainable, and the likely impacts on the majority of species can be mitigated via appropriate landscaping and scheme

design. Such landscaping could contribute to local countryside projects and initiatives, and will provide a net biodiversity gain. Please see the Strategic Ecology Appraisal for more information.

From this, it is apparent that the redevelopment of site GNLP2003 would not have a detrimental impact on any designated site, protected species or ecological networks, so should receive a **Green** rating in relation to biodiversity and geodiversity.

Access: The proposed development would be served by the existing point of access from Frith Way to the east of the site. The speed limit on Frith Way and Frost's Lane within the immediate vicinity of the site's vehicular access is the Great Moulton village speed limit of 30mph. The site's existing vehicular access with Frith Way currently has visibility splays of 2.4m x 90m along both Frith Way and Frost's Lane. These visibility splays comply with DMRB requirements for roads subject to a 30mph speed limit, and exceed Manual for Streets visibility splay requirements (for 30mph roads) of 2.4m x 59m.

From this, it is apparent that a suitable and safe access for residential purposes can be provided at the site, so the site should receive a **Green** rating in relation to access.

Accessibility to Services: The closest bus stops to the site are located on the south-eastern edge of Great Moulton, on Woodrow Lane, known as the 'Wacton Turn'. These stops serve one bus service (Simmonds Coaches No.1 Service), providing frequent access to Diss and Norwich between Mon-Sat. The stops are located 1.29km from the site (an approx. 16 minute walk) from the centre of the site, which is deemed an acceptable walking distance when considering the average adult walking speed. The site is accessible to Aslacton Primary School and within easy cycling distance (4.5km) from Long Stratton to the north. We therefore concur with the **Amber** rating assigned to the HELAA regarding this aspect.

Utilities Capacity: The capacity for existing utilities to accommodate residential development on site will be assessed in detail as part of a detailed planning application. Liaison with utilities providers will be undertaken to understand whether appropriate contributions or enhancements are required to facilitate the development. We therefore concur with the **Amber** rating assigned to the HELAA regarding this aspect.

Contamination and Ground Stability: Considering the site's former use, it is anticipated that an element of ground contamination could be present on site. If this is the case, any contamination will be remediated as part of the redevelopment of the site. We therefore concur with the **Amber** rating assigned to the HELAA regarding this aspect.

Flood Risk: The site is located entirely within Flood Zone 1, so the site is not considered to be at risk from river/sea flooding. However, the HELAA assessment of the site notes that the site has some risk of surface water flooding. To gain more evidence of any flooding implications on site, BLI Consulting were instructed to prepare a Preliminary Flood Risk Assessment and Surface Water Drainage Strategy. An area of surface water flooding has been identified to the north of the site and appears to be associated with the watercourse which crosses part of the site's boundaries in a north-easterly direction.

The modelled flood depth has been confirmed as less than 300mm and a flow velocity of greater than 0.25 m/s in this area. This area has been modelled in terms of a 30-year, 100-year, 100+ year and 1,000 year storm event. The Report concludes that this area, alongside an isolated area of low surface water flood risk through the centre of the site, will not preclude the redevelopment of the site, and the site is considered appropriate from a flood risk and surface water drainage perspective, subject to the implementation of the recommended mitigation measures put forward in the Report.

From this, it is apparent that the whole site is suitable from a flood risk and surface water drainage perspective, and an appropriate surface water drainage strategy, as set out in the Report submitted with

this representation, can be delivered as part of the redevelopment of the site. The site should receive a **Green** rating in relation to flood risk, and the HELAA assessment of the site should also be revised to consider the entire site suitable for the land availability assessment.

Market Attractiveness: Great Moulton is a desirable village, with good links to Long Stratton, Diss and Norwich. It is being demonstrated, through a professional marketing campaign, that the site is no longer viable for commercial uses, so the residential conversion of the site will create a more desirable use for which there is market demand.

From this, it is apparent that site GNLP2003 should receive a **Green** rating in relation to market attractiveness.

Townscapes: The site is not within any sensitive townscapes i.e. an Area of Outstanding Natural Beauty. The site is well enclosed by boundary planting. Equally, the redevelopment of the site will transform a derelict, unsightly brownfield site into a more visually desirable residential development with appropriate landscaping. It is therefore contended that the redevelopment of the site will have a positive impact on Great Moulton's townscape.

From this, it is apparent that site GNLP2003 should receive a **Green** rating in relation to townscapes.

Transport and Roads: The HELAA Assessment contends that the local road network is unsuitable to support the redevelopment of the site. To address this position, Orari Transport Planning undertook a Highway Safety Review to determine the suitability of the local road network. The Review found that a total of one PIA (Personal Injury Accident) (1 no. slight severity accident) was recorded within the vicinity of Great Moulton village (on Frith Way in November 2016, circa 270m south of its junction with Gore Lane) during the five-year study period. No fatal or serious severity PIAs were recorded, and no PIAs were recorded within the immediate vicinity.

Moreover, Orari Transport Planning used TRICS data to understand how the traffic impact of the residential use of the site compares against the former commercial use of the site. This analysis discovered that a residential development of up to 30 dwellings on site would generate far fewer vehicle movements than the prior commercial use, thereby proving that the residential conversion of the site would have a far lesser impact on the transport and road network than the previous commercial use. Please see Orari Transport Planning's Access Appraisal for further detail.

From this, it is apparent that the development of the site will not have a detrimental impact on the functioning of a trunk road and / or local roads. Therefore, it should be afforded **Green** rating.

From this analysis, it can be ascertained that the constraints on site can be mitigated through development with supporting technical evidence and good design.

Available

The site, in its entirety, is owned by our client, and there are no leases or restrictive covenants on the site consequently, the site is readily available for development.

Achievable

The NPPF states that planning policies should be constructed in a way that makes as much use as possible of 'brownfield' and/or underutilised land (Paragraph 117). Planning policies should also give substantial weight to the value of using suitable brownfield land for residential development where appropriate (Paragraph 118).

Site GNLP2003 represents an opportunity to redevelop a disused and unviable brownfield site for residential uses. The professional marketing campaign for the site is demonstrating that the site is

unviable for commercial uses, so the residential redevelopment of the site offers an opportunity to repurpose the site in a planned manner, to prevent it from falling into a state of disrepair and environmental degradation. The site is well related to the existing settlement, and the re-use of this brownfield site should be apportioned great weight when selecting preferred site options.

The Greater Norwich Local Plan Regulation 18 Consultation document, released as part of the January-March 2018 consultation, identified, in the analysis of the six growth options, that the allocation of small/medium size sites for residential development is paramount to securing housing delivery in the Plan period to 2036:

The size of allocations will also be a key consideration. Whilst larger sites can provide new services and facilities, recent experience has shown that they are more difficult to get off the ground. Smaller sites are often more likely to deliver and can support the vitality of existing settlements.

Since the Stage A Regulation 18 Consultation, the revised National Planning Policy Framework (NPPF) now requires Local Plans to accommodate, through the development plan and brownfield registers, at least 10% of their housing requirement on sites no larger than one hectare (Paragraph 68). This has been implemented to encourage small-scale housebuilders, who can build out sites relatively quickly.

While site GNLP2003 comprises a land area greater than 1 hectare (1.13ha), the site can be considered as a medium-sized site, which can be delivered quickly to achieve appropriate and proportionate growth in terms of Great Moulton's local context.

Furthermore, based on the suitability assessment above, it is demonstrated that there are no site-specific constraints which could threaten the delivery of residential development on the site. Therefore, residential development on the site is deemed to be entirely appropriate and achievable.

Viable

The development of the site is considered viable, taking into consideration the various policy requirements in relation to matters such as CIL contributions. 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 deliverable and developable, in accordance with the NPPF. On this basis, the site should be taken forward as an allocation for residential development in the emerging Local Plan, and would represent sustainable development.

As demonstrated by this representation, those issues raised by the HELAA assessment can be addressed through detailed design of a scheme on this site, as part of any planning application process. There are no matters which would preclude development on the site.

We trust that these representations will assist the Greater Norwich Local Plan team in progressing its Local Plan review towards the Preferred Options stage, the consultation for which we currently understand is programmed to commence in Autumn 2019.

I would be grateful if you would acknowledge receipt of these representations.

Should you have any questions at this stage then please contact me.

Yours faithfully

Jake Lambert
Planner, Planning