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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:
HIGH BRECK FARM (GNLP2047)**

In response to the above consultation, we would like to take this opportunity on behalf of our client to promote High Breck Farm for residential development.

The above site was submitted within the January-March 2018 Stage A Regulation 18 consultation window and assigned the site reference GNLP2047, 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. The representations also consider the implications of the revised NPPF in relation to the site.

As outlined by the March 2018 representation, site GNLP2047 comprises two separate sites:

- High Breck Farm. The 'L' shaped parcel of land to the north of the site; and
- High Breck, the land to the south comprising the bungalow known as High Breck, with gardens and an associated outbuilding.

The combination of the High Breck Farm site with the adjoining High Breck site created a 0.61ha site. However, the owner of High Breck intends to sell the plot and bungalow in due course. Therefore, this representation seeks to reduce the size of site GNLP2047 to include High Breck Farm only. A revised red line plan accompanies this representation. The site now measures 0.37ha.

The representation demonstrates that High Breck Farm remains suitable for small-scale residential development.

In accordance with the NPPF's Annex 2 Glossary definitions of 'deliverable' and 'developable', the site is available for housing now, offers a suitable and sustainable location for development now, and it is achievable with a realistic prospect that housing will be delivered on the site within five years. In accordance with the definition of 'developable', it is envisaged that the site could be viably developed.

These points are addressed in further detail overleaf.

Assessment of Deliverability

Suitable

The site is situated beyond the settlement boundary of Taverham. However, the site is situated within a cluster of residential dwellings, with good transport connectivity. The small-scale redevelopment of the site for residential uses would, therefore, not represent a departure from the character of the area.

High Breck Farm has been used historically for small-scale commercial uses, including piggeries, a scaffolding yard and a coach depot. However, commercial uses at the site ceased around 15 years ago.

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

- **Accessibility to Services:** **Green** rated. The site benefits from excellent access to the Norwich Northern Distributor Road, and a range of services in Taverham within walking distance, including the new mixed use commercial development due to commence to the south of the site on Fir Covert Road.
- **Utilities Capacity and Utilities Infrastructure:** both **Green** rated.
- **Flood Risk:** **Green** rated. The site lies entirely within Flood Zone 1, with no risk of surface water flooding.
- **Significant Landscapes and Townscapes:** **Green** rated. The redevelopment of the site is not anticipated to have any adverse impact upon any landscape designations or significant townscapes.
- **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.
- **Market Attractiveness and Compatibility with Neighbouring Uses:** both **Green** rated. The site is located within a desirable location to the north of Norwich, and residential uses are 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 within a designated site that has national or international protection. Furthermore, the site is not within a site that has regional or local protection. The River Wensum lies to the south-west of the site. As the HELAA assessment acknowledges, the site is situated a considerable distance from the River, so the site's location within the SSSI impact zone will not preclude development. The site is not considered to contain any features of ecological significance; none of the trees on site have been awarded TPO status and most of the vegetation on the High Breck Farm site has become overgrown because of disuse. From this, it is apparent that the site would not have a detrimental impact on any designated site, protected species or ecological networks should receive a **Green** rating.
- **Access:** Access to the site will be delivered through formalisation of the existing access to Fir Covert Road to the west of the site. While the site is not served by a footpath immediately fronting the site, it is envisaged that safe pedestrian linkages to existing footpaths on Fir Covert Road can be delivered as part of the redevelopment of the site. The site is served by bus stops on Fakenham Road (Beech Avenue nr and Beech Avenue opp). Both stops are within walking distance of the site. These stops serve the Number 29 bus route, which provides access to and from Norwich City Centre every 30mins (1 hour in the evenings). Fir Covert Road is served by footpaths, enabling safe access on foot to Taverham centre. The site is accessible by all means of access should therefore receive a **Green** rating for this aspect.

- **Transport and Roads:** The site benefits from direct access onto Fir Covert Road. At this point, Fir Covert Road is subject to a 40mph speed limit, and the necessary visibility splays are likely to be accommodated. The site is not encumbered by any public rights of way. Furthermore, the site is situated within close proximity to the NDR, allowing for excellent connectivity with the wider area.. From this, it is considered that given the scale of the development and the associated vehicle movements, the site should receive a **Green** rating.
- **Contamination and Ground Stability:** The site is brownfield, with a history of varied commercial and agricultural uses. The site may therefore contain some elements of ground contamination, which can be remediated as part of the redevelopment of the site. The site should therefore receive a **Amber** 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 covenant on the site consequently, the site is readily available for development.

Achievable

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.

Land at High Breck Farm comprises a site of less than one hectare in size (0.37ha), which can be delivered quickly to achieve appropriate and proportionate growth in terms of Great Plumstead's local context. This site would be taken forward by a small-scale housebuilder, and significant weight should be apportioned to its compliance with the revised NPPF in this respect.

Furthermore, the suitability assessment above has 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, of the scale proposed, is deemed to be entirely 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. 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