



March 2020

GNLP Site Submission

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Information

Client	Mrs Caroline J Comer Moy & Mr Ivan Moy
Site Address	Council Field, Heath Lane, Lenwade, (Gt. Witchingham), NR9 5QN
Date	March 2020
Local Planning Authority	Broadland District Council

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1.0 Introduction

- 1.1 The Greater Norwich Local Plan (GNLP) is being produced by **Broadland District Council**, (hereafter BDC), Norwich City Council and South Norfolk District Council working together with Norfolk County Council through the Greater Norwich Development Partnership (GNDP).
- 1.2 The GNLP will cover the period to 2038 and will identify sites for new homes, jobs and infrastructure. As well as welcoming the submission of new sites for potential allocation in their Local Plan as part of the GNLP Regulation 18 'Preferred Options' stage consultation, the consultation document also identifies those site that it currently 'prefers' for allocation in addition to those 'known' sites that they currently consider 'unreasonable' for allocation.
- 1.3 **Our client notes the identification of their site (GNLP0548) as an 'unreasonable option' for meeting the emerging housing requirement within the settlement of Lenwade (Gt. Witchingham) at this stage in the emerging Local Plan's preparation.**
- 1.4 The intention of this statement is to affirm the suitability, availability and achievability of the site GNLP0548 for inclusion within the GNLP and the evidence base documents the that will inform its preparation. The consultation itself commenced on 29th January 2020 and will close on the 16th March 2020.
- 1.5 Parker Planning consider that the site would make a valuable contribute to housing land supply as part of a more logical, coherent and crucially sustainable settlement expansion scheme that would assist in meeting GNLP's growth aspirations for the Village Cluster(s) in the plan period to 2038. **The allocation of site GNLP0548 alongside currently 'preferred' site GNLP0608 would mean that there is less pressure on the GNDP to allocate less sustainable sites across the village cluster(s) that are expected (cumulatively) to provide 2,000 dwellings in the plan period.**
- 1.6 This statement has been prepared in order to satisfy the requirements of the joint Norfolk Housing and Economic Land Availability Assessment Methodology (HELAA, 2016) in addition to the requirements of the consultation response form issued as part of the current Regulation 18 stage consultation.

2.0 Site and Context

- 2.1 The site comprises uncultivated grassland currently used for pony grazing. The site is bound

immediately to the south by the residential Heath Close and to the east by the residential Hubbards Loke. Hubbards Lane forms the western boundary whereas there is a further expanse of grassland lying to the north.

- 2.2 The site has an area of 1.81ha and has the potential to accommodate approximately 20 dwellings. This figure is consistent with the HELAA methodology that prescribes a density of 25dph on sites (Broadland) District-wide.



Fig.1 Plan illustrating the position of or client's site (GNLP0548) in relation to the existing settlement boundary of Lenwade (Gt. Witchingham). Source: GNLP Reg. 18 Consultation

Interactive Map.

3.0 Designations & Constraints

- 3.1 Lenwade, Great Witchingham, Weston Longville, Alderford, Attlebridge, Little Witchingham and Morton on the Hill form a cluster in the emerging Greater Norwich Local Plan, although no sites have been promoted in Alderford, Little Witchingham or Morton-on-the-Hill. The GNDP's *Towards a Strategy document* identifies that 2,000 dwellings in total should be provided between all the village clusters. Services and facilities in this particular cluster include a primary school, village hall, GP and employment opportunities.
- 3.2 Lenwade/Great Witchingham is surrounded on three sides by water, which limits road access to the village to some extent. Due to the proximity of several bodies of water, flood issues are a concern. The River Wensum SSSI and several CWSs are also constraints, as well as the local road network capacity.
- 3.3 The current capacity of Great Witchingham Primary Academy is rated as red meaning that there are significant capacity issues. It is a small landlocked site with catchment numbers up to PAN (Published Admission Number). Therefore, only limited development of 12-20 dwellings is considered to be appropriate.
- 3.4 The development site is identified by the Environment Agency as being within 'Flood Zone 1' in its entirety and as such the site is at low risk of flooding from surface water. However, land to the north and east of the site does lie within Flood Zones 2/3.

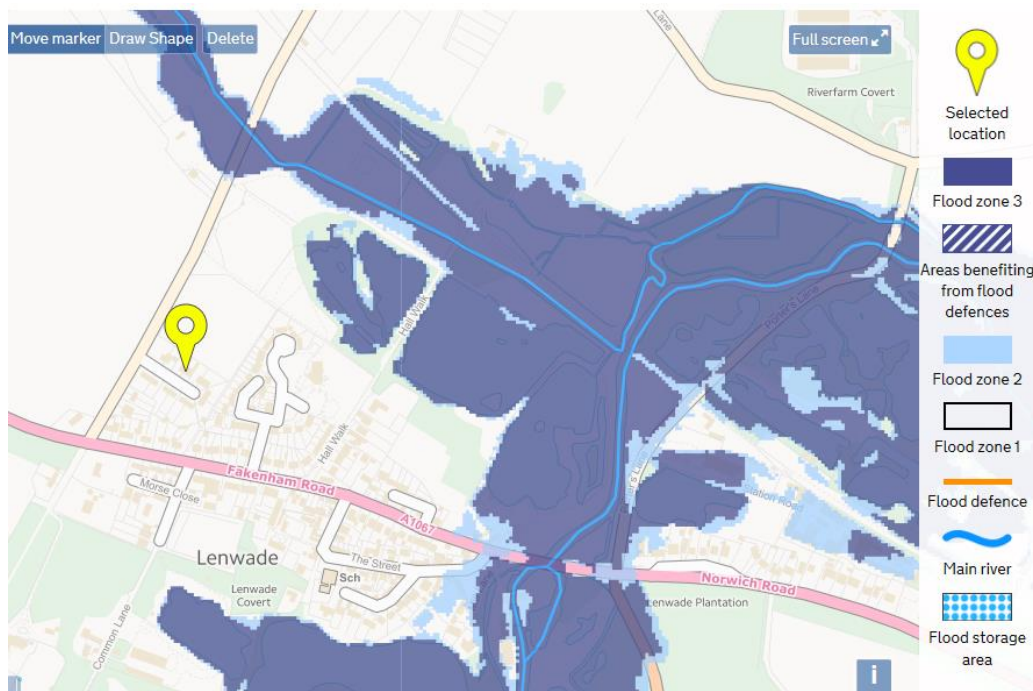


Fig 2. Map identifying land within Flood Zones 2/3 to the north and east of the site.

- 3.5 The site lies in an area designated as ‘countryside’ (i.e. outside of any defined settlement boundary) where new development would normally be more restricted (Policy GC2, BDC Development Management Policies DPD, 2015). However, our client is seeking the inclusion of their site within the development boundary as an allocation within the context of the Council’s emerging GNLP, so this ‘constraint’ is not particularly pertinent.
- 3.6 There are no archaeological records pertaining to the site. Lenwade (Gt. Witchingham) does not have a conservation area.
- 3.7 Lenwade (Gt. Witchingham) does not have an adopted Neighbourhood Plan or an emerging one.
- 3.8 The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. However, as the site is under 2 hectares it is exempt from the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 – ‘Safeguarding’.

4.0 Suitability including assessment of potential ‘constraints’ & ‘impacts’

- 4.1 As indicated above, Lenwade (Gt. Witchingham) has been established as a ‘Village Cluster’

on the basis of its level of 'Core' and 'Secondary' service provision and its geographical/functional relationship with other settlements in the locality. The settlement is therefore considered to be a relatively sustainable location for new development.

- 4.2 The settlement of Lenwade (Gt. Witchingham) is also well related to higher order settlements including the City of Norwich which lies just 7 miles to the south-east, where there a full range of services and facilities available for current and future residents of the Village Cluster. Lenwade (Gt. Witchingham) is extremely well served by several bus services including 23 (Horningtoft - Norwich), 29A (Fakenham – Easton College), 608 (Drayton-Reepham) X29 (Fakenham – Norwich).
- 4.3 To assess the suitability of sites the HELAA methodology document (intended to accord with both local and national planning policy and guidance) prescribes a red, amber, green (RAG) approach to assessing various types of 'constraints' on a site's deliverability in addition to potential 'impacts' arising.
- 4.4 For a site to be 'taken forward' and included in the HELAA capacity assessment, sites are expected to achieve either an amber or green rating against all suitability criteria and furthermore, meet the availability and achievability 'tests'. Some sites will have constraints and impacts that are insurmountable and thus undermine their suitability for development.
- 4.5 Following the RAG assessment prescribed in the methodology, the LPA concluded within the context of the *HELAA December 2017* document (relevant extract to be found at appendix B):

This site is at the north of the village, adjacent to recent housing development on two sides, so relates well to the existing built form and has good access to services. Initial highway evidence has indicated that a suitable access could be achieved, and that any impact on local roads could be mitigated. There are no known constraints from utilities infrastructure, contamination or ground instability, and there would be no loss of public open space. The site contains some areas at risk of surface water flooding. Development here would not impact on any sensitive landscape or townscape but there is a CWS nearby and a PRoW on the site boundary. Although the site has some constraints, it is considered suitable for the land availability assessment.

For the purposes of the HELAA capacity assessment this site is considered to be SUITABLE.

4.6 Furthermore, the current Consultation Draft GNLP identifies:

This site is within walking distance of Great Witchingham Primary Academy but it is considered to be unreasonable for allocation as Heath Lane is narrow with no footway and there is no scope for improving the carriageway width or providing a footway, therefore it is not possible to deliver a safe route to school. There is considered to be a better site to meet the capacity identified for the cluster.

- 4.7 It is for this reasons that the site now appears as a ‘unreasonable Option’ within the context of the consultation draft GNLP. For the reasons outlined below, Parker Planning consider the site suitable (‘reasonable’) for inclusion within the HELAA and GNLP. To affirm our client’s site as a reasonable option, we have undertaken our own RAG assessment, intended to accord with the combined Authority methodology (2016).

Potential Site Constraints

- 4.8 Access to site – The access to the site will be taken from Heath Lane. As identified in the HELAA (2017 – Appendix B) initial highway evidence has indicated *that a suitable access could be achieved and that any impact on local roads could be mitigated.* **RAG assessment = Green.**
- 4.9 Access to Local Services and facilities - The site relates particularly well to the settlement and its centre including all the facilities and amenities found therein and as outlined in this statement. The HELAA (December 2017 – Appendix B) identifies how the site relates well to the existing built form of the settlement *and has good access to services.* It is the contention of the GNLP that a safe route cannot be provided from the site to the local school. However, the LPA have permitted other recent development in this location. Furthermore, there is an existing ‘cut-through’ leading from the eastern end of Heath Close that future residents could use to access all of the village’s amenities ‘safely’ including the school. **RAG assessment = Green.**
- 4.10 Utilities Capacity – Although ‘greenfield’, the site relates well to the existing form of Lenwade (Gt. Witchingham). The HELAA (December 2017 – Appendix B) recognises that *there are no known constraints from utilities infrastructure.* **RAG assessment = Green.**
- 4.11 Utilities infrastructure – Although ‘greenfield’, the site relates well to the existing form of Lenwade (Gt. Witchingham). The HELAA (December 2017 – Appendix B) recognises that *there*

are no known constraints from utilities infrastructure. **RAG assessment = Green.**

- 4.12 Contamination – This is a ‘greenfield site’. The GNLP’S own HELAA (December 2017 – Appendix B) recognises there are no known contamination or ground stability issues pertaining to the site. **RAG assessment = Green.**
- 4.13 Flood Risk – The site lies within Flood Zone 1 in its entirety although an appropriate Flood Risk Assessment (FRA) is a likely requirement given the scale of the development and land within flood zones 2/3 to the north and east of the site (see fig. 2 above). **RAG assessment = Green.**
- 4.14 Coastal Change – This site is located some distance from the coast and is not associated with any Coastal Hazard Zone(s) or similar. **RAG assessment = Green.**
- 4.15 Market Attractiveness – This is an extremely popular place to live with a demonstrable need for both market and affordable homes. As with the adjoining site, our client can confirm that development is viable. The site lies within CIL Charging Zone B which itself would suggest that development in this location must be viable. **RAG assessment = Green.**

Potential Site Impacts

- 4.16 Landscape/townscape – Any development would be sympathetic to existing development in the locality and consequently there is unlikely to be a detrimental impact on the townscape. As identified in the HELAA (December 2017 – Appendix B), development in this location *would not impact on any sensitive landscape or townscape but there is a CWS nearby.* **RAG assessment = Green.**
- 4.17 Biodiversity and geodiversity – An arboricultural assessment will be required (on submission of any planning application) to establish (among other) the value of trees on the site boundaries. **RAG assessment = Green.**
- 4.18 Historic environment - There are no archaeological records pertaining to the site according to the Norfolk Heritage Explorer, albeit the LPA are likely to insist on a scheme of investigation, were the site to be allocated. There are no listed buildings in close proximity of the site. **RAG assessment = Green.**
- 4.19 Open Space – The site is not the subject of any ‘open space’ designation(s). Appropriate and

accessible open space will be provided in accordance with local planning policy and guidance in due course and subject to successful inclusion within the context of the Local Plan as an allocation. **RAG assessment = Green.**

4.20 Transport and Roads – There is no evidence to suggest that the development will have an unacceptable impact on the local highways network although engagement with the local highway authority will be ongoing through to allocation/planning application. The HELAA (December 2017 – Appendix B) acknowledges that any impact on local roads could be mitigated. **RAG assessment = Green.**

4.21 Compatibility with neighbouring uses – The proposed development will be entirely compatible with the neighbouring land uses to the south and east. This is a predominantly residential area of the settlement. The HELAA (December 2017 – Appendix B) identifies how *the site relates well to the existing built form.* **RAG assessment = Green.**

4.22 The above ‘suitability’ criteria are just one element of the assessment for the HELAA. In addition to establishing whether sites are potentially suitable for development, sites are also assessed in terms of whether they are ‘available’ for development and whether they are ‘achievable’.

5.0 Assessment of Availability

5.1 A site will normally be considered available by the Council if it is in the ownership of a developer or landowner who has expressed an intention to develop or sell land for development. This site is under the control of a landowner who is actively promoting the site for development within the emerging GNLP process.

6.0 Assessment of Achievability (including viability)

6.1 A site will be considered achievable within the context of the HELAA where there is a reasonable prospect that development will occur on the site at a point in time. A key determinant of this will be economic viability of the site. This will be influenced by the market attractiveness of a site, its location in respect of property markets and any abnormal constraints on the site. It is considered that development on this site is viable, being in an area with considerable demand for both market and affordable dwellings. Furthermore,

there are no abnormal constraints pertaining to the site (i.e. 'reds' in the context of the RAG assessment – see section 4 above).

7.0 Summary

- 7.1 It is trusted that this report has affirmed, in line with both national and local planning considerations, that our client's site (Council Field – GNLP0548) is available, achievable and suitable for inclusion within the context of the next HELAA capacity assessment and as a future allocation within the context of their emerging GNLP.
- 7.2 Parker Planning consider that the site would make a valuable contribute to housing land supply as part of a more logical, coherent and crucially sustainable settlement expansion scheme that would assist in meeting GNLP's growth aspirations for the Village Cluster(s) in the plan period to 2038. The allocation of site GNLP0548 alongside currently 'preferred' site GNLP0608 would mean that there is less pressure on the council to allocate less sustainable sites across the village cluster(s) that are expected (cumulatively) to provide 2,000 dwellings in the plan period.

Appendix A – Site Assessment Proforma

Site Address: Council Field, Lenwade (Gt. Withingham)	
Current Planning Status	'Unreasonable' site emerging GNLP (GNLP0548)
Site Size (Ha.)	1.81
Greenfield/PDL	Greenfield
Ownership	Mr Ivan Moy
Absolute Constraints Check	
SPA, SAC, SSSI or Ramsar	N/A
National Nature Reserve	N/A
Ancient Woodland	N/A
Flood Risk Zone	N/A
Scheduled Ancient Monument	N/A
Statutory Allotments	N/A
Locally Designated Green Space	N/A
At risk from Coastal Erosion	N/A

Development Potential (No. units): 20 homes approximately		
Density Calculator		
Suitability Assessment		
Constraint	Score (RAG)	Comments
Access	Green	See Above
Accessibility	Green	See Above
Utilities Capacity	Green	See Above
Utilities Infrastructure	Green	See Above
Contamination/Stability	Green	See Above
Flood Risk	Green	See Above
Coastal Change	Green	See Above
Market Attractiveness	Green	See Above
Impact	Score (RAG)	Comments
Landscapes	Green	See Above
Townscape	Green	See Above

Biodiversity/Geodiversity	Green	See Above
Historic Environment	Green	See Above
Open Space	Green	See Above
Transport & Roads	Green	See Above
Compatibility	Green	See Above
Local Plan Designations		
Designation	Policy Reference	Comments
Emerging GNLP 'unreasonable' site	GNLP0548	The landowner supports the allocation of site GNLP0548
Availability		
Is the site being marketed?	Yes	
When might the site be available?	Immediately	
Estimated annual build-out rate	Site can be delivered in year 1	
Achievability (including viability)	See above	
Overcoming Constraints	See above	
Trajectory of development	Within year 1	

Barriers to delivery	None
Theoretical Capacity	20 Approximately

Appendix B – Extract HELAA, December 2017

Great Witchingham Suitability Assessment	
Site reference	GNLP0548
Site Area	1.81 hectares
LOCATION	PROPOSED DEVELOPMENT
Council Field, Heath Lane Lenwade	Residential development for an undetermined number of dwellings.
District	Broadland
CONSTRAINTS ANALYSIS	
Access	Green
Accessibility to Services	Green
Utilities Capacity	Amber
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Amber
Market Attractiveness	Green
IMPACTS ANALYSIS	
Significant Landscapes	Green
Townscapes	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Green
Open Space and GI	Green
Transport and Roads	Amber
Compatibility with Neighbouring Uses	Green
SITE SUITABILITY CONCLUSIONS	
<p>This site is at the north of the village, adjacent to recent housing development on two sides, so relates well to the existing built form and has good access to services. Initial highway evidence has indicated that a suitable access could be achieved, and that any impact on local roads could be mitigated. There are no known constraints from utilities infrastructure, contamination or ground instability, and there would be no loss of public open space. The site contains some areas at risk of surface water flooding. Development here would not impact on any sensitive landscape or townscape but there is a CWS nearby and a PROW on the site boundary. Although the site has some constraints, it is considered suitable for the land availability assessment.</p>	
<p>For the purposes of the HELAA capacity assessment this site is considered to be SUITABLE</p>	

Great Witchingham		
Availability and Achievability Assessment		
Availability and Achievability Conclusions		
The proposer has indicated that the site is likely to be AVAILABLE in the following timescale:	Immediately	(timescales have not been specified by the proposer if these fields left blank)
The proposer has indicated that the site is likely to be DEVELOPABLE in the following timescale:	Up to 5 years (by April 2021)	
In terms of site viability, this site has been submitted by a landowner/promoter as viable for the form of development proposed and is assumed to be developable within the plan period in accordance with the timescales above (where given). Further area-wide work on viability typologies will be done as plan-making progresses and will inform decisions on viability.		
Overall Conclusions for Site GNLP0548		
Based on the site suitability analysis it is considered that this site is appropriate for the land availability assessment, subject to any caveats in the Suitability Conclusions.		