



March 2020

GNLP Site Submission

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Information

Client	Mr Nigel Key
Site Address	Land off Mill Road, Reedham, Norfolk, NR13 3TL
Date	March 2020
Local Planning Authority	Broadland District Council

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Report Revision:1

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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.
- 1.3 **Our client welcomes the identification of their site (GNLP3003) as a 'preferred option' for meeting the emerging housing requirement within the settlement of Reedham.**
- 1.4 The intention of this statement is to reaffirm the suitability, availability and achievability of the site at Mill Road, Reedham 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 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 currently preferred for allocation measures 2.27 although it is considered that the wider site area as delineated on the accompanying site plan could be made available for development (potentially mixed-use). The part of the site currently being preferred for allocation within the context of the GNLP is considered to have a capacity of 50 dwellings approximately. The site is next to the existing edge of the village and is bounded by the Wherry Railway Line to the east. The site is agricultural (greenfied) in nature.

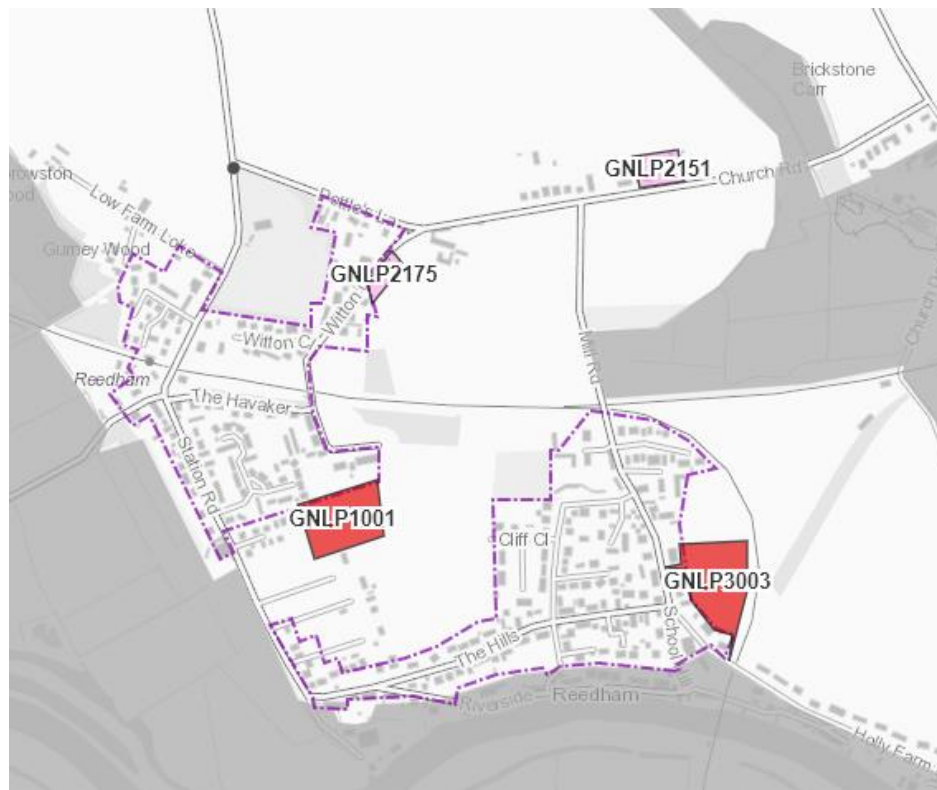


Fig.1 Plan illustrating the position of or client's potential/'preferred' allocation (GNLP3003) in relation to the existing settlement boundary of Reedham. Source: GNLP Reg. 18 Consultation Interactive Map.

3.0 Designations & Constraints

- 3.1 Reedham forms a *cluster in its own right* in the emerging Greater Norwich Local Plan. The GNLP's *Towards a Strategy* document identifies that 2,000 dwellings in total should be provided between all the village clusters. Services and facilities available in Reedham include a primary school, village hall, food shop, pub and train station. The current capacity at Reedham Primary school is classified as green and it is recorded as needing more children.
- 3.2 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.
- 3.3 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.

- 3.4 There are no archaeological records pertaining to the site and there are no historic buildings in close vicinity of the site. Reedham does not have a conservation area.
- 3.5 Reedham has a neighbourhood area designated and the parish council is working on an emerging neighbourhood plan. Any applications that are submitted for development within the parish should take into account the emerging neighbourhood Plan for the area, in line with paragraph 48 of the National Planning Policy Framework.
- 3.6 The site is underlain by a Mineral Safeguarding Area for sand and gravel. Any future development on site will need to address 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, Reedham has been established as a 'Village Cluster in its own right' on the basis of its level of 'Core' and 'Secondary' service provision. The settlement is therefore considered to be a relatively sustainable location for new development.
- 4.2 The settlement of Reedham is also well related to higher order settlements including the City of Norwich which lies just 11 miles to the north-west and Great Yarmouth (6 miles to the east), where there a full range of services and facilities available for current and future residents of the Village Cluster. Reedham is well served by bus services including 73 (Reedham - Acle), 73C (Acle – Great Yarmouth).
- 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 Addendum II January 2020* document (relevant extract to be found at

appendix B):

*There appears to be a single point of access that is relatively narrow at less than 10 metres so further guidance from the Highway Authority is likely to be required. Whilst development could be acceptable, mitigations may be required, and the overall scale of development could be limited....Although there is no footpath Mill Road is relatively lightly trafficked and the site is just 120 metres from Reedham Primary School. Whilst not an absolute constraint to development, the site is adjacent to the Broads Authority administrative area and within the 3,000 metre buffer distance to a SAC, SPA (Special Protection Area), SSSI, Ramsar and National Nature Reserve designations. In conclusion, the site 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:

Part of this site is preferred for allocation due to its immediate proximity to Reedham Primary School and minimal other constraints, however, it is accepted that it is not possible to provide an off-carriageway pedestrian footway to the school.

4.7 It is for this reason that the site now appears as a 'Preferred Option' within the context of the consultation draft GNLP. Whilst Parker Planning welcome this, we have attempted to reaffirm the sites suitability for inclusion within the HELAA and GNLP and undertaken our own RAG assessment, intended to accord with the combined Authority methodology (2016).

Potential Site Constraints

4.8 Access to site – There is currently a single point of access that is relatively narrow at less than 10 metres so further guidance from the Highway Authority is likely to be required through to allocation and a planning application in due course. An additional access might be achievable that could facilitate a delivery of a larger number of dwellings on this site.

RAG assessment = Amber.

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. Indeed, the GNLP is preferring the site for allocation due to its immediate proximity to Reedham Primary School and minimal other constraints. The GNLP acknowledge (Appendix B) that although there is no footpath, *Mill Road is relatively lightly*

trafficked. **RAG assessment = Green.**

- 4.10 Utilities Capacity – Although ‘greenfield’, the site relates well to the existing form of Reedham. There is no evidence to suggest that utilities capacity will be a constraint. **RAG assessment = Green.**
- 4.11 Utilities infrastructure – Although ‘greenfield’, the site relates well to the existing form of Reedham. There is no evidence to suggest that utilities capacity will be a constraint. **RAG assessment = Green.**
- 4.12 Contamination – This is a greenfield site. 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. **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. The site does not lie within any special landscape area or other designated area as defined on the Broadland Development Management Policies document Policies Map (2015). **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 the 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 vicinity of the site and the site does not lie within a Conservation Area. **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. **RAG assessment = Green.**

4.21 Compatibility with neighbouring uses – The proposed development will be entirely compatible with the neighbouring land uses to the west and south. This is a predominantly residential area of the settlement. **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 and 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 reaffirmed, in line with both national and local planning considerations, that our client's 'preferred' site off Mill Road (GNLP3003) is available, achievable and suitable for continuing 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 this Village Cluster and the wider sub-region in the plan period to 2038.

Appendix A – Site Assessment Proforma

Site Address: Land off Mill Road, Reedham, Norfolk	
Current Planning Status	'Preferred' site emerging GNLP (GNLP3003)
Site Size (Ha.)	2.27ha. although the wider site area as shown on the submitted plan is considered suitable, available and achievable.
Greenfield/PDL	Greenfield
Ownership	Landowner
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): 50 dwellings on part of site currently 'preferred' for allocation.		
Density Calculator		
Suitability Assessment		
Constraint	Score (RAG)	Comments
Access	Amber	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 GNLP3003 Site Allocation	GNLP3003	The landowner supports the allocation of site GNLP3003
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 1-5 years	
Achievability (including viability)	See above	

Overcoming Constraints	See above
Trajectory of development	Within year 1-5 years
Barriers to delivery	None
Theoretical Capacity	50 dwellings on currently preferred part of site.

Appendix B – Extract HELAA Addendum II January 2020.

Reedham Suitability Assessment

Site reference: GNLP3003

Site area: 2.27 ha

LOCATION:
Mill Road

PROPOSED DEVELOPMENT:
Residential development (around 50 dwellings)

District: Broadland

CONSTRAINTS ANALYSIS

Access
Accessibility to Services
Utilities Capacity
Utilities Infrastructure
Contamination and Ground Stability
Flood Risk
Market Attractiveness

Amber
Green
Amber
Green
Green
Amber
Green

IMPACTS ANALYSIS

Significant Landscapes
Sensitive Townscapes
Biodiversity and Geodiversity
Historic Environment
Open Space and GI
Transport and Roads
Compatibility with Neighbouring Uses

Green
Green
Amber
Green
Green
Amber
Green

SITE SUITABILITY CONCLUSIONS

This is a 2.27 ha site promoted for around 50 dwellings, accessed directly from Mill Road to the east of Reedham. There appears to be a single point of access that is relatively narrow at less than 10 metres so further guidance from the Highway Authority is likely to be required. Whilst development could be acceptable, mitigations may be required, and the overall scale of development could be limited. The site is next to the existing edge of the village and is bounded by the Wherry Railway Line to the east. Although there is no footpath Mill Road is relatively lightly trafficked and the site is just 120 metres from Reedham Primary School. Whilst not an absolute constraint to development, the site is adjacent to the Broads Authority administrative area and within the 3,000 metre buffer distance to a SAC, SPA (Special Protection Area), SSSI, Ramsar and National Nature Reserve designations. In conclusion, the site is considered suitable for the land availability assessment.

For the purposes of the HELAA capacity assessment this site is considered to be: Suitable

Reedham Availability and Achievability Assessment

Availability and Achievability Conclusions

The proposer has indicated that the site is likely to be AVAILABLE in the following timescale:	Within 1-5 years (by March 2021)	(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:	Within 1-5 years (by March 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: **GNLP3003**

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.