



GNLP REGULATION 18.C CONSULTATION REPRESENTATIONS DOCUMENT
SITE REFERENCE GNLP0485

CAISTOR LANE, CAISTOR ST EDMUNDS



Executive Summary

These representations are submitted to the Greater Norwich Local Plan Regulation 18, Stage C Consultation process on behalf of site promotor, Glavenhill Limited.

The proposed allocation to the north of Caistor Lane, Caistor St Edmund (reference GNLP0485) is shown within these representations and those that have preceded them to be a suitable, available and deliverable development opportunity to provide:

- A notable amount (24ha) of new Green Infrastructure (GI) by way of a proposed country park, as a substantial measure towards meeting a significant district-wide (and county-wide) shortfall which fails to be effectively addressed within both current planning policy and the new Local Plan Regulation 18, Stage C Document.
- A serviced site for a new 420 place primary school and associated car park / drop off area, as a solution to a local shortage in child places, which again is not planned for within the Regulation 18, Stage C Document.
- A serviced site for a new Community Building for Caistor St Edmund and Bixley, adjacent to the proposed school site.
- New on-site open spaces, including play and sports pitches and recreation facilities in addition to the proposed Country Park.
- Additional infrastructure in the form of new foot and cycleway provision, improving accessibility across the local area more generally.
- New housing (180 dwellings) in a range of sizes

and tenures, to add to the existing adjoining settlements and enhance their sustainability whilst enabling the delivery of the above five items without cost to the public purse.

These representations have also demonstrated, contrary to the Council's current spatial strategy (set out in Policies 1 and 7.3 of the Regulation 18, Stage C consultation), that it is both appropriate and necessary (in order to address current unmet schooling and green infrastructure requirements) to allocate this site for the uses proposed.

In direct rebuttal of officer's previous concerns over the environmental suitability of the site, it is also demonstrated that:

- The site can be accessed safely and in a manner that respects the area's local landscape character.
- That the proposed uses can be effectively accommodated within the capacity of local services and infrastructure and new provision made (including utilities, drainage and flood risk and highways).
- Linked to the above, the proposed development offers a solution to overcoming locally identified deficits in Green Infrastructure (GI) and primary school provision.
- The site is well connected to a range of local services and a significant number of dwellings, meaning that it is a suitable and sustainable location for future development. The provision of new development within this location can further improve upon the accessibility of adjoining land

and properties through facilitating improvements to local footpath and cycle links.

The wider socio-economic benefits of the proposed allocation are evidential and justify its early development, not least:

- ~£338,000 Council Tax (based on £1,876.92 (band D for Caistor & Bixley) per dwelling,
- ~£1,262,000 CIL (based on CIL Zone A, £105.70/m² charge over a total 11,940m² of market housing) – of which 15% will be directed to the parish council,
- ~£335,650 New Homes Bonus (based on 180 band D dwellings, assuming 33% affordable provision),
- Delivery of environmental net gains in line with national policy objectives,
- Connecting people with the environment, and the greening of development to improve health and well-being,
- Provision of much needed community and educational infrastructure, enabling social mobility and wider employment opportunities.

In these and all other respects, there is a strong and compelling case for land to the north of Caistor Lane to be allocated within the emerging Greater Norwich Plan.

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1.1 THESE REPRESENTATIONS

This representations report provides comment on behalf of Glavenhill Limited to the Greater Norwich Local Plan (GNLP) Regulation 18, Stage C Consultation process (January-March 2020).

The representations relate to a proposal to the north of Caistor Lane, Caistor St Edmund (GNLP site reference GNLP0485) and respond directly to the Greater Norwich Development Partnership Board's (GNDB) and South Norfolk District Council's (SNDC) decision not to allocate the site for a new country park, primary school and in the order of 180 new homes within the Regulation 18, Stage C Document.

SNDC categorise the site as an 'unreasonable' site for development, stating:

"This site is not considered to be suitable for allocation due to highways constraints. Access from the west of the site would be very detrimental to the rural character of that section of Caistor Lane and the surrounding landscape. It is not clear what access arrangements exist to the east, via the development under construction (ref: 2012/0405). In addition, high amounts of existing commitments and environmental/infrastructure constraints limit the potential for additional new housing in Poringland."

To the contrary, and with reference to additional information contained within this representations report, Glavenhill continue to assert that the site presents a suitable and deliverable development opportunity to deliver:

- 24.0ha (59.3 acres) of new Green Infrastructure (GI) by way of a proposed country park, as a substantial measure towards meeting a

significant district-wide (and county-wide) shortfall which fails to be effectively addressed within the Regulation 18, Stage C documentation.

- A serviced site for a 420 place primary school and associated car park / drop off area, as a solution to the local shortage of child places, which again is not planned for within the Regulation 18, Stage C documentation.
- A serviced site for a new community building for Caistor St Edmund with Bixley (Arminghall).
- New onsite open spaces totalling 2.22ha (5.49 acres), including play, playing pitch and recreation facilities in addition to the proposed Country Park.
- New housing in a range of sizes and tenures, to add to the existing adjoining settlements and enhance sustainability whilst enabling delivery of the above four items without cost to the public purse.

These representations have been provided in response to the Regulation 18, Stage C consultation and to assist officers in their understanding of:

- The proposed site access strategy, including its suitability (in both highway safety and landscape character terms) and its deliverability. These representations confirm the promotor's ownership of additional land adjacent to the eastern access point, ensuring sufficient width and visibility.

- The ability for the proposed development to be accommodated within the capacity of local services and infrastructure.

- The promotor has recently taken 'control' of Skittles Wood to the east of the site, which can be offered as part of the scheme to additional local benefit.

- Linked to the above, the proposed development's solution to overcoming locally identified deficits in Green Infrastructure (GI) and primary school provision, whilst acknowledging the additional potential opportunity for the site to provide a serviced site for a much-needed new community building and sports pitch.

- The ability to deliver improved local connectivity, through providing new foot and cycle links.

- The socio-economic benefits of the proposed development, including its ability to trigger income from the New Homes Bonus and Community Infrastructure Levy (CIL).

These representations also document Glavenhill's comments on the Draft Local Plan Growth Strategy and Strategic Planning Policies, where relevant to the proposed allocation (see Section 2).

1.2 THE SITE

The site adjoins the linked Framinghams, Caistor St Edmund with Bixley (including Arminghall), Upper Stoke and Poringland urban area within the District of South Norfolk.

The site, comprising some 36.8ha (90.9 acres), lies on the north side of Caistor Lane in close proximity to Framingham Earl High School together with its Community Sports Centre. The site is immediately adjacent to longstanding and new residential areas, including the Bennett Homes 'Milestones' site of some 40 dwellings off Norwich Road that is currently nearing completion to the east; plus to the south-east, the David Wilson Homes' development at Brickle Wood Avenue (which in turn leads through to their ongoing 'Clement Gate' development and the new Old Mill Surgery medical centre).

The site is bound to the east by Skittles Wood (under the control of the site promotor), to the south by the rear gardens of existing residential dwellings along Caistor Lane, and to the north and west by countryside, including woodland areas.

The site is located 4.5 km to the south of the City Centre of Norwich, and lies within the former Norwich Policy Area.

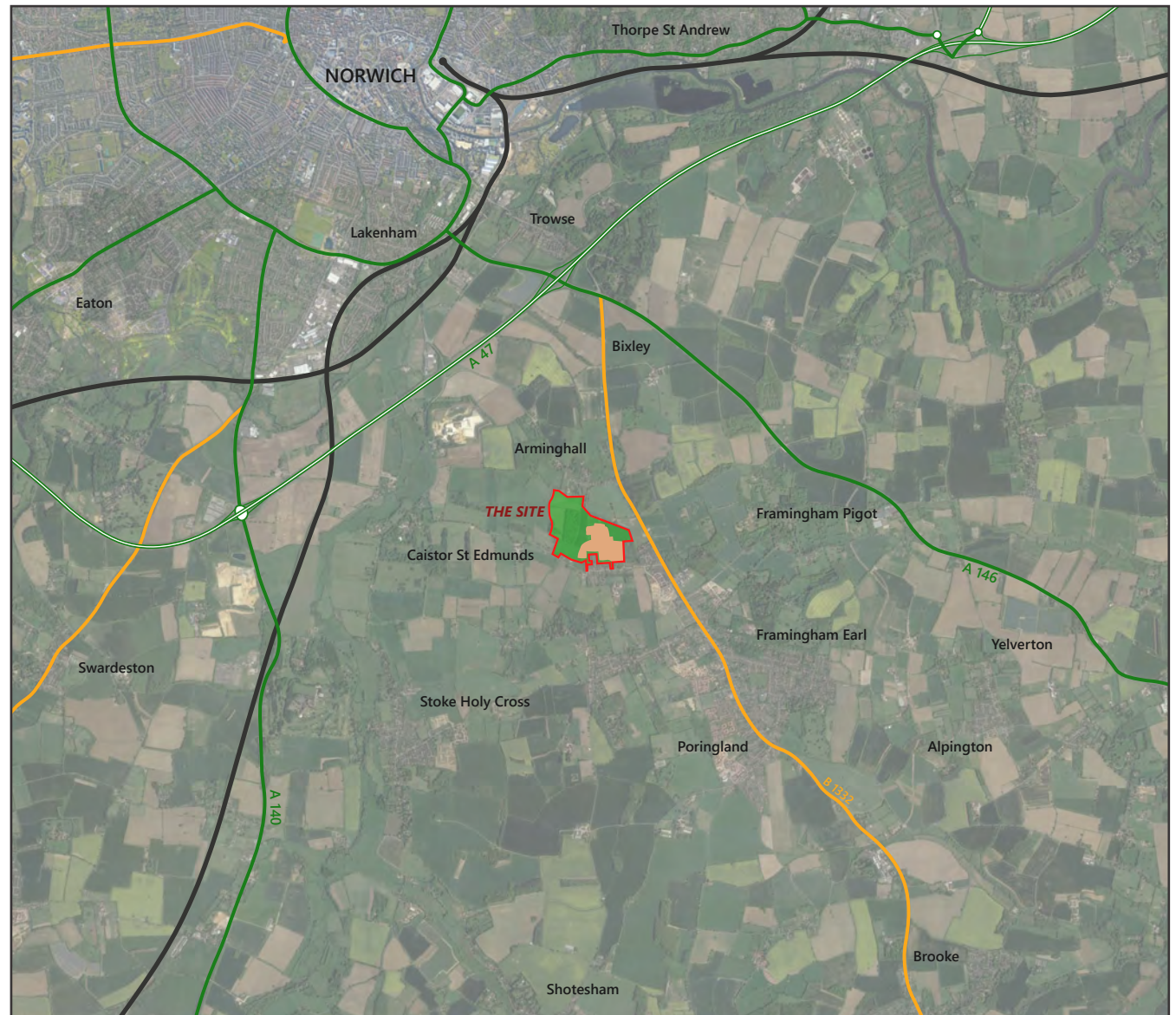


Figure 1: Location of Caistor Lane, Caistor St Edmunds

1.3 PLANNING CONTEXT

The site was first promoted into the GNLP process in response to the 'call for sites' exercise in 2016 and assigned reference GNLP0485. The submission, made on behalf of Glavenhill, suggested that the site was capable of accommodating residential development of approx. 180 dwellings with 24.0ha (59.3 acres) set aside for a new Caistor County Park.

The site was then promoted to the Local Plan Regulation 18, Stage A consultation process in March 2018). The representations at this time suggested that the site could accommodate circa. 300 new dwellings, including affordable housing, and a 24.5ha (60.5 acres) area of permanent green infrastructure in the form of the Caistor Country Park. The scheme was promoted as a highly sustainable mixed-use development that delivered major environmental gains for nature and improved public health and community wellbeing within the Framingham Earl/Caistor St Edmund/Upper Stoke/Poringland urban area. The new Country Park was further promoted as an attractive recreation and leisure destination that was a realistic alternative to visiting The Broads to managing Habitat Regulations issues associated with delivering new large scale planned housing growth across the district and wider Greater Norwich area.

Additional information on the deliverability of the proposed new Country Park was submitted to the GNGB in August 2019. The submitted document confirmed that South Norfolk Council has a serious deficiency of publicly accessible natural and semi-natural public open spaces which is having a harmful effect on the environment, sites of acknowledged importance, SSSI and Natura 2000 sites, including The Broads National Park. It confirmed that the

subject site will deliver a Woodland Country Park of the right scale to be a sufficiently attractive alternative visitor destination.

Glavenhill refined the document with the addition of masterplanning, access and viability information and resubmitted it to the GNDB in December 2019. It is appreciated that these further submissions were at a stage where the GNDB had likely completed the Regulation 18, Stage C Consultation document, and as such, the GNDB's conclusions on the site's suitability are not based on the full suite of information available.

It is hoped that this latest formal submission will assist in clarifying officer's technical queries on the site's sustainability, confirming the extent of its development offer and significant community benefits, not least the ability to secure an appropriate access solution and to clarify the extent of land under the promotor's control.

2.1 RESPONSE TO DRAFT SPATIAL STRATEGY POLICIES 1 AND 7.3

Glavenhill support the inclusion of Caistor St Edmund within the Key Service Centre of Poringland/ Framingham Earl as indicated by draft Policies 1 and 7.3 of the Regulation 18, Stage C consultation Document, and the site assessment documents relating to Poringland, Framingham Earl and Framingham Pigot, including well related parts of Caistor St Edmund & Bixley, and Stoke Holy Cross (hereafter referred to as Poringland / Framingham Earl).

Caistor St Edmund, is, as shown on the opportunities and constraints plan at Figure 7, physically and functionally connected to the wider urban area with its residential population supporting and benefiting from it.

The Poringland / Framingham Earl urban area occupies a considerable number of services and facilities which have deemed the location an appropriate one for additional growth over recent years and continue to support the vitality of the local area.

Key Service Centers such as Poringland / Framingham Earl are identified under draft Policy 1 of the Regulation 18, Stage C Consultation Document as a third-tier settlement, with growth proposed to these areas after the 'Norwich Urban Area', and the 'Main Towns'.

Despite their position in the hierarchy, only 515 new homes are proposed to come forward through new allocations within all nine Key Service Centres. This is considered unsustainable, disproportionate and unjustified.

With specific reference to draft Policy 7.3 of the Regulation 18, Stage C Consultation Document, Glavenhill object to the Council's decision not to allocate any additional sites for residential development within the Poringland / Framingham Earl Key Service Centre. This decision appears to be neither justified or positively prepared, nor to have been sufficiently tested and is therefore considered 'unsound'.

To the contrary, and as demonstrated in later sections of these representations, the settlement and its existing services can accommodate additional development and in the case of the Land to the North of Caistor Lane can, through its allocation, actively assist in the provision of new infrastructure, including a new Primary School, which Norfolk County Council as the Local Education Authority confirm is required; a site for a new community building and playing pitch, which the Parish Council have requested; and a Country Park, to meet the needs of the existing population. These needs can arguably only be met in the short to medium term through enabling residential development of the sort proposed at Caistor Lane.

3.1 ACCESS AND HIGHWAYS

The Council has concluded in their assessment of the site (contained in the Draft Local Plan Regulation 18, Stage C Part 2: Site Allocations Document) that:

"This site is not considered to be suitable for allocation due to highways constraints. Access from the west of the site would be very detrimental to the rural character of that section of Caistor Lane and the surrounding landscape. It is not clear what access arrangements exist to the east, via the development under construction (ref: 2012/0405)."

An access appraisal of the site has been undertaken by Rossi Long Consulting to address this point and is included as **Appendix 1** of this document.

In summary, three vehicular access points are proposed for the proposed development as follows:

'Eastern' Access

This access is the most appropriate point of access to the site, since not only is it the closest to the existing settlement of Poringland and is most accessible being directly connected to the existing pedestrian / cycle network on Caister Lane, it provides appropriate visibility.

The proposed access is shown on drawing 191576/CL-01 (see Figure 2) and would take the form of a Priority T-junction connecting to a Type 2 road from Caistor Lane. The access road would have a 6.0m wide carriageway and 3.0m wide shared use foot/cycleway. This can all be accommodated within land within the control of the site promotor, or within highway land.

Internally, the majority of the proposed housing development will be served by a Type 3 loop road, although the proposed school will require a continuation of the Type 2 road to facilitate access by coaches.



Figure 2: Proposed Eastern Access and Foot/Cycleway Extension

'Middle' Access

This access is proposed for emergency and pedestrian/cycle access only. Lockable bollards would be provided to ensure this is used solely by emergency vehicles. Whilst the eastern access alone would be appropriate to serve the proposed scheme, it is considered beneficial to provide a further access for emergency vehicles and non-motorised users.

Initial investigations show that a pedestrian footway link is also possible between the eastern and middle accesses along the northern side of Caistor Lane (i.e. as far as no.81). By utilizing existing highway verge a footway of 1.8m width appears feasible, with local narrowing to 1.5m for a short section. This footway would also provide a beneficial connection to Poringland for existing dwellings on Caistor Lane.

The proposed access and footway arrangements for the middle access are shown on drawing 191576/CL-02 at Figure 3.

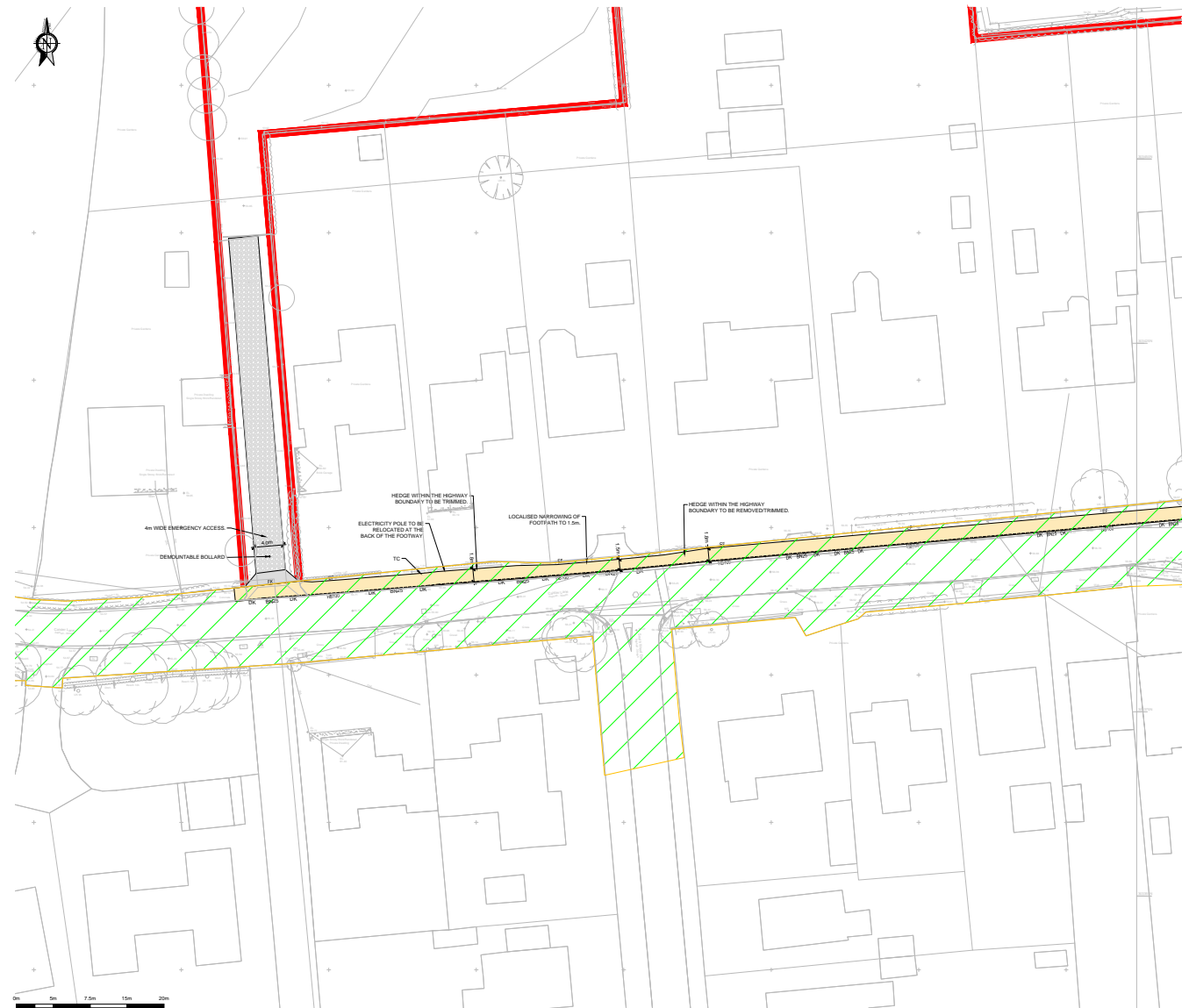


Figure 3: Proposed Middle Access

'Western' Access

It is proposed that this access is only used for access to the car park for the proposed country park. Internal pedestrian and cycle links can be provided from this area of the site to connect to the proposed eastern access.

Due to its location (see section on landscape character) and its proposed use, it is intended that the western access road would take the form of a 4m wide informal road. This would be tarmacked for the first 15m to accord with NCC Highway's requirements, but would be treated informally thereafter.

As shown on Figure 8 (illustrative masterplan) and as advised by Lanpro as landscape consultants, new native hedge-planting will be provided behind the visibility splays.

In association with this proposed access point, it is proposed to extend the existing 30mph speed limit from its existing location on Caistor Lane to the western end of the visibility splay for the western access, to ensure that vehicular speeds past the accesses are appropriate. Further traffic calming measures can be provided as considered appropriate.

Links would also be provided from the western access to the existing Boudicca Way footpath (see illustrative masterplan at Figure 8).

The proposed access arrangements for the western access are shown on drawing 191576/CL-03 at Figure 4.

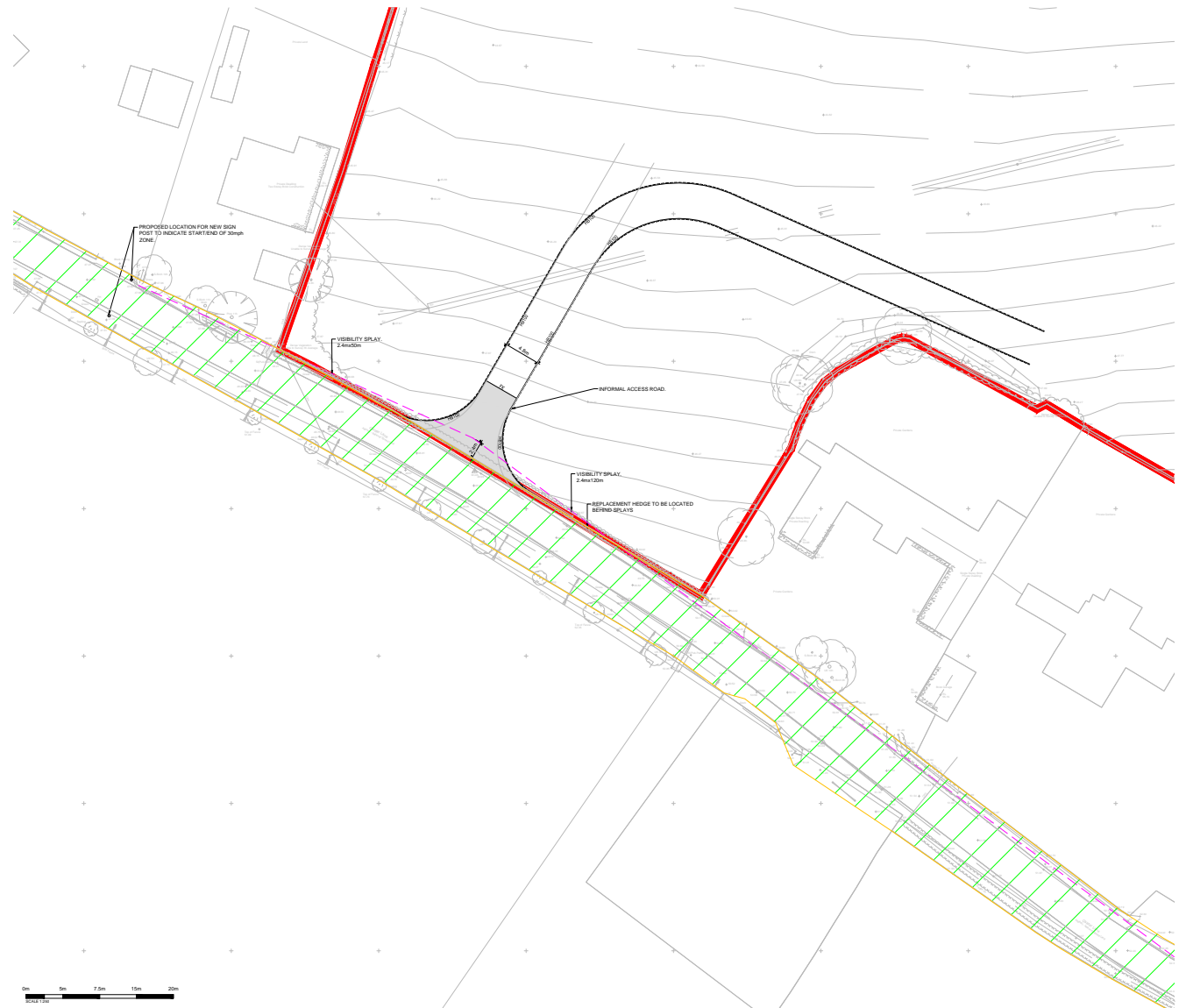


Figure 4: Proposed Western Access

Site Accessibility

The site is well positioned and an appropriate location for a new primary school and a community building being within in a highly accessible location with good access to the settlement of Poringland.

The majority of existing dwellings and services within Poringland are located along Norwich Road and The Street to the south of the site. Therefore, by providing safe, convenient pedestrian and cycle links to this 'corridor', existing local residents will have a simple, safe route to the proposed facilities.

The proposed residential population will also have good access to the existing commercial facilities located within the village, thus supporting their continued vitality.

In terms of connectivity to public transport facilities, existing bus stop facilities are provided on Norwich Road adjacent to the junction with Caistor Lane, within 500m of the proposed eastern access. From these bus stops regular services are provided to Bungay and stops in between to the south, and Norwich city centre to the north.

It may also be possible, through the proposed development, to enable access for pedestrians/cyclists through to the eastern adjoining 'Bennet Homes' site and also through Skittles Wood to the south-east (which in turn connects into 'Highland'), and possibly 'The Ramblers' estate – all of which connect back to either Caistor Lane or Norwich Road.

These potential points of access along with the proposed 3.0m wide foot/cycleway facilities on Caistor Lane will connect the site to existing foot and cycleway facilities.

Thereafter, there are existing appropriate foot/cycleway facilities to Framlingham Earl High School and along Norwich Road to the north and Poringland to the south. Indeed, Framlingham Earl High School and Sports Centre

is within 700m walking distance from the site's eastern proposed access, with a shared pedestrian/cycle link provided all the way from Caistor Lane to the centre of Poringland.

The site's accessibility is summarized on drawing 191576/CL-04 at Figure 5.

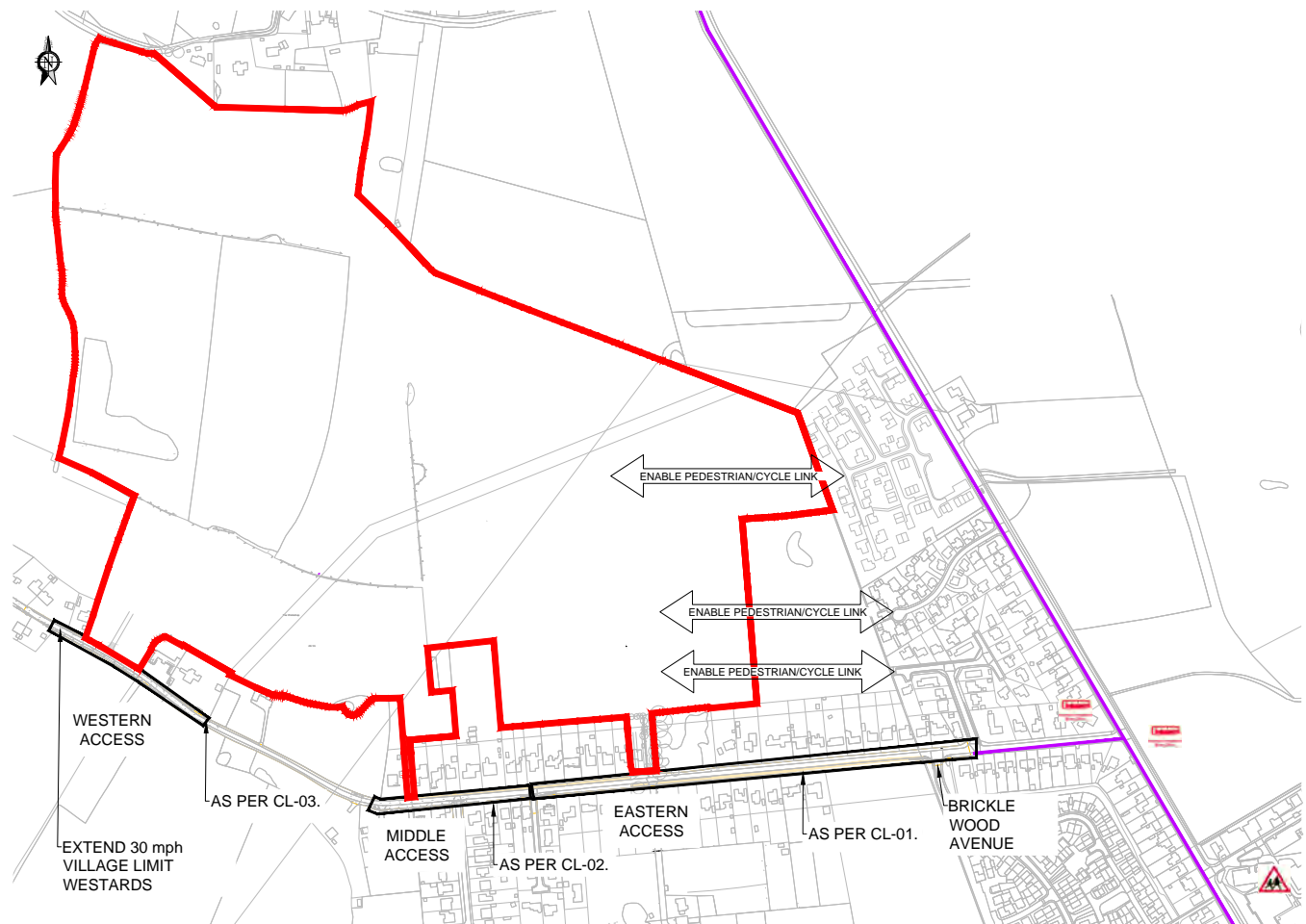


Figure 5: Proposed Western Access

3.2 LANDSCAPE CHARACTER

South Norfolk District Council has referenced the alleged landscape impact of the proposed western access point to the proposed allocation site as a reason for not allocating the site.

Specifically, the Council has suggested that:

“Access from the west of the site would be very detrimental to the rural character of that section of Caistor Lane and the surrounding landscape.”

In response, Landscape Architects, Pro:works have reassessed the potential impact of the western most access point on local landscape character and have made a series of recommendations on its potential treatment and positioning to help mitigate any potential effects.

Their assessment and recommendations are documented as follows:

Current Views

As seen in Plate 1, (see Figure 6 for plate/viewpoint locations) the character of Caistor Lane is contributed to by a mixture of rural and suburban features. Caistor Lane exhibits rural features such as narrow grass verges, and there is an absence of pavements, street lighting and kerbs, respectively (with the exception of where private driveways have been created). It also features low native hedgerows.

However, several suburban characteristics have been introduced alongside these rural features such as parallel electricity pylons (running both side of the Lane), close board fencing, visible in short range views from the highway; and the introduction of areas of non-native Leylandii hedging abutting the highway verge (see Plates 2 and 3 overleaf). Due to the introduction of several suburban elements, it cannot be said that Caistor Lane has an ‘unspoilt’ rural character, but rather it is semi-rural

in character, transitioning to suburban in character some 300m to the east where a 30mph speed limit marks the settlement edge.

Suggested Design Approach

The new access should be designed to be discreet and to minimise the introduction of further suburban features to Caistor Lane, such as kerbing and lighting.

The proposed access drawing at Figure 4, shows that some hedgerow removals are necessary to create the correct visibility splays. These should be replaced and reinforced at an early stage with an enhanced species-rich mix of native shrubs, set back behind the required visibility splays (see Figure 4 for annotated site access drawing).

The materials palette to create the access should be rural and informal in appearance to give the aesthetic of rural farm track used for field maintenance. The use of self-binding gravel or reinforced grass could be considered. Areas of long grass and meadow to be created either side of the access track, would obscure views of the access track from a distance, whilst keeping landscape views open as viewed from the Boudicca Way (see Figure 8).

This access will provide access to the proposed country park car park only and as such does not need to be ‘domestic in appearance’.

Furthermore, and in order to minimise its visibility from the surrounding landscape, the parking area will be located away from the Boudicca Way to the east behind existing properties and screened from view by a dense, informal arrangement of trees and scrub or hedgerow to blend in with the surrounding landscape (see proposed illustrative masterplan at Figure 8). This could be a linear parking arrangement so as to keep views as open as possible.

Conclusion

Overall, the aforementioned design measures would minimise the impact of creating a new entrance on the character of Caistor Lane and the surrounding landscape.

Whilst not raised as a concern or area for review by South Norfolk in their assessment of the proposed allocation, Glavenhill has also demonstrated on the illustrative masterplan how the positioning of development areas and open spaces and the provision of substantial new planting along the boundaries of the site can assist in assimilating the proposed development within the surrounding landscape and minimising visual and landscape impacts (see Figures 7 and 8).



Plate 1: Caistor Lane looking west at the approximate location of the proposed country park site entrance.



Plate 2: Caistor Lane looking east, photo taken from 130m east of the proposed Country park entrance showing Leylandii hedging to property on opposite side of Caistor Lane.



Plate 3: Caistor Lane looking east, photo taken from 85m west of the proposed Country park entrance showing Leylandii hedging and kerb edging to private driveways.



Figure 6: Current Landscape Views and Viewpoint Locations

3.3 CAPACITY TO ACCOMMODATE DEVELOPMENT

The Council has suggested in their commentary on all proposed allocation sites within the Poringland/ Framingham Earl Key Service Centre that:

“...high amounts of existing commitments and environmental/ infrastructure constraints limit the potential for additional new housing in Poringland.”

It is this view that has led the Council to conclude that the Key Service Centre should not take any new additional growth and that there should be no additional sites allocated, beyond existing commitments.

In objection to this strategy (set out under draft Policy 7.3), Glavenhill demonstrate that the proposed development at Caistor Lane can be effectively accommodated within the environmental capacity of the local area. Furthermore, and contrary to the Council’s view, there are no social infrastructure constraints precluding new development at the site, or perhaps more importantly, that the proposed development cannot solve through the provision of serviced land for new facilities where needed.

These conclusions are explained more fully within the following section and with reference to technical studies that have been undertaken by third party consultants.

Health Facilities

An assessment of local Primary Care Provision within the Caistor St Edmund, the Framinghams and Poringland area has been undertaken by Wheatman Planning Limited and is included at **Appendix 2** to this report.

The assessment examines various parameters, including the level of GP provision against the number of registered patients for the medical practices serving the area in order

to understand whether there is capacity within the local provision to accommodate the additional residents that the development may deliver.

The assessment has concluded that the Patient GP ratios for the local practices are very favorable when compared to other surgeries in other Greater Norwich Key Service Centres, the National Average and the South Norfolk CCG averages and as such there is no evidence of a lack of local GP provision.

| Practice Location & Reference | No. of Patients | No. of GPs | No. of GPs (FTE*) | Patients/GP Ratio |
|---|-----------------|------------|-------------------|-------------------|
| Acle (D82104) | 9,291 | 8 | 6.10 | 1,523 |
| Blofield (D82080) | 7,027 | 8 | 4.00 | 1,757 |
| Brundall (D82080) | 8,064 | 4 | 3.30 | 2,444 |
| Hethersett (D82064) | 20,357 | 0 | 0.00 | 2,262 |
| Hingham (D82085) | 6,405 | 6 | 3.90 | 1,642 |
| Loddon (D82006) | 8,727 | 8 | 6.50 | 1,343 |
| Long Stratton (D82037) | 11,152 | 7 | 6.90 | 1,616 |
| Poringland – Heathgate (D82078) | 9,598 | 7 | 5.75 | 1,669 |
| Poringland – Old Mill & Millgate (D82036) | 8,355 | 8 | 7.00 | 1,194 |
| Reepham & Aylsham (D82030) | 9,047 | 4 | 3.70 | 2,445 |
| Reepham – Market Surgery | 9,746 | 9 | 5.50 | 1,772 |
| Wroxham (D82025) | 9,017 | 6 | 4.30 | 2,097 |

Table 1: Comparison with Medical Practices in Key Service Centres
*FTE: Full Time Equivalent

Looking at the ratio of patients to GPs for other surgeries in Key Service Centres, these range from 1,343 (Chet Valley Medical Practice, Loddon) to 2,445 at the Reepham and Aylsham Medical Practice. The Old Mill and Millgate Medical Practice in Poringland has the lowest ratio of all the KSC settlements.

Education Facilities

There is a known and documented unmet need for a new Primary School for the Poringland / Framingham Earl Area.

Norfolk County Council has acknowledged the need most recently in their consultation response to the Poringland Neighbourhood Plan (Regulation 16) Consultation (September 2019) as follows:

“The neighbourhood plan mentions that school expansion is necessary as there are pressures for school places for local children. But it should be noted that there are constraints at the existing school site and it is unlikely that it can be expanded. It is likely that primary school place demands will continue, therefore, the neighbourhood plan should include wording referencing the following: the neighbourhood plan supports the Local Authority in providing a new school to deliver additional primary school places for Poringland.”

A strategy to address this need was presented to Norfolk County Council’s Cabinet on 13 January 2020. Members endorsed the County Council’s Schools Local Growth and Investment Plan which acknowledges the need for new provision within Poringland.

Whilst the need is acknowledged and a plan for investment agreed, there remains an unmet and urgent need for the County Council to secure a suitable site for the school.

The proposed allocation site at Caistor North is well located within easy walking and cycle distance of the local population and can provide the necessary land to accommodate a new serviced site.

The proposed site can be fully funded through the provision of 180 dwellings on site and with no additional cost to the public purse.

With reference to the proposed illustrative masterplan at Figure 8, the school site can be:

- Located within easy walking and cycle distance of and on a safe route from, existing and future housing.
- Supported by a drop-off pick up area within the site which can be located away from residential properties on Stoke Road in order to minimise impacts on residential amenity.
- Positioned adjacent to any additional proposed community facilities, including a new Community Building and playing pitch provision to create a new community hub and to allow for sharing of services.
- Located within areas of new greenspace and planting to create a beneficial and healthy environment for pupils and staff, whilst encouraging children to be closer to nature in direct response to Norfolk County Council's Draft Environmental Policy (25 November 2019).
- Delivered as an early phase of development.

Green Infrastructure

1. Country Park

Draft Strategy

The National Planning Policy Framework (the NPPF) places great weight on protecting and enhancing the natural environment. It seeks to ensure that development not only avoids harm to natural environmental assets but also encourages Local Plans to actively protect, promote and enhance biodiversity so that development results in net gain (paragraph 174).

An Interim Habitats Regulations Assessment (HRA) has

been published alongside the Local Plan Regulation 18, Stage C Consultation Document. This deals specifically with the potential impact of the draft Local Plan Growth Strategy on designated ecological habitats, including the Broads and the Norfolk Coast in accordance with the NPPF.

The HRA identifies a range of mitigation measures that may assist in alleviating recreational pressure from new housing sites identified in the Regulation 18, Stage C Consultation Document. These include (i) the provision of new, alternative green space (referred to in the HRA as SANGS) and (ii) a program of improvements to existing areas of infrastructure. The HRA confirms that the SANG could take the form of a new country park containing woodland and waterbodies.

This need for additional, useable and attractive green infrastructure within Greater Norwich in order to mitigate proposed growth is not a new one. The Greater Norwich Development Partnership (GNDP) undertook an Open Spaces Indoor Sports and Community Recreation Assessment (OSISCRA) using Planning Policy Guidance 17 (PPG17) assessment methodology in September 2007.

This OSISCRA concluded that there was a requirement in 2007 to deliver 87.5 sqm of combined formal, seminatural, amenity, play, sports and outdoor spaces per person resident in South Norfolk Council area. The OSISCRA went on to conclude that South Norfolk Council did not have a large enough network of public open spaces (at the start of the adopted Joint Core Strategy review) to meet the needs of the District.

Since 2007, this Habitat Regulations problem within South Norfolk has worsened due to large scale housing growth and the Council's failure to implement a strategy to deliver new natural and semi-natural green spaces to manage this impact.

Whilst the current Joint Core Strategy identifies the potential to create a new country park at Bawburgh Lakes

to mitigate the impact of its growth strategy, this site remains undelivered. The Joint Core Strategy for Norwich, Broadland and South Norfolk Annual Monitoring Report strategy 2016-2017 published April 2018 (AMR) has since confirmed that there has been no net increase in the amount of natural and semi-natural open spaces delivered within the South Norfolk area since the 2007 assessment and thus, the impact of the existing Local Plan growth strategy remains unmitigated.

Despite this and the requirement for new SANGs to mitigate the additional recreational pressure to be created by the emerging Local Plan, there is no site identified within the Regulation 18, Stage C Consultation Document for a new Country Park. To the contrary, footnote 74 of the Regulation 18, Stage C Consultation Document defers consideration of potential sites for a new Country Park to the Regulation 19 stage.

In the absence of any identified deliverable sites for a Country Park within the Regulation 18, Stage C Consultation Document, draft Policy 3 requests that new development provide onsite infrastructure as necessary. In addition, and rather than allocating sites, the plan suggests that new country parks can be identified through green infrastructure strategies and be funded in the most part, by CIL.

Glavenhill Limited contend that the GNDB's approach to the natural environment as set out in Policy 3 of the Regulation 18, Stage C Consultation Document, specifically the lack of any discernible or deliverable site for a new country park, is 'unsound'.

Glavenhill request that before any further strategic scale growth can be planned through the Greater Norwich Local Plan, that South Norfolk Council establish a proposal for a realistic and deliverable new network of SANG's. This could be achieved in part, through the allocation and early release of the Country Park at Caistor Lane.

A Solution

The proposed woodland Country Park at Caistor Lane can be delivered at a scale and in a form that ensures its attractiveness to new visitors, thus diverting visitors away from The Broads and existing Natura 2000 sites, SAC's and SSSI's present within the District.

The suitability of the proposed allocation site for a new Country Park and the characteristics and form of the Park when delivered, have been described in detail within previous representations submitted on behalf of Glavenhill Limited to the GNGB in August 2019.

However, in summary and with reference to the proposed illustrative masterplan at Figure 8, the new Country Park at Caistor St Edmund will:

- Be delivered on a site of unique and beneficial character. Its position within a cluster of ancient woodland sites, less than 3km across, creates a one-off opportunity to deliver a further woodland habitat to link and buffer these sites.
- Be a mosaic of woodland and grassland habitats interspersed by ponds, some of which already exist,

but would be restored; and some of which could be designed to make use of surface run-off. In this respect the developer aspires to deliver a water positive housing development where suitable surface and roof waters will be captured and used to manage the Woodland County Park.

- Contain a mixture of surfaced and unsurfaced paths to give site users a choice between wheelchair and pushchair accessible routes and a 'wilder' walking experience. Benches and tables would also be provided to create seating areas.
- Include a woodland belt to be planted around the entire site periphery in order to maximise connectivity with woodland habitats in the surrounding area.
- Deliver a minimum of two pedestrian links with the Boudica Way to the west, giving access to walks within the wider countryside, and vehicle and pedestrian links would be created along Caistor Lane to the south of the site.

Importantly, the set-up and long-term maintenance of this new park will be funded by housing delivery across the same site and would not be reliant on the public purse.

2. Play and Sports Provision

The proposed residential dwellings will need to be supported by sufficient onsite recreation and play facilities. The need for new onsite facilities to be generated by the scheme, has been assessed with reference to existing standards set out in the South Norfolk's Guidelines for Recreation Provision in New Residential Developments Supplementary Planning Document ('the SPD').

Whilst the mix of residential units is unknown at this stage, we have assumed for the purpose of calculating the development's open space requirements, a housing mix in line with the current (2017) SHMA identified needs.

The number of dwellings (by house type) has then been compared to the Council's open space standards to generate the amount of open space required (see Table 2).

| Dwelling Type | No. of Units | Open Space Requirement (m ²) |
|---------------|--------------|--|
| 1-bed flat | 7 | 545.8 |
| 2-bed flat | 4 | 3,056.7 |
| 2-bed house | 28 | |
| 3-bed house | 97 | 11,889.3 |
| 4-bed house | 35 | 5,128.4 |
| 5-bed house | 9 | 1,617.3 |
| Totals | 180 | 22,237.4 (2.22ha) |

Table 2: Open Space Requirements



Comparing this to the open space typologies prescribed by the SPD, the proposed development triggers a need for:

- Children’s Play facilities: 2,723 sq. m (0.27ha)
- Older Children / Adult Open Space: 1,362 sq. m (0.14ha)
- Playing Pitches: 7,262 sq. m (0.73ha)
- Informal Recreation: 10,892 sq. m (1.09ha)

The illustrative masterplan at Figure 8, shows how these areas may be effectively accommodated on the site.

3. Step 7 Level Playing Pitch

It has been highlighted by Caistor St Edmund with Bixley Parish Council that there is a need locally for an FA Step 7 level standard playing pitch within the village. In order to meet this need and subject to discussions with the District Council there is the potential for part of the policy required playing pitch provision (64m by 100m or 6,400m²) to be set up as a Step 7 level facility.

In order to meet the relevant standards of a Step 7 Level pitch, the facility would need to have sufficient access to car parking, an emergency access provision and access to toilets and changing facilities which is shown to be feasible on the illustrative masterplan at Figure 8.

Community Building

It is understood that there is a need for a new community hall for Caistor St Edmund with Bixley and that financial contributions towards such a facility may have been secured through recent planning permissions locally, including the Bennett Homes scheme that is currently under construction on Norwich Road and borders the proposed allocation site to the east.

Glavenhill are offering a serviced site for such a facility to the Parish Council or its Trustees as part of the proposed development. The new facility may, with reference to the illustrative masterplan at Figure 8, be beneficially located to close to the site of the proposed primary school, such that any proposed parking and drop off facilities can be shared. It is also suggested that the new hall is best located adjacent to any proposed playing pitch provision so to allow for the sharing of toilet, changing and kitchen facilities (see Figure 8).



Flood Risk and Drainage

An initial (screening) assessment of the site's flood risk and drainage potential has been undertaken by Rossi Long Consulting and is included at **Appendix 3** to this report.

In summary, the assessment demonstrates that the site is situated in Flood Zone 1. This is a low probability flood zone with a less than 1 in 1000 annual probability of flooding. The site is a low risk of fluvial flooding both now and over the lifetime of any development, taking climate change into account.

The site is generally at very low risk of flooding from surface water, however, some low risk flooding has been identified which is directed offsite. An appropriately designed SuDs scheme will be able to manage such flows if they continue to be derived post development and where necessary, surface routing corridors can be reserved for appropriate water compatible uses.

It is likely that the drainage scheme will be a mixture of features using infiltration where it is viable and also utilising positive discharge points. Following the hierarchy of drainage options, off-site discharge of surface water will be required, to be attenuated to the existing greenfield run-off rates. This will ensure that there is no increase in flooding both on or off the site. Where appropriate, space can be made available for the installation of SuDs and the site layout can be developed in response to these features.

The off-site discharge will follow the natural fall of the land into the river catchments already serving the site. The topography allows falls that are conducive for the installation of surface water drainage.

There are no known matters associated with onsite drainage that would prevent the site from coming forward for the uses or quantum specified or that would adversely affect adjacent land.



Utilities

Rossi Long civil engineering consultancy have appraised the utility infrastructure provision at the site, contacting all relevant providers to confirm both presence and capacity: for a new school of 420 places, community building and approximately 180 new homes. Responses from the utility providers are provided at **Appendix 4**. All services are available and without capacity limitation. Rossi Long's findings are as follows:

- Electricity
UKPN confirm the site can be serviced from the local network and will require some local diversions of existing apparatus (common practice with new development, to be picked up as part of overall network planning for the new development).
- Gas
Cadent confirm that the site can be serviced from the local network. There is a high pressure main through part of the site with a no-build easement strip, however, its existence was known prior to the enquiries and has informed the illustrative Masterplan at Figure 8.
- Water
Anglian Water confirm that the site can be serviced from the local network.
- Sewerage
Anglian Water confirm that the site can be serviced from the local network, and gravity flows is envisaged.
- Telecommunications
BT confirm the site can be serviced from the local network.

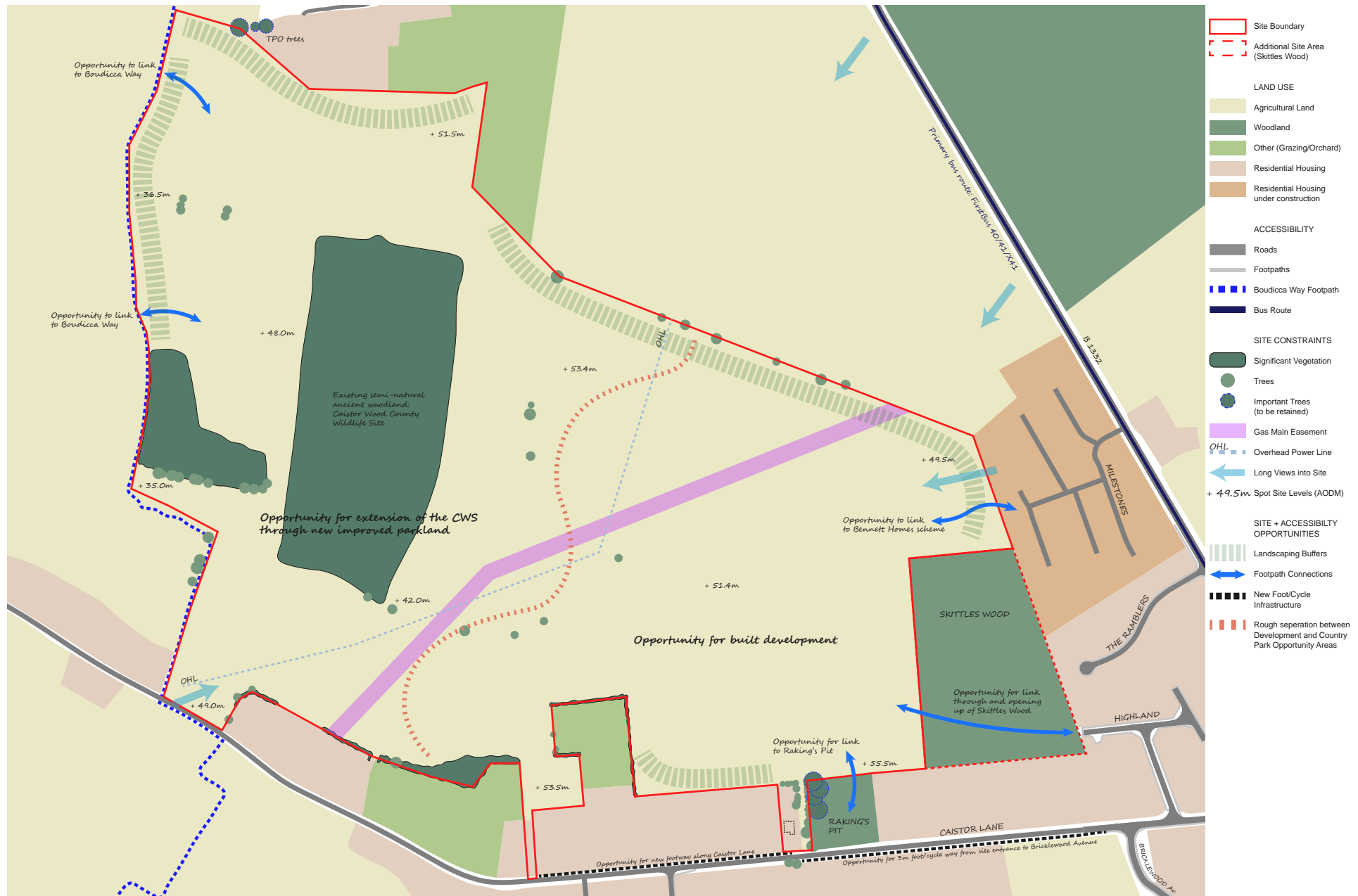


Figure 7: Constraints and opportunities plan



Figure 8: Proposed Illustrative Masterplan – Caistor Lane, Caistor St Edmunds

The proposed allocation provides a viable and deliverable development solution to addressing local and County-wide deficiencies in primary education and green infrastructure. These community facilities are to be enabled by the sale of private housing to also be located within the proposed allocation site.

The financial model that underpins the proposed allocation was set out in representations that were submitted to the GNGB in December 2019. The model is built upon a financial appraisal which effectively demonstrates that the cost of laying out and maintaining the proposed Country Park and the provision of a serviced site for a primary school and adjacent community building can be effectively met through the provision of 180 new homes, of which a policy compliant proportion will be affordable.

A site for 180 homes is a very attractive proposition to a house builder, being of adequate size to attract large as well as medium developers. It is envisaged that the site could be built out within 4 to 5 years, with this location having proven popular with homebuyers. Furthermore, there are no notable abnormal infrastructure or other technical items to affect the site's desirability or delay to commencement of development.

The proposed allocation to the north of Caistor Lane, Caistor St Edmund has been shown within these representations and those that have preceded them to be a suitable, available and deliverable development opportunity which can provide:

- A notable amount (24ha) of new Green Infrastructure (GI) by way of a proposed country park, as a substantial measure towards meeting a significant district-wide (and county-wide) shortfall which fails to be effectively addressed within both current planning policy and the new Local Plan Regulation 18, Stage C Document.
- A serviced site for a new 420 place primary school and associated car park / drop off area, as a solution to a local shortage in child places, which again is not planned for within the Regulation 18, Stage C Document.
- A serviced site for a new Community Building for Caistor St Edmund and Bixley, adjacent to the proposed school site.
- New on-site open spaces, including play and sports pitches and recreation facilities in addition to the proposed Country Park.
- Additional infrastructure in the form of new foot and cycleway provision, improving accessibility across the local area more generally.
- New housing (180 dwellings) in a range of sizes and tenures, to add to the existing adjoining settlements and enhance their sustainability whilst enabling the delivery of the above five items without cost to the public purse.

These representations have also demonstrated, that contrary to the Council's current spatial strategy (set out in Policies 1 and 7.3 of Regulation 18, Stage C consultation), that it is both appropriate and necessary (in order to address current unmet schooling and green infrastructure requirements) to allocate this site for the uses proposed.

In direct rebuttal of officer's previous concerns over the environmental suitability of the site it has also been demonstrated that:

- The site can be accessed safely and in a manner that respects the area's local landscape character.
- That the proposed uses can be effectively accommodated within the capacity of local services and infrastructure and new provision made (including utilities, drainage and flood risk and highways).
- Linked to the above, the proposed development offers a solution to overcoming locally identified deficits in Green Infrastructure (GI) and primary school provision.
- The site is well connected to a range of local services and a significant number of dwellings, meaning that it is a suitable and sustainable location for future development. The provision of new development within this location can further improve upon the accessibility of adjoining land and properties through facilitating improvements to local footpath and cycle links.

The socio-economic benefits of the proposed allocation are evidential. In addition, and through the provision of the enabling housing element, the scheme has the propensity to deliver the following additional socio-economic gains.

- ~£338,000 Council Tax (based on £1,876.92 (band D for Caistor & Bixley) per dwelling,
- ~£1,262,000 CIL (based on CIL Zone A, £105.70/m² charge over a total 11,940m² of market housing) – of which 15% will be directed to the parish council,
- ~£335,650 New Homes Bonus (based on 180 band D dwellings, assuming 33% affordable provision),
- Delivery of environmental net gains in line with national policy objectives,
- Connecting people with the environment, and the greening of development to improve health and well-being,
- Provision of much needed community and educational infrastructure, enabling social mobility and wider employment opportunities.

In these and all other respects, there is a strong and compelling case for land to the north of Caistor Lane to be allocated within the emerging Greater Norwich Plan.

APPENDIX 1

APPENDIX 2

APPENDIX 3

APPENDIX 4

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