

Land North of Tuttle Lane East, Wymondham
Welbeck Strategic Land III LLP
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GREATER NORWICH LOCAL PLAN REGULATION 18 (C) (GNLP00006) REPRESENTATIONS ON BEHALF OF WELBECK STRATEGIC LAND III LLP



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1.0 Introduction

- 1.1 On behalf of Welbeck Strategic Land III LLP, we are instructed to submit representations to the draft Greater Norwich Local Plan Regulation 18 (c) consultation. The representations are split into two, reflecting the two parts of the Greater Norwich Local Plan; the Strategy Document and the Sites Plan.
- 1.2 Whilst comments have been submitted online, the following document provides a complete record of the representations made on behalf of Welbeck Strategic Land III LLP.

PART 1

2.0 Response to the Draft Greater Norwich Local Plan – Strategy Document

QUESTION	RESPONSE
<p><u>6</u></p> <p>Do you support or object to the vision and objectives for Greater Norwich?</p>	<p>Support, with comments</p> <p>The objective of delivering high quality homes that contribute to the delivery of mixed, inclusive, resilient and sustainable communities that are supported by appropriate economic and social infrastructure is fully supported. The approach is fully consistent with the National Planning Policy Framework.</p>
<p><u>9</u></p> <p>Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?</p>	<p>Comments</p> <p>The requirement that sites should only be allocated for housing where, having regard to policy requirements, there is a reasonable prospect that housing can be delivered fully accords with para 67 of the NPPF.</p> <p>Whilst the submission of Delivery Plans as part of a planning application is supported the documents need to recognise that there may be unforeseen material changes in circumstances, which could impact the delivery of an allocation.</p> <p>The Council's approach to providing choice and flexibility in terms of housing growth by accommodating 9% more homes than are needed, along with contingency sites, is, in principle, supported.</p> <p>This buffer will help maintain the supply and delivery of housing, in accordance with the NPPF and specifically the Government's objective of encouraging authorities to consider more growth than required to meet local housing need, particularly in locations where there is potential for significant economic growth, such as the Cambridge Norwich Tech Corridor.</p> <p>However, to guard against non-delivery, particularly in relation to the potential failure of larger strategic sites in the Norwich urban area to come forward, a minimum buffer of 10% should be identified. Indeed, the draft GNL0 states on page 45 that the Regulation</p>

	<p>19 version of the Plan will aim to provide a minimum buffer of 10% (at least 250 further homes), which is likely to be provided through a combination of additional sites proposed through the consultation, and the contingency sites.</p> <p>This approach will provide certainty for stakeholders, including the public, and ensure that the plan is sufficiently flexible to enable it to respond to changing circumstances.</p> <p>Based on the foregoing, it is recommended that the contingency locations are upgraded to committed sites. The identification of contingency sites provides ambiguity as to when and where development may be located. This uncertainty has the potential to undermine the ability to ensure that development during the plan period is delivered in a coordinated manner. More specifically, the potential for Wymondham to be required to accommodate between 100 and 1,100 units provides significant uncertainty, making it difficult for stakeholders, such as Norfolk County Council Education, to identify a clear strategy in relation to infrastructure provision.</p> <p>This is particularly relevant given the under delivery of housing in the Greater Norwich Area between 2011 and 2019, which in locations such as Wymondham has resulted in unplanned and uncoordinated development.</p> <p>The identification of the Norwich Urban Area and Main Towns, such as Wymondham, as suitable locations for the majority of growth within the Greater Norwich Urban Area, given that they provide a range of services and amenities is supported. For example, Wymondham is identified as a strategic employment location that will make a significant contribution to the Cambridge Norwich Tech Corridor and, accordingly, is a suitable location for additional growth. However, within these locations, clear evidence needs to be provided to demonstrate that there is a realistic prospect of development being delivered on the sites, particularly the large strategic allocations which are classed as existing commitments, but are yet to be delivered.</p>
<p><u>11</u></p> <p>Do you support, object, or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?</p>	<p>Support, with comments</p> <p>Whilst there is support, in principle, for the proposed approach to infrastructure, particularly the need for key stakeholders to work collaboratively, the Delivery Statement should make it clear that infrastructure requirements will be proportionate to each development and based on clear assessments of need. Failure to do this will result in certain developments being financially unviable and, therefore, undeliverable.</p>

<p><u>12</u></p> <p>Do you support, object, or have any comments relating to the Climate Change Statement?</p>	<p>Support, with comments</p> <p>The strategic policy is considered to provide a framework to ensure communities developed and infrastructure delivered under the plan will be resilient to the impacts of climate change.</p> <p>The principles of the policy are, where relevant, all capable of being delivered / supported by the proposed development.</p>
<p><u>13</u></p> <p>Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?</p>	<p>Support, with comments</p> <p>The proposed Settlement Hierarchy is, in principle, supported. It is recognised that The Norwich Urban Area and Main Towns, such as Wymondham, provide a range of services and amenities and are, therefore, the most sustainable and suitable locations for the majority of growth within the Greater Norwich Urban Area.</p> <p>Wymondham is identified as a strategic employment location that will make a significant contribution to the Cambridge Norwich Tech Corridor and, accordingly, is a suitable location for additional growth in accordance with the identified settlement hierarchy.</p> <p>Whilst the principle of identifying the Norwich urban area as the focus for most of the identified housing growth is supported, the ability of existing allocations / commitments, as well as certain new allocations, to deliver the scale of growth forecast is, without the provision of clear evidence demonstrating the delivery of certain sites in accordance with criteria contained within the NPPF, questioned. This is highlighted by the fact that the draft Local Plan states at various locations that there is uncertainty regarding the delivery of 1,200 dwellings at the Carrow Works site in Norwich.</p> <p>With specific regard to existing allocations and commitments, the reliance on certain strategic sites is questioned. More specifically, North Rackheath has, in part, been allocated since 2010 and was initially earmarked for delivery in the 2010-2011 Annual Monitoring Report (AMR) during 2013/2014. Since this initial allocation, the scale of growth forecast for North Rackheath has been increased to 3,000 units (Reference GT:16). However, development is yet to start on site. The latest AMR (2018/19) now envisages that development will commence on site in 2022/23. This demonstrate a considerable delay in the delivery of the</p>

site and questions whether, in accordance with the draft GNL0 Delivery Statement, it can be considered to represent a site where there is a reasonable prospect of delivery.

Similarly, the Beeston Park allocation, which is forecast to deliver 3,520 homes has, since its first inclusion in an AMR in 2013/14, been delayed by 4 years.

On this basis, there is considerable doubt as to whether there is clear evidence that large strategic sites that are identified as 'existing deliverable commitments' can be relied on. Similarly, there is, as acknowledged by the draft Local Plan and detailed above, doubt as to whether certain strategic allocations within the Norwich Urban Area, notably Carrow Works (1,200 units), can be delivered.

In addition, whilst the concept of village extensions is, in principle, supported, we would, based on the evidence provided to date, question the ability of a minimum of 1,200 dwellings to be delivered within South Norfolk Village Clusters.

As we understand, South Norfolk Council are preparing a South Norfolk Village Cluster Site Allocations Document. The need to prepare this document has arisen as a result of the previous Regulation 18 consultation stages into the draft Greater Norwich Local Plan not identifying the choice of sites in the village clusters that would address the requirements in those settlements. (See paragraph 2.1 of South Norfolk Village Clusters Allocations Document – Site Assessment Process and Draft Timetable, Agenda Item 5, Regulation & Planning Policy Committee, 18th February 2020.)

The scale of development focused in the village clusters will range from 12 units up to 1 hectare i.e. 20-25 homes. Based on the 48 village clusters identified in Appendix 1 of the above referenced document, it will mean that each cluster has to accommodate the maximum number of units i.e 25, if the minimum of 1,200 units within South Norfolk village clusters is to be provided.

Given that the identified village clusters are, partly due to their rural location, likely to present a range of issues relating to constraints i.e. utilities, flood risk, suitable access, and impact i.e. landscape and biodiversity, it is difficult, particularly without the provision of clear evidence, to see how the scale of growth directed to the South Norfolk village clusters can be justified. In addition, given the scale of the developments in the villages clusters i.e. a maximum of 25 units, they will not be of a sufficient scale to ensure the provision of social and community infrastructure.

On this basis, we suggest that the quantum of growth directed to both the Norwich urban area and the village clusters in South Norfolk cannot, without the provision of clear evidence relating to delivery, be relied on. Accordingly, a suitable proportion of this housing growth should be reallocated to alternative settlements within the settlement hierarchy, which are capable of

	<p>demonstrating that they can deliver housing growth; specifically the allocation of sites that would otherwise be classed as contingency sites.</p>
<p><u>14</u></p> <p>Do you support, object or wish to comment on the approach for housing numbers and delivery.</p>	<p>See comments in relation to Question 13.</p>
<p><u>16</u></p> <p>Do you support, object or wish to comment on the approach to Review and Five-Year Land Supply?</p>	<p>Support</p> <p>The proposed review of the plan 5 years after adoption is fully consistent with paragraph 33 of the NPPF. In addition, we agree that, given the joint approach to the preparation of the draft GNL0, the assessment of 5 year land supply should continue to cover all 3 administrative areas.</p>
<p><u>17</u></p> <p>Do you support, object or wish to comment on the approach to Infrastructure?</p>	<p>Support, with comments</p> <p>The need to support sustainable growth through the provision of infrastructure improvements, such as schools and health centres, is, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery.</p> <p>When considering infrastructure, consideration should be given to whether it is unviable for some of the larger strategic sites, which have high infrastructure costs associated with their delivery i.e. schools and health centres, to pay the Community Infrastructure Levy, in addition to the policy requirements of the Local Plan. The potential for infrastructure costs which are specific to larger strategic sites to be secured by Section 106 planning obligations, in order to ensure that such sites are deliverable and, importantly, that there is certainty regarding the delivery of the infrastructure, should be explored. This approach, which has been adopted by Mid Suffolk District Council, is entirely consistent with the Community Infrastructure Regulations (2019).</p>

<p><u>18</u></p> <p>Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?</p>	<p>Support, with comments</p> <p>The the principle of ensuring that developments are high quality and contribute to delivering inclusive growth in mixed, resilient and sustainable communities, whilst assisting in mitigating and adapting to climate change. To demonstrate the ability to secure these objectives, the preparation of a Sustainability Statement as part of an application for a major development is supported. The use of master planning for the delivery of larger strategic sites, in conjunction with community engagement, and provision of Delivery plans is also supported.</p> <p>Whilst the requirement to ensure the efficient use of land by, amongst other things, providing an indicative minimum density of 25 dwellings per hectare, is supported, the policy, or supporting text, should make it clear that, as well as giving consideration to on site characteristics, consideration will be given to a range of other site / scheme specific issues, such as housing mix, design considerations and the densities of the surrounding area.</p>
<p><u>24</u></p> <p>Do you support, object or have any comments relating to the approach to other strategic sites infrastructure (energy, water, health care, schools and green infrastructure)?</p>	<p>Comments</p> <p>Clarification is required as to the extent of education contributions likely to be required.</p> <p>Paragraph 229 states that <i>“if a new development is likely to generate enough children to fill a new school, Norfolk County Council asks developers for the full cost of building that school.”</i> However, the paragraph goes onto state that <i>“with the current CIL approach locally, only land can be secured through a S106 agreement and the build cost of the new school is claimed through CIL.”</i></p> <p>From discussions with NCC Education and the GNLP it is understood that when a new School is required the situation will remain as existing i.e. the developer will be expected to provide the land for the School, with the construction being funded through CIL. If this position has changed, it will have significant implications for viability.</p> <p>The flexibility provided in relation to provision of new schools (para 231), ensuring that they are only provided as and when they are required is fully supported.</p>

	<p>As detailed in comments made to Question 17, when considering infrastructure, consideration should be given to whether it is unviable for some of the larger strategic sites, which have high infrastructure costs associated with their delivery i.e. schools and health centres, to pay the Community Infrastructure Levy, in addition to the policy requirements of the Local Plan. The potential for infrastructure costs which are specific to larger strategic sites to be secured by Section 106 planning obligations, in order to ensure that such sites are deliverable and, importantly, that there is certainty regarding the delivery of the infrastructure, should be explored. This approach, which has been adopted by Mid Suffolk District Council, is entirely consistent with the Community Infrastructure Regulations (2019).</p>
<p><u>25</u></p> <p>Do you support, object or have any comments relating to the approach to on-site and local infrastructure, services and facilities?</p>	<p>Support, with comments</p> <p>The need to support sustainable growth through the provision of infrastructure improvements is, such as schools and health centres, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery.</p> <p>As detailed in comments made to Question 17 and 25, when considering infrastructure, consideration should be given to whether it is unviable for some of the larger strategic sites, which have high infrastructure costs associated with their delivery i.e. schools and health centres, to pay the Community Infrastructure Levy, in addition to the policy requirements of the Local Plan. The potential for infrastructure costs which are specific to larger strategic sites to be secured by Section 106 planning obligations, in order to ensure that such sites are deliverable and, importantly, that there is certainty regarding the delivery of the infrastructure, should be explored. This approach, which has been adopted by Mid Suffolk District Council, is entirely consistent with the Community Infrastructure Regulations (2019).</p>
<p><u>28</u></p> <p>Do you support, object or have any comments relating to the approach to space standards?</p>	<p>Comments</p> <p>Whilst the general principle of providing development that adheres to space standards is supported, the policy should incorporate a degree of flexibility to ensure that consideration is given to site specific issues, as well as need and financial considerations. For example, there may be circumstances where there is a clear need for homes which fall below the space standards. The lack of flexibility within the policy would prevent this need from being satisfied.</p>

<p><u>32</u></p> <p>Do you support, object or have any comments relating to the approach to Self / Custom Build?</p>	<p>Comments</p> <p>The objective of providing self and custom build is generally supported. However, the proposed threshold (5% of plots on residential proposals of 40 dwellings or more) is questioned, given that it would result in the delivery of substantially more self build and custom build units than for which there is an identified need. For example on large strategic sites, such as that covered by Policy GNLPO337, this would result in provision of approximately 70 self and custom build units.</p> <p>The majority of sites that are identified to meet the housing growth targets are likely to be in excess of 40 dwellings. If, as a very broad calculation, the threshold is applied to only the new allocations identified in the draft GNLPO (7,840 homes), this would result in the provision of approximately 392 units self and custom build units. This is substantially more than the 113 people on the self and custom build register in the Greater Norwich Area (2018/19). The figure would substantially increase were the threshold applied to existing commitments which are yet to granted planning permission.</p> <p>Therefore, the inclusion within the policy that the requirement for self and custom build units will be subject to evidence of need is supported. The policy should, in accordance with the PPG, recognises that as well as the self build / custom build register, additional data from secondary sources should be considered to better understand the demand for self and custom build plots.</p>
<p><u>41</u></p> <p>Do you support, object or have any comments on the approach for the main towns overall?</p>	<p>Support, with comments</p> <p>As detailed in comments provided in respect of Question 13, the proposed Settlement Hierarchy and the identification of the Main Towns to accommodate a significant amount of growth is supported. However, if it becomes evident that sites within the Norwich Urban area cannot deliver the quantum of development envisaged, the Main Towns can accommodate more than the 14% of growth currently identified.</p> <p>As detailed in the draft Local Plan, the Main Towns, such as Wymondham, provide a range of services and amenities and are, therefore, a sustainable and suitable location for the majority of growth. Development in these locations is key to ensuring the sustainability of the rural economy. More specifically, Wymondham is identified as a strategic employment location that will make a significant contribution to the Cambridge Norwich Tech Corridor and, accordingly, is a suitable location for additional growth in accordance with the identified settlement hierarchy.</p>

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Do you support or object or wish to comment on the approach for specific towns?

Object, with comments

We object to the proposed approach to accommodating housing growth in Wymondham.

As detailed in comments made in relation to Question 41, Wymondham, as the second largest settlement in the Greater Norwich area, is located in a highly sustainable location. This is recognised by the identification of Wymondham in the draft Local Plan as a 'contingency' location that can accommodate 1,000 additional dwellings, if delivery of housing elsewhere in the GNLP area does not meet local plan targets.

The principle of identifying contingency locations to accommodate additional growth should locations elsewhere in the GNLP area fail to deliver, is supported. Particularly as it is, as detailed in comments made in relation to Question 13, considered questionable if the scale of growth forecast in both the Norwich Urban area and fringe parishes, as well as the South Norfolk Village Clusters, can be considered deliverable in accordance with the NPPF i.e. clear evidence has not been provided to demonstrate that housing completions will begin on site within 5 years.

Therefore, it is, in our view, highly likely that a contingency site will be required in Wymondham in in order to ensure that local plan targets in relation to housing delivery are met.

In order to ensure that the policies of the Local Plan are unambiguous in terms of how forecast growth will be met, it is recommended that rather than identify a contingency site, land in Wymondham should be allocated for housing development. This will provide certainty for a range of stakeholders, not least the public, and ensure that development, including infrastructure, can be delivered in a planned and coordinated manner.

However, in the event that the decision to identify contingency sites remains, it is, as per the approach adopted in relation to Costessey, recommended that a specific site is identified in Wymondham. As well as ensuring a consistent approach between the policies of the Local Plan it provides certainty, ensuring there is not ambiguity in terms of where growth could be located.

More specifically, the chapter of the draft Site Allocations document relating to Wymondham identifies five Reasonable Alternatives (assuming the proposed garden villages are excluded). These sites occupy a variety of locations around

	<p>Wymondham and range in size from 150 to 1,500 units, providing a significant amount of ambiguity as to where future growth will be accommodated.</p>
<p><u>48</u></p> <p>Do you support, object or wish to comment on any other aspect of the draft plan not covered in other questions?</p>	<p>Turner Morum LLP have, on behalf of Welbeck Land, reviewed the Greater Norwich Local Plan, Interim Viability Study, prepared by NPS group (November, 19) and have identified a number of comments which are outlined below.</p> <p>Whilst there is general support for the approach adopted and the collaborative approach that the GNL0 Team are seeking to adopt, there is concern that the assumptions made within the Viability Study in relation to, amongst other things, sales values, build costs and benchmark land values are too generic and not backed up by comparable evidence. Further evidence on this is provided below.</p> <p>In addition, there is concern that the typologies used within the Viability Study are both too general and do not reflect the allocations within the draft GNL0. For example, the largest size development appraised within the Viability Study is 600 units, notwithstanding the fact that a number of the carried forward allocations / preferred sites are well in excess of this figure. These larger sites are likely to require the more significant infrastructure obligations i.e. primary schools and health centres, so an assessment of viability and the implications for deliverability is key. To ensure a more robust and realistic approach we would suggest that site specific viability studies are undertaken of a selection of the preferred sites of varying sizes.</p> <p>As part of this work, consideration should be given to whether it is unviable for some of the larger strategic sites, which have high infrastructure costs associated with their delivery i.e. schools and health centres, to pay the Community Infrastructure Levy, in addition to the policy requirements of the Local Plan. The potential for infrastructure costs which are specific to larger strategic sites to be secured by Section 106 planning obligations, in order to ensure that such sites are deliverable and, importantly, that there is certainty regarding the delivery of the infrastructure, should be explored. This approach, which has been adopted by Mid Suffolk District Council, is entirely consistent with the Community Infrastructure Regulations (2019).</p> <p><u>General Comments</u></p> <ul style="list-style-type: none"> • The document has adopted average market revenues of <u>£279</u> per ft² for Wymondham, which is considered too high. Based on market evidence the figure should be £250 per ft².

- The affordable rent values are included at 60% of Open Market Values (OPV) averaging £168 per ft² , which we believe is too high. Based on recent evidence we would suggest that this figure should be between 45%/50% of open market value.
- The intermediate units (Affordable Homes Ownership) are included at 75% of OMV averaging £212 per ft², which we believe is too high. Based on recent evidence we would suggest that assuming a shared ownership model, the figure should be between 65% of open market value.
- The Interim Viability Study document is vague about what the Affordable Housing units are intended to be. However, the GNL0 Viability Assessment Paper (2018) is clear that standard intermediate housing are the intended units.
- A figure of only £193,000 per net acre for strategic infrastructure is included whereas, based on experience of similar viability assessments, this should be approximately double. The approach is to include 20% on-top of BCIS for all external and strategic infrastructure costs, although 10% (as a minimum) would be required for plot externals costs – which leaves the remaining 10% for strategic infrastructure costs.
- The GNL0 analysis does not apply contingency or professional fees to the externals works of strategic infrastructure costs – which is a significant figure that would be further increased if strategic infrastructure cost were included
- The allowance for finance costs, which are equivalent to just 1.0% of GDV/ 1.3% of scheme costs, is very low. Based on comparable viability assessments, these costs should be double.

PART 2

3.0 Responses to Draft Greater Norwich Local Plan – Sites Plan

- 3.1 On behalf of Welbeck Strategic Land III LLP, we strongly recommend that the site identified as Reasonable Alternative GNL0006, Land North of Tuttle Lane East, Wymondham is allocated in the Site Allocations Document for residential development. The site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2038.
- 3.2 As detailed in comments made in relation to The Strategy part of the draft GNL0 and specifically the Settlement Hierarchy and the proposed distribution of housing, there is, without the provision of clear evidence, uncertainty as to whether the scale of growth directed to both the Norwich urban area and the village clusters in South Norfolk can be relied on. Therefore, it is, in our view, highly likely that a contingency site will be required in Wymondham in order to ensure that local plan targets in relation to housing growth are met.
- 3.3 In order to ensure that the policies of the Greater Norwich Local Plan are unambiguous in terms of how forecast growth will be met, it is recommended that rather than identify a contingency site, land in Wymondham should be allocated for housing development. This will provide certainty for a range of stakeholders, not least the public, and ensure that development and infrastructure can be delivered in a planned and coordinated manner.
- 3.4 In the event that the decision to identify contingency sites remains, it is recommended, as per the approach adopted in relation to Costessey, that a specific site is identified in Wymondham. As well as ensuring a consistent approach between the policies of the Local Plan it provides certainty, ensuring there is no ambiguity in terms of where growth could be located.
- 3.5 If either of these approaches is adopted it is recommended that GNL0006 is identified as a preferred location for growth within Wymondham. The reasons for this recommendation are set out below.

Wymondham: Comparison of Reasonable Alternatives

- 3.6 The draft GNL0 identifies 7 sites within Wymondham as Reasonable Alternatives. It is assumed that sites, which vary greatly in size from the smallest which is 3.4ha to the largest at 364ha, are considered suitable to accommodate any additional growth / contingency need directed to Wymondham. The suitability of these sites is considered in more detail below.
- 3.7 Two of the identified Reasonable Alternatives sites are too small to accommodate the 1,000 dwelling contingency required; GNL2150, land east of Carpenter Barn and GNL2155, land west of Carpenter Close. These are 6.5ha and 3.4ha and could only accommodate around 150 and 80 dwellings respectively which falls far short of the 1,000 dwellings required. In addition, because of their size they would not deliver the infrastructure improvements necessary to support the additional and existing housing required and they would both represent incremental growth rather than a well-planned strategic contingency for Wymondham.

- 3.8 Whilst the commentary in the draft GNL0 recognises that the sites are well located in terms of access to services, both sites would need to form part of a comprehensive extension in this area with associated infrastructure improvements. Neither site could deliver the necessary infrastructure improvements particularly in terms of a new primary school. In addition, last month (February 2020) a planning application (Ref: 2019/0184) for site GNL02150 was refused by South Norfolk Council due to there being no overriding benefits when having regard to the significant harm identified in respect of the landscape and the Policy harm in allowing unplanned development in a plan led system. For these reasons neither site meets the contingency need and are not considered, therefore, to represent a site that should be considered further.
- 3.9 Two of the Reasonable Alternatives are far in excess of the size required for 1,000 dwellings; **GNL01055**, land west of Hethel and **GNL02168**, land at Park Farm. Both are being promoted as garden villages and would each accommodate in the region of 6,500 new dwellings. The commentary in the draft GNL0 acknowledges this and states that as no new settlement is currently being proposed in this Plan then these two sites are reasonable alternatives for consideration through a future review of the Plan. Given that additional housing will be required in the future this is a sensible strategic approach for the period beyond 2038. Neither of these sites therefore meet the contingency need and should not be considered as Reasonable Alternatives.
- 3.10 GNL00515, land at south Wymondham. This is 132.22ha in size and could accommodate in the region of 1,500 dwellings. It is therefore 50% larger than required for the contingency and is also part of the proposal for the Silfield garden village. The draft GNL0 states that this site, along with adjacent sites, could be considered as a new settlement in a future review of the Plan. In addition, the site is relatively remote from the town centre and other services and less accessible being cut off by the railway line and adding pressure on the main road connection pinch point under the railway bridge. The draft GNL0 highlights that there would be highway concerns (see also for GNL00032) and states that there is already pressure on Silfield Road with the current South Wymondham housing allocation being built. The site also includes land to the south of the A11 which is truncated from the town and remote from Wymondham, separated from services and facilities by the A11 and subject to possible noise from its close proximity to the A11. Other sites in this location have been rejected at an earlier stage for this reason; GNL00200, GNL00402. It also represents further encroachment to the west of the town which would have a greater landscape impact in this more sensitive area. This site therefore does not meet the contingency need and is not considered to represent a suitable location.
- 3.11 **GNL00525R** is located to the east of site GNL00006. As a result it is, when compared with GNL00006, more detached from the Settlement Boundary, as well as being more remote from all of Wymondham's services. Therefore, sequentially it would not logically be the next site to be allocated and in any case it could not be allocated before GNL00006 as it relies on that site's delivery first. Accordingly, GNL00525R should only be considered suitable for development once GNL00006 has been developed. Notwithstanding this, the illustrative masterplan for site GNL00006 has been prepared to ensure that it would not prejudice the ability of site GNL00525R to come forward at a later date.
- 3.12 Waterman Infrastructure and Environmental Ltd has assessed the suitability of site GNL00006, as well as GNL00515 and GNL00525R in relation to accessibility by walking and cycling, in addition to access to public transport, local amenities and education facilities. The Technical Note, a copy of which is attached at Appendix 10. The Technical Note concludes that of the sites considered land North of Tuttle Lane presents the optimal location of competing sites in terms of sustainable access to existing facilities and amenities. This is evidenced by the table below.

Amenity / Facility	Land North of Tuttle Lane				Land at North Wymondham				Land at South Wymondham			
	400m	800m	1,000m	2,000m	400m	800m	1,000m	2,000m	400m	800m	1,000m	2,000m
Wymondham Town Centre				✓							✓ ¹	✓
Wymondham High School				✓								✓ ²
Wymondham Sixth Form				✓								✓ ²
Ashleigh Primary School & Nursery	✓							✓				
Robert Kett Primary School		✓										
Browick Road Primary and Nursery School												✓
Bright Beginnings Nursery				✓								✓
North Wymondham Community Centre		✓						✓				
Wymondham Arts Centre				✓								✓
Kett's Park				✓				✓				
High House Avenue Open Space			✓					✓				
Browick Road Park												✓
Local retail/community facilities	✓							✓				✓
Wymondham Leisure Centre				✓								✓
Wymondham Medical Centre				✓								✓
Wymondham Library				✓								✓
Wymondham Football Club				✓								✓
Waitrose			✓			✓						
Morrisons				✓								✓
B1172 Harts Farm Road / B1135 commercial area				✓				✓				
Ayton Road commercial area												✓
London Road commercial area										✓		
Wymondham Garden Centre	✓							✓				
Access to bus services	✓	✓			✓							✓
Wymondham Station												✓
Wymondham Abbey Station				✓								✓

¹ This shorter distance is achievable if walking over the level crossing.

² Amenity boundaries lie at the extent of the walking distances.

3.13 This leaves **GNLP0006** which has been identified as one of 7 Reasonable Alternatives. The site is 53.68ha and therefore sits between the smallest and largest alternative sites. There is sufficient land to accommodate the majority of the required contingency as well as providing all the required infrastructure improvements. The draft GNLP states that;

‘This site is considered to be a reasonable alternative if additional growth is needed in the towns. The plan includes a 1000 dwelling contingency at Wymondham on unspecified sites. It is well located in terms of schools, public transport and retail opportunities, although more distant from the town centre. This site could be considered as part of a comprehensive extension to the north of Wymondham with associated infrastructure improvements. The site has relatively few constraints but there would be some landscape impacts from breaking the current northern boundary of the settlement.’

3.14 The following text outlines why, **of the reasonable alternatives identified, GNLP0006 is the most suitable to deliver** any additional growth directed to Wymondham over and above the 100 dwellings allocated under GNLP0354 and GNLP3013 in the draft GNLP.

3.15 A substantial amount of work has been undertaken to demonstrate the delivery of the site. As well as the preparation of various technical studies, pre-application discussions have been held with South Norfolk Council and a variety of stakeholders, notably Norfolk County Council highways and education. The following documents, which have, where necessary, been updated since the Regulation 18(a) and Regulation (c) consultation, been submitted in support of this representation;

- Masterplan Vision and Delivery Study, prepared by Bidwells (Appendix 1)

- Landscape and Visual Appraisal, prepared by Bidwells (Appendix 2)
- Arboricultural Appraisal, prepared by Oakfield Arboricultural Services (Appendix 3)
- Ecology Assessment, prepared by Hopkins Ecology (Appendix 4)
- Flooding & Surface Water Management Note, prepared by Cannon Consulting Engineers (Appendix 5)
- Cultural Heritage Desk Based Assessment, prepared by CgMs (Appendix 6)
- Utilities Assessment, prepared by AECOM (Appendix 7)
- Transport and Highway Document, prepared by Basford Powers, Waterman Infrastructure & Environmental Ltd and Sterling Transport Consultancy Ltd (Appendix 8).

Assessment of Deliverability

- 3.16 In accordance with the National Planning Policy Framework's (NPPF) requirement at Paragraph 67 that planning policies should identify a supply of specific, deliverable and developable sites (as defined in its glossary); the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable. This is considered in further detail below.

Suitable

- 3.17 Wymondham is identified in both the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) (2011) and the draft GNL0, as a Main Town. As the largest settlement in South Norfolk it provides a full range of services and amenities to support day to day life whilst also providing access to public transport and employment opportunities. It is a large market town and its services include a high school, primary schools, various food retailers, pubs, library, a doctor's surgery, leisure and recreation facilities alongside a range of employment uses. Wymondham is a settlement which is recognised in the Joint Core Strategy and draft GNL0 as highly sustainable given its location on the strategically important A11 corridor, its good public transport links to Norwich, and its location on the Norwich to Cambridge railway line.
- 3.18 In relation to employment, the draft Greater Norwich Local Plan recognises that Wymondham is well located to benefit from the additional employment opportunities in the Cambridge Norwich Tech Corridor. It also has the well-established Strategic Employment Site, Gateway 11 Business Park, on the edge of the town and good access to the high quality employment opportunities at Norwich Research Park, UEA, NNUH and Lotus Engineering Centre. The employment allocations which were made in the WAAP will be carried forward.
- 3.19 In addition to extant approvals which are being built out, growth of at least 100 dwellings, across two sites, is allocated to Wymondham in the draft GNL0. Furthermore, the suitability of Wymondham for growth, has been demonstrated through the recent residential development around the town and in particular in the northern edge where this site is located adjacent to the Settlement Boundary. This indicates that the site is sequentially a logical extension to the town.
- 3.20 The issue of high school capacity will need to be resolved by the County Council to facilitate further development within Wymondham as the High School is landlocked and there is no room for expansion. This site offers that opportunity and at a meeting in April, 2019 NCC Education Officers

confirmed that this site is the preferred location for additional High School/Sixth Form provision for Wymondham. It is in a sustainable location with good access to the town and large areas of existing housing and closely related to the existing secondary school. This would be in addition to the requirement for a primary school on the site.

- 3.21 The site is located adjacent to existing development and represents a logical extension to the town. It does not encroach into the identified Strategic Gap between Wymondham and Hethersett and is close to key services and facilities. Furthermore, its location at the northern edge of the town ensures that development here would have no impacts on the setting of the Grade I Listed, and nationally significant, Wymondham Abbey, which is identified as one of the key constraints to growth within Wymondham. It will also not impact on the Tiffey Valley which lies to the west and south of the town.
- 3.22 The indicative masterplan submitted as part of this representation demonstrates how the site can be developed to provide approximately 800 units. This would, based on an area of 53ha, give a gross density of 35dph, which is reflective of the local context. The layout proposes two points of access from Tuttle Lane, linked by a main circular road. The illustrative masterplan demonstrates how the site can incorporate open space in accordance with the Adopted Development Plan, whilst also including land for a new primary school, sixth form centre and local centre. Further detail on the layout is contained within the Masterplan Vision and Delivery Study that is submitted in support this representation.
- 3.23 In terms of more detailed site-specific considerations, the Housing and Employment Land Availability Assessment (HELAA) identifies the site as a suitable location for residential development which means it has been brought forward as a Reasonable Alternative. The HELAA confirms through a 'Green' rating, that there are no constraints or impacts anticipated in relation to accessibility to services, contamination and ground stability, market attractiveness, significant landscapes, townscapes, biodiversity and geodiversity, historic environment, open space and green infrastructure or compatibility with neighbouring uses. The impacts rated 'Amber'; site access, utilities capacity, flood risk and transport/roads have been investigated further and the reports accompany this representation in order to demonstrate the suitability of the site. In addition, consideration is given below to impacts raised during pre-application discussions, notably landscape. An update is also provided in relation to ecology, reflecting additional surveys that have been undertaken since the Regulation (b) consultation.

Access, Transport and Roads

- 3.24 SNC have in discussions highlighted the need for access and highway issues to be considered further. Following meetings with NCC Highways and First Bus and discussions with Highways England to understand the highway requirements an additional Transport and Highways Appraisal has been undertaken by Basford Powers/Waterman/Sterling in support of this Representation. Its conclusions are reflected in the up-dated Vision and Delivery Document and on the Masterplan submitted as part of this Representation.
- 3.25 The Appraisal considers additional evidence relating to the site's sustainability in terms of accessibility, considers the site's public transport strategy and the master plan strategy's compliance with emerging transport and transport-related policies as set out in the draft GNLP. The Appraisal then goes on to assess the design feasibility of specific off-Site measures.

- 3.26 As set out in the original AECOM Report a key aim of the proposed development will be to reduce the current levels of reliance on the private car; the 2011 Census showed that 70% of journeys to work from Wymondham were by private car. The accessibility mapping exercise carried out by Waterman concludes that the existing site is well located for access to local services, with local facilities within a 400m walk. Access to the wider area's commuting, employment and education facilities are also within appropriate distances. The opportunities presented by the master plan strategy, its location and access to existing and planned facilities (including the Blue Pedalway) serve to reinforce the Site's overall high level of access by sustainable modes. With the master plan strategy for the site, including the proposed provision of a Local Centre, a primary school and a sixth-form college, supported by a high quality active travel network and increased public transport provision, the levels of accessibility within the site and to other centres will be further enhanced.
- 3.27 It is proposed that two points of access would be taken from Tuttlés Lane East and the meeting with NCC Highways has agreed this in principle. There is good visibility along the site frontage, and these access points would fully comply with current guidance. Both these proposed junctions will incorporate pedestrian and cycle crossing facilities over Tuttlés Lane. It is therefore possible to provide safe vehicular access into the site as confirmed within the report. To support this, it is proposed to provide a 4m wide shared footway/cycleway along the site frontage on the north side of Tuttlés Lane, where this is possible with a Toucan crossing near to Lime Tree Avenue.
- 3.28 Initial engagement with NCC and the main bus operator has identified a preference for development of Tuttlés Lane as the major bus corridor serving both the Site and the existing housing in the locality. Therefore, two bus hubs are proposed on Tuttlés Lane, with pedestrian-friendly links to support access into the site. NCC has indicated its in principle support for the approach proposed.
- 3.29 In terms of the surrounding highway network, some upgrades may be required to cater for the additional traffic likely to be generated by the proposed development and for pedestrian safety. The Appraisal identifies positions for new bus lay-bys and eight positions for junction and crossover improvements and the Appraisal includes drawings to demonstrate these are achievable.
- 3.30 It is clear, therefore, that the site is sustainable in terms of accessibility and neither Access nor Transport and Roads present any significant constraint to the delivery of the site. In addition, with the measures proposed, the site has the opportunity to increase the sustainability of existing residential developments within the locality.

Utilities Capacity

- 3.31 A Utilities Assessment was been prepared by AECOM, in support of the previous Representation and is resubmitted as part of this representation for completeness. It confirms that all the key utilities are available in the locality (gas, electricity, potable water, telecoms and foul sewerage). In relation to capacity, it has not been possible in the timeframe of the current consultation to engage formally with the utilities providers, however, AECOM have undertaken a desktop review and have found nothing to suggest that there are any known capacity issues that would impact on the proposed development. Furthermore, given the scale of the proposed development, it is considered highly unlikely that there would be any capacity issues significant enough to prejudice its viability.

Flood Risk

- 3.32 A Drainage Note was been prepared by Cannon Consulting, in support of the previous Representation and is included as part of this representation. It confirms that the whole site is located within Flood Zone 1 and is therefore not exposed to flooding from overtopping of a Main River or other significantly sized watercourse. In relation to surface water flooding, the majority of the site is at very low risk, but there are localised areas at higher risk associated within the watercourse to the east, and other 'hotspots' within the site. These risks are readily manageable through appropriate master planning, such as the inclusion of low impact flood routes along landscaped corridors. The Drainage Note confirms that groundwater flooding is not a realistic threat, and sewer flooding is not a significant or unmanageable threat. There are, therefore, no flood risk related reasons why the site could not be delivered.
- 3.33 The Drainage Strategy for the site is likely to comprise attenuation and discharge to the local watercourse, given the likely underlying geology. Consequently, the Masterplan incorporates suitably sized attenuation basins.

Landscape Impact

- 3.34 The only other issue raised in the Pre-application consultation with SNDC was the possible impact on the landscape and this was the only issue raised in the draft GNLP assessment. The draft GNLP stated; 'The site has relatively few constraints but there would be some landscape impacts from breaking the current northern boundary of the settlement.' For this reason, a comprehensive Landscape and Visual Report has been prepared to investigate this further.
- 3.35 The Appraisal assesses the landscape and visual baseline conditions and the landscape and visual sensitivity to make a qualitative assessment of the potential landscape and visual effects arising from the proposed development and make recommendations to avoid or mitigate potential adverse landscape or visual effects. These representations have been used to inform ongoing refinement of the design proposals and the development of a masterplan strategy.
- 3.36 The LVA found that the proposed development would cause some adverse effects in visual and landscape terms on critical receptors identified within the study area. These are largely associated with the loss of countryside and the consequential increase of urbanisation on the northern edge of Wymondham. However, it should be noted that there are no statutory landscape designations within the Site that would be adversely effected by the proposal and, on the other hand, distinctive features such as the woodland cover is enhanced by the proposed green infrastructure strategy. Furthermore, adverse visual effects are largely localised to the Site proximity, with changes decreasing as the distance increases.
- 3.37 It is considered that the above design principles (see section 10.1 of the Landscape and Visual Assessment) provide suitable guidance to mitigate the residual effects and achieve appropriate expansion to Wymondham settlement. The illustrative masterplan submitted as part of the representation provides a congruous design response, which is sympathetic to the existing landscape and townscape character.
- 3.38 As outlined above, the HELAA gives a 'Green' rating to all other potential impacts/constraints. Further technical evidence has been obtained on a number of these points, which confirms the HELAA conclusion, and feeds into the Masterplan and Vision and Delivery Document.

Ecology

- 3.39 An Ecology Appraisal has been undertaken by Hopkins Ecology Ltd, February 2020. There are no statutory sites on the site or within 5km and whilst there are two County Wildlife Sites within 1km to the north and north-east the Appraisal concludes that there will be no direct or indirect impact on either.
- 3.40 The site is typical of an intensive arable landscape, and whilst a number of species of conservation concern may be present, any such species will be found in low numbers and the overall assemblages of species will be small. Direct surveys in 2019 did not find any evidence of; great crested newts, roosting bats, water voles, otters, badgers, reptiles and brown hares and they are therefore considered to be absent. Some foraging by five bat species, nesting and foraging bird, hedgehogs and moths were recorded but the assemblage and individual species are considered to be of no more than local importance and minor components of larger populations across the landscape. Usual mitigation should take place during construction; avoiding the nesting season, protecting trees, preventing run-off to the ditch network and further pre-work inspections should take place to confirm the absence of bat roosts.
- 3.41 It is considered that the impacts on the majority of species and any habitat loss can be mitigated via appropriate soft landscaping and scheme design, with the potential to deliver net ecological enhancement. A key enhancement would be the delivery of the green infrastructure corridors identified within the Wymondham AAP as part of scheme design and landscaping.
- 3.42 Therefore, it is clear from the above that the site is entirely suitable for residential and associated development. The Masterplan options contained within the Vision and Delivery Document demonstrate that the site could be developed to accommodate approximately a contingency of dwellings for Wymondham at a density of 35dph, together with extensive open space and green infrastructure, a local centre, sixth form and a primary school should this be necessary. The technical evidence submitted alongside this Representation, together with the Vision and Delivery document, demonstrates that there are no constraints to the delivery of the site.

Availability

- 3.43 The site is currently in agricultural use, and the landowner has entered into a promotion agreement with Welbeck Strategic Land III LLP. The site is available for development and would be delivered in the plan period. Based on the suitability assessment above, there are no site-specific constraints which could preclude the delivery of residential development on the site.
- 3.44 Welbeck Land III LLP prepared and submitted a Delivery Statement to the GNLP Team in May, 19. The Delivery Statement, which is attached as Appendix 9, demonstrated that there is a realistic prospect that housing will be delivered on the site within 5 years of the Local Plan being adopted and that the site could be developed in its entirety during the plan period. More specifically the Housing Trajectory within that document confirmed that based on a site of 800 units, the site would be fully developed by 2031.
- 3.45 The Housing Trajectory below has been updated to reflect the fact that the GNLP is not now due to be adopted until 2022.

3.46 The Delivery Statement also demonstrated that there is no noticeable difference in timescales from securing outline planning permission and starting on site between promoter-led and housebuilder-led sites. It also demonstrated that Welbeck have a strong track record of working in partnership with reputable housebuilders who are proactive in bringing sites forward in a timely manner.

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037
PROGRAMME																
Adoption of Greater Norwich Local Plan																
Submission of Outline Planning Application																
Approval of Outline Planning Application																
Submission of first Reserved Matters																
Approval of first Reserved Matters																
Start on Site																
DELIVERY TRAJECTORY																
Developer 1					50	50	50	50	50	38						
Developer 2						50	50	50	50	50	38					
Affordable Housing						39	39	39	39	39	29					
Cumulative Total					50	189	328	467	606	733	800					

Viable

3.47 Welbeck Land III LLP are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that they are aware of, at this moment in time, that could prevent the delivery of the site. This statement is, however, made in the context of the questions that have been raised in relation to Greater Norwich Local Plan Interim Viability Study (2019). Further discussions are required with the GNLP Team on these matters in order to confirm that the various policy objectives, such as affordable housing and community infrastructure

requirements, can be delivered on site without prejudicing the viability of the site. Welbeck Land III LLP are keen to continue discussions with the GNLP Team on this matter asap.

Summary

- 3.48 As outlined above, the site is suitable, available and viable, and is therefore developable. Housing in this location would represent sustainable development, as defined within the National Planning Policy Framework. Wymondham, as South Norfolk's largest Market Town, and situated on the A11 Tech Corridor as well as the Norwich-Cambridge railway line, is already acknowledged as a highly sustainable location, and a preferred location for growth, and the foregoing text demonstrates that this specific site is a suitable location for further development in all respects.
- 3.49 Economically, the site represents the right land in the right place at the right time. Residential development here in the plan period would support the expanding employment area at Hethel, as well as employment growth within Norwich and at Gateway 11 Business Park, providing high quality and desirable homes within easy reach of these key employment locations.
- 3.50 Socially, the scale of development envisaged is such that it will enable the creation of a strong, vibrant and healthy community, with easy access to existing and planned local services and facilities, as well as on-site provision of a primary school should this be necessary, and extensive Green Infrastructure. A wide mix of dwelling types, sizes and tenures will be provided to meet local needs, and CIL/Section 106 payments will ensure the provision of the necessary health and cultural facilities. The site is located in close proximity to established communities in Wymondham, which should assist in achieving social integration between the existing and new residents.
- 3.51 Environmentally, the site is located close to a wide range of employment opportunities and enjoys good access to a range of sustainable transport options providing easy access to the extensive array of facilities and services available within Norwich and further afield. Residents will be able to meet their day-to-day needs easily and without the need to use their car, assisting in reducing pollution and minimising the contribution to climate change.
- 3.52 We, therefore, strongly recommend that the site identified as Reasonable Alternative GNLP0006, Land North of Tuttle's Lane East, Wymondham is allocated in the Site Allocations Document for residential development of at least 800 units. The site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2038.
- 3.53 This will give certainty and ensure that the policies of the Greater Norwich Local Plan are unambiguous in terms of how forecast growth will be met, it is recommended that rather than identify a contingency site, land in Wymondham should be allocated for housing development.
- 3.54 In the event that the decision to identify contingency sites remains, it is recommended, as per the approach adopted in relation to Costessey that GNLP0006 is identified as the Contingency Site for Wymondham.

APPENDIX 1

MASTERPLAN VISION & DELIVERY STUDY

APPENDIX 2

LANDSCAPE & VISUAL APPRAISAL

APPENDIX 3

ARBORICULTURAL APPRAISAL

APPENDIX 4 ECOLOGY ASSESSMENT

APPENDIX 5

FLOODING & SURFACE WATER MANAGEMENT NOTE

APPENDIX 6

CULTURAL HERITAGE DESK BASED ASSESSMENT

APPENDIX 7 UTILITIES ASSESSMENT

APPENDIX 8

TRANSPORT & HIGHWAYS DOCUMENT

APPENDIX 9 DELIVERY STATEMENT



BIDWELLS

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APPENDIX 1

MASTERPLAN VISION & DELIVERY STUDY

MARCH 2020

MASTERPLAN VISION AND DELIVERY STUDY

LAND NORTH OF TUTTLES LANE EAST, WYMONDHAM



Quality Assurance

Site name: Land North of Tuttlles Lane East

Client name: Welbeck Strategic Land III Ltd

Type of report: Masterplan Vision and Delivery

Prepared by: Jonathan Stewart

Signed:

Date: 11.03.2020

Reviewed by: Martina Sechi

Signed:

Date: 11.03.2020

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1.0

EXECUTIVE SUMMARY

The executive summary gives a high-level overview of the project, outlining the purpose of the document.

1.1 EXECUTIVE SUMMARY

This masterplan vision study proposes a residential development of 800 dwellings and associated public space covering an area of approximately 54 hectares. The site is located in Wymondham, South Norfolk.

The proposed masterplan responds to the sites edge of settlement location to the northern side of Wymondham and incorporates a green boundary to the open countryside to the north. The proposed residential areas face onto the existing urban area of Wymondham to the south.

A series of public open spaces permeate through the housing parcels providing recreational facilities for all residents, including provision of a circular walk along the development edges. Furthermore, the landscape strategy provides opportunities for SuDS and Green Infrastructure (GI) corridors in accordance with the Wymondham and South Norfolk GI strategy.

Pedestrian and vehicular access points are strategically located to maximise connections with Wymondham town and to encourage use by pedestrians and cyclists.

The purpose of this document is to provide evidence that the existing site and its context are suitable to achieve the proposed development and that this can be successfully integrated into Wymondham. This study focuses on maximising opportunities for the site to create a sustainable community that would respect, enhance and complement the existing character of Wymondham and its surroundings.

LEGEND




















	Site Boundary
	Drains / ponds
	Woodland & hedgerows
	PROW
	Site Access
	Main Road
	Secondary Road
	Potential Access Link
	Buffer Planting
	POS
	GI Corridors
	Developable area
	Primary / Sixth Form School
	Local Centre
	Recreational Route
	NEAP / LEAP (400m Walkable Distance)
	Proposed Bus Hub
	Drain / Swale
	Potential Attenuation / Low Point



Figure 1; Masterplan Strategy





2.0

INTRODUCTION

This section provides an overview of the document contents and scope, in accordance with the site assessment and delivery requirements.

2.1 THE DOCUMENT

On behalf of Welbeck Strategic Land III Ltd, this document has been prepared to demonstrate the development potential of a parcel of land north of Wymondham, at Tuttle Lane East. The document begins with a site assessment and leads onto a masterplan vision and delivery document.

The masterplan follows a process of assessment and evaluation to establish site opportunities and constraints, followed by the development of a masterplan strategy.

The document is comprised of the following sections:

SITE CONTEXT:

A description of the site in its local and wider context, highlighting local amenities, including schools, doctors and transport connections. Also, the planning context provides a summary of the planning framework through which the site has been proposed for development, and which policies have been considered as part of the assessment.

BASELINE STUDY:

A photographic study of the site and its context, determining key receptors and identifying the opportunities and constraints of the site; followed by an assessment of the site's mapping data including topographical and flood risk mapping to assess the key considerations and constraints of the site.

DEVELOPING A VISION:

An overview of the opportunities and constraints related to the development of the site, leading to a strategy diagram showing indicative open space, access and a housing area. This is detailed further within a development brief which indicates densities, numbers and area calculation for each developed parcel, in accordance with Local Plan Policy,

CONCLUSION AND NEXT STEPS:

Conclusions and benefits of the site assessment are included in this section, together with the indicative design principles to be applied to the masterplan.



Figure 2; Site Boundary Plan



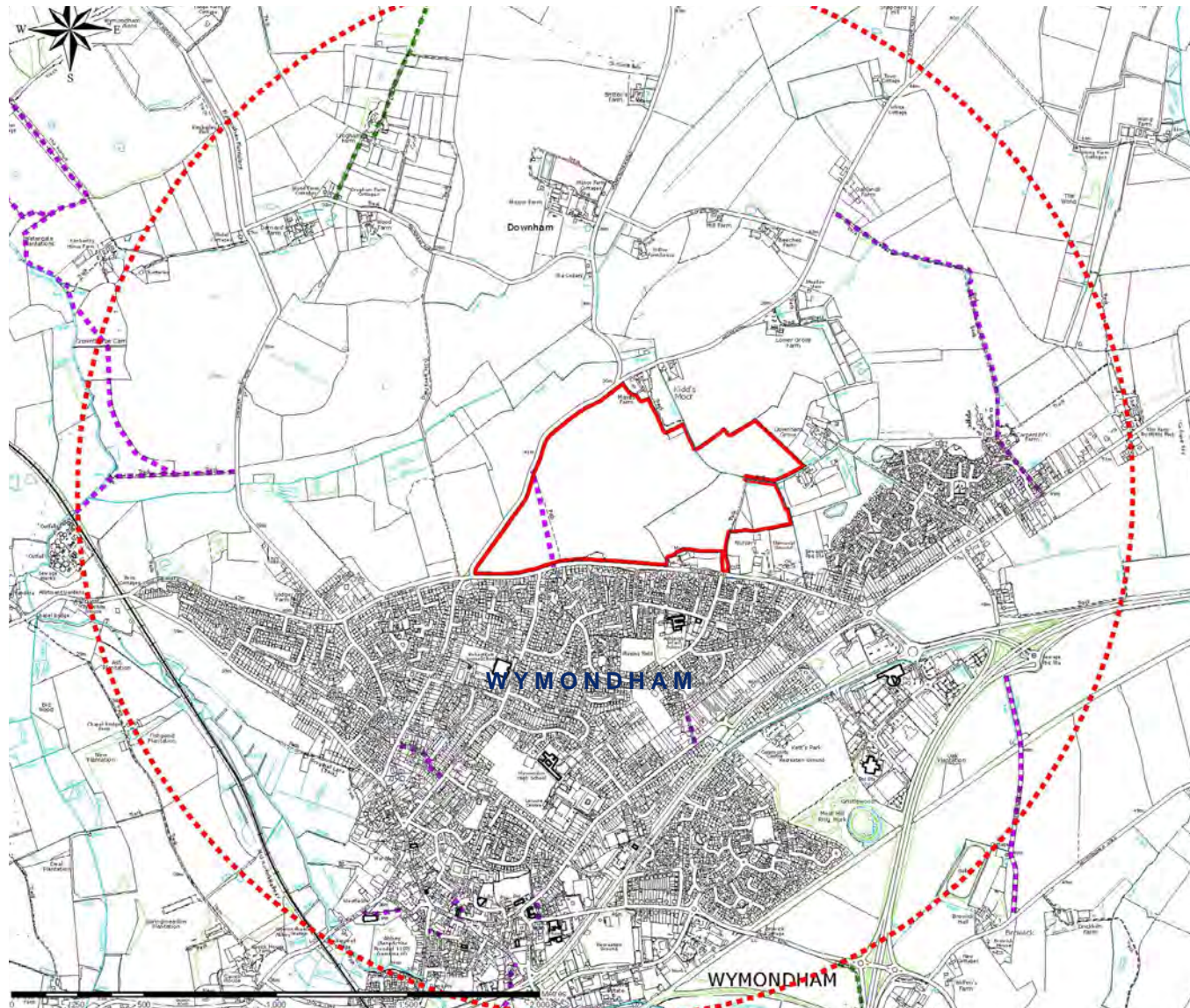


3.0

SITE CONTEXT

This section of the document gives an overview of the site location, local amenities and connectivity.

3.1 SITE LOCATION



The development site covers an area of approximately 54 hectares of land north of Wymondham, off Tuttle Lane East (the B1135), which leads to the A11 dual carriageway.

The site location allows for good connections to Wymondham settlement as well as Norwich. Proximity to the A11 also guarantees access to the wider context including Cambridge.

There is one public footpath connecting Tuttle Lane West to Melton Road that crosses the site area, however the public rights of way network surrounding the site is sparse and lacking connections with the site.

LEGEND

- Site Boundary
- 2km Radius
- Public Footpath
- Bridleway

Figure 3; Site Location



The application site is located close to a range of local services and facilities including a number of schools and a large supermarket, as shown on figure 4 opposite.

LEGEND

- Application Site
- 1km Radius
- 1 Ashleigh Primary School and Nursery
- 2 Robert Kett Primary School
- 3 Wymondham High
- 4 Hope Community Church
- 5 North Wymondham Community
- 6 West England Co-op Foodstore
- 7 Waitrose
- 8 Robert Kett Public House
- 9 Wymondham Rugby Club
- 10 Kett Park Community & Recreation Centre
- 11 Wymondham Leisure Centre
- 12 Business Centre
- Bus stops with routes to Norwich, Broadland Business Park and Norfolk & Norwich University Hospital

Figure 4; Local Services and Facilities

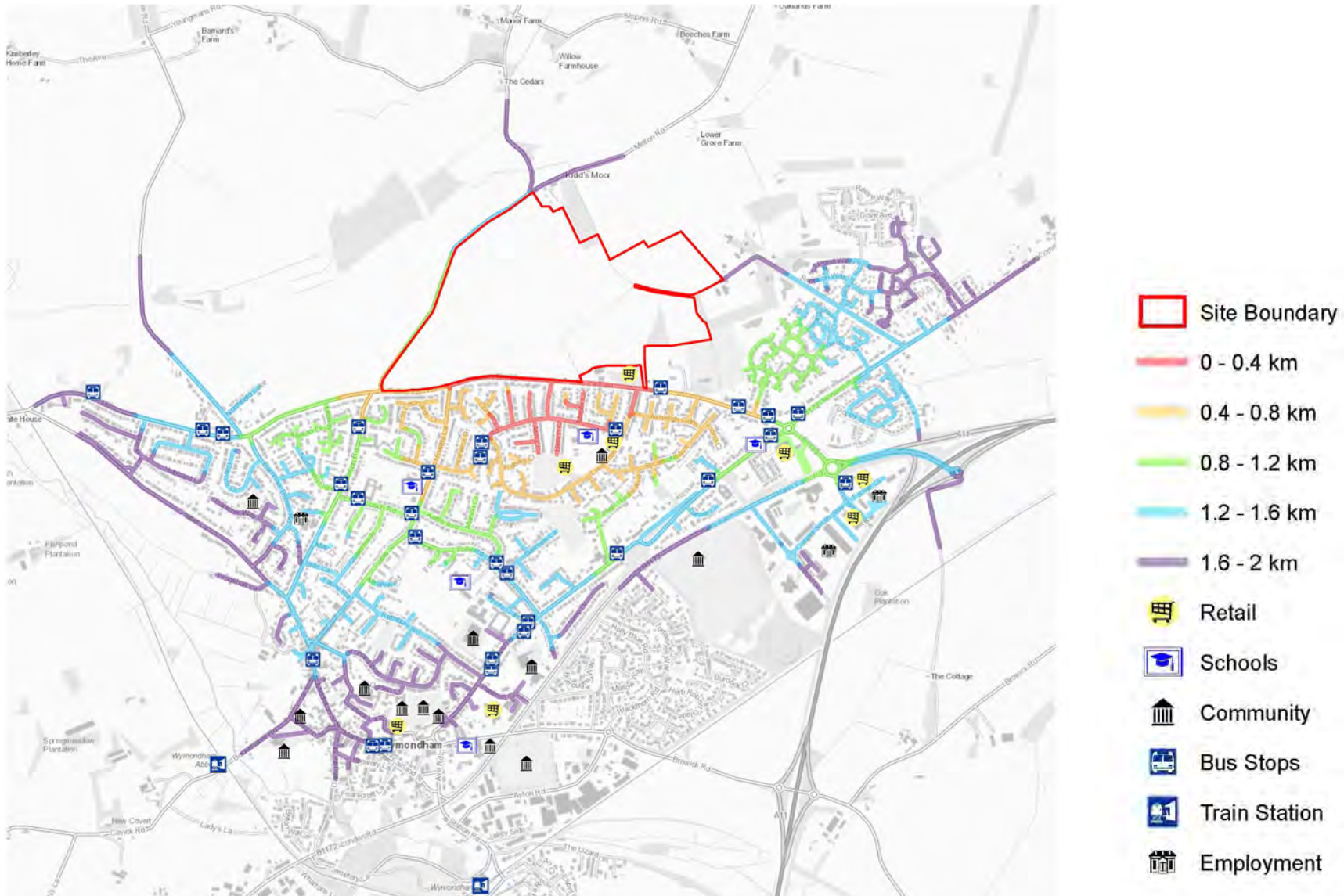
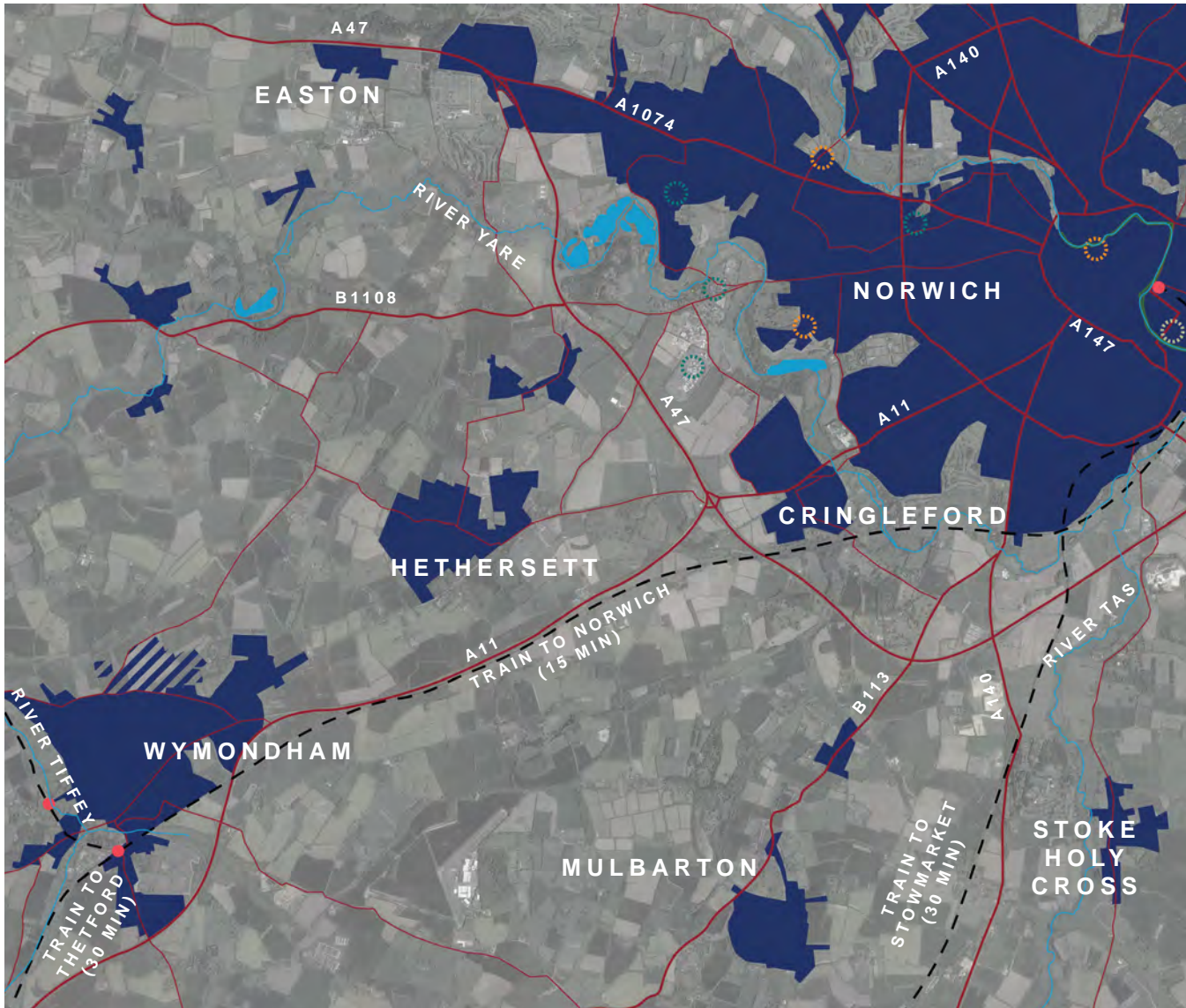


Figure 5; Pedestrian Connectivity Plan

3.3 WIDER CONNECTIVITY



The site is well located and within close proximity to a number of primary infrastructure routes, offering easy access to the wider area.

Two train stations are located to the south and west of Wymondham (approximately 9 minute and 7 minute cycling distance from the site), providing connections to Thetford and East Dereham.

The A11 highway runs south of Wymondham and is easily accessible from Tuttlés Lane East. This main road leads directly to Norwich centre to the north and to Cambridge via Thetford and Newmarket going south.

LEGEND

-  Application Site
-  Settlements
-  Water bodies and rivers
-  Roads
-  Railway and train stations
-  Hospitals
-  Universities
-  Football stadium

Figure 6; Wider Connectivity

3.4 PLANNING CONTEXT

The site is located within South Norfolk Council and therefore subject to its planning policies. Also, South Norfolk is working with Broadland District Council, Norwich City Council and Norfolk County Council to prepare the Greater Norwich Local Plan (GNLP).

The adopted South Norfolk Local Plan is made up of various documents, which along with the Supplementary Planning Documents and Advice Notes, defines the planning policies concerned with the proposal of new developments. The following documents are of relevance for the assessment of the sites landscape planning context.

JOINT CORE STRATEGY FOR BROADLAND, NORWICH AND SOUTH NORFOLK

(Greater Norwich Development Partnership, Adopted March 2011, amendments adopted January 2014)

The currently adopted Joint Core Strategy (JCS) for this area was delivered as part of the GNLP. This sets out the long-term vision and objective for this area, including strategic policies for steering and shaping developments.

Paragraph 2.14 of the JCS states:

In assessing the evidence to help identify the most appropriate locations for growth outside of the urban area, the area to the north east of the city and the A11 corridor to the south west perform well. This allows for a concentration of new development to maximise the use of existing infrastructure, achieve a scale of development that will deliver new supporting infrastructure at lower cost per unit, and mitigate against the environmental impacts of developing in greenfield locations.

This supports the argument for locating development growth along the A11 corridor. Also of particular relevance for the proposed development site are the following policies:

Policy 1: Addressing climate change and protecting environmental assets

- *Make the most efficient appropriate use of land, with density of development varying according to the characteristics of the area, with the highest densities in centres and on public transport routes*
- *Minimise the need to travel and give priority to low impact modes of travel*
- *Improve the resilience of ecosystems to environmental change*

Development and investment will seek to expand and link valuable open space and areas of biodiversity importance to create green networks.

Policy 1 stresses the importance to protect designated sites and landscapes, but also outlines requirements for new development regarding non-designated sites:

- *Minimise fragmentation of habitats and seek to conserve and enhance existing environmental assets of acknowledged regional or local importance. Where harm is unavoidable, it will provide for appropriate mitigation or replacement with the objective of achieving a long term maintenance or enhancement of the local biodiversity baseline*
- *contribute to providing a multifunctional green infrastructure network, including provision of areas of open space, wildlife resources and links between them*
- *help to make provision for the long term maintenance of the green infrastructure network*

Policy 2: Promoting good design

All development will be designed to the highest possible standards, creating a strong sense of place.

In particular development proposals will respect local distinctiveness including as appropriate:

- *the landscape setting of settlements including the urban/rural transition and the treatment of 'gateways'*
- *townscape, including the city and the varied character of our market towns and villages*
- *the need to ensure cycling and walking friendly neighbourhoods by applying highway design principles that do not prioritise the movement function of streets at the expense of quality of place.*

DEVELOPMENT MANAGEMENT POLICIES DOCUMENT

(South Norfolk Local Plan, Adopted October 2015)

The Development Management Policies (DMP) will determine how the Council carries out its development management responsibilities to promote sustainable development and how it will determine planning applications.

The following policies are of particular relevance to the site planning context:

Policy DM 4.5 Landscape Character and River Valley

All development should respect, conserve and where possible, enhance the landscape character of its immediate and wider environment.

Development proposals that would cause significant adverse impact on the distinctive landscape characteristics of an area will be refused.

All development proposals will be expected to demonstrate how they have taken the following elements (from the 2001 South Norfolk Landscape Assessment as updated by the 2012 review) into account:

- *The key characteristics, assets, sensitivities and vulnerabilities;*
- *The landscape strategy; and*
- *Development considerations.*

DM 4.7 Strategic Gaps between settlements within the Norwich Policy Area

Development will be permitted in the Strategic Gaps identified on the Policies Map, between the development boundaries of the Settlements listed below, where it would not erode or otherwise undermine the openness of the Strategic Gap, and complies with other Development Plan policies.

- *Cringleford – Hethersett*
- *Hethersett - Wymondham*

WYMONDHAM AREA ACTION PLAN

(South Norfolk Local Plan, Adopted October 2015)

The Area Action Plan (AAP) provides a specific planning framework for places where significant change or conservation is needed. Of particular relevance for the site are the following policies:

Policy WYM 8: General Green Infrastructure requirements for new developments within Wymondham AAP Area

New development in Wymondham will be required to maintain, protect and enhance green infrastructure.

Where appropriate new developments will be required to provide ecological links to the nearest green infrastructure and provide effective ecological buffers, the design of which to be negotiated with South Norfolk Council and other relevant bodies to ensure adequate protection of important ecological sites and maintenance of habitat connectivity.

Policy WYM 9: General Green Infrastructure requirements for new development in the north of Wymodham

Where appropriate new development in the north of Wymondham will be required to maintain, protect and enhance green infrastructure. In particular, where relevant, new development must consider the following:

- *Improved public access to the countryside*
- *Improved recreational provision*
- *Planting of hedgerow/parkland trees along Tuttle Lane, from east to west creating an ecological corridor*

GREATER NORWICH LOCAL PLAN

(Draft Plan (Regulation 18c))

The draft Greater Norwich Local Plan (Regulation 18c) is currently out for consultation. The draft GNLP will cover the period to 2038 and seeks, as a priority, to deliver inclusive growth and sustainable development.

The draft GNLP identifies that this objective will be supported by the delivery of:

- a minimum of 44,340 new homes;
- 360 hectares of employment land is allocated, and employment opportunities are promoted at local level;
- supporting infrastructure
- environmental protection and enhancement measures including further improvements to the green infrastructure network will be delivered

Policy 1: The Sustainable Growth Strategy

Growth will be distributed in accordance with the hierarchy detailed below in order to provide good access to services, employment and infrastructure. It is provided through urban and rural regeneration, along with sustainable urban and village extensions.

1. Norwich urban area (Norwich and Norwich Fringe)
2. Main towns
3. Key service centres
4. Village clusters

Wymondham is identified as one of the Main Towns that will play a key role in meeting housing growth and providing employment opportunities and services for the wider hinterlands. The role of Wymondham as a main town will be supported by strategic employment growth which will contribute to the development of the Cambridge Norwich Tech Corridor.

Policy 2: Sustainable Communities

Development must be high quality, contributing to the delivering inclusive growth in mixed, resilient and sustainable communities and to mitigating and adapting to climate change, assisting in meeting national gas emissions targets.

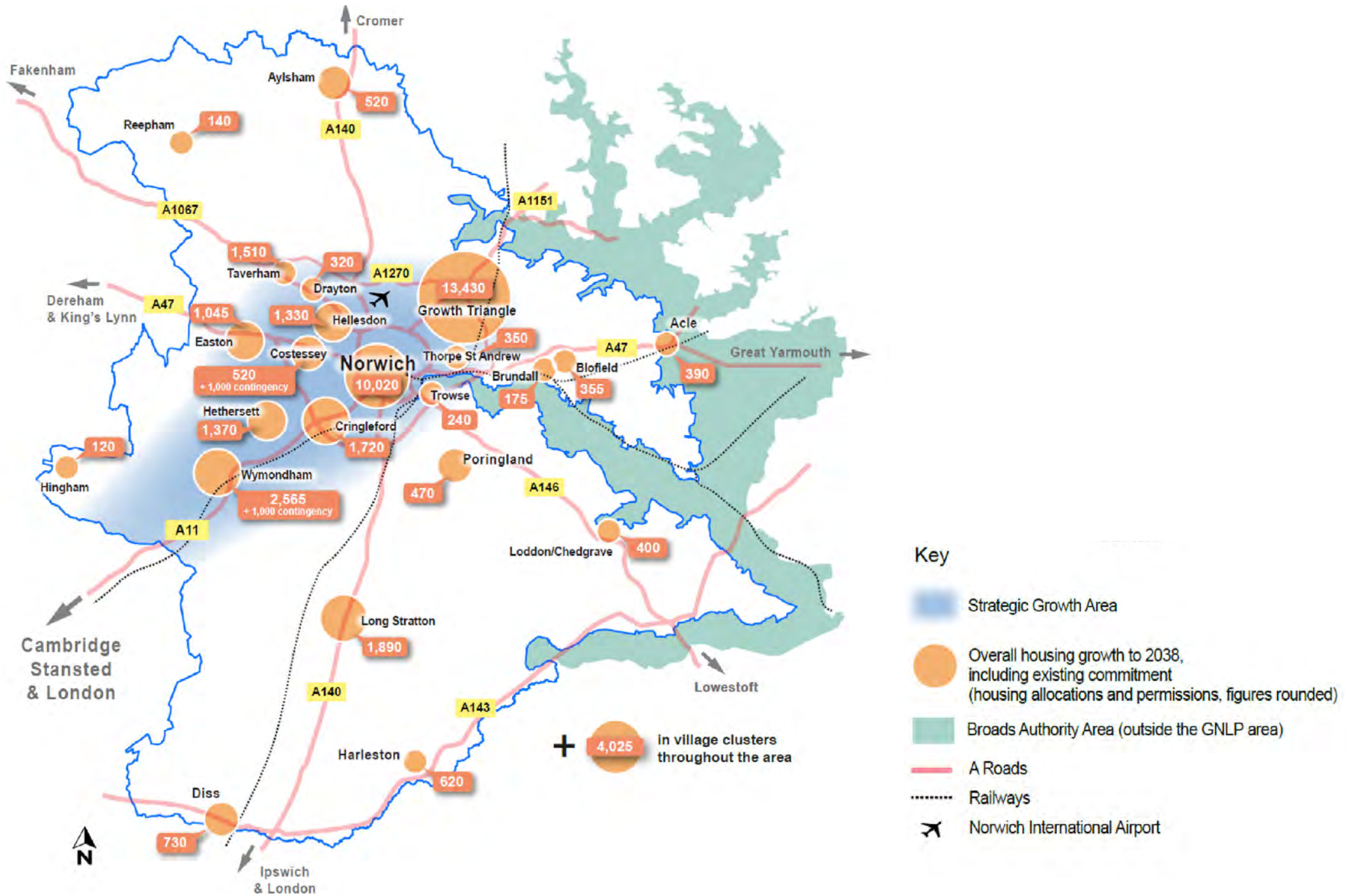
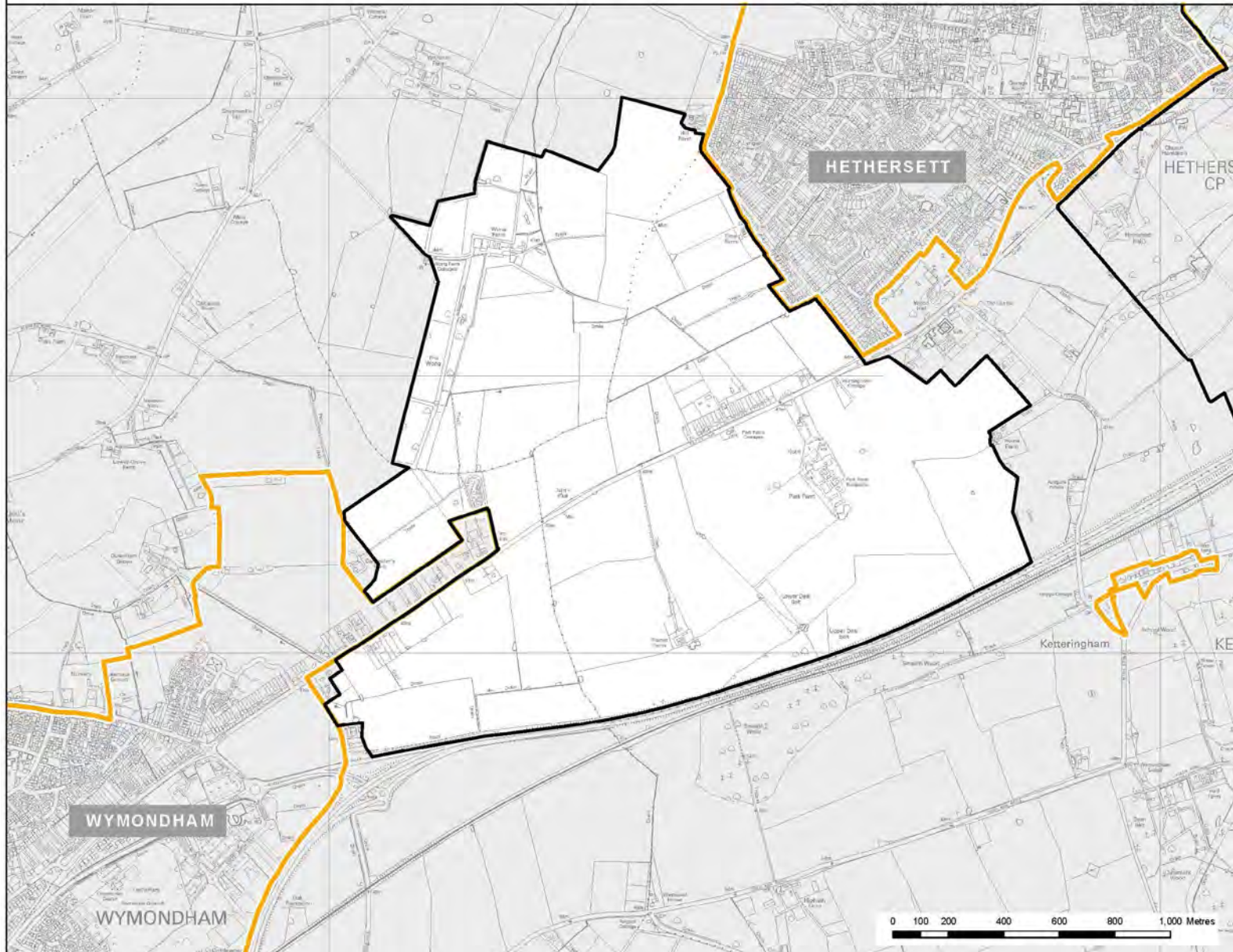


Figure 7; Housing Growth Locations Plan

MAP 4.7 (2)

Policy DM.4.7 Amendment to the Designated Strategic Gap between Hethersett and Wymondham



Strategic Gaps Policy DM 4.7



Development Boundary



Scale at A3:
1:14,000

Figure 8; DMP Strategic Gap

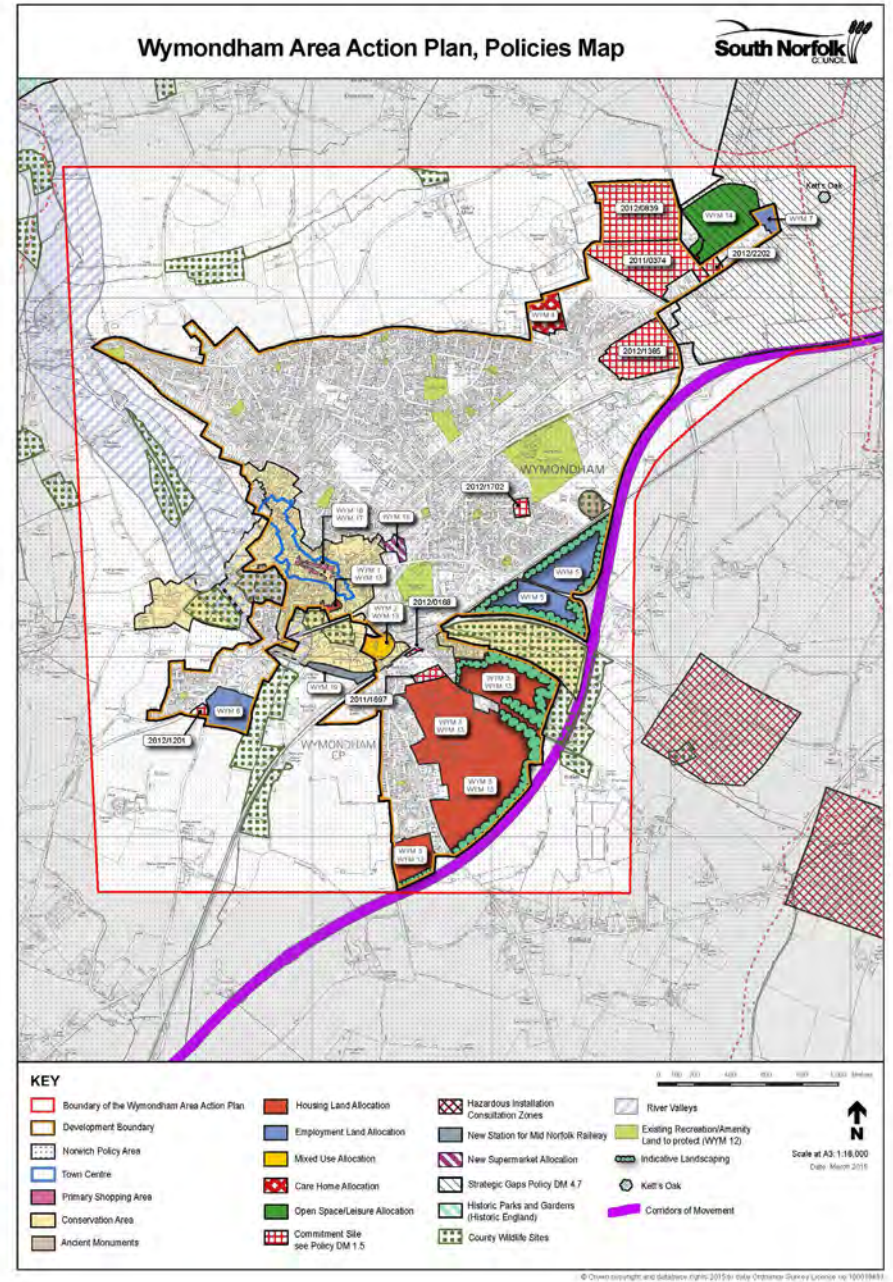
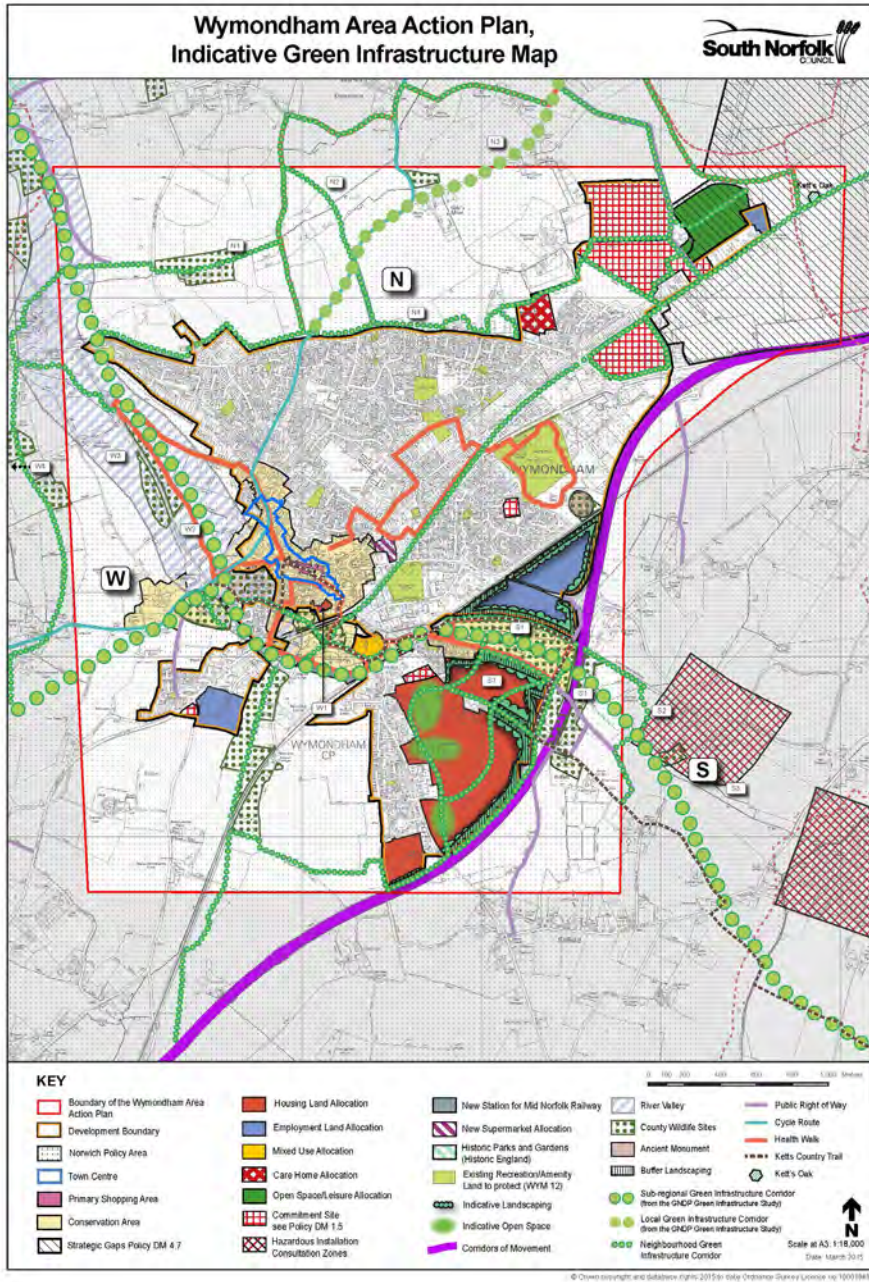


Figure 9; Wymondham AAP Maps

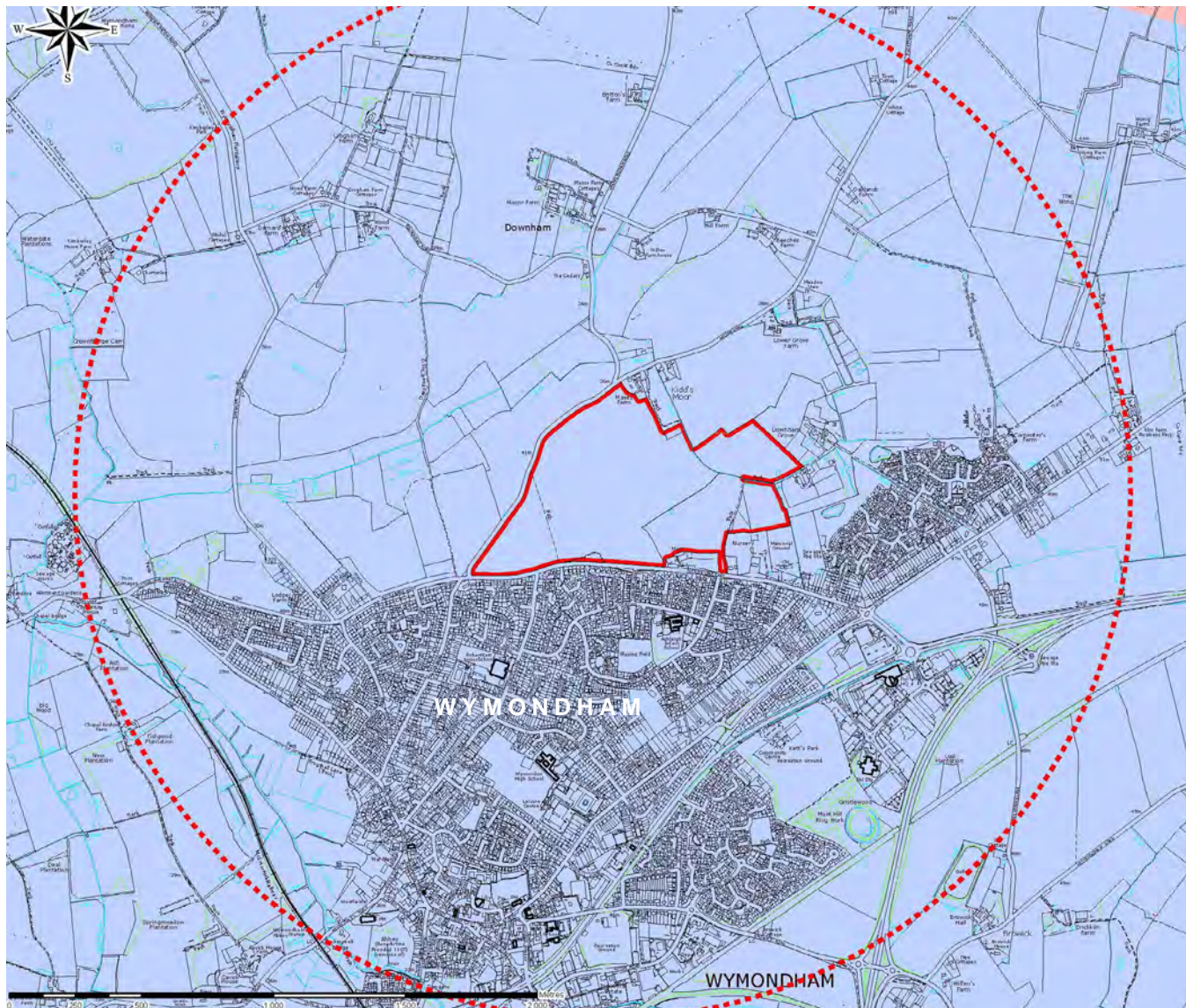




4.0

LANDSCAPE APPRAISAL

The baseline mapping study of the site includes site topography, designations and historical mapping studies, in order to inform the opportunities and constraints of the site.



South Norfolk and High Suffolk Claylands National Character Area (NCA).

The site is located on the north eastern edge of this NCA. This is predominately flat clay plateau, incised by numerous, small-scale, wooded river valleys with unexpected complex slopes.

Woodlands are still a notable feature in the landscape, although quite sparse, along with hedges and hedgerows trees, they serve to restrict the typically open views. Within the valley the landscape is quite confined and views are intimate.

The settlement pattern of this NCA is a mix of nucleated villages, dispersed hamlets and moated farmsteads. A common feature to all these settlement typologies are the interconnected village greens or commons.

LEGEND





-  Site Boundary
-  2km Radius
-  South Norfolk and High Suffolk Claylands
-  Mid Norfolk

Figure 10; National Landscape Character

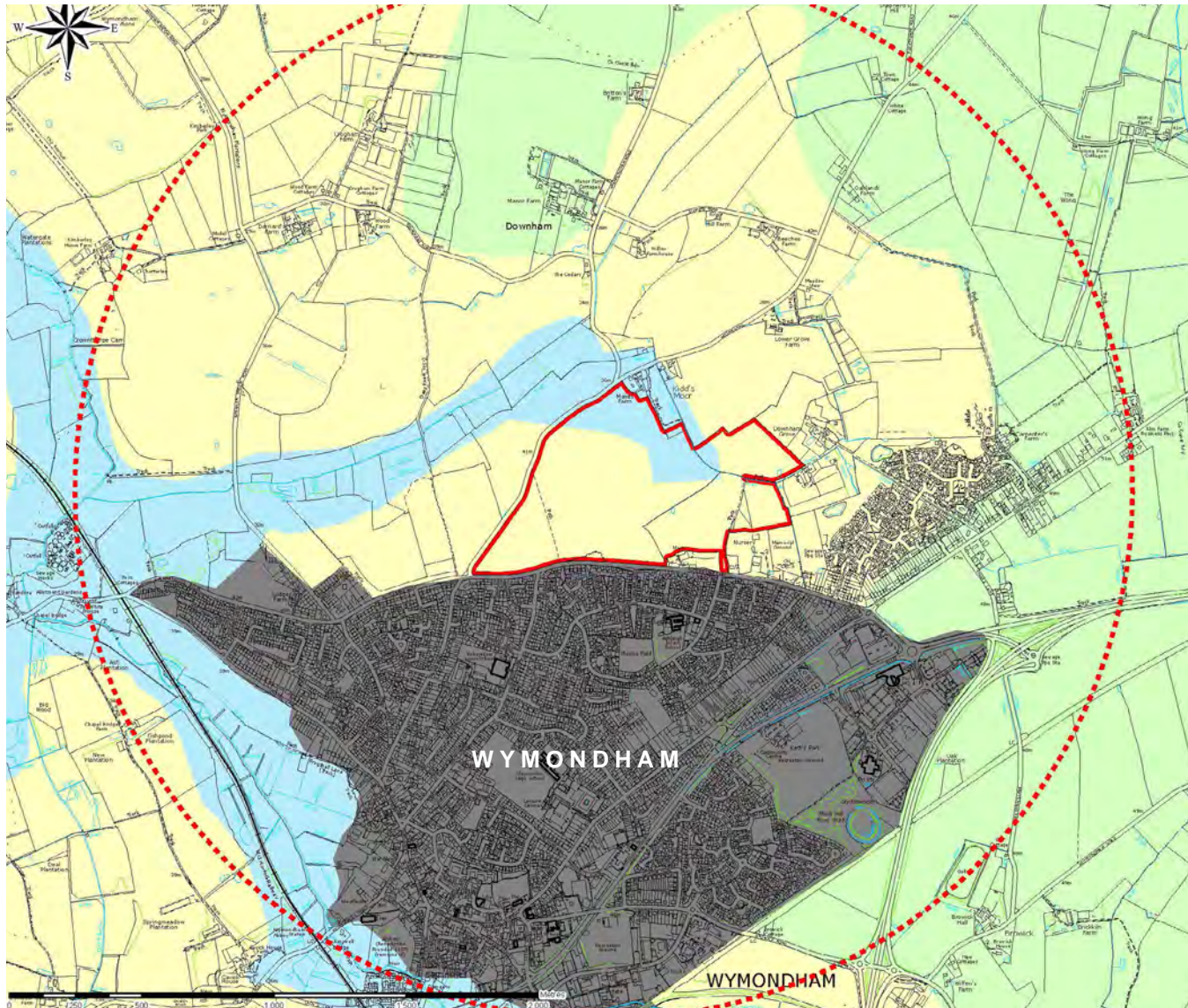


Figure 11; Regional Landscape Character

Valley Meadowland

This landscape typology characterises the northern edge of the site. It is typically made up of low lying valley floors occupied by pastoral land. Watercourses and rivers are notable features.

'The presence of water, limited settlement and often extensive areas of grazed water meadows create a tranquil, rural landscape.'

Valley Settled Farmlands

Most of the site lies within this typology, which is characterised by gently sloping valleys. The majority of this landscape typology is arable land with mixed-used, peri-urban areas.

'Woodlands are limited to the upper part of the slopes, but hedgerows have a strong visual impact on this landscape.'

LEGEND

-  Site Boundary
-  2km Radius
-  Valley Settled Farmlands
-  Urban Area
-  Valley Meadowlands
-  Wooded Plateau Claylands

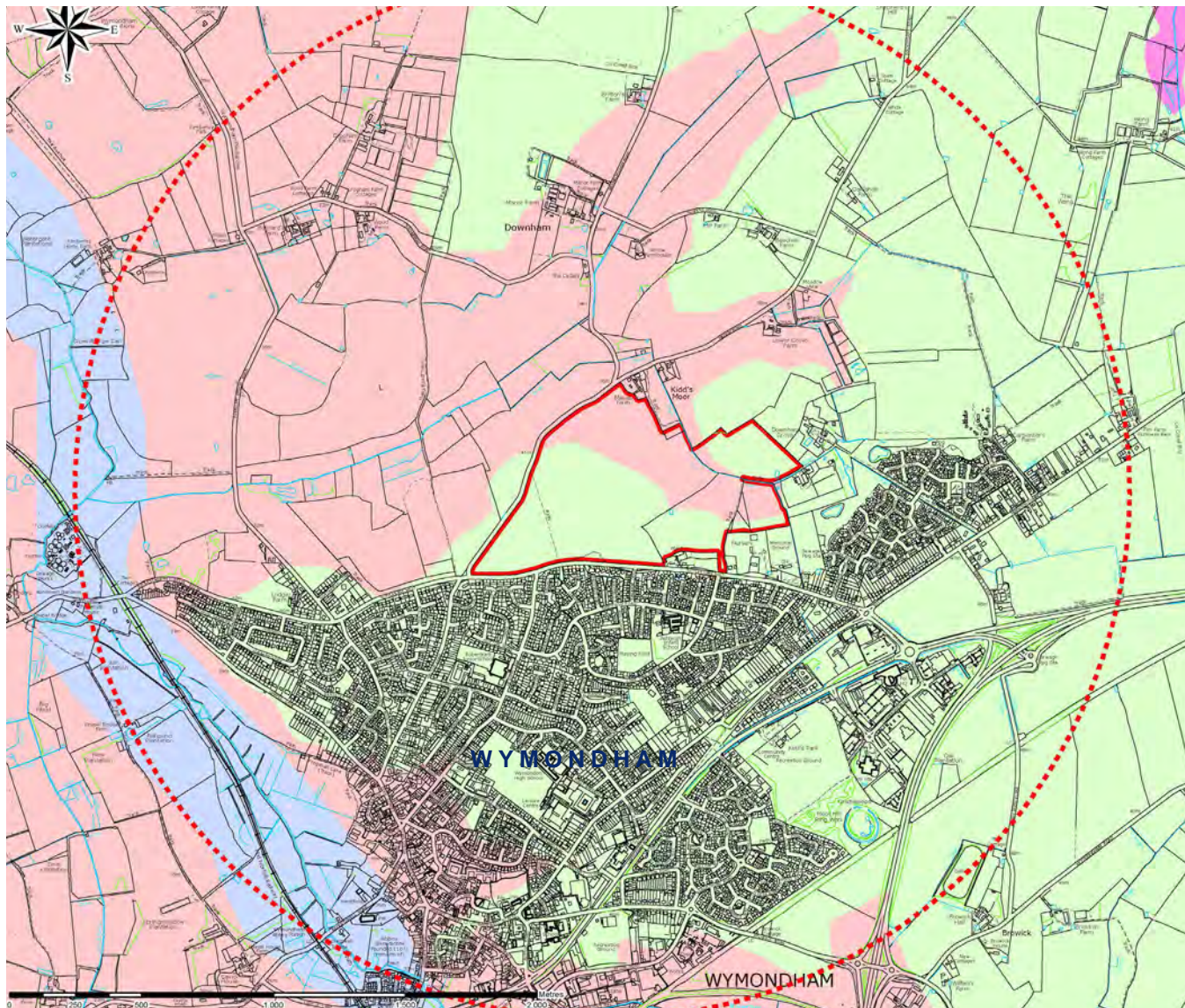


Figure 12; Local Landscape Character

Tiffey Tributary Farmland

This is 'a flat, shelving to gently undulating landscape incised by small hidden tributary streams and their small-scale shallow valleys.' The majority of the landscape is large scale fields used for rural working purposes with sparse settlements. Woodland cover is limited but creates wooded horizon outlines.

Cross valley long views are typical and feature some important landmarks.

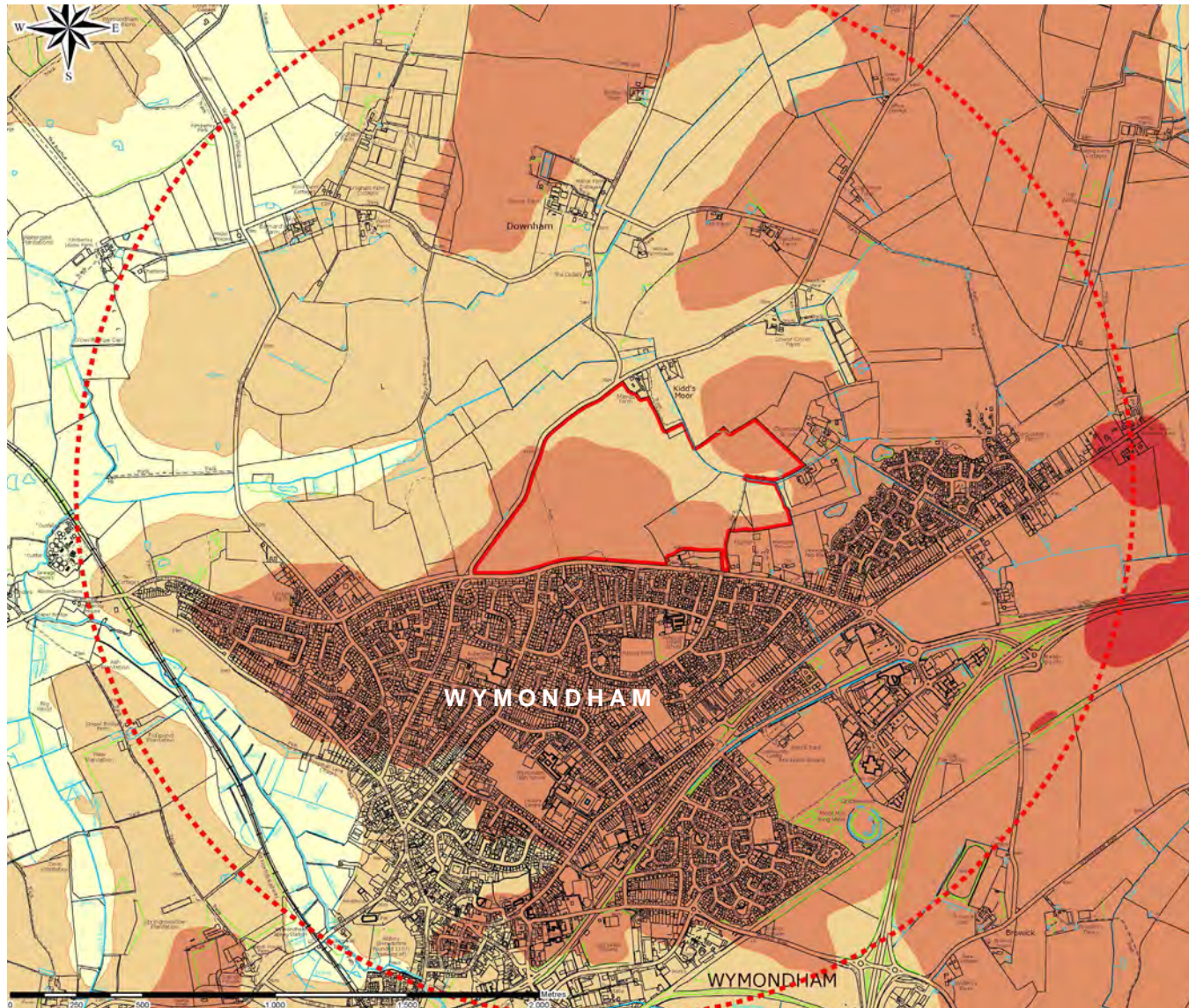
Wymondham Settled Plateau Farmland

This is 'a settled landscape with large edge-of-plateau towns (including market towns and those of more modern origin) and villages plus smaller, nucleated settlements which are dispersed across the plateau. Wymondham, a well-preserved medieval settlement, dominates the western edge.' The countryside is mostly large-scale open fields.

LEGEND

-  Site Boundary
-  2km Radius
-  Tiffey Tributary Farmland
-  Wymondham Settled Plateau Farmland
-  Yare Tributary Farmland with Park
-  Yare/Tiffey Rural River Valley

4.4 TOPOGRAPHY



The river valley is clearly identifiable from the topographical map of the site.

The higher ground to the east and south is incised by the River Tiffey and associated land drains. The river wraps around the southern edge of Wymondham and branches out into a number of drains that collect water from surrounding arable fields. Slightly further to the west is Dyke Beck valley.

LEGEND







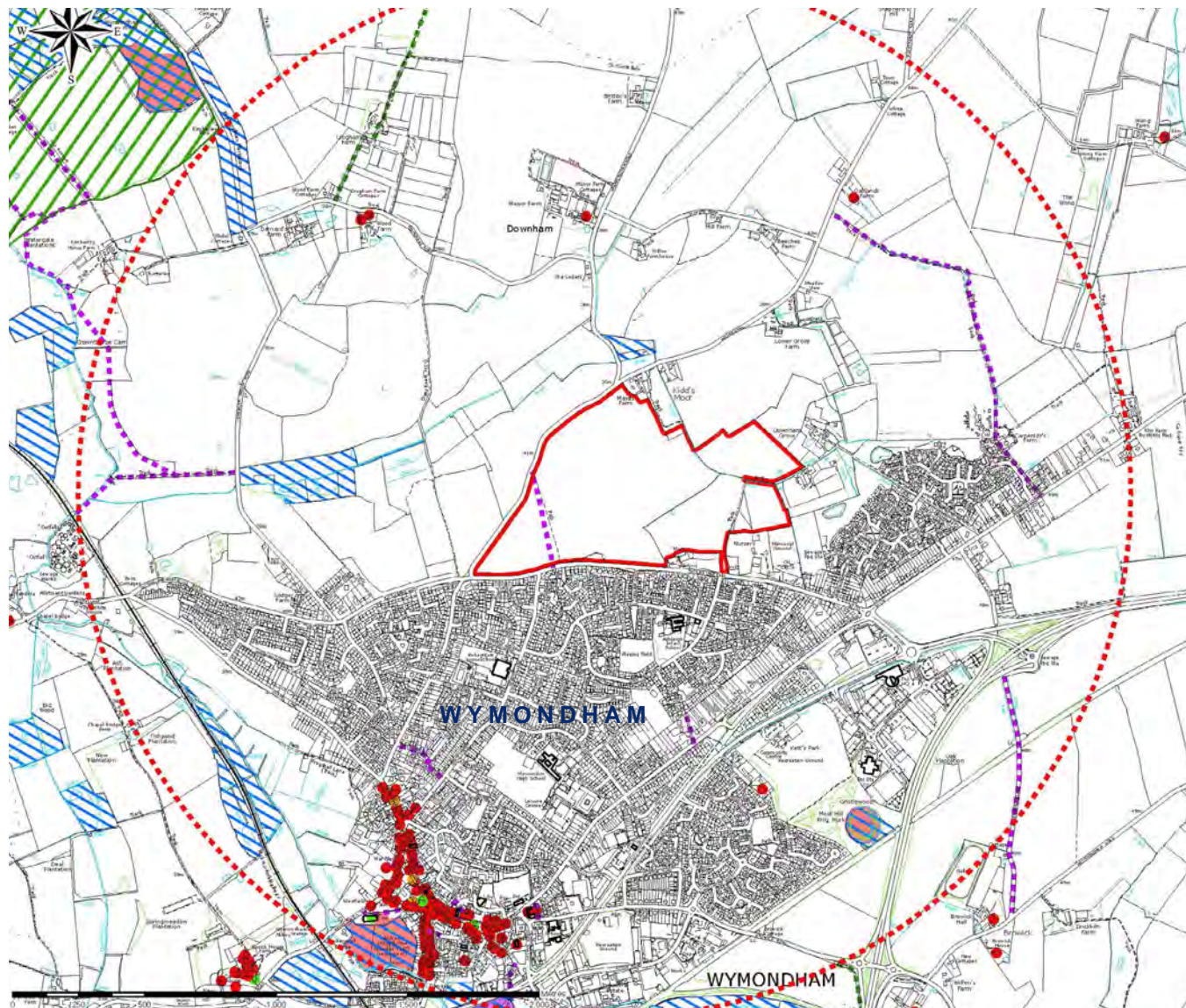
-  Site Boundary
-  2km Radius
-  20-30m
-  30-40m
-  40-50m
-  50-60m

Figure 13; Topography

4.5 LANDSCAPE DESIGNATIONS



There are no landscape or heritage designations within the site boundary. A number of County Wildlife Sites (CWS) are located within a 2km radius, as shown on figure 13 with all other designations located further afield.

The majority of the listed buildings are concentrated to the south of Wymondham within the Conservation Area, including Wymondham Abbey Scheduled Ancient Monument (SAM). Moot Hill SAM is located to the east.

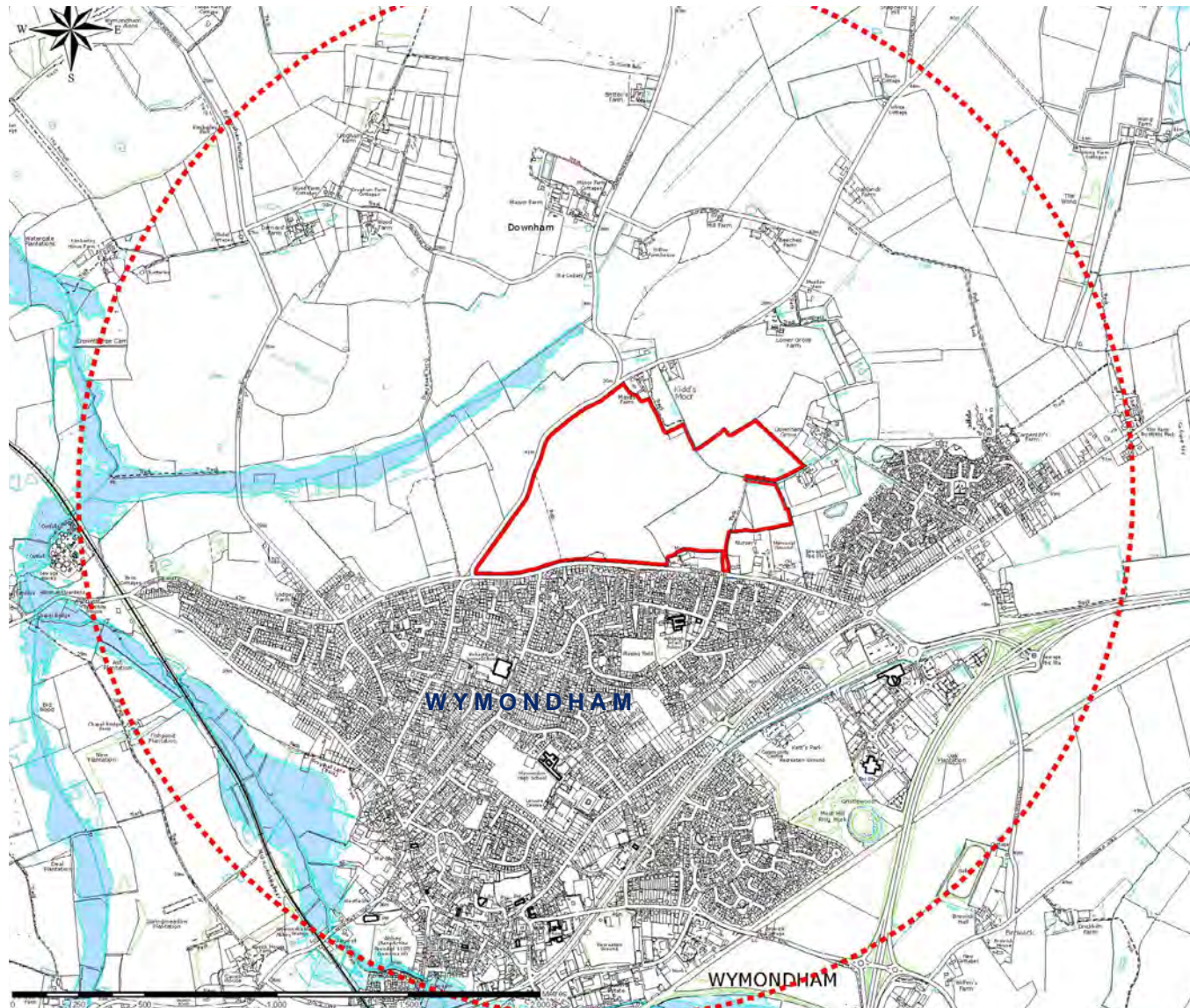
Manorial Site SAM, which is located within Kimberley Hall Grade II* Registered Park and Gardens, is located more than 2km away from the site to the north west.

LEGEND

-  Site Boundary
-  2km Radius
-  Scheduled Ancient Monuments
-  Local Nature Reserves
-  Registered Parks and Gardens
-  County Wildlife Sites
-  Public Footpath
-  Bridleway
-  Grade I Listed Buildings
-  Grade II* Listed Buildings
-  Grade II Listed Buildings

Figure 14; Landscape Designations

4.6 FLOOD RISK



The Flood Zones surrounding the site relate to the River Tiffey, Dyke Beck and the main drains across arable land.

The north western edge of the site is approximately 200 metres away from Flood Zone 2, which extends along the field drain. This is the closest point of the Site to a Flood Zone.

LEGEND

-  Site Boundary
-  2km Radius
-  Flood Zone 2
-  Flood Zone 3

Figure 15; Flood Risk

4.7 HISTORIC MAPS

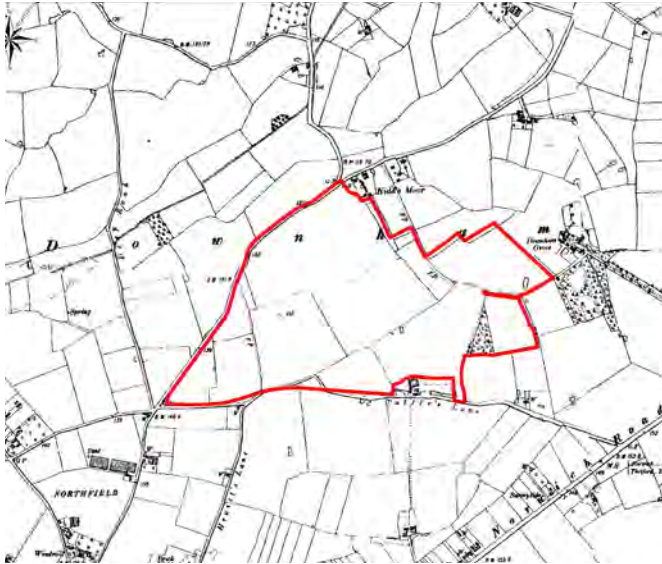


Figure 16a; Historic Maps - 1907

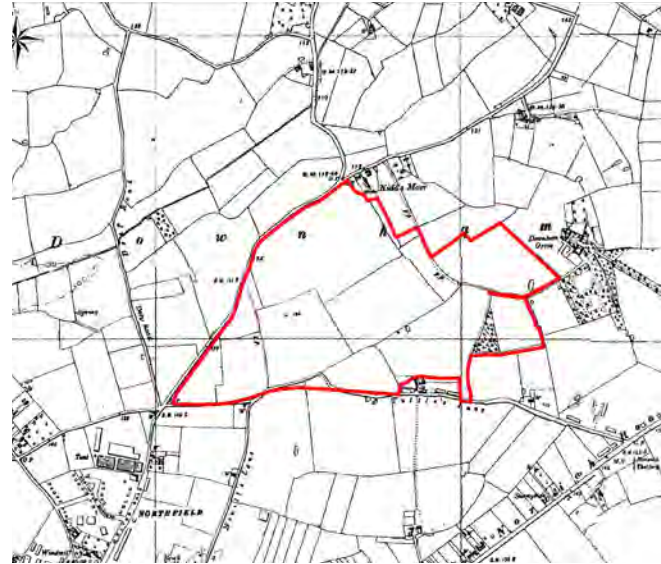


Figure 16b; Historic Maps - 1938

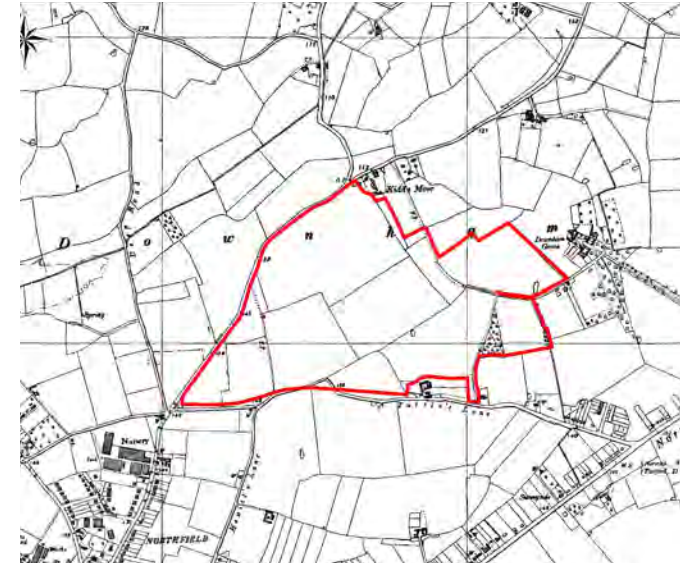


Figure 16c; Historic Maps - 1957

The three maps above show the evolution of the site and its context in the early 20th century.

Within these 50 years no changes appear within the site boundary, which has been retained as agricultural fields with a traditional enclosure pattern. Up until 1957, Wymondham settlement had not reached Tuttle Lane East, but some initial urban expansion is notable to the south west of the site.

LEGEND

 Site Boundary

4.8 SUMMARY

The baseline mapping analysis reveals a number of constraints located within the study area, however only a small number of them are in close proximity to the site.

As summarised in the adjacent table, there are few landscape designations within the study area. Two designated County Wildlife Sites are located in close proximity of the site to the north. The majority of the heritage designations are concentrated within the Wymondham Conservation Area approximately 800 metres to the south, including the majority of the Listed Buildings and Scheduled Ancient Monuments.

The public footpath Wymondham FP6, which crosses the site in the south west corner, is a key constraint for further consideration.

For further assessment of the landscape effects of the proposal on the identified receptors please refer to the Landscape and Visual Appraisal (by Bidwells).

DESIGNATIONS / PROTECTION	STUDY AREA STATUS
National Park	None within the study area.
Area of outstanding Natural Beauty	None within the study area.
Area of High Landscape Value (or similar local designation)	Yes. Seven County Wildlife Sites are located within the study area, with two in the site proximity: Melton Road Meadow and Deep Road Meadow. One Local Nature Reserve (Toll's Meadow Wymondham) is located on the southern edge of the study area.
Green Belt	None within the study area.
World Heritage Sites	None within the study area.
Schedule Monuments	Yes. Three Scheduled Ancient Monuments are located within the study area: Moot Hill, the Market Cross and Wymondham Abbey.
Conservation Area	Yes. Wymondham Conservation Area is located to the south of the study area.
Listed Buildings	Yes. A number of Listed Buildings are located within the study area, mostly gathered within the Conservation Area.
Registered Parks and Gardens	None within the study area. However Kimberley Hall is located on the edge of the study area to the north west.
Tree Preservation Order (TPO)	Yes. There are a number of TPOs within the study areas, but none within the site or its proximity.
Public Right of Ways	Yes. Footpaths - Wymondham FP31, FP5, FP26, FP28, FP7, FP11, FP8, FP38 and FP6 (within the site) Bridleway - Wymondham BR27





5.0

VISUAL STUDY

The visual study of the site includes photography showing the site and its context and a series of viewpoints that identify relevant visual receptors.

5.1 PHOTOGRAPHIC SURVEY

The following photos show the site and its immediate context.

The site slopes towards the north eastern boundary, where water collects in existing drains and ponds. The built edge of Wymondham defines the southern boundary, whilst blocks of woodland and field edge planting enclose the rest of the site. The horizon line is mostly filtered by existing planting, although there are occasional long views through woodland gaps.



Figure 17; Photos Locations



Footpath link heading south across Tuttle Lane West.



View of properties within Wymondham which front onto Tuttle Lane West.



Sloping topography along the northern boundary of the site.



View along Melton Road to the northern site boundary.



View along Melton Road at the arrival into Wymondham.



View looking northwest from the southern site boundary.



Long view across the site looking north.



View from the southeast corner of the site looking north.



Field drain to the eastern edge of the site.



View across the north east of the site towards Downham Groove buildings.



View from the southeast corner of the site towards the Rugby Club.



Access road into Wymondham settlement.

5.2 ZONE OF THEORETICAL VISIBILITY AND VIEWPOINTS

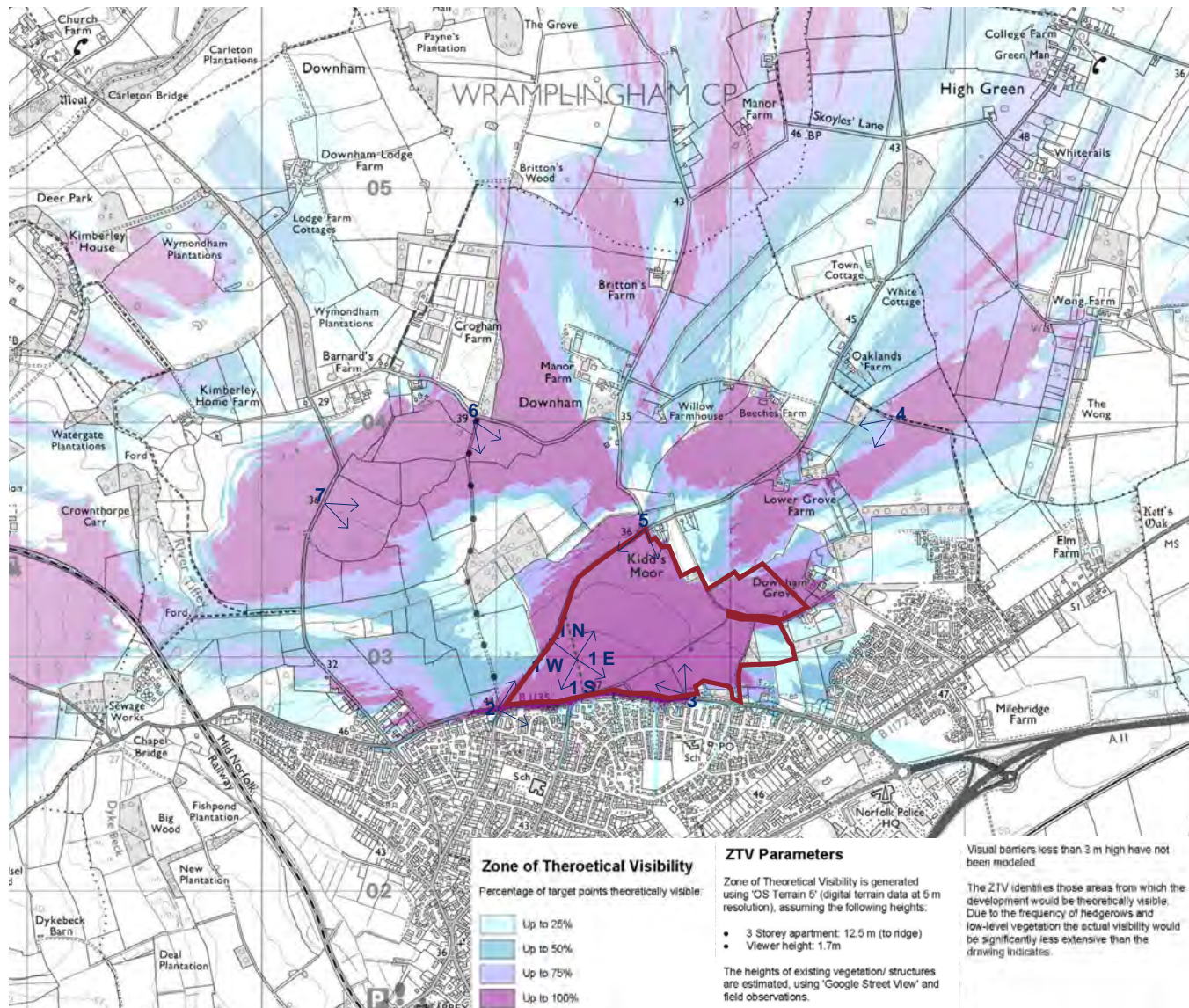


Figure 18; ZTV and Viewpoints

The area of land from which the development is potentially visible is shown on the Zone of Theoretical Visibility (ZTV) map (left).

The ZTV is modelled assuming the worst case scenario of three storey high development (12.5m). Wymondham settlement limits views of the site from the south. Within the ZTV a number of visual receptors were recorded and the following viewpoints aim to be representative of the visual experience of different types of views.

Most of the identified visual receptors are road users on country roads surrounding the site. The site is also visible from two public footpaths and from Turtles Lane East, a busy main road. The sensitivity of visual receptors along the footpaths is expected to be high, but will be lower for road users along the country roads and Turtles Lane East.

For detail assessment of the visual effects of the proposal on the identified receptors please refer to the Landscape and Visual Appraisal (by Bidwells).



Viewpoint 1 North - View looking north across the site from public footpath Wymondham FP6. The footpath crosses the south west corner of the site, linking Tuttlles Lane West to Melton Road. Arable fields occupy the foreground view. The wooded horizon line is largely filtered by existing planting with some long glimpsed views. Receptors associated with this view are pedestrians using the public footpath.



Viewpoint 1 East - View looking east across the site from public footpath Wymondham FP6. The footpath crosses the south west corner of the site linking Tuttlles Lane West to Melton Road. Arable fields occupy the extents of the view. The horizon is made up of wooded slightly elevated ground, although isolated dwellings and the Garden Centre buildings are visible between existing trees. Receptors associated with this view are pedestrians using the public footpath.



Viewpoint 1 South - View looking south across the site from public footpath Wymondham FP6. The footpath crosses the south west corner of the site linking Tuttlles Lane West to Melton Road. The site's cultivated fields take the whole of the foreground. The horizon outline is largely defined by the houses along Tuttlles Lane, Wymondham settlement northern edge. Receptors associated with this view are pedestrians walking on a public footpath.



Viewpoint 1 West - View looking west across the site from public footpath Wymondham FP6. The footpath crosses the south west corner of the site linking Tuttlles Lane West to Melton Road. The sites cultivated fields cover the foreground. The horizon outline is heavily dominated by Wymondham houses to the left of view, whilst to the right, wooded hills and rows of field edge trees are predominant. Receptors associated with this view are pedestrians using the public footpath route.



Viewpoint 2 - View looking east at the site from the southern end of Melton Road. The sites arable fields are located at the centre of the view, to the right are the existing dwellings of Wymondham. The horizon line, in the far background, is softly defined by woodland and trees. Receptors associated with this view are road users at this junction with Tuttle Lane West.



Viewpoint 3 - View looking north at the site from Tuttle Lane West. The sites arable fields are visible at the centre of the view framed by a mature hedgerow to the left and the Garden Centre access to the right. The horizon is softly defined by woodland and trees. Receptors associated with this view are road users, including pedestrians travelling along Tuttle Lane West.



Viewpoint 4 - View looking west towards the site from public footpath Wymondham FP26. The field in the foreground has recently been turned into a water basin. The site is located behind the existing field edge planting and woodland. Glimpses of the Garden Centre poly-tunnels are visible through the existing planting. Receptors associated with this view are pedestrians using the public right of way, which is part of the Beeches Farm country walk provided under the Countryside Stewardship, Environmentally Sensitive Areas and Stewardship Schemes.



Viewpoint 5 - View looking south west across the site from Melton Road. In the foreground view is the site, currently cultivated and to the right is Melton Road. This viewpoint is located on the lower corner of the site and existing dwelling roofscapes are visible just above the field. The Garden Centre complex is visible to the left of the view. Receptors associated with this view are road users on Melton Road.



Viewpoint 6 - View looking south east towards the site from Youngmans Road. The arable field in the foreground is defined by a clipped hedgerow. Behind the hedgerow to the right is a dense block of trees, to the left of this a long view reaches the existing settlement edge. The site is visible in this long view. Moving to the left views of the site and surrounding dwellings are filtered by existing field edge planting. Overall, the horizon is softly defined by trees and woodland, receptors associated with this view are road users travelling along Youngmans Road.



Viewpoint 7 - View looking east towards the site from Barnham Broom Road. The site is partially visible in the background, a block of woodland filters views from the left. The existing settlement clearly defines the horizon line, broken by the occasional tree canopy and the woodland block. Receptors associated with this view are road users travelling along Barnham Broom Road.





6.0

CONSULTANT REPORTS SUMMARY

The following section provides a summary of reports undertaken for:

- Arboricultural appraisal
- Ecology
- Flooding
- Archeology
- Utilities
- Transport

6.1 ARBORICULTURAL SURVEY

Oakfield Arboricultural Services have produced an Arboricultural Appraisal which identifies the arboricultural constraints that exist on site in relation to the proposed development.

The desktop survey taken from the 'My South Suffolk' website indicates there are no Tree Protection Orders (TPOs) within the site or its proximity.

'The majority of trees on the site are oak, ash and sycamore species. The surveyed vegetation was in general of native species and for the most part confined to field and land boundaries. Overall the sites vegetation was typical in its agricultural makeup with large individual specimen trees within hedgerows or taller lapsed hedgerows.'

The survey uses a trees categorisation method defined as follows:

- **Category A** - Trees of high quality and value that are considered particularly good examples of their species and / or essential components of groups such as dominant trees within avenues. Trees will have a minimum of 40 years life expectancy.
- **Category B** - Trees of moderate quality that may have been category A but have been downgraded due to impaired features such as significant remedial defects or poor past management that make their retention unsuitable beyond 40 years. Trees will have a minimum of 20 years life expectancy

- **Category C** - Trees of low quality that are unremarkable and have limited merit or such impaired condition they do not qualify for higher categories. Tree will have minimum of 10 years life expectancy
- **Category U** - Trees of poor quality and are in such condition they have less than 10 years useful life expectancy. Trees in this category are generally recommended for removal regardless of any proposals.

Of the vegetation recorded within the site there is the following percentage split between categories: -

- *Category B 57% - 49 individuals or groups - retention highly desirable*
- *Category C 42% - 37 individuals or groups - retention desirable*
- *Category U 1% - 1 individual - remove on arboricultural grounds*

There are no urgent management actions identified for the existing trees, however once the development construction phase starts there will be:

'a need for a more pro-active management regime will likely be required. This would include such works as removal of dead, dying, damaged trees and or branches and other remedial works such as crown lifting so as to ensure health and safety obligations. This may also include management of areas of woodland that may be opened up to the public as usable open space.'

Overall the tree constraints within the red line boundary are considered low due to their locations. In fact most vegetation should be deemed as an asset to the site as they will screen any development somewhat to the wider landscape, this is of particular relevance to the northern boundaries of the site.'

6.2 ECOLOGY

Hopkins Ecology prepared a strategic ecological assessment of the site which identifies constraints and opportunities in the context of the proposed development.

The report concludes that great crested newts are absent from the site on the basis of the negative surveys of on-site ponds in 2019 and all but two of the ten off site ponds within 250m of the site, which were surveyed for nearby schemes in 2010, being negative. Also, the vast majority of ponds in the wider locality have been surveyed and great crested newts have not been reported, such that it is reasonable to conclude that they are not present locally.

Other surveys of the site in 2019 did not find any evidence of other groups including water voles, otters, badgers, reptiles and brown hares and are therefore considered absent from the site. No evidence of roosting bats was found within the trees surveyed on site, but small roosts cannot be ruled out.

A number of nesting species were present on site which included skylarks, yellowhammer, dunnock, istle thrush and song thrush. House sparrows and starlings were found to be nesting off site, but foraging on-site.

The Site is considered to be of a typical Norfolk farmland, with skylarks at 'typical' densities for winter cereals. The numbers and individual species are considered to be of no more than local importance. Other species scoped in are hedgehogs and widespread but declining moths. These would be of local importance and minor components of larger populations across the landscape.



Figure 19; Ecological Constraints

Habitat loss is considered to be the principal pathway of adverse impact, with mitigation available for most species via appropriate soft landscaping and scheme design. The scheme proposals will provide substantial enhancement for species with equivalent conservation status, both birds and other species groups.

The impacts on the majority of species can be mitigated. through appropriate landscaping and scheme design which has the potential to deliver net ecological gain. This could include the delivery of the green infrastructure corridors identified within the Wymondham AAP.

6.3 FLOODING

Cannon Consulting Engineers prepared a supporting note for the allocation of the site, reviewing flood risk and associated impacts.

The entire site is located within Zone 1 (the low probability flood area).

'The site is not therefore considered to be exposed to flooding as the result of overtopping of a Main River or other significantly sized watercourse.'

Surface water flood mapping indicates areas where surface water runoff may pool and flow during and following various rainfall events.

The majority of the site is located again in Very Low flood risk area (less than 1 in 1,000 chance of flooding). Only some isolated areas are at risk of flooding within the site, with bigger risk being located outside the boundary to the east in association with existing watercourses.

'The impact of surface water flooding on the proposed residential units should be readily manageable through appropriate masterplanning that makes space in the layout for water (allowing for low impact flood routes along landscaped corridors for example).'

British Geological Survey (BGS) borehole records and mapping shows that the site is underlain by Boulder Clay with Chalk at depth. Groundwater flooding (flooding resulting from the emergence of a groundwater body at the surface of the site) is therefore not considered a realistic threat.'

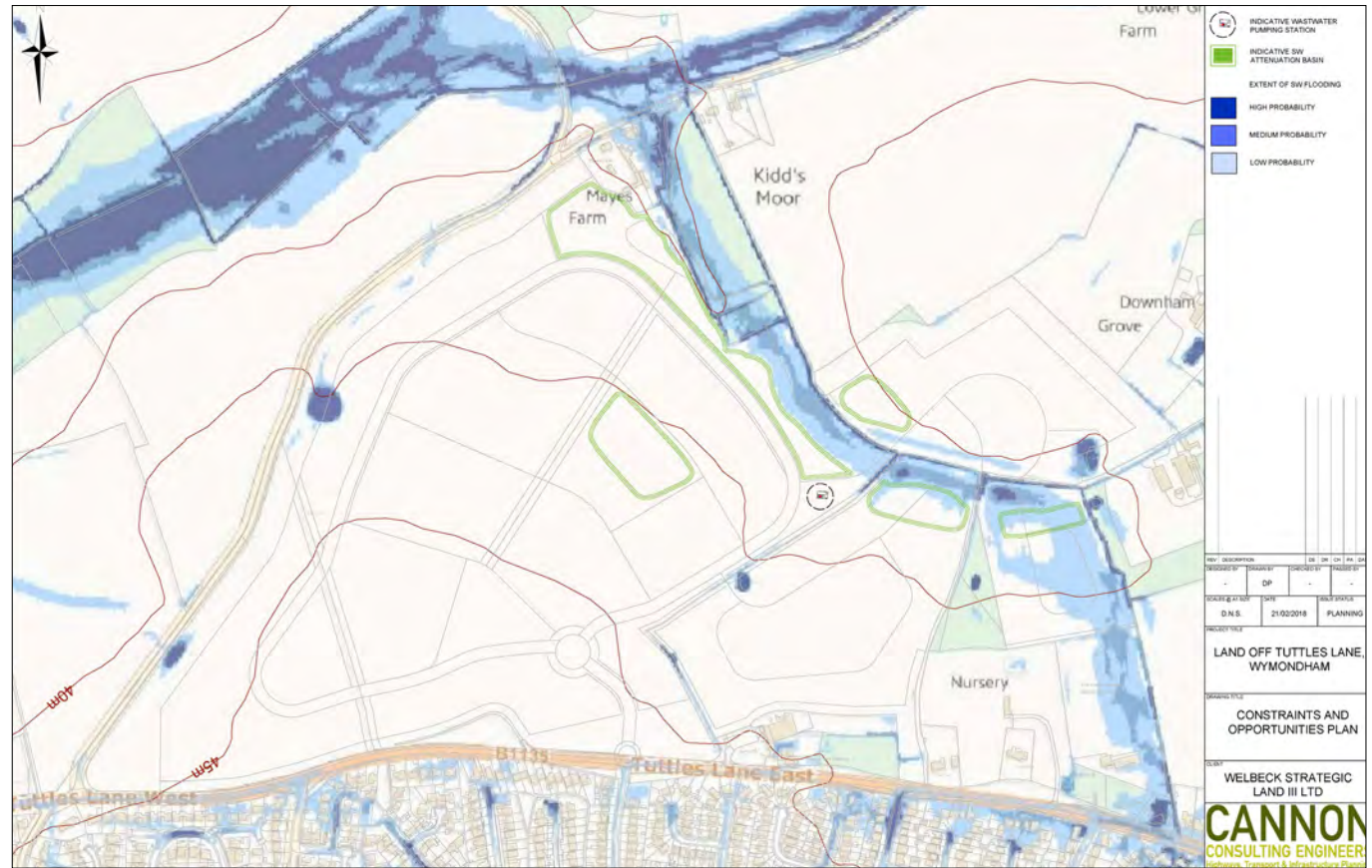


Figure 20; Flood Risk Zones

Anglia Water plans show a network of surface water sewers running to the south of the site. Overflow of the existing system could be dealt with by directing it towards Turtles Lane East; any flows that enters the site could be managed within the on-site road network.

The proposed surface water management strategy includes a series of grassed attenuation basins 1m deep with 1 in 4m side slopes. The attenuation has been sized assuming that approximately 50% of the site area is impermeable.

6.4 ARCHAEOLOGY

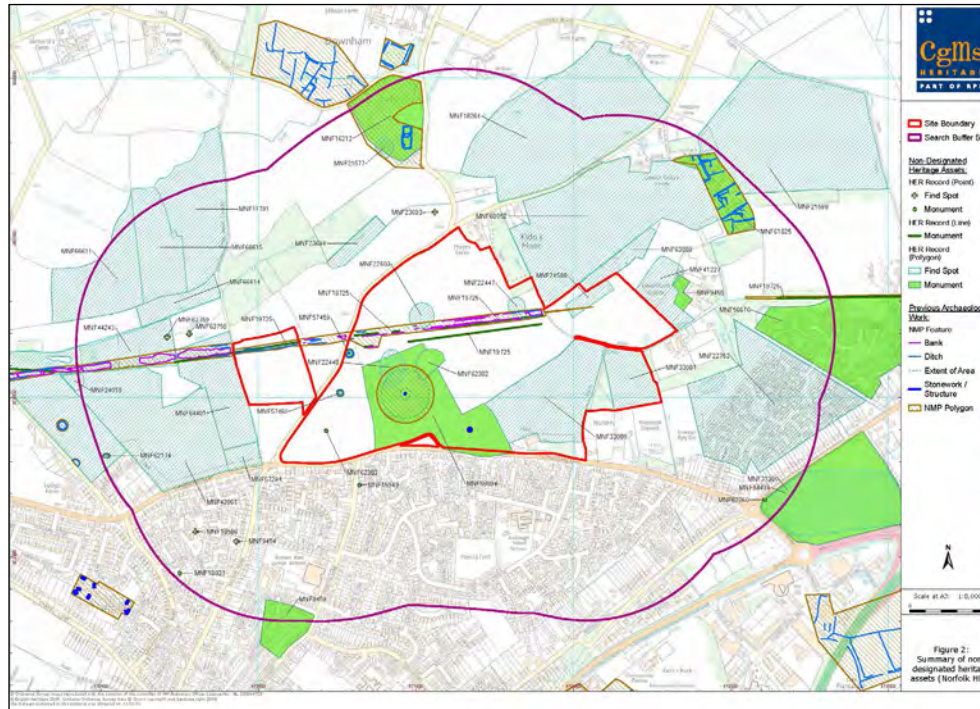


Figure 21; Non Designated Heritage Assets

CgMs have produced a cultural desk based assessment to identify archeological and heritage constraints on the site.

Roman and Bronze Age remains are known to be located within the site.

'A moderate archaeological potential for Early Prehistoric, Neolithic, Iron Age and Medieval evidence, a low to moderate archaeological potential for Anglo-Saxon evidence and a low archaeological potential for Post-Medieval evidence is also considered.'

The report findings conclude the proposed development of the site is likely to have impact on locally significant non-designated archeological remains.

'It is considered that the proposed development will not impact on the significance of any designated built heritage assets or the ability to appreciate them.'

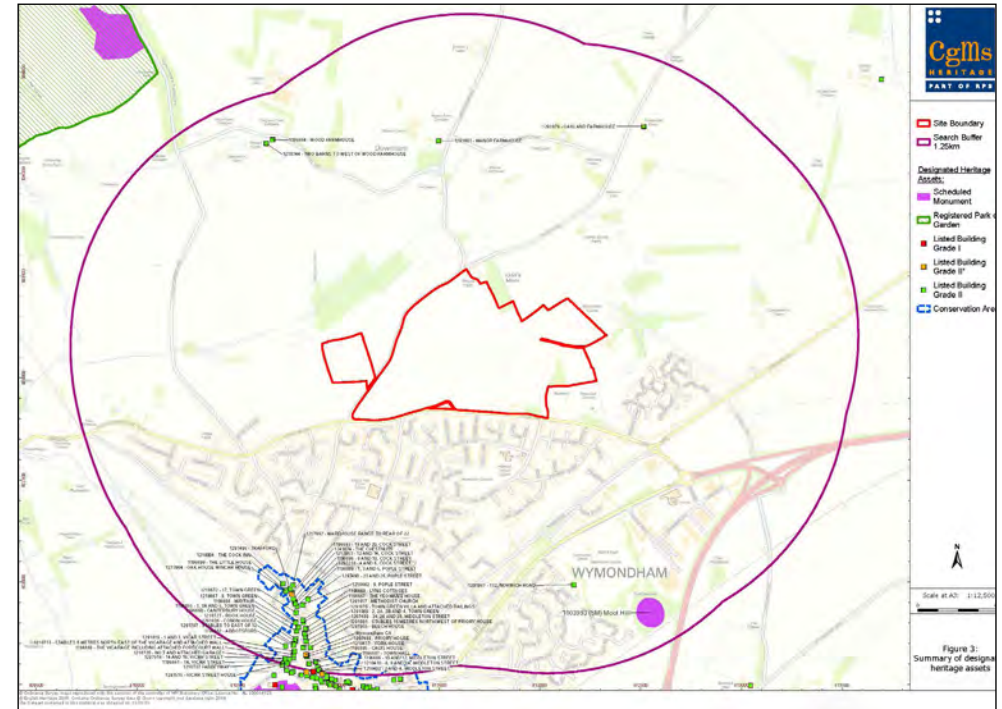


Figure 22; Designated Heritage Assets

Accordingly, there are no heritage constraints identified which would preclude the promotion of the site through the Greater Norwich Local Plan. The Assessment has established that the archaeological interest identified at the study site could be secured by an implementation of a program of archaeological mitigation measures in advance of redevelopment.'

6.5 UTILITIES

AECOM have produced a Utilities Assessment which identifies whether any existing utilities are a constraint for the development of the site and, should that be the case, provide guidance and a strategy to address capacity issues if necessary.

There are no gas apparatus within the site, but there is a network of low pressure (LP) gas mains serving Wymondham, south of Tuttle Lane East. This may require lowering or additional protection measures to enable site access.

A number of electricity distribution apparatus are located within the site. Some may need diversion to accommodate development and would also require integration with two new suppliers and four new substations.

Anglia Water records shows a 10inch asbestos cement water main along Tuttle Lane East. A 3 inch (75mm) cast iron main is present adjacent to Melton Road which appears to provide supply to Mayes Farm to the north of the site.

BT Openreach records confirms the presence of existing overhead and below ground telecoms apparatus. There is also a ducted route present adjacent to the existing farm track adjacent to Tuttle Lane. In addition to the above, Mast Data have confirmed the presence of an operational mobile phone mast located to the north of Wymondham Garden Centre. Minor works to divert or lower the existing duct in the farm track adjacent to Tuttle Lane may

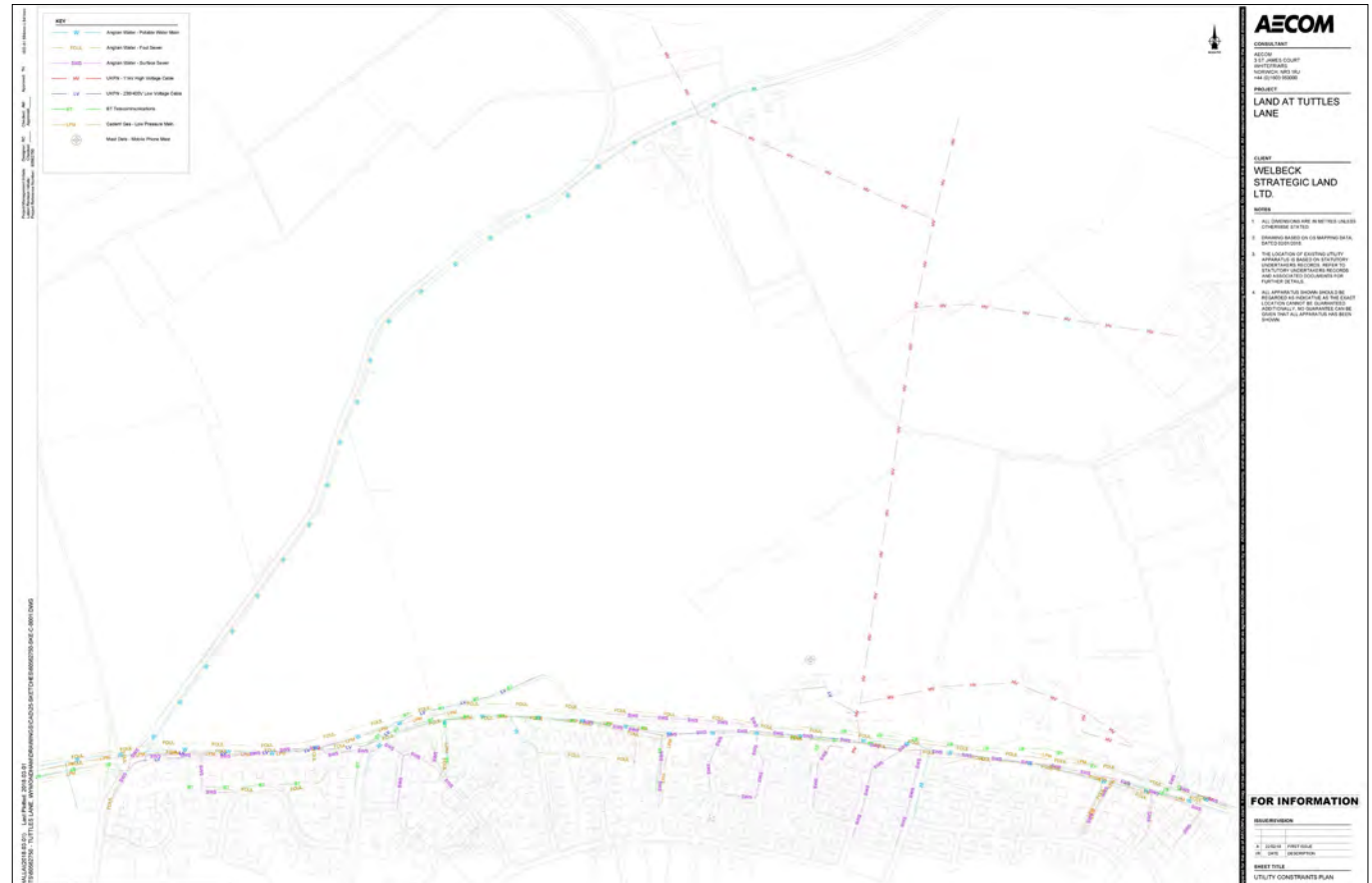


Figure 23; Utilities Constraints

be required if affected by site access works. At the frontage of Tuttle Lane, within the site, is located a gravity foul sewer. The sewer receives flows from 2 no. foul rising mains located in Tuttle Lane to the east of Grove Farm.'

Given the site topography it is expected that an on-site pumping station will be needed in the northern and western corners of the site.





7.0

DEVELOPING A VISION

This chapter proposes a suitable vision strategy for the site, including opportunity and constraints, a masterplan strategy and development brief in accordance with the local plan policy.

7.1 OPPORTUNITIES AND CONSTRAINTS OF THE SITE

The following is a summary of the established opportunities and constraints of the site, with reference to Figure 24.

SITE BOUNDARIES

- **Southern Boundary** - The site fronts onto the northern edge of Wymondham, which lies across Tuttle Lane to the south of the site.
- **Eastern Boundary** - Treatment of the eastern site boundary is a key consideration in order to protect the amenity of the existing farm, residential properties and Wymondham Rugby Club which overlook the site. Also, in order to protect and enhance the existing block of woodland and mature hedgerows.
- **North Western Boundary** - The north western site boundary borders onto Melton Road. The proposed treatment of this boundary is a key consideration due to the open aspect onto arable land to the north.
- **Green Corridors** - A Local Green Infrastructure Corridor borders the northern site boundary and a Neighbourhood Green Infrastructure Corridor follows the southern site boundary and cuts through the western portion of the site. Protection and augmentation of these corridors is a key consideration.

LEVELS & DRAINAGE

- The site levels fall from Tuttle Lane East towards the north eastern site boundary. Ditches and ponds located in this part of the site retain surface water from the arable fields. This existing process of drainage should inform the SuDS strategy for the site.

ACCESS & CIRCULATION

- A public right of way crosses the site to the west, linking Tuttle Lane West to Melton Road. This is a particularly sensitive feature due to its additional green corridor designation.

LAND USE

- The land is made up of predominantly open fields currently used for agriculture, with the exception of the garden centre business located on Tuttle Lane East.

VEGETATION

- The majority of existing vegetation is located along the site boundaries, with some significant woodland blocks and mature hedgerows positioned to the east. These features provide habitat space and help to contain views within the site boundary.



LEGEND












-  Site Boundary
 -  Drains and ponds
 -  Sensitive boundaries
 -  Woodlands and hedgerows
 -  Local Green Infrastructure Corridors
 -  Neighbourhood Green Infrastructure Corridors
 -  Public right of ways
 -  Access and links
- Surface water flooding risk based on Flooding and Drainage Note (February 2018) by Cannon Consulting Engineers:
-  High probability
 -  Medium probability
 -  Low probability

Figure 25; Opportunities and Constraints

7.2 MASTER PLAN STRATEGY

Figure 25 opposite shows the masterplan strategy which has been informed by the technical work and opportunities and constraints analysis of the site.

The key features of the master plan include:

- **New Homes, Schools and a Local Centre** - The proposed masterplan strategy provides around 34ha of developable area including approximately 800 new dwellings, a primary school, a sixth form secondary school and a new local centre.
- **Green Infrastructure** - Introduction of a continuous green corridor along the northern boundary of the site providing a buffer to Melton Road whilst retaining views out to the north and west. This will follow the designated Local Green Infrastructure Corridor.
- Provision of a continuous green edge along the southern site boundary bordering onto Tutttles Lane and along the north-south PRoW. These green links follow the designated Neighbourhood Green Corridors.
- **Highways and Access** - Two access points into the site are proposed off Tutttles Lane from the south, with the primary access being centrally located.
- A looped highway layout provides access around the main body of the site, with secondary access roads serving other parcels of development.
- Two new bus hubs are also proposed along Tutttles Lane with pedestrian friendly links to support access.
- **Walking and Cycling Routes** - Existing PRoW routes will be retained. A cycling and walking route is proposed alongside the main highway. The proposal creates a much more open site with access routes and green corridors working in harmony with one another.
- **Public Open Space** - Publicly accessible green open space is proposed throughout the site, connecting along infrastructure corridors providing accessible space for all residents. Play spaces are strategically located within required walking distances covering the entire site.
- **Sustainable Urban Drainage Systems** - SUDS are used across the site informed by the site analysis and initial flood and drainage work. Existing land drains and low lying areas are proposed for the retention and storage of water during periods of heavy rainfall. Ecology measures can be incorporated alongside the functional requirements of these features.

BASFORD POWERS, WATERMAN AND STERLING FINDINGS

Basford Powers, Waterman and Sterling were appointed to provide transport and highways advice to inform the proposed master plan strategy for the site.

Discussions have taken place with key transport stakeholders to inform the master plan, with a number of key points made including the following:

- the importance of future-proofing potential inter-site connectivity with the adjacent development site;
- the proposed Site access strategy to include two vehicular access points on to Tutttles Lane;
- the need for an off-street footway/cycleway within the site running north/south parallel with Melton Road, providing a link to Hewitts Lane;
- up to 4m wide shared footway/cycle way along the north side of Tutttles Lane;
- the provision of high quality pedestrian links to new bus stop infrastructure proposed; and
- fully provide for electric vehicle (EV) charging infrastructure.

All of the above points have been fully incorporated into the sites master plan strategy.



LEGEND







-  Site Boundary
-  Drains / ponds
-  Woodland & hedgerows
-  PROM
-  Site Access
-  Main Road
-  Secondary Road
-  Potential Access Link
-  Buffer Planting
-  POS
-  GI Corridors
-  Developable area
-  Primary / Sixth Form School
-  Local Centre
-  Recreational Route
-  NEAP / LEAP (400m Walkable Distance)
-  Proposed Bus Hub
-  Drain / Swale
-  Potential Attenuation / Low Point

Figure 26; Masterplan Strategy

7.3 DEVELOPMENT BRIEF

Total Site Area	53.31 hectares			
DEVELOPMENT TYPE	Area (Hectares)	Area (SQM)	Area % of Total Site	No. of Dwellings @ 35dph
Developable Area	33.84	338,400	63.47%	-
Road infrastructure (12% of Total Site Area)	6.4	64,000	12%	-
Housing Area	22.85	228,500	42.86%	800
Primary School	2.08	20,800	4.14%	-
Sixth Form Secondary School	2.50	25,000	4.68%	
Local Centre	0.50	5,000	0.93%	
Public Open Space Provision	11.6	116,000	21.75%	-
Vegetative Buffer	6.04	60,400	11.32%	-
Area Not Developable (existing woodland)	1.21	12,100	2.15%	-
OPEN SPACE POLICY REQUIREMENT (Wymondham AAP)	No. of hectares per 1000 people	Indicative No. People (800 x 2.4)	Open Space (Ha)	
			Requirement	Provided (11.6 + 6.04 ha)
Formal open space	0.98	1,920	1.88	
Children's and young people's play	1.96	1,920	3.76	
Natural/Semi-natural green space	5.08	1,920	9.75	
Total Open Space Provision (Hectares)			15.39	17.64

The indicative development brief provides approximately 800 dwellings across the 22.85 hectares of proposed development land for housing, resulting in a density of 35 dph.

The Wymondham AAP includes policy requirements for public open space. These figures are shown in the development table opposite, as the number of hectares required per 1000 people. The policy also highlights the lack of three particular types of open spaces within the existing Wymondham settlement: formal open spaces, children's and young people's play and access to natural/semi-natural green spaces. These are defined as follows:

- **Formal Open Space** (formal parks, areas for community events and areas for sports/recreation – other than formal pitches) – Formal open space sites provide accessible, high quality opportunities for a range of informal recreation, formal sporting opportunities and community events.
- **Children's and young people's play** (equipped areas, skate parks, etc) – Provision for children and young people consists of equipped play areas and specialist provision for young people, including skateparks, multi-use games areas (MUGA's) and Teen Shelters. The provision of facilities for children and young people is important in facilitating opportunities for physical activity and the development of movement and social skills. Provision for children's play is sub-divided into categories in line with the National Playing Fields Association play area categories. These include Local Areas of Play (LAP), Local Equipped Areas of Play (LEAP) and Neighbourhood Areas of Play (NEAP).

- **Natural / Semi-natural green space** (woodlands, commons, wildlife areas) – Natural and semi-natural green space has been categorised into woodland, commons, and natural green space.

It should be noted that the provision of Natural/Semi-natural green spaces is not limited to the proposed vegetative buffer, woodland and wildlife areas will be incorporated in the overall proposed public open space strategy.

In addition to Wymondham AAP policies, the following play requirements have also been considered.

PLAY ENGLAND

Local Equipped Area for Play (LEAP):

- Min area 0.04ha
- Max walking distance 400m
- 10m to the boundary of the nearest property / 20m to the nearest habitable living space

Local Area for Play (LAP):

- Min area 0.01ha
- Max walking distance 100m

GUIDELINES FOR RECREATION PROVISION IN NEW RESIDENTIAL DEVELOPMENTS (SEPTEMBER 2018)

Childrens Playspace for developments of over 50 dwelling:

- Min area 0.04 - 0.2ha (as appropriate)
- Max walking distance no more than 200m from any dwelling served
- To include an area of hard playing surface to one third of the total for 0.1ha areas
- To include items of suitable play equipment (3 or more items)

7.4 INDICATIVE FRAMEWORK PLANS

LAND USE

Approximately 43% of the overall site is proposed for housing development (22.85ha) which could deliver approximately 800 new dwellings. A number of housing parcels are identified as well as a new local centre and a primary and sixth form secondary school all set around the proposed green infrastructure. Each area should be characterised by a specific set of design principles based on the relationship with the surrounding landscape, built form and location within the site. The area of each development parcel is outlined below.

- D1 - 5.68ha
- D2 - 2.74ha
- D3 - 2.46ha
- D4 - 1.97ha
- D5 - 0.66ha
- D6 - 4.63ha
- D7 - 2.88ha
- D8 - 1.83ha

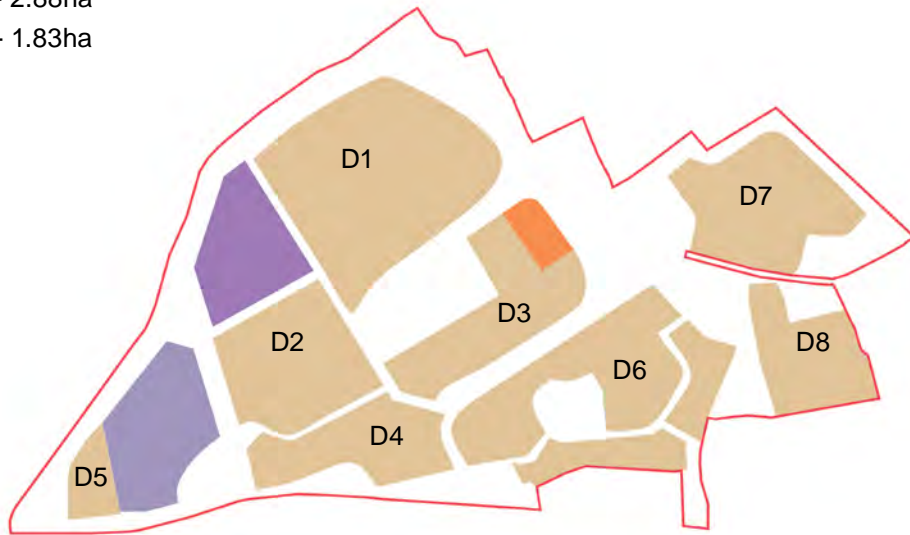


Figure 27a; Framework Plan - Land Use

ACCESS AND INTERNAL CIRCULATION

The site access is located on Tutttles Lane East, mirroring the existing access into Wymondham to the south. The location of the two access points will provide clear visibility and safe access into the site.

A primary looped highway with cycle and pedestrian routes is proposed to provide the main route around the site. This highway would be integrated alongside the green and blue infrastructure layout. Secondary roads serving development plots are looped where possible to avoid cul-de-sac arrangements.

A potential link to the neighbouring site to the north east is also shown which could provide a future bus route through to this development.

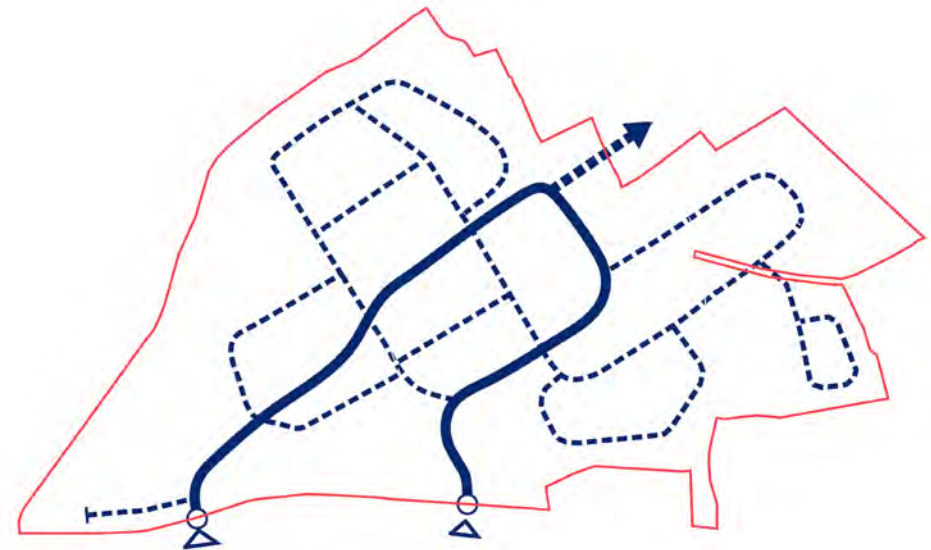


Figure 27b; Framework Plan - Roads and Access

PUBLIC OPEN SPACES

A network of publicly accessible open space is proposed throughout the site, serving all users of the development. Walking and cycling routes are proposed, to work together with this green infrastructure.

Children's play space is proposed at strategic locations to offer compliant access for all users.

SUDS features are also positioned within the open space network.




Figure 27c; Framework Plan - Public Open Spaces

PROPOSED BUFFER PLANTING AND GREEN INFRASTRUCTURE (GI)

A woodland buffer is proposed along sensitive boundaries where visual and landscape constraints have been identified. This specifically applies to Melton Road and the north-eastern edge of the site and works together with the Local Green Infrastructure Corridor designation.

Melton Road and Wymondham FP6 footpath are identified in the Wymondham Area Action Plan as Neighbourhood and Local GI corridors, therefore enhancements to these green corridors is proposed. Existing hedgerows and specimen field trees along these routes are proposed for retention.

 Existing woodlands and hedgerows


 Proposed buffer planting



Figure 27d; Framework Plan - Buffer planting and GI





8.0

CONCLUSION

This chapter concludes the findings of the report and makes recommendations for next steps.

8.1 CONCLUSION AND RECOMMENDATIONS

Land North of Tuttle Lane East, Wymondham, has been the subject of a contextual analysis encompassing the site and its surrounding area, which, when combined with a baseline mapping and visual study, informs the opportunities and constraints of the site.

The defined opportunities and constraints have subsequently informed the masterplan strategy and concept masterplan proposals for the site, which aim to create a sustainable and contextually appropriate extension to Wymondham.

The following are a series of conclusions regarding the master plan:

CONTEXT - The built form of the existing village has been carefully considered when positioning development within the site boundary, with consideration given to the existing dwellings and issues of overlooking. The resulting proposal creates a sensitive extension to the north of Wymondham with a green frontage onto Tuttle Lane.

DENSITY - The master plan achieves approximately 800 new dwellings across a circa 54ha site, resulting in a gross density of 35dph. This is reflective of the local context.

ACCESS & ROADS - Access to the site is proposed at two locations off Tuttle Lane. The internal road network flows from the main circular road. A pedestrian and cycle route is proposed around the main circular road and will also provide pedestrian friendly access to two new bus hubs to be located along Tuttle Lane.

OPEN SPACE - Areas of public open space incorporating Children's Play Space, are positioned to form a continuous network. This will provide equitable access for all residents. A circular route around the site is proposed for use by the community of Wymondham.

VEGETATION - A wide open space is proposed alongside Tuttle Lane, to include hedgerows and field trees, creating an appropriate settlement edge.

A comprehensive planting scheme will increase habitat opportunities throughout the site from the existing agricultural use. The strategy will work alongside the retained hedgerows, trees and drainage elements.

GREEN INFRASTRUCTURE CORRIDORS - The Local and Neighbourhood Green Infrastructure Corridors will be significantly enhanced through implementation of new woodland corridors along these routes.

APPEARANCE AND STYLE - Any proposed development to be brought forward should be approached sensitively, ensuring appropriate references are drawn from the surrounding residential context, and constructed in a contemporary manner, avoiding pastiche.

RECOMMENDATIONS

In summary, we believe the masterplan proposals offer the following benefits:

- The development proposals will provide up to 800 new dwellings, utilising a policy compliant mix, including social housing provision.
- Proposals will include the provision of a new primary school, sixth form secondary school and local centre.
- The development will provide new facilities for the people of Wymondham, including accessible walking routes, public open space and Children's Play facilities. These are all identified features which Wymondham lacks.
- The development will serve to work with and enhance the Green infrastructure strategies of Wymondham and South Norfolk; and
- The site location is sustainable, within easy access of essential facilities and services in Wymondham.

APPENDIX A

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