

Greater Norwich Local Plan

Land at Harford, Norwich

Representations to Stage C Regulation 18 Consultation in Respect of GNLP3047

March 2020



Issue Sheet

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Representations to Stage C, Regulation 18 Consultation

Prepared by:

Signature:

Name: Ian Douglass

Title: Head of Planning

Date: March 2020

Approved by:

Signature:

Name: Philip Atkinson

Title: Director

Date: March 2020

Contents

- 1 INTRODUCTION**
- 2 PLANNING CONTEXT**
- 3 THE SITE IN CONTEXT**
- 4 MARKET DEMAND, NEED AND SUPPLY**
- 5 EMERGING MASTERPLAN**
- 6 CONCLUSIONS: THE CASE FOR ALLOCATION**

Appendices

- Appendix 1 – Approved Masterplan Apex Business Park**
- Appendix 2 – Roche Advice**
- Appendix 3 – Site Constraints and Parameters Plan**
- Appendix 4 - Emerging Concept Masterplan**
- Appendix 5 – Landscape Appraisal**

1 Introduction

1.1 Preamble

1.1.1 Lanpro are instructed to promote employment land (GNLP3047) at Harford, South of Norwich, within the emerging Greater Norwich Local Plan (GNLP) (see location plan **Figure 1**).

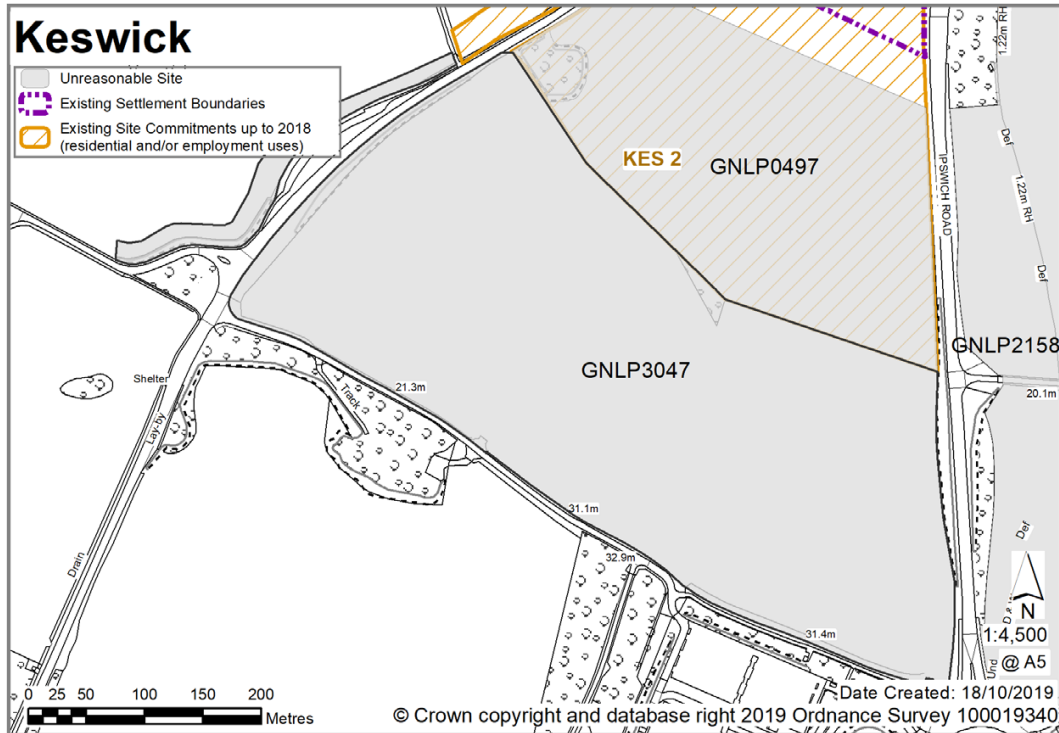


Figure 1. Site Location

1.1.2 Lanpro promoted the site through the GNLP call for sites process in October 2018. The subject site has been identified in the latest version of the emerging local plan (January 2020) as a non-residential 'Unreasonable Site'. The document states:

"This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment sites in the new local plan. This area is outside the planning application boundary for the extended KES2 allocation in the South Norfolk Local Plan."

1.1.3 These representations will establish that the site is sustainably located and represents an important employment opportunity that should be included in the GNLP. We will provide evidence that there will be clear demand for this site over the plan period and that it is needed to meet growth ambitions. We will also establish that there is a need to allocate the site because of a lack of available quality employment land elsewhere, that could come forward over the plan period.

1.1.4 The site extends to 15.4 hectares and is being promoted for a mix of B1, B2 and B8 uses.

1.1.5 The subject site is situated to the south of Apex Business Park. Planning permission was granted for Apex Business Park in 2018 from South Norfolk Council (2017/2794). See the approved Masterplan for Apex Business Park at **Appendix 1**.

1.2 Purpose of this Document

1.2.1 This document will demonstrate that site is suitable for allocation in the GNLP. We will:

- describe the planning policy context;

- describe the site location and context;
- identify market demand for this site and the need for quality employment land;
- describe the emerging masterplan for the site;
- explain why the site is suitable for allocation in terms of landscape effects, access and other technical matters; and set out our case for allocation.

1.2.2 This report should be read in conjunction with previous submissions which confirmed the extent and potential development parameters of the site (see **Figure 2** below).

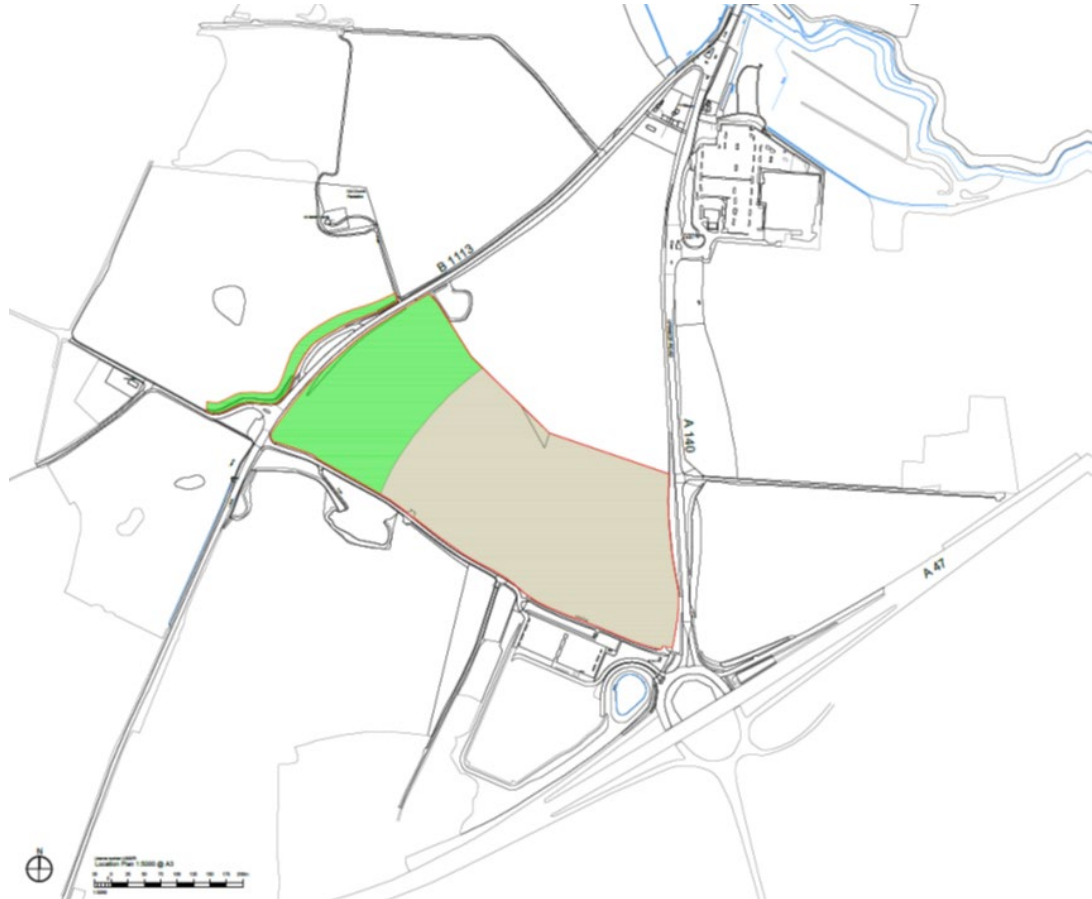


Figure 2. Site Location / Potential Development Parameters

2 Planning Context

2.1 National and Local Planning Policy

2.1.1 The latest version of the National Planning Policy Framework was published in February 2019. It states:

Paragraph 8. – *"Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure....."*

Paragraph 80 and 81: - *"80. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.*

81. Planning policies should: a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period....."

82. Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations."

2.1.2 In respect of the rural economy, paragraph 83 states:

"Planning policies and decisions should enable:...a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings...."

2.1.3 Policy DM 2.1 of the adopted South Norfolk Local Plan states:

"Employment and business development

Development proposals which provide for or assist the creation of new employment opportunities, inward investment and / or provide for the adaptation and expansion of an existing business will be supported unless there is a significant adverse impact in terms of Policies DM 1.1, 1.3 and other policies of the Local Plan."

Proposals for new sites in the Countryside will be assessed against the policies of the Local Plan, with positive consideration given to proposals that Create accessible jobs and business opportunities in the rural area."

2.2 The Greater Norwich Local Plan and its Growth Strategy

2.2.1 The GNLP Strategy document, in respect of the economy and employment sets out a range of matters:

"Economic growth needs to be encouraged in the right locations, providing opportunities for businesses to expand or relocate to our area, encouraging innovation and building on our strengths, particularly in the agri-tech and scientific sectors." (Foreword)

"The GNLP should support the growth of a wide ranging and changing economy, ranging from high tech businesses with the capacity for major growth through to smaller rural enterprises."
(Para 60)

"Most of the jobs growth we expect to see will have been delivered on strategic sites in and around Norwich with good access to public transport, the major road network and a comprehensive cycling network. This will have contributed to the growing national importance of the Cambridge Norwich Tech Corridor and strengthened Norwich's role as the regional capital."
(Para 113)

2.2.2 We note that the employment growth target is stated in the GNLP Strategy Document as 33,000 jobs for the plan period. Paragraph 55 states that 29,100 jobs were delivered 2011-2018. The previous regulation 18 Growth Strategy consultation suggested a target of 45,000 jobs for the new plan period based on the East of England Forecast Model (EEFM) and City Deal (13,000 more than JCS target). The GVA Grimley Study 2017, which forms part of the evidence base to the plan, suggested 44,000 jobs would be needed. There is no explanation in the draft document for the significant reduction other than it is based upon the EEFM. This should be explained and justified. Again, it would appear that the additional 'above target jobs growth' agreed through the City Deal has not been included. The 33,000 figure seems unambitious in the context of the Vision set out for the Cambridge Norwich Tech Corridor and the number of jobs previously delivered in the 7 years to 2018.

2.2.3 We note from the *Greater Norwich, Employment, Town Centre & Retail Study, Strategy Advice December 2017* report (prepared by GVA and which is an evidence base document for the emerging GNLP) that a range of 'key assets' should form the focus of future economic activity (i.e. locations and sites), namely:

- Norwich City Centre
- Vulcan Road/Fifers Lane
- Longwater
- Hall Road/Bessemer Road
- Airport Business Park (both the existing and allocated sites)
- Norwich Research Park
- Broadland Business Park
- Sweetbriar Industrial Estate
- Land at Diss
- Land at Hethel and Wymondham
- Food Enterprise Zone, Honingham
- Rackheath

2.2.4 The plan allocates employment sites totalling around 360 hectares including land on the strategic sites referred to above.

2.2.5 Notably, at paragraph 3.44 of the GVA 2017 report. It states:

"The Norwich urban area extends beyond the city centre, accommodating a diverse array of economic activity within its various business parks, industrial estates and specialist facilities. Often these sites make a distinct offer to businesses which, given the scale of each, is likely to direct the future nature of activity and development. As such infill, intensification and redevelopment of the existing estates will act as important locations for a range of activities, however, may offer few options to diversify the existing portfolio." (Our underlining)

- 2.2.6 Norfolk County Council's Employment Land Monitoring Report 2018-2019¹, states that whilst there may be in excess of 400 hectares of monitored employment land ('monitored land' is land without planning permission) there are only 48.4 hectares of employment land with outline planning permission across the County. Clearly, in itself, land with outline planning permission can be speculative in nature.
- 2.2.7 In summary, we submit, that the emerging GNLP will be reliant upon an employment land supply that is not flexible or diverse enough; that is not ambitious enough; is made up of key sites which either have infrastructure constraints to delivery, or have other environmental constraints to expansion; and as such the emerging GNLP plan will conflict with the NPPF and is unsound.

¹ <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use-policies>

3 The Site in Context

3.1 Site Location and Context

- 3.1.1 The site represents an opportunity to build on an existing employment allocation at Harford / Keswick (KES2)² (see **Figure 3** below) and the proposed extensions to KES2 which is a preferred allocation in the emerging GNLP (see GNLP0497 at **Figure 1** previously).

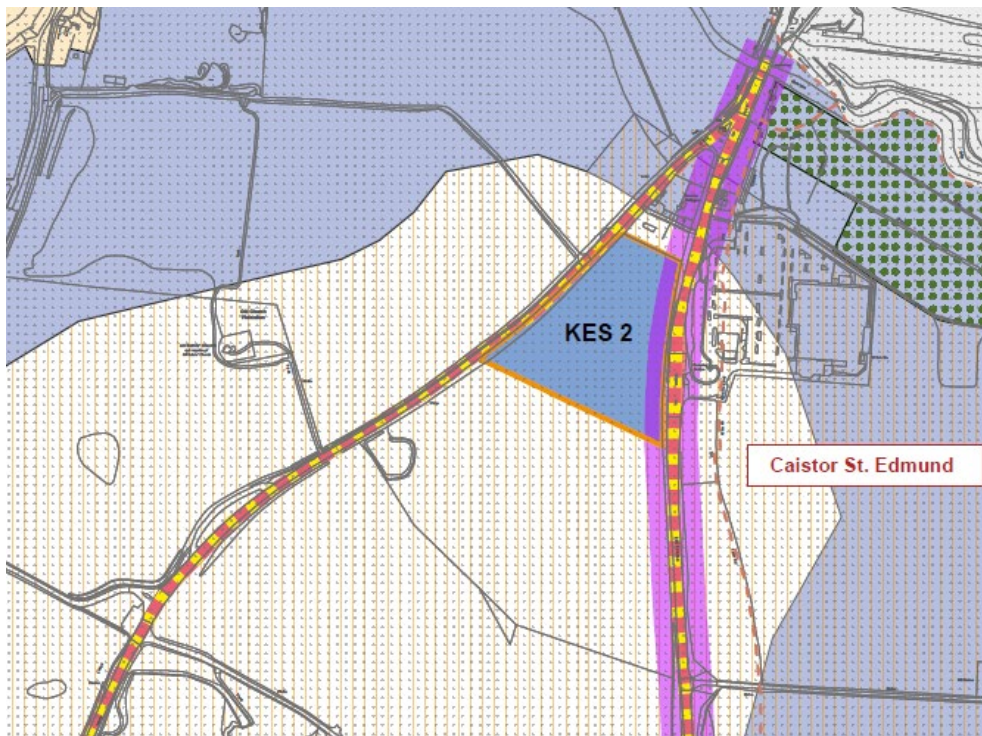


Figure 3. KES2 (extract from the South Norfolk Local Plan adopted 2015)

- 3.1.2 KES2 and the land subject of GNLP0497 (known as 'Apex Business Park') is the subject of planning permission for:
- "Proposed employment development consisting of B1, B2 and B8 uses, associated access and landscaping; and proposed link road between the A140 and the B1113, including new roundabout with some matters reserved"* (South Norfolk Council Ref: 2017/2794).
- 3.1.3 The site extends to 15.4 hectares. It is situated on the urban fringe and to the south of Norwich within South Norfolk District and currently consists of Arable fields. It is bounded by the B1113 to the west; the A140 to the east; the country lane leading from the B1113 to the Harford Park and ride and the park and ride facility itself, to the south; and the land associated with 2017/2794 to the north.
- 3.1.4 The wider landscape is occupied by arable fields; small parcels of woodland and scrub; trunk road / highway infrastructure including the A47 and A140; overhead power / transmission lines and pylons (including those that run across the northern boundary of the site); and substantial urbanising development namely the Tesco supermarket and the Park and Ride.
- 3.1.5 The village of Keswick is located approximately 550m west of the site.
- 3.1.6 The landform sees a relatively smooth rise from the north east corner with lowest point around the contour of 21 AOD, then rises gently towards the south east to meet the contour of 30 AOD before it drops to 25 AOD at Harford Interchange / Park and Ride. Hedgerows are present along the field boundaries. The site does not have any Public Rights of Way (PROW) or bridleways crossing it. There is a PROW (Keswick BR7) from the B1113 to Keswick Mill.

² 4 Hectares of Employment Land are currently allocated at this location through Policy KES2 in the adopted South Norfolk Local Plan.

- 3.1.7 The site is not within a designated site / area in regard to landscape or nature conservation and does not accommodate any Scheduled Monuments or Listed Buildings.

3.2 The Highway Network and Access

- 3.2.1 The site is situated at a highly desirable location from a commercial perspective, in close proximity to the A47 trunk road, with access beyond to the A11; and in close proximity to the A140 one of the main arterial routes into Norwich.
- 3.2.2 The A47 is the main east-west link road in the Greater Norwich area and connects to Great Yarmouth and Lowestoft to the east. The site will likely be accessed via a dual access - namely one access from the Park and Ride access road; and one access through the Apex Business park.

3.3 Site Characteristics

- 3.3.1 The site is mainly arable with an improved grass margin and species poor hedgerow boundaries consisting exclusively of Hawthorne (*Crataegus monogyna*). The dominant species for trees identified within the site are young to mature Oaks (*Quercus robur*), Ash (*Fraxinus excelsior*), Blackthorn (*Prunus spinosa*), English Elm (*Ulmus minor 'Atinia'*), Hawthorne (*Crataegus monogyna*) and some clashes of Field Maple (*Acer campestre*) and Sycamore (*Acer pseudoplatanus*).

3.4 Landscape

- 3.4.1 A Landscape Appraisal accompanies this representation. As part of this work, the 'South Norfolk Local Landscape Designations Review Landscape Character Areas & River Valleys in the Norwich Policy Area' (Chris Blandford Associates September 2012) and 'Norwich Southern Bypass Landscape Protection Zone' (Chris Blandford Associates November 2012) were reviewed to gain an understanding of the local landscape character areas and the Norwich Southern Bypass Landscape protection zone and assess their sensitivity to change.
- 3.4.2 The site falls within the landscape character areas of Yare Tributary with Parkland (C1); Tas Tributary Farmland (B1); Yare Valley Urban Fringe (F1) and in close proximity but outside Tas Rural River Valley Extends (A1).

3.5 Summary

- 3.5.1 The site is sustainably located in close proximity to the urban area of Norwich and the highway network.

4 Market Demand, Need and Supply

4.1 Background

4.1.1 Market evidence of demand for employment land / units has been provided by Roche Chartered Surveyors (see **Appendix 2**). In addition, they have identified some of the shortcomings in respect of the supply of employment land in the GNLP area.

4.1.2 The Local Plan evidence base recognises there is a robust demand for office, industrial and retail units in Greater Norwich (across Greater Norwich, vacant and available industrial and office floor space has fallen over recent years whilst occupancy rates have risen). Sectors such as food, health, logistics, Knowledge Intensive Business Services (KIBS) and technology are likely to show increasing demand for floorspace and sites in Greater Norwich. There is a recognised shortage of good quality industrial stock which may restrict the sub region in meeting its growth potential.

4.1.3 It is considered that the GNLP now needs to recognise that there are weaknesses within the identified employment land supply pipeline set out within the emerging GNLP document, and the opportunity to capitalise on sustainably located and deliverable employment land, that can be made available to the market promptly (such as the site subject of this submission), should not be lost.

4.1.4 In December 2016 it was anticipated that there would be a shortage of good quality industrial retail stock which may lead to the sub region not meeting investment potential. Vacant and available industrial office and floorspace had fallen and occupancy rates had risen. In addition, business use class floorspace was being lost to Permitted Development schemes (and continues to be). There are recent examples of the desire to invest in Greater Norwich such as the completion of large industrial units in Wymondham.

4.1.5 Norwich has a series of allocated/opportunity sites proximately located to existing sites to support expansion and sector specific growth. As hinted at in section 2 of this report, many of the long-allocated employment and development sites in the Greater Norwich area have an infrastructure deficit (amongst other constraints) which is fettering their ability to come forward.

4.1.6 The critical factors that facilitate the take up and delivery of employment land range from land value; siting and location; demand; and infrastructure provision / cost of servicing.

4.1.7 Numerous of these factors affect many of the currently allocated sites within the Greater Norwich Area. The emerging local plan seeks to allocate 360 hectares of employment land. When balanced against identified demand as set out in the evidence base ('enhanced scenario' of 114 hectares over the plan period) would suggest that there is the potential employment land to meet demand 3 times over.

4.1.8 In our view this assessment is clearly too simplistic and the figures within the emerging plan are overoptimistic and should be treated with caution.

4.1.9 In 2018 in our representations to the GNLP we noted:

"In respect of the allocated sites....., numerous of these sites have inherent problems that hinder their delivery such as infrastructure constraints; poor land values; landownership models. In addition, many of these sites whilst allocated, are situated in rural and potentially unsustainable locations. This is evidenced in the GNLP Annual Monitoring Report March 2018 that is unable to demonstrate meeting targets in respect of newly permitted B1, B2 and B8 floorspace and which shows there has been a sustained loss of employment floorspace in Norwich across all use classes. As such, these factors do not apply to the site subject of this submission.

In addition to the AMR assessment, commercial agents report the following trends in the take up of 'industrial' buildings in Norwich:

Since 2012, as we have seen a general economic recovery, there has been increasing take up of industrial land with very little new supply.

There is a large amount of what is termed '2nd hand poor' floorspace on the market.

There has been no new Grade A office supply since 2013.

As supply decreases, the market is / will become constrained.

The bulk of demand is for units of 1, 000 - 2,000 sq. metres of floorspace (and where there appears to be a lack of supply).

It is considered that going forward the GNLP now needs to recognise that there are weaknesses within the identified employment land supply pipeline as set out within the current and emerging Local Plan, and the opportunity to capitalise on sustainably located and deliverable employment land, that can be made available to the market promptly (such as the site subject of this submission), should not be lost. A wide range of good employment sites need to be maintained to not only attract new business to Norwich but also to retain existing ones, who may be considering relocating (the loss of Colmans is particularly pertinent to this final point).

We note that the GNLP evidence base does acknowledge this problem (Employment Land Assessment (GVA December 2017), paragraph 7.10) which states that whilst a large quantity of land could potentially be available for employment use, it is the quality of this land that is key and its ability to meet demand from different growth sectors.

The site subject of this submission is sustainably located with good transport links and will be able to take advantage of different market sectors."

- 4.1.10 Further and updated information is provided by Roche Chartered Surveyors in the next section of this report.

4.2 Demand, Need and Supply

- 4.2.1 This section of the report addresses progress on the Apex Business Park to the north, market interest in this site to date, and the general demand for employment sites in the locality.

- 4.2.2 Both Apex Business Park and the subject site are located to the south of Norwich city centre, off Ipswich Road (A140) and sit in one of the most accessible locations for both the city and the A47. Other employment sites which are closer to the A47 or within similar distance, such as Broadland Business Park and Bowthorpe, are substantially further from the city centre and the main concentration of population. This is why White Lodge Industrial Estate has performed so well over time, with accessibility to both the city centre and the A47.

- 4.2.3 The benefit of the Apex Business Park is not only its geographical siting but the fact that new properties are to be constructed. Minimum energy efficiency regulations are now driving buildings to be more efficient and there are a number of corporate occupiers and institutional landlords who require premises with EPC ratings of A-C rather than traditional warehouse and industrial premises of E, F or G banding. Lower running costs and more energy efficiency will drive larger corporates to seek new premises. Accessibility to their key markets will also be important, thereby making central locations to both the major road network and the population areas important. The Apex benefits from its location considerably.

- 4.2.4 In respect of present demand on the Apex Business Park, there is interest from a number of businesses as set out below:

- Builders' merchant – 2 acres for premises and yard.
- Steel manufacturing business – 1.5 acres for building and yard.
- Food distribution business – 5 acres for yard and premises.
- Gas maintenance and design business – 1 acre for premises and yard.
- General enquiry for 3,000 – 5,000 sq. ft. units (6 in total) - requiring 1 acre for yard and premises.

- 4.2.5 The above total approximately 10.5 acres. When considering the fact that the development has not commenced on the business park, it is reasonable to assume that take-up of the space will occur within a short period of time due to the popularity of the location. The present site has a total area of 30 acres and allowing for roads and landscaping, there is a net developable area of

approximately 17.8 acres with strong interest in 58% of the land already. Based on the interest there is, Roche assume that by 2030 the land will be fully developed out. Other land within the marketplace is available but this is limited to:

- Broadland Business Park – There are a number of acres available here, but this is a less favourable location due to its distance from the city centre. The take-up has been limited over the past 2-3 years.
- Broadland Gate – The majority of this land is now under offer or sold.

4.2.6 Other land to the north of the city at Norwich Airport is not ready for development at the present time, nor is the land being promoted adjacent to the A140 and A1270.

4.2.7 Observations on some of the other preferred employment sites identified in the emerging plan, are:

- South of Norwich Research Park (x2 sites, Refs: GNLP0331R-B and GNLP0331R-C). 6.85 Ha are identified in total to allow additional capacity up to 2038 for the continued growth of the allocated science park and hospital expansion proposals. The site is therefore not appropriate for traditional B1, B2 and B8 employment use.
- Norfolk Showground, Easton (GNLP2074). 76.66 Ha are identified for Food, farming, leisure, tourism, recreation, arts, exhibition. The site is therefore not appropriate for traditional B1, B2 and B8 employment use.

4.2.8 There is, therefore, limited availability of land for occupiers to construct on, especially benefiting from strong geographical position and having the opportunity to construct modern units to present building regulations. Roche advise that demand will outweigh availability of space at the Apex by 2030. With environmental issues forcing occupiers to consider their carbon footprint, new build properties offer sustainable and carbon neutral options.

4.2.9 A second phase of employment development here (i.e. the subject land) would consist of similar uses, i.e. B1, B2 and B8 and as with the present interest, the occupiers will be a combination of SME`s and corporate occupiers. The availability of both freehold and leasehold properties adds to the attraction of the site. A number of employment development sites in the GNLP area are focused on either freehold or leasehold tenure, but not both.

4.2.10 Over the past 12 months, take-up of industrial property has been in the region of 280,00 sq. ft. and existing stock is in the region of 741,800 sq. ft., with demand standing at 591,500 sq. ft. The biggest single property is Carrow Works which is 179,787 sq. ft. and forms part of a development site and is only available on a short-term basis. Based on the available supply and the demand, the two are almost identical, when the Carrow Works site is removed.

4.2.11 Furthermore, the demand figure has increased over the last 2 years as businesses have struggled to locate fit for purpose property. Most of the existing stock is now dated and occupiers' expectations and requirements are substantially different to when the majority of property was constructed in the 1970`a and 1980`s. Changes to specification include: greater eaves height, forecourts suitable for loading and unloading, higher quality offices and clean modern space. New, well designed and specified accommodation, in the correct location will be well received by the market. The strong level of occupier demand has led to the first large scale speculative development to occur in Norwich for close to 20 years.

4.2.12 The allocation of additional and suitable employment development land in the emerging local plan, to capitalise on growth potential, is therefore imperative.

5 The Emerging Masterplan

5.1 Description of the Proposals

Overview

5.1.1 An initial site constraints, capacity, and masterplanning exercise has been undertaken to demonstrate how employment uses can be accommodated on the site. The Site Constraints and Parameters Plan is included at **Appendix 3** and the Concept Masterplan is provided at **Appendix 4**. This work has been informed by a Landscape Appraisal prepared by a Chartered Landscape Architect and provided at **Appendix 5**.

5.1.2 A landscape led approach has been undertaken in formulating the masterplan.

Landscaping Approach

5.1.3 As can be seen from the Landscape Appraisal, a range of potential short and long range views into the site have been assessed. The most sensitive views into the site are considered to be from the west.

5.1.4 The landscape mitigation work has focused on creating a dense buffer zone of indigenous tree & shrub planting around the site boundary of 5m minimum width where possible, that will screen the development and enhance the biodiversity of the area.

5.1.5 The existing hedgerows will be retained and enhanced with new native species rich and wildlife beneficial planting at places where the density of the existing rows have started to decline. The hedgerows will be a minimum of 2m high and will form the outer boundary of the buffer zone. Trees 16-18cm girth will be included in the hedgerows where possible to achieve instant screening.

5.1.6 In order to mitigate the sensitive views from the west, a wider zone of woodland planting is proposed, including further tree planting to enhance screening. An understorey layer of native & wildlife beneficial shrub planting will contribute to the environmental qualities of this zone. It is the Developer's intention to extend the visual buffer to the west, by enhancing the existing planting zone off-site, west of the B1113.

5.1.7 The selection of native plant species for the landscape design aims to provide habitat as well as nectar, pollen & fruiting shrub cover, hedgerow and canopy habitat to provide shelter resources throughout the year.

5.1.8 The tree planting of the perimeter, as well as within the boundary buffer zone consists of native tree species that soften the edge of the site and break up the building mass & rooflines. Trees will be selected for their contribution to the ecosystem, as well as their aesthetic value, size, form & colour. To the core of the development, structural tree planting will compliment local species, provide additional habitat, decorate the elevations of new buildings and enhance visual amenity.

5.1.9 The hedges are of strategic as well as of historic importance, accomplishing screening & buffer and at the same time retaining the characteristic hedgerow pattern of rural England. The shrubs & perennials will decorate the elevations of the buildings, define the edges of the paths and ornament the amenity areas with colourful flowers and leaves, adding to their environmental value.

Outline proposals

5.1.10 The site extends to 15.4 hectares. The emerging masterplan incorporates substantial areas of landscaping / landscape screening. The built form will comprise a range of uses to include B1, B2 and B8 with associated internal roads, amenity landscape and landscape buffer planting.

5.1.11 The strategic landscape proposals form an integral part of the development with the reinforcement of the existing site boundaries along with a substantial amount of proposed additional landscape planting to the site perimeters to provide a defined zone of landscape buffer and screening to the development.

- 5.1.12 The constraints exercise and landscape assessment work has informed consideration of visual and landscape character impacts in the on the surrounding area. Taking into account the topography of the site, parameters have been set in respect of siting, scale and mass of the proposed built form; and setting spatial zones and respective heights for the development.
- 5.1.13 Whilst very early in the design evolution stage, there is the potential opportunity to incorporate two central tree lined 'avenues' into the site working with the internal road configuration.
- 5.1.14 The siting of the buildings and their plots have been positioned inbound of the sites perimeter boundary to allow maximum space for landscape enhancement and screening, with internal landscape planting between plots providing further screening of proposed buildings. This helps to break up the mass of buildings and reducing the potential impact on views of the development from surrounding sensitive locations.
- 5.1.15 A range of size of buildings could be incorporated into the layout. The latest market demand advice is for units ranging from 300 sq m to 5,000 sq m but clearly flexibility will be required and which can be facilitated through any outline planning consent.
- 5.1.16 It is considered that the site could yield a substantial amount of employment floorspace.
- Access***
- 5.1.17 Access will be provided through a combination of:
- 1) Upgrading the existing farm access into the site via the Harford Park & Ride access road.
 - 2) Via the Apex Business Park to the north.
- 5.1.18 Apex will deliver a new link road between the B1113 and A140 to create new junction capacity. We understand that there is adequate road capacity locally to accommodate the vehicle flows from mixed employment uses (assuming a balanced mix of class B1, B2 and B8 uses) within the promoted extension area.

6 Conclusions: The Case for Allocation

6.1 Sustainable Location

- 6.1.1 The site is clearly situated in a sustainable location with good proximity to the highway network. The location accommodates substantial existing built form including the Tesco Superstore and the Harford Park and Ride. Allocation of KES2 and approval of 2017/2794 demonstrate further that the location is inherently sustainable.
- 6.1.2 In addition to these developments it is also noted that Norfolk County Council are currently consulting on proposals to locate a new waste recycling centre in the southern part of the Park and Ride site (see **Figure 4** below).



Figure 4. Emerging Waste Recycling Proposals

- 6.1.3 The location is clearly emerging as a hub for a range of commercial, employment and civic uses on the south side of Norwich.

6.2 Employment

- 6.2.1 The site represents an opportunity to build upon and sit alongside existing allocated employment land which has been extended through planning permission 2017/2794. It will contribute to employment land supply in the Greater Norwich Local Plan and help the plan to achieve its growth ambitions.

- 6.2.2 The subject site has the potential to deliver a substantial amount of employment floorspace across B1, B2 and B8 uses which could generate in the region of 900 – 2000 jobs³.
- 6.2.3 Evidence has been provided in this submission that there is substantial demand for well-located employment space on the south side of Norwich, offering sites where bespoke units can be delivered. Evidence has also been provided that the proposed employment land subject of 2017/2794 will be taken up by the market in the middle of the plan period, if not before, and as such, further land needs to be allocated at this sustainable location.
- 6.2.4 Evidence has been provided casting doubt on the soundness of the current employment land supply strategy up in the emerging plan.

6.3 Landscape Impact

- 6.3.1 There is additional landscape capacity beyond the existing approval areas (KES2 and 2017/2794) and the visual and landscape impacts from this new extra land when viewed from the A47 Southern Bypass are able to be managed/mitigated (as established through the landscape work submitted in support of the representations).

6.4 Deliverability

- 6.4.1 There are other benefits and no additional impacts from further planned development within the extension area. Apex business park is understood to be progressing well.
- 6.4.2 Evidence has been provided in this submission of the need to allocate land of this nature to contribute to employment land supply over the plan period. This document has further demonstrated that there are no environmental or technical constraints to development of the site.

6.5 Conclusion

- 6.5.1 As such, we object to the current employment land supply strategy in the emerging local plan and submit that the land subject of this representation should be included in the plan.

³ This is based on a number of floorspace scenarios having been considered across the B1, B2 and B8 uses and calculated using the same average forecasting guidelines as used in the Greater Norwich Employment Growth and Sites & Premises Study (2008). This method assesses the gross floorspace requirements for each use class. This is the same approach as was adopted in the East of England Employment Land Reviews Guidance Manual with the assumption of 18sqm per employee for office space (B1 use), 32sqm per employee for general industrial (B2 use) and 50sqm for warehousing (B8 use).

Appendix 1 – Approved Masterplan Apex Business Park



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Key:

Gross Floor Area 28,329m²

- B1..... 9,443m²
- B2..... 9,443m²
- B8..... 9,443m²

- Application boundary 12.7Ha
- A. Operational Development Area 78,446m²
- B. Green Buffer Area - 48,554m²

PURPOSE OF ISSUE
 MA for Masterplan

DRAWING STATUS
 S2 - Fit for Information

PROJECT TITLE
 0351 Harford

CLIENT
 Heritage Development

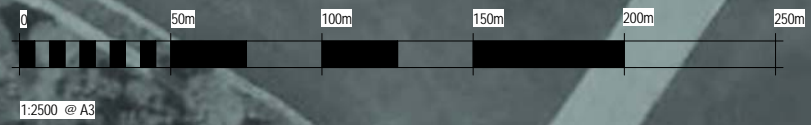
DRAWING TITLE
 Illustrative Masterplan

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DRAWING NUMBER			
PROJECT NO	TYPE	UNIQUE NO	REVISION
0351	- 00	- 401	-



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Appendix 2 – Roche Advice

6th March 2020

P Atkins Esq.,
Lanpro
Brettingham House
98 Pottergate
Norwich
Norfolk NR2 1EQ

CHARTERED SURVEYORS

56 Thorpe Road
Norwich
NR1 1RY

T 01603 619876
F 01603 665096

rochesurveyors.co.uk

Our Ref: SMK/KCB

Dear Philip

The Apex, Ipswich Road, Norwich

I refer to our recent telephone call and write to confirm where we are with regards to marketing the Apex, the general demand for employment sites in the locality and to give some background on the interest we have to date.

By way of context, the site is, as you know, located to the south of Norwich city centre, off Ipswich Road (A140). It sits in one of the most accessible locations for both the city and the A47. Other employment sites which are closer to the A47 or within similar distance, such as Broadland Business Park and Bowthorpe, are substantially further from the city centre and the main concentration of population. This is why White Lodge Industrial Estate has performed so well over time, with accessibility to both the city centre and the A47.

The benefit of the Apex is not only its geographical siting but the fact that new properties are to be constructed. Minimum energy efficiency regulations are now driving buildings to be more efficient and there are a number of corporate occupiers and institutional landlords who require premises with EPC ratings of A-C rather than traditional warehouse and industrial premises of E, F or G banding. Lower running costs and more energy efficiency will drive larger corporates to seek new premises. Accessibility to their key markets will also be important, thereby making central locations to both the major road network and the population areas important. The Apex benefits from its location considerably.

In looking at the present demand, there is interest from a number of businesses, and this is set out below:

- Builders' merchant – 2 acres for premises and yard.
- Steel manufacturing business – 1.5 acres for building and yard.
- Food distribution business – 5 acres for yard and premises.
- Gas maintenance and design business – 1 acre for premises and yard.
- General enquiry for 3,000 – 5,000 sq. ft. units (6 in total) - requiring 1 acre for yard and premises.

The above total approximately 10.5 acres.

PARTNERS

SML Kingston MRICS Ltd
AJ Allen FRICS Ltd
Mrs JA Crisp FRICS Ltd
AMA Fennell FRICS Ltd

ASSOCIATES

D Hall MRICS, Building Surveyor
G Jones MRICS

Regulated by RICS

When you consider that the development has not commenced on the business park, it is reasonable to assume that take-up of the space will occur within a short period of time due to the popularity of the location. The present site has a total area of 30 acres and allowing for roads and landscaping, there is a net developable area of approximately 17.8 acres with strong interest in 58% of the land already. Based on the interest there is, we would assume that by 2030 the land will be fully developed out. Other land within the marketplace is available but this is limited to:

- Broadland Business Park – There are a number of acres available here, but this is a less favourable location due to its distance from the city centre. The take-up has been limited over the past 2-3 years.
- Broadland Gate – The majority of this land is now under offer or sold.

Other land to the north of the city at Norwich Airport is not ready for development at the present time, nor is the land being promoted adjacent to the A140 and A1270.

There is, therefore, limited availability of land for occupiers to construct on, especially benefiting from strong geographical position and having the opportunity to construct modern units to present building regulations. We are of the opinion, therefore, that demand will outweigh availability of space at the Apex by 2030. With environmental issues forcing occupiers to consider their carbon footprint, new build properties offer sustainable and carbon neutral options. A second phase of the Apex would consist of similar uses, i.e. B1, B2 and B8 and as with the present interest, the occupiers will be a combination of SME's and corporate occupiers. The availability of both freehold and leasehold properties adds to the attraction of the site. A number of development sites are focused on either freehold or leasehold tenure, but not both.

Over the past 12 months, take-up of industrial property has been in the region of 280,00 sq. ft. and existing stock is in the region of 741,800 sq. ft., with demand standing at 591,500 sq. ft. The biggest single property is Carrow Works which is 179,787 sq. ft. and forms part of a development site and is only available on a short-term basis. Based on the available supply and the demand, the two are almost identical, when the Carrow Works site is removed.

Furthermore, the demand figure has increased over the last 2 years as businesses have struggled to locate fit for purpose property. Most of the existing stock is now dated and occupiers' expectations and requirements are substantially different to when the majority of property was constructed in the 1970's and 1980's. Changes to specification include: greater eaves height, forecourts suitable for loading and unloading, higher quality offices and clean modern space. New, well designed and specified accommodation, in the correct location will be well received by the market. The strong level of occupier demand has led to the first large scale speculative development to occur in Norwich for close to 20 years.

The Additional and suitable development land is therefore imperative.

Should you require anything further, please let me know.

Regards

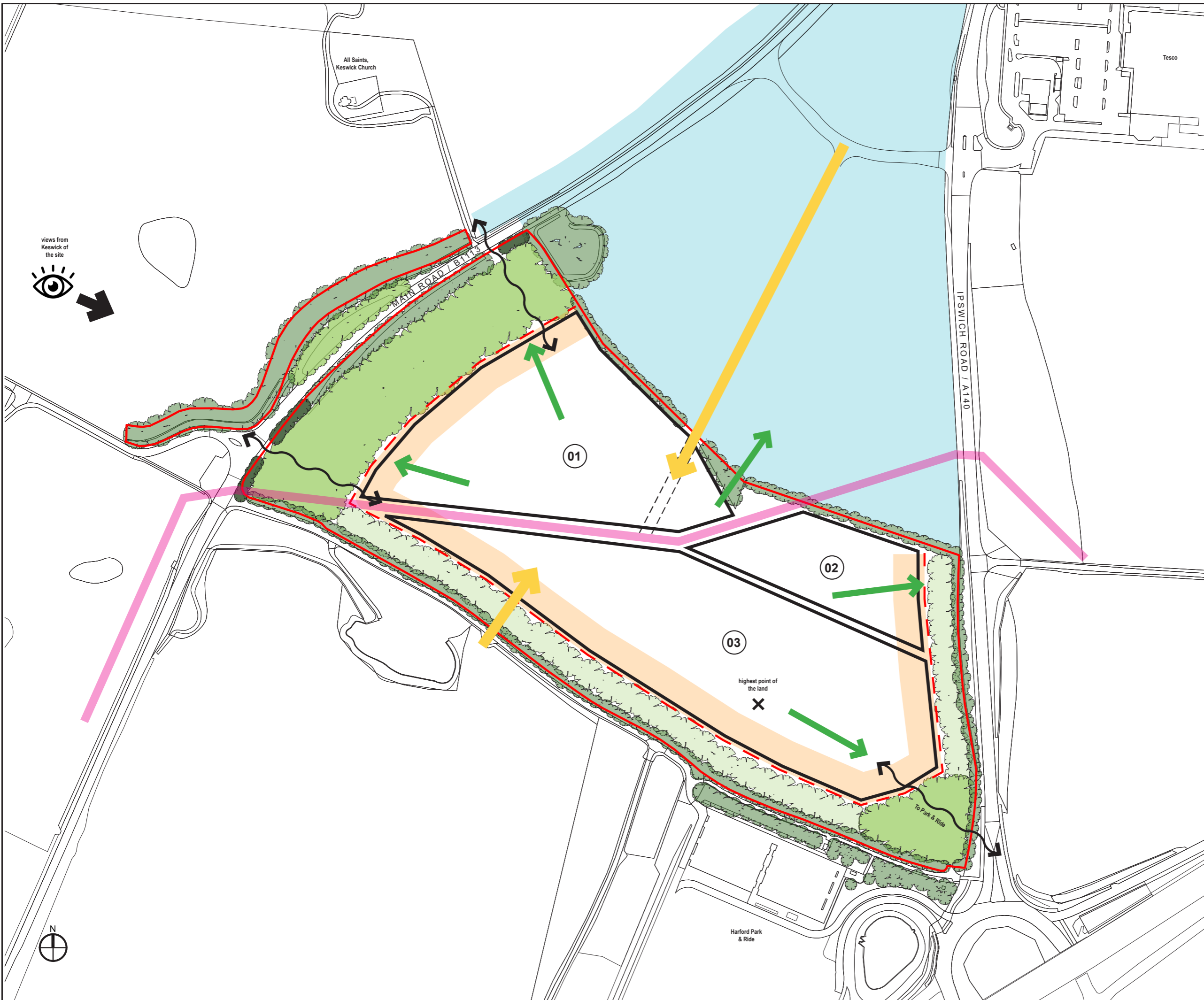
Yours sincerely

S Kingston BSc (Hons) MRICS

sam.kingston@rochesurveyors.co.uk

Direct Dial: 01603 756340

Appendix 3 – Site Constraints and Parameters Plan



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- Site boundary
- - - Developable area boundary
- Existing hedge and trees [retain and enhance]
- Enhance gaps within existing hedge and trees
- Additional buffer zone
- Woodland Planting
- ↪ Possible pedestrian access
- ↗ Slope of the land
- ↘ Proposed new access
- Apex Business Park [approved planning ref: 2017/2794]
- Possible building free zone [reduced built mass visible to boundary]
- Existing gas pipeline and associated no build zone
- 01 Development Zone 1 - 2 storey 10.5m maximum height
- 02 Development Zone 2 - 10m maximum height
- 03 Development Zone 3 - 9m maximum height

REVISED BY: - DATE: - CHECKED BY: - DATE: -

PURPOSE OF ISSUE IN - For Information	RIBA STAGE -
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DRAWING STATUS S0 - Initial Status
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PROJECT TITLE Harford Phase II

CLIENT Lanpro

DRAWING TITLE Site Constraints & Parameters Plan	SCALE NTS
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PROJECT NO	TYPE	UNIQUE NO	REVISION
2052A-	00	001	-

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Appendix 4 - Emerging Concept Masterplan



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Site boundary
Site area = 15.9 Ha

REVISED BY: -	DATE: -	CHECKED BY: -	DATE: -
PURPOSE OF ISSUE IN - For Information			RIBA STAGE -
DRAWING STATUS S0 - Initial Status			
PROJECT TITLE Harford Phase II			
CLIENT Lanpro			
DRAWING TITLE Sketch Layout Plan			SCALE NTS
DATE MAR 20	DRAWN BY TH	CHECKED BY DO	APPROVED BY DO
DRAWING NUMBER			
PROJECT NO 2052A-	TYPE SK	UNIQUE NO - 002	REVISION -



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Appendix 5 – Landscape Appraisal



View towards the Site taken from bridleway BR7

Harford Phase II

Landscape Appraisal to support submission for Stage C Regulation 18 Greater Norwich Local Plan Consultation
March 2020

1. Scope and context	3
1.1 Study scope	3
1.2 Description of Proposed Development	3
1.2 Site Location and Landscape context	3
2. Baseline landscape and visual conditions	4
2.1 Landscape character & sensitivity study review	4
2.2 Landscape value	6
2.3 Visual appraisal	7
3. Predicted landscape and visual effects	13
3.1 Predicted landscape effects	13
3.2 Predicted visual effects	13
4 Strategic guidance for mitigation	14
4.1 Mitigation and enhancement	14
4.2 Planting	14
4.3 Establishment timescales	14
5 Conclusion	14

Revision	Date	Prepared By	Reviewed By	Approved By
-	March 19	Maria Rapti	Daniel Orford	Ian Douglas

2.0

Baseline landscape and visual conditions

2.1 Landscape character and Sensitivity Study Review

As part of the desktop study the 'South Norfolk Local Landscape Designations Review Landscape Character Areas & River Valleys in the Norwich Policy Area' (Chris Blandford Associates September 2012) and 'Norwich Southern Bypass Landscape Protection Zone' (Chris Blandford Associates November 2012) were reviewed to gain an understanding of the local landscape character areas and the Norwich Southern Bypass Landscape protection zone and assess their sensitivity to change.

The site falls within the landscape character areas of Yare Tributary with Parkland (C1); Tas Tributary Farmland (B1); Yare Valley Urban Fringe (F1) and in close proximity but outside Tas Rural River Valley Extents (A1) which for this reason will not be included in the scope of this assessment. A brief summary of the key characteristics relevant to the area of study are listed below:

C1. Yare Tributary with Parkland

Key Characteristics:

Shelving landform with gently undulating topography created by the presence of small tributary stream valleys providing a variety of open/more intimate landscape settings and long/framed views:

- Landscape forming part of the transition between the rural and urban landscape.
- Peaceful farmland with small farm woodlands and intermittently wooded tributary valleys creating quiet rural atmosphere.
- Estate railings, boundary fences, tree-lined avenues and traditional wooded parkland contributes to landscape characters.
- Sparsely settled farmhouses, small villages and rural dwellings interspersed with large manorial buildings and halls.
- The Norwich Southern Bypass and A11 Wymondham Road trisects the landscape and the area is also traversed by the main Norwich-London railway line. These routes create corridors of movement and noise in this otherwise peaceful landscape.
- Arable and pastoral farmland. Fields surrounded by sparse hedges and hedgerow trees, with occasional mature/veteran oaks forming distinctive features alongside the lanes.
- Intermittent long views towards the city of Norwich.
- Presence of large institutional buildings, including the new hospital.

Sensitivities and Vulnerabilities:

- Loss of rural farmland character through expansion of urban edge of the city beyond the Yare Valley, development associated with the Southern Bypass/A11 or to the west of Cringleford.
- Loss of the clarity of the rural/urban divide created by the Yare Valley.
- A gently shelving topography from the plateau and long views making this area especially sensitive to the location of any new development / infrastructure and potential impact on the views to the City.

Development Considerations:

- Maintain the peaceful farmland landscape and a clear rural / urban transition.
- Consider impacts on key views from the higher plateau landscape, the adjoining character areas and views towards the city.
- Ensure that the rural character of the landscape of the Norwich Southern Bypass Protection Zone is maintained and that different development North and South of the road do not erode the unity of the Character Area.

B1. Tas Tributary Farmland

Key Characteristics:

- Open, gently undulating to flat and sloping landscape incised by shallow tributary valleys, the tributary streams of which are not prominent landscape features.
- Roman Pye Road (A140) is a significant historic feature, visible within the landscape and the reason for Long Station's location.
- Significant number of surviving greens, cohesive settlements of timber-framed buildings grouped around them, church/hall complexes and an extensive network of ancient trackways linking them together.
- Large, open arable fields.
- Framed open views across the countryside and into the adjacent character areas.
- Small blocks of deciduous woodland that create wooded horizons which add variety to, and create intimate landscapes.
- Scattered remnant hedgerow trees (particularly oaks), sometimes including intact avenues lining roads or field boundaries.
- Transportation corridors including main connecting roads and extensive network of narrow lanes and recreational footpaths.

Sensitivities and Vulnerabilities:

- Gentle sloping topography and open landscape make this area sensitive to intrusion by tall and large elements.
- Potential for adverse effects upon views in the north of this character area to/from Norwich and the Bypass.

Development Considerations:

- Maintain positive views towards the Tas Tributary Farmland from the Norwich Southern Bypass and to/from the city of Norwich.
- Consider the impact of any development upon the skyline and sense of openness of the character area.
- Maintain positive views to/from Venta Icenorum in the Tas Valley.
- Consider the impact of any development upon the nature of the current and desired physical relationship of Long Stratton Norwich, and upon Long Stratton's perceptual role as the geographical and administrative heart of South Norfolk.

F1. Yare Valley Urban Fringe

Key Characteristics:

- Broad semi-enclosed valley forms with wide, flat flood plains and enclosing valley sides, occasionally opening up to adjoining tributary river valleys, resulting in a sense of containment and unity.
- Large meandering river flanked by characteristic wetland vegetation including reeds, and fringing alder/willow woodland and grassland.
- Sense of inaccessibility with transportation routes restricted to discrete transverse river crossings and non-vehicular bridleways.
- Perceived absence of settlement within the valley, although influenced by developments in the city of Norwich.
- Sense of remoteness and solitude within the valley.
- Green Buffer comprehensible development edge to Norwich.
- Strongly influenced by modern transportation corridors, in particular the southern Norwich Bypass.

Sensitivities and Vulnerabilities:

- Loss of naturalistic quality as a result of further intrusion of suburban development, large institutional buildings and tall structures.
- Developments within the valley or adjoining character areas that would increase the perception of the level of development surrounding the valley, which would therefore weaken the current perception that the river Yare is unconnected to the major city.
- Further disturbance of the tranquillity of the area by traffic, in particular, the detrimental impact of cross-valley links or the upgrading of existing links.
- Sensitivity of recreational uses to losses in naturalistic quality.
- Developments that intrude upon the views into the landscape, including views from the Norwich Southern Bypass.

Development Considerations:

- Respect the relative absence of development within the valley and ensure any new development relates to existing settled crossing points.
- Maintain the distinction between settlements to the south and north of the Yare.
- Ensure new development does not intrude upon the openness within the valley or character of the vegetation.
- Maintain open views to and from the Southern Bypass, the city of Norwich and important landmarks.

Norwich Southern Bypass Landscape Protection Zone' (NSBLPZ)

Key Considerations:

Development within Norwich Southern Bypass Landscape Protection Zone should have regard to preserving and, where possible, enhancing the landscape setting of the southern bypass and the urban area, in particular:

- Long distance views and relatively undeveloped approaches to Norwich which contribute to the historic setting of the city.
- Historic urban/rural 'Gateways' on major routes to/from the city.

Undeveloped Approaches:

A140/Ipswich Road and the B1113 are part of the undeveloped approaches, where rural character is maintained until the city boundary at Harford bridge. The Norwich-Ipswich Railway line also maintains its rural character until the railway crosses the city boundary.

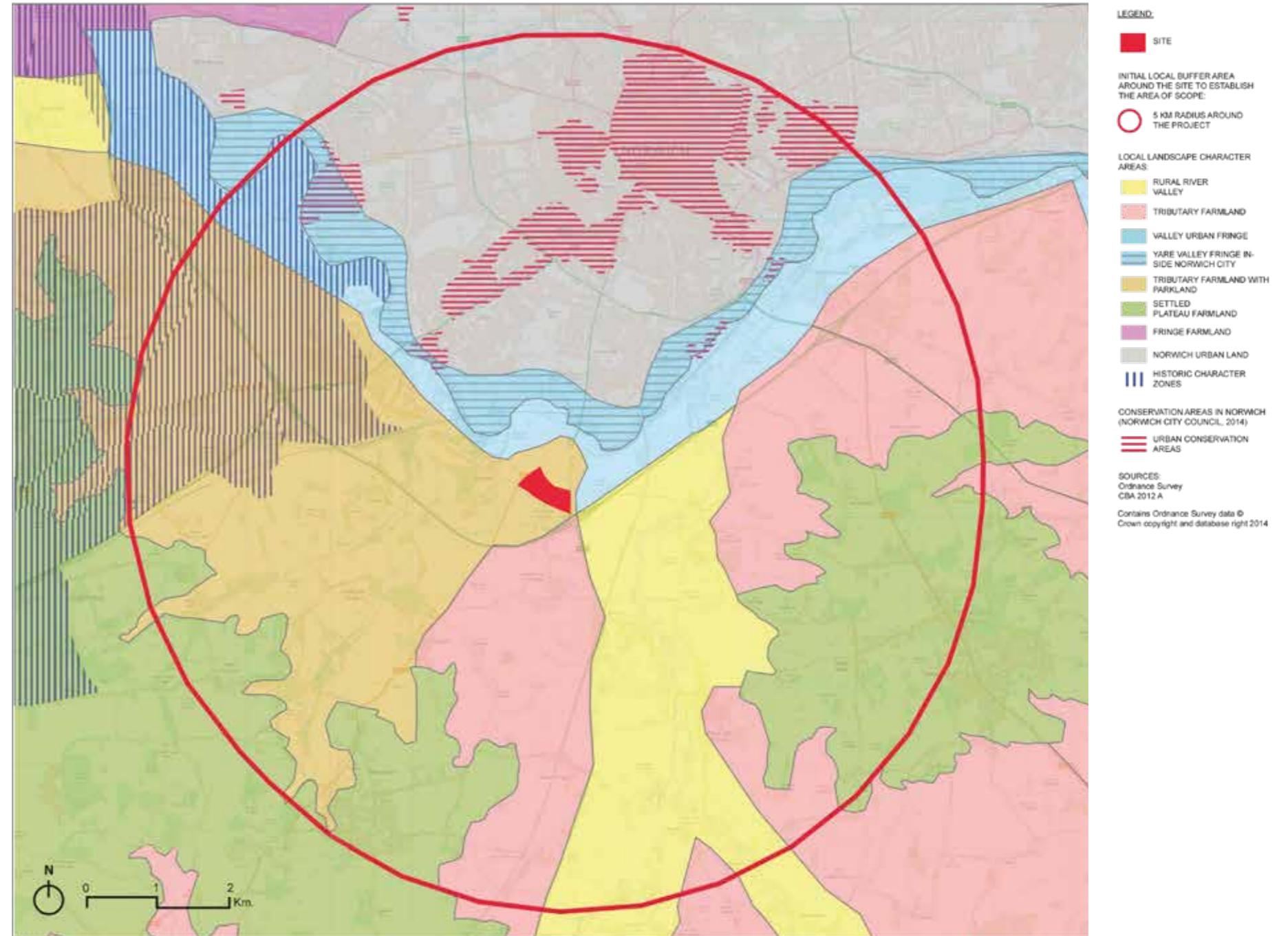


Figure 2 - Local Landscape Character

2.2 Landscape value

Landscape Designations

A number of Statutory Land-Based designation sites lay within relative proximity to the site. Caistor St Edmund (SSSI), Eaton Chalk Pit (SSSI), Shotesham Common (SSSI) and Sweetbriar Road Meadows Norwich (SSSI) fall within 5km radius from the site, while St James’s Pit (SSSI), Bramerton Pits (SSSI), River Wensum (SSSI), Lower Wood Aswell thorpe (SSSI), Shotesham-Woodton Hornbeam (SSSI) and Yare Broads & Marshes (SSSI, RAMSAR) fall within 10 km radius from the site.

The Intwood Hall Gardens situated 1.5km from site.

The above information was extracted from the *Multi Agency Geographic Information for the Countryside (MAGIC)* website managed by Natural England.

In terms of Local Landscape Designations, the site falls within the Norwich Southern Bypass Landscape protection zone, outside Viewing Cones/Zones from the Northern Plateau Edge and 816m from Urban Gateway into Norwich (*City of Norwich Local Plan August 2012, Draft Policy DM3*).

The Site falls within Fringe Action Area 13 highlighted within the *Greater Norwich Green Infrastructure Strategy (REF)* as providing opportunity at strategic level for Priority Habitat Enhancement and Creation areas, as well as for new Red Way (*GNGIS by Chris Blandford Associates, September 2007, Fig 5.2 p7 & Fig 6.2 p9*).

Listed Buildings

A number of Grade II and Grade II* listed building are present in the area, however the site is not visible from any of these locations. The All Saints’ Church and remains of the old church, both Grade II listed buildings, are located approximately 160m from the eastern boundary however as aforementioned the site is not visible from these historic buildings.(Figures 6 & 7 p. 13)

Scheduled Monuments

Scheduled Monument sites situated predominantly to the east, with the Anglo-Saxon Burial Ground and the Venta Icenorum Roman town within 1km radius. Further to the east the Medieval Villages of Bixley and Arminhall fall within a 5km radius.

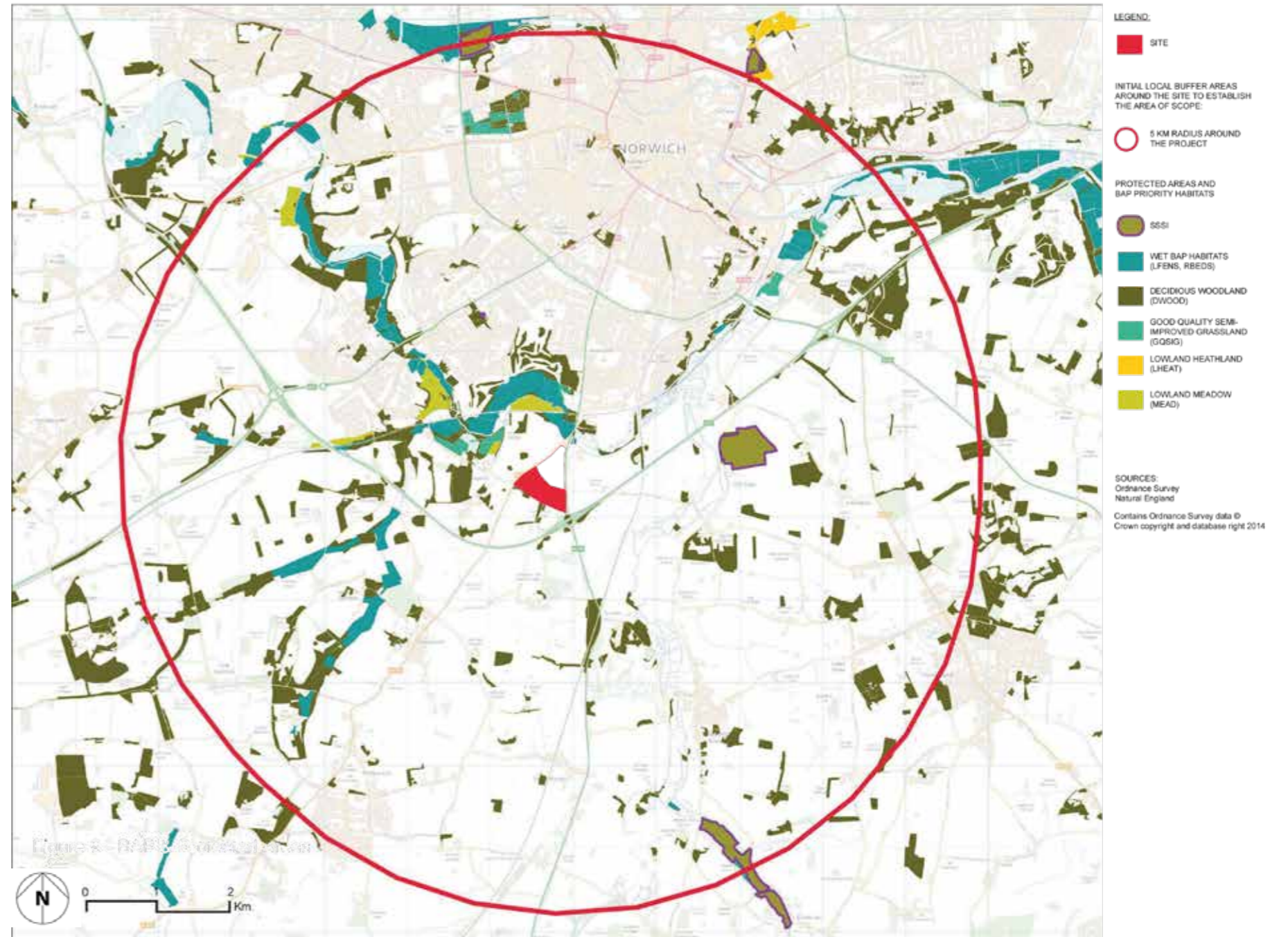


Figure 3 - Landscape Designations

2.3 Visual appraisal

Figure 4 shows the Zone of Theoretical Visibility (ZTV) for the Site, produced by means of digital mapping and modelling. The ZTV only considers the bare land form and does not take account of potential screening of built elements or vegetation. In this respect, the ZTV defines the geographical area where any visual effects are likely to be influential within the landscape.

The viewpoints reflected in Figure 5 have been selected as representative views from locations that are accessible to the public and reflect the viewpoints as agreed with the Local Planning Authorities for the adjacent site (Harford Phase I). Viewpoint photography and associated notes for viewpoints 1 to 15 can be found on pages 8-12.

On the day of the photographic survey weather conditions were mostly dry and mostly sunny in the morning, shady in the afternoon with increased density of clouds and occasional showers. Photographs were taken at a height of 1.5m above ground.

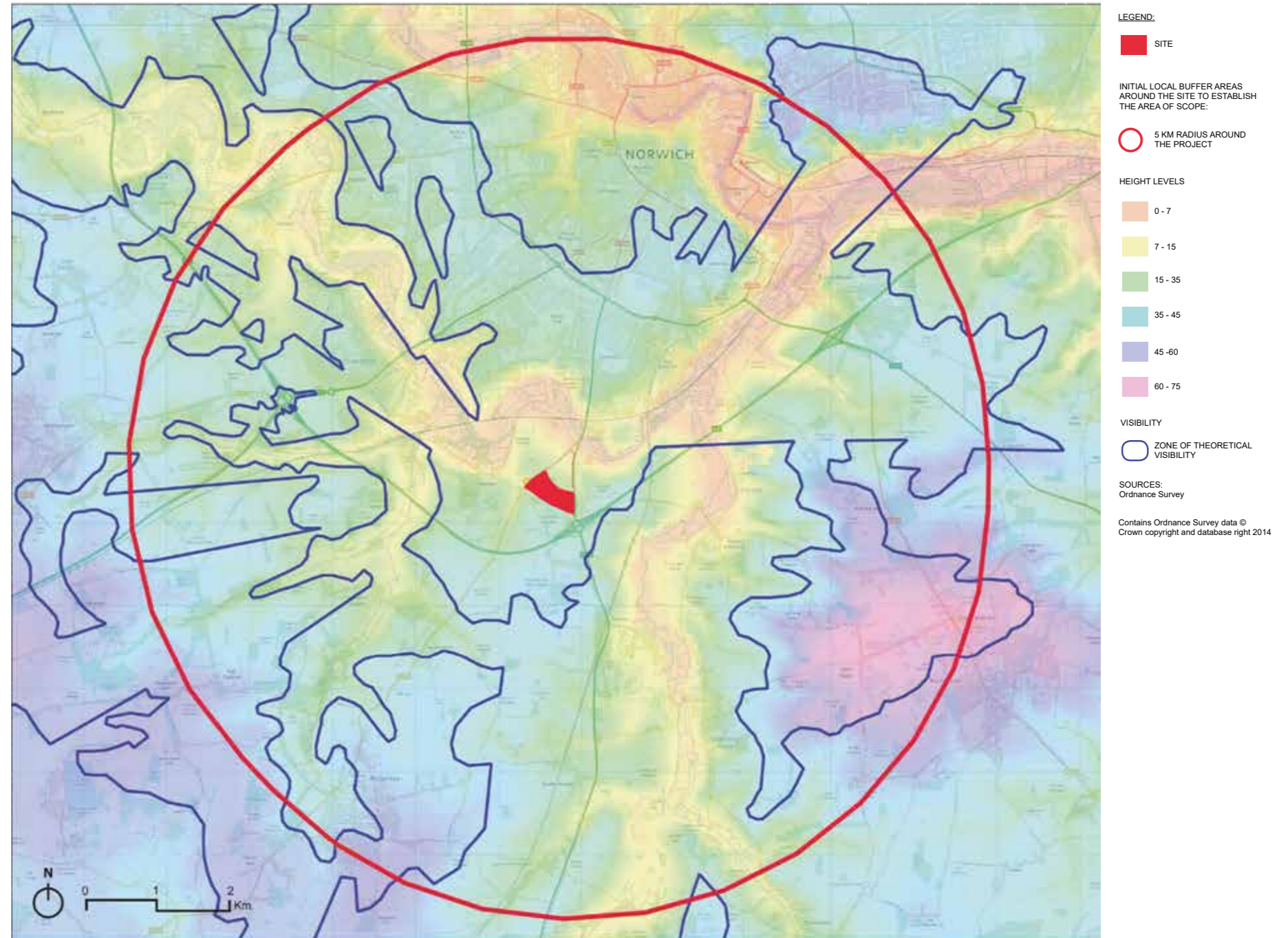


Figure 4 - Zone of Theoretical Visibility

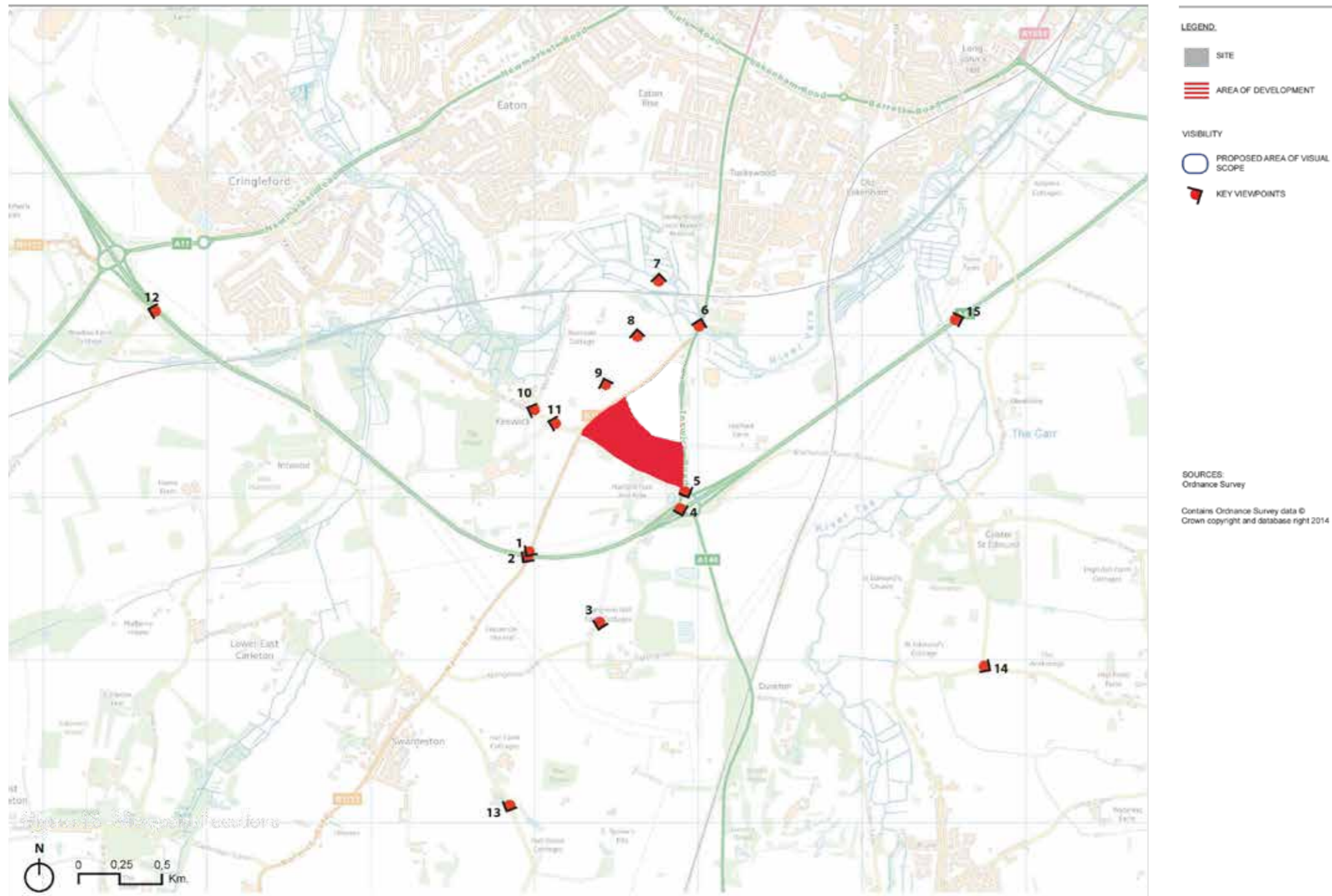
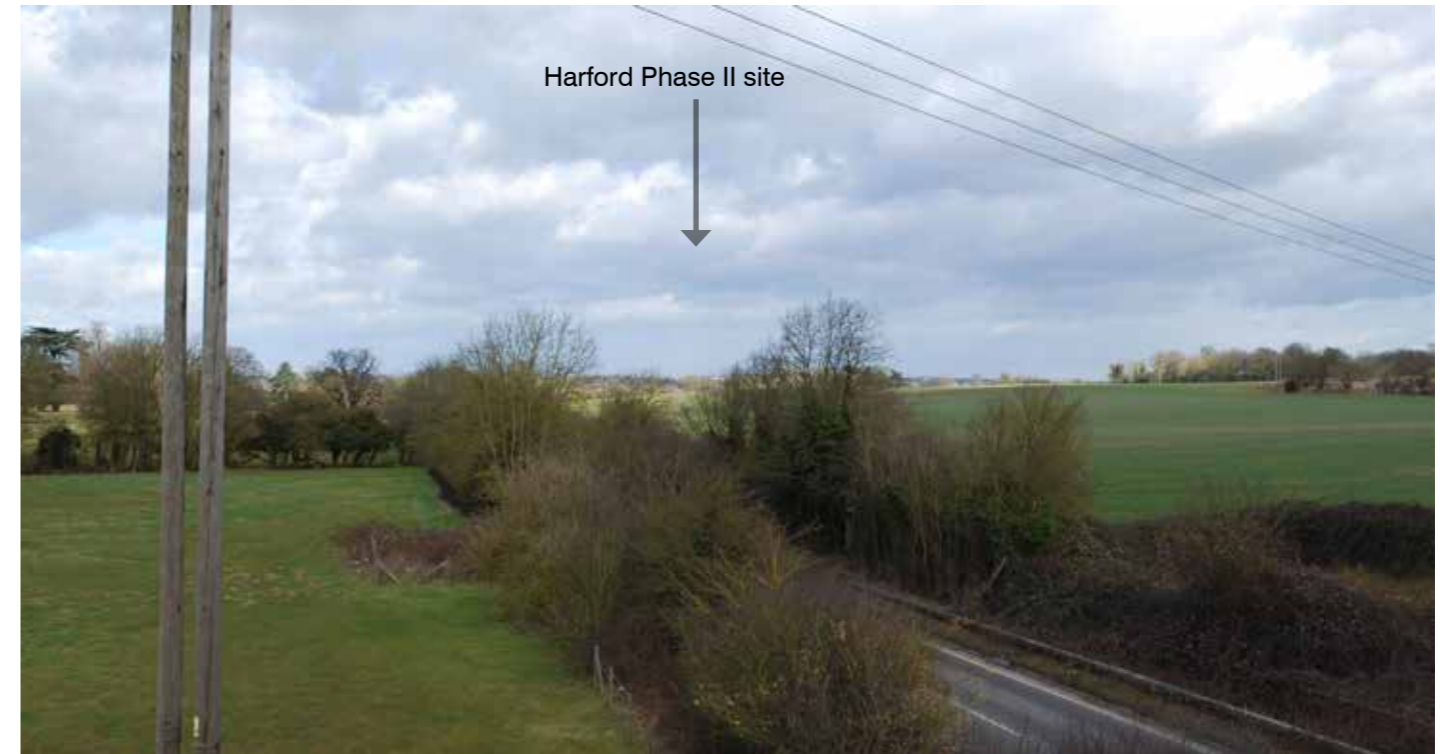


Figure 5 - Viewpoints as agreed for Harford Phase I submission and approval.



Viewpoint 1 - view taken from B1113 under bridge crossing with A47 looking north east towards the site at approximately 0.8km distance. Due to the rise of landform and dense planting, proposed development would not be visible from this viewpoint.



Viewpoint 2 - view taken from A47 over bridge crossing with B1113 looking north east towards the site at approximately 0.8km distance. Due to existing vegetation, roofline of new development would be partially visible from this viewpoint.



Viewpoint 3 - view taken from Mangreen Hall footpath looking north towards the site at approximately 1km distance. Proposed development would not be visible from this viewpoint.



Viewpoint 4 - view taken from A47 Norwich Southern Bypass, above the junction with A140, looking north west towards the Site at approximately 130m distance. From this viewpoint the full extent of the new development will be visible.



Viewpoint 5 - view taken from Harford Park & Ride at at Harford Interchange with A47 Norwich Southern Bypass and A140 looking north west towards the site. The viewpoint is at the south east site boundary, 0km from the site. From this viewpoint the full extent of the new development will be visible.



Viewpoint 6 - view taken from Harford Bridge looking south towards the Site at approximately 0.8km distance. Due to dense existing vegetation and built form the new development will not be visible from this location.



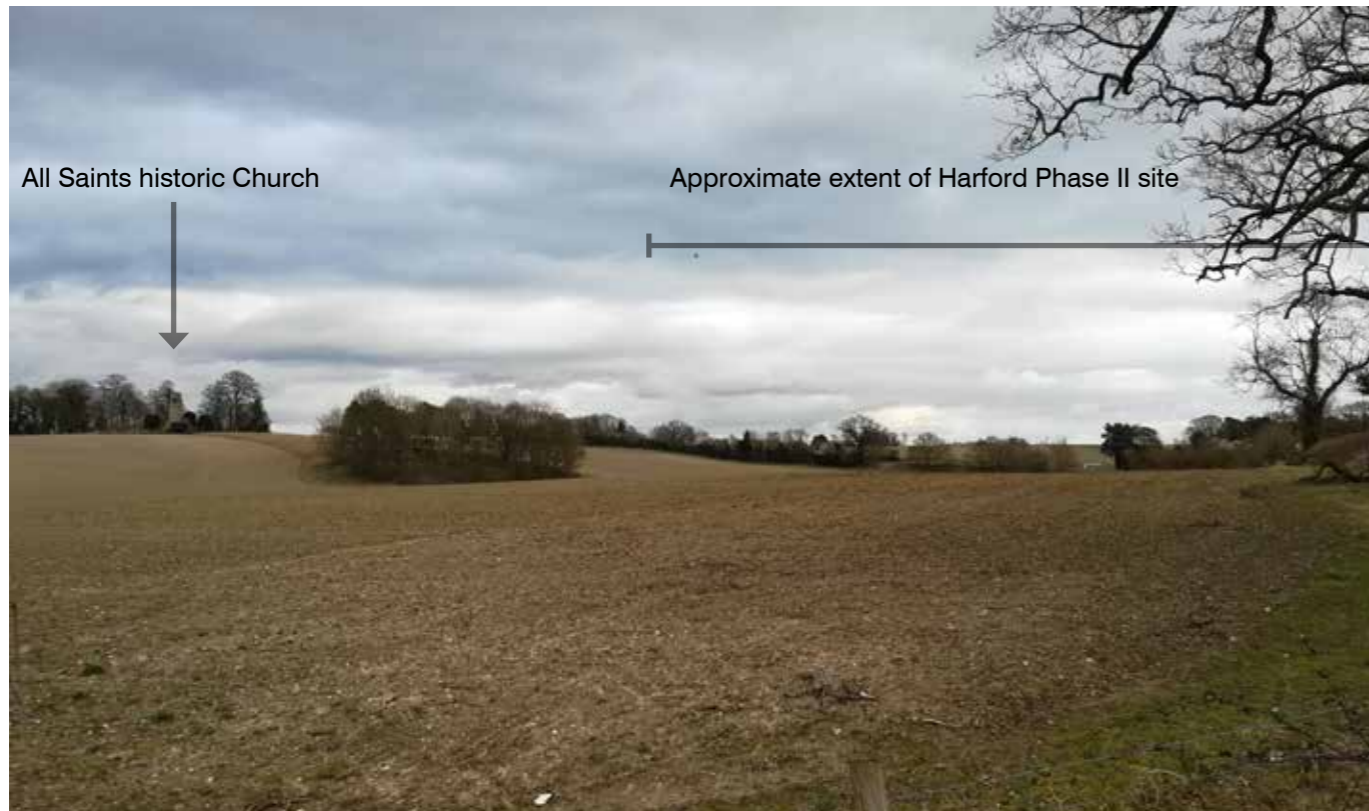
Viewpoint 7 - view taken from the Marston Marsh Nature Reserve, from the northern side of the River Yare looking south towards the site at approximately 0.5km distance. The topography rises into the distance of this view and the site can be seen beyond the B1113 road. It is expected that the development will be concealed behind Phase I development.



Viewpoint 8 - view taken from bridleway BR7 looking south-east towards the site at approximately 400m in the distance. Hedgerow in the foreground running along the bridleway would provide some screening to the development although gaps in the hedgerow planting occur, one of these is visible in this viewpoint photograph.



Viewpoint 9 - view taken adjacent to All Saints Church from the track that leads between the B1113 and the Church, looking south-east towards the site. The viewpoint is approximately 160m from the site. The view is partially disrupted by vegetation.



Viewpoint 10 - view taken from Low Road crossing with Mill Lane looking north east towards the site at approximately 350m distance. The topography rises up into the distance of this view. All Saints Church can be seen to the left of this view. The site is visible from this view, through existing scrub and tree vegetation.



Viewpoint 11 - view taken from the junction with Keswick Hall Road and Low Road, looking east towards the Site at approximately 200m distance. The site is visible from this view, through existing scrub and tree vegetation.



Viewpoint 12 - view taken pedestrian footbridge which cross the A47 Southern Bypass to connect Cringleford with Cantley. The view looks above the A47/A11 junction to the east towards the site at approximately 1.6km distance. The lower part of the view is dominated by the dual carriageway and thick vegetation blocking the views to the site.



Viewpoint 13 - view taken from Gowthorpe Lane, at the point where footpath FP10 meets the road, looking northeast towards the site. In the foreground an established hedgerow which adjoins the road is in view, beyond this mature trees and woodland surrounding adjacent fields can be seen. The site can not be seen from this viewpoint or from close by areas.



Viewpoint 14 - view taken from the point where Chandler Road transitions to Boudicca Way looking north west towards the site at approximately 3.2km distance. The topography rises to form a ridge on the horizon before sloping away from view towards the site. The proposed development would be largely visible from this viewpoint.



Viewpoint 15 - view taken from the Southern Bypass westbound carriageway where the road crosses over the River Tas. The viewpoint looks south-west towards the site, at approximately 2km distance. The view looks over the A47 and onto fields beyond. Chapel Hill can be seen (the mounded area with woodland) which obscures any possible view of the site. Scrub and trees are visible in the foreground and more distant view, electricity wires from nearby pylons dominate the sky in this view.

3.0

Predicted landscape and visual effects

This report does not provide a full Landscape and Visual Impact Appraisal, but aims to indicate the probable landscape and visual effects that may result from the development of the site.

At this stage, the assessment considers the potential landscape and visual impacts that could be expected to occur if the site were to be developed without any mitigation measures. However as part of this appraisal and contained within Section 4, consideration has been given to mitigation measures to reduce any potential impacts from the specified viewpoints.

3.1 Potential landscape effects

With reference to the information provided by the resolvent landscape character assessments for the area in section 2.1, the components of the landscape that are likely to be affected by the development proposals for the site are:

- The openness of the site and surrounding areas, by a reduction in the views across the site. These changes are expected to affect Landscape Character Areas C1 and F1.
- The farmland character of area C1, as well as the naturalistic character or area F1.
- Changes of land use of the site and effects deriving from this change on the soil, landform and drainage of the site.
- Negligible loss of existing vegetation on the boundary of the site.

3.2 Potential unmoderated visual effects

Visual Receptors:

The term 'receptor' is used in landscape and visual impact assessments to mean 'an element or assemblage of elements that will be directly or indirectly affected by the proposal. Visual receptors include the public or community at large, residents, visitors, and other groups of viewers as well as the visual amenity of people affected.' On this site the visual receptors will primarily be:

- Walkers and ramblers
- Residents
- Road Users including the Park & Ride users
- Visitors to heritage assets and monuments

Analysis of the selected representative views suggest that without mitigation the principle effects on visual receptors are likely to be:

- The visual impact from viewpoints 1, 2, 3, 6, 12, 13 & 14 are negligible in both magnitude of the effect and sensitivity of the receptor.
- Impact caused by the development proposal occurs mostly to the close proximity views. In particular, the impact to viewpoints 4 & 5 will be high and have an adverse impact through the loss of openness of the landscape and rural character; however, the sensitivity of these viewpoint receptors is minor to moderate.

- Despite the high sensitivity of receptors, the visual impact on viewpoint 7 at the time of Phase II of the development are not expected to be severe, as the magnitude of change will occur at Phase I.
- The predicted effects on viewpoints 8 & 9 can be considered important, this is due to the sensitivity of receptors to visual change and the associated magnitude. It is worth mentioning though, that viewpoint 8 is located on the path leading to the All Saints Church, however the proposed development will not be visible from the church and churchyard itself (highly sensitive receptor). (Figures 6 & 7)
- The predicted effects on viewpoints 10 & 11 can be considered moderate, due to the distance of the development and the partial screening. The sensitivity of receptors of both views is considered high.



Figure 6. All Saint Church.



Figure 7. View towards the site taken from All Saint Churchyard.

4.0 Strategic guidance for mitigation

4.1 Mitigation & Enhancement

The landscape mitigation has focused on creating a dense buffer zone of indigenous tree & shrub planting around the site boundary of 5m minimum width where possible, that will screen the development and enhance the biodiversity of the area.

The existing hedgerows will be retained and enhanced with new native species rich and wildlife beneficial planting at places where the density of the existing hedgerows have started to decline. The hedgerows will be a minimum of 2m high and will form the outer boundary of the buffer zone. Trees 16-18cm girth will be included in the hedgerows where possible to achieve instant screening.

In order to mitigate the sensitive views from the west, a wider zone of woodland planting is proposed, including further tree planting to enhance existing screening. An understorey layer of native & wildlife beneficial shrub planting will contribute to the environmental qualities of this zone. As part of any development of the site it is the intention to extend the visual buffer to the west, by enhancing the existing planting zone off-site, west of B1113; this land is within the same ownership as the main site.

The selection of native plant species for the landscape aims to provide a habitat rich environment through nectar, pollen and fruiting shrub cover with hedgerow and canopy habitat to provide shelter resources throughout the year.

4.2 Planting

The tree planting of the perimeter, as well as within the boundary buffer zone consists of native tree species that soften the edge of the site and break up the building mass & rooflines. Trees will be selected for their contribution to the ecosystem, as well as their aesthetic value, size, form & colour. To the core of the development, structural tree planting offer place setting with 'green avenues' set against proposed buildings, enhancing the visual amenity.

The hedges are of strategic accomplishing screening & buffer and at the same time retaining the characteristic hedgerow pattern of rural England. The shrubs & perennials will decorate the elevations of the buildings, define the edges of the paths and ornament the amenity areas with colourful flowers and leaves, adding to their environmental value.

4.3 Establishment Time Scale

Tree Planting

It is suggested the tree planting along the buffer zone should be specified as extra heavy standard trees with a girth of 16-18cm and light standard with a girth size of 6-8cm and a height of 2.4 - 2.75m. Within 10 years of establishment these will have reached a height of 6m and 8m.

Within 25 years of establishment, trees are expected to have more or less achieved their full size. Size will vary from species to species, however large trees are expected

to have accomplished a height of 15m, which will exceed the maximum heights of any buildings on the site.

Indigenous Hedge Planting:

It is suggested that all indigenous hedge plants are planted as 1-1.2m bare root transplants. These hedges are to be maintained at 2m height.

Buffer Zone Shrub Planting

The buffer zone shrubs are suggested to be planted at 0.6-0.9m bare root transplants. The growing rate and maximum heights vary by species, however, medium to large shrubs are expected to have reached a maximum height of 3m within 10 years of establishment. However, some of the species are expected to reach up to 10m of height in full growth.

Plant Establishment	Planted Height	5 year Height	10 year Height	25 year Height
Extra Heavy Standard Trees	3-4m	6-6.5m	7-8m	up to 15m as per species
Light Standard Trees	2.4 - 2.75m	3.5-4m	4.5-6m	up to 15m as per species
Indigenous Hedge	1-1.2m	2m	2m	TB retained at 2m
Buffer Zone Shrubs	0.6-0.9m	1-2m	2-3m	6-8m

Figure 8. Plant Establishment Table

5.0 Conclusion

5.0 Conclusion

The predicted visual effects that may result from the change of land use due to the development of the site, have been thoroughly assessed in section 3.1. The change will produce an effect to the openness of the site surrounding areas, the farmland character of the site and its immediate surroundings, as well as the naturalistic character of area F1. However, as the development site is situated adjacent previous development of Phase I, the subsequent change effected by Phase II is expected to be insignificant.

In regards to visual effects, as thoroughly assessed in section 3.2, the impact to most distant views has been found negligible. Important to moderate effects have been identified to some of the close proximity views, however these are expected to be effectively mitigated and even reverted in some cases, with the introduction of a buffer zone rich with native species and woodland planting, enhancing the environment and improving visual amenity.

Overall, the development can be considered acceptable in terms of landscape and visual effects.

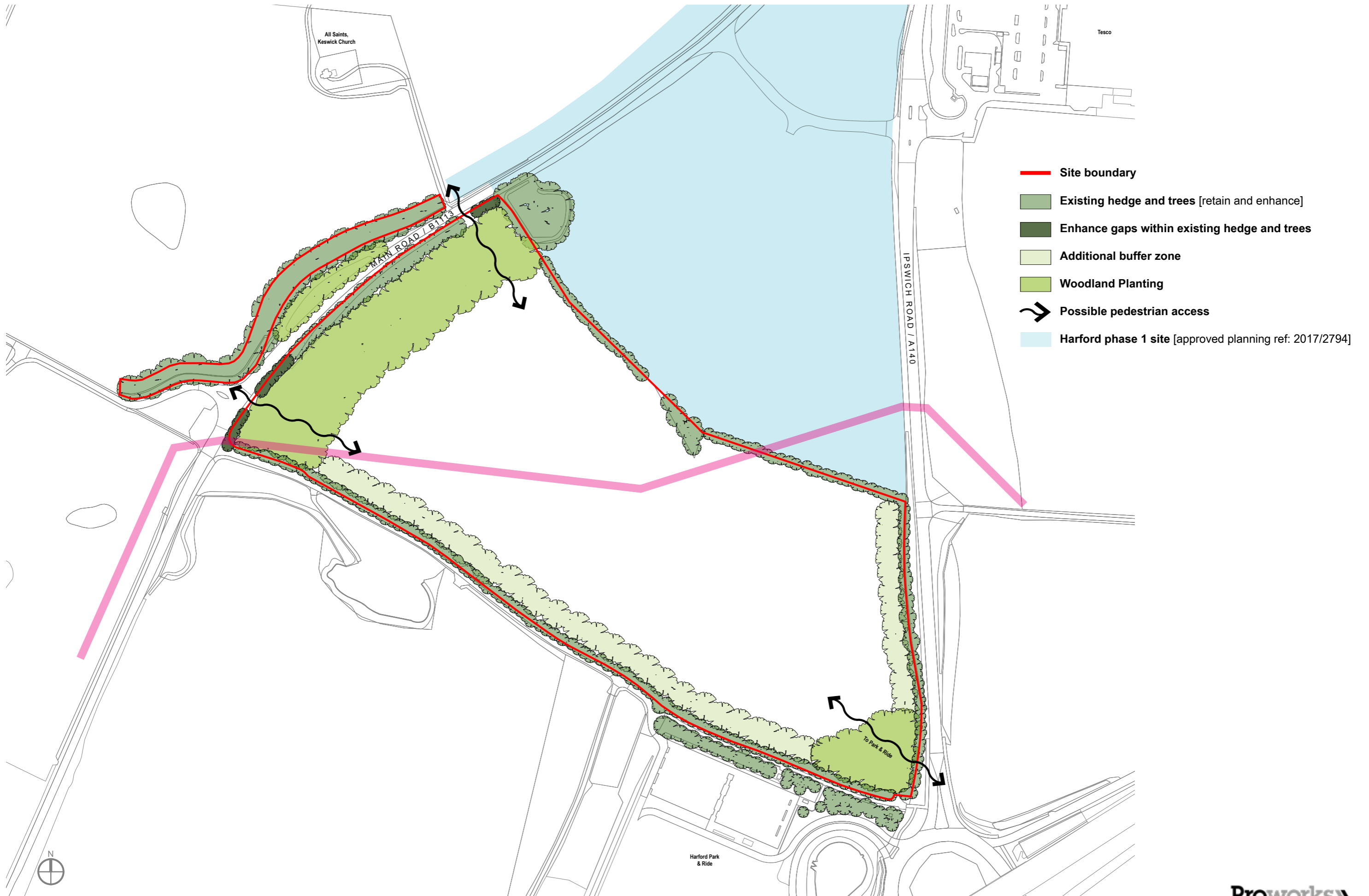


Figure 9. Landscape Mitigation Plan