



Greater Norwich Local Plan Regulation 18 Draft Local Plan

Consultation Response for Land north of the A47, north and east of Witton Hall and west of Dawlings Wood, Postwick.

Site ref GNLP0571

March 2020

Background

This site is located north of the A47 at the Brundall roundabout and covers 65.48 hectares. It was previously put forward through the GNLP call for sites process in 2016 as a potential new village.

The site has not been chosen as a draft allocation within the Greater Norwich Local Plan. The site assessment states:

“Constraints exist in respect to issues of access, impact on the road network, landscape, townscape, ecological designations, and heritage assets. The submitted information gives no indication that the necessary infrastructure and mitigations can be overcome. On this basis the site is not considered to be suitable for allocation. GNLP0571 is also out of step with the strategic proposals in the plan.”

These representations better explain how the proposals, although outwith the strategic proposals in the plan, do form part of a regional transportation improvement opportunity, and as such should be considered as an exceptional case in the light of these potential improvements. We have highlighted those policies in the plan which refer to transportation improvements, and we believe that in this context, the allocation of this site to facilitate these improvements, would be in accordance with the plan.

These Representations

Currently, both the Brundall roundabout, which sits immediately to the south of the site, and the Postwick Junction, to the west of the site, have traffic capacity issues. Brundall roundabout will only experience a worsening situation, once housing developments currently planned or being constructed are completed, increasing the traffic loadings onto the roundabout. Postwick Junction will experience a worsening situation as Broadland Gateway business park further develops, the western link completion, and housing allocations in the North East Triangle come online.

The site at Witton Farm presents an opportunity to resolve both of these traffic loading problems, with transport infrastructure improvements being delivered on the back of development within the Witton Farm site in the first instance, and on future sites at later dates.

Our drawing number 2018/001 in Appendix A shows diagrammatically how one option for this could be progressed.

Our proposal would be for a first phase new Brundall roundabout, replacing and relieving the existing roundabout, together with a first phase of new link road within Witton Farm, and the design of a strategic corridor through to Broadland Northway involving third party landowners.

The second and future phases would involve future allocations on third party land to allow the delivery and completion of the new link road, again on the back of future new development.

We would envisage a timeline which delivered the phase one new roundabout at an early stage to release capacity for the new developments in Brundall, and the future phases at a later stage, but concordant with the timelines for the completions of the new developments in the North East Triangle, and the completion of the western link road, which is when the capacity issues at Postwick Junction will need to be addressed.

The Greater Norwich Local Plan

The Local plan has clear transportation improvement objectives, and we believe that our site assists in meeting these objectives, but development is required in order to viably deliver the objectives.

The Vision for Greater Norwich set out in the draft plan at paragraph 122 states:

*“By 2038 our transport system will have been enhanced by a combination of infrastructure improvements and new technologies. Connectivity will improve both within Greater Norwich and to other parts of the country and beyond. This will include better rail services to London, Cambridge, Stansted, Milton Keynes, Oxford and the West, growth at Norwich International Airport, **as well as road improvements to the A47, the Norwich Western Link and the A140.**”*

We believe that our proposals will form a key part of these road improvements to the A47 in accordance with the plan.

Paragraph 134, summarising the plans objectives states

“Infrastructure

To promote the timely delivery of infrastructure to support existing communities, growth and modal shift in transport use; and to improve connectivity to allow access to economic and social opportunities.”

We believe that our proposals will be a crucial part in the improved connectivity to allow access to economic and social opportunities.

Policy 1 – The Sustainable Growth Strategy identifies a settlement hierarchy, within which growth should be distributed, and we note that number 3, Key Service Centres includes Brundall. We therefore think that Witton Farm does comply as a potential development site at a Key Service Centre, in compliance with the plan. Whilst we note that this consultation paper does not allocate any new housing within Brundall, we propose that this should be changed to include an allocation on Witton Farm, as an exceptional site, to deliver the regional transportation infrastructure improvements as previously described.

Furthermore, page 55 of the Sustainable Growth Strategy states

“Infrastructure

*New development must be supported by **additional infrastructure** of all kinds. Policies 1 and 4, along with appendix 1, set out the infrastructure requirements to serve the growth in Greater Norwich based on evidence in the Greater Norwich Local Plan Infrastructure Needs Report. This provides flexibility to allow for any changing needs over time, and no alternative approach is identified.”*

We believe that our proposals are in accordance with these policies.

With respect to the Consultation questions for Policy 1 we would respond as follows.

13. Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?

Answer: We agree with the proposed Settlement Hierarchy, but we disagree with the proposed distribution of housing within the hierarchy. We believe that Witton Farm should be included in the allocations to allow for the delivery of the transport infrastructure improvements.

17. Do you support, object or wish to comment on the approach to Infrastructure?

Answer: We support the approach to infrastructure, and believe that our proposals will positively contribute to this policy.

Policy 4 – Strategic infrastructure states:

194. The National Planning Policy Framework states that strategic policies should make provision for infrastructure for transport, water, energy, health, education and green infrastructure. This plan is supported by evidence in the Greater Norwich Local Plan Infrastructure Report (GNLPIR)⁷⁵.

195. As set out in the vision and objectives and the Delivery Statement, delivery of new infrastructure is a priority for the plan. It provides benefits for new and existing communities and is essential to ensure growth is sustainable.

196. This policy focusses primarily on the timely delivery of strategic infrastructure to support growth. The infrastructure will be provided by a range of organisations and through

a variety of funding sources as detailed in appendix 1. The appendix sets out infrastructure currently identified to support growth from organisations such as utilities companies and health care providers. Since these may be subject to change over time, the Greater Norwich Infrastructure Plan, which supports implementation of the GNLP, will update the information in appendix 1 of this plan annually to take account of any changes.

198. *To promote good local access to facilities, the policy also sets a requirement for development to provide or support local infrastructure, services and facilities. This can be directly through providing land, or indirectly through financial contributions which can include providing good access to existing services and facilities.*
200. *A well-functioning transport system and access to jobs, services and information is vital to the economy of the area and the well-being and quality of life for residents. Making the most of existing transport infrastructure and providing the additional infrastructure required to support growth will help support delivery of the GNLP. To support emissions reductions, it is also important to promote modal shift to active travel and clean public transport, and to support electric vehicle use in a time of rapid technological change.*
201. *Section 9 of the NPPF covers transport issues. It states that transport should be considered from the earliest stages of plan making, to address the potential impacts of development, take advantage of existing and proposed infrastructure and new technology and promote public transport, walking and cycling. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. It also recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.*
202. *National, regional and local (county) proposals for transport measures include consideration of the growth needs identified by local plans, integrating development with transport infrastructure needs. Government plans for major roads and there are regional strategies for railways. County led strategies provide for locally significant transport infrastructure. The recognition of and support for transport improvements in the GNLP can be of considerable assistance in applying for funding. The policy consequently identifies and supports strategic and local transport improvements.*
213. *Strategic transport improvements in policy 4 include rail and airport improvements, along with road improvements including dualling of the A47, the Long Stratton by-pass and the Norwich Western Link Road.*
214. *The transport element of the policy will evolve as the work to develop TfN strategy, LTP 4, Transforming Cities programme and Network Improvement strategies continues. This will allow both the policy and the GNLP implementation plan to be more specific and identify any relevant wider transport targets and measures to be captured beyond those required to support growth in the GNLP.*

We believe that our proposals to improve the regional transport infrastructure are in accordance with all the above policies.

With respect to the Consultation questions for Policy 4 we would respond as follows.

23. Do you support, object or have any comments relating to approach to transport?

Answer: We support the approach to transport and believe that our development proposal will help to deliver the strategic transport infrastructure improvements previously described.

Supplementary comments.

Our commentary above has addressed the policy issues in respect of the reasons for not allocating the site, and we have clearly shown that the transport infrastructure benefits of our site, which requires development to facilitate delivery, does comply with the transportation policies within the plan.

Other points were raised and we list these and comment on them as below.

- Access constraints; the proposed new roundabout would be designed to allow a good access into the site.
- Impact on the road network; our proposals would have a positive impact on the road network, improving access to Brundall, and relieving Postwick Junction.
- Landscape: Any new development would be landscape led, and would be subject to a Landscape Visual Impact Assessment to inform our landscape strategy and detailed design, all in accordance with best practice, and assessed using the usual criteria subjected to proposals during the planning consent process.
- Townscape: All urban design solutions would be in accordance with current published best practice guidelines, eg the Garden Village guidelines published by TCPI, Living with Beauty published by The Building Better, Building Beautiful Commission etc. Placemaking would be at the heart of all new development, and as above would be subject to the usual scrutiny of proposals during the planning consent process.
- Ecological Designations: All ecology would be subject to Phase 1 and Phase 2 studies, and designs would incorporate and mitigate in accordance with the recommendations of those specialist reports.
- Heritage Assets: Again, all Heritage Assets would be subject to specialist reports, with the recommendations being adopted into completed designs.

Summary

The above shows that our proposals do accord with the plan in respect of necessary transportation infrastructure improvements, and we believe that this site, being strategically best placed to unlock these improvements, should be treated as an exceptional development site for allocation, in order to allow development to fund these improvements.

I trust that the above and enclosed is of assistance to you and your colleagues in concluding the suitability and deliverability of the proposed allocation site. We would welcome the opportunity to discuss these proposals with you further.



APPENDIX A – STRATEGIC PLAN – DRAWING 2018/001

Legend

 Witton Farm Site Boundary
65.48 ha

 New roads

 New roundabout

