



CODE Development
Planners



**Position Statement
(Update)
(GNLP Regulation 18
Stage C)**

**Land west & east of
Reepham Road,
Norwich, (Sites
GNLP0332R and
GNLP0334R)**

**Submitted on behalf of
Drayton Farms
Limited and R G Carter
Farms Limited**

16 March 2020



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Drayton Farms/RG Carter Farms Ltd
Reepham Road
13 March 2020



EXECUTIVE SUMMARY

These representations are submitted on behalf of the landowners, Drayton Farms Limited and RG Carter Farms Limited in their promotion of two residential led development sites located in the parish of Horsford and directly adjacent to the northern edge of Norwich at Hellesdon (GNLP0332R and GNLP 0334R).

We submit that the Regulation 18 plan is supported by inadequate and inconsistent assessments of the landowner's sites.

The representations compare the approach and conclusions in respect of the assessment of GNLP0332R and GNLP0334R to that employed with the preferred allocation site at Taverham (GNLP0337) and with the Reasonable Alternative sites at Costessey (GNLP0581 and GNLP2043).

In our view, the Partnership's approach and details of assessments fail to meet the requirements of the NPPF (paragraph 35) and PPG (paragraph 038). Given the large proportion of total new allocations being concentrated on a single site at Taverham and the very real prospect of Reasonable Alternative sites being required in the plan period due to likely low delivery of allocated housing sites the approach to assessments is likely to render the plan as a whole not **justified** and not **effective**.

These representations include compelling evidence prepared on behalf of the landowners. The evidence rebuts the unsubstantiated statements/observations which appear to have led to the Partnership's conclusions.

1 INTRODUCTION

- 1.1 These representations are submitted on behalf of the landowners, Drayton Farms Limited and RG Carter Farms Limited in their promotion of two residential led development sites located in the parish of Horsford and directly adjacent to the northern edge of Norwich at Hellesdon (GNLP0332R and GNLP 0334R). These representations follow representations made to earlier stages of the local Plan process and include the submission of responses and Position Statement in March 2018 to the then Regulation 18 consultation. The Position Statement (PS) is re-submitted in these representations for reasons of consistency and clarity. The PS is a reminder of the evolution of the proposals and the emergence of evidence which has, and continues to justify and inform the suitability of the sites for development in a form able to deliver the strongest possible contribution to meeting the housing needs of the Greater Norwich area aligned with the preferred and sustainable strategies and objectives for the Local Plan area.
- 1.2 The following Statement sets out the landowner's response to what we consider to be an inadequate assessment of the suitability of the sites for development and the conclusion that the sites are 'unreasonable' for development. We do not believe that the sites have been robustly assessed or indeed assessed on the same basis as other sites. The conclusions of the draft plan to allocate certain sites and not the proposed sites 0332R and 0334R have not been **justified** as required by the NPPF. As a consequence, we believe there is a significant danger that the Plan will be considered to be not sound. In addition, in the case of some of the Reasonable Alternative sites identified in the draft plan there is less than convincing evidence to confirm that these sites are justified or deliverable within the plan period. As such the Partnership's strategy is likely to be not **effective**, placing further doubt on the plan as a whole being sound.
- 1.3 These representations are accompanied by the following evidence documents:
- Landscape and Visual Appraisal prepared by Robert Myers Associates (March 2020)
 - Landscape Report (incorporating Illustrative development framework plan) prepared by Robert Myers Associates (March 2020)
 - Heritage Desk Based Assessment prepared by Orion (May 2019)
 - Tree Survey and Constraints Plan prepared by Hayden's (February 2020)
 - Preliminary Ecological Appraisal prepared by Wild Frontier Ecology (June 2019)
 - Bird Hazard Risk Assessment prepared by Airfield Wildlife Management Ltd (July 2019)
 - The Monitoring and Management of Gulls on Commercial and Industrial Buildings in the Vicinity of Norwich International Airport prepared by Airfield Wildlife Management Ltd (July 2019)
 - Surface Water Drainage Strategy prepared by Richard Jackson Engineering Consultants (March 2020)
 - Access and Transportation Strategy prepared by Richard Jackson Engineering Consultants (March 2020)



- 1.4 The above documents represent the landowner's robust assessment of the suitability of the sites for development. They concentrate on the key issues relevant to site development in this location and provide evidence that the Partnership's assessments of these key issues do not reasonably justify the conclusions. Where appropriate, this statement refers to the Partnership's comparative assessments of sites identified as 'Preferred Site' at Taverham (GNLP0337) and 'Reasonable Alternative sites' at Costessey (GNLP0581 and GNLP2043). The Reasonable Alternative sites are identified as contingencies should they prove to be required due to low delivery of allocated sites. We have not made specific comments about the identified Reasonable Alternative new settlement sites at GNLP1055, GNLP2168 or GNLP0415A-G. As new settlement proposals, we support the Partnership's conclusion that it is not appropriate to allocate a new settlement in the Greater Norwich Local Plan at the current time.
- 1.5 We fully support the draft plan's objective to concentrate development in the most sustainable locations. Policy 1 correctly identifies the hierarchy of development which places the Norwich urban area in the highest part of the hierarchy including urban extensions in the fringe parishes.
- 1.6 This Statement is divided into chapter headings as follows:
1. Explanation of site proposals and remaining options for development.
 2. Consideration of the Partnership's assessment, methodology and conclusions. The Partnership's evidence which purports to have led to the preferred site allocation conclusions appears to be limited to that contained in the HELAA, relevant area Site Assessment Booklets, Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). This Statement considers only sites GNLP0332R and GNLP0334R and a high level comparison with other relevant sites within the Norwich Fringe referred to in paragraph 1.4 above.
 3. Introduction and explanation of the landowner's team assessment of the key issues
 - Proximity and access to facilities and services
 - Landscape/Townscape
 - Ecology/Opportunities for bio-diversity gain
 - Arboricultural impact
 - Provision of open space and access to wider green infrastructure gains
 - Airport safety
 - Flood risk
 - Highways
 - Heritage assets
 4. Summary of policy objections
 5. Recommended modifications to policy



2 SITE PROPOSALS AND OPTIONS FOR DEVELOPMENT

Site proposals

2.1 These representations reference the suitability for development of two sites:

- GNLP 0334R – 11.7ha situated immediately to the west of Reepham Road and directly adjoining the built-up area of Hellesdon. The site is estimated to be capable of accommodating 250-300 dwellings together with additional green infrastructure and open space.
- GNLP 0332R – 64 ha situated immediately to east of Reepham Road, west of Holt Road and south of Holly Lane. The southern boundary of the site lies immediately adjacent to the existing built-up area of Hellesdon. The north eastern boundary lies immediately adjacent to the existing Norfolk County cricket ground (also in in the landowner's ownership but outside of the promotion site) and the NEST Community Hub owned and managed by the Norwich City Sports Community Foundation. The site also includes the 11.08 hectares of allocated recreational open space referred to previously as HEL 4 and allocated in the Broadland Site Allocations DPD 2016. The current draft GNLP refers to this site as GNLP1019 and proposes to maintain the same allocation (Refer to separate representation made on behalf of landowners).

The GNLP0332R site is bisected by the Public Safety Zone which relates to the Norwich International Airport (NIA) take-off and landing safety zone where local planning authorities are advised on appropriate forms of development by DfT Circular 01/2010 'Control of Development in Airport Public Safety Zones. The proposals for the site have been developed in full recognition of the public safety advice and do not contain any inappropriate forms of development. The site is estimated to be capable of accommodating 600-700 homes, substantial areas of open space and green infrastructure and areas of employment development.

Alternative options for development

- 2.2 The earlier submissions made at previous stages of the local plan preparation contained a number of alternatively sized development areas but have been modified in line with evidence and views expressed by stakeholders. Although we believe the sites as promoted should be considered as preferred allocation sites in the form suggested, there remain further opportunities to consider modifying the proposals if and as appropriate.
- 2.3 If the Partnership would wish to investigate either the removal of the employment area from site GNLP 0332R or the allocation for residential and open space purposes of only one of the two sites then the landowners are prepared for dialogue.
- 2.4 **Remove or reduce employment area:** Given the suggestion from officers of the Partnership that there is no requirement for additional employment land within the local plan area, the landowner is prepared to investigate the possibility of removing or reducing the extent of the proposed employment



area from the current promotion. The accompanying evidence retains the employment area so that the evolution of the proposals can be appreciated and understood.

- 2.5 **Allocation of single standalone sites:** While promoting both sites as suitable for development and supported by evidence the landowners continue to maintain the view that each site is entirely capable of being allocated and developed as standalone areas. The landowners are prepared to consider alternative options if supported by evidence that less than the full allocation were necessary to meet appropriate objectives of the local plan and comply with the requirements of the NPPF.

3 GNDP CONSIDERATION OF SITE SUITABILITY

- 3.1 The NPPF at paragraph 35 explains that in order to be 'sound', local plans should be;

***“Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed need; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

***Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

***Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;*

***Consistent with national policy** – enabling the delivery of sustainable development in accordance with policies in this Framework.”*

- 3.2 In our view, the evidence base prepared by the Partnership, while purporting to support the chosen allocations at GNLP0337 and 'reasonable alternatives' at Costessey (GNLP0581 and GNLP2043) and reject 'unreasonable' sites at 0332R and 0334R fails to meet the requirements of the NPPF for the plan to be **justified**. The allocation of sites for such a large proportion of the housing requirements of the local plan area is such a fundamental part of the plan's function and objective that to fail to adequately justify the conclusions on this aspect renders the plan not sound.

- 3.3 The evidence base provided as part of the current consultation process must be sufficiently robust to have reached the conclusions identified and yet it appears flimsy at best. Paragraph 038 of the Planning Practice Guidance Notes states:

“The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.” (Paragraph 038 Reference ID 61-038-20190315)



3.4 Sites GNLP0332R and GNLP0334R were considered at various stages of the HELAA process and then again in the further evidence gathering process which are reported on in the relevant area Site Assessment Booklets. Both sites were considered throughout these processes to be suitable for development. The HELAA RAG comparison tables identified site 0332R as green (defined by the HELAA generally as acceptable) and amber (defined by the HELAA generally as any harm being capable of mitigation) for all categories except compatibility with neighbouring uses for which it was identified as red (defined by the HELAA as “*Neighbouring/adjoining uses to the proposed site would be incompatible with the proposed development type with no scope for mitigation*”). See paragraphs 4.17-4.18 and appended evidence prepared by Airfield Wildlife Management Ltd for commentary and landowner’s evidence on this category. The HELAA RAG comparison table identified site 0334R as green or amber for all categories.

Site Reference	Categories													
	Site access	Access to services	Utilities Capacity	Utilities Infrastructure	Contamination/ground stability	Flood Risk	Market attractiveness	Significant landscapes	Sensitive townscapes	Biodiversity & Geodiversity	Historic environment	Open Space and GI	Transport & Roads	Compatibility with neighbouring uses
GNLP0332R	Amber	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Amber	Green	Amber	Amber	Red
GNLP0333	Amber	Amber	Amber	Green	Green	Green	Green	Green	Amber	Amber	Green	Green	Amber	Red
GNLP0334R	Amber	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Amber	Green	Green	Amber	Amber

3.5 One might have anticipated further proportionate evidence to be gathered in the subsequent assessment processes to identify the full extent of any remaining concern, possible mitigation and, where identified as red, to test the accuracy of such a conclusion. However, this does not appear to be the case. The methodology which followed and explained in the Site Assessment Booklet continues to identify both sites up to and including stage 5 of a seven stage process as Reasonable Alternative sites. Page 13 of the Site Assessment Booklet for Horsford, Felthorpe and Haverlingland states “*for purposes of Sustainability Appraisal, suitable sites are those which are considered to be Reasonable Alternatives.*” Paragraphs 3.11-3.13 of this statement consider the quality and robustness of the SA assessment.

3.6 Stage 7 of the Site Assessment Booklet under the heading of ‘Settlement Based Appraisal of Reasonable Alternative Sites’ and in the identification of preferred site/s (where appropriate) states:

“Eight reasonable alternative sites have been identified in the Horsford, Felthorpe and Haverlingland cluster at stage 5. These sites were considered to be worthy of further investigation to look at their potential for allocation as the initial assessment did not flag up any major constraints that would preclude allocation. These sites have been subject to further discussion with Development Management, Highways, Flood Authority and Children’s Services in order to identify preferred sites for allocation and their comments are recorded



under stage six above. As part of this further discussion it was decided that Site GNLP0264 was the most appropriate site to allocate for 30-40 dwellings due to its brownfield nature within the existing built-up area of the village. None of the other reasonable alternative sites were considered to be suitable for allocation, some on highway grounds, some on landscape and airport safety grounds, one on ecological grounds and one because it was deemed to be too small to accommodate the minimum size of allocation.”

3.7 The reasons stated for site GNLP 0332R being unreasonable are:

“This site was considered worthy of further investigation due to its location as an urban extension to Hellesdon. Development here would benefit from proximity to the extensive range of services and facilities in Hellesdon. However, the site raises potentially significant landscape issues given the scale of development and setting between the existing built edge and the Broadland Northway and it is therefore not considered to be reasonable for allocation. Noise and safety concerns with the airport are also critical. Surface water suds are unlikely to be allowed due to the potential to attract birds.”

3.8 The reasons stated for site GNLP 0334R being unreasonable are:

“This site was considered worthy of further investigation due to its location as an urban extension to Hellesdon. Development here would benefit from proximity to the extensive range of services and facilities in Hellesdon. However, the site is not considered to be reasonable for allocation as it would represent a significant expansion into the countryside and would impact on the character of Reepham Road. Noise and safety concerns linked with the airport are also critical. Surface water suds are unlikely to be allowed due to the potential to attract birds. Roadside trees may impact on achieving suitable access.”

3.9 Seeking further detail to justify these reasons we find that the only possibly relevant but unsupported by evidence comment presented between stage 5 and stage 7 was from Development Management as follows:

GNLP0332R

“The site raises potentially significant landscape issues given scale of development and setting between existing built edge and NDR. Critical would be how it relates to existing settlement so that it is an integrated urban extension and not an ‘add on’. Character of Reepham road feels different to character of A140 due to its proximity of airport and NDR junctions. Noise and safety concerns with airport also critical. Airport would not permit surface



water suds in this proximity to airport due to risk of bird strike. South-west of the site allocated as recreational open space under HEL4.”

GNLP0334R

“Site would be a significant expansion into countryside and impact character of Reepham Road. Critical would be how roadside trees are dealt with to provide access as these provide attractive feature. Also, critical how site relates to existing built form and services so that it is an integrated urban extension. Noise and airport safety issues. CWS to west which may need buffer.”

Inconsistent approach to assessment of site GNLP0337

- 3.10 While it is disappointing to find no evidence supporting the stated reasons for concluding that sites GNLP0332R and GNLP0334R are unreasonable for allocation it is also confusing to find an inconsistent approach to identifying GNLP 0337 as suitable for a preferred allocation. The site Assessment Booklet for Taverham contains a similar HELAA comparison RAG table to that contained in the Horsford, Felthorpe and Haveringland site Assessment Booklet. Other than for compatibility with neighbouring uses, the assessment has very similar conclusions to those for GNLP0332R and GNLP0334R. However, despite being in the only location between the built edge of Taverham and the NDR (referred to also as Broadland Northway), representing a significant expansion into the countryside and considerably more visible from receptors in landscape terms to sites 0332R and 0334R the preferred allocation site (0337) conclusions and indeed Development Management comments contain no reference to any landscape or character concerns. Furthermore, the assessment of GNLP 0337 makes no mention of the criticism raised for sites 0332R and 0334R concerning the possible concerns of the Airport in relation to surface water suds. Although further distant from the airport, site 0337 is still within the 13km radius safeguarding zone where bird strike impact should be queried and where surface water suds should be assessed.

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

- 3.11 The SA and SEA (January 2020) provide no further illumination of the Partnership’s assessment or evidence to support the conclusions. All Reasonable Alternative sites are given only very high level consideration under fifteen categories:
- Air quality and noise
 - Climate change Mitigation and Adaptation
 - Biodiversity, Geodiversity and GI
 - Landscape
 - Housing
 - Population and Communities
 - Deprivation
 - Health



- Crime
- Education
- Economy
- Transport and Access to Services
- Historic Environment
- Natural Resources, Waste and contaminated land
Water

3.12 One would expect to identify some detailed assessment to have informed the conclusions of the site assessment at least in relation to those categories which the site assessment process used to conclude sites 0332R and 0334R were unreasonable:

- Landscape/Townscape
- Noise and safety, including the need for surface water SUDs
- Loss of trees
- Suitable access

3.13 In fact, the SA does not assess all of the same categories. Where it does, it identifies landscape impact as a minor negative on local landscape character. There is no assessment of noise or airport safety, loss of trees or the impact of access. Even the supposed assessment of landscape impact is done so at a very superficial level. Paragraph 2.7.5 of the SA/SEA (January 2020) states:

“The assessment of sites is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available.”

Assessment and delivery of ‘Reasonable Alternative’ sites at Costessey

3.14 The site assessment process has also identified two sites, (GNLP0581 and GNLP2043) in Costessey directly adjacent to one another as ‘Reasonable Alternative’ sites to be brought forward “should this prove to be required due to low delivery of allocated housing sites”. In our view, if sites are to be identified in a local plan as sites to be brought forward in certain future possible circumstances and benefit in some way from the presumption in favour of adopted up to date planning policy under s 38(6) of the Planning and Compulsory Purchase Act 2004 then those sites must also be fully justified and deliverable in line with all plan making guidance.

3.15 Given the stated need for site 0581 to be delivered in conjunction with site 2043, the delivery of both sites is severely constrained. The assessment contained in the Costessey area site assessment booklet concludes



“The site is not currently preferred for allocation as limited evidence has been submitted regarding its deliverability. Availability of third party land to deliver proposed accesses has to be confirmed. Access to Long Lane for all traffic would not be appropriate.”

- 3.16 Furthermore, the same assessment states that there are queries over the landscape impact of development located in one of the normally most highly protected local designations of landscape control – a designated river valley.

“There are issues regarding access and the site’s location in the Norwich Southern Bypass Protection Zone and designated river valley.”

- 3.17 In our view, the approach and conclusions which identify these two sites as Reasonable Alternatives are firstly inconsistent with that adopted in the case of sites GNLP0332R and GNLP0334R and secondly are not supported by evidence which justifies the conclusions. Equally, these sites cannot be confirmed as reasonably deliverable within the plan period. In all circumstances, such conclusions render the plan not **justified** and not **effective** as required by paragraph 35 of the NPPF (paragraph 3.1 above)

Allocation of recreational open space (carried forward of allocation HEL4 from Broadland Site Allocation DPD)

- 3.18 Site GNLP0332R includes 11.08 hectares of allocated recreational open space referred to previously as HEL4 and allocated in the Broadland Site Allocations DPD 2016. The current draft GNLP refers to this site as GNLP1019 and proposes to carry forward the same allocation (Refer to separate representation made on behalf of landowners).
- 3.19 As explained elsewhere in this statement, substantial areas of additional recreational open space would be provided as part of the proposals to develop sites GNLP0332R and GNLP0334R. As also explained, approximately half of the HEL4 allocation has already been provided under a lease arrangement with Hellesdon Parish Council. That land has been laid out as an open field which we understand is used by local residents largely for dog walking. The lease contains provisions for the open space to be relocated if appropriate.
- 3.20 The landowners are unclear about the Partnership’s evidence to support the draft allocation for the 11.08 hectares of recreational open space. The site Assessment Booklet for Hellesdon explains simply:

“The site is the same as existing allocation HEL4 from the Broadland Local Plan. HEL4 is allocated for recreational open space. Site GNLP1019 seeks to maintain this allocation in the new local plan to 2038.”

- 3.21 The Local Plan evidence base includes the Greater Norwich Local Plan Infrastructure Needs Report (undated and author un-named). In the body of the report there is reference to the Greater Norwich Sports Facility Strategy 2015 which sets out demand increases for sports halls and swimming pools.



There is no reference to recreational requirements for either formal or informal open space. The chapter headed 'Open Space and Green Infrastructure' contains only a plan showing the Greater Norwich green infrastructure corridors, a network which, as explained elsewhere in these representations, could be given a major boost by encouraging development on sites GNLP0332R and GNLP0334R.

- 3.22 In our view, unless and until appropriate evidence is prepared, the draft allocation for recreational open space on 11.08 hectares of land at Reepham Road should be deleted. The landowners continue to encourage dialogue with all relevant parties, including the parish councils in order to identify the most appropriate provision of recreational open space to meet the requirements of various forms of outdoor recreation.

4 LANDOWNER'S ASSESSMENT OF KEY ISSUES

- 4.1 In stark contrast to the Partnership's evidence leading to their assessment of sites GNLP0332R and GNLP0334R as two 'unreasonable' sites, the landowner's assessments of the key issues have been appropriate and proportionate to the stage of the plan preparation, methodical, thorough and have informed the suitability, extent and detail of potential site developments. These assessments have been used as an evolutionary and iterative process. The extent of site boundaries, capacities and detail have emerged from the assessment work undertaken. This approach is considered to be wholly in alignment with the approach recommended by paragraph 038 of the PPG (reference paragraph 3.3 above). The findings of the Landowner's various assessments in regard to the key issues demonstrate that the Partnership's comparative assessments, based on unsubstantiated comment/observation from the Council's Development Management team (Paragraph 3.9) are entirely unfounded and have therefore misdirected the assessment of site suitability contrary to the requirements of local plan preparation contained in paragraph 35 of the NPPF and paragraph 038 of PPG.
- 4.2 The following represents a short summary of the findings of each relevant assessment and includes references to discussions undertaken with relevant stakeholders. These summaries should be read in conjunction with the various technical assessments appended to these representations.

Proximity and access to facilities and services

- 4.3 There appears to be largely agreement between the landowners and the Partnership's assessments in this category. For both sites, the site assessment booklet concludes:

"Development here would benefit from proximity to the extensive services and facilities in Hellesdon"

- 4.4 The previously submitted Position Statement appended to this representation contains at Appendix B a facilities plan. Additionally, and in contrast to the preferred allocation site at Taverham (GNLP 0337) the sites are located within easy walking and cycling distance of existing major employment areas



immediately to the south of Norwich International Airport, to a public transport hub at the park and ride facility on Holt Road and a major new and expanding sports and recreation facility operated by the Norwich City Community Sports Foundation, known as The NEST.

- 4.5 The landowner's representatives have liaised closely with the management team of the Foundation and have jointly identified opportunities to concentrate any requirements for recreational open space which fairly and reasonably relate in scale and kind to the needs of the proposed development adjacent to the existing facility. Such an arrangement could enhance and expand the already state-of-the-art community hub and recreation facility onto the landowner's site as part of any residential development and combine multi-functional recreational open space and green infrastructure. More detail is provided in the appended illustrative development framework plan. In addition to providing enhanced and expanded facilities, the Foundation have expressed a desire to improve pedestrian and cycle access through site 0332R which would increase the ability of residents in Hellesdon to access facilities.
- 4.6 In addition to access to existing services and facilities in the immediate area, the scale of the proposed development on the combined sites 0332R and 0334R would be likely to require the provision of improvements to other facilities and services proportionate to the proposed development.

Landscape/Townscape

- 4.7 The Landscape and Visual Appraisal appended to these representations prepared by Robert Myers Associates considers potential landscape and townscape implications of any proposals to develop sites 0332R and 0334R. The Appraisal concludes that the impact of development would be limited, can retain the key existing features of the local landscape and with appropriate mitigation could substantially improve landscape quality and the contribution of the site to bio-diversity and recreation objectives.
- 4.8 The appended illustrative development framework plan (included in the Landscape Report), Landscape Appraisal, Tree Survey and Constraints Plan and Access and Transportation Strategy demonstrate that the Partnership's statements concerning significant landscape issues, impact on the character of Reepham Road and possible impact on trees are entirely unfounded and have therefore misdirected the assessment of site suitability.

Ecology/Opportunities for bio-diversity gain

- 4.9 Wild Frontier were engaged in 2019 initially to assess the impacts of development on four possible sites in the area all in the landowner's control. Following initial advice on a number of topics one of the four sites was taken no further and a second was considerably reduced in size to the west of the existing Manor Farm buildings in Holly Lane.
- 4.10 The Preliminary Ecological Appraisal confirms that there are no ecological reasons to resist development of sites 0332R and 0334R. The Appraisal makes a number of helpful recommendations



to protect and enhance biodiversity in the area. All suggested mitigation can be incorporated into the development of the sites.

Arboricultural Impact

- 4.11 A comprehensive tree survey has been undertaken by Hayden's and recommendations made. The work carried out in assessing the development potential and opportunity for development on the site has taken full account of the Tree Survey and Constraints Plan. The Access and Transportation Strategy demonstrates that access routes to the site along Reepham Road can be sited within gaps in the existing roadside tree belts. On the basis of the access strategy appended to these representations only one 'B' category tree would require removal. In the event of site development, a considerable number of additional trees and hedgerows would be planted.
- 4.12 The Partnership's stated concern that roadside trees may impact on achieving suitable access are clearly unfounded.

Provision of open space and access to wider green infrastructure gains

- 4.13 The landowners have an established track record in working in partnership with Broadland Council and others to extend provision of and access to open space and green infrastructure. Examples include the commitment to providing additional footpath links to wider green infrastructure assets as part of the development of a site for 250 homes at Hall Lane, Drayton and the provision of open space on part of the existing allocated HEL4 site at the south western corner of site 0332R. Following discussions with Hellesdon Parish Council, approximately 5 ha is leased to Hellesdon Parish Council.
- 4.14 Allocation and subsequent development of sites 0332R and 0334R raise the genuinely deliverable opportunity to provide additional multi-functional open space related to the needs of the development and further access links to the wider network of green infrastructure. These links can be provided on land beyond the development sites but in the same ownership as the sites. The landowners are keen to continue to work with relevant authorities in the delivery of Broadland Council's West Broadland Green Infrastructure Project Plan.
- 4.15 As explained in paragraph 4.5 above following discussions with the Norwich City Sports Community Foundation, development of the sites affords the opportunity to provide some open space requirements in conjunction with the Foundation, thereby delivering a comprehensive planned most robust form of facilities for the benefit of the new and existing community. The sites would be capable of delivering substantial areas of multi-functional recreational open space throughout the site for the benefit of both new and existing residents.
- 4.16 While noting that the existing HEL4 allocation for recreational open space is suggested to be carried forward in the current GNLP we have been unable to identify any up to date evidence to justify the allocation of the suggested scale or location of the HEL4 allocation without additional development.



Specific representations have been made in this regard. In any event, it is worth noting that part of this allocation has been delivered by the landowners in partnership with Hellesdon Parish Council.

Airport safety

- 4.17 The landowner's representatives have engaged with the safeguarding team of NIA in order to understand and assess all potential airport safety issues. The emerging illustrative development framework plan takes full account of the requirements of the airport both in terms of development within the Public Safety Zone (PSZ), the heights of buildings, impact on landing lights and the necessary mitigation for bird hazard risk. In addition to direct engagement with NIA and on their recommendation, the landowners appointed Airfield Wildlife Management Ltd to provide a Bird Hazard Risk Assessment and Management Plan. The Assessment and Plan is appended to these representations. It concludes that the proposed development can be constructed, maintained and managed with no increase, and some significant reductions, in the local birdstrike hazard. The Plan makes a number of recommendations concerning, for example the avoidance of areas of standing water and selection of particular plant species. All of these recommendations can be incorporated into the development. The appointed drainage engineers have worked in partnership with Airfield Wildlife Management to ensure that surface water suds features are appropriately designed and sized.
- 4.18 The Partnership's stated concerns about airport safety bird strike dangers are clearly unfounded

Surface water drainage

- 4.19 Following assessment and interpretation of local permeability rate data carried out in June/July 2019, the appointed drainage engineers have concluded that a suitable drainage scheme can be designed to accommodate the development while also recognising the requirements of airport safety (paragraphs 4.17-4.18 above)

Access strategy

- 4.20 An Access and Transportation Strategy prepared by Richard Jackson Engineering Consultants is appended to these representations. The Strategy concludes, after assessments carried out in June/July 2019 that both sites 0322R and 0334R can be satisfactorily accessed for motorised vehicles, cycles and pedestrians. The Strategy also concludes that satisfactory and safe access can be achieved for either both sites together or as single standalone sites without unnecessary destruction of existing roadside trees. The Strategy contains appropriate drawings demonstrating its conclusions.

Heritage assets

- 4.21 An assessment undertaken by Orion appended to these representations concludes that there are no designated assets which would be negatively impacted by development on the site and that archaeological remains of national significance are not expected.



Delivery

- 4.22 We can confirm that if allocated any development on the site can be easily delivered and commenced within the first five years following adoption of the local plan. The sites are in single ownerships and do not require any third party land to achieve development.
- 4.23 There are no known factors or issues which would compromise the viability or delivery of the site within the relevant policy requirements.

5 SUMMARY OF REPRESENTATIONS

5.1 On behalf of Drayton Farms Limited and RG Carter Farms Limited we submit representations on the following matters:

- Support Policy 1's general strategy which seeks to distribute housing growth in line with a settlement hierarchy placing the Norwich urban area including urban extensions in the Norwich fringe parishes at the highest level.
- Object to the allocation of at least 1400 homes on site GNLP0337 (Taverham), identification of sites GNLP0581 and GNLP2043 at Costessey as reasonable alternatives to be brought forward should this prove to be required due to low delivery of allocated sites and identification of sites GNLP332R and GNLP334R as 'unreasonable'. In our view these conclusions have not been justified as required by paragraph 35 of the NNPF. Sites GNLP0581 and GNLP2043 cannot be categorised as being reasonably deliverable. Given the scale of proposed allocations involved, being a large proportion of the new allocations to meet housing requirements in the plan area, the issues raised are fundamental to the plan's function and objective. As such the approach and conclusions fail to demonstrate that the plan as a whole is **justified** and **effective**.
- Note the importance of identifying sufficient contingency sites given the specific issues related to the delivery of particularly complex sites in the East Norwich Strategic Regeneration Area. Policy 7 confirms the concentration of a further large proportion of the plan's new allocations (1,220) on three complex sites in the East Norwich Strategic Regeneration Area in addition to an existing as yet undelivered commitment (780).
- Object to the allocation of 11.08 hectares of land at Reepham Road for recreational open space. The allocation has not been justified by evidence.

6 RECOMMENDED MODIFICATIONS TO POLICY

6.1 It is recommended that a robust and consistent assessment with appropriately proportionate evidence is undertaken to assess the suitability of sites GNLP0332R and GNLP0334R. Given the assessments already prepared by the landowner's team and appended to these representations the evidence to allocate both sites is compelling.



- 6.2 The submitted illustrative development framework plan suggests a possible form of development involving c600-700 dwellings on GNLP0332R and c250-300 dwellings on GNLP0334R both together with substantial additional recreational open space and green infrastructure. Further liaison with the Partnership would develop more detail associated with site expectations to be included in a policy which allocates the sites.
- 6.3 It is recommended that without evidence to support the allocation of 11.08 hectares of land for recreational open space on land at Reepham Road without additional residential development, the proposal to simply carry forward the allocation of HEL4 is deleted.



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