

Date: 13th March 2020

FAO GREATER NORWICH GROWTH BOARD

Email only to: mike.burrell@norfolk.gov.uk and carole.baker@norfolk.gov.uk

To whom it may concern,

RE: GREATER NORWICH LOCAL PLAN REG. 18, STAGE C DRAFT STRATEGY AND SITE ALLOCATIONS - LAND WEST OF BADERSFIELD/SCOTTOW ENTERPRISE PARK/FORMER RAF COLTISHALL SITE.

These written representations are submitted on behalf of Glavenhill Limited to the Greater Norwich Local Plan (GNLP) Regulation 18, Stage C Draft Strategy and Site Allocations Process to promote 28.1 ha of predominantly grade 3 agricultural land to the west of the village of Badersfield and Scottow Enterprise Park for a sustainable mixed-use development.

The site is already promoted through the earlier Greater Norwich Local Plan Regulation 18, Stage A Site Proposals and Growth Options process in March 2018 and assigned the site reference GNLP0294. The site was previously promoted for a mixed-use development comprising in the range of 300-400 new homes (including affordable housing); an 80-bed care home for the elderly/people with dementia; 5 ha of new employment space; some 12 ha of public open space including the planting of 100,000 new trees; and a site for a new Primary School. The previous representations and the subsequent representations submitted under the cover letter dated 19th June 2019 that outline the technical suitability of the site also remain relevant.

Since this earlier promotion, the emerging development proposals have been refined, viability tested and carefully worked-up into a deliverable new residential-led mixed-use scheme. The emerging scheme is explained on the presentation boards attached within Appendix A that also form part of this representation.

The land promoted within Broadland District Council area is immediately available for use.

The current Badersfield and Scottow Enterprise Park mixed-use urban extension proposals

The promoted scheme is a sustainable mixed-use extension to the village of Badersfield and Scottow Enterprise Park within the former RAF Coltishall airbase. The total 48.8 ha site hereby promoted is cross-boundary with part of the site (some 20.7 ha) located within North Norfolk District Council area.

The 28.1 ha part of the site within Broadland District Council area that is being promoted through the Greater Norwich Local Plan will deliver the following mix of uses:

- Approx. 300 new dwelling units including affordable housing and First Homes;
- Allotment growing spaces for each new dwelling proposed;
- 1 ha of land and sufficient pupils (pupil product from 1,890 existing resident population plus the new future growth) to sustain a new 210 pupil one form of entry Primary School;
- New commercial employment and retail units;
- Large areas of new semi-natural publicly accessible open space;

- 100,000 new trees (also being delivered across North Norfolk District Council area) to capture 200,000 tonnes of CO₂ each year;
- Funding to deliver and a resident population to sustain (as start-up, daily spend and contraflow) a new peak hours' bus service between the site, the existing village of Badersfield, work spaces at Scottow Enterprise Park and the existing Worstead rail station providing a regular extended hours rail service to Norwich City-centre;
- Water positive drainage infrastructure to capture waste-water from the new residential areas for use on site and the surrounding farmland; and
- New HGV route (in combination with land within North Norfolk District Council area) from the B1150 to Scottow Enterprise Park to further diversify employment.

To be clear the majority of the land promoted to deliver the complete mixed-use urban extension is within Broadland District Council area. The key benefits and infrastructure improvements outlined above will be delivered through an allocation in the Greater Norwich Local Plan. The remainder of the site that delivers other linked benefits is being promoted through the emerging North Norfolk Local Plan.

The promoter and land ownership remain unchanged from the Stage A submission in March 2018 and the subsequent representations made in June 2019.

The new presentation boards explaining the opportunity are contained within Appendix 1.

Further emerging Local Plan representations made by Glavenhill

This mixed-use urban extension to the village of Badersfield and Scottow Enterprise Park site is being promoted through the Greater Norwich Local Plan as an alternative to nil housing growth in the village of Wroxham (that is defined as a Key Service Centre where new growth capacity issues exist) where planned development is normally encouraged; and the 20-25 dwellings proposed for the Coltishall with Horstead Belaugh village cluster defined in the emerging Local Plan. Both settlements are a short motor car journey from the land promoted.

My client contends that the land promoted adjacent to Badersfield and Scottow Enterprise Park has sufficient service, landscape, infrastructure, traffic and environmental capacities to accommodate the scale of growth proposed by Glavenhill in this and subsequent Local Plan reviews.

For information this mixed-use urban extension is also being promoted as an alternative to planned housing growth in the village of Hoveton (where similar ecological, traffic and pollution constraints apply) and some of the new growth planned for North Walsham (where the housing delivery rates will certainly not achieve the delivery targets suggested) in North Norfolk District Council area.

The overall approach will require cross-boundary working between Broadland District Council, North Norfolk District Council and the Greater Norwich Development Partnership to deliver the complete vision. This approach accords with Government guidance contained in paragraph 60 of the National Planning Policy Framework (NPPF).

My client also objects to the level of planned small-scale housing growth within the Coltishall with Horstead Belaugh village cluster as it is located on the edge of the Norfolk Broads National Park. Whilst my client supports the broad development location it is clear that this new would be better focused around Scottow Enterprise Park away from The Broads National Park.

My client also has concerns regarding the over-reliance in the emerging Greater Norwich Local Plan on the wider village clustering approach in so far as it applies/may apply to the more remote rural areas beyond the former Norwich Policy Area (that has traditionally been the focus for growth) as advocated under Policy 7.4. This is because without evidence to the contrary there could be a clear disconnect between the main employment and service centres such as Scottow Enterprise Park and the more rural village clusters identified/not yet identified. In the absence of a clear growth strategy and information regarding the cluster locations, my client wishes to raise an objection. My client contends that a significant part of this defined/undefined planned rural cluster growth should be relocated adjacent to the village of Badersfield and Scottow Enterprise Park.

My client's Badersfield and Scottow Enterprise Park extension proposals will deliver a scale of growth that is designed to encourage and facilitate public transport, employment, education, recreation and infrastructure improvements in this part of the rural area. This approach will reduce motor car use in Broadland District Council area and further the Local Plan's stated climate change ambitions.

We contend that the expansion of the village of Badersfield adjacent to Scottow Enterprise Park is a good location for major housing growth over the emerging Local Plan period. The delivery of the new HGV route and the peak-hours public transport improvements will improve and diversify existing employment provision within Scottow Enterprise Park. This growth will also improve living conditions and the amenities of residents in the village of Badersfield. These deliverable access improvements will further the stated aim of paragraph 5 of the emerging Local Plan to **"...turn our world class knowledge and ideas into world class jobs, particularly in sciences and bio-technology, agri-tech, food and drink, information and communication technology (ICT), digital creative industries and high-value engineering..."**.

To maximise the employment improvements that could be facilitated my client also contends that the employment growth target should be more ambitious and increased to 45,000 new jobs over the emerging Local Plan period as previously proposed. This new number should be specified within emerging Policy 1 of the emerging Local Plan that does not currently identify any target figure.

The presentation boards contained within Appendix 1 (should be read in conjunction with the previous representations submitted) explain the opportunity, the technical suitability of the site, the sustainability credentials of the scheme and wider community, the transport benefits and show how the site could be laid out in more detail.

The emerging Badersfield and Scottow Enterprise Park extension scheme has to-date been designed having regard to known local housing needs; existing community and service provision; the clear opportunity for people to live close to where they (could) work; and providing allotment spaces and a supply of water for residents to grow their own food. Access to an allotment for growing will be an option open to all future residents regardless of house size, status or tenure type. The allotments will be located at the centre of the community to encourage healthy lifestyles, foster social inclusion and create social, educational and employment opportunities.

The scheme will also deliver and equip some 12 ha of new strategic open space in the form of planted woodland and semi-natural grassland. This is an opportunity to provide a large publicly accessible recreational open space in a location that is accessible to the City of Norwich and its wider suburban hinterland at no cost to the public purse. Laying out this open space and tree planting is fully costed and will be delivered to offset the impacts of planned housing growth on the network of Natura 2000 sites including The Broads National Park.

For this reason, my client also objects to emerging allocation BAW2 relating to Bawburgh and Colney Lakes as it is not effective as it is privately owned, currently let to a third party, no public access to the site is achievable and it is not available to offset the impacts of housing growth. In the absence of evidence to the contrary the BAW2 allocation is unsound and should be removed from the emerging Local Plan.

In addition to the other benefits, my client also proposes the use of sustainable wastewater capture and re-use in the Badersfield and Scottow Enterprise Park extension scheme. This approach is designed to reduce and re-use the surface and clean wastewater run-off from the site. This will reduce surface and fluvial flooding impacts from the scheme as well as seasonal ground and river Bure extraction in the Summer months.

In summary

The emerging mixed-use scheme is a clear vision that shows how sustainable planned development at the right scale and in the right location is able to deliver the emerging Local Plan's sustainability, transport, employment, leisure, biodiversity and climate change objectives.

To conclude:

- The scheme will deliver a net environmental gain and act as a UK benchmark for sustainable planned housing and employment growth;
- The provision of a large new publicly accessible semi-natural open space will act as a local recreation and leisure destination to reduce the pressure of the network of Natura 2000 sites in Broadland District including The Broads National Park;
- It will deliver transport and community infrastructure improvements to sustain and grow jobs;
- The site has no over-riding constraints that would prevent its development;
- The site benefits from a willing landowner and a committed land promoter that will bring the site forward for development within the emerging Local Plan period;
- The scheme delivers sustainable water infrastructure improvements to reduce flooding and ground water abstraction in Norfolk;
- The public open spaces, water storage reservoir and allotments proposed will be valuable recreational spaces to improve health and well-being locally;
- The new native woodland proposed will enhance natural landscape beauty locally and deliver recreational, landscape and carbon capture benefits to the City of Norwich;

- The site is attractive to small and medium-sized housebuilders who currently find it difficult to compete for and deliver larger strategic sites and will provide additional choice to the local housing market;
- Siting the new Primary School next to the woodland and semi-natural spaces (and encouraging the School to make the most of this green space) could allow children greater access to nature in and outside of School;
- It has received good interest from local house builders, who offer their support to these representations; and
- The scheme facilitates the delivery of a new Primary School.

I trust that this representation meets with your approval and attached presentation boards are of assistance to you and your colleagues in understanding the scheme and concluding the suitability, sustainability and deliverability merits of the proposed allocation site in preference to other constrained and inferior more rural growth locations.

I thank you for taking the time to read these representations and I look forward to your further contact.

Yours faithfully,

Philip Atkinson
Director



Brettingham House, 98 Pottergate, Norwich NR2 1EQ
T 01603 631 319 F 01603 628 464 E info@lanproservices.co.uk

APPENDIX 1 - BADERSFIELD/SCOTTOW ENTERPRISE PARK PRESENTATION BOARDS

DRAFT