

REPRESENTATION TO THE GREATER NORWICH LOCAL PLAN SITES DOCUMENT - REGULATION 18 CONSULTATION

RESPONSE TO SITE ALLOCATION UPLIFT FOR CRINGLEFORD

ON BEHALF OF

**BARRATT DAVID WILSON HOMES (EASTERN
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Appendices:

1. Landscape Overview – dated March 2020
2. Preliminary Ecological Appraisal – dated February 2020
3. Air Quality Technical Note – dated 10th March 2020
4. Technical Note on Noise – dated 2nd March 2020

1. INTRODUCTION

- 1.1 This response to the draft GNLP Sites document is submitted on behalf of our client, Barratt David Wilson Homes (BDW), and relates to the proposals at Cringleford. The document identifies our client's site at Newfound Farm as a preferred housing allocation (site GNLP0307) along with an adjoining site (GNLP0327). The preferred allocation seeks to increase the housing numbers at this site from 1,300 (as already consented) to 1,660.
- 1.2 Our client has successfully worked with Cringleford Parish Council and officers from South Norfolk Council to secure detailed planning consent for 650 homes and a site for a new primary school at their Newfound Farm (ref. 2013/1793). This work included the prior approval of a design code to ensure that the scheme becomes a successful new community within one of the Greater Norwich area's most sustainable settlements. The Newfound Farm site is currently being built out by Barratt Developments.
- 1.3 BDW's interest relates to the part of the preferred allocation identified as GNLP0307, which BDW has previously promoted through the GNLP process for additional housing and it is within this context that these representations are made.
- 1.4 The plan extract below identifies that part of site GNLP0307 that already has planning permission for housing development and that part which remains to be considered as additional housing land as part of the preferred allocation. It also shows the relationship of the site with other commitments in this settlement.

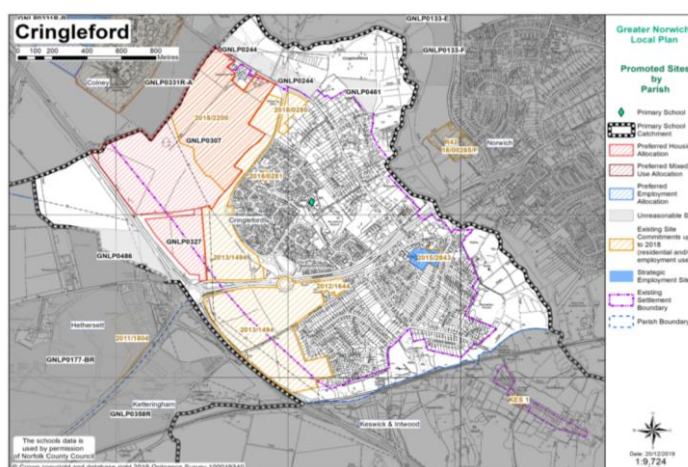


Figure 1: Proposed Cringleford Allocations

- 1.5 In response to the proposed uplift BDW has carried out additional work to support the further development of their site. This work also demonstrates that the

remainder of site GNLP0307 has the capacity to accommodate a greater number of dwellings than the uplift of 360 homes that are proposed across the balance of site GNLP0307 and site GNLP0327. The reports and plans that support the recommended uplift in numbers for site GNLP0307 are listed below and either attached as appendices to this document or submitted as separate documents:

- Landscape Overview - Prepared by CSA Environmental;
- Preliminary Ecological Appraisal - Prepared by CSA Environmental;
- Air Quality Technical Note – Prepared by MLM;
- Noise Technical Note – Prepared by MLM;
- Cringleford Vision Document – Prepared by Pegasus; and
- Land Southwest of Newfound Farm, Cringleford: Phase Two - Framework Plan ref. P18-0134_01 Rev. B



Figure 2: Land Southwest of Newfound Farm, Cringleford: Phase Two - Framework Plan ref. P18-0134_01 Rev. B

1.6 The subsequent text of this representation summarises this additional work and explains why additional housing numbers are warranted at site GNLP0307. It also provides a response to the HELAA outcomes.

2. CRINGLEFORD: PHASE TWO - FRAMEWORK PLAN

- 2.1 Phase one of the development at Cringleford relates to the consented scheme at Newfound Farm, which is being implemented. Phase two relates to the additional land that the GNLP now proposes for additional housing.
- 2.2 The Framework Plan prepared on behalf of BDW demonstrates how additional development can be delivered as a continuation to the consented scheme. It respects the existing allocation boundaries and the settlement boundary of Cringleford by retaining the strip of land adjacent to the A47 as an area of public open space. The Framework Plan also respects the existing landscape and ecological features on the site and has been informed by the work carried out by CSA and MLM. Some 11ha of net developable area has been identified, which has a capacity of approximately 500 dwellings based on an average density of 44 dwellings per hectare (dph).
- 2.3 The Framework Plan shows access to the site through two vehicular accesses points that would be accommodated through extensions of the road network of the consented phase one development. In accordance with the Neighbourhood Plan policy a further point of access is identified off the Round House Way roundabout and through an adjoining site (known as the Kier land) as a way of providing greater permeability.
- 2.4 The street hierarchy principles established on the phase one scheme have been continued into the phase two site. These include a 6.5m primary street through the heart of development, lined by 2x 2m wide verges with a 2m wide footway on one side and a 3m wide cycleway on the other side. The 6.5m width allows the primary street network to accommodate buses. Branching off from the primary street are secondary streets at 5.5m wide, followed by more informal shared surfaces and private drives as the development reaches the rural edges.
- 2.5 In accordance with the proposed site allocation, land has been reserved within the Framework Plan for additional school land. A 1ha area of land has been reserved in the northwest corner of the site for the school expansion. This is located adjacent to the school site that has already been secured through the consented phase one scheme.
- 2.6 All existing vegetation has been retained with 'green fingers' following the existing hedgerows through the site and into the residential areas. The 'veteran'

tree along the southern boundary has also been respected with an additional 15m offset of any buildings from its centre.

- 2.7 Surface water attenuation features have been shown indicatively based on the topography of the site. The existing pylons and overhead wires have been respected with a minimum 30m clearance, creating a strong green corridor through the entirety of the site.

3. ADDITIONAL HOUSING

- 3.1 Within the parish of Cringleford 1,200 homes were originally allocated through the Neighbourhood Plan 2014. At the base date of the Greater Norwich Local Plan 1,300 homes have been allocated, with consent granted for a further 61 homes. Cringleford was originally identified as a sustainable location to accommodate growth as there are good links to the University of East Anglia, Norfolk and Norwich University Hospital, and Norwich Research Park. As Cringleford is a fringe parish within the Norwich urban area it is at the top of the Sustainable Growth Strategy hierarchy identified in Policy 1 of the emerging Greater Norwich Local Plan. Therefore, the Part 2 - Site Allocations identifies an uplift in the number of homes allocated through the Cringleford Neighbourhood Plan of 360 dwellings across two existing site allocations (the balance of GNLP0307 and GNLP0327) to the southwest of the village.
- 3.2 BDW considers that it is right for the Sustainable Growth Strategy to focus development in areas around Norwich and it believes that Cringleford is an appropriate location for a proportion of this requirement. BDW's site at Cringleford (GNLP0307) extends towards the A47 and includes the consented development site (identified above as phase one) and an additional 17.82ha of land (identified as phase two), that is mainly within the existing development boundary of the village.
- 3.3 The phase two land and the land to the southeast of site (GNLP0327), have been identified to accommodate the uplift of 360 additional homes that are proposed for Cringleford. BDW support the principle of the proposed uplift but believes that the uplift should be greater to reflect the development potential of its site. BDW believes that the phase two land will form a natural extension to the consented development and will assist in supporting and enhancing that new community by delivering a successful new and sustainable neighbourhood for Cringleford.
- 3.4 The Housing and Economic Land Availability Assessment 2017 (HELAA) that has been carried out confirms that there are no constraints to the development of the

remainder of site GNLP0307, with it being identified as having utilities infrastructure and market attractiveness. Similarly, there are no constraints relating to sensitive townscapes, biodiversity, geodiversity and compatibility with neighbouring uses. The site is also seen positively with regards to open space and green infrastructure. Similarly, the adjacent site (GNLP0327) is also identified as having limited constraints to its delivery.

- 3.5 Given the positive assessment of our client's site through the HELAA it is seen as an appropriate site to accommodate further development. However, our client is concerned that the number of homes allocated to their site is not based on a robust assessment of the capacity of the site. Moreover, it is unclear what the justification is for no more than 1,300 homes to be built within the Cringleford area prior to 2026. This approach does not appear to be based on any identified constraints in infrastructure capacity that would be resolved post 2026.
- 3.6 BDW believes that it would give greater flexibility to housing delivery across the Greater Norwich area if the uplift in the number of new homes proposed for Cringleford were increased and the arbitrary limit on the delivery the period was not applied. Especially as other allocations where greater infrastructure would be needed to enable housing to be built could suffer delays in the planning and delivery phases.
- 3.7 Given the significant number of new homes that the Greater Norwich Local Plan proposes to deliver our client is concerned that there has been insufficient assessment of the number of new homes that their site could deliver. On the approved development the 650 homes have been successfully planned at a density of 44dph. BDW has applied a similar density to the 11ha of net developable land that remains within site GNLP0327 and the Framework Plan shows that the most effective use of the land would be to accommodate approximately 500 dwellings. However, the proposed uplift in the allocation would result in the phase two site and the adjacent site GNLP0327 delivering the 360 additional homes at a density of approximately 26dph, including all the necessary road and drainage infrastructure, public open space and land to accommodate the primary school site.
- 3.8 The figure of 26dph falls well below the 40dph identified for sites in the Norwich urban area under Policy 2 of the emerging Greater Norwich Local Plan. The Norwich urban area is at the top of the hierarchy of the Councils' Sustainable Growth Strategy and as such sites within it must maximise their development

potential. The approach to increasing densities in sustainable locations is in accordance with the requirements of paragraphs 122 and 123 of the National Planning Policy Framework (NPPF) and has been accepted for other development sites in the Cringleford Neighbourhood Plan area.

- 3.9 In order to demonstrate the capacity of their site BDW has carried out additional work that confirms that any constraints to the delivery of the additional land can be overcome. Therefore, the site is an ideal location for the Greater Norwich Local Plan to focus further growth in order to limit the risk of homes to be allocated through other plan processes not coming forward.

4. RESPONSE TO HELAA OUTCOMES

- 4.1 The HELAA identifies that there are no significant constraints to the delivery of our client's site. Accordingly, a number of the constraints are labelled as 'green', whereas others are identified as 'amber' in the Stage 2 HELAA Comparison Table. Where a constraint has been identified as amber BDW has provided additional information to demonstrate how the constraint can be successfully mitigated.

Site Access

- 4.2 Whilst the HELAA identifies access as an amber there are alternative ways by which the phase 2 site could be accessed by vehicular traffic. The Framework Plan for the site includes access through the Kier land, off the Round House Way roundabout, and at two locations through phase one. The site would be within 1km of Cringleford Primary School with an access onto Round House Way and connection to Dragonfly Lane. There is likely to be a need for an improved crossing over Round House Way and the HELAA identifies that it could be feasible and viable depending on scale of development.

Access to Services

- 4.3 The HELAA acknowledges that the site is within walking distance of Cringleford and the Norwich Research Park, which is a significant employment area and is well connected by local bus services. Moreover, the wider site will also accommodate a new primary school to meet the needs of the developments in this area. This is in addition to the site being within 1km from the Cringleford Primary School and the Willow Centre once an access is provided onto Round House Way.

Utilities Capacity

- 4.4 The consented development on phase one of the Newfound Farm site, and other developments in the area, will result in enhancements to the capacity of existing utilities serving this part of the village. BDW has carried out initial, high-level assessments of the increases in capacity for utilities and do not consider that there are any abnormal costs that would result in a constraint to the delivery of the phase two site.
- 4.5 The HELAA identifies potential constraints relating to wastewater treatment work capacity and sewer capacity in particular. However, these can easily be resolved through infrastructure improvement works.
- 4.6 If the Councils consider the costs of utilities provision to be a potential constraint then this further reinforces our client's view that the development potential of the sites needs to be maximised through increasing the density so that any costs of enabling works do not impact negatively on the level of affordable housing that is provided.

Contamination/Ground Stability

- 4.7 When considering the outline application for the phase one scheme conditions were attached to the planning consent to address matters relating to ground contamination. These conditions (nos. 32 and 34) required a scheme to deal with the risks associated with ground contamination and a long-term monitoring and maintenance plan to be submitted for approval in writing by the Local Planning Authority. A Phase 2 Geo-Environmental Assessment Report and a Contamination Monitoring and Maintenance Plan were subsequently submitted under ref. 2016/2695 and were approved on 16th November 2016. In addition to the conditions that required formal discharge before development commenced on site, Condition 35 requires a remediation strategy to be submitted for approval if contamination is found on site.
- 4.8 The above approach to dealing with issues of ground contamination through planning conditions on phase one would also be an acceptable and recognised approach for dealing with any such issues on the phase two land.

Flood Risk

- 4.9 There are no comments from the Lead Local Flood Authority to the HELAA. However, the HELAA identifies that whilst there are bands of surface water flood

risk the majority of the site is free from any flood risk. The Environment Agency map for the area shows that the site falls within Flood Zone 1, which means that it is the lowest risk of flooding from watercourses. Notwithstanding this, the bands of surface water identified in the HELAA can be easily mitigated through the planning of the site and the Framework Plan accommodates space for SuDs features to be an integral part of the site's development.

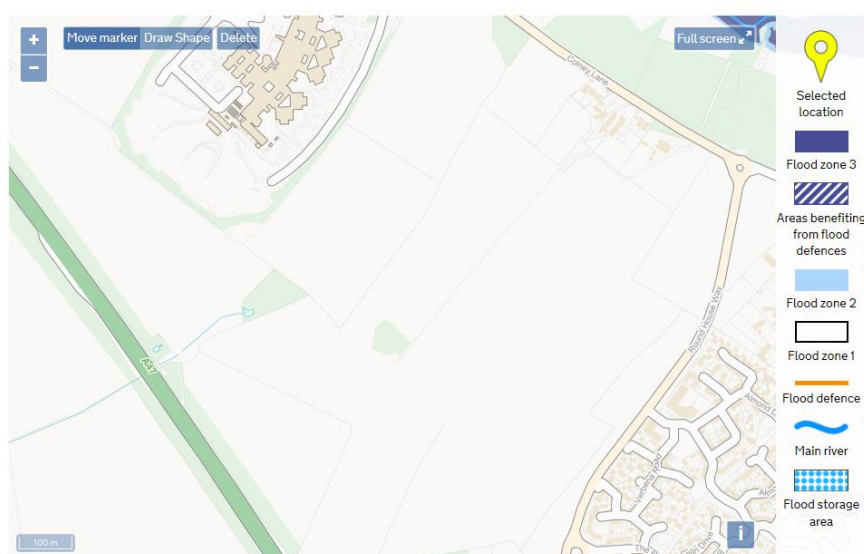


Figure3: Environment Agency Flood Risk map showing the Newfound Farm site

Significant Landscapes

- 4.10 Cringleford Parish Council object to allocation of the remainder of the site as it is constrained by the southern bypass protection zone and strategic gap between Hethersett and Cringleford. They also raise the issue of the high-tension electricity cables crossing the site on pylons. The Landscape Overview produced by CSA and the Framework Plan demonstrate how residential development with open space and associated infrastructure can be accommodated at the Site without giving rise to any significant landscape or visual effects. Moreover, the Framework Plan demonstrates how the site can successfully accommodate approximately 500 new homes whilst still maintaining the strategic gap between Hethersett and Cringleford. The Framework Plan also turns the constraint of the high-tension electricity cables crossing the site into an opportunity to accommodate public open space beneath the pylons.
- 4.11 As the proposed uplift area includes land within the existing settlement boundary of Cringleford the densification of the remainder of site GNLP0327 will not have a detrimental impact upon any significant landscape or reduce the strategic gap

between Hethersett and Cringleford. In fact, the development of the site will ensure that the landscaped area adjacent to the A47 will be maintained in perpetuity for use as a public amenity area for new and existing Cringleford residents. This will help to secure the retention of this part of the strategic gap and maintain a green buffer to the edge of Cringleford.

- 4.12 The site is not covered by any statutory or non-statutory designations for landscape character or quality and the Landscape Overview considers it to be of medium/low landscape quality and value and of medium sensitivity. This Landscape Overview concludes that the Site is generally well contained in views from the surrounding landscape due to the combination of topography, built form and existing vegetation and that views of the site are generally restricted to the near distance. The Framework Plan illustrates how existing vegetation and new planting will form an integral part of the development and will play an important role in minimising any localised visual impacts. The Framework Plan also illustrates how the Site could accommodate residential development at a density of 44dph without materially impacting upon the landscape character of the immediate area.

Transport and Roads

- 4.13 With growth already being successfully accommodated at Cringleford there are improvements to sustainable travel routes that will ensure that future and existing residents' reliance on the use of the private car will be reduced. This reduction in car dependency will also help reduce the negative impacts that unsustainable modes of travel have on climate change through increased greenhouse gas emissions. Moreover, through the promotion of walking, cycling and public transport residents will experience more positive interactions with each other and other residents of Cringleford and beyond than if they were reliant on private cars to meet their daily needs.
- 4.14 Our client supports the promotion of a greater shift towards non-car modes of travel in the Norwich urban area by focussing high density growth in locations with good access to sustainable transport networks. Cringleford is identified as a fringe parish that as part of the Norwich urban area is a location where higher densities should be promoted to help achieve this shift.
- 4.15 The Framework Plan that has been produced demonstrates how the development of the site will promote walking and cycling. The provision of a green corridor through the site towards the Norfolk and Norwich University Hospital will

encourage this as a safe route for pedestrians and cyclists to this major employment site. The Framework Plan also demonstrates the potential for the site to safeguard land for a pedestrian footbridge over the A47.

- 4.16 In addition to the improvements to sustainable travel networks the Travel Plans required for new residential developments in the village will help promote sustainable travel for residents as they move into new homes. All the forms of mitigation, which have been used to mitigate the impacts of the phase one scheme, can be extended to the phase two area to ensure that the impacts upon existing roads are mitigated through the promotion of sustainable modes of travel.

Other matters

- 4.17 The HELAA states that '*A significant part of the site (around 65%) already has planning consent.*' and considers that potential noise and pollution issues from proximity to the A47 would need to be considered. The additional work supplied with this representation has considered this and identified that there is an additional 11ha of net developable area of 11ha within site GNLP0307 that could be developed.
- 4.18 As already noted earlier, the phase one development produced a successful scheme at 44dph. This is in contrast to the 26dph that would be delivered if the uplift in the number of new homes were restricted to only 360 across the balance of site GNLP0307 and site GNLP0327. The net developable area that we have identified for the phase two of site GNLP0307 would deliver approximately 500 homes if it were developed at a density similar to that approved on phase one.
- 4.19 Whilst there is no evidence of statutory consultees carrying out any detailed assessment of noise or air quality BDW has taken this opportunity to clarify whether either of these matters would be a constraint to the development of the site and considers how they can be successfully mitigated.

Noise

- 4.20 As a result of the noise modelling that was been carried out for the Acoustic Assessment to support the discharge of condition 38 our client is confident that the majority of the new homes within the site will be subject to acceptable noise levels without the need of additional mitigation. To demonstrate this is the case the Technical Note produced by MLM confirms that the dwellings facing the A47

will provide mitigation for those dwellings and gardens behind them. In order to make acceptable living conditions for the dwellings facing the A47 additional mitigation will be required. This mitigation will be achieved either by improving the building envelope of these dwellings or the introduction of a noise barrier and/or bund within the landscaped area near to the A47. These forms of mitigation would be primarily in order to reduce night-time noise levels at first floor bedrooms. To make any bund and/or barrier most effective it would need to be as close to the A47 as possible, which can be achieved within the landscaped area to the southeast of the site. Given that any barrier and/or bund would be located within this landscaped area there is the potential for it to be softened with additional landscaping so that it maintains a rural edge to the village.

- 4.21 The strategy for the consented scheme on phase one also used the dwellings facing the A47 to act as mitigation for the dwellings and garden area behind them. These dwellings then require additional mitigation, which was considered acceptable. Therefore, by using this same approach for the phase two area the dwellings in the consented scheme would be protected from noise without the need for this additional mitigation.
- 4.22 In order to provide acceptable internal noise levels for the dwellings facing the A47 the most likely approach would be upgrading the building envelope and applying a strategy for the glazing and ventilation of these properties. The detailed design of these dwellings would still ensure that their private amenity areas were protected from noise and that the use of habitable rooms were not constrained by the issue of noise.
- 4.23 The use of the landscaped strip immediately adjacent to the A47 as a public space would benefit from the introduction of a noise barrier and/or bund to make it a more acceptable environment for residents' recreational use. Notwithstanding this, the Framework Plan also includes an area of public open space between the phase one and phase two. This would allow residents to have an alternative public open space to use, where noise levels would be significantly less than those adjacent to the A47 if the noise barrier or bund were not necessary to mitigate noise impacts for the dwellings facing the A47.
- 4.24 The Technical Note produced by MLM demonstrates that noise from the A47 is unlikely to be a significant constraint for the development of the phase two area of site GNLPO327. Moreover, the proposed strategy to mitigating the impact would be the same whether the site was to accommodate a proportion of the

proposed 360 uplift or the 500 homes that our client believes it can deliver. If as a result of further detailed noise work the preferred option is to provide a sensitively screened noise barrier and/or bund near to the A47 then this would have cost implications for the development. Therefore, by allocating additional homes on the site, and making the most efficient use of the land, it would also help to limit the impact upon viability of any potential strategies to mitigate the impact of noise.

Air Quality

- 4.25 BDW has instructed MLM to carry out a review of local authority monitoring data and Defra background data, which indicates that the existing concentrations of NO₂, PM₁₀ and PM_{2.5} are 'well below' the relevant NAQOs. In future years, air quality is anticipated to improve further due to improvements in vehicle emissions and it is therefore expected that the future air quality at the site would comply with all relevant NAQOs.
- 4.26 The Technical Note on air quality concludes that future residents and users of the phase two site will not be exposed to poor air quality and mitigation measures to reduce air pollution exposure, such as mechanical ventilation, are not considered to be necessary.

Ecology

- 4.27 Whilst not specifically raised as an issue in the HELAA a Preliminary Ecological Appraisal (PEA) of the site has been carried out to identify any potential ecological constraints to the development of the phase two site.
- 4.28 As part of the PEA, a desk study and extended Phase 1 Habitat survey of the site were undertaken in February 2020. As the site predominantly comprises arable fields the greatest ecological interest within the site is found within the hedgerows and a small area of semi-improved grassland between the arable fields. The retention, protection and enhancement of the ecological features is to be prioritised within the development proposals and the Framework Plan demonstrates how this can be achieved.

Primary School Site

- 4.29 The need to safeguard an area of land for a school is acknowledged and applications refs. 2013/1793 2018/1389 already accommodate a 1ha site for a new primary school. The Framework Plan shows a further 1ha to accommodate a

logical expansion of the primary school site. Whilst the HELAA identifies that the additional growth planned for Cringleford means that the school site may need to increase in size, with a consequent reduction in the number of additional homes that could be accommodated on the GNLP0327 site, it also acknowledges that an equivalent alternative provision could be agreed with the education authority.

- 4.30 Our client does not believe that any additional land will be required for the expansion of the primary school over and above the 2ha that has been safeguarded. However, if additional capacity were required to accommodate the uplift in numbers on their site then BDW would be willing to have discussions with the education authority to agree how best to deliver the additional capacity.

5. CONCLUSION

- 5.1 BDW welcomes the proposal to accommodate further growth at Cringleford and supports the principle of an uplift in numbers for the Newfound Farm allocation. However, they disagree with the high-level assessment that only 35% of the site is suitable for further development or that the uplift numbers should be restricted to 360 homes for both the remainder of site GNLP0327 and site GNLP0327. Moreover, the arbitrary limit on the delivery period for new homes in Cringleford before 2026 has the potential to limit the supply of new homes.
- 5.2 The development of phase two of Newfound Farm has the potential to deliver 500 dwellings at a density that is accepted within the Norwich urban area, of which Cringleford parish is part of. The development of the phase two land would be the only way that a vehicular link from the consented phase one scheme to the roundabout on Round House Way could be achieved. Whilst we don't believe that this link is essential for the phase two land to come forward, should this link be secured then there would also be the potential to deliver a pedestrian crossing point across Round House Way to further encourage pedestrian and cycle connectivity with the rest of Cringleford.
- 5.3 Our client will be opening two sales outlets under their different brands of Barratt and David Wilson Homes. This will result in an increase in the delivery of new homes on their Cringleford site. There will also be significant cost and time savings by the continuation of development from the consented scheme at the Newfound Farm site. The Councils should only be allocating housing sites where a reasonable prospect of delivery and there are doubts about the delivery strategy that is proposed in the emerging Local Plan, and whether it will deliver the most sustainable form of development. By increasing the proposed uplift in numbers

for the Cringleford allocation the Councils will be providing greater certainty over the delivery of new homes compared to other allocations in the Greater Norwich Local Plan, which includes a reliance on allocation through the South Norfolk Village Clusters Housing Site Allocations document.

- 5.4 Draft Policy 2 of the emerging Greater Norwich Local Plan recognises the importance of ensuring the effective use of land in accordance with paragraphs 122 and 123 of the National Planning Policy Framework 2019. This document and the supporting reports and plan demonstrate that any constraints to the densification of the phase two land can be overcome and that it would be the most effective use of the land. The densification of the site would also deliver benefits to Cringleford and the wider Greater Norwich area through the delivery of new homes in this sustainable location, further enhancements to highways and social infrastructure and additional CIL payments to South Norfolk Council and Cringleford Parish Council. Therefore, the Councils need to ensure that the development of land at Cringleford accords with the Sustainable Growth Strategy for the Greater Norwich area by following the accepted approach to densities on the consented phase one development.
- 5.5 To overcome this objection, BDW request that the preferred allocation be amended to reflect the delivery of an additional 500 homes plus land for a primary school on the remainder of the GNLP0307 site that is not covered by the consented scheme.