

Land Between Fir Covert Road & Reepham Road  
M Scott Properties Ltd  
Iain Hill  
March 2021



# GREATER NORWICH LOCAL PLAN REGULATION 19 (GNLP0337R) REPRESENTATIONS ON BEHALF OF M SCOTT PROPERTIES LTD



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INDICATIVE MASTERPLAN PREPARED BY BROWN & CO

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DRAFT STATEMENT OF COMMON GROUND

## 1.0 Responses to Draft Greater Norwich Local Plan – Part 2 – The Sites

- 1.1 On behalf of M Scott Properties Ltd (Scott Properties), we strongly support the allocation of GNLP0337R (the Site), Land between Fir Covert Road & Reepham Road, Taverham.
- 1.2 As demonstrated during the various Regulation 18 consultations ([GNLP0337R](#)) the site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2038. In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the proposed allocation represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and, subject to clarification on matters relating to the GNLP's Viability Assessment, is viable.
- 1.3 The continued suitability of the site is detailed below. In considering the suitability of the site regard has been given to the specific requirements of Policy GNLP0337R, as well as additional technical work, and discussions with key stakeholders, including extensive pre-application discussions with the Greater Norwich Local Plan Team, Broadland District Council, Norfolk County Council (Highways and Education), Local Councillors and Taverham Parish Council, that have taken place since the Regulation 18 (c) consultation. Weekly meetings are held with Broadland District Council with focused workshops with key stakeholders taking place approximately every 4-6 weeks to discuss key matters that will influence the preparation of a planning application, such as highways, landscape and design.
- 1.4 However, whilst the principle of the policy is considered sound, in accordance with the tests set out in paragraph 35 of the NPPF, the detailed wording is not sound, as elements are neither effective or justified. Minor alterations to Policy GNLP0132 are therefore sought, to ensure its soundness.

### Confirmation of Delivery

#### Suitable

- 1.5 Taverham is identified in the draft Greater Norwich Local Plan as being within the Urban Fringe. Norwich and the Urban Fringe are identified as the location to accommodate 66% of the housing growth during the period to 2038 on the basis that it is the most sustainable location within the Greater Norwich area and is the focus for significant economic growth. Norwich is the catalyst for economic growth in the area and provides a range of amenities, services and infrastructure to support sustainable housing.
- 1.6 Within the Urban Fringe, Taverham represents a highly sustainable location with good access to Norwich, that has been significantly enhanced by the delivery of the Broadland Northway. The buffer created by the Broadland Northway presents an opportunity for a logical strategic urban extension to the settlement of Taverham at a size and scale that can, whilst being proportionate to the scale of the settlement, accommodate a significant quantum of the infrastructure and housing required in the Greater Norwich Area over the next two decades.

- 1.7 Accordingly, Taverham provides a wholly suitable location for strategic growth i.e. over 1,000 units, which can provide a wide range of infrastructure improvements, such as schools, employment, health centres and green infrastructure, which will provide benefits to both existing and future residents.
- 1.8 In addition, Taverham already benefits from a variety of amenities including a pub, a convenience store, takeaways, petrol filling station and a garden centre. In addition, the area is within close proximity of the amenities provided within Thorpe Marriott and Drayton. Nightingale and Ghost Hill Infant schools are located in close proximity of the site, as are Taverham Junior and High Schools. A private school (Langley Preparatory School at Taverham Hall) is located nearby.
- 1.9 Turning to the site, it is not subject to any landscape, nature or heritage designations, and will have minimal impact on the natural, built or historic environment. It is located immediately adjacent to the settlement boundary, and represents a logical extension to the settlement, occupying the space between the edge of the modern development along Kingswood Avenue and the newly constructed Broadland Northway, which provides a natural boundary to the north. There are no designated or un-designated heritage assets in the vicinity of the site; the closest Listed Buildings are some 1.5km away from the site.
- 1.10 The site is well contained within the landscape, and will have minimal visual impact. The bunding along the southern side of the Broadland Northway will minimise views from the north, and the existing development along Fir Covert Road will perform the same function from the west. The existing tree belt which runs along the southern boundary will screen the development to a significant degree from the south, and the existing tree belt which runs north-south will screen some views from the east.
- 1.11 Development in this location, which is not particularly sensitive in terms of the natural, built and historic environment, will assist in protecting other, more sensitive locations, from development pressure.
- 1.12 Accordingly, it is evident that the identification of Taverham, and specifically land covered by Policy GNLP0337, as a location to accommodate a minimum of 1,400 units, is fully justified.

#### Density and Quantum of Development

- 1.13 The preferred allocation identifies the site as being suitable to accommodate at least 1,400 homes, together with associated public open space, new primary school and local medical centre.
- 1.14 Based on the minimum target of 1,400 dwellings and the preferred allocation site area of approximately 78ha (*not 81.69ha as detailed in the draft policy*), the density of the development equates to approximately 18 dwellings per gross hectare. As detailed on the Indicative Masterplan submitted in support of this representation (See Appendix 1), the site has the potential to provide a mix of densities, ranging from 22 to 35 dwellings per net hectare, thereby achieving the minimum of 25 dwellings per net hectare sought by the draft GNLP. On this basis, it is evident that whilst the site can accommodate the minimum number of units identified by the proposed allocation, it has the potential to accommodate more units if required.



### Layout (Masterplan)

- 1.15 The Indicative Masterplan attached as Appendix 1 demonstrates how the specific requirements of draft Policy GNLP0337R can be accommodated on the site. More specifically, the Masterplan outlines how the following uses are provided on site:
- Land for a primary school (2ha); the location and area of land required for the primary school has been agreed in discussions with Norfolk County Council Education (see Area 2 on the Masterplan). As required by the draft policy, land for the primary school is located toward the centre of the site.
  - Land safeguarded for a medical care facility; land for the medical centre is, as required by the draft policy, located toward the centre of the site (see Area 4 on the Masterplan).
  - Provision of on-site recreation; the masterplan details how the site provides approximately 24ha of open space, including allotments, neighbourhood greens, connectivity with Marriott's Way and formal sports provision, including a MUGA and community pitches. The provision of open space is in excess of the requirements of the Broadland District Council's Supplementary Planning Document on Recreational Provision in Residential Development and Policy 3 of the draft Greater Norwich Local Plan, and has been agreed through consultation workshops with Officers, Taverham Parish Council and other stakeholders, including Sport England. The Masterplan details how, in accordance with the requirements of Policy GNLP0337R, open space can be provided on site to encourage healthy lifestyles. A key element of this is the creation of a link between the site and Marriott's Way.
- 1.16 On this basis, it is evident that, as per the submitted masterplan, the site is suitable in terms of meeting the various requirements of the draft site policy in relation to use(s).

### Access, Transport and Roads

- 1.17 Scott Properties has been working in conjunction with Norfolk County Council Highways to ensure the local road infrastructure has the capacity to manage the increase in demand and that suitable access points can be provided.
- 1.18 As a result of this work, and in accordance with the requirements of the draft Policy, potential arrangements for access from both Reepham Road and Fir Covert Road, including off-site highway works, have been identified in consultation with Norfolk County Council Highways. A link road will connect the new junction on both Fir Covert Road and Reepham Road. The detailed design of the link road, including the crossing of Marriott's Way, has been agreed, in principle, following discussions with Norfolk County Council Highways and Broadland District Council Officers. Further details on proposed access arrangements is contained within Appendix 2.
- 1.19 The Indicative Masterplan also details how enhanced pedestrian and cycle links to the existing communities of Felsham Way, Ganners Hill, Breck Farm Lane and Kingswood Avenue can be facilitated by the development. In addition, as detailed above, connections can be made with Marriott's Way which in turn provides ease of access to the wider national cycle network.
- 1.20 Accordingly, as the masterplan demonstrates, the requirements of draft Policy GNLP0337 can be accommodated within the site.

## Landscaping

- 1.21 The Site is, as detailed on the masterplan, capable of providing a comprehensive landscape strategy, which will create opportunities for ecological and biodiversity enhancements. This will include:
- Enhancements to the landscape buffer adjacent to the A1270 (Broadland Northway) in order to ensure residential amenity is protected;
  - A central green 'park walkway' formed of the existing mature and defined Marriott's Way;
  - A substantial green edge around the site peripheries, created using woodland and meadow environments;
  - Retention of existing trees and hedgerows where possible, with suitable mitigation if removal is required; and
  - Safeguarding of landscaping / buffer provided by Marriott's Way.
- 1.22 Accordingly, as the Indicative Masterplan demonstrates, the requirements of draft Policy GNLPO337 can be met on the site. However, notwithstanding the foregoing, as drafted, the policy requires 'provision of a significant landscape buffer adjacent to the A1270 and adequate noise mitigation measures to protect residential amenity'. The requirement for a 'significant' buffer is not based on evidence relating to required mitigation. Accordingly, it is requested that, in order to ensure that the policy is justified and based on proportionate evidence and, therefore, sound, that reference to significant is removed and replaced with appropriate.

## Other Matters

- 1.23 As detailed above, a substantial amount of technical work has been undertaken to inform the promotion of the site and the preparation of the illustrative masterplan. The technical work, which was submitted at the Regulation 18 (C) stage includes:
- Phase 1 & 2 Site Investigation Reports by Geosphere Environmental Ltd & Norfolk Partnership Laboratories;
  - Surface Water & Engineering Strategy prepared by Cannon Consulting Engineers;
  - Aboricultural Survey prepared by Geosphere Environmental Ltd;
  - Preliminary Ecology Appraisal prepared by Geosphere Environmental Ltd;
  - Great Crested Newt Survey prepared by Geosphere Environmental Ltd;
  - Ecology Survey prepared by Geosphere Environmental Ltd;
  - Bat Foraging Survey prepared by Geosphere Environmental Ltd;
  - Winter & Breeding Survey prepared by Geosphere Environmental Ltd;
  - Heritage Statement prepared by Archaeological Solutions Ltd;
  - Archaeological Statement prepared by Archaeological Solutions Ltd;
  - Habitat Regulations Assessment prepared by Geosphere Environmental Ltd;
  - Foul Water Strategy & Engineering prepared by ASD Engineering;
  - Preliminary Air Quality Appraisal prepared by Mayor Brown Ltd; and

- Preliminary Acoustic Appraisal prepared by Mayor Brown Ltd.

- 1.24 In addition, further technical information, including a Flood Risk Assessment and Transport Assessment, is being prepared to inform the preparation of a planning application.
- 1.25 It is, based on the foregoing, together with the technical information submitted, evident that the site is capable of meeting the requirements of draft Policy GNLP0337.

### Availability & Achievable

- 1.26 The site is controlled, in its entirety, by Scott Properties. More specifically, Scott Properties are promoting the land on behalf of two landowners, with the entire area that is subject to Policy GNLP0337 being under either promotion or option agreements.
- 1.27 Scott Properties are keen to commence delivery on site at the earliest available opportunity. This is detailed by the substantial amount of work undertaken to date in relation to the preparation of a planning application.
- 1.28 As detailed above, discussions with key stakeholders, notably Broadland District Council, Norfolk County Council (Highways, Education, LLFA), and Taverham Parish Council regarding the preparation of a planning application have been ongoing for in excess of 18 months. Formal pre-application discussions commenced in June 2020 and continue on a weekly basis. The current intention is to submit a planning application in summer 2021; coinciding with the submission of the Local Plan to the Secretary of State for examination.
- 1.29 In terms of the format of the application, the intention is to submit a hybrid planning application covering the entire site. It is, at this moment in time, proposed that the detailed element of the scheme will constitute Phase 1 and 2, with the remainder of the proposed development submitted in outline.
- 1.30 The format of the application together with the phased delivery of the site, enables Scott Properties to package the development into parcels of land. Discussions are ongoing with a number of small and medium enterprise (SME) housebuilders, as well as national housebuilders, in respect of the development of the parcels of land. It is envisaged that this will be finalised before the submission of a planning application.
- 1.31 Based on current market conditions, it is envisaged that the development of the site will be completed within the plan period. More specifically, assuming planning permission is received in 2022, it will enable construction to start on site on 2023. Based on these dates, the table below shows the anticipated delivery rate of the site:

	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
Units	30	100	150	150	150	150	150	150	150	150	120
Total	30	130	280	430	580	730	880	1030	1180	1330	1450

## **Viable**

- 1.32 We are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no significant factors that we are aware of, at this moment in time, that could prevent the delivery of the site.
- 1.33 However, this statement is made in the context of paragraph 57 Greater Norwich Local Plan Viability Study (2020), which states that independent development appraisals will be undertaken to examine the viability of the strategic sites (of which this is one), given that these sites will be impacted by strategic infrastructure costs over and above the usual development costs.

## **Statement of Common Ground**

- 1.34 A draft Statement of Common Ground (SoCG) has been prepared by Scott Properties. The SoCG confirms that the site is, in principle, compliant with relevant planning considerations and deliverable.
- 1.35 A copy of the draft Statement of Common Ground is attached as Appendix 3.

## **Summary**

- 1.36 As outlined above, the site is suitable, available and, in principle, viable, and is therefore developable. Residential development in this location, together with associated community facilities, would represent sustainable development, as defined within the National Planning Policy Framework. Taverham, as part of the Urban Fringe, is a highly sustainable location, and a preferred location for growth, and the foregoing text demonstrates that this specific site is a suitable location for development in all respects.
- 1.37 As has been demonstrated, the proposed allocation is suitable, available, achievable and viable, and is deliverable within the plan period. As previously recognised, there are no constraints which would affect the suitability of the site for residential development. The foregoing text demonstrates that this site is a suitable location for development and is capable of meeting the requirements of draft Policy GNLP0337R. Accordingly, Scott Properties fully supports, in principle, the allocation of the site under Policy GNLP0337R for residential development. However, as detailed above, to ensure Policy GNLP0337R is sound, a number of minor alterations are suggested. These are detailed below.



## Revised Policy Wording

### POLICY GNLP0337

Land between Fir Covert Road and Reepham Road, Taverham (~~81.69ha~~ **78.36 ha**) is allocated for residential development. The site is likely to accommodate at least 1,400 homes including specialist care housing and older persons housing units, associated public open space, local centre, primary school and local medical centre.

More homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints.

The development will be expected to address the following specific matters:

1. Preparation of a masterplan to guide the development, submitted as part of the application for planning permission.
2. Provision of on-site recreation to encourage healthy lifestyles, in accordance with relevant policies.
3. 2h safeguarded for provision primary school.
4. Land safeguarded for provision of medical care facility.
5. A local centre at the heart of the development, easily accessible to surrounding residential areas.

The masterplan should demonstrate:

6. Detailed arrangement for access (vehicular and pedestrian) such as from Reepham Road and Fir Covert Road, pedestrian/cycle links at Felsham Way, Ganners Hill, Breck Farm Lane, and Kingswood Avenue.
7. The distribution of land-uses across the site. The School and medical care facility should be centrally located in an easily accessible location on the site.
8. Off-site improvements to the highway network which may include provision of new roundabout on Reepham Road, and Fir Covert Road including proposed link road.
9. No adverse effect on the operation of the water treatment works.
10. Safeguarding landscape enhancements and buffer of the Marriott's Way.
11. The approach to phasing of development across the site.
12. Provision of ~~significant~~ **an appropriate** landscape buffer adjacent to A1270 and adequate noise mitigation measures to protect residential amenity.
13. Inclusion of pollution control techniques to ensure that development does not lead to pollution of the water environment as the site falls within source protection zone 3.
14. Submission of an Arboricultural Impact Assessment (AIA) to protect or to mitigate any harm to trees on site.
15. Submission of ecological assessment to identify key ecological networks and habitats to be preserved and enhanced through the development.
16. Mitigation of surface water flooding onsite.
17. Approach to infrastructure delivery on and off-site.
18. Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is underlain by safeguarded minerals resource. The benefits of extracting the minerals, if feasible, will be taken into consideration.

### Key

Strikethrough = delete text

**Red** = revised text

**APPENDIX 1**  
**INDICATIVE MASTERPLAN PREPARED BY**  
**BROWN & CO**

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Issue Status			
This drawing is copyright. Only figured dimensions to be worked to.			
Revision	Drawn	Check	Date



client	Scott Properties		
project	Marriott's Park, Taverham,		
drawing	WIP Framework Plan		
date	March 2021	scale	1:2500 @ A1
drawn by	BB	checked by	JSB



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# APPENDIX 2 HIGHWAY PLANS

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**Drawing Notes**  
 All levels are in metres and relate to ordnance survey datum.  
 All dimensions are in metres unless otherwise stated.  
 All works are to be undertaken in accordance with the specification for the works. As referenced in the specification for the works, Volume 1 of the Manual for Contract Documents for Highway Works is applicable for the highway works and the Civil Engineering Specification for the Water Industry is applicable to the drainage works. Where a clause directly references these documents it shall be followed by the abbreviation s/w or w/w as applicable.  
 This drawing is for information and tender purposes only. This drawing is not to be used for drainage construction until approved by the relevant authority.

**Site Control**  
 All levels and coordinates are in metres and relate to the topographical survey drawings.  
 1394/HR/001-009 (September 2019) by ASD  
 ASD Survey Completed April 2019, BEB Survey Completed January 2017 (Revised May 2019)



**PRELIMINARY DRAWING FOR DISCUSSION ONLY**  
**DRAFT**

Scale 1/1250  
 0m 10.0m 20.0m 30.0m 40.0m 50.0m 60.0m

**CHAS** CONTRACTORS HEALTH & SAFETY ACCREDITED SCHEME ACCREDITED CONTRACTOR

Any drainage or highway work cannot be prior to a technical approval from the relevant sewerage undertaker and/or the relevant highway authority shall be at the risk of the contractor and/or client.

Rev.	Revisions	Date
1	Original Drawing	04.03.21

**SCOTT**  
PROPERTY GROUP

Client: **MARRIOTT'S PARK, TAVERHAM**  
NORWICH

Job Title: **SPINE ROAD**  
GENERAL ARRANGEMENT - OVERVIEW

Drawing Title: **SPINE ROAD**  
GENERAL ARRANGEMENT - OVERVIEW

Drawing Status: Preliminary  
 Drawn By: SC Checked By:  
 Scale: 1/1250 (A3) Date: 04 MARCH 2021

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 Dwg No: 1394/HWY/003 Rev: -



# APPENDIX 3

## DRAFT STATEMENT OF COMMON GROUND

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Greater Norwich Local Plan (GNLP) Site Allocation Statement of  
Common Ground (SoCG)

Between

Broadland District Council, South Norfolk Council,  
Norwich City Council, Norfolk County Council

And

Site Reference:

Site Address:

Proposed Development:

## Introduction

The Greater Norwich authorities want to ensure sites allocated in the GNLP are achievable, where possible wholly compliant with all relevant planning considerations, and deliverable in a timely way. It is with that purpose in mind that landowners, agents and developers with a site likely to be included in the GNLP are being asked to agree a Site Allocation Statement of Common Ground (SoCG). Each SoCG will be available to the inspector appointed to examine the GNLP so that they can satisfy themselves of the commitment to deliver each site and to meeting local plan requirements.

The GNLP Team wants the process of agreeing a SoCG to be a frank but collaborative process for all parties concerned. In the case of most sites, this process is likely to commence in Autumn 2020 and conclude in 2021 as the Regulation 19 submission draft of the GNLP is finalised. For other sites, for example where development may entail abnormal costs, discussions may continue in to 2022, as the GNLP reaches its examination in public.

This SoCG template has been designed with consideration to the possibility of future planning reforms. It is deliberately straightforward and only asks the questions that any landowner, agent, or developer would naturally ask themselves. The template only requires 700 words of written response to complete, but its importance should not be underestimated.

The GNLP Team regards the viability and timely delivery of development as a high priority. Therefore, the working assumption is without a SoCG a site is unlikely to be allocated.

## General Guidance

When completing the SoCG template please be precise. For example, in the description of development proposed, use the appropriate GNLP four-digit reference code, as well as giving a site address (including a postcode or eastings/northings reference).

Signatories to the SoCG should include all relevant parties with a role in bringing forward the proposed development. This should include all landowners, agents, developers, and possibly end-users of the development (if known).



## Greater Norwich Local Plan (GNLP)

The SoCG template contains a series of free-text questions that are designed to be answered within 100 words. If for whatever reason answering one or more of these questions is not possible or proves difficult site promoters are welcome to seek guidance from the GNLP Team. This may lead to completing the SoCG with a description of what issues remain for resolution at a future date.

Completing this SoCG template should be done with reference to the draft policies associated to the GNLP. Notable examples that will likely affect the form of development on site and its construction costs include:

- Provision of green infrastructure and suitable alternative green space (known as SANGS) under Policy 2 Sustainable Development and Policy 3 Environmental Protection and Enhancement; and,
- Obligations for affordable housing under Policy 5 Homes.

It should also be noted that completing a SoCG is a separate exercise from other data requests made by the Greater Norwich Local Plan Team, or the Greater Norwich authorities. For example, this is a separate exercise to the Five-year Housing Land Supply statements that are requested for the Annual Monitoring Report.

### **Commercially Sensitive or Other Confidential Information**

By submitting a SoCG you are consenting to the details about you and your site/s being published and available for public viewing. Any information that you consider to be confidential or commercially sensitive and would not want published should be excluded from this form.

By signing you are agreeing to the information provided being to the best available knowledge accurate, and that it can be used in preparation of the Greater Norwich Local Plan (GNLP) – and used in evidence at the public examination of the GNLP.

1. Please provide a commentary on the site's progress in respect to the three tests of being available, suitable, and deliverable.

*[Approximately 100 words recommended]*

2. Please provide a commentary on any land ownership constraints that may affect or delay development of the site.

*[Approximately 100 words recommended]*

3. Please provide a commentary on progress to making a planning application – such as pre-application advice, or if planning permission exists on all or part of the site.

*[Approximately 100 words recommended]*

4. Please provide a commentary on the site's delivery, for example a predicted start-on-site, the annual rate of delivery, and the development's likely completion date.

*[Approximately 100 words recommended]*

5. Please provide a commentary on engagement held with statutory bodies and if any agreements have been made.

*[Approximately 100 words recommended]*

6. Please provide a commentary on any known technical constraints about the site – such as but not limited to highways, heritage, or ecology.

*[Approximately 100 words recommended]*

7. Please provide a commentary on community benefits the site will offer – such as but not limited to land and/or buildings for education and community provision.

*[Approximately 100 words recommended]*

# Greater Norwich Local Plan (GNLP)

Signed on Behalf of the Greater Norwich Development Partnership	Date
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Signed on behalf of	Date
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**NORWICH**  
City Council



Working with



**Norfolk** County Council





BIDWELLS