

Examination Library Document Reference EH011(e) (i)

Matter 5: Places and Housing Sites, Issue 5.6 – North Walsham
ESCO Developments Ltd, Flagship Housing Developments Ltd
and Lovell Partnerships Ltd



NORTH NORFOLK LOCAL PLAN EXAMINATION HEARING STATEMENT

Quality Assurance



Site name:	North Norfolk Local Plan Examination
Client name:	ESCO Developments Ltd, Flagship Housing Developments Ltd and Lovell Partnerships Ltd
Type of report:	Hearing Statement (Matter 5)
Prepared by:	Sarah Hornbrook MA (Cantab) MSc MRTPI
Signed	
Date	4 January 2024
Reviewed by:	Iain Hill MSc DipTP MRTPI
Signed	
Date	4 January 2024



Table of Contents

1.0	Introduction	1
2.0	Matter 5, Issue 5.6 – North Walsham	2

Appendix 1

CONSORTIUM-CONTROLLED LAND

Appendix 2

NCC POSITION STATEMENT ON POLICY NW62/A – DECEMBER 2023

Appendix 3

NCC POSITION STATEMENT ON CURRENT STATUS OF B1150 THROUGH COLTISHALL – DECEMBER 2023

Appendix 4

PROPOSED POLICY WORDING

Appendix 5

ANGLIAN WATER COMMENTS ON DRAFT DEVELOPMENT BRIEF

Appendix 6

NCC COMMENTS ON DRAFT DEVELOPMENT BRIEF

Appendix 7

HISTORIC ENGLAND COMMENTS ON DRAFT DEVELOPMENT BRIEF

1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Bidwells LLP on behalf of ESCO Developments Ltd, Flagship Housing Developments Ltd and Lovell Partnerships Ltd (hereafter 'ESCO', 'Flagship', 'Lovell' or collectively, 'the Consortium') in support of representations made to the North Norfolk Local Plan. By way of background, the Consortium are promoting land North West of North Walsham (Site NW62/A) for residential-led development of approximately 1,800 dwellings, 7ha of employment land, community facilities and associated infrastructure.
- 1.2 This Statement provides the Consortium's response to Matter 5 (Places and Housing Sites), Issue F5.6 (North Walsham) of the Inspectors' Matters Issues and Questions, November 2023 [Document EH0003].
- 1.3 The Consortium continues to work closely with North Norfolk District Council (NNDC), Norfolk County Council (NCC) and Broadland District Council (BDC) and intends to provide Statements of Common Ground with these parties, in advance of the relevant Hearing Sessions.
- 1.4 In addition, work on a Development Brief [EX010] for the site is ongoing.

2.0 Matter 5, Issue 5.6 – North Walsham

Question 5.6.2 - Are the housing allocations for North Walsham the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

- 2.1 To meet the soundness requirements of the NPPF, set out in paragraph 35, it is not necessary for the allocations to be “the most appropriate” (our emphasis added), rather it is necessary to demonstrate that they are “an appropriate” strategy, taking into account the reasonable alternatives and based on proportionate evidence.
- 2.2 In this regard, it is considered that allocation of site NW62/A is an appropriate strategy, when considered against the reasonable alternatives, including the alternative sites which are set out in document D3, “Site Assessment Booklet (Regulation 19): North Walsham”.
- 2.3 Paragraph 74 of the NPPF recognises that, “*The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).*” In order to meet the District’s projected housing needs, NNDC have followed this guidance and sought a suitable location for larger scale development in the form of a significant extension to an existing settlement. Large parts of the District are constrained by environmental and landscape designations, including the Norfolk Coast AONB and/or proximity to the Norfolk Broads National Park, and internationally designated nature sites. North Walsham is not impacted in this way, and as the largest town in the District is an eminently suitable location for large scale growth. Consequently, it follows that it is entirely appropriate to seek to allocate a large site adjacent to the town, and this would have the added benefit that it can deliver significantly greater infrastructure benefits compared to a series of smaller sites, including a road linking the B1150 Norwich Road with the A149 Cromer Road, land for a primary school, a local centre, and significant open space.
- 2.4 Development to the north and east of the town is constrained by poor highway network connections, and the presence of the North Walsham and Dilham Canal and its associated flood plain. This is reflected in the RAG Assessments within document D3 for many of the alternative sites located to the north and east of the town, which are scored ‘red’ for both access and connectivity. In addition, historic expansion of the town has tended to be focussed to the north and east, meaning that further expansion in these directions would result in development that is some distance from the town centre and railway station. For these reasons, if a large quantum of housing is to be delivered in North Walsham, it is appropriate for any significant extension to the town to be located to the west and south.
- 2.5 It is acknowledged that within the RAG Assessment in document D3 the site scores more ‘amber’ ratings than some other alternative sites, but amber simply signifies a potential constraint that is capable of being mitigated, and the site does not score any ‘red’ ratings which would indicate an issue that cannot be mitigated. These amber ratings must be weighed in the wider balance of the scale of development and benefits that site NW62/A can deliver, and it has been demonstrated that all of the amber issues can be satisfactorily mitigated (see response to Question 5.6.4(d)).

- 2.6 There are no other sites available that could accommodate the quantum of development proposed with fewer impacts.
- 2.7 The suitability of the site for the development proposed has been comprehensively demonstrated through the Council's Site Assessment process [D3], the Consortium's Regulation 19 Representations [A5.8], and the significant technical work which underpins the Draft Development Brief [EX010], and the Consortium's response to Questions 5.6.4(d) demonstrates that the impacts and effects of the development have been properly taken into account.
- 2.8 In light of the above, it is clear that the proposed allocation of site NW62/A is an entirely appropriate strategy, taking into account the reasonable alternatives, and having regard to site constraints, infrastructure requirements and potential impacts. Accordingly, the allocation of the site is justified in accordance with the definition set out in the NPPF.

Question 5.6.4(a) - Has the site been allocated previously or is it a new allocation?

2.10 The site has not been allocated previously and is a new allocation.

Question 5.6.4(b) - Does the site have planning permission and/or are there current applications under consideration? If so please list.

- 2.11 The site does not have planning permission for the development envisaged within the allocation. However, the Consortium are in the process of preparing an outline application, which they are intending to submit in Q2 2024, and will cover the 94 hectares (ha) of the allocation that the Consortium have an Option Agreement over (refer to Appendix 1 for extent of Consortium-controlled land).
- 2.12 To facilitate this, the Consortium have been working alongside NNDC and other key stakeholders to prepare a Development Brief for the whole allocation, building on the previous work undertaken by the Council, which culminated in a public consultation in May 2021 on what were described as “high level aims and objectives for the development of the site including an overall vision for the development and an illustrative Master Plan.”
- 2.13 On 7th August 2023, the Council’s Planning Policy & Built Heritage Working Party unanimously agreed to hold a period of public consultation on a Draft Development Brief [EX010] prepared by Bidwells on behalf of the Consortium, in collaboration with NNDC.
- 2.14 A virtual public exhibition was hosted from Monday 4th September until Sunday 1st October 2023, through a bespoke project website: www.northwalshamwest.consultationonline.co.uk. A Freephone information line and a feedback email address were also made available throughout the course of the preapplication consultation, for interested parties to receive further information and to enable people to provide their feedback to the project team.
- 2.15 In addition, two in-person exhibitions were held at local venues in the town – on Wednesday 13th September at North Walsham Community Centre and Tuesday 19th September at North Walsham Town Football Club.
- 2.16 Comments were also sought from a wide range of statutory consultees.
- 2.17 Following feedback from BDC, a further public consultation on the specific off-site highways mitigation measures proposed within Coltishall was held. A public exhibition was held at Coltishall Village Hall on Wednesday 6th December, and the project website was updated to include the exhibition boards. As was the case for the previous consultation, a Freephone information line and a feedback email address were also made available.
- 2.18 Feedback received during this period of consultation, has been analysed and a number of revisions to the Development Brief are proposed to address matters raised. To demonstrate the progress made on the preparation of the Development Brief, it is understood that NNDC intend to take a revised version of the Development Brief, which includes a summary of how comments made during the consultation events, have been addressed to the January meeting of the Council’s Planning Policy & Built Heritage Working Party... NNDC have confirmed that the revised Development Brief will be added to the Local Plan Examination Library.
- 2.19 In addition to work on the Development Brief, the Consortium have begun discussions with NNDC on a Planning Performance Agreement, which it is hoped will be in place early in 2024. It is also anticipated that formal pre-application discussions will commence in early 2024.

2.20

It has been agreed with NNDC that the development will comprise EIA development, and therefore a formal Screening Opinion will not be sought. Instead, the Consortium are proceeding straight to Scoping Stage, and intend to submit a formal EIA Scoping Request early in 2024.

Question 5.6.4(c) - Are any modifications suggested to the policy or text, or the site boundaries? If so, why, and are they justified or required for effectiveness?

- 2.22 A number of modifications to the policy and supporting text are suggested; these comprise a combination of changes sought by NNDC as 'additional modifications', some of which the Consortium support and some of which they oppose, and further modifications requested by the Consortium.
- 2.23 The Consortium is working with NNDC, NCC and BDC to prepare a revised policy wording that all parties agree to, and it is hoped that this will be reflected in Statements of Common Ground that will be submitted to the Inspector prior to the relevant Hearing Sessions taking place. However, in the interim, the Consortium's position is set out below.

Policy Wording

- 2.24 Taking each paragraph/bullet point of the policy wording in turn, our comments are set out below. The base text in black is the submitted policy wording as amended by the 'additional modifications' suggested by NNDC. Consortium suggested omissions are shown in ~~red struckthrough text~~, and Consortium suggested additions are shown in blue. A 'clean' copy of the proposed policy wording is provided in Appendix 4.
- 2.25 Within the introductory wording of the policy, the requirement for the new road to link to the industrial estate is not justified and should be omitted to ensure soundness, as set out in more detail in response to question 5.6.4(e). Evidence demonstrates that this link is not required to mitigate the impacts of the proposed development, and this has been confirmed by the Local Highway Authority in their Draft Position Statement (Appendix 2).

Land West of North Walsham

Land to the west of North Walsham to provide a mixed-use sustainable urban extension amounting to 108 hectares, as defined on the Policies Map, is allocated for approximately 1,800 dwellings, 7 hectares of employment land, green infrastructure, community facilities and a road linking Norwich Road and Cromer Road ~~and the industrial estate~~.

Planning permission will be granted subject to compliance with the relevant policies of this Plan and, where practical and feasible, the following site specific requirements:

- 2.26 Within the first bullet point, the Consortium consider that the requirements in terms of timing of submission of the Development Brief should be clarified, and the process for NNDC to endorse it. As currently drafted, it is not clear whether "prior approval and adoption of" means that the Development Brief would need to be approved and adopted before any application could be made, or just before any decision on an application could be made. NNDC have indicated that the intention was the latter, and consider that a change to the text is not needed [document A5.10]. However, the text changes suggested by the Consortium would provide clarity, and would remove the need for formal 'adoption' of the Development Brief which implies that the Development Brief would become a Supplementary Planning Document, which is not the intention due to the timeframes involved. Alternatively, it may be appropriate to retain NNDC's wording, omitting the need for 'adoption', but provide clarification in the supporting text.

1. ~~Prior approval and adoption of~~ A comprehensive Development Brief incorporating a site wide Vision and Master Plan demonstrating how the development will respond to the particular characteristics of the site and detailing the delivery of all of the uses and infrastructure required in this policy, [will be submitted with the first planning application for the site. The Development Brief and Vision and Masterplan, which will be approved before the determination of the first application, shall inform any further applications for the site.](#)

2.27 The same position applies to the second and third bullet points.

2. ~~Prior approval of~~ A site wide Design Code to complement the Development Brief detailing the design principles for all development and land uses [will be submitted with the first planning application for the site. The Design Code, which will be approved before the determination of the first application, shall inform any further applications for the site.](#)
3. ~~Prior approval of~~ A Green Infrastructure Strategy detailing the delivery of the green infrastructure including new areas of open spaces, play areas, sports pitches, strategic landscaping and green corridors, [will be submitted with the first planning application for the site. The Green Infrastructure Strategy, which will be approved before the determination of the first application, shall inform any further applications for the site.](#)

The Green Infrastructure Strategy should complement principles in the Design Code and Drainage Strategy [and will be informed by discussions with consultees to ensure it reflects need and demand.](#) Delivery of on-site green infrastructure should provide the opportunity to contribute towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS);

2.28 Minor revisions to the fourth bullet point are considered necessary to ensure that the policy is justified and effective. These changes primarily seek to build in flexibility to respond to the evidence as it evolves during the preparation and determination of the outline planning application.

4. Development proposals will provide the following ~~specific~~ green infrastructure:
 - i. ~~at least approximately~~ 17.47 hectares of new public open space including a new 'town park' of ~~at least approximately~~ 2ha, new sports pitches of approximately 2ha and a minimum of 2.4ha of allotments, [or, where appropriate and informed by discussions with relevant stakeholders, qualitative improvements considered to be of equivalent value;](#)
 - ii. a substantial area of strategic green infrastructure of ~~minimum~~ [approximately](#) 10ha to the south and western countryside edge of the development to create a new green edge of the town;
 - iii. enhancement of the Weavers Way corridor acting as a green access spine through the development including improving biodiversity along the corridor. It will provide a pedestrian & cycle crossing point across the link road that prioritises these uses over vehicle traffic;
 - iv. a new green corridor which will traverse north to south through the development providing an access and biodiversity corridor;

2.29 In respect of bullet point five, the same points that were relevant to 1, 2 and 3 apply.

5. ~~Prior approval of~~ A Drainage Strategy detailing the delivery of sustainable drainage and flood mitigation & storage measures that will be integral to the urban development and green infrastructure, including using surface water runoff as a resource that contributes to water sensitive urban design (WSUD) and integrating the water cycle within the built and green

environment, will be submitted with the first planning application for the site. The Drainage Strategy, which will be approved before the determination of the first application, shall inform any further applications for the site.

2.30 Within their proposed additional modifications, NNDC have sought revisions to bullet point six, some of which are supported by the Consortium, and some of which are not. The Listed Buildings and Conservation Areas Act, 1990, sets out a general duty in the exercise of planning functions to preserve Listed Buildings and their settings, and in respect of Conservation Areas to preserve or enhance them. These duties are broadly reflected in the NPPF, which refers to the “desirability of sustaining and enhancing the significance of heritage assets”. Given the wording of the Act, it is not considered justified to set out an absolute requirement to enhance heritage assets, and we have therefore suggested alternative wording. Similarly, the Council’s suggested additional modification (PMIN/14.3/04) to specifically require landscape buffering and open space to be used to preserve the setting of the Listed Buildings at Bradmoor Farm is not considered to be justified, as there may be alternative strategies that would achieve the same outcome.

6. Proposals should appropriately use design, layout and landscaping to ~~protect~~ preserve and, where opportunities arise, enhance heritage assets and their settings including designated and non-designated heritage assets including the ‘Battlefield Site’. ~~Landscape buffering and open space should be used to protect and enhance~~—This should include a design, layout and landscaping that protects ~~and enhances~~ the Listed Buildings at Bradmoor Farm;

2.31 Bullet point seven is also subject to proposed additional modifications by NNDC (PMIN/14.3/05) to provide more detail on specific hedgerows and trees which it wishes to see retained. Again, the Consortium consider that these inclusions are not justified as the requirements are not based on proportionate evidence. The identification of hedgerows and trees to be retained should be based on detailed evidence gathered during the Masterplanning process, and balanced against other material considerations as part of a planning application.

7. Retain and enhance existing hedgerows ~~on Greens Road, and the southeastern and western boundaries within the site, where possible~~. Landscape buffers and/or green corridors will, where appropriate, be provided along the existing urban edge of the town to protect the amenity of existing residential areas, and along Weaver’s Way and the northernmost boundary. ~~Retain existing mature trees along Skeyton Road and the eastern boundary of the site;~~

2.32 It is considered that a more comprehensive redrafting of the ‘Sustainable Transport’ section of the policy is required, to reflect the evidence gathered in the Draft Transport Assessment prepared by AECOM and provided at Appendix B of their separate Matter 5 Hearing Statement, and NCC’s Position Statement (Appendix 2). The nature of the key off-site highway mitigation measures is now understood, and can be reflected in the policy wording, to provide certainty. In order to ensure that such mitigation is effective, it will need to be delivered at an appropriate time in the development, the work undertaken in support of the Draft Development Brief indicates that the mitigation at Coltishall will need to be brought forward as early as possible. Bullet point 9 below, therefore, introduces a requirement for a Phasing and Delivery Plan to be agreed as part of the first planning application.

2.33 As previously set out, the evidence indicates that it is not necessary for the link road to connect to North Walsham Industrial Estate in order to mitigate the impacts of the development, and consequently this requirement should be omitted.

8. A Transport Assessment, the scope of which is to be agreed with the Local Highway Authority, will be undertaken to identify appropriate off-site highway mitigation measures. These should include, but are not limited to:
 - Traffic management measures and capacity improvements on the B1150 at Coltishall and Horstead;
 - Pedestrian safety improvements at Coltishall and Horstead to be agreed with the Highway Authority, which may include works at Ling Way, High Street and the B1150/ Mill Road/B1354 junction;
 - Improvements to the signalised junction at Norwich Road, North Walsham;
 - Measures to discourage the use of Aylsham Road and Skeyton Road, North Walsham by motor vehicles.
9. The agreed off-site highway mitigation measures will be delivered in accordance with a Phasing and Delivery Plan that will be agreed as part of the first planning application for the site. Any mitigation measures required at Coltishall and Horstead will be delivered at the earliest possible opportunity to mitigate construction impacts.
10. Delivery of a new road designed as an attractive main residential street through the development with mixed-use frontage usages and segregated cycle paths and footways. This new road should be suitable for HGV traffic (including high sided vehicles) and will connect Norwich Road to Cromer Road. It should be delivered at the earliest opportunity, in accordance with a phasing plan agreed as part of the first Planning Application.
11. Prior to any development to the north of the railway line, assessment of the impacts of this development on the railway bridge, will be required, and any mitigation measures identified and delivered as appropriate;
12. Provision of a network of interconnected streets, squares, green corridors and public spaces which prioritise moving around on foot and by cycle over the use of private motor vehicles;
13. Delivery of appropriate public transport measures on site providing facilities and regular services to/from the town and key services;
14. Provision of off-site pedestrian and cycle route improvements to the town centre, key services and railway station;

2.34

NNDC are seeking to amend bullet point 14 (PMIN/14.3/06) to include a requirement for “not less than 2.5ha” of land to be provided for the primary school. Whilst the Consortium acknowledge the need to provide land for a primary school, and that this is the current requirement specified by NCC, it is considered appropriate to swap “not less than” for “approximately” in order to provide flexibility to adapt to changing requirements. In our recent experience, the precise quantum of land needed can vary, and the proposed wording suggested by the Consortium would make provision for that possibility, ensuring that the policy is justified and effective.

15. Provision of community facilities including **approximately 2.5ha of land** for a new 2 form entry primary school ~~of not less than 2.5ha of land~~ focused in a broadly central location within the

development, a local centre providing options for local convenience retail and health services and other community uses;

2.35 In respect of bullet point 15 (original numbering 16), NNDC are proposing to amend the wording in accordance with the Consortium's Regulation 19 comments (PMIN/14.3/03) to clarify that any enhancements to the facilities at North Walsham Football Club would form part of the wider Green Infrastructure strategy. This change is considered to be justified, as there is no evidence to suggest such enhancements are required in addition to the other Green Infrastructure requirements, and will ensure that the policy is effective.

2.36 No revisions to bullet points 16 or 17 (original numbering) are sought by either the Consortium or NNDC.

2.37 A new bullet point 18 (now 19) is suggested by NNDC (PMIN/14.3/02) in respect of Mineral Safeguarding. The Consortium are willing to accept this for clarity, although it is arguably not necessary as it duplicates a Policy already in the wider Adopted Development Plan for the site i.e. Norfolk Minerals and Waste Core Strategy Policy CS16. It may be more appropriate to include this requirement within the Supporting Text to the policy, for information purposes.

2.38 A 'clean' copy of the Policy wording suggested by the Consortium can be found at Appendix 4.

Supporting Text

2.39 The Consortium consider that a number of modifications to the supporting text to Policy NW62/A should be made.

2.40 Specifically, paragraph 14.3.3 should be amended to reflect the fact that the link road is not required to connect to the North Walsham Industrial Estate, and to provide clarification on the requirements for land for the primary school.

14.3.3 It is proposed that North Walsham West would deliver the following:

- approximately 1,800 dwellings;
- a western link road - linking Cromer Road to Norwich Road ~~and via Links Road to North Walsham Industrial Estate~~;
- 7 hectares of serviced employment land;
- Land for a new 2 form entry primary school, of approximately 2.5ha – the precise requirement will be agreed at planning application stage through discussions with Norfolk County Council;
- significant areas of landscaping and public open space;
- other required infrastructure, improvements and mitigation including, but not limited to, health services, drainage and power.

2.41 Paragraph 14.3.4 should also be amended to explain the aspiration for the link road to facilitate future northern and southern connections, and to clarify the requirements in respect of the railway bridge, as set out above.

14.3.4 Development proposals will need to take into account:

- A Transport Assessment will be required that will explore the benefits of the western link road and the impacts (with mitigation required) on the surrounding network including the route to Norwich via Coltishall. The Transport Assessment should include an assessment of walking and cycling routes and a comprehensive strategy to promote walking and cycling and other modes of sustainable transport.
- The link road will be designed to facilitate future northern and southern connections
- Development to the north of the railway line will need to be subject to additional assessment of the impacts on the highway network, which may include improvements to the railway bridge or an alternative access strategy. Any improvements/mitigation measures identified will need to be delivered at an appropriate stage.
- The site has a number of public rights of way running through it, including the Weaver's Way. These will need to be retained and enhanced as part of any proposal.
- There is limited surface water drainage capacity to the west of North Walsham. A comprehensive SUDs scheme will be required.
- Development of the scale proposed will require comprehensive infrastructure enhancements including, but not limited to, education, health and community facilities.
- Proposals will need to provide for the retention and potential expansion of North Walsham Football Club.

2.42 Paragraph 14.3.6 should be amended to provide clarity on the meaning of “Prior Approval” if that wording is retained within the Policy.

14.3.6 In 2021 the Planning Authority began work on the preparation of a Development Brief for the site and consulted the local community and other stakeholders on an overarching Vision for the development and a set of high level principles. The feedback has informed the policy below and will provide the basis for the preparation of a detailed Development Brief for the site which will be subject to further public consultation. The site (in part or whole) cannot be brought forward without the prior ~~adoption~~ approval of a comprehensive Development Brief and approval of a Design Code for the whole site; this means that a decision on any planning application cannot be made until the Development Brief and Design Code have been approved.

Question 5.6.4(d) - Have the impacts and effects of development been properly taken into account?

- 2.43 The impacts and effects of the development have been properly taken into account. The site has been through a thorough and comprehensive assessment process at various points during the preparation of the Local Plan, as set out in Document C6 (Development Site Selection Methodology). The site and its component parts have been subject to both Sustainability Appraisal and more detailed site assessment, based on the criteria adopted by the Norfolk Authorities for their Housing and Economic Land Availability Assessment (HELAA).
- 2.44 Technical evidence has been prepared to support preparation of a Draft Development Brief [Document EX010] (please refer to the Consortium's response to Question 5.6.4(b) later in this document for further explanation of this document), informed by consultation with key stakeholders, which further considers the impacts and effects of the development, to an extent which goes beyond the usual scope of consideration at Local Plan stage. This is summarised below, following the key topics of the HELAA assessment.
- 2.45 In terms of access to the site, it has been demonstrated in the technical evidence underpinning the Draft Development Brief, specifically the Draft Transport Assessment prepared by AECOM (Appendix B of their Hearing Statement), that it is possible to achieve safe and sustainable access to the site by all means, and the Local Highway Authority raise no objections in this regard as set out in their Position Statement (Appendix 2 and 3). The policy requires a further application-stage Transport Assessment to be prepared, to ensure that any off-site highway mitigation measures are identified, and delivered at an appropriate stage in the development. The Draft Transport Assessment has demonstrated that with appropriate mitigation, development of the site will not have a detrimental impact on the functioning of trunk roads and/or local roads.
- 2.46 The site has good accessibility to local services and facilities. The Draft Development Brief identifies the key amenities and services located within North Walsham and whilst some of these are within 15 minutes walking distance, all are within cycling distance. In addition, the Draft Development Brief sets out a vision to enhance the existing local bus services, to ensure that the town centre can be easily accessed. The railway station is within walking distance of the site, providing opportunities to access facilities and services further afield, such as within the county town of Norwich which is 30 minutes away and benefits from an hourly service. The existing facilities within the town will be complemented by the provision of a primary school and local centre within the site, which would include community and healthcare uses as required, and would provide services to meet the everyday needs of residents.
- 2.47 Work undertaken to support the Draft Development Brief demonstrates that there is sufficient utilities capacity available and this has been confirmed by key statutory undertakers such as Anglian Water in their comments on the Draft Development Brief (Appendix 5). There are a number of utilities crossing the site; a number of water mains cross the southern portion of the site, and there is an Anglian Water Tunnel which links the Water Tower with the drinking water abstraction borehole located within the site. A BT cable runs along the alignment of Aylsham Road and a number of high and low voltage cables cross the site. There are also a number of services running along Cromer Road and North Walsham Road. The Framework Masterplan within the Draft Development Brief demonstrates that these services, and their associated easements, can be readily accommodated within the site layout. The costs of supplying the site with the relevant utilities have been factored into Viability Work undertaken by Savills on behalf of the Consortium,

and the Consortium confirm that there are no issues in this regard (please refer to the Consortium's response to Question 5.6.4(j) for further details).

- 2.48 In relation to contamination and ground stability, the evidence indicates that the site has been in a mixture of agricultural and commercial use dating back to the 1800s, and any contamination is therefore expected to be isolated and localised. The overall risk from soil contamination is assessed to be low for human health and property. There is no indication of any issues with ground instability.
- 2.49 The site is located within Flood Risk Zone 1 (low risk), contains no watercourses and is at low risk of surface water flooding. Initial ground investigations show the site is predominantly underlain by sands and gravel and is generally freely draining.
- 2.50 The site is not adjacent to a Coastal Change Management Area or a Coastal Flood Hazard Area.
- 2.51 In terms of market attractiveness, the site is in a location that is considered likely to be attractive to potential purchasers and businesses. North Walsham is a pleasant market town, and its rail connection to Norwich is a particular benefit that few settlements in the District possess. This is borne out by the fact that the Consortium includes two well respected developers who have a proven track record of delivery in the local area.
- 2.52 Development of the site would, inevitably, have an impact on the landscape, as is the case for any large scale greenfield development. However, the landscape here is not defined as a 'sensitive landscape' and, as demonstrated in the Draft Development Brief, the vision for the site is for the development to be landscape-led with a strong Green Infrastructure network that will help assimilate the development into its surroundings.
- 2.53 The site has the potential to impact on the townscape of North Walsham, and in particular key views to the Conservation Area and various designated heritage assets. However, the Draft Development Brief demonstrates that this impact can be mitigated through careful design and landscape buffering. For example, the most significant view is of St Nicholas Church, along the public footpath that bisects the site, and the Masterplan not only protects this view by integrating the route into the Green Infrastructure, but also recognises the opportunity for the church tower to become a key wayfinding point providing a tangible connection to North Walsham's heritage.
- 2.54 In terms of ecology and biodiversity, the development will be subject to mandatory 10% Biodiversity Net Gain (BNG). The Weavers Way County Wildlife Site crosses the site, and the development has the potential to impact on this. However, the Draft Development Brief demonstrates that any impacts can be mitigated through the creation of green corridors adjacent to Weavers Way. The site is located within the Surface Water Catchment of the River Bure, where there is a requirement to consider impacts of Nutrient Pollution on relevant Habitats Sites within the Norfolk Broads. However, water from North Walsham Water Recycling Centre does not drain into this catchment, and surface water drainage will be managed on site via SuDS through infiltration techniques, thereby preventing the passage of nutrients into the existing water environment.
- 2.55 There are a number of Designated Heritage Assets surrounding the site, which are identified in the Draft Development Brief. Impacts on these assets can be mitigated through the design and layout of the site, as required by the policy. Initial archaeological investigations (desk-based assessment and geophysical survey) have been undertaken and Norfolk County Council's Historic Environment

Service have confirmed that they are content for any future archaeological work to be secured through a planning condition on any future permission (Appendix 6). In their comments on the Draft Development Brief (Appendix 7) Historic England have raised no fundamental concerns about the proposed allocation, and the comments have been incorporated into a revised version of the Development Brief.

- 2.56 The proposed development would not result in the loss of any Open Space, and would provide significant areas of new Public Space across a wide range of typologies which would meet the need of future, and existing, residents.
- 2.57 The proposed development would be compatible with adjoining uses, which are predominantly residential. Again, the Draft Development Brief considers neighbouring uses, and identifies areas where buffers may be required to ensure that any impacts are suitably mitigated.
- 2.58 It is clear from the above that the potential impacts and effects of the proposed development are properly understood and have been appropriately considered in arriving at the proposed allocation.

Question 5.6.4(e) - Are the components of the proposal (number of dwellings, units of elderly care accommodation, amount of public open space etc) in the first sentence of the policy for the site justified?

- 2.59 The first sentence of the policy requires the site to provide “approximately 1,800 dwellings, 7 hectares of employment land, green infrastructure, community facilities and a road linking Norwich Road, Cromer Road and the industrial estate”. It is considered that these requirements are justified, with the exception of the requirement to provide a road linking through to the industrial estate, as per the definition set out in paragraph 35(b) of the NPPF: “An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”,
- 2.60 The site represents a significant expansion of North Walsham, acknowledged in its description as a Sustainable Urban Extension. Paragraph 74 of the NPPF recognises that, *“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).”* The NPPF further encourages Authorities to identify suitable locations for such development where this can help to meet identified needs in a sustainable way. Site NW62 will deliver a significant proportion of the District’s housing needs during the Plan period and beyond, as well as providing employment land, community facilities and elderly persons’ accommodation, and it has been demonstrated at all previous stages of preparation of the Local Plan that the site is a suitable and sustainable location for development, and can be delivered without any unacceptable residual impacts.
- 2.61 Amongst other things, paragraph 74 of the NPPF also advises Authorities that when considering large-scale development of this nature, they should, *“ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access.”* The allocation’s requirement for provision of 7ha of employment land not only builds on the site’s location close to existing employment development at the northern end, but ensures that the development will have access to employment opportunities within the development itself. Similarly, the requirement to provide community facilities within the development ensures that a range of services will be easily accessible to future residents within the site itself, in addition to the services and facilities already on offer within the town. The policy expands on the requirements of the first sentence within the body of the wording, and amongst other things specifies that land is required for a new 2-form entry primary school. This requirement is based on proportionate evidence provided by the County Council in their role as Local Education Authority, and therefore justified.
- 2.62 The Green Infrastructure requirements are based on the standards set out in the supporting text to Policy HC2, which reflects the 2019 Open Space Assessment [Document G11] which in turn is based on various local and national standards. The precise requirements have been adapted for this site, for instance to reflect the desire to create a ‘Town Park’ as a key focal point of the development, the need to provide space for the expansion of the football club, and the vision for the development to be landscape-led, with a large area of greenspace to the south and west to create a new green edge to the town. It is considered that these requirements are justified.
- 2.63 The requirement to provide Community Facilities is also considered to be justified. The need for a new primary school has been identified by Norfolk County Council, and is based on the predicted number of pupils that will be generated by the development, coupled with the capacity of the schools in the town. The requirement to provide a local centre providing options for local

convenience retail and health services and other community uses is also considered to be justified; at this stage the precise requirements for these uses is not known, but the policy wording provides a hook to ensure that what is needed, which will be determined through discussions with the relevant parties at planning application stage, is delivered. This is in accordance with NPPF paragraph 74, which emphasises the need to ensure that larger scale development is supported by services within the development itself, and will help deliver a truly sustainable development.

- 2.64 The policy requirement to provide a road linking Norwich Road in the south to Cromer Road in the north is also considered to be justified; the need for this has been established through proportionate evidence prepared by both NCC (see Appendix 2) and within AECOM's Draft Transport Assessment (Appendix B of their Hearing Statement). However, the requirement for this link to continue to the Industrial Estate is not justified; as set out in NCC's Position Statement, *"the evidence does not support the current policy requirement... for a link over the railway for access to the Lyngate/Folgate Rd industrial estate."* Furthermore, the land required to deliver such a link is not included within the allocation boundary, and the existing road infrastructure within the industrial estate is not Adopted highway.
- 2.65 The obvious reasonable alternative is not to provide a link through to the industrial estate, and this has been demonstrated to have no significant detrimental impacts on the delivery of the wider policy objectives. This approach would not preclude a link coming forward at a future date, should it become either necessary or desirable with funding sourced from elsewhere. This part of the wording should therefore be omitted.

Question 5.6.4(f) - What form would the public open space take?

- 2.66 Criterion 4 of Policy NW62/A sets out the requirements for the Public Open Space – a total of at least 17.47ha is required, to include a 'Town Park' of at least 2ha, new sports pitches of 2ha, and a minimum of 2.4ha of allotments. This is in addition to a minimum of 10ha of strategic green infrastructure to the south and west of the site.
- 2.67 At Regulation 19 stage, the Consortium sought revisions to criterion 4, to insert the word 'approximately' in front of each requirement, and to add text to the end of the requirement allowing, *"where appropriate and informed by discussions with relevant stakeholders, qualitative improvements considered to be of equivalent value;"* These revisions are considered necessary to ensure that the policy has sufficient flexibility to respond to changing circumstances, and any evidence gathered at planning application stage which may indicate that a deviation from the figures set out in the policy would be appropriate and/or desirable. For example, it may be the case that through future discussions, certain stakeholders, such as the Town Council, would prefer a smaller but higher quality provision of a particular type of open space, rather than quantitative provision.

Question 5.6.4(g) - Having regard to these components, is the estimate of site capacity justified?

- 2.68 It is considered that the estimate of site capacity (approximately 1,800 dwellings) is justified. The work undertaken to date on the Draft Development Brief [EX010] demonstrates that all of the requirements of the policy can be met, whilst delivering the proposed quantum of housing in a sustainable manner which integrates with, and positively contributes to, the existing community. The Framework Masterplan within the Development Brief adopts a site-wide average density of 34 dwellings per hectare (dph) for the development parcels, with a range of densities envisaged across the different character areas. Whilst 34dph represents an appropriate density for an edge-of-settlement location, the supporting text of the Local Plan (paragraph 9.2.4) envisages that densities of up to 40dph could be achieved within the towns and there is, therefore, clearly scope to increase densities and deliver more homes.
- 2.69 In addition to the approximately 1,800 dwellings, the site could also deliver elderly persons/specialist accommodation in accordance with Policy HOU 2. In the region of 300-350 such bedspaces could be provided across the site, in varying formats.

Question 5.6.4(h) - What is the land ownership position and is the site currently being promoted by a developer?

- 2.70 The majority of the site is within the ownership of three parties (the Consortium), who have Collaboration and Equalisation Agreements in place (see plan at Appendix 1). In turn, the Consortium have a Promotion Agreement over this land, and Flagship and Lovell also have an Option Agreement in place. As set out in the Consortium's Regulation 19 Representation [Document A5.8], all three of the Consortium members have an excellent track record of delivering large-scale housing development in the local area.
- 2.71 The remaining part of the site, which is almost entirely located to the north of Cromer Road, is within the ownership of a further seven parties. It is understood that discussions with these landowners are ongoing, but they have previously put their land forward for allocation, and none have raised objections to the proposed allocation at earlier stages in the Plan-making process, nor commented negatively on the Draft Development Brief. It is therefore reasonable to conclude that the land remains available for development.
- 2.72 All of the critical strategic infrastructure, including the necessary extent of the link road, the primary school and community facilities, can be delivered on land within the Consortium's control.

Question 5.6.4(i) - Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?

- 2.73 As set out in response to Question 5.6.4(e), it is considered that the components of the proposal in the first sentence of the policy for the site are justified and consistent with national policy, with the exception of the requirement for the link road to extend to North Walsham Industrial Estate.
- 2.74 They would also be effective i.e., deliverable over the plan period, insofar as they are intended to be. That is to say that the Housing Trajectory makes it clear that the whole site is unlikely to be delivered within either the Plan period to 2036 as currently proposed, or the extended Plan period to 2040, but the element that is intended to be delivered in the Plan period is deliverable (please refer to the Consortium's response to Question 5.6.4(k) for further details on deliverability).
- 2.75 The specific requirements of the allocation are also based on effective joint working on the single relevant cross-boundary strategic matter, which is the traffic impact of the development on settlements outside the District i.e., within Broadland District Council's jurisdiction and the intention is that a Statement of Common Ground is prepared to confirm this. However, for clarity and to ensure support from all parties, some revisions to the policy wording are suggested in relation to this matter as set out in our response to question 5.6.4(c).
- 2.76 Taking each of the subsequent requirements in turn, the requirements for a Development Brief and Design Code to be prepared are justified, and in accordance with the NPPF, specifically paragraphs 133 and 134. Likewise, the requirement for them to be approved before any planning application is approved is also considered to be justified, given the need to ensure a comprehensive and holistic development of the site over a significant number of years.
- 2.77 Similarly, the requirement to prepare and have approved a site-wide Green Infrastructure Strategy before any planning application is approved is considered to be justified, given the need to ensure a comprehensive and holistic development of the site over a significant number of years, and to ensure that it is effective i.e., deliverable over the plan period. This approach is considered to be an appropriate strategy, which will set the framework for provision of open space, play areas, sports pitches, strategic landscaping and green corridors, across all phases of development, ensuring consistent delivery of a high-quality environment. It accords with paragraph 96 of the NPPF, which states that planning policies should enable and support healthy lifestyles through a range of measures including the provision of safe and accessible green infrastructure and sports facilities. In addition, paragraph 97 of the NPPF, requires planning policies to, amongst other things, plan positively for the provision of open space.
- 2.78 As set out in response to Question 5.6.4(e), the specific green infrastructure requirements are based on proportionate evidence, in the form of the 2019 Open Space Assessment [Document G11]. However, it is considered that flexibility should be added to reflect the potential for needs to change over time, and the Consortium have therefore recommended that the policy wording is adjusted to include the word, "approximately" before each requirement, and to add, "or, where appropriate and informed by discussions with relevant stakeholders, qualitative improvements considered to be of equivalent value". This will ensure that these aspects of the policy are justified and effective.
- 2.79 The requirement to prepare a site-wide Drainage Strategy in advance of any application being approved is also considered to be justified, as it will ensure that a comprehensive sustainable drainage system is delivered across the whole allocation. Designing the drainage strategy in a

holistic manner, rather than piecemeal, will maximise the opportunities to ensure that the drainage system achieves multifunctional benefits wherever possible, in accordance with paragraph 175 of the NPPF. It will also ensure that it is effective i.e. deliverable over the Plan period.

- 2.80 In respect of bullet point 6, whilst the general thrust of this requirement is considered to be justified, the precise wording does not fully align with national policy. As set out in our response to question 5.6.4(c) and within Appendix 4, it is suggested that the wording is altered to, "Proposals should appropriately use design, layout and landscaping to sustain and, where opportunities arise, enhance the significance of heritage assets and their setting including the "Battlefield Site" and the Listed Buildings at Bradmoor Farm" to bring it into line with the requirements of the NPPF, in particular paragraph 196.
- 2.81 The Council has suggested additional minor modifications to bullet point 7 (PMIN/14.3/05), introducing requirements to retain specific existing hedgerows and trees. Whilst the general desire to retain existing vegetation is considered justified and in accordance with national policy, specifically paragraph 136 of the NPPF, the Consortium considers that the proposed additional wording is too specific and is not justified as it is not based on proportionate evidence. The identification of specific trees and hedges to be retained and or/removed will take place at planning application stage, when all evidence has been prepared and can be considered in the round, including tree surveys, ecological work and landscape and visual assessment work.
- 2.82 As set out in our response to question 5.6.4(c), it is considered that the Sustainable Transport section of the policy requires rewording to ensure that it is justified and effective. The suggested revised wording set out in Appendix 4, would ensure that the requirements for development of the site are justified, consistent with national policy and effective. The Draft Transport Assessment that supports the Draft Development Brief establishes the key off-site highway mitigation works that are required, and this has been agreed with NCC (see Appendix 2). The proposed wording in respect of phasing and delivery will ensure that the policy is effective, and ensure that there are no severe or unacceptable highway impacts, in accordance with NPPF paragraph 115.
- 2.83 The requirement to make provision for community facilities, including a 2-form entry primary school is, as set out in our response to Question 5.6.4(e), considered to be justified and in accordance with national policy.
- 2.84 At bullet point 16 of the policy, there is a requirement to consider options for the enhancement of facilities at North Walsham Football Club. The requirement for the site to provide sports pitches is in accordance with paragraph 97 of the NPPF and is justified as it is based on the evidence contained within the 2019 Open Space Assessment, that there is a need for provision of 1.6ha per 1000 population based on Fields in Trust Guidance, and that there is an under provision of such space within North Walsham. A revision to the wording of this part of the policy is, however, required, to make it clear that this requirement forms part of the wider Green Infrastructure requirements specified in Section 4 of the policy, and is not an additional requirement. In terms of the reference to North Walsham Football Club, given that the site adjoins the Club, it is logical for options to enhance facilities here to be considered.
- 2.85 As set out in response to Question 5.6.4(e), it is considered that the requirement to provide 7 hectares of employment land is justified, and in accordance with national policy.

- 2.86 The requirement to provide approximately 1,800 homes with a mix of dwelling types, sizes and tenures in accordance with Policy HOU2 of the Plan, and to provide a range of densities and layouts, is justified and in accordance with national policy. It will also be effective, i.e. deliverable over the Plan period, insofar as this is intended (see response to Question 5.6.4(k)).
- 2.87 The Council propose through additional Minor Modifications (PMIN/14.3/02), to add a bullet point relating to Mineral Safeguarding. Again, this is considered to be justified, as the site is underlain by a defined Mineral Safeguarding Area for sand and gravel, and is in accordance with Section 17 of the NPPF. However, it is arguably not necessary to add this requirement to the policy as it is already a requirement of the Adopted Development Plan.

Question 5.6.4(j) - Given the components of the proposal and the site requirements, would development of the site be viable?

- 2.89 Savills, on behalf of the Consortium, have undertaken a high-level Viability Assessment of the site which has regard to the specific requirements of the Policy NW62/A, and which has been agreed with NNDC. The work undertaken by Savills confirms that that the site is viable. The Viability Assessment prepared by Savills has been informed by the Draft Development Brief [EX010], as well as the technical work and stakeholder discussion that have informed the preparation of that document. No issues have been raised during the preparation of the Draft Development Brief [EX010] that are considered to impact the viability of the site.
- 2.90 A Statement of Common Ground is being prepared between North Norfolk District Council, Norfolk County Council Highways and the Consortium, which confirms the site is available, viable and deliverable.

Question 5.6.4(k) - Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

- 2.91 The Council's updated housing trajectory [EX006] anticipates that the first dwellings will be delivered on site in 2026/27, with 30 delivered that year, 60 the following year, and thereafter 100 per year, with peaks of 160 units per year in 2029/30, 2032/33, 2035/36 and 2038/39. This would see 1,530 units delivered in the period to 2040.
- 2.92 It is considered that this trajectory is generally realistic. Assuming that an Outline Planning Application is submitted in Q2 2024, which is the Consortium's intention, and allowing an 18-month period for approval of the application (including s106 agreement), it is considered realistic that Outline Planning Permission could be in place by Q4 2025.
- 2.93 The Consortium anticipate commencing work on the first Reserved Matters (RM) application, together with the Link Road, whilst the s106 is negotiated, enabling submission of the first RM application in Q1 2026. A six-month determination period for this application is considered appropriate, with further Technical Approvals taking an additional three months. On this basis, it is envisaged that construction works for Phase 1 could begin by the end of 2026, with the first units delivered in 2027/2028. Therefore, whilst it may be challenging to deliver 30 units in 2026/27 as per the Council's Housing Trajectory, it is likely that more than 60 units will be delivered in 2027/28, and therefore the slight delay to completions would not materially impact the overall number of dwellings delivered in the Plan period.

Question 5.6.6 - What is the vision for the western link road? Would it function as a town by-pass taking heavy goods vehicles away from the town centre? Given expected traffic flows, would suitable environment and connectivity between the housing on each side and the town centre be achieved? Would it include a northern extension over the railway to connect to Cornish Way, or a southern extension to the A149 south. Are these essential to the effectiveness of the road, and if so, would they be a requirement of developing the allocation? If not, how might they be funded?

- 2.94 A separate Hearing Statement has been prepared by AECOM, the Consortium's Transport Consultants, which provides a comprehensive response to this question. The key salient points are summarised below.
- 2.95 The primary function of the new road is to provide access to the housing and other uses that will be delivered on the site. It is intended to be an attractive street, with frontage development on both sides and a safe and attractive route for active travel users with segregated pedestrian and cycle facilities and crossing points along its length.
- 2.96 Whilst it will also deliver significant benefits in terms of providing network resilience and providing alternative routes for some HGV traffic, its purpose is not to function as a town bypass.
- 2.97 The road will require a relatively wide highway corridor, but this can be softened with landscaping, including the provision of street trees, to ensure that a suitable environment is created and that the road does not form a barrier to pedestrian movement. A typical cross section is provided within the Draft Development Brief [EX010], which demonstrates how this could be achieved.
- 2.98 The new main street will run between the B1150 Norwich Road in the south, and the A149 Cromer Road in the north. It will not extend south to the A149, nor will it connect to Cornish Way to the north, as it has been demonstrated (see Appendix 2) that these connections are not required to mitigate the impacts of the proposed development. Consequently, these extensions are not a requirement of the allocation, and alternative sources of funding have not been considered by the Consortium, as they are not required.
- 2.99 The development of the land parcels to the north of the railway line is likely to require access over the railway line, although alternative access solutions may be possible (e.g. via the southern stretch of Bradfield Road). A range of potential options exist to service these parcels, and this will need to be subject to further assessment and investigation before any development on those land parcels comes forward. A revision to the policy wording and supporting text has been suggested to reflect this. However, it is clear that access over the railway line is only required in connection to those land parcels, and is not a requirement of the wider allocation.
- 2.100 Notwithstanding the above, the link road will be designed to ensure that it does not prejudice the ability to deliver northern and southern extensions, should funding for these be secured in the future. It is suggested that the Supporting Text to policy NW62/A should be amended to reflect this.

Question 5.6.7 - What would be the impact of traffic generation on the wider area, for example through the village of Coltishall, what improvements or traffic management might be required if needed to mitigate the effects of the scheme, are these costed and deliverable and has any effect on viability been taken into account?

- 2.101 A separate Hearing Statement has been prepared by AECOM, the Consortium's Transport Consultants, and provides a comprehensive response to this question. The key salient points are summarised below.
- 2.102 AECOM have worked closely with NNDC, NCC and BDC in the preparation of their Draft Transport Assessment (Appendix B of AECOM's Matter 5 Hearing Statement), and the scope of their assessment has been agreed with NCC.
- 2.103 In relation to traffic impacts on the wider area, Coltishall was identified as an area where there are existing network vulnerabilities, and modelling indicates that approximately 37% of development trips would use the B1150 which goes through Coltishall. Consequently, it was considered necessary to give more detailed consideration to the potential impacts on Coltishall and identify appropriate mitigation. Where deemed necessary to illustrate deliverability, designs for mitigation measures have been developed, informed by topographical surveys and highway boundary information. These designs have been subject to a Road Safety Audit with the Designers Responses accepted, and the mitigation strategy has been reflected in the viability work undertaken by Savills on behalf of the Consortium.
- 2.104 As set out in the Consortium's response to question 5.6.4(c), revisions to the Policy wording are proposed, to provide greater clarity and certainty in respect of the proposed mitigation.

Question 5.6.8 - About 7 ha of the site in the Cromer Road/Bradfield Road area is intended for employment use. Is this the allocated area North of Cromer Road? For effectiveness, should this be allocated as such? Would its development be phased in relation to the housing, and/or a requirement of it?

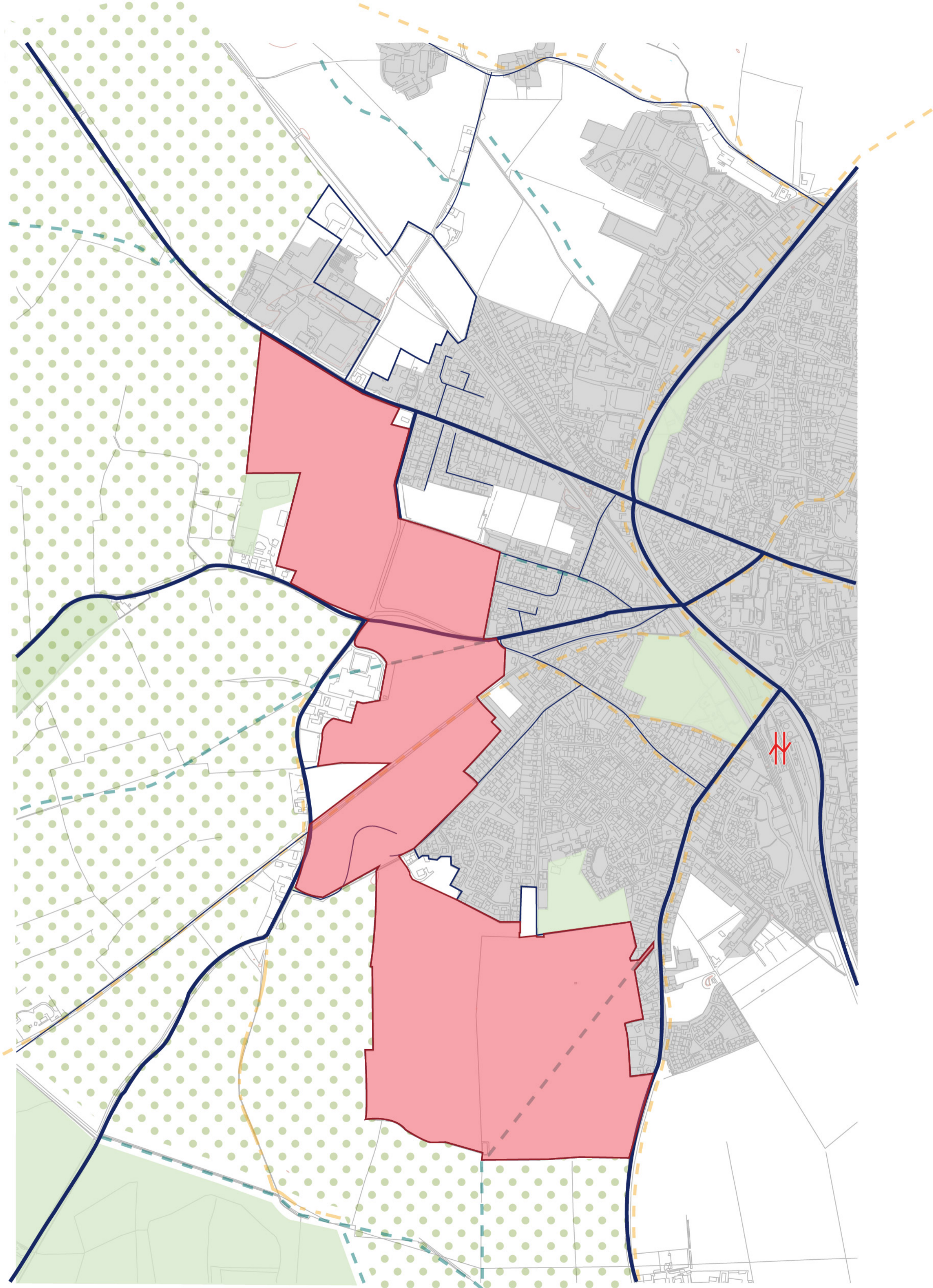
- 2.105 The allocation does not specify a location for the employment uses, and intentionally allows for flexibility. The work undertaken to prepare the Draft Development Brief [EX010] has identified that an appropriate location for employment uses would be towards the northern end of the allocation, where it would best complement existing commercial uses.
- 2.106 However, it is not anticipated that all of the land north of Cromer Road would be used for employment purposes; the Development Brief Masterplan anticipates that there could be some residential parcels to the north of Cromer Road, and some employment land immediately to the south of Cromer Road. Furthermore, depending on the nature of the employment uses, it may be appropriate to intersperse some employment land within the residential parcels; for example, care home provision may be considered to fall within the definition of an employment generating use, given the considerable number of jobs that such a use often creates.
- 2.107 In terms of the delivery of the employment land, it is anticipated that it would be phased in relation to the housing, to ensure that the employment opportunities required to support the additional housing growth are in place at an appropriate time. It is envisaged that the precise trigger points for delivery of the employment land would be agreed as part of the s106 agreement for the development of the site.

Question 5.6.9 - How would the development of the site be phased, and would the traffic effects within the town be acceptable during each phase? How does the cost of the western link road affect the viability and deliverability of development?

- 2.109 The detailed phasing of the development will be a matter for later consideration, as part of any planning application that comes forward. However, consideration has been given to potential influences on the phasing of the development, and in particular delivery of key elements of infrastructure, to ensure that there are no significant barriers to delivery.
- 2.110 Items that have been identified as important influences on any future phasing plan include:
- The need to avoid HGV and construction traffic using unsuitable routes such as Millfield Road;
 - The requirement to deliver early mitigation in Coltishall to mitigate construction impacts;
 - The need to prevent any increase in demand or traffic on Aylsham Road under the railway bridge in North Walsham due to the constrained 20 mph section with no footways;
 - The need to deliver pedestrian cycle and public transport facilities to each parcel of development as it comes forward to support promotion of sustainable travel patterns from the outset;
 - Potential need to support delivery of the A149/B1150 traffic signal scheme in advance of the Link Road; and
 - Delivery of the road linking B1150 Norwich Road to A149 Cromer Road to mitigate development impacts on the network in North Walsham, particularly on the local residential routes along Station Road, Millfield Road, and Aylsham Road;
 - The need to deliver land for the primary school at an appropriate time, to ensure sufficiency of delivery of primary education places;
 - The need to deliver the employment land at appropriate junctures to support the housing delivery;
 - The need to deliver the Green Infrastructure and Public Open Space at appropriate points to serve the housing delivered;
 - The need to ensure that the development is viable and infrastructure costs are appropriately spread throughout the development, where possible.
- 2.111 AECOM has developed an indicative phasing strategy for the transport mitigation measures in response to feedback from NCC regarding the Draft Transport Assessment, and this is included in their Matter 5 Hearing Statement. This has informed the viability exercise undertaken by Savills.
- 2.112 As set out in response to Q5.6.4(j), the development is viable, allowing for the cost of providing the link road between Cromer Road and Norwich Road. Whilst it is recognised that the link road should be delivered at the earliest available opportunity, careful consideration will be required at application stage to ensure that the development is viable. It is envisaged that trigger points will be secured through the S106 Agreement to enable this.

APPENDIX 1

CONSORTIUM-CONTROLLED LAND



APPENDIX 2

NCC POSITION STATEMENT ON POLICY NW62/A – DECEMBER 2023

Sarah Hornbrook

From: Richard Doleman <richard.doleman@norfolk.gov.uk>
Sent: 01 December 2023 15:40
To: Mark Ashwell
Cc: David Cumming; David Wilson - ETD; Liz Poole; Carey, Bevin; Sarah Hornbrook
Subject: North Walsham Draft TA and Policy NW62/A

Dear Mark

Below is a position statement from the Highway Authority on the proposed allocation in North Walsham as set out in policy NW62/A. It is an officer view based on the technical evidence reviewed to date and cannot prejudice any formal decisions of the Highway Authority.

NCC as Highway Authority has considered the draft TA in the context of evidence to support the proposed allocation of 1800 homes and 7 ha of employment land in North Walsham as set out in policy NW62/A. This response also sets out where the draft allocation policy can be strengthened and clarified in respect of the highway and transport requirements.

The assessment has considered the impacts of the growth and associated link road on traffic patterns in North Walsham and considered the key mitigation required to be delivered alongside the allocation. The TA has also considered impacts on the wider network, identifying the impacts on the B1150 through Coltishall as requiring more detailed analysis and development of mitigation.

As the work is to support allocation of a site in the emerging North Norfolk Local Plan it is not expected that the work identifies in detail all the mitigation measures required but provides sufficient information to enable a view to be drawn on the soundness of the allocation.

The Promoters consultant, AECOM, has sought the views of the highway authority in developing their TA which has provided the County Council the opportunity to shape the scope of the assessment.

The draft TA does not address phasing, and further work will need to be done on this. In this response The Highway Authority's view on the principles for phasing of transport infrastructure are set out.

North Walsham Assessment

The Link Road

A high-level study commissioned jointly between NCC and NNDC looked at the traffic impacts of a link road associated with the proposed allocation. That work considered a link road from the B1150 Norwich Road passing through the proposed allocation to the southwest of North Walsham and ending at the A149, Cromer Road. The study considered the distributional impacts of the link road and those effects on key junctions in the town. The study further considered options of a southern extension east to the A149, a northern extension through the employment area to the B1145 and the combination of both.

Based on that work NCC as Highway Authority advised that the most likely scenario to address transport impacts was the link road with a northern extension to the B1145.

The draft TA is a more up to date and in-depth consideration of the transport impacts of the proposed allocation and link road in North Walsham based on recent traffic counts and area wide traffic modelling . The key findings of the TA are.

A link road from the B1150 to the A149 Cromer Road is required to manage the transport impacts of the proposed allocation. The evidence in the TA does not support the need for a northern extension to the B1145. The evidence does not support the current policy requirement (point 11) for the delivery of a link over the railway for access to the Lyngate/Folgate Rd industrial estate. However, the allocation should be brought forward in such a way that does not preclude delivery of an extension of the Link Road to Folgate Road at some point in the future should it be required.

In principle the proposed cross section meets the need to create an attractive street that promotes walking and cycling and is of sufficient scale to fulfil a distribution function.

Alongside the link road the draft TA evidence shows that other network improvements are required in North Walsham.

Specific improvements identified are;

The B1150/A149 Norwich Road signalised junction
Improvements at the Aylsham Road railway bridge

Proposals have been developed for these and it has been shown that appropriate schemes can be delivered to mitigate the impacts of the allocation. These specific improvements should be explicitly referenced in the allocation policy as a requirement of the proposed allocation.

The B1150/A149 Norwich Road signalised junction

Other development in North Walsham has contributed towards an improvement at the junction. It is required that improvements are delivered alongside development of the allocation so the improvements should be a specific requirement set in policy. As the proposal provides vehicle capacity and active travel enhancements , the improvement should be delivered in the early stages of development prior to occupation.

Improvements at the Aylsham Road railway bridge

Given current network conditions and the issues the schemes are seeking to mitigate the highway authority would wish to see the Aylsham Road proposals phased to be delivered before Aylsham Road is connected to the wider network by the link road and before any significant traffic generating development on Aylsham Road is commenced.

The draft TA has considered walking, cycling and public transport.

Opportunities for improvements have been identified for the walking and cycling and public transport networks. It is expected that the exact nature or the improvements to be delivered will be determined though the subsequent planning application process. As opportunities exist and no fundamental obstacles to delivery of improvements have been identified, the Highway Authority considers that for this stage sufficient examination of the issues have been carried

out. Points 8, 9 and 10 of the draft allocation policy are considered sufficient to require the necessary exploration at the planning application stage.

North Walsham is on one of the routes identified in Norfolk County Council's Bus Service Improvement Plan. The proposals will be expected to improve service provision in line with BSIP requirements and this will need to be conditioned at the application stage.

Coltishall Assessment

The early link road work was also used to gain an understanding of wider network effects of growth. Given the high-level nature of the link road work and its reliance on pre-covid and lockdown traffic data it was concluded that whilst it could identify areas of interest it could not provide any quantitative data. This addendum to the original link road options work identified that further analysis was required of the B1150 through Coltishall.

The highway authority has required that the draft TA considers the impacts of the proposals on the B1150 through Coltishall, identified as the most significant impact on a sensitive part of the network.

Impacts in Coltishall have been considered in detail and the impacts of growth of 2000 homes in North Walsham has been modelled. The draft TA has recognised that there will be impacts on the B1150 and mitigation of these is required. Two specific interventions have been identified, the provision of a right turn lane from the B1150 to the B1354 just north of the bridge and formalised marking out of a bus stop on the B1150 adjacent to the war memorial in the Norwich bound direction.

The evidence shows that appropriate schemes can be delivered to mitigate the impacts of the allocation on the B1150 through Coltishall. To test deliverability these measures have been looked at in detail and proposed solutions have been subject to safety audit.

Because of the importance of the need to bring forward improvement in Coltishall to cater for additional traffic, the highway authority would want to see policy NW62/A amended to specifically require the identified highway mitigation. Furthermore, it is recognised that as a result of the increased traffic through the village improvements need to be made for pedestrians including delivery of a crossing point. At this time there is no specific scheme promoted but given that this is an allocation it is not considered that a scheme needs to be tabled at this time as it is reasonable to conclude that a suitable scheme can be delivered. To ensure that this issue is properly tackled, and a scheme brought forward as part of any planning application, the allocation policy needs to include a specific requirement to provide pedestrian enhancements and a crossing facility of the B1150 in the centre of the village of Coltishall.

Given the sensitive nature of this part of the network and to consider the impacts of construction traffic associated with the proposed allocation, the highway mitigation measures in Coltishall should be delivered prior to commencement of development on the allocation.

The highway authority wishes to continue to work with North Norfolk District Council, the site promoter, and Broadland District Council to secure the highway requirements in policy NW62/A and prepare a statement of common ground for presentation at the forthcoming examination in public of the North Norfolk Local Plan.

Regards

Richard

Richard Doleman, Strategic Transport

Growth and Investment

Tel: 01603 223263 | Dept: 0344 800 8020 | Mobile: 07733 014502

richard.doleman@norfolk.gov.uk

County Hall, Martineau Lane, Norwich, NR1 2DH



--

To see our email disclaimer click here <http://www.norfolk.gov.uk/emaildisclaimer>

APPENDIX 3

NCC POSITION STATEMENT ON CURRENT STATUS OF B1150 THROUGH COLTISHALL – DECEMBER 2023

Sarah Hornbrook

From: Richard Doleman <richard.doleman@norfolk.gov.uk>
Sent: 13 December 2023 09:26
To: Mark Ashwell
Cc: David Cumming; David Wilson - ETD; Liz Poole; Carey, Bevin; Sarah Hornbrook; Kevin Allen; Timothy Young
Subject: B1150 Coltishall

Mark

Further to our discussions regarding the proposed allocation in North Walsham as set out in policy NW62/A, below is a position statement from the Highway Authority on the current status of the B1150 through Coltishall.

The B1150 is Main Distributor Route in the Norfolk Route hierarchy connecting Norwich to the market town of North Walsham, Main Distributors form important cross county links for all traffic types. The B1150 also provides a strategic link from Local Access Routes that serve surrounding parishes. The traffic survey on the B1150 at High Street, Coltishall taken for the Transport Assessment indicated a 2-way average traffic flow of around 10,000 vehicles/day of which around 3% were Heavy Goods Vehicles. The traffic volume and HGV mix on the B1150 is in line with other B roads in Norfolk that serve similar strategic function. The B1150 is also an important seasonal corridor connecting the strategic road network to North Norfolk and the Broads National Park. It also offers an alternative route to long vehicles that need to avoid the humped back River Bure bridge on the A1151 at Wroxham.

Four personal injury accidents have been recorded over the 2.3km length of the B1150 passing through the parish of Coltishall in the last 3 years (1 fatal, 2 serious, 1 slight). Two occurred within the built-up village and two (including the fatality) on the 60mph section of the B1150 to the northeast. The fatality involved a pedal cyclist colliding with the rear of a stopped vehicle. There are no 'accident cluster sites' within Coltishall and given the traffic flow on the B1150, accidents are not at a level where Norfolk County Council would look to intervene with a Local Safety Scheme.

Nine personal injury accidents have been recorded on the 3.5km section of the B1150 passing through Horstead with Stanninghall Parish (2 serious, 7 slight). Four slight accidents occurred in the built-up village. Two serious and 3 slight accidents occurred in the more rural 50 and 60mph sections south to Crostwick. Accidents are generally scattered with no accident 'cluster sites' warranting further investigation.

Norfolk County Council will continue to monitor the accident record at Coltishall and Horstead and will take further action as required.

Coltishall Parish Council have recently commissioned a pedestrian crossing assessment on the B1150 at High Street, Coltishall to investigate whether improvements to pedestrian crossing facilities are viable. The study is anticipated to be completed in early 2024. There is also local concern about the speed of traffic entering the village from the north on the B1150. Several speed management measures have been installed in the past, including village gateway signing and vehicle activated signs. A future development proposal is conditioned to provide a pedestrian refuge island and further speed management measures to calm traffic and aid pedestrian crossing movements.

Regards

Richard

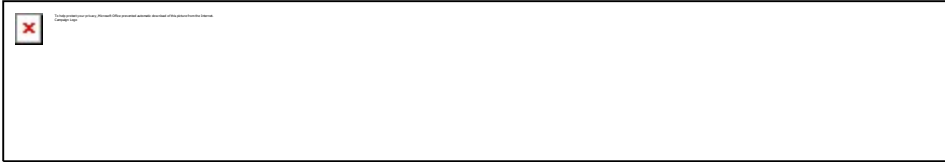
Richard Doleman, Strategic Transport

Growth and Investment

Tel: 01603 223263 | Dept: 0344 800 8020 | Mobile: 07733 014502

richard.doleman@norfolk.gov.uk

County Hall, Martineau Lane, Norwich, NR1 2DH



--

To see our email disclaimer click here <http://www.norfolk.gov.uk/emaildisclaimer>

APPENDIX 4

PROPOSED POLICY WORDING

NW62/A – SUGGESTED POLICY WORDING

Land West of North Walsham

Land to the west of North Walsham to provide a mixed-use sustainable urban extension amounting to 108 hectares, as defined on the Policies Map, is allocated for approximately 1,800 dwellings, 7 hectares of employment land, green infrastructure, community facilities and a road linking Norwich Road and Cromer Road

Planning permission will be granted subject to compliance with the relevant policies of this Plan and, where practical and feasible, the following site specific requirements:

1. A comprehensive Development Brief incorporating a site wide Vision and Master Plan demonstrating how the development will respond to the particular characteristics of the site and detailing the delivery of all of the uses and infrastructure required in this policy, will be submitted with the first planning application for the site. The Development Brief and Vision and Masterplan, which will be approved before the determination of the first application, shall inform any further applications for the site.
2. A site wide Design Code to complement the Development Brief detailing the design principles for all development and land uses will be submitted with the first planning application for the site. The Design Code, which will be approved before the determination of the first application, shall inform any further applications for the site.

Green infrastructure

3. A Green Infrastructure Strategy detailing the delivery of the green infrastructure including new areas of open spaces, play areas, sports pitches, strategic landscaping and green corridors, will be submitted with the first planning application for the site. The Green Infrastructure Strategy, which will be approved before the determination of the first application, shall inform any further applications for the site.

The Green Infrastructure Strategy should complement principles in the Design Code and Drainage Strategy and will be informed by discussions with consultees to ensure it reflects need and demand. Delivery of on-site green infrastructure should provide the opportunity to contribute towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS);

4. Development proposals will provide the following green infrastructure:
 - v. approximately 17 hectares of new public open space including a new 'town park' of approximately 2ha, new sports pitches of approximately 2ha and a minimum of 2.4ha of allotments, or, where appropriate and informed by discussions with relevant stakeholders, qualitative improvements considered to be of equivalent value;
 - vi. a substantial area of strategic green infrastructure of approximately 10ha to the south and western countryside edge of the development to create a new green edge of the town;
 - vii. enhancement of the Weavers Way corridor acting as a green access spine through the development including improving biodiversity along the corridor. It will provide a pedestrian & cycle crossing point across the link road that prioritises these uses over vehicle traffic;
 - viii. a new green corridor which will traverse north to south through the development providing an access and biodiversity corridor;
-

Environmental Mitigation

5. A Drainage Strategy detailing the delivery of sustainable drainage and flood mitigation & storage measures that will be integral to the urban development and green infrastructure, including using surface water runoff as a resource that contributes to water sensitive urban design (WSUD) and integrating the water cycle within the built and green environment, will be submitted with the first planning application for the site. The Drainage Strategy, which will be approved before the determination of the first application, shall inform any further applications for the site.
6. Proposals should appropriately use design, layout and landscaping to preserve and, where opportunities arise, enhance heritage assets and their settings including designated and non-designated heritage assets including the 'Battlefield Site'. This should include a design, layout and landscaping that protects the Listed Buildings at Bradmoor Farm;
7. Retain and enhance existing hedgerows and trees within the site, where possible. Landscape buffers and/or green corridors will, where appropriate, be provided along the existing urban edge of the town to protect the amenity of existing residential areas, and along Weaver's Way and the northernmost boundary.

Sustainable Transport

8. A Transport Assessment, the scope of which is to be agreed with the Local Highway Authority, will be undertaken to identify appropriate off-site highway mitigation measures. These should include, but are not limited to:
 - Traffic management measures and capacity improvements on the B1150 at Coltishall and Horstead;
 - Pedestrian safety improvements at Coltishall and Horstead to be agreed with the Highway Authority, which may include works at Ling Way, High Street and the B1150/ Mill Road/ B1354 junction;
 - Improvements to the signalised junction at Norwich Road, North Walsham;Measures to discourage the use of Aylsham Road and Skeyton Road, North Walsham by motor vehicles.
 9. The agreed off-site highway mitigation measures will be delivered in accordance with a Phasing and Delivery Plan that will be agreed as part of the first planning application for the site. Any mitigation measures required at Coltishall and Horstead will be delivered at the earliest possible opportunity to mitigate construction impacts.
 10. Delivery of a new road designed as an attractive main residential street through the development with mixed-use frontage usages and segregated cycle paths and footways. This new road should be suitable for HGV traffic (including high sided vehicles) and will connect Norwich Road to Cromer Road. It should be delivered at the earliest opportunity, in accordance with a phasing plan agreed as part of the first Planning Application;
 11. Prior to any development to the north of the railway line, assessment of the impacts of this development on the railway bridge, will be required, and any mitigation measures identified and delivered as appropriate;
 12. Provision of a network of interconnected streets, squares, green corridors and public spaces which prioritise moving around on foot and by cycle over the use of private motor vehicles;
-

13. Delivery of appropriate public transport measures on site providing facilities and regular services to/from the town and key services;
14. Provision of off-site pedestrian and cycle route improvements to the town centre, key services and railway station;

Community Facilities & Employment

15. Provision of community facilities including approximately 2.5ha of land for a new 2 form entry primary school focused in a broadly central location within the development, a local centre providing options for local convenience retail and health services and other community uses;
16. Options for the enhancement of facilities at North Walsham Football Club should be considered in line with local and national standards and guidance from Sport England and other sports bodies, as part of the wider Green Infrastructure strategy for the site;
17. Delivery of approximately 7 hectares of employment land located to the north of the allocation site in the Cromer Road/Bradfield Road area, reflecting the prevailing character of the town and recent development provided with direct access from the new link road and major road network.

New Homes

18. Delivery of approximately 1,800 homes built with a mix of dwelling types, sizes and tenures in accordance with Policy HOU2 of this Plan. A range of densities and layouts will provide variety within the scheme in line with the approved Design Code.

Mineral Safeguarding

19. The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority
-

SUGGESTED EXPLANATORY TEXT

Description

14.3.1 North Walsham West covers a significant area of land that stretches from the railway line to the north west of the town, across arable land - around the west of the town, to Norwich Road to the south. The suggested development area covers a total of 108 hectares and would envelop Link Road, Greens Road, Aylsham Road, Tungate Road and Skeyton Road.

14.3.2 In the 2018 Landscape Character Assessment the whole of the site is within the landscape type characterised as 'Low Plains Farmland'. The Low Plains Farmland Type is flat or gently undulating open landscape with long, uninterrupted views, predominantly arable land use and dispersed rural settlements.. It is not identified as a landscape type which is more sensitive to the impacts of development and is not subject to any local or national landscape designations.

14.3.3 It is proposed that North Walsham West would deliver the following:

- approximately 1,800 dwellings;
- a western link road - linking Cromer Road to Norwich Road
- 7 hectares of serviced employment land;
- Land for a new 2 form entry primary school, of approximately 2.5ha – the precise requirement will be agreed at planning application stage through discussions with Norfolk County Council;
- significant areas of landscaping and public open space;
- other required infrastructure, improvements and mitigation including, but not limited to, health services, drainage and power.

Constraints

14.3.4 Development proposals will need to take into account:

- A Transport Assessment will be required that will explore the benefits of the western link road and the impacts (with mitigation required) on the surrounding network including the route to Norwich via Coltishall. The Transport Assessment should include an assessment of walking and cycling routes and a comprehensive strategy to promote walking and cycling and other modes of sustainable transport.
- The link road will be designed to facilitate future northern and southern connections, should these be progressed at a later date.
- The site has a number of public rights of way running through it, including the Weaver's Way. These will need to be retained and enhanced as part of any proposal.
- There is limited surface water drainage capacity to the west of North Walsham. A comprehensive SUDs scheme will be required.
- Development of the scale proposed will require comprehensive infrastructure enhancements including, but not limit to, education, health and community facilities.
- Proposals will need to provide for the retention and potential expansion of North Walsham Football Club.

Deliverability

14.3.5 The delivery of the site will be complex and may take a number of years to come to fruition. The majority of the site is currently being promoted for development by a single consortium comprising three separate land owners.

14.3.6 In 2021 the Planning Authority began work on the preparation of a Development Brief for the site and consulted the local community and other stakeholders on an overarching Vision for the development and a set of high level principles. The feedback has informed the policy below and will provide the basis for the preparation of a detailed Development Brief for the site which will be subject to further public consultation. The site (in part or whole) cannot be brought forward without the prior approval of a comprehensive Development Brief and approval of a Design Code for the whole site; this means that a decision on any planning application cannot be made until the Development Brief and Design Code have been approved.

APPENDIX 5

ANGLIAN WATER COMMENTS ON DRAFT DEVELOPMENT BRIEF



Anglian Water Consultation Response

North Walsham West Development Brief Consultation

1. Anglian Water

- 1.1. Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea.
- 1.2. Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.
- 1.3. Anglian Water is the statutory water and sewerage undertaker for North Norfolk and a statutory consultee under The Town and Country Planning (Local Planning) (England) Regulations 2012. Anglian Water wants to proactively engage with the development brief for the proposed sustainable urban extension (in the submitted Local Plan for North Norfolk) to ensure it delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.

2. Commentary on the Development Brief

- 2.1. The following comments are made in relation to ensuring the development brief for the North Walsham West sustainable urban extension contributes to sustainable development and has regard to assets owned and managed by Anglian Water.

Overview

- 2.2. Anglian Water is supportive of a landscape-led approach to the overall design that is framed by a strong green infrastructure network informed by environmental/natural assets present on the site, which helps to assimilate biodiversity net gains and positive benefits for surface water management.

Sustainability

- 2.3. Anglian Water welcomes the stated aspiration for the development to embrace sustainability, and the Vision sets out how this should be achieved. We consider that the development brief could be more ambitious particularly in terms of climate change impacts and the need for new development to be climate resilient. We would particularly welcome greater value being placed on natural resources including water, and how the design layout and green (and blue) infrastructure can be effectively utilised to use water more efficiently.



Statutory Utilities, Services and Capacity:

- 2.4. Anglian Water welcomes reference to our infrastructure on page 41 of the Development Brief, and we can confirm that we have been engaged with the site promoter regarding the following matters:
- 2.5. **Wastewater:** Anglian Water has been working actively with the consortium in developing a foul drainage strategy, which has included hydraulic modelling scenarios for various infrastructure point of connections etc. The base line strategy is to construct an on-site terminal pumping station and lay a rising main conveyance around the north of North Walsham to connect into an appropriately sized foul sewer upstream of the North Walsham water recycling centre. Our pre-development engagement with the consortium is continuing.
- 2.6. **Water supply network capacity:** we have also confirmed that the water supply to the proposed development site can be provided from the existing mains supply network. Anglian Water cannot reserve capacity and therefore the consortium has been recommended to formally apply for a connection at their earliest convenience as available capacity in our network can be reduced at any time due to increased requirements from existing businesses and houses as well as from new housing and new commercial developments. This will also allow us to design and plan the delivery of the connection and ascertain if any offsite reinforcement work is required.

Flood Risk and Drainage:

- 2.7. **Source Protection Zones (SPZs):** We have engaged with the developer early on with this development including meeting on site to discuss the protective measures required. As stated in the development brief there is a groundwater adit running beneath the land proposed for development and a borehole - with a 22m easement around the adit identified in the draft development brief. We note that the concept plans show an area of green space along its length, which we support. This easement around the adit and the borehole should enable access and space for a crane, if required for borehole maintenance.
- 2.8. The development brief suggests that the SPZs may "*constrain the use of infiltration drainage within them subject to further discussion with the Environment Agency*". As Anglian Water abstracts water from the borehole on the site, we recommend that the development brief also includes reference to consultation with Anglian Water around any proposed SuDS infiltration plans within the SPZ. We are aware that the geology in this area is drift cover with successive layers of clays, sand and gravels, which are contorted and may impact on infiltration drainage. It would be our preference, given the proximity to our abstraction borehole, that infiltration drainage is restricted within the SPZs, and we would welcome further detailed design at the appropriate stage. There are certain SuDS features that can be included to reduce the risk of pollutants entering the groundwater from run-off such as filter strips, wetlands and ponds.

Sustainable Drainage Systems:

- 2.9. We note the sustainable drainage systems (SuDS) strategy on page 63 and the proposed use of infiltration as the primary method of discharge. We welcome an approach which prioritises SuDS to manage surface water run-off across the site, and integration with green infrastructure across the site to maximise the benefits that can be achieved for biodiversity and local amenity. We would however reiterate our concern regarding infiltration within the SPZs and utilising appropriate SuDS features within this area of the site.



2.10. In addition, SuDS also provide an opportunity for integrated water management measures to be introduced to reduce potable water use in homes across the site through opportunities for rainwater/stormwater harvesting and reuse e.g. for irrigation and flushing toilets. Such measures help to achieve benefits for reducing potable water use across the site particularly when also aligned with more water efficient fixtures and fittings. Norfolk is within a region identified seriously water stressed, and therefore we would welcome measures that exemplify the sustainable use of water resources across the site. This would align with the policy requirement to integrate the water cycle within the built and green environment as set out in the Policy Response Table (page 101).

Employment: Key Principles

2.11. It is noted that the employment uses are wide ranging across the site. We would welcome key principles also including integrated water management such as rainwater harvesting given the considerable potential larger employment buildings will have to collect and reuse rainwater and improve their water efficiency. Any B2 use (general industry) that is likely to require significant non-domestic water supplies for manufacturing or processing should engage with Anglian Water at the earliest opportunity.

Tree Species Selection (pg. 95)

- 2.12. Anglian Water agrees that tree planting can help integrate the natural environment with the built form. Street trees provide multi-functional benefits, particularly in urban areas, however, they should be designed to take account of minimising impacts on underground utilities such as water mains and sewers - particularly where street trees are planted where there are existing utilities across the site.
- 2.13. For trees to thrive they need space for root development in the underlying soil, which must be of sufficient capacity to accommodate the rooting habits of the particular species, without impacting on the functioning of our underground assets. A sewer or lateral drain should not be located closer to trees/bushes/shrubs than the canopy width at mature height, except where special protection measures are provided - such as use of appropriate barriers to resist root ingress to the sewer system. A tree should not be planted directly over sewers or where excavation onto the sewer would require removal of the tree. To minimise the risk of root damage, tree planting should provide good growing conditions. Guidance can be found in 'Trees in Hard Landscapes: A Guide for Delivery'

3. Conclusion

3.1. Anglian Water welcomes the opportunity to comment on the North Walsham West Development Brief and note that some aspects of our comments may also be relevant to the site wide Design Code. However, we see merit in raising some of these matters at this stage so they can be appropriately referenced within one or both documents.

APPENDIX 6
NCC COMMENTS ON DRAFT
DEVELOPMENT BRIEF



Norfolk County Council

Norfolk County Council Comments on the: North Walsham West Draft Development Brief 27 October 2023

1. **Introduction and over-arching strategic comments**
 - 1.1. Norfolk County Council welcomes the opportunity to comment on the Initial Consultation relating to the preparation of a Development Brief for the above Site. The officer-level comments below are made on a without prejudice basis and the County Council reserves the right to make further additional comments on any subsequent stages of the Development Brief and/or any planning application/s on the above site.
 - 1.2. The County Council welcomes the draft Vision for North Walsham West, which is considered to be sustainable providing not just homes, but also employment opportunities, open space, the necessary supporting infrastructure, and services.
2. **Community Facilities and Infrastructure Delivery**
 - 2.1. The County welcomes the draft aims set out in the above consultation document. In particular there is support for the need for a new primary sector school accompanying the proposed development of 1,800 dwellings. This scale of growth cannot be accommodated within the existing primary sector schools in the town; and as such a new school will be required. Land will be needed for a new school for capacity of at least 2 forms of entry (2FE) (420 places). The County Council supports the proposal of a 2FE primary school within this site. The site location will need to be agreed by the local education authority; and be fully serviced and accessible when transferred to the County Council (trigger for transfer of the school site to the County Council to be agreed). The funding of the school will be expected from the developer and will be secured through a S106 agreement; and this will include the free transfer of land for the school to the County Council.
 - 2.2. In addition, other community infrastructure will be required including improvements to the existing library facility. As with education provision this will need to be developer funded and secured through a S106 agreement.
 - 2.3. Any developer contributions and/or planning conditions will need to accord with the County Council's [Planning Obligations Standards](#).
 - 2.4. Should you have any queries with the above comments please contact Naomi Chamberlain (Senior Planner) at naomi.chamberlain@norfolk.gov.uk or call 01603 638422.

3. Energy

- 3.1. Quality Of Life Focused section page 54 within section 7 vision & key principles - The County Council supports the prioritisation of energy efficiency across all dwellings through design, construction, and renewable energy systems such as solar water heating and solar electricity. The County Council [Local Energy Asset Representation](#) has mapped energy demands, energy networks and embedded generation which could be used to inform the development brief. More detailed maps can be provided, and we also suggest making contact with the Greater South East Net Zero Hub who will be able to assist in identifying solutions that support low carbon development.
- 3.2. Should you have any queries with the above comments please contact Laura Waters (Strategic Planning Team Manager) at laura.waters@norfolk.gov.uk or call 01603 638038.

4. Natural Environment

- 4.1. It will be important that the proposed residential development fully meets the requirements set out in the Norfolk Green Infrastructure & Recreational impact Avoidance and Mitigation Strategy (GIRAMS) to ensure Norfolk's Habitats Sites are not adversely impacted by this proposal.
- 4.2. Impacts to statutory and non-statutory wildlife sites (such as the Weaver's Way County Wildlife Site) should be carefully avoided and adequately buffered via a well-designed green infrastructure strategy.
- 4.3. The development will be expected to achieve a minimum 10% net gain in biodiversity (as recognised in the Ecology section of 6. Site Analysis). This should preferably be delivered onsite, within the red line boundary.
- 4.4. Full ecological and detailed protected species surveys should be completed prior to the submission of any future planning application. The early identification of trees with bat roost potential is noted, which appear to be broadly incorporated within areas of proposed green infrastructure provision.
- 4.5. Should you have any queries with the above comments please contact James Fisher (Principal Ecologist (Delivery)) at james.fisher@norfolk.gov.uk.

5. Historic Environment

- 5.1. An archaeological geophysical survey has already been done (although the County Council is waiting for amendments to the report) for the area covered by the Development Brief, which has revealed areas of probable medieval settlement, several probable prehistoric burial mounds including a probable Neolithic long barrow, field systems, a trackway, and other features. These results were not mentioned or considered within the development brief as they could have an impact upon the development proposals.

5.2. Should you have any queries with the above comments please contact Steve Hickling (Historic Environment Officer) at steve.hickling@norfolk.gov.uk.

6. **Lead Local Flood Authority**

- 6.1. The Lead Local Flood Authority (LLFA) has reviewed the high-level development brief and notes that a limited flood risk summary is provided that focuses on fluvial and surface water flood risk. The development brief also confirms that sustainable drainage system are proposed for use. It is noted that the development is proposing to use infiltration basins although there is no evidence that infiltration is feasible.
- 6.2. The LLFA notes the proposed site is located at the head of several catchments in the local area, two of which contains the town of North Walsham. The LLFA confirms that the Water Management Alliance has some responsibilities for watercourses to the west of the proposed development boundary but none onsite. Therefore, the ordinary watercourses on site are likely to be in the jurisdiction of the LLFA for ordinary watercourse consenting purposes.
- 6.3. The Environment Agency risk of surface water flood mapping identifies a number of flow paths follow transport routes around the site and that lead through North Walsham. There are also a number of areas where surface water pools on the proposed development site or adjacent to its proposed boundaries. These surface water flow paths are associated with a number of historic surface water flood incidents within the town downstream of the proposed development site. The proposed development is located within this catchment area, however, there is no indication of consideration having been given to providing betterment in the surface water management strategy to assist in the reduction of surface water flooding within the existing urban area.
- 6.4. In addition, there is no indication of further consideration that should be given to the potential opportunities available to integrate surface water management features into the existing town where highways improvements are to be made as these are frequently located in existing flow paths. Further consideration by the developers to improve the management of surface water flow paths within the town to benefit the wider community that could potentially include the reuse of surface water runoff in a constructive manner would be supportive to the principles of holistic water management and in accordance with the LLFA's Developer Guidance.
- 6.5. As there are minimal details of the scheme available at present, the LLFA would expect to receive, as a minimum, the information outlined below in any future planning application. However, this is not an exhaustive list and the LLFA guidance should be reviewed and referred to along with other appropriate guidance documents.

- A flood risk assessment that assess all sources of flooding including appropriate fluvial and surface water flood modelling (pre and post development scenario).
- Appropriate mitigation for any works occurring in areas at risk of flooding, including compensatory storage for fluvial flooding or additional attenuation for surface water flooding originating offsite or ensuring that surface water flooding / drainage channels are routed through/around the development without adverse impacts (e.g., dry culverts)
- Drainage strategy and subsequent detailed information that includes:
 - Evidence the SuDS hierarchy has been followed including infiltration testing to confirm if infiltration drainage is favourable or not, prior to proposing discharge elsewhere. Deep infiltration systems would require a significant amount of pre application evidence and agreement with the LLFA and Environment Agency.
 - SuDS hierarchy has been followed to integrate the installation of small source control SuDS within the large site or regional based SuDS.
 - SuDS attenuation for runoff and volume equivalent to greenfield pre-development, to prevent an increase of flood risk post development. If any brownfield drainage is assumed this must return as close to greenfield as possible and be evidenced as to why this is not possible. Considering the size and nature of the scheme on a predominately greenfield site, we would expect any brownfield runoff to be returned to pre-development greenfield runoff.
 - As the proposed site is located across the head of possibly more than one catchment, any future design should seek to prevent the transfer of water between these catchments as to do so is likely to increase flood risk elsewhere.
 - Inclusion of appropriate climate change allowances, for rainfall calculations this would include 45% climate change.
 - The use of infiltration as a method of surface water discharge is prioritised in the discharge hierarchy. However, infiltration testing to be undertaken in accordance with BRE 365 or equivalent (as in the LLFA Developer Guidance) in areas of the site where infiltration structures are proposed.
 - Regard should be given to any embanked carriageways and toe of the embankments where they connect to existing road features. In addition, initially it should be considered that embankments are impermeable areas due to the structure being engineered reducing the infiltration potential. This is to ensure that suitable provision for the surface water attenuation is planned for.
 - The SuDS components will use open shallow features where possible within the management train (source, site and regional control) to address flood risk and water quality mitigation while enhancing biodiversity and amenity required from the new development. We would not advise the reliance on proprietary treatment systems (some consideration could be used where an additional step of treatment may be required for sensitive receptors).

- Details of any temporary works to mitigate additional runoff during the construction phase and consideration of the phasing of the development construction. We would like to see that adequate measures are put in place to minimise temporary additional runoff which may cause flooding and that this is diverted away from or pre-treated before discharge to the final drainage scheme. This would be to minimise siltation, sediment movement and blockage of newly created drainage infrastructure and ensure it performs as designed.
- A maintenance and management plan detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for the lifetime of the development. This would include appropriate easements by the adopting authorities.
- Any formal or informal drainage associated with existing developments or farmland should be maintained or diverted by the scheme to avoid future ponding against any embankments or within cuttings that may be created.

6.6. The development proposals will show how multifunctional SuDS could be provided, linking to landscape and biodiversity benefits, as there is the opportunity to mitigate other impacts of a development. If there are opportunities to improve existing flooding in the area, these should be investigated, and options scoped in consultation with the LLFA and Environment Agency.

6.7. Please note, as there are works proposed as part of this application that are likely to affect flows in an ordinary watercourse, then the applicant will need the approval of the LLFA (Norfolk County Council). This approval is separate from planning approval and would be required prior to any temporary works and permanent works starting on site. Any ordinary watercourse consent application would need to show how the flow in the watercourse will be maintained and how flood risk will not be increased elsewhere. It would be supported by the relevant documents and technical drawings.

6.8. The LLFA developer guidance can be obtained on request by contacting the LLFA. [Further information for developers can be found on here.](#)

6.9. It is possible that additional comments could be requested in the future and would be dependent upon the information provided.

6.10. Should you have any queries with the above comments please contact the Lead Local Flood Authority at llfa@norfolk.gov.uk.

7. Minerals and Waste

- 7.1. Norfolk County Council as the Minerals and Waste Planning Authority has the following comments to make on the North Walsham West Draft Development Brief.
- 7.2. We are pleased that the Development Brief recognises on page 19 that the site is underlain by a defined Minerals Safeguarding Area for sand and gravel and that any future development on the site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 or any successor policy.
- 7.3. A duty is placed upon Local Planning Authorities to ensure that mineral resources are not needlessly sterilised, as stated in National Planning Policy Framework (2023) paragraph 210, and 'A Guide to Mineral Safeguarding in England' published jointly by DCLG and the BGS. Paragraph 212 of the NPPF (2023) states that "Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working".
- 7.4. This is a large-scale development which will take a number of years to build out. Therefore, at the Development Brief stage, it would be beneficial to consider how the prior extraction of sand and gravel from the site will be planned into the phasing and design of the site and currently this opportunity has not been explored in the Development Brief. For example, there may be opportunities for the sand and gravel from on-site resources to be used in the construction phases of developments. This will improve the sustainability of the project by:
 - reducing the need to extract aggregate from other locations,
 - reducing the carbon cost of the project by reducing the quantity of aggregate needing to be transported to the site,
 - reducing the quantities of material removed from the site as part of the groundworks operations; and
 - ensuring that resources in other areas are not unnecessarily extracted, so that they can be available to sustain future growth.
- 7.5. There are also opportunities on restoration for areas in which mineral has been extracted to form part of sustainable drainage systems, flood storage area, areas for recreation/open space, and/or renewable energy schemes, such as ground source heat pumps.
- 7.6. Norfolk County Council as the Mineral Planning Authority for Norfolk have produced standing advice for the landowners, developers, agents and Local Planning Authorities regarding sand and gravel safeguarding. This can be found on the [Norfolk County Council website](#) on the 'Adopted policy documents' page.

7.7. Should you have any queries with the above comments please contact Caroline Jeffrey (Principal Planner, Minerals and Waste Policy) at caroline.jeffery@norfolk.gov.uk.

8. Public Health

8.1. Public Health welcomes the reference to the Green Infrastructure and the opportunities for healthy lifestyles through providing pedestrian and cycle priority throughout the development.

8.2. Public Health also notes that the development brief has addressed the issue of promoting health issues through lifetime homes that was raised by Public Health during the previous consultation.

8.3. However, there is the opportunity in the Draft Design Guide of the Design Quality Section to emphasise the promotion of healthy lifestyles through good design of proposed housing in the new development. Examples of best practice can be drawn from the [Building for a Healthy Life Tool Kit](#), the [National Design Guide \(homes & buildings section\)](#) and [NHS England's Putting Health into Place](#).

8.4. The District Council should consider the need for a full Health Impact Assessment (HIA) in support of any future development proposal/s on the site in line with the County-wide Health Protocol [May 2022] as adopted by North Norfolk District Council.

8.5. Should you have any queries with the above comments please contact phplanning@norfolk.gov.uk

9. Transport

9.1. In general, the development brief sets out an approach to promoting active travel and public transport for the proposed allocation to make it well connected with North Walsham and this approach is supported.

9.2. At the time of writing the County Council has received a draft of the transport assessment (TA) that will look at the transport aspects of the proposals in more detail. The comments on the development brief are made without reference to the TA as that is still work in progress.

9.3. Page 15 - The 15-minute neighbourhood ethos is understood, and it can bring benefits with well-connected places. It should be noted that in the Government's 30-point plan for drivers, one of the points is **Stop local authorities using so-called "15-minute cities" to police people's lives**, and there will be a consultation on the enforcement powers.

9.4. Page 18 - The first point under the Sustainable Transport heading (para 8) refers to a TA. A TA is required to determine the appropriate mitigation and

interventions required to meet the transport impacts and needs of the proposed allocation for all modes of travel. All subsequent Sustainable Transport points (paras 9-13) will be informed by the findings of the TA.

- 9.5. Pages 64-71 - Overall, the approach to integrating land use and transport is welcomed with the ambition to make this a functioning urban extension of North Walsham with an emphasis on active travel and public transport that is in line with our current Local Transport Plan.
- 9.6. Public Transport - The principles of improved public transport connectivity are welcomed. The location of bus stops and interchange will need to be determined through the TA and discussion with the public transport authority and operators.
- 9.7. The nature and impact of the proposed link road will be determined by the TA.
- 9.8. The Transport hub is welcomed, and its location and scale will be determined through the TA consideration of public transport.
- 9.9. Materials and landscaping within the current and proposed highway will need to be agreed with the Highway Authority. As a starting point all planting and landscaped areas should be outside the adopted highway and have a suitable management regime.
- 9.10. Page 78 – Street typologies will need to be developed in line with the County Council's current guidance.
- 9.11. Should you have any queries with the above comments please contact Richard Doleman (Principal Infrastructure Development Planner) at richard.doleman@norfolk.gov.uk.

10. **Waste Infrastructure**

10.1. A new recycling centre is required in the area, North Walsham West is a potential location that the County Council is assessing the suitability for housing a new recycling centre. Norfolk County Council is recommending a land search for potential sites for a new recycling centre.

10.2. The following criteria is followed to set out the search area:

- Land around 4000m²
- Access suitable for HGVs, articulated lorries and for visitor numbers (good link to A roads). New style sites can expect up to 600 vehicles per day and a new site should have capacity to accommodate increased visitor numbers.
- Well related/ in close proximity to urban areas.

- Waste Sites are acceptable (in planning terms) on land already in waste management use, existing industrial/ employment land, other previously developed land or contaminated/ derelict land.
- Land available for access 7 days a week (RC opening hours between 9am and 4pm, with servicing from 7am, but access should not be restricted to these times as hours may be reviewed in the future).
- Green field sites could be considered if part of a development of the nature proposed.

10.3. Should you have any queries with the above comments please contact Peter Barnes (Waste Infrastructure Manager) at peter.barnes@norfolk.gov.uk.

APPENDIX 7

HISTORIC ENGLAND COMMENTS ON DRAFT DEVELOPMENT BRIEF



Mark Ashwell
Planning Policy Manager
North Norfolk District Council
planningpolicy@north-norfolk.gov.uk

Our ref: PL00582365

16 October 2023

Dear Mr Ashwell

North Walsham West – Draft Development Brief October 2023

Thank you for consulting Historic England on the North Walsham West development, Draft Development Brief. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process. Therefore, we welcome the opportunity to comment on the consultation material. We have now had the opportunity to review the documents and can provide the following substantive comments.

The market town of North Walsham dates from the sixth century AD. During the fourteenth century, the wool weaving industry thrived, bringing wealth which led to the construction of the vast Church of Saint Nicholas. A charter for a weekly market was also granted at this time. In 1600, a devastating fire destroyed many buildings, but the town was rebuilt soon after. Today, the historic high street is undergoing further renewal and regeneration having been designated a High Street Heritage Action Zone by Historic England.

The emerging Development Brief for North Walsham West relates to a strategic development site for 1800 homes on the western edge of the town. Whilst there are no designated heritage assets within the site, there are three grade II listed buildings to the west of the site at Bradmoor Farm (the farmhouse and two barns) and Stump Cross/Wayside Cross which lies to the east of the site and is a scheduled monument





and grade II listed. There are other nearby crosses, also listed at grade II and scheduled.

Historic England made comments on this site at the Regulation 18 and 19 Local Plan Consultations as well as on the Initial Consultation in relation to this specific site in 2021. We have had further correspondence with the Authority in relation to the battlefield.

North Norfolk have prepared a Heritage Impact Assessment of the site. This assessment made several important recommendations for the site which are relevant to the development of the masterplan and development brief.

Comments on the Consultation material

3. Vision

Whilst we welcome reference to ‘high environmental standards’, there is no specific reference in the vision to the historic environment or the importance of the new community drawing on local character and distinctiveness. We strongly advise that these goals should be incorporated into the vision.

P14 The Value of Placemaking

Again, although the third paragraph hints at it (‘the protection and enhancement of existing assets or features’), there is no specific mention of the historic environment or heritage within this section. We recommend that reference is made on this page to the important role that contextual led planning, drawing upon the historic environment, local character and distinctiveness and sense of place, can make in shaping new development.

4. Policy Context

P16

We welcome the references to the NPPF and National Design Code. NPPF – update to 2023.

We recommend including reference to the [National design guide.pdf](#) ([publishing.service.gov.uk](#)) 2021.

P20

We welcome the reference to the historic environment on page 20.





5. Context

P29 Site History

This section should specifically mention the nearby designated heritage assets. These include Bradmoor Farmhouse and two barns all listed at grade II, as well as Stump Cross, also listed at grade II and a scheduled monument. Monument Cottage lies to the south of Stump Cross and is grade II listed whilst another cross, close to Tollgate Farm, is also both scheduled and grade II listed. Still further south lies another grade II listed thatched cottage and another scheduled cross. These assets should be specifically mentioned in the text.

P30/31 Built Form Analysis

We welcome the reference to built-form, local vernacular and materials. We welcome the subdivision of the surrounding area into north, south and central.

P32/33 Landscape Character

We welcome the reference to national and regional landscape character on pages 32 and 33.

P40 Formal Protections and Designations

We welcome reference to the Conservation area and concentration of listed buildings in the text, together with the specific reference to Bradmoor Farmhouse and the two Barns. Paragraph 3 should state that these are grade II listed buildings.

Whilst stump Cross is mentioned, the text should state that this is also listed at grade II and a scheduled monument. Monument Cottage lies to the south of Stump Cross and is grade II listed whilst another cross, close to Tollgate Farm, is also both scheduled and grade II listed. Still further south lies another grade II listed thatched cottage and another scheduled cross. These assets should be specifically mentioned in the text.

We welcome the inclusion of the designations map. However, the map should also include the scheduled monuments (both the locations and the key).

6. Site Analysis

P42 Last bullet point

The text should also mention the barns, the other nearby listed buildings and the scheduled monuments. The last sentence should read protected and enhanced (rather than retained) in line with the NPPF.





P45 Views

We welcome the reference to key views of the church.

7. Vision and Key Principles

P54 Framework Masterplan

The Heritage Impact Assessment for the site recommended open space and landscape buffer around Bradmoor Farm to retain where possible the sense of an isolated farm holding. The Framework masterplan includes some landscaping along the boundary with Bradmoor Farm but we recommend that this landscaping/open space should be increased in this area to provide greater protection to the significance of the heritage asset.

We note that the framework masterplan includes some open space/landscaping along the southern boundary of the site. P54 references the adjacent historic battlefield site. We welcome some open space in this area.

We have previously requested further research into the battlefield, including exploring if the location of the battlefield can be determined. Has this research been completed and if so, what were the key findings?

8 Development Framework

P56

We welcome the references to the Design Guide as well as vernacular architecture.

P63 Sustainable Drainage Systems

Whilst Historic England broadly welcome Sustainable Drainage Systems, we recommend that the design of SuDS should take the presence of any buried archaeology into consideration. Direct impacts on buried archaeology should be avoided. Buried archaeological deposits can also be damaged by changes to the water management regime in an area such as a change in groundwater levels or soil moisture content.

Where proposals will impact on the significance of designated or non-designated heritage assets, appropriate mitigation should take place as part of the SuDS proposal. Developers should undertake early discussions with Historic England and North Norfolk Council. This requirement should be included in the Development Brief.

In particular, we note that some SUDs are proposed in the southern area of open space and landscaping which is intended to protect and enhance the Battlefield.





Careful consideration needs to be given as to whether SUDs would be appropriate in this location, given the heritage context.

P67 Public Realm and P68 Movement and Streets

We recommend including reference to our guidance, Streets for All – East of England <https://historicengland.org.uk/images-books/publications/streets-for-all-east-of-england/>. The manual offers guidance on the way our streets are managed. Specifically, it includes advice on traffic management, signage, lighting, ground surfaces and verges etc.

P82 Central Character Area

Again, we reiterate that more landscaping and open space is needed around Bradmoor Farmhouse and barns (grade II listed) to conserve and enhance the significance of these heritage assets and maintain a more rural setting.

P83 Character Area response

The current character area response makes no reference to the heritage assets. We would expect the development in the area around the listed buildings to respond to the historic context. This should be reflected in the Character Area response.

P90 Southern Character Area

Again, we reiterate that more landscaping and open space is needed along the southern edge of the site and could include some heritage interpretation reflecting the proximity to the battlefield site. We recommend enlarging this zone.

We caution the use of SuDs in this area, although further discussion with Norfolk County Council Historic Environment Service and Historic England in relation to archaeology will be required.

P102 Policy Response Table

The table provides a helpful summary of policy requirements and responses.

In preparation of the Development Brief and masterplanning, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

We should like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise, where we consider that these would have an adverse effect upon the historic environment.





Historic England

If you have any questions with regards to the comments made then please do get back to me. In the meantime, we look forward to continuing to work with you and your colleagues.

Yours sincerely

Debbie Mack
Historic Environment Planning Adviser
Debbie.Mack@HistoricEngland.org.uk



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





BIDWELLS