

GNLP 2141: Land at Manor Road, Newton St Faith

Regulation 18 Stage B Consultation Response - December 2018

Background

This Representation has been prepared by Bidwells, on behalf of Mrs Rachel Foley, in response to the Greater Norwich Local Plan Focussed Sites Stage B (Regulation 18) consultation.

On behalf of our client, we strongly recommend that the site is allocated for residential development. As previously demonstrated (GNLP 2141), the site occupies a highly sustainable location, given the local services on offer in Newton St Faith and Horsham St Faith; local bus services; and proximity to Norwich City Centre. Development on the site would give rise to a variety of social, economic and environmental benefits; helping to achieve the three objectives of sustainable development.

The site has received a preliminary suitability assessment within the October 2018 Housing and Economic Land Availability Assessment (HELAA) Addendum, published as part of the current Regulation 18 consultation. This Representation endeavours to address the potential constraints identified in the HELAA assessment Site Proposals Addendum.

Comments on HELAA Addendum, October 2018

The site has been assessed within the HELAA, with most of criteria under the suitability assessment achieving green ratings. The following criteria all achieved a **green** rating:

- Accessibility to Services;
- Utilities Infrastructure;
- Contamination and Ground Stability;
- Flood Risk;
- Market Attractiveness;
- Significant Landscapes;
- Townscapes;
- Biodiversity and Geodiversity;
- Open Space and Green Infrastructure;
- Transport and Roads; and
- Compatibility with Neighbouring Uses.

The following criteria within the HELAA assessment received **amber** ratings. These ratings are explored in further detail below:

- **Access**

As previously detailed, Orari Ltd produced an Access Appraisal in support of the Representation, which details how sufficient vehicular access to the site could be achieved, via Manor Road. In particular, individual driveways from Manor Road could be provided for a linear style development, or a junction to facilitate the creation of a 'Mews Court' within the site curtilage. A pedestrian footpath could also be provided alongside the western side of Manor Road as part of development on the site.

Therefore, the Access Appraisal details that suitable access (vehicular and pedestrian) to the site can be achieved, and that there are no traffic generation or highway safety issues which would preclude development on the site.

On this basis, we concur with the rating of amber for access in accordance with the HELAA Methodology, as pedestrian and vehicular access to the site.

- **Utilities Capacity**

In accordance with the HELAA Methodology, an amber rating is given to utilities capacity where no available utilities are on the site, but potential exists for improvements to facilitate capacity. We concur with this rating, as no utilities are currently present on the site, but potential to facilitate capacity for development on the site exists. In addition, given the site's close relation to existing dwellings in Newton St Faith, it would be envisaged that utilities would be in place in close proximity to the site, to serve future development.

- **Historic Environment**

The HELAA Methodology details that Historic Environment is given an amber rating when development could have a detrimental impact on, or the setting of a designated or non-designated heritage asset; but the impact could be reasonably mitigated. No further explanatory text is provided within the site suitability conclusions in relation to the scoring of amber for Historic Environment.

There are no heritage assets on, or within close proximity to the site. The nearest heritage assets in relation to the site are:

- Middle Farm House & Granary 30 Yards East of Middle Farmhouse (both Grade II Listed). These heritage assets are approximately 575m to the east of the site, bisected by a range of existing dwellings, gardens, roads, fields and trees/hedgerows. Therefore, no views of the heritage assets are achievable from the site.
- Mill Farmhouse, Horsham St Faith (Grade II Listed). Approximately 900m from the site, bisected by roads, dwellings, gardens, fields, trees and hedgerows. Dense hedgerows on the southern boundary of the site shields all views of the site from the south.
- Horsford Castle (Scheduled Ancient Monument). Approximately 1.48km from the south-west of the site, bisected by an area of dense woodland (known as the Wilderness), fields, and the A140, all shield views of the site.
- In addition, there are a number of other heritage assets towards the centre of Horsham St Faith, including the St Faith Priory (Scheduled Ancient Monument), and the Horsham St Faith Conservation Area. However, the centre of Horsham St Faith is approximately 1.5km from the site, bisected by a range of existing dwellings, housing estates, the Newton St Faith Crematorium, St Faiths Centre, fields, areas of woodland, trees and hedgerows. Dense hedgerows on the southern boundary of the site shield all views of the site from the south.

On this basis, we disagree with the rating of Historic Environment as amber. There are no heritage assets on, or within close proximity to the site. The nearest heritage assets to the site are still some

distance from the site, and are bisected by a range of dwellings and landscape features. Thus, development on the site would not impact on the heritage assets, or their settings. Therefore, in accordance with the HELAA Methodology, Historic Environment should be awarded a green rating, as development would not have a detrimental impact on any designated or non-designated heritage assets.

Comments on Site Proposals Addendum, October 2018

The Site Proposals Addendum outlines that constraints of the site relate to 'landscaping, design layout, and noise attenuation, due to its elongated form and location next to the A140'.

We disagree with the assertion that the form of the site would result in constraints related to design and layout. Given the shape and scale of the site, it is recognised that there would be sufficient opportunity to design either an estate around an internal estate road, or the ability to provide frontage development along Manor Road. Accordingly, neither layout or design is considered a constraint of the site.

It is recognised that the site does fall next to the A140, a major road link between North Norfolk and Norwich. However, with appropriate noise mitigation and landscaping, it is deemed that these constraints can be overcome. There are numerous examples where development has taken place adjacent to transport routes and where noise constraints have been suitably overcome.

Conclusion

The site is suitable, available, achievable and viable, and is deliverable within the first five years of the Greater Norwich Local Plan period. There are no constraints that would prevent the site from coming forward for residential development.

On this basis, the site should be taken forward as an allocation for residential development of 20 – 40 dwellings in the emerging Local Plan. Development on the site would meet all three objectives of sustainable development, and would help to distribute housing allocations and delivery across the district.