Introduction

1. The Local Plan settlement description of Honingham states that:

'Honingham is a small village immediately south of the A47 Southern Bypass in the Broadland district. The River Tud flows through the Village and consequently some areas are at fluvial and surface water flood risk. The majority of Honingham parish is rural, but the designation of a Food Enterprise Zone (FEZ) for businesses focused upon food processing and production should be noted. Currently 19 hectares of the FEZ, with a net developable area of approximately 16.5 hectares, benefits from Local Development Order (LDO) status promoting commercial development land on this site in units of varying scale.

There is one carried forward allocation at Easton totalling 1,044 homes. In addition, there is one site identified as a preferred option in Honingham providing for 12 new homes and one additional dwelling with planning permission. This gives a total deliverable housing commitment for Easton and Honingham together of 1,057 homes between 2018 – 2038.

Proposed site GNLP2176

- 2. The current consultation on the allocation of sites identifies site GNLP2176 as being a suitable location for future residential development in Honingham.
- 3. The supporting text to that proposed allocation states:

POLICY GNLP2176

Land North of Dereham Road, Honingham (approx. 0.76 ha) is allocated for residential development. This will accommodate at least 12 homes, 33% of which will be affordable.

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

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

- Vehicular access onto Dereham Road, with a suitable visibility splay, and a frontage design layout that reinforces the existing 30 MPH speed limit.
- Provision of 2.0m wide footways and carriageway widening to 5.5m for the full extent of the frontage.
- The site is within Source Protection Zone 3 and this should be taken into consideration when developing a drainage strategy.

 A design and layout that minimises adverse impact on the nearby heritage assets, notably the listed cottages and war memorial along the Street.

Suitability of Honingham for further residential development

4. The adopted Joint Core Strategy for Broadland, Norwich and South Norfolk (adopted March 2011 with amendments adopted January 2014) contains the following spatial objective in respect of the location of new housing:

4.4 SPATIAL PLANNING OBJECTIVES

Objective 2 To allocate enough land for housing, and affordable housing, in the most sustainable settlements

...

Most new homes will be built in the Norwich Policy Area (around 33,000 out of 36,820 between 2008 and 2026). Smaller sustainable settlements will accommodate smaller scale growth. People will have alternatives to using cars and new housing, employment and services will be planned so they are grouped together wherever possible. The settlement hierarchy defines the towns and villages with a good range of jobs, services and facilities.

...

- 5. The settlement hierarchy mentioned above classifies settlements as either:
 - 1. Norwich urban area
 - 2. Main Towns
 - 3. Key Service Centres
 - 4. Service Villages
 - 5. Other Villages
 - 6. Smaller rural communities and the countryside
- 6. Honingham is not included in the policies relating to categories 1 4 given above. However, it is mentioned in the 'Other Villages' category.
- 7. The 'Other villages' definition and the associated policy is as follows:

POLICY 16: OTHER VILLAGES

The Other Villages identified below will have defined development boundaries to accommodate infill or small groups of dwellings and smallscale business or services, subject to form and character considerations.

Aldeby, Bawburgh*, Bressingham, Brockdish, Burgh St Peter (including part within Wheatacre parish and the adjacent developed area in Aldeby parish), Burston, Caistor St Edmund*, Cantley, Claxton, Colton*, Denton, Flordon*, Forncett St Peter, Forncett St Mary, Frettenham, Great Melton*, Haddiscoe, Hainford, Hardwick, Hedenham, Hevingham, Keswick*, Ketteringham*, Langley Street, Marlingford*, Marsham, Morley, Needham, Shelfanger, Shotesham, Starston, Strumpshaw, Swainsthorpe*, Tibenham, Tivetshall St Margaret, Tivetshall St Mary, Toft Monks, Topcroft Street, Winfarthing

A limited number of existing settlement limits shown on the adopted proposals maps for Broadland and South Norfolk will be deleted.

This applies to Felthorpe, Honingham, Upton, Ranworth, Wacton, Weston Longville and Woodbastwick. The policy change making this necessary will take effect on adoption of the Joint Core Strategy.

- 8. It is clear from the above that Honingham is not included in the 'Other Villages' list and its former settlement limit (which defined suitability for further residential infill under the former Local Plan) is removed.
- 9. Honingham therefore falls within the residual category:

POLICY 17: SMALLER RURAL COMMUNITIES AND THE COUNTRYSIDE

In the countryside (including villages not identified in one of the above categories), affordable housing for which a specific local need can be shown will be permitted in locations adjacent to villages as an exception to general policy. Farm diversification, home working, small-scale and medium-scale commercial enterprises where a rural location can be justified, including limited

10. It is clear from the above that Honingham is identified in the adopted Core Strategy as being only suitable for 'affordable housing for which a specific local need can be shown'. It is also clear that the Core Strategy expressly identified the village as being unsuitable for any further (general) residential infill.

Access to services

11. A primary reason for categorising Honingham as a 'Smaller rural village' is that it has very limited services or facilities within the village. Whilst it has some

- community facilities (such as a village hall and public house/restaurant) the village contains none of the other basic services needed by residents.
- 12. The nearest place that a very limited range of those services can be obtained is in Mattishall. However, children living at the proposed GNLP2176 residential development would have to travel either to the primary school at Easton (just over 4km) or to the secondary school in Norwich (just over 8km).
- 13. Mattishall is almost 6 kilometres away from the proposed GNLP2176 residential development. There are no continuous footways between these two points and the roads concerned are either very narrow (closer to the proposed development) or currently accommodate a considerable volume of fast-moving traffic (Mattishall/Norwich Road). Consequently, there is no safe way for pedestrians (or cyclists) to travel between GNLP2176 and Mattishall to access services. The policy requirement 'Provision of 2.0m wide footways and carriageway widening to 5.5m for the full extent of the frontage' will do nothing to address this significant safety failing. Consequently, there is no way that the proposed housing can be occupied without being reliant on motorised transport.
- 14. There are no public transport services which serve Honingham village. The nearest bus service runs along Mattishall/Norwich Road with the nearest bus stop being located at the junction of Colton Road with Mattishall Road. This is an open bus stop (with no shelter or even hedge). This bus stop has an extremely small surfaced standing area (so small that a parent with a child in a pushchair would have to stand in the road or on the grass verge) and which is curbed so that a person in a wheelchair would be unable to get off the road onto it. There is only one bus service which currently only runs every hour Monday to Friday and every two hours at the weekend.
- 15. GNLP2176 is 800m from this bus stop and whilst there are (unlit) footways through the village, these end at the edge of the settlement. The final 450m along Colton Road is along a unlit narrow country road which (at points) is in a cutting, making it extremely difficult to get off the metalled surface safely:



Colton Road

- 16. It is clear from the above that, for the occupants of the proposed housing on GNLP2176:
 - access to even the most basic of services and facilities will (almost without exception) require them to leave the village
 - the nearest place that even a limited range of service is available is over
 6km and there is no safe way to walk or cycle there
 - they would have to walk significant distances to access what limited public transport exists, and that there is no way to safely make that journey to the nearest bus stop on foot.
- 17. Accordingly, any residential development in Honingham would be solely carbased. However, the highways network in the immediate area is extremely limited in its capacity.

Highways

- 18. The immediate highways network around Honingham is of a type typically found in rural Norfolk.
- 19. These are narrow (either single track or only nominally two lanes) with extremely limited (by hedge and tight bends) visibility (both for other road users on the road and those entering and leaving it). They are unlit and with no continuous footway provision. Consequently, drivers and pedestrians frequently encounter each other with very limited warning.
- 20. There is a main arterial road (A47) to the north. This is single carriageway at that point (despite being dualled to the east and west) and therefore suffers significant capacity issues at peak times.
- 21. There is a significant road (Mattishall/Norwich Road) to the south. By virtue of its linking of the southern half of Dereham (together with Yaxham, Mattishall, and East Tuddenham) to Norwich (via the A47 near Easton and avoiding congestion at the A47 Dereham access) in a relatively straight road, this carries more traffic and at a greater speed than would normally be expected.
- 22. As explained above, occupants of the proposed housing on GNLP2176 would be forced to use cars. Those cars would significantly increase the traffic on the already sub-standard highways network immediately around the site. Those cars would then be forced to join either the A47 or the Mattishall/Norwich road, increasing congestion at the junction points as they try to join fast-moving and high volumes of traffic.
- 23. It is clear from the above that residential development on GNLP2176 would be significantly detrimental to the safety and convenience of existing and new highways users.
- 24. Reducing highways safety and convenience would also negatively impact existing local businesses, including those at the Honingham Quarry Works Business Centre.

Neighbouring businesses

- 25. Immediately opposite to the proposed GNLP2176 allocation on Dereham Road is the Honingham Quarry Works Business Centre.
- 26. This provides industrial units, individual offices (Herbert Smith House) and a self-contained office suite (George Smith House).
- 27. There are currently 14 businesses based at the Quarry Works Business Centre and together, they are the most significant local employment cluster. The businesses at the Quarry Works Business Centre are also very important to the local economy, both directly and to tertiary services.
- 28. GNLP2176 will access onto Dereham Road on the inside of a severe convex bend. This means that (bearing in mind the narrowness of the road) vehicles leaving the proposed allocation will be unable to see traffic approaching from either the east or west. Visibility to the east is further restricted by a sharp bend in the village centre.
- 29. Several businesses at the Quarry Works Business Centre receive clients onsite on a daily or hourly basis. Together with the other existing businesses onsite, significant volumes of traffic are generated, particularly at peak times. These businesses also rely upon the current ease of access to enable them to operate efficiently. Introducing the traffic generated by 'at least' 12 houses onto the existing narrow access roads will inevitably lead to conflict between highways users. This will be exacerbated because the new residents will be forced to use cars and many of them will be leaving for work or school at peak times.



Dereham Road showing the Quarry Works Business Centre on the left and the frontage to GNLP2176 on the right

30. Placing a residential allocation on Dereham Road opposite the Quarry Works Business Centre will lead to traffic conflict and delay, and jeopardise the success of both the Business Centre and the existing businesses located there. Any detriment to these will, in turn, affect local employment and the local economy.

Flooding

- 31. The field that contains GNLP2176 has a significant fall of approximately 8m from the north-north-west (A47 boundary) to the south-south-east and the frontage onto Dereham Road.
- 32. Development of GNLP2176 will therefore require the increased surface water run-off of residential buildings and associated impermeable surfacing to be attenuated onsite to maintain greenfield run-off rates.
- 33. Any attenuation basin will need to be located on the lower section close to the frontage (to avoid an unadoptable pumped solution). This will inevitably lead

to increased flood risk for the existing housing and the Quarry Works Business Centre on the south side of Dereham Road.

- 34. The frontage of GNLP2176 terminates onto Dereham Road via a pronounced bank. Any residential development on GNLP2176 will therefore require considerable works to cut back this bank to create an access and provide visibility. As well as completely changing the character of this area, those works are likely to change the existing surface water flows on Dereham Road and, again, lead to increased flood risk for the existing housing and the Quarry Works Business Centre on the south side of Dereham Road.
- 35. Any development on GNLP2176 will therefore lead to an inevitable increase in the flood risk to both existing housing and existing businesses.

Conclusion

- 36. The allocation of residential development on GNLP2176 is contrary to both Objectives and Policies of the adopted Joint Core Strategy.
- 37. 'Objective 6: To make sure people have ready access to services' of the adopted Joint Core Strategy seeks to ensure:

. . .

Wherever new homes or jobs are to be developed, existing supporting services must either already be adequate or will be provided at the right stage of a new development. This will ensure existing and future residents and workers will have access to the services they need.

. . .

38. *'Policy 6: Access and transportation'* of the adopted Joint Core Strategy seeks to ensure:

...

concentration of development close to essential services and facilities to encourage walking and cycling as the primary means of travel with public transport for wider access

. . .

39. 'Objective 10: To be a place where people feel safe in their communities' of the adopted Joint Core Strategy seeks to ensure:

. . .

better road safety and design of new developments will help to reduce crime.

40. 'Policy 2: Promoting good design' of the adopted Joint Core Strategy seeks to ensure:

. . .

- the need to ensure cycling and walking friendly neighbourhoods by applying highway design principles that do not prioritise the movement function of streets at the expense of quality of place
- the need to increase the use of public transport, including through 'public transport oriented design' for larger development

. . .

- 41. As explained above, the proposed GNLP2176 site is remote from essential services and facilities, with no opportunities for safe or realistic access by walking or cycling or by public transport. There is no reasonable prospect that this situation will change in the foreseeable future.
- 42. Residential development at this location will create significant traffic conflict, with consequent detrimental effects on highways safety and movement. It will adversely affect an important local employment centre and threaten local businesses and the wider local economy. It will also lead to increased flood risk to existing houses and businesses.
- 43. For these reasons, the Greater Norwich Development Partnership is requested to remove the allocation GNLP2176 on the grounds that it does not meet the requirements of adopted policy.