

GNLP – REGULATION 18(C) CONSULTATION RESPONSE

GNLP0422 – LODGE FARM, HORSFORD

On behalf of Mrs Rachel Foley, we strongly propose the allocation of GNLP0422, Lodge Farm, Horsford, for residential development. The site is entirely deliverable, and capable of making a valuable contribution towards satisfying the Councils' housing needs during the period to 2038.

GNLP0422 has been assessed as being an unreasonable residential site in the draft GNLP, on the basis of 40 dwellings, due to having convoluted access, being unclear how the site would be accessed from the highway, and the site being unable to accommodate the scale of development proposed.

The following Representation outlines the suitability of the site for residential development, recommending that the site is re-considered and allocated for residential development. In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the proposed allocation represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable. This is considered in further detail below.

Assessment of Delivery

Suitable

Horsford, Felthorpe and Haveringland are jointly designated as a village cluster in the draft GNLP, based around the catchment of Horsford Primary School. Horsford benefits from a Post Office, bakery, primary school (split between two sites: one on Holt Road, the other on Mill Lane), village hall, pharmacy, Co-op, butchers, multiple takeaways (Fish and Chips, Hong Kong Chinese Takeaway, Spice of India), a pub, and a children's soft play centre.

Given the suitability of the village cluster, it is surprising that only one site for 30-40 dwellings has been identified, despite the commentary confirming that approximately 20-50 new homes are appropriate for the cluster. Therefore, allocating GNLP0422 will help achieve the GNLP's target of 9% of total housing growth being within village clusters (480 dwellings in Broadland).

The following commentary demonstrates the suitability of the site having regard to technical matters, whilst responding to the points raised in the justification for assessment of the site as an unreasonable alternative in the draft GNLP.

Amendments to Red Line Boundary and Quantum of Development

The site has been previously promoted through the Regulation 18 (b) consultation for approximately 40 dwellings, based on a site area of 2.35 ha.

However, through this Representation, it is sought to amend the red line boundary, alongside reducing the site area and quantum of development proposed on the site. More specifically, the village cluster assessment booklet confirms that only one preferred allocation has been identified in the village for 30 - 40 dwellings, despite development of 20 - 50 dwellings being appropriate for the cluster. Accordingly, this leaves a surplus of between 10 – 20 dwellings capacity for allocation in the village cluster.

On this basis, it is sought to reduce the quantum of development proposed on the site to 10 – 20 dwellings, in order to accommodate this surplus. In reducing the quantum of development proposed to 10 – 20 dwellings, it is sought to both amend the red line boundary and reduce the site area to 0.86 ha.

One of the reasons for the site being identified as being unreasonable was due to the convoluted access route into the site. As a result, the red line of the site has been amended, to include land to the north and west of the access route. In parallel, this helps to create a logical extension to Horsford whilst addressing concerns over convoluted access route. A copy of the revised red line boundary plan is available in **Appendix 1**.

Access

The site was also considered to be unreasonable for allocation due to it not being clear how the site would be accessed from the highway, alongside convoluted access arrangements.

An Indicative Access Road General Arrangement Plan has been prepared by Orari Ltd, which demonstrates how a suitable access can be achieved from Holt Road, based on a Type 3 access road. The access junction achieves visibility splays of 2.4 m x 59 m, in accordance with Manual for Streets ‘Sight Stopping Distances’ for Holt Road vehicle speeds of 37 mph.

The access junction is based on a 5 m road, including 1.8 m footpaths. Due to an existing barn part way down the internal access road, a priority junction is proposed.

Accordingly, the access plan confirms that suitable access can be achieved, overcoming the reasons for the site being determined to be unreasonable.

Deliverability and Proposed Housing Trajectory

The following Housing Trajectory has been based on robust local evidence, including the completion of a range of similar scale developments across the District.

Based on the submission of a planning application in 2022, to tie in with submission of the Local Plan, 6-9 months have been allowed for the determination of the planning application, alongside a further 6 months to commence construction on the site.

Assuming construction commences on site in 2024, it is assumed that the development would be complete in 2024; well within the first five years of the Local Plan period. The Housing Trajectory has been based on the site accommodating 20 dwellings.

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038
Units	0	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cumulative Total	0	0	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20

Available

The site, in its entirety, is owned and occupied by Mrs Rachel Foley. The site is available and developable immediately.

Achievable

Based on the suitability assessment above, there are no site-specific constraints which could threaten the delivery of residential development on the site. Therefore, residential development on the site is deemed to be entirely achievable.

Viable

Mrs Rachel Foley is confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site. This statement is, however, made in the context of the questions that have been raised in relation to Greater Norwich Local Plan Interim Viability Study (2019) (Question 48). Further discussions are required with the GNLP Team on these matters in order to confirm that the various policy objectives, such as affordable housing and community infrastructure,

can be delivered on site without prejudicing the viability of the site. Mrs Rachel Foley is keen to continue discussions with the GNLP Team on this matter asap.

Summary

The cluster of Horsford, Felthorpe and Haveringland is a sustainable location for growth, benefitting from a Post Office, bakery, primary school (split between two sites: one on Holt Road, the other on Mill Lane), village hall, pharmacy, Co-op, and a pub.

As has been demonstrated, the site is suitable, available, achievable and viable, and is deliverable within the first five years of the plan period. As previously recognised, there are no constraints which would affect the suitability of the site for residential development. In addition, this Representation has demonstrated the suitability of the site to accommodate 10-20 dwellings. Accordingly, the foregoing text demonstrates that this specific site is a suitable location for further development, and GNLP0422 should be identified as a preferred allocation for residential development.