



**Stage C Regulation 18 Draft Strategy and Site Allocations Consultation
(29th Jan- 16th March 2020)**

**Proposed Residential Site at
Holt Road Horsford Ref GNLP0283**

**On behalf of
Carl Palmer & Wellington**

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Proposed Residential Site at Holt Road Horsford Ref GNL0283

1.0 Stage C Regulations 18 Draft Strategy and Site Allocations Consultation

- 1.1 These representations are made in support of an allocation for the residential development of site Ref: **GNLP 0283** land at Holt Road, Horsford. Site Area 3.43 Hectares – 105 Dwellings (“the site”).
- 1.2 The Housing and Economic Land Availability Assessment (HELAA) which has been completed for each site greater than 0.5ha considered as part of the GNL0283 consultations so far provides a “red”, “amber” or “green” indicator against each criterion.
- 1.3 The GNL0283 Dec 2017 HELAA concluded that the site would be “Suitable” for the Land Availability Assessment despite it being assessed as “amber” for Access, Utilities Capacity, Townscapes, Historic Environment & Transport & Roads. All other criterion were given a “green” indicator.
- 1.4 The HELAA comparison Table in the latest Horsford Assessment Booklet still retains these five “amber” indicators, with all remaining indicators being “green”.
- 1.5 The latest Horsford Assessment Booklet sets out that the following general comments have been made in response to previous consultation on the site:

“The site would prejudice a “no development” policy near the NDR of which the aim was to free traffic on the radial roads, also ribbon development”.

“Comments submitted in support of site. The site is considered suitable for development as investigation, surveys and reporting has been undertaken in relation to the site to justify its suitability”.

- 1.6 At Stage 4 of the Horsford Assessment Booklet, sites are assessed in order to establish whether they are suitable for allocation. This states that a range of factors have been taken into account to establish whether a site should, or should not, be considered suitable for allocation. These factors include: impact on heritage and landscape; impact on the form and character of the settlement; relationship to services and facilities; environmental concerns, including flood risk; and, in particular, a safe walking route to a primary school. This section of the Horsford Assessment Booklet states that the sites which do not have safe walking route to school, or where a safe walking route cannot be created will not be considered suitable for allocation. Stage 4 of the Horsford Assessment Booklet also states that conclusions in regard to a site’s performance against the relevant factors have been informed by the outcomes of the HELAA, previous consultation responses received and “other relevant evidence”.
- 1.7 Stage 4 of the Horsford Assessment Booklet sets out that the site is a “less preferred site” along with eight other sites for the reason that these sites are:

“not considered to be reasonable alternatives for a combination of reasons. These reasons are: the land is not accessible walking distance to facilities; the site is separated from the existing built edge of the village, and the size of the sites far exceeds the strategic requirement for housing...”

1.8 Stage 7 of the Horsford Assessment Booklet provides appraisal of sites. This sets out that the site is considered to be “unreasonable” for allocation for the following reasons:

“This site is not considered to reasonable for allocations as it is separate from the built edge of the village development here would be quite remote from the services in the main part of the village. There is no safe walking route to Horsford Primary School”

1.9 For the reasons set out in this consultation response and demonstrated through the planning application that has been submitted, these reasons for considering the site to be unreasonable are not justified and do not provide a sound basis for rejecting the site for allocation.

1.10 Only one site has been identified as a preferred site in Horsford GNLP 0264 Dog Lane for 30 – 40 Dwellings (1.76 hectares).

1.11 We are aware of the January 2020 Regulation 18 (C) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan. This document does not assess the Site as an alternative site in addition to those preferred and reasonable alternative sites set out in the Horsford Assessment Booklet. For the reasons set out in this consultation response we submit that this is a flawed approach. The site is sustainable and deliverable as demonstrated through consultation on the planning application that has been submitted for residential development (see below) and as otherwise set out in this consultation response. In order for the plan to be sound we consider that the Site should be considered again as a suitable site for residential allocation.

2.0 Background

2.1 This site is presently being considered by Broadland DC through an outline planning application (ref: 20181408) submitted on 23rd Aug 2018, initially involving 65 dwellings but, subsequently, has been subject to extensive consultation and negotiation leading to a reduction in the number of dwellings to 47. At the time of making these submissions this planning application remains undetermined.

2.2 In addition, the site was submitted on 22nd June 2016 as part of the initial “*Call for Sites*” process and at that time the document referred to 105 dwellings on an overall site of approximately 3.5 hectares. This was based on a simple calculation of an average density of 30 per hectare.

2.3 Taking into account several unique site characteristics, the aforementioned negotiations have resulted in the planning application scheme being reduced to **47 Dwellings** including **17 affordable homes** (36% of the total number of homes) and a substantial amount of public open space with established tree cover, in excess of 12800 sq. m. plus an area identified as a Surface Water Lagoon of 2025 sq. m.

2.4 Through a great deal of work during the planning application process, it is understood that there are currently no outstanding statutory consultee objections to the application. At **Appendix 1** we annex the latest masterplan for the planning application.

2.5 At **Appendix 2**, we also attach a letter from the planning officer for the planning application dated 6 February 2020 which sets out that the principal objection to the current planning application is that it is outside of current development plan policy boundaries and is not

otherwise allocated for development. The planning officer makes clear that if the site were allocated for development, or located within defined settlement limits, the details submitted in support of the outline planning application do demonstrate that the proposal would be policy compliant in all other respects. It is on this basis it is understood that there are no objections from any statutory consultees. These conclusions are at odds with the conclusions we have summarised above in the Horsford Assessment Booklet.

- 2.6 As part of this consultation response Canham Consulting Ltd have been commissioned to produce a Connectivity Assessment which is attached at **Appendix 3** to also demonstrate why it is compliant with GNLP requirements.

3.0 National Planning Policy Framework (“NPPF”)

- 3.1 Section 3 of the NPPF sets out the Government’s framework for plan-making.
- 3.2 Paragraph 35 of the NPPF sets out that a plan is sound if it is positively prepared, justified, effective and consistent with national policy.
- 3.3 In order to be justified, a local plan must take into account reasonable alternatives. In this case, we consider that the site should be re-considered as a suitable site for residential allocation for the reasons set out in this consultation response.
- 3.4 In addition, for a plan to be effective it must be deliverable over the plan period. As a demonstrably deliverable site, the inclusion of the site as a residential allocation would help the new GNLP to be effective.

4.0 GNLP Strategy

4.1 Section 2 Spatial Profiles

The Latest version of the draft plan estimates that the total population of Broadland, Norwich and South Norfolk in 2018 was 406,000. Population projections indicate that this will rise to around 452,000 by 2038.

Horsford is recognised as having the 9th largest population in this area. This supports the view that greater numbers of housing should be allocated at Horsford than currently proposed.

4.2 Section 4 Delivering Growth and addressing Climate Change

The GNLP’s delivery statement indicates that it will only allocate housing sites where “a reasonable prospect of delivery” can be evidenced

In this case, it is clear that the site is deliverable and the landowner has already proactively submitted a planning application for determination which has no outstanding objections from statutory consultees. This clearly demonstrates that there are no technical difficulties to deliver the site and, furthermore, it would be deliverable within the first five years of the GNLP plan period.

The GNLP's delivery statement is also clear that additional opportunities will also be provided through small scale growth at villages and on small brownfield sites across Greater Norwich. The site should be considered as offering an opportunity for such growth.

5.0 Section 5

5.1 Policy 1 Sustainable growth strategy – housing growth needs

The Council's local housing need figure based on the Government's standard methodology is given in the latest version of the draft plan as 40,541 with 7,840 of these due to be met through allocations in the new GNLP and the South Norfolk Village Clusters document. Whilst the South Norfolk Village Clusters will be a separate document, development in Broadland needs to be allocated in the GNLP itself.

Table 6 in the Council's draft plan sets out that the publication version of the new GNLP will aim to provide a minimum 10% buffer (a minimum of a further 250 homes) in the plan area which is likely to be provided through a combination of additional sites proposed and contingency sites. For the reasons set out in this consultation, it is submitted that Horsford is a suitable area for greater housing allocations and that in this context the site (GNLP 0283) should be allocated for development in the next version of the Council's adopted local plan.

A) Settlement Hierarchy

Horsford is not identified as a Key Service Centre (KSC) in the draft plan. This is despite having a greater population than all of the other KSC's save for Hethersett and Poringland/Framlingham Earl.

Instead, Horsford is envisaged as a village cluster combined with Felthorpe and Haveringland.

We question why Horsford is not recognised as a Key Service Centre when the GNLP's own Horsford Assessment Booklet recognises that Horsford has a range of services and facilities including two primary schools, a shop, medical centre, post office, village hall, pharmacy, public house, industrial area, recreation ground, place of worship (including a nursery), convenient bus stop and direct access to Norwich Broadway ; and given that Horsford is the 9th largest settlement in the overall area.

Firstly, with regard to the identified KSC's, whilst leaving aside Hethersett and Poringland/Framlingham Earl, which are the only two identified KSC's with bigger populations than Horsford, it is the case that Horsford is comparable to the other identified KSC's.

Reviewing the Assessment Booklets for relevant KSC & VC sites, it would appear that the main distinction seems to be that Acle, Loddon, Reepham and Wroxham have high school or secondary school facilities and Brundall and Acle have rail connections, but otherwise the range of facilities are broadly the same as in Horsford. In addition, in the case of Hingham, also identified as a KSC, there do not appear to be any more facilities than those offered in Horsford.

Turning to the identified settlements under the Village Cluster (VC) category under Policy 7.4, only sites in the Broadland DC area could be assessed in comparison to Horsford. It would appear that:

- Cawston, Brandiston and Swannington
- Coltishall, Henstead and Stemminghall
- Foulsham and Themelthorpe
- Freethorpe, Halvergate and Wickhampton
- Alderford, Attelbridge, Little Witchingam and Morton on the Hill and
- Lingwood and Burlingham, Strumpshaw and Beighton

All have a similar range of services to those offered in Horsford but 11 further clusters have fewer facilities and therefore there is a clear distinction.

Failing to recognise Horsford as a Key Service Centre (or otherwise removing the “Service Village” category of settlement), and treating this as part of a VC, means the approach of the GNLP and its approach to sustainability appraisal and site selection is flawed. It does not appear to be the case from the information presented that Horsford is subject to any particular development constraints that cannot be overcome by well-prepared development schemes (such as that currently proposed for the Site (**See APPs 1 & 3**)). However, by treating Horsford as part of a VC, the capacity of Horsford for Growth is artificially reduced by a policy construct.

The identification of Horsford as part of a VC restricts its capacity for new development in line with the proposed settlement hierarchy. In light of the above, we see no clear justification for this approach.

In the current development plan, Horsford is defined as a “Service Centre” and its reclassification appears to have arisen from the decision to remove that designation and instead introduce a concept of “*village clusters*” which was not even mentioned in the GNLP Growth Options paper in January 2018. The draft GNLP refers to this as “Grouping all smaller villages and the countryside in the village clusters” but it simply is not the case that Horsford is a “smaller” village.

Given the above, it is considered that Horsford should be identified as a KSC or at the very least a Service Centre, along with the villages referred to above as previously was the case. If it is identified as a Village or part of a cluster under the auspices of the proposed VC Policy (7.4) then it is contended that this would unfairly discriminate against its potential for growth and would hamper the overall strategic objective of delivery of housing.

5.0 Other Considerations

The Horsford Assessment Booklet suggests that the site is remote from services and there is no safe walking route to school. The accompanying Connectivity Assessment, prepared by Canham Consulting (**see App3**), clearly demonstrates that this is not the case.

6.0 Overall Summary

- 6.1 The promotion of this site through the application process is well documented and the outcome through negotiation has arrived at a scheme which in overall terms complies with all policy requirements. To reinforce this position the following reports (and through amendment & negotiation) as set out below have been endorsed by the LPA as evidenced in the letter attached at **APP2**:

Transport Statement

Ecology

Bats & Owls Survey

Contamination (& Mineral Extraction)

Flood Risk

Archaeology & Heritage

Arboriculture

- 6.2 The only outstanding issue is that of development outside of the SB, but as the Connectivity Assessment (see **APP3**) demonstrates the site is wholly sustainable and capable of being integrated into the development area.
- 6.3 Finally, as fully demonstrated above, Horsford should be identified as a KSC (or at the very least a Service Village as at present) to secure a sensible level of growth reflecting the realistic status of the village and therefore a contributor towards an effective local plan capable of delivering housing and achieving relevant strategic objectives.

Appendices

- APP 1** Revised Master Plan (Dwg. No.SK002 rev F dated 1st Feb 2019) for 47 dwellings inc. 17 AH.
- APP 2** Correspondence dated 6th Feb 2020 from the LPA (Case Officer J. Fox) -confirmation that the scheme would be Policy Compliant bar its location outside of the Settlement Boundary.
- App 3** Connectivity Assessment (Canham Consulting Ltd March 2020).