

Proposed Residential Development on land east of Old Norwich Road, Horsham St Faith

Submission of Representations relating to Regulation 18 Consultation (Stage C), Greater Norwich Local Plan

**on behalf of ESCO Developments Ltd, Lovell Partnerships Ltd and
JF Parker and PM Parker-Brown**

Ref: 027546

GNDP Site ref: GNLP0482

REPRESENTATIONS TO REGULATION 18 CONSULTATION ON THE GREATER NORWICH LOCAL PLAN MARCH 2020

Greater Norwich Local Plan: Land east of Old Norwich Road, Horsham St Faith (Ref: GNLP0482)

Introduction

1. The following comments are submitted in support of the suggested allocation on the land east of Old Norwich Road (ref: GNLP0482), on behalf of Lovell Partnership Ltd and ESCO Developments, in conjunction with the landowners.
2. Representations for this site were submitted to the previous Reg 18 Consultation for the Draft Local Plan in December 2018.
3. The following Representations both reiterate information already submitted in support of the site, as well as comments on the status of the site in light of the current consultation.

Comments on Draft Local Plan

5. The new Local Plan seeks to meet the growth needs of the Greater Norwich area for the period from 2018 to 2038. Under the proposed settlement hierarchy, most of this growth would be directed to the larger settlements, including Norwich, the main towns and key service centres. However, some 9% of housing growth (amounting to around 4,024 dwellings) would be provided in 'village clusters'.
6. In Broadland, the draft Local Plan allocates sites to meet the requirement for up to 480 more homes in village clusters, in addition to the 995 homes already committed. The village clusters are based around primary school catchments, informed by the school capacity or ability to grow, along with the availability of other accessible services, defined as the 'social capacity' of a cluster. The Plan confirms that the sites with the fewest constraints have helped to provide the indicative view on the potential amount of growth in specific clusters.
7. Horsham and Newton St Faith are identified as forming part of a village cluster. The Draft Plan suggests Horsham & Newton St Faith as being capable of accommodating 20-30 units. However, with its close proximity to the fringes of Norwich, Norwich International Airport and the A1270 Broadland Northway (NDR), it is suggested that a higher allocation (60 units) to deal with the housing pressures of the Greater Norwich Urban Area would be appropriate.
8. The current Reg 18 consultation identifies the site as 'unreasonable' in the Draft Local Plan. It states that *'this is a sizeable site which if developed in its entirety would be too large for the identified capacity of the cluster. The site is considered to be unreasonable for allocation as development in this location would be particularly prominent in the landscape'*. It is noted that the site area assessed was much larger than that proposed in the December 2018 representations and extended beyond the existing built-up area. This makes that assessment invalid and contradicts the 2017 and 2018 HELAAs which assessed a much larger site submission as acceptable in the landscape.
9. Notwithstanding the initial HELAA assessment, it is considered that the proposed site would not be unduly prominent, being sheltered by a green edge which surrounds the housing alongside open space provision on its northern side. Secondly, the contention in the general comments of the Horsham St Faith Assessment Booklet that *'prime agricultural land would be sacrificed'* is incorrect

as the latest Agricultural Land Classification map of Eastern England places this site within Grade 3- Good to Moderate agricultural land.

10. Whilst the overall strategy for village clusters contained in Policy 7.4 is supported, we do not agree that the site at Old Norwich Road should be considered unreasonable. The site offers a good opportunity with minimal constraints/impact on the character of the village. Furthermore, the site is not within a sensitive area, being within a relatively dense residential area and ‘reads’ as part of the residential area for this part of the village. This is also confirmed by the earlier HELAA assessments in their ‘Green’ classification for landscape for the site, which was based on a larger site area than that currently proposed.

Current Proposals

Layout

11. The layout submitted shows a scheme of approximately 60 units, which represents a reduction in the number of units originally submitted during the last consultation, following more detailed design and layout discussions. The scheme provides a mix of 2, 3 and 4 bed houses and bungalows with provision of vehicular and pedestrian access, and garages or off-road parking.

12. Generous areas of public open space have been provided to the north and south-west areas of the site which both act as buffers between the proposal scheme and those properties to the west that back onto the site. An open village green will be created at the junction of Old Norwich Road and Spixworth Road.



Figure 1- Indicative site layout

Highways and Access

13. It is proposed that the primary access to the development will be provided via Spixworth Road, which adjoins the northern boundary of the site. Bullock Hill is to be closed to motorised traffic between Calf Lane and Spixworth Road to create a footway/cycleway. The scheme does not propose access off Old Norwich Road. The site adjacent to Old Norwich Road provides a direct link

to the village centre and is constructed to a good standard, facilitating two -way traffic and benefitting from street lighting. The road is subject to a 30mph speed limit.

Benefits/Impact

Access to Services

14. Horsham and Newton St Faith are identified in the current Draft Local Plan as a Village Cluster. Horsham St Faith has a range of facilities including a Post Office and Stores (Back Lane), Drayton Medical Practice, and St Faiths Centre (Manor Road) & Saint Faiths' Church of England Primary School. The site is within 0.2km of the Post Office and Stores.

15. The village is located within approximately 2.4km of the village of Horsford, which contains additional facilities, including an East of England Co-op food store, restaurants, public houses, a village hall, nursery and primary schools, doctors and further employment opportunities.

16. A number of bus services operate on weekdays and Saturdays through the village, providing links to Norwich, Reepham and Sheringham. There are bus services running from Norwich Road, service 43 to Reepham (operated by Sanders Coaches), and 44A to Sheringham (also operated by Sanders Coaches). The nearest bus stops are located approximately 160m on Church Street, opposite the Church of Saint Mary and Saint Andrew and 160m on Norwich Road. The site is in close proximity to the NDR.

17. Furthermore, it is considered that the proposed development would benefit from good access to local services, and would accord with local and national planning policies which indicate that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

18. It is acknowledged that due to the site's rural location, residents of the proposed development would be reliant to a degree on car travel for their main shopping and leisure trips. However, a number of sustainable transport options would nonetheless be available to access local services, including walking, cycling and public transport.



Figure 2- Access to services for Horsham St Faith residents (Source: Google Maps)

Landscape/Local Character

19. The Draft Local Plan discounts the site on the grounds of landscape impact. As previously discussed, the HELAAs categorised landscape as green for this site, thereby establishing from the outset, even on a larger site that there were no sensitive landscape designations. In response to this, we have commissioned a landscape assessment prepared by Greenlight Environmental Consultancy.

20. The assessment confirms that the area is judged to be able to accommodate the proposed change. The report also confirms that there would be a low level of change to the receiving landscape character beyond the site boundaries and that the greatest effect on visual amenity is likely to be experienced immediately adjacent to the site only. Any more distant views of the proposed development beyond this are limited and, if experienced, will be in the context of the existing settlement edge. The report concludes that, due to the low density of the proposals to be accommodated and the existing, enclosed settlement edge, the landscape and visual effects of the proposal are considered to be acceptable

21. As such, whilst the proposal would inevitably result in a loss of openness, its impact on the landscape setting of the village and the character of the area would be limited.

22. The established pattern of development in the vicinity is mixed but is made up predominantly of detached and semi-detached houses and bungalows set in good-sized plots. The village has a predominantly nucleated settlement pattern.

Utilities Infrastructure

23. It is not considered that there is any fundamental impediments to the delivery of the site through any constraints relating to utilities infrastructure. The attached report prepared by Royal Haskoning confirms the existing utilities capacity and potential for improvements in the locality.

Flooding

24. The site falls within Flood Risk Zone 1 (low risk) with small pockets of minor surface water flooding possible on Bullock Hill. Further technical work, including a site-specific flood risk assessment, would be commissioned as part of any future planning application, to demonstrate that the proposed development would not be a risk of flooding or be likely to result in an increased flood risk elsewhere in the locality.

Heritage

25. There are a number of grade II listed buildings in the vicinity of the site. The most relevant, The White House, is located opposite the site off Old Norwich Road. Given its separation from the site and the screening effects of the development's green edge, it is considered that the proposed development would not have a material impact on the setting of The White House or any nearby listed buildings. The site is not located within the Horsham St Faith Conservation Area, which is located to the north and east of the site boundary.

Delivery of Development

26. No significant infrastructure constraints have been identified to date which would be likely to delay or impede the development of the site for housing. The site is in a single ownership and no further land is needed to enable the land to be brought forward for development. The land is currently available for development. Subject to approval, this site could deliver housing in the short term.

27. The site is being promoted by Lovell Partnerships Limited and ESCO Developments in conjunction with the landowners, with Brown and Co as Planning Consultants.

28. The proposed development would make a positive contribution to the supply of market and affordable housing in the area. The proposal would also add to the range of housing sites available in the locality, providing flexibility and a wider choice of development opportunities to the market, and thus strengthening the local supply of housing land. New residents would add to the vitality of the local community. Given their accessibility, existing local businesses and services would be likely to derive support from the development due to the addition to the local economy of the spending power of new residents. The construction of the development would also provide some economic benefits, albeit temporary.

29. Furthermore, it is considered that Horsham St Faith would represent a sustainable location for development of the scale envisaged, given its close proximity to Norwich and its wide array of services. By providing sufficient land of the right type in the right place to support growth the development would address the social, economic and environmental dimensions of sustainable development, as defined in the NPPF.