

From: Charles Judson
Sent: 24 May 2019 09:41
To: Iain Hill
Subject: Land at Fir Covet Road, Taverham

Dear Iain

Thank you for the opportunity to provide comments on the above proposal following the submission of the Pre-Application document in December 2018 and our subsequent meetings on 23 January 2019 and on 12 March 2019.

Based on the information provided I understand that it is proposed to submit an application for 200 dwellings, a 5 acre sports pitch extension to Hinks Meadow and associated highways, drainage and landscaping works. The site is 14.9 hectares and access would be provided via a new 4 arm roundabout onto Fir Covert Road, with potential for emergency access onto the Broadland Northway roundabout to the north-west

Principle of Development and Housing Supply

The site is located outside of a settlement limit as defined on the policies maps which accompany the development plan. Policy GC2 of the Development Management DPD (2015) states that outside of these settlement limits development which does not result in any significant adverse impact will be permitted where it accords with a specific allocation and/or policy of the development plan. You will be aware that the site is not allocated and the development would not comply with a specific policy of the development plan. As a consequence the proposals would not comply with the development plan. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The NPPF is a material consideration and it seeks in part to boost significantly the supply of houses. It also requires Local Planning Authorities to identify a supply of land in excess of 5 years against a local housing requirement in adopted policies or against local housing need where strategic policies are more than 5 years old.

On 12th April 2019 the Council published an Interim Greater Norwich area housing land supply statement for the position at 1st April 2018. This showed that the Council could demonstrate a housing land supply of 6.63 years. This sets out the housing land supply position for Greater Norwich for the period 1 April 2018 to 31 March 2024. The interim statement has not been formally endorsed by all three Local Planning Authorities and is not the final statement that will be published in the Annual Monitoring Report (AMR) of the Joint Core Strategy for Broadland, Norwich and South Norfolk. The AMR will be published in due course. Notwithstanding the interim status of the statement, it is considered to be a credible assessment of housing land supply in Greater Norwich and has been carried out in a manner that is consistent with the expectations of the National Planning Policy Framework and Planning Practice Guidance. As such, the statement justifies the conclusion that a five year housing land supply can be demonstrated across the Greater Norwich area.

On this basis, paragraph 11 (d) of the NPPF is not engaged. The application would be determined in accordance with the development plan unless material considerations indicate otherwise. The remainder of this email looks at some of the issues we have discussed previously to explore what material considerations may be relevant to this proposal.

Housing Mix

Policy 4 of the JCS seeks to ensure developments provide a mix of housing to ensure balanced communities which meet the needs of the area as set out in the most up-to-date study of housing need.

I understand that it is proposed for half the site (approx. 100 dwellings) to be delivered by Scott Properties and this would focus on the delivery of bungalows. The rest of the site would be delivered by a development partner with a mix of more 'family orientated' dwellings. In accordance with JCS4 it is important for any proposal to provide a mix of housing which reflects the needs of an area. I am not aware of there being a specific need for bungalows in the area and if you are able to provide any evidence of need it would help to give the delivery of bungalows greater weight in the overall balance.

We have had discussions over the delivery of affordable housing on the site and for a development of this scale the policy requirement (JCS4) would be 33%, however we are giving weight to the 2018 SHMA which identifies a need for 28%. The Housing Enabler will provide you with a mix based should you require. The delivery of affordable housing would be a social benefit of the scheme with additional weight given to any provision over and above the policy requirements. We also discussed whether the proposal could deliver similar social benefits of affordable housing but in a 'different' way to provide additional benefit (such as the provision of a serviced piece of land for a community land trust to deliver housing). Whilst we are happy to have a dialogue around this issue, it is not a matter that I could commit to at this stage without the need for this being identified and there being local support to help deliver such a proposal.

Overall it is noted that Scott Properties seek to aim to address a 'niche' in the market through the delivery of bungalows but this will carry limited weight unless the benefits of this can be demonstrated through the application. Affordable housing would be a benefit of the proposal and provision above policy requirements would carry additional weight in the planning balance.

Location of the site

The site, whilst outside of the settlement limit, is in a sustainable location given the level of services within Taverham, many of which would be within a 1.5km radius and accessible by foot or cycle. Subject to the proposals providing appropriate foot and cycle connections to existing facilities I am of the opinion that the location of the site is sustainable for the scale of development proposed in terms of accessibility to services.

Landscaping

Policies 1 and 2 of the JCS and Policies GC4 and EN2 of the DMDPD seek to ensure that new development protects environmental assets, has regard to the characteristics of the area, landscapes and promotes high quality and contextually appropriate design and appearance, respecting local distinctiveness.

The development would result in the urbanisation of undeveloped land which is likely to result in some harm to the character and appearance of the area this would result in conflict with the above aforementioned policies. However, the site is not significant in landscape terms and the urbanisation of the site could be tempered by the retention of existing landscape features (which I note is proposed in the draft plans), housing densities to reflect existing development in the

surrounding area and high quality open spaces and new soft landscaping. Consequently, whilst there is likely to be some conflict with the development plan, I consider that the harm is not likely to be significant. The impact of the development on the non-designated heritage assets of Breck Farm and the Marriotts Way would need to be addressed through the planning submission by way of a heritage statement (or appropriate chapter in the planning/design and access statement).

Open Space

Policies RL1 and EN3 require the provision of formal open space (playing pitches, children's play space and allotments) and informal open space (green infrastructure). The amount required is contingent upon the number of people who would occupy a site. In the absence of a housing mix I am unable to be precise, but assuming an average occupancy of 2.5 people per dwelling the requirements for open space would be:

Sports pitches: 0.84 ha

Children's play space: 0.17 ha

Green infrastructure: 2 ha

Allotments: 0.080 ha

Based on the submitted plans, I note that a 5 acre (2.02 ha) extension to Hinks Meadow is proposed for sports pitches. This represents an over provision of sports pitches of 1.18 ha (subject to final housing mix). Provision above the policy compliant level could be regarded as a benefit of the scheme in the planning balance, but the weight to give to this would be dependent on whether this addresses any particular shortfall or meets a particular need. I advise that you speak with the Parish Council on this matter to understand from them whether there is local demand for such facilities or whether alternative recreational provision would provide greater benefit for local residents.

On a development of this scale I would expect the children's play space to be located on site, however the relationship of the site to Hinks Meadow is such that improvements could be made to the existing play equipment. Again, this is a matter that I would encourage dialogue with the Parish Council on to see if they would be happy to have improved play equipment on site or whether they would prefer this to be located on the application site.

The Green Infrastructure (GI) requirement is to mitigate the potential impacts of visitor pressure upon sensitively internationally designated sites (N2K sites). On a development of this scale it would be expected that the GI requirement is met on site. To meet the requirement the GI would need to provide an alternative to visiting N2K sites with well-connected areas of informal open space suitable for informal recreation. I am unsure from the plans you have provided what the amount of informal open space proposed is, however a number of the areas of open space are small, adjacent or bisected by the main estate road and fragmented. Whilst these would serve to create an attractive environment and help for the purposes of place making, I am not convinced that they contribute to a well-connected green infrastructure network. On this matter I have met with Graham McCormick and Drew Whittock with the Councils Green Infrastructure Officer (Annie Sommazzi) and we have provided some principles of how the site could better achieve its GI requirements through making better connections to existing tree belts, woodland walks and permissive paths in the area including the Marriotts Way and the recently consented scheme to provide public access through the Reephams Road tree belt. It is understood that there is land within the current holding or owned by Broadland District Council that would make these connections possible. The provision of GI is necessary to make the development acceptable and therefore does not represent an inherent 'benefit', unless the amount or quality of GI is above the policy compliant level, or if its delivery has wider public benefits.

Layout

Matters of layout are intrinsically related to the provision of open space the following comments should be read in light of the above comments. The proposed development and open space at the site access on to Fir Covert Road would help to provide a sense of place, however to my mind the frontage development should be rotated through 180 degrees to address Fir Covert Road. The hierarchy of roads appears logical with a main spine road (Type 2?) serving Type 3, Type 6 and private drives. A number of loops are provided to the northern section which would assist in the permeability of the site however this has not been carried through in the eastern part of the site, although I appreciate the existing tree belt and the north-south green corridor make this more difficult. The density reflects that of Thorpe Marriot to the south but is clearly more intensively developed than the loose knit ribbon development to the east of Fir Covert Road adjacent to which the site lies. Residential amenity would also be a key consideration of this part of the site.

I do not intend to comment on detail in terms of the vehicular access and will leave this to the highway authority to comment on who I understand you are already in discussions with. No doubt they would have comments on the layout also and I would be happy to discuss any issues they raise with you on that front. Vehicular access aside, pedestrian and cycle access should be provided to Hinks Meadow and Fir Covert Road and if possible to Thorpe Marriot estate.

Heritage

There are no designated heritage assets that would be affected by the proposals however Breck Farm and the Marriots Way to the east of the site are non-designated heritage assets, the setting of which would need to be considered in the submission of any application through a heritage statement (or appropriate chapter in a Planning Statement/Design and Access Statement).

Pre-app engagement

I would advise that as a minimum you engage with Taverham Parish Council. The Taverham Neighbourhood Plan steering group, the Highway Authority and the Lead Local Flood Authority.

CIL/Section 106 requirements

The development would be subject to CIL on the net floorspace. Taverham is in Zone A where the current rate (2019) for residential development is £106.47 sqm.

I anticipate that a section 106 would be required for affordable housing and open space.

Validation requirements

The list provided on page 12 of your pre-app document will need to be amended to include an ecological assessment and noise assessment. The application should also be supported by a 'shadow' HRA as the proposal is being brought forward outside of the development plan and there is the potential for development to have a significant impact on European Sites. In addition, the development will need to be supported by a viability assessment to demonstrate that the scheme as proposed is viable as this gives officers greater confidence in giving weight to some of the benefits.

Planning balance

There is a clear conflict with the development plan with the site being outside of a settlement limit and not in accordance with the locational policy GC2 of the DM DPD and the Council is able to identify a supply of land for housing in excess of 5 years. However in locational terms the site is sustainable for the scale of development proposed and whilst the development would impact the character and appearance of the area which is contrary to the development plan it is expected that the landscape impact would not be significant and the impact could be mitigated in part through high quality design and landscaping.

Planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise. Whilst contrary to the development plan it would seem as though there is limited harm associated with the proposal, however it will be necessary for the application to provide and evidence the benefits of allowing this scheme.

I hope that the above is of assistance to you and your client. You will of course appreciate that this response is provided without prejudice and at an officer level only. It is also provided without the benefit of full or formal consultation with all interested stakeholders. Do please contact me if you require any further advice or information.

Regards

Charles

Charles Judson
Senior Planning Officer



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