

## DELEGATED REPORT

Application Number	20181408
Parish	Horsford
Site Address	Land at Holt Road, Horsford
Proposal	Construction of 47 dwellings, access and associated open space (outline)
Recommendation	Refusal
	Outside settlement limits
	No overriding benefits

### Planning Policies

#### National Planning Policy Framework (NPPF)

NPPF 02 : Achieving sustainable development  
NPPF 04 : Decision-making  
NPPF 05 : Delivering a sufficient supply of homes  
NPPF 09: Promoting sustainable transport  
NPPF 11 : Making effective use of land  
NPPF 12 : Achieving well-designed places  
NPPF 15 : Conserving and enhancing the natural environment  
NPPF 16 : Conserving and enhancing the historic environment

#### Joint Core Strategy (JCS)

Policy 1 : Addressing climate change and protecting environmental assets  
Policy 2 : Promoting good design  
Policy 3 : Energy and Water  
Policy 4 : Housing delivery  
Policy 6 : Access and transportation  
Policy 8 : Culture, leisure and entertainment  
Policy 15 : Service Villages  
Policy 17 : Small rural communities and the countryside

#### Development Management Development Management Policies (DMDPD)

Policy GC1 : Presumption in favour of sustainable development  
Policy GC2 : Location of new development  
Policy GC4 : Design  
Policy EN1 : Biodiversity and Habitats  
Policy EN2 : Landscape  
Policy EN3 : Green Infrastructure  
Policy EN4 : Pollution  
Policy RL1 : Provision of formal recreation space  
Policy TS3 : Highway safety  
Policy TS4 : Parking guidelines  
Policy TS6 : Public safety zones  
Policy CSU5 : Surface Water Drainage

#### Neighbourhood Plan (NP)

##### Horsford Neighbourhood Plan (2018)

Policy COM2 : New outdoor recreation space  
Policy COM3 : Allotments  
Policy HBE1 : Mixed housing  
Policy HBE2 : Connectivity  
Policy HBE3 : High quality design  
Policy TRA1 : Walkable and bikeable community  
Policy TRA3 : Private parking  
Policy ENV5 : Trees and site boundaries

## **Statutory duties relating to Listed Buildings, setting of Listed Buildings and Conservation Areas:**

S16(2) and S66(1) Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant planning permission or listed building consent for development which affects a listed building or its setting, the local planning authority, or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

### **Planning History**

No relevant planning history

### **Consultations**

#### **Norfolk County Council as Highway Authority**

Having considered the proposed access strategy it is our view that the development is of a scale that could be served from a single point of access. The developer should consider options to remove access via the roundabout and create a single priority junction to the south from Holt Road. Further details are required to show revised access, visibility splays, footpath extension, pedestrian links including island refuge and appropriate crossing facilities. The applicant should investigate options for bus stop upgrades and provision of shelters. The proposed access should be 6m wide up to the internal link road. The internal link road should measure 5.5m wide. In order to enhance a sense of place and re-enforce an extended 30mph speed limit the layout should include frontage development onto Holt Road.

#### **Broadland District Council Section 106 Officer**

If approved, given its location some form of play space would be recommended on this site.

#### **Environment Agency**

No comments to make. The site is entirely within Flood Zone 1 and although within SPZ3 the site does not have any potentially contaminative previous use.

#### **Norfolk County Council as Lead Local Flood Authority**

The application is for less than 100 dwellings or 2 ha in size and is not within a surface water flow path as defined by the Environment Agency therefore it is outside the threshold for providing comments. However, the applicant should demonstrate compliance with the NPPF, the PPG, SuDs standards and LLFA standard guidance.

#### **Broadland District Council Conservation Officer (Trees and Landscape)**

A preliminary AIA has been undertaken acknowledging that a revised AIA, TPP and AMS will be required once a layout is available. There are discrepancies between the tree numbering and the drawing and this needs to be checked. The parkland trees are of high landscape value and should be retained. Overshadowing of existing trees will be significant and will determine the layout. Important views have been considered and further planting suggested to help mitigate the visual impact. Ground level changes as a result of NDR works have already had an impact on the health of some boundary trees. Tree survey work should be extended to include the area of the proposed footpath link. Overall, no objection to the proposed development if most of the significant trees are retained and protected and the layout is sympathetic to the tree constraints. Conditions requiring a revised AIA at full planning application stage should be included and conditions to cover the tree and landscape elements.

#### **Broadland District Council Pollution Control Officer**

I have read through the report submitted with the application and the following need to be considered. The removal of the asbestos cement roofing on the stable building, a condition to require details of removal and disposal of the roofing to ensure the waste material has been appropriately disposed of off-site. The area of the bonfire should be removed as recommended in the report and the area validated to show it is fit for use. Testing is required of the area currently being used to store building material to ensure the land in this

area is fit for use.

### **Broadland District Council Contracts Officer**

The applicant should construct the development in accordance with the new planning guidance notes relating to access, waste storage and collection points and street care.

### **Norwich Airport**

There is insufficient information for an accurate assessment of the impact the development would have on the safe operation of the airport. Therefore conditions should be applied to the outline planning permission. No structure to exceed 15m high, materials used should not interfere with technical and navigation equipment, lighting designed to prevent light spill, landscaping features to be designed to discourage birds, notification on any use of cranes during construction. Subject to conditions Norwich Airport do not object to the proposal.

### **Anglian Water**

There are no assets owned by AW within the development site. There is sufficient capacity for foul drainage from the site at Whitlingham Trowse Water Recycling Centre. Development would lead to an unacceptable risk of flooding downstream, however the applicant has prepared a drainage strategy to determine mitigation measures, a drainage strategy condition is required to confirm the foul water flows before development commences. Proposed method of surface water drainage does not relate to AW assets the advice of the EA or the LLFA should be sought.

### **Norfolk County Council as Historic Environment Officer**

We have reviewed the Heritage Statement and broadly concur with its conclusions in terms of potential for below-ground archaeology but strongly disagree with its conclusions in terms of effects on the significance of other undesignated heritage assets. The proposed development area remains grassed with a scatter of isolated trees and was parkland associated with Horsford Hall. The surviving parkland is regarded as an undesignated heritage asset and believes the proposal would cause harm of significance to the heritage. It is recommended that the application is refused. If approved pre-commencement conditions for investigation and mitigation measures should be applied.

### **Broadland District Council Housing Enabler**

33% affordable housing would be expected with a 60:40 tenure split for ART and Intermediate tenure which would meet NPPF requirements for affordable home ownership. ART units should meet or approach Level 1 space standards to ensure maximal occupation can be achieved for all affordable rental units. A mix of units should be provided through one to four bedroom houses including two wheelchair adapted bungalows. A third would be for local lettings.

### **Norfolk Constabulary Architectural Liaison Officer**

The application should seek to achieve full Secured by Design certification. As the site is greenfield there are opportunities to incorporate measures that fall within the definition of Crime Prevention Through Environmental Design. Layout should be visually open and included measures to define private and public spaces but avoid permeability. The layout should allow for natural surveillance, including open space areas and parking areas.

### **Natural England**

No comments to make. Standing advice should be followed to assess protected species, impacts on statutory designated nature conservation sites or landscapes.

### **Norfolk County Council Infrastructure**

The County Council would have serious concerns if funding for the following list of infrastructure requirements mitigating the impact of this development, could not be adequately addressed/delivered through CIL, S106 and/or condition.

- Education – Taking account the permitted planning applications in Horsford there would be spare Primary School capacity but there would be insufficient capacity in Early Education and High School sectors and funding for additional school places would be sought to accommodate the children from this development.

- Fire – Taking account of the location and existing infrastructure a minimum requirement based on 65 dwellings would be 2 fire hydrants on at least a 90mm main.
- Library – Development would increase pressure on Reepham Library and mitigation is required to develop a self-service system.
- Green Infrastructure – Connections into GI networks should be considered. Direct mitigation should be included in the development and new features funded by CIL.
- A new footpath along the western boundary is welcomed. Access to the wider landscape is limited by the A140 and the new A1270 to the south west, therefore an off road link to Horsford FP8 would offer new residents the opportunity to access the wider rights of way network and fulfils Objective 7 of the HNP.

### **Broadland District Council Historic Environment Officer**

This application seeks to develop the greater part of the original historic parkland to the south of Horsford Hall a Grade II Listed Building. Maps dating back to the mid 19<sup>th</sup> Century indicate that Church Street is the historic centre of the village. The heritage assets potentially affected by the development are Horsford Hall, The Church and Little Orchard, in addition to other non-designated heritage assets and the historic parkland.

The conservation of heritage assets is a core planning principle in the NPPF which states that 'heritage assets should be conserved in a manner appropriate to their significance'. The application fails to fully understand, identify and assess the heritage assets and historic environment and the effect caused by the new development.

It is considered that the setting of all the designated and undesignated heritage assets on Church Street would be adversely affected by the proposed development because it would be closed in by modern developments to the south making it impossible to experience the historic village setting in its current rural setting. This would fail to conserve and enhance the historic environment as required by the NPPF.

The significance of the former parkland which is the subject of the application would be substantially damaged and in addition less than substantial damage would be caused to Horsford Hall through development within this setting.

The former parkland should remain undeveloped, even if not restored to its historic status, to conserve the historic environment of Church Street as a rural village centre in the face of creeping urbanisation resulting from development from the fringe of the city.

### **Further comments on revised plans**

Whilst I do not agree with all the observations in the Heritage Statement, the most recent plan showing potential development areas minimises damage to the significance of nearby designated and undesignated heritage assets. The plan would restore an area of the original parkland setting to Horsford Hall and secure its future as public open space. The public benefit of this outweighs the now 'less than substantial harm'.

### **Broadland District Council Environmental Health**

No objections subject to the submission of a Construction and Environment Management Plan prior to commencement of works that details as a minimum, the management of construction noise and dust. It is also recommended that the permitted hours for construction work likely to be audible at the site boundary are restricted in order to protect the amenity of nearby residents.

### **Horsford Parish Council**

The Parish Council concluded that whilst they could not object in principle to the development of this site they wished to raise their concerns that:

- The development would be very soon after other major sites within the village without giving time for local infrastructure and facilities to adjust to the increased demand (schools, medical facilities, shops, transport, etc).
- The development would be on the fringe of the village and would not have good connectivity with residents having to cross busy roads to access village facilities.

- The final design should pay due regard to the ancient parkland and retain this ambience of open space and as many mature trees as possible.
- The ancient rookery at the junction of Holt Road and Church Street should be undisturbed.

The Council were totally opposed to the suggested access off the new roundabout and felt that a much safer option would be for access roads to be from the Holt Road cul-de-sac rather than creating a further arm on the roundabout.

### **District Councillor for Horsford**

Strongly object to the proposal. The site is old parkland and has very strong heritage factors to consider and is only one of a few remaining parts of Horsford which is totally undisturbed. The trees are very old and need preserving. The density of housing for the site is too great. Although there is a demand for housing there are more appropriate sites available. The site is isolated from the village with poor connectivity, which would increase vehicular movements in Horsford. The application does not comply with the Horsford Neighbourhood Plan Policies HBE2, TRA1 and TRA3. Area for drainage is very close to housing on Church Street and that in periods of heavy rainfall the cellar of Horsford Hall is prone to flooding.

### **Other Representations**

#### **Council for British Archaeology (Summarised)**

The site is an area of former parkland associated with the 18<sup>th</sup> Century Horsford Hall, a Grade II Listed former manor house that lies immediately north of the site. The CBA note the conclusions of the Archaeological Assessment and Heritage Statement and generally agree that they are a fair assessment of known archaeological potential. However on larger sites more intrusive investigations are required to provide more direct evidence of this potential to inform future mitigation measures.

The site makes an important visual and contextual contribution to the rural setting of Horsford through its aesthetic, communal and historic values. The CBA believes that the development would adversely impact on the rural setting of Horsford village and its heritage assets and result in loss of an important historic and archaeological resource.

The site is not suitable for housing as it will cause harm to sub-surface archaeological potential and the setting of Horsford village and its designated heritage assets. Outline planning permission should be refused, in part on heritage grounds. Should the application be approved the applicant should commission an archaeological evaluation of the site to further evidence the archaeological potential discussed in the Desk-based Assessment and Heritage Statement.

#### **CPRE (Summarised)**

CPRE objects to the application. The site is outside the settlement boundary of Horsford and development would be contrary to Policy GC2 of the DMDPD. The site is not allocated for housing and a greenfield site. The site provides a welcome buffer between Horsford and the Broadland Northway. The development would be contrary to Policy 15 of the JCS as unplanned further housing. A five year housing land supply can be demonstrated and there is no longer a need to allow housing outside settlement boundaries.

#### **Drayton Medical Practice**

As a busy 3 site medical practice that covers the proposed development we would like to highlight the strain extra housing is having on the medical practice. Several other areas in Horsford have already been given planning permission and have seen our list size increase quickly over the past few years.

At present we are struggling to provide enough space to see existing patients. Additional housing will undoubtedly increase pressure on the practice. Please take this into consideration when processing the application.

### **Neighbour Representations**

Twelve letters have been received from residents and neighbour raising a number of objections and comments. These are summarised as follows: -

- Concerns about the quality and type of proposed houses that would not be in keeping with the area.
- Concerns about increasing levels of traffic.
- Safety of pedestrians due to proximity and type of traffic.
- Decrease in air quality due to traffic.
- Disturbance to Rookery on the corner of Church Street and Holt Road
- Increased risk of flooding.
- Impact for wildlife.
- Potential loss of significant trees.
- Inadequate infrastructure (doctors, schools, public transport, road access) for additional residents.
- Development will not be in the village and will be excluded from the community.
- Access from the existing roundabout is dangerous due to levels of traffic.
- Footpaths into the village are too narrow.
- There are no safe crossing points for pedestrians to access village services.
- The site is an historic parkland and core of the village.
- The only part of the village that has remained undisturbed.
- Significant archaeological remains have been recorded on the site and there is potential for more.
- Peak time traffic is much heavier since the NDR more homes would add to the congestion.
- Local doctors are already stretched.
- The development would have an impact on the setting of Horsford Hall and surrounding area.
- Parking is already a problem on Church Street.
- Access to the site should be as existing on Holt Road.
- There is no safe pedestrian access or crossing point into Horsford.
- A more detailed traffic impact assessment is required.
- Change to the character of the area.
- Loss of privacy and overlooking.
- Unacceptable to lose more green space.
- Concerns about smells and noise from adjacent farm.
- Concern about impact of residential use on nearby animals.
- Horsford has already had too much development.
- Safety of junction with additional traffic.
- Site could be contaminated from animal carcasses.
- Concern about construction noise.
- The parkland is an important heritage asset.
- Development is contrary to the Horsford Neighbourhood Plan

#### **Further comments following re consultation**

- Contents of revised Heritage Statement is skewed to favour developer
- Disagree that there are no significant features within the parkland
- The topography of the land has been ignored as it slopes steeply and any development would be highly visible from Church Street.
- Contribution the site makes to the setting of the Church has not been assessed.
- The degree of harm is subjective.
- Adjacent livestock will create undesirable living conditions for future occupants of the site and concerned about potential repercussions for the farm business as a result of complaints.

#### **Assessment**

#### **Background**

This application seeks outline planning permission for the erection of up to 47 dwellings on land to the south of Horsford with access from Holt Road. All other matters are reserved although a Master Plan has

been submitted which indicates the proposed development areas and location of open spaces. The applicant originally indicated a scheme for 65 dwellings but following comments from the Historic Environment Officer and Landscape Officer this number was reduced.

The site is roughly triangular in shape of approximately 3.5 hectares in area and has an incline of approximately 6m from north to south. It is bordered by residential development on Church Street to the North, which includes Grade II Listed Horsford Hall. Church Street forms the southern edge of Horsford village. To the east is open farmland, with farm buildings associated with Home Farm, located to the southern tip of the site. The western boundary is formed with Holt Road, now a cul-de-sac and extends beyond the roundabout linking Horsford to the recently constructed Broadland Northway. All Saints Church is visible from the site through to the northern side of Church Street.

The site accommodates three outbuildings including an indoor swimming pool building. There is a small copse in the north east corner of the site and a number of trees scattered across the site together with an established hedge along the western boundary. The land currently has three distinct areas. The northern third is maintained as residential amenity land, the middle section is open grassland and the southern third is fenced off and used in part as grazing land and includes a stable building adjacent to the western boundary and close to the existing access.

The site is located within Flood Zone 1 according to the Environment Agency Flood Map and therefore in an area that is least vulnerable to flooding.

The site is classified as Grade 3 Agricultural Land (good to moderate) and is identified as Woodland Heath within the council's Landscape Character Assessment.

### **Principle of Development**

Planning law (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. Material considerations include the National Planning Policy Framework (NPPF).

In accordance with both the Council's adopted development plan and the NPPF, in cases where there are no overriding material considerations to the contrary, development proposals for housing that accord with the development plan should be approved without delay.

The application site is located outside of the settlement boundary as defined by the Development Plan and for the purposes of planning policy the site is defined as being in the open countryside. In this regard, consideration should be given to Policy GC2 of the DMDPD which makes provision for development to be granted outside of settlement limits, such as this, where development does not result in any significant adverse impact and where it accords with a specific allocation and/or policy of the development plan.

The northern boundary of the application site directly abuts the edge of the defined settlement. Horsford is identified as a Service Village by Policy 15 of the Joint Core Strategy (JCS), which states that land will be allocated for small-scale housing development for each Service Village. The policy relates to allocations rather than windfall development and the application site and number of proposed dwellings in this case are not considered small-scale.

Policy 15 of the JCS also identifies Horsford as one of the Service Villages that may be appropriate for additional development to help deliver smaller sites in the Norwich Policy Area (NPA) as set out by Policy 9 of the JCS. In the Broadland part of the NPA, allocation of smaller sites to deliver 2000 dwellings will be made in accordance with the settlement hierarchy. Policy 9 of the JCS explicitly refers to allocations.

The current proposal by virtue of its location, size and proposed number of dwellings is not considered to meet the requirements of Policy GC2 of the DMDPD or Policies 9 or 15 of the JCS.

In terms of establishing whether there are any overriding benefits will be confirmed following an assessment of all the harms and benefits of the scheme. Where development proposals do not accord with the development plan, consideration should be given to whether there are material considerations that otherwise indicate that development should be approved.

### **Five Year Housing Land Supply**

The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments January 2014. The JCS became five years old on 10 January 2019. Although the Greater Norwich authorities have commenced work to replace the JCS, the current plan has not been reviewed in line with the PPG to demonstrate that the housing requirement does not require updating. Publication of a 2017 SHMA had already indicated the need to update the housing requirement. In accordance with NPPF paragraph 73, the Greater Norwich housing land supply must be measured against local housing need (LHN).

The revised NPPF also introduced the Housing Delivery Test (HDT) as an annual measurement of housing delivery. The results of the first HDT were published on 19 February 2019. Broadland, Norwich and South Norfolk are measured jointly for the purposes of the HDT. The results of the HDT show that Greater Norwich has delivered 133% of the number of homes required between 2015/16 and 2017/18.

Policy 4 of the JCS sets out a three-district requirement, within which a policy decision was made to focus new allocations within a Norwich Policy Area. However, the HDT is measured jointly across all of Broadland, Norwich and South Norfolk and LHN figures are only provided on a district basis, which can be aggregated up in accordance with Planning Practice Guidance. Therefore, it is not possible to produce housing land supply information as measured against LHN for the Norwich Policy Area. As the 2017 SHMA indicated that the majority of the three districts are within the same housing market area, it is considered appropriate to measure land supply across this area. This approach effectively replaces that of separately measuring housing land supply across the Norwich Policy Area and Rural Policy Area of Broadland and South Norfolk.

As such, consideration must be given to the supply of land for housing in the Greater Norwich Area. The most recent Greater Norwich statement on five-year housing land supply was published as Appendix A of the Annual Monitoring Report (AMR) 2017-2018. This statement shows that there is currently 6.54 years housing land supply within the Greater Norwich Area. Given that there is a five-year supply of housing land, this application must be considered in the context that it is contrary to Policy GC2 of the DM DPD. Taking account of the above, it is considered that the Development Plan is not out of date and that there is no demonstrable deficit in the supply of housing land.

### **Connectivity**

The NPPF requires sites to have good connectivity with accessible local services. Horsford is classified as a service village at Policy 15 of the JCS and as such has a range of services and facilities to support development including a primary school, a shop/post office, a pharmacy and a village hall. However as previously noted the site is located outside of the defined development boundary for Horsford and given the site's peripheral location relative to the village centre and the requirement for pedestrians to cross a busy road/junction at Church Street and Holt Road, it is unlikely that future occupants would walk into Horsford for day-to day needs or use public transport for wider needs. The development is contrary to the aims of Policy HBE2 of the Horsford Neighbourhood Plan, Policy 1 of the JCS and Policy GC2 of the DM DPD.

Notwithstanding the principal objections as set out above cannot be overcome, if the site were allocated for development or located within the defined settlement limits, the details in support of the outline planning application do demonstrate that the proposal could be policy compliant in most other aspects, subject to further details. These matters are assessed below.

### **Open Space**

Policy RL1 of the DM DPD requires development consisting of five or more dwellings to make adequate provision for recreation. The application proposes to provide approximately 1.8 hectares of on-site open space, which is well in excess of policy requirements. The on-site open space would be available to the wider community and the applicant has indicated that it may also offer the use of the site to local football teams to address an identified shortfall in local provision for football pitches, however the location of the site is detached from the rest of the village and not easily accessible to everyone. Use of the open space for football training would not necessarily preserve the parkland feel and could introduce an intensity of use that could have a detrimental impact on existing and proposed residents. Off-site contributions would also be secured for Green Infrastructure through the completion of a Section 106 Agreement.

### **Affordable Housing**

Policy 4 of the Joint Core Strategy requires sites of 16 or more dwellings to provide 33% affordable housing. The applicant has indicated that the site would be able to provide 36% on-site affordable



housing although the above policy delivery has not been evidenced by any viability assessment to be certain that this would be achievable. Any affordable housing would need to be secured by the completion of a Section 106 Agreement. The development is therefore compliant with Policy 4 of the JCS and furthermore is compliant with the aims of Policy HBE1 of the Horsford Neighbourhood Plan.

### **Impact on Trees**

The application site includes several mature trees scattered across the site and around the boundaries of the site. As the application is outline only a preliminary Arboricultural Impact Assessment (AIA) has been undertaken which considers the existing trees and some of the constraints associated with them. A revised AIA, Tree Protection Plan and Arboricultural Method Statement would be required at detailed layout stage.

The site contains eight significant parkland trees, six of which are category A and these have high landscape value and would need to be retained and incorporated into any future layout. The application includes an indicative drawing that identifies potential areas for development and indicates the proposed location of the open space to the north and west of the site. In general, the trees are to be retained and the tree survey considers their condition to be fair to good across the site. Overshadowing from existing trees is likely to be a further constraint for the layout of housing on the site and would need to be considered further.

From a landscape perspective it is acknowledged that areas of the site will be sensitive to change and views towards the church have been considered. Buffer planting has been suggested and the intention is to retain the majority of the existing boundary trees.

In total 6 individual trees are to be removed and a section of hedgerow to make room for the proposed access and internal roadway but the most significant trees are shown to be retained and subject to adequate protection and a layout that is sympathetic to the tree constraints it is considered that there would be no significant impact upon the landscaping of the site.

Subject to a revised AIA at the full application stage that covers the woodland to the north of the site and landscaping conditions to cover tree and landscaping element of the site the proposal is not considered to conflict with the requirements of Policies GC4 and EN2 of the DM DPD or Policy ENV5 of the Horsford Neighbourhood Plan.

### **Impact on the Setting of the Listed Buildings**

The application seeks to develop the greater part of the original historic parkland to the south of Horsford Hall a Grade II Listed Building. Horsford is now a substantial settlement but maps dating back to the mid-19<sup>th</sup> Century indicate that Church Street is the historic centre of the village. At that date there were two further small groups of buildings along the Holt Road to the North of Church Street and these together with the development around Church Street were the full extent of the village. In addition to Horsford Hall, Church Street is also the location of the Grade II\* Listed Church and Grade II Listed Little Orchard.

The heritage assets potentially affected by the application include these listed buildings but in addition the other undesignated buildings in the historic village centre as well as the historic parkland which is the subject of the application.

The conservation of heritage assets is a core planning principle under the NPPF which states that 'heritage assets should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations'.

Originally, the application failed to fully understand, identify and assess the heritage assets (both designated and undesignated) and historic environment in the vicinity of the proposed development and the effect on the assets and their settings and the historic environment that would be caused by the proposed development.

It was considered that the setting of all the designated and undesignated heritage assets on Church Street would be adversely affected by the proposed development because it would have resulted in Church Street being enclosed by modern development to the south making it impossible to experience the historic village setting in its current rural setting. This would have failed to conserve and enhance the historic environment as required by part 16 of the NPPF.

The significance of the former parkland which is the subject of the application would have been substantially damaged and in addition less than substantial damage would have been caused to Horsford Hall through development within its setting.

Through negotiations with the applicant, the proposed development area has been reduced in size and as a result decreasing dwelling numbers from 65 to 47, in order to avoid not only the trees but also to avoid key views between the site and Horsford Hall, Grade II Listed and views through to the Church located on Church Street to the north. A large area of open space has been retained at the back of Church Street which keeps the area free from development and allows views of the Church and maintains the setting of Horsford Hall, albeit of reduced scale.

The Conservation Officer has agreed that the proposed development area achieves a suitable compromise between allowing development of the site to take place while protecting important heritage assets. The plan would restore an area of the original parkland setting to Horsford Hall and secure its future as public open space. The public benefit of this outweighs the less than substantial harm that the revised scheme would cause to the significance of the heritage assets.

### **Neighbour Amenity**

Although no details of the proposed dwellings are provided in this outline planning application the indicated development areas are located away from neighbour boundaries. The proposed open space and planting along the northern boundary creates a degree of separation that would protect the properties on Church Street against loss of privacy and overlooking. Site levels incline from north to south and therefore views of new dwellings will be possible from rear windows of these properties but due to retention of mature trees the visual impact will be less than significant. Having regard to the separation distance and enhanced boundary planting the development of the site would not conflict with the requirements of Policy GC4 of the DM DPD.

### **Highways**

Vehicular access to this site is proposed via an existing single access point from Holt Road, which lies to the south of the existing roundabout. Norfolk County Council as Highway Authority has provided comments on this application and have confirmed that they would not object to this application if appropriate vehicular access and suitable pedestrian links can be delivered. In order to make the development acceptable detailed drawings to include appropriate visibility splays, an extension of the existing footpath/cycleway across the whole site frontage and up to Church Road and suitable crossing facilities across Church Road would need to be provided. Pedestrian links to Horsford, including an island refuge crossing and upgrading of the nearby bus stops with shelters would also be required.

The applicant has indicated that these measures would be included in any detailed application including the provision of a safe crossing point across Church Road to provide a pedestrian link from the site into the village. Having regard to the intention to meet highway requirements it is considered the development of the site would not conflict with the requirements of Policy TS3 of the DM DPD or Policy TRA1 of the Horsford Neighbourhood Plan.

### **Flood Risk**

Policy CSU5 of the DM DPD requires consideration of foul and surface water drainage matters for all applications. A Flood Risk Assessment has been produced to accompany the application which concludes that the site is at low risk of flooding and would not cause flooding outside the site. Comments have been received from Anglian Water and Lead Local Flood Authority requiring conditions in relation to both foul drainage and surface water drainage. A drainage strategy would be required at detailed application stage. Subject to these conditions being included the proposal is not considered to conflict with the requirements of Policy CSU5 of the DM DPD.

### **Other Matters**

The applicant has cited additional benefits that could be achieved with the development of the site. As discussed above the parkland has been promoted for use by local football groups for training purposes. In addition to this the applicant has stated that parking could be provided on the site for the church and its associated community groups. However, this would appear to be impractical given the location and disconnection from Church Street and the village even with the provision of a footpath and safe crossing points. It is difficult to see how this could be of wider public benefit to justify the proposed development.

Under Section 143 of the Localism Act the council is required to consider the impact on local finances. This can be a material consideration but in the instance of this application the other material planning considerations detailed above are of greater significance.

This application is liable for Community Infrastructure Levy (CIL).

## Conclusion

The proposed development is outside the development boundary in an area which is disconnected from services and facilities. The Council is able to demonstrate a five year housing land supply against the requirements of the JCS. The proposal is not considered to represent sustainable development, and as a result would be contrary to the requirements of Policy 1 of the Joint Core Strategy and Policies GC1 and GC2 of the Development Management DPD.

It is acknowledged that the proposed scheme could deliver affordable housing and publicly accessible open space above policy requirements. The proposal would also contribute financially to CIL and through Section 106 contributions. It is also acknowledged that the site could provide other community benefits in the form of recreation and parking. Short term and longer term economic benefits are recognised through the construction of the development to new resident's expenditure in the village. However, these benefits do not override the principal policy objections as discussed above. The application is therefore recommended for refusal.

## Reasons for Refusal

1. Horsford is defined as a Service Village under Policy 15 of the JCS. Such villages have been defined based on having a good level of services and facilities. Horsford contains a range of services and facilities including a primary school, a shop/post office, a pharmacy and a village hall. Given the site's peripheral location relative to the village centre and the requirement for pedestrians to cross a busy road/junction at Church Street and Holt Road, it is unlikely that future occupants would walk into Horsford for day-to day needs or use public transport for wider needs.
2. The site is located outside of any defined settlement limits and is consequently considered to be an unsustainable location for any further development. Policy GC2 of the DM DPD does not permit new development outside of the settlement limits unless the proposal complies with a specific allocation and/or policy of the development plan. The proposal does not comply with a specific allocation and does not comply with any housing policies in the development plan.
3. Furthermore, the Annual Monitoring Report (AMR) of the Joint Core Strategy for Broadland, Norwich and South Norfolk for 2017-18 was published in October 2019. The AMR includes the Greater Norwich Area Housing Land Supply Assessment (HLS) at 1st April 2018, which sets out the housing land supply position for Greater Norwich for the period 1st April 2018 to 31st March 2024. The AMR HLS demonstrates that a 6.54 year housing land supply can be demonstrated across the Greater Norwich area.
4. The development is not supported by any specific Development Management policy which allows for development outside of the development boundary and nor does it represent overriding benefits when having regard to the harm identified above. The site is consequently considered to be an unsustainable location for new development and is considered to fail to comply with Policy 1 of the JCS and Policies GC1 and GC2 of the DM DPD.

In my opinion, this proposal satisfies the scheme of delegation and does not need to be reported to committee.

All periods of publicity (Site Notice, Press Notice and Consultee response time limits) have expired.

Case Officer: JF

Dated : 30/03/2020