

Representations on the GMLP Regulation 19 Publication on behalf of Mr Carl Palmer

Introduction

- 1 These representations are made in connection with site GMLP0283 and GMLP0283R – land at Holt Road, Horsford (“**Site**”) on behalf of Mr Carl Palmer.
- 2 Representations on the Stage C Regulation 18 Draft Strategy and Site Allocations Consultation dated March 2020 in support of the allocation of the Site for residential development were made on behalf of Mr Carl Palmer by Malcolm Dixon of MDPC Ltd (“**Reg 18C Reps**”). A copy of these representations and its enclosures are at **Appendix 1**.
- 3 GMLP0283R represents the proposals for the Site which were put forward in the representations on the Regulation 18C consultation.

Background

- 4 The Housing and Economic Land Availability Assessment (HELAA) Addendum III (December 2020) sets out the following in connection with GMLP0283R:
 - 4.1 Constraints Analysis – Site Access is considered “Amber” but Accessibility to Services, Utilities Capacity, Utilities Infrastructure, Contamination and Ground Sustainability, Flood Risk and Market Attractiveness are all considered “Green”.
 - 4.2 Impacts Analysis – Sensitive Townscapes and Historic Environment are considered “Amber” but Significant Landscapes, Biodiversity and Geodiversity, Open Space and GI, Transport and Roads and Compatibility with neighbouring uses are all considered “Green”.
 - 4.3 The HELAA site suitability conclusions for GMLP0283R recognise that issues identified for consideration are important but not absolute constraints so the site is concluded as suitable for the land availability assessment.
 - 4.4 For the purposes of the HELAA capacity assessment, GMLP0283R is considered to be “Suitable”.
- 5 The “Horsford Booklet” in the Village Clusters – Broadland Assessment Booklets which sets out the assessment of sites included within the draft local plan Regulation 18C consultation (January – March 2020) states the following in connection with the Site:
 - 5.1 GMLP0283 is considered “Amber” for Site Access, Utilities Capacity, Sensitive Townscapes, Historic Environment and Transport & Roads with Access to Services, Utilities Infrastructure, Contamination/Ground Stability, Flood Risk, Market Attractiveness, Significant Landscapes, Biodiversity & Geodiversity, Open Space and GI and Compatibility with Neighbouring Uses considered “Green”.
 - 5.2 GMLP0283R is considered “Amber” for Site Access, Sensitive Townscapes and Historic Environment with Access to Services, Utilities Capacity, Utilities Infrastructure, Contamination/Ground Stability, Flood Risk, Market Attractiveness, Significant Landscapes, Biodiversity & Geodiversity, Open Space and GI, Transport & Roads and Compatibility with Neighbouring Uses considered “Green”.

This change in assessment (as recognised in the HELAA) demonstrates the positive changes that have been made to the proposals for the Site through the Application (see below) and the proposals for the Site as set out in the Reg 18C Reps.

- 5.3 The “draft” GNLP response to the Reg 18C Reps at Part 2 of the Horsford Booklet is that the Site is not *“particularly well located”* and that it is *“distant from services and facilities in the village”*.
 - 5.4 Despite the above, the Part 3 – Stage 4 discussion of new and revised sites sets out that the site was not originally shortlisted in the site assessment booklets as it was considered *“not to be accessible or within walking distance of facilities in the village, separate from the built edge of the settlement and too large for the strategic requirement”*.
 - 5.5 However, this assessment goes on to state that in light of the additional information submitted regarding connectivity (with the enclosed Reg 18C Reps) and proposals for a 25m stretch of footway/cycleway link to the village, the Site is now considered to be reasonable to shortlist to allow for further discussion to take place regarding the additional evidence submitted.
 - 5.6 The Part 3 – Stage 5 shortlist of reasonable alternative new & revised sites for further assessment considers GNLP0283R as being a “reasonable alternative” for housing.
 - 5.7 The Part 3 – Stage 7 initial conclusions on suitability of new and revised sites for allocation sets out that GNLP0283 and GNLP0283R are not considered to be reasonable for allocation as the Site is separate from the built edge of the village and development here would be quite remote from the services and facilities in the main part of the village. These conclusions also find that there would be no safe walking route to Horsford Primary School.
- 6 The only new housing allocation proposed in Horsford is GNLP0264 which allocates a 1.78ha site at Dog Lane, Horsford for 45 homes. This proposed policy requires development to have vehicular access from Horsbeck Way, provide an enhanced pedestrian crossing facility and to modify the access to enhance pedestrian facilities and walk to school routes and as this site intersects a watercourse a WFD compliance assessment for the watercourse receiving run off would be needed as would a 20m buffer between the watercourse and gardens.
- 7 GNLP0264 is considered as follows in the “Horsford Booklet”:
- 7.1 “Amber” for Site Access, Utilities Capacity, Contamination/Ground Stability and Flood Risk; and
 - 7.2 “Green” for Sensitive Townscapes, Historic Environment and Transport & Roads with Access to Services, Utilities Infrastructure, Market Attractiveness, Significant Landscapes, Biodiversity & Geodiversity, Open Space and GI and Compatibility with Neighbouring Uses.
- 8 The reason for allocating GNLP0264 (as set out at Appendix A of the Site Assessment Booklets) are that this site is a *“brownfield site, well related to the form and character of Horsford although the proximity to remaining industrial uses will need to be considered”*.

Planning history of the Site

- 9 An outline planning application (ref: 20181408) for the development of the Site for 47 dwellings, access and associated open space (“**Application**”) was refused by Broadland District Council on 26 March 2020.

- 10 There was no objection to the Application by technical consultees on issues such as highways, heritage, trees, ecology or flood risk and drainage.
- 11 A copy of the Delegated Report dated 30 March 2020 (“DR”) for the Application is at **Appendix 2**.
- 12 When considering the issue of “connectivity” the DR comments that “...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.”
- 13 A planning appeal was lodged in September 2020. A “start letter” for this appeal was issued by the Planning Inspectorate on 11 February 2021 and a decision on this appeal is expected in the first half of 2021.

Representations on the Regulation 19 Publication

Policies 7.3 and 7.4 – The Key Service Centres and Village Clusters

- 14 Policy 7.3 provides for Acle, Blofield, Brundall, Hethersett, Hingham, Loddon/Chedgrave, Poringland/Framlingham Earl, Reepham and Wroxham to be recognised as Key Service Centres to provide 3,679 homes and around 7% of the proposed housing growth.
- 15 The supporting text to Policy 7.3 says that Key Service Centres have a “*relatively good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas*”.
- 16 Policy 7.4 proposes to recognise Horsford as a part of a village cluster along with Felthorpe and Haveringland.
- 17 The supporting text for Policy 7.4 states that village clusters are based on primary school catchments which provide a proxy for social sustainability. The supporting text also says that to reduce additional car journeys and encourage healthy and active lifestyles, new housing allocations have been preferred on sites within village clusters with good access to a primary school and a safe route to school.
- 18 For the reasons set out in the enclosed Reg 18C Reps, we maintain that Horsford should not be part of a “village cluster” and should instead form part of a Key Service Centre.
- 19 In addition, for the reasons set out below, we maintain that the Site does have a safe walking route to Horsford Primary School and the rationale for not allocating the Site for residential development on the basis it could not provide a safe walking route to school is flawed.
- 20 Horsford is the 9th largest settlement in the Greater Norwich area has a range of services which are comparable with other identified Key Service Centres. Indeed, of the proposed Key Service Centres, only Hethersett and Poringland/Framlingham Earl have a larger population than Horsford.
- 21 Horsford is not subject to any particular development constraints.
- 22 This should be contrasted with Blofield, Brundall, Poringland/Framlingham Earl and Reepham where high amounts of existing commitment and environmental and infrastructure constraints limit the potential for additional housing growth. In addition, traffic constraints and proximity to the Broads at Wroxham restricts growth in that settlement. As a result the focus of additional growth identified is at Acle, Hethersett, Hingham and Loddon/Chedgrave.

- 23 By failing to recognise Horsford as a Key Service Centre and allocate greater housing growth here – where it could be accommodated – the plan therefore needs to locate additional housing in smaller and less sustainable settlements.
- 24 Paragraph 8 of the National Planning Policy Framework (“**Framework**”) sets out that achieving sustainable development means (amongst other things) ensuring that sufficient land of the right types is available in the right places and at the right time to support growth and ensuring that a sufficient range of homes can be provided to meet the needs of present and future generations, with accessible services and open spaces.
- 25 Paragraph 16 of the Framework (and section 39(2) of the Planning and Compulsory Purchase Act 2004) requires local authorities to prepare their development plans with the objective of contributing to the achievement of sustainable development.
- 26 For the reasons set out in these representations and the Reg 18C Reps, the development of the Site for residential purposes would help achieve the economic, social and environmental objectives set out in paragraph 8 of the Framework and help achieve sustainable development as a result.

Failure to allocate GNLPO283 or GNLPO283R for residential development in Part 2 – The Sites (Horsford, Felthorpe and Haveringland)

- 27 In Part 2 – The Sites, Horsford, Felthorpe and Haveringland (paragraphs 6.63 – 6.67) it is said that approximately 20 – 50 new homes are appropriate to the Horsford cluster. This text also comments that in addition to a primary school, this cluster includes a shop, doctor’s surgery, village hall, library and public house.
- 28 For the reasons set out above, it is considered that Horsford should be considered for greater additional housing growth than 20 – 50 new homes.
- 29 The conclusions on the suitability of GNLPO283 and GNLPO283R for allocation in the “Horsford Booklet” were that the Site is:
- 29.1 separate from the built edge of the village;
- 29.2 development here would be quite remote from the services and facilities in the main part of the village; and
- 29.3 there would be no safe walking route to Horsford Primary School.
- 30 These conclusions are unsubstantiated and do not withstand scrutiny. The decision not to allocate the Site for these reasons is not justified and is unsound.
- 31 The Site directly joins the existing built edge of the village of Horsford.
- 32 Outline planning permission for the development of 84 dwellings to the west of Holt Road, Horsford was granted on 26 February 2018 (ref: 20170409), reserved matters were approved on 1 February 2019 (ref: 20181136) and this development is being constructed. A copy of these decisions and key approved plans are at **Appendix 3**. The Site is close to this development and this reinforces that the Site will not be remote from the built edge of Horsford.
- 33 The development of the Site would deliver both vehicular and pedestrian/cycle routes to Horsford.
- 34 The Canham Connectivity Assessment (9 March 2020) submitted with the Reg 18C Reps demonstrates that development of the Site would be able to deliver a footway/cycleway link to allow pedestrian and cycle movements northwards towards the centre of Horsford.

- 35 The Canham Assessment demonstrates that a primary school, a local shop, medical centre, post office, village hall, pharmacy, recreation ground, public house, place of worship and bus stop would all be within a 20 minute walk of the Site.
- 36 The Site is within 2 miles of both primary schools in Horsford and should be considered within an acceptable walking distance to these. The Canham Assessment notes that the standard distance to schools in Norfolk (outside of Norwich) is 7 miles.
- 37 At section 3.5 of the Canham Assessment particular consideration is given to the walking route from the Site to Horsford Primary School. It is concluded that a safe walking route to local schools is available from the Site. The assessment of the Site as not having a safe walking route to Horsford Primary School in the “Horsford Booklet” is not correct and this should not be a reason not to allocate the Site for residential development.
- 38 In addition to this, the Site is positioned in an excellent location for access to the Broadland Northway and development in this location would mean that vehicles would not need to travel through the settlement of Horsford to access this road. That sets the Site apart from the development proposed to the north of Horsford. Further, the Site is located close to the proposed 81.5 hectare key strategic employment site at Norwich Airport.
- 39 The allocation of the Site for residential development would support the GNLP growth strategy and could comply with the Policy 2 – Sustainable Communities requirements for new development.
- 40 As demonstrated through the Application and the conclusions in the DR, there are no technical constraints to the delivery of residential development on the Site.
- 41 Paragraph 31 of the Framework requires the preparation of development plan policies to be *“underpinned by relevant and up-to-date evidence”*. The information provided by the Canham Assessment and the work that has been carried out in support of the Application (which led to no objections to the development of the Site in technical terms as confirmed in the DR) is such evidence. It appears that the latest version of the “Horsford Booklet” fails to take this evidence into account in its conclusions as to the suitability of GNLP0283 and GNLP0283R for allocation.
- 42 Paragraph 35 sets out that for plans to be “sound” they must (amongst other things), be justified and based on proportionate evidence and consistent with the policies in the Framework. As a result of the points above, we question whether the plan is “sound” in this regard.
- 43 The Site is capable of delivering market and affordable dwellings and a substantial amount of open space/green infrastructure in the short term and certainly within the first five years of the plan period.
- 44 It is considered that the Site represents a location for sustainable residential development and should be allocated for housing in the GNLP.
- 45 The enclosed Reg 18C Repls (and particularly the Canham Assessment) comment on the proposed allocation of site GNLP0264 at Dog Lane in Horsford and compare this with the Site.
- 46 As noted in the Canham Assessment, part of GNLP0264 is located within Flood Zone 2, GNLP0264 lies directly adjacent to an MOT testing centre and vehicle repair shop and – like the Site – works would be required to enhance pedestrian facilities and walk to school routes.
- 47 In passing we note that it remains unclear why the “Horsford Booklet” and the HELAA considered that GNLP0264 as “Green” for “Compatibility with Neighbouring Uses” given its

location directly adjacent to existing industrial uses (namely an MOT testing centre and vehicle repair shop). This is particularly so given Appendix A to the “Horsford Booklet” draws attention to the fact that *“proximity to remaining industrial uses will need to be considered”* for any development coming forward on GNL0264.

Howes Percival

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