
Site Reference SN4042 Representation

Date: July 2021.

Site: Land to the north of Norwich Road, Morley St Peter.

Client: Collins and Clark Developments (Morley) Limited.

Revision Schedule

Site Representation – SN4042 Land to the North of Norwich Road, Morley St Peter.

Project Reference Number: 1819

Rev	Date	Details	Prepared by	Reviewed by	Approved by
00	28 th July 2021	Draft	Heather Byrne Senior Planning Consultant	Debi Sherman Director of Planning	Debi Sherman Director of Planning
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QUESTION 86: Do you think that any of the rejected sites should be allocated? Please add additional comments to explain your response and please specify which site(s) you are referring to.

This representation has been prepared by One Planning Consultants on behalf of Collins and Clark Developments (Morley) Limited in response to the Village Clusters Housing Allocations Plan – Reg 18 Draft 2021 Consultation. The consultation includes the South Norfolk Village Clusters Housing Allocations Plan and supporting documents including Map and Site Assessment Booklets for each cluster, including Morley and Deopham. This representation is in support of Land to the north of Norwich Road, Morley St Peter (Site Reference SN4042).

This representation considers the Assessment of the site within the current Consultation documents and seeks to address the concerns raised and demonstrate that the site should be considered for allocation as part of the South Norfolk Village Clusters Housing Allocations Plan. The following Statement demonstrates how the site can be brought forward for development to meet the housing requirements of the village cluster within the plan period and provides a detailed appraisal of the site, supported by technical documents, to evidence how the site is available, suitable and achievable in accordance with the NPPF.

Morley and Deopham form a village cluster in the emerging South Norfolk Village Clusters Housing Allocations Plan and contain a preschool, primary school, village hall and playing fields, public house, and Wymondham College. The existing development along Hill Road to the west of the site also adjoins development within Besthorpe, which is located within Breckland District Council. Besthorpe contains a Plant Centre and farm shop, brewery (The Wolf brewery), and two employment areas – Besthorpe Trading Estate and Rookery Business Park. Public transport links are provided to the south of the site along Norwich Road by a regular bus linking the site within the neighbouring towns of Attleborough and Wymondham as well as Norwich and surrounding rural settlements. Attleborough and Wymondham contain a wide range of employment, educational, shopping and other facilities and services to meet the day to day needs of local residents. They also contain train stations providing rail access to Norwich, London and beyond. The introduction and Background section of the Plan states *'the main aim of the Plan is to allocate a series of smaller sites, typically within the range of 12 to 50 homes, across the 48 Village Clusters in South Norfolk, to accommodate at least 1,200 new homes in total.'*

The Assessment Booklets for each Village Cluster considers the sites which have been put forward to date for residential development and outlines whether each site is a preferred allocation, shortlisted (or reasonable alternative) or rejected (unreasonable) site allocation. This Consultation is seeking views as to whether we agree with the Council's assessment of sites and whether the sites should be preferred, and why.

The site consists of a single arable field, extending to 3.87 hectares. The site is bounded to the west by existing housing, to the south by the highway and beyond residential dwellings and arable land, to the east by the highway and beyond an arable field, and to the north by the village hall and associated playing fields and a field.

The site was put forward as a residential development allocation as part of the Greater Norwich Local Plan (GNLP) Regulation 18 Stage C Regulation 18 Draft Strategy and Site Allocations Consultation. The Supporting Documents accompanying the Village Clusters Housing Allocations Plan include Site Assessment Booklets for each Village Cluster, including Morley and Deopham. These include a completed site assessment form for each site put forward for residential development and outline whether the Council consider the site is reasonable or unreasonable for development. The Site Assessment conclusion states the site is considered an unreasonable option for development.

This representation considers the Assessment of the site within the current Consultation documents and seeks to address the concerns raised and demonstrate that the site should be considered for allocation as part of the South Norfolk Village Clusters Housing Allocations Plan.

This representation is supported by the following documents to demonstrate that the site is suitable for the residential use proposed and should be considered favourably:

- Proposed Site Allocation Masterplan produced by Feilden+Mawson;
- Proposed Schedule of Accommodation Plan produced by Feilden+Mawson;
- Technical note regarding landscape and visual matters produced by The Landscape Partnership;
- Flood Risk Screening and Scoping Exercise produced by Rossi Long Consulting; and
- Transport Note produced by Rossi Long Consulting.

Representation

It is One Planning Consultants and our clients view that Site Reference SN4042 is a suitable site which can accommodate 49 dwellings, including a policy compliant level of affordable dwellings, policy compliant contributions towards open space, green infrastructure and other relevant contributions. The proposal would also provide a new pedestrian footpath to connect to the existing public footpath along Norwich Road to the south and the village hall and playing field to the north on Golf Links Road.

The site is suitable for the proposed residential use, it is available and achievable within the next five years, which makes the site deliverable. The Local Plan covers the timeframe to 2038. Development of the site, which is proposed to provide up to 49 dwellings is expected to commence as soon as possible in 2022/2023 following the granting of planning permission. Our client would propose a scheme of open market and a policy compliant level of affordable dwellings, and the scheme would also provide policy complaint contributions towards open space, green infrastructure and other relevant contributions.

The site is well related to the development boundary, which lies immediately to the west of the site. As highlighted above Morley and Deopham as well as Besthorpe contain a range of services and facilities, which are within walking and cycling distance with a wider range of employment, educational, shopping and other facilities and services to meet the day to day needs of local residents being available within Attleborough and Wymondham, which can be accessed via a regular bus service along Norwich Road, immediately to the south of the site. These considerations weigh in

favour of the application where paragraph 79 of the NPPF states that housing should be located where it will enhance and maintain the vitality of existing rural communities helping to sustain facilities in the surrounding settlements.

Concerns are raised by the Council within the Assessments Booklet for Morley and Deopham stating the *'proposal would expand the village and not reflect the existing grain of development harming the form and character'* and goes on to state that *'the site forms a key gateway into Besthorpe parish from the east. Development of the site would have an adverse impact on both the landscape and the townscape'*.

A proposed site allocation masterplan and schedule of accommodation, produced by Feilden+Mawson is submitted in support of this representation to address the concerns relating to townscape and demonstrate how the site could be developed and accommodate the scale of development proposed whilst providing valuable pedestrian links and associated open space and play space to serve the development and the existing residents. A more detailed analysis referencing this masterplan is set out below. This is supplemented by a Landscape and Visual Technical Note which is also submitted in support to specifically address landscape concerns.

Landscape and Visual Impact

A Landscape and Visual Technical Note produced by The Landscape Partnership is submitted in support of this representation to address the concerns that have been raised and demonstrate that the site can be developed without any significant impact upon the surrounding countryside and landscape.

This highlights how the site is contained within the District-level Landscape Character Area (LCA) 'B2: Tiffey Tributary Valley Farmland'. Some of the key characteristics of this LCA are a gently undulating landscape with limited woodland cover with large scale arable farmlands with villages and isolated dwellings connected via a dense network of rural lanes. It also highlights the presence of important transportation links including the A11, which lies to the south of the site, which make the area an important gateway into South Norfolk.

The Technical Note includes photographs which represent key views from key publicly accessible visual receptors in the vicinity of the site. Following a detailed assessment, the assessment concludes that although this is a relatively flat and open landscape, the site affords a relatively limited zone of theoretical visual influence (ZTVI).

The proposed site is well related to the existing settlement and the proposed layout shown on the supporting Masterplan reflects the existing pattern of development within the surrounding area, with development fronting the two existing road frontages whilst ensuring the development addresses the wider landscape context in a positive manner. Built form would be set back within the site to allow more than sufficient space to provide a landscape buffer and 'soft' edge to the development which would allow for the retention of the existing trees along the site frontage, including the oak trees, which are recognised as important landscape features. The addition of dwellings to the rear of these frontages would represent a natural rounding off and allow for the inclusion of generous open space and pedestrian linkages to the village hall and beyond to the north.

The proposed allocation will facilitate a development that create opportunities to reinforce planting along the site frontages and re-introduce native boundary hedges, which will improve linkages between habitats and green spaces, creating meaningful opportunities for biodiversity enhancements as well as provide a new robust edge to the village and reinforce the landscape character of the area. The aim would be for the new dwellings to be seen within a well-established and enhanced landscaped framework, which would replicate the existing edge of the village to the west of the site, which is of individuals properties set within relatively well landscaped plots.

It is noted within the Site Assessment Booklet that the Council state the proposed access points would involve the removal of existing trees. As the Technical Note states, along with the Transport Note considered below, the proposed access points have been located so that neither the proposed junction nor the associated visibility splays would require the removal of the existing oak trees on the site boundaries. The existing mature hedgerows and vegetation, which are important landscape features, would be incorporated within the development and enhanced where possible, through a comprehensive landscaping scheme, which would help mitigate against any visual impact and would also have biodiversity and habitat creation benefits.

As the Technical Note concludes, the proposed development would have a limited and localised effect on landscape character and would provide opportunities to deliver landscape enhancements at the site as promoted in the South Norfolk Landscape Character Assessment.

Townscape

The site is located adjacent to existing residential development along Hill Road and development along Norwich Road which falls within Besthorpe and would form an extension to this part of Morley village along Norwich Road. The proposed low density of development reflects the existing character and density of surrounding development and is considered appropriate to the size and context of the site. It is clear the Council had concerns with the indicative site plan that accompanied the Regulation 18 GNLP submission previously. The Masterplan submitted in support of this representation has evolved and is considered to address these concerns and demonstrate how the site can be developed to be in keeping with the surrounding character of development and add to the overall quality of the area.

The proposal would include dwellings that front onto Norwich Road and Golf Links Road and therefore would strengthen the linear characteristics and nature of the existing village and would ensure the development reflects the existing pattern of development whilst ensuring the development makes efficient use of the site. From the public perspective, the proposal will follow the existing linear nature of development and provide an active street frontage along Norwich Road, which is a key aim within the revised NPPF which states at paragraph 92 that planning should aim to achieve healthy and safe places with street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods and active street frontages. The proposed Masterplan clearly demonstrates this can be achieved on this site and will also provide valuable linkages between the village and the village hall to the north of the site. Currently the village hall is divorced from the community it serves and the proposal will provide a much-needed pedestrian link that will help to reinforce the sense of community within the locality.

The indicative layout, scale and orientation of the proposed dwellings both in relation to each other and existing neighbouring properties demonstrates that the development of the site would not result in any harm to the amenities or privacy of adjacent dwellings or future occupiers of the development by reasons of overlooking, being overbearing or loss of daylight or sunlight. As highlighted above the proposal would provide vital pedestrian links and the indicative Masterplan provides a layout that encourages walking and cycling to local services and facilities and is considered to create a place that is safe, accessible and promotes health and well-being, with a high standard of amenity for existing and future users, as required by paragraphs 92 and 130 of the NPPF.

It is clear that the proposed allocation is suitable and appropriate in terms of scale and form by complementing, reinforcing and integrating with the existing built surroundings. The allocation of this site in the form presented as part of the proposed allocation, would not appear in any way isolated visually or functionally and represents a logical extension to existing development along Norwich Road.

Housing Type and Tenure

An indicative Masterplan and Schedule of Accommodation is submitted in support of this representation to demonstrate how the site can be developed providing the quantum of development proposed. The indicative plans demonstrate the site could provide the following housing mix:

- 5no. single storey dwellings;
- 6no. 2 bedroom market dwellings;
- 14no. 3 bedroom market dwellings;
- 7no. 4 bedroom market dwellings;
- 1 no. 5 bedroom market dwellings;
- 12no. 2 bedroom affordable dwellings; and
- 4no. 3 bedroom affordable dwellings.

The Strategic Housing Market Assessment (SHMA) 2017 identifies the future need (2015-2036) for market housing and affordable housing of different types for the Norfolk Authorities of Breckland, Broadland, North Norfolk, Norwich and South Norfolk. This highlights how the need within South Norfolk for market housing is for 3 and 4 bedroom houses and for affordable the needs is 2 and 3 bedroom houses. The proposed indicative housing mix seeks to provide both market and affordable dwellings to help meet the required need within the District, which is considered to represent a significant social benefit.

In terms of affordable housing, the site seeks to provide a policy compliant level of affordable housing on-site, via the provision of 16 affordable units and therefore accords with Policy 5 of the emerging GNLP and represents a significant social benefit.

The quantum of development proposed, taking into account the future need and the surrounding character of development, is considered to be acceptable with respect to the surrounding development within the village and its immediate context.

Highways

In terms of vehicular access, a Transport Note has been produced by Rossi Long and has been submitted in support of this representation to address the Highway Authority's concerns and demonstrate that satisfactory access can be achieved to serve the development.

Within the Site Assessment Booklet, the Highways Authority comments give the site score 'amber' for access to the site and they state '*Subject to suitable access, requiring tree removal and 2.0m frontage footway. No safe walking route to school*'.

It is stated within the Site Assessment conclusion that '*achieving a suitable access and footway would require tree removal*'. As highlighted above, the proposed access points have been located so that neither the proposed junction nor the associated visibility splays would require the removal of the existing oak trees on the site boundaries and therefore this is not considered a constraint to the development of the site.

In terms of vehicular access, private accesses are proposed from both Norwich Road and Golf Links Road for the frontage dwellings, as requested by Norfolk County Council Highways, which will serve to assist with speed attenuation in the area. The remainder of the properties will be accessed via a Priority T-junction with appropriate turning head facilities provided within the site. Visibility splays of at least 2.4m x 90m will be provided from the site entrance, which accord with the requirements of the DMRB (Design Manual for Roads and Bridges) for the 30mph speed limit on Norwich Road at this point. Also, as part of the development much needed junction improvements to the junction of Golf Links Road and Norwich Road would be proposed. This would provide a significant benefit to this important junction that is currently operating over capacity and causes delays on the highway network in the area at peak times.

In terms of pedestrian access, footway facilities will be provided from within the site to the access junction providing a safe and direct access across the site. Further, a 2.0m wide improved footway will be provided along Norwich Road to connect with existing facilities to the west as well as a new 2.0m wide footway along the site frontage on Golf Links Road northwards from the junction with Norwich Road. These facilities will provide a safe, convenient connection for new and existing residents.

Additionally, a footway link will be provided from within the site to connect with Morley Village and Sports Hall located on the site's northern boundary. There is currently no safe pedestrian route connecting the village hall to the village and its residents and the proposed footpath would provide an invaluable link to this well used community facility that would otherwise be undeliverable. Our client would also be happy to assist in the provision of further pedestrian linkages or support the provision access to Wymondham College and the recently approved primary school beyond the site boundary and this could be explored as part of any detailed application. The proposal would therefore provide a safe and continuous footpath connection between the application site and available services and facilities within Besthorpe to the south and also to the village hall to the north, which is considered to represent a significant economic and social benefit, which should be given significant weight.

In terms of public transport, bus stop services are available on Norwich Road adjacent to the site (i.e. within 400m walking distance from anywhere within the site) providing a regular, fast connection to and from places such as Attleborough to the south and Wymondham and Norwich to the north. The Conclusion of the Technical Notice is that the site is located adjacent to an existing residential area which will enable trips to be made by more sustainable modes of travel, such as walking, cycling and public transport.

Car parking spaces, including visitor parking space, would be allocated appropriately across the site as shown on the accompanying Masterplan according to dwelling size and would accord with Norfolk County Council's residential parking guide. Timber sheds will be also provided within the residential curtilages to enable secure cycle storage and to encourage residents to cycle rather than take the car.

The Technical Note concludes that there are no safety or capacity reasons why the site should not be allocated for the development proposed.

Flood Risk

In terms of flood risk, a Flood Risk Screening and Scoping Exercise has been undertaken by Rossi Long and has been submitted in support of this representation to address the Lead Local Flood Authority's (LLFA) concerns and demonstrate that the site can be developed in a satisfactory way.

Within the Site Assessment Booklet for Morley and Deopham it is noted the site score for flood risk is 'red' and the LLFA state there is *'Severe constraints make this unfavourable for development, recommend a review and potential removal of site. The site is located in an area of internal and external flood events, the west/north west is affected by significant flooding'*.

The site is located within Flood Zone 1 (fluvial) with a 'very low' to 'high' risk of flooding from surface water flooding along the northern boundary of the site. The Report concludes that the NPPF Sequential and Exception Test are not required and that the areas of 'low' to 'high' risk of surface water flooding should be left free from development to ensure the properties are not at risk of flooding and the development does not increase the risk of flooding elsewhere. The accompanying Masterplan provides an indicative layout of how the development could be accommodated on the site and this demonstrates that the site can accommodate the level of development proposed whilst keeping the areas of 'low' to 'high' risk of surface water flooding to the north of the site free from residential development. The northern boundary is proposed to form a landscaped area with a meadow, pedestrian links, pumping station and a play area.

The Masterplan provided is indicative and any detailed proposal would include a Flood Risk Assessment and Drainage Strategy to ensure the proposal fully addresses the flood risk issues on site and provides an improvement over the current situation by reducing flood risk through the management of run off and on-site water storage. It is considered the Masterplan demonstrates how the site can be developed in a way which responds positively to all the site constraints and is in keeping with the surrounding density of development whilst not relying on land at risk of flooding. It is therefore considered that the site can be developed whilst addressing the flood risk issue on site.

In relation to utilities capacity, as highlighted within the Site Submission Form, there are no known connection issues which would prevent the development of the site coming forward.

The site represents a suitable site for the development proposed and should be considered favourably as part of the ongoing assessment of sites for housing. The proposal represents organic growth of the village and would provide open market and affordable dwellings for members of the local community. The proposal would also provide significant economic and social benefits in the form of additional open space and a new pedestrian access providing safe pedestrian access for existing and future residents to the village hall and playing fields to the north of the site, which should be given significant weight. The allocation of the site within the South Norfolk Village Clusters Housing Allocations Plan would make a significant contribution towards meeting the required housing need of the village cluster and the District.

Deliverable and Developable

The NPPF advises that housing applications should be considered in the context of the presumption in favour of sustainable development and sites must be both deliverable and developable. The proposed development is both deliverable and developable for the following reasons:

Deliverable

According to NPPF guidance to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Our client has an option agreement on the site and the site is available now. There are no financial or environmental reasons why the proposed development cannot be delivered within the immediate future following the granting of planning permission.

Developable

According to NPPF guidance to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. As set out above, the site is adjacent to existing residential development and is immediately adjacent to the existing development boundary for Morley St Peter. The site is therefore considered to be a suitable location for new housing and its development for housing would bring significant planning benefits to the District. There are no known reasons to prevent a viable development from coming forward at the site as proposed.

Summary

As set out above the land to the north of Norwich Road provides a suitable site of residential development within Morley, which is deliverable and developable and relates well to existing development, with the site lying immediately adjacent to the defined development boundary to the west, as well as services and facilities within the surrounding area. The site would provide 49 dwellings which would go a significant way in ensuring the housing need in Morley and Deopham is met.

It is considered the site is suitable for the residential use proposed and should be considered favourably as part of the ongoing assessment and consideration of housing allocations within the village cluster of Morley and Deopham.

Golf Links Road, Morley



Golf Links Road, Morley





Schedule of Accommodation

Private Market

Colour Code	Type	Area	Quantity
	Bungalow	82m ²	1
	Bungalow	90m ²	2
	Bungalow	115m ²	2
	2 Bed House	99m ²	6
	3 Bed House	101m ²	14
	4 Bed House	159m ²	7
	5 Bed House	242m ²	1
			26

Affordable

Colour Code	Type	Area	Quantity
	2 Bed House	99m ²	12
	3 Bed House	101m ²	4
			16

33% affordable homes provided to comply with policy 5 of GNLP

Total no. of dwellings = 49

