

## Village Clusters Housing Allocations Plan – Regulation 18 Draft: Consultation Response

<b>Project:</b>	Land South of Station Road, Spooner Row	<b>Reference:</b>	SN0567 & SN2082 (Part)
<b>Client:</b>	Mr T.A. Cullum	<b>Date:</b>	July 2021

### 1.0 Introduction

- 1.1 On behalf of our client and the landowner, Mr T.A. Cullum, we wish to support the site south of Station Road, Spooner Row, for allocation for residential development. Our client considers that the site is deliverable and would make a valuable contribution to the housing land supply requirements within the Plan period.
- 1.2 This representation is submitted as part of the Village Clusters Housing Allocations Plan Regulation 18 Consultation specifically in support of the sites referenced as SN0567 for “Land south of Station Road and west of Queensland, Spooner Row” and Part of SN2082 for “Land south of Station Road and east of Top Common”. The site referred to under reference SN2082 was promoted as a larger site directly to the south of site SN0567, however, only part of SN2082 has been considered as preferred for development in the Regulation 18 Draft Plan. This representation focuses only on the combined land that has been identified as preferred.
- 1.3 Our client agrees entirely with the principle of the combined site being identified as preferred for allocation for 25 dwellings and wishes to provide further support and clarity in response to this consultation.
- 1.4 This representation aims to provide additional detail relating to the site opportunities and responds to the relevant Site Assessment Booklet that forms the Supporting Documents package of the Regulation 18 Draft Plan.

### 2.0 Site Opportunities

- 2.1 The combined site was promoted originally for residential development only.
- 2.2 The site is located in a sustainable location, on the edge of a village with excellent accessibility to rural services and facilities, as well as public transportation links. The site itself is directly opposite the Primary School, 100 metres to the village hall, 150 metres from the railway station and 450 metres to the local pub.
- 2.3 As part of the Regulation 18 Draft Plan, the combined site is referred to as being preferred for 25 dwellings on a site of approximately 1 hectare on the area of land highlighted in brown on the plan in Figure 1 below. However, the area of land identified by the brown hatch in the corresponding preferred sites plan actually measures approximately 1.6 hectares as opposed to 1 hectare. This comprises the entirety of site SN0567 equating to 0.79 hectares, in addition to approximately 0.81 hectares of site northernmost section of SN2082.

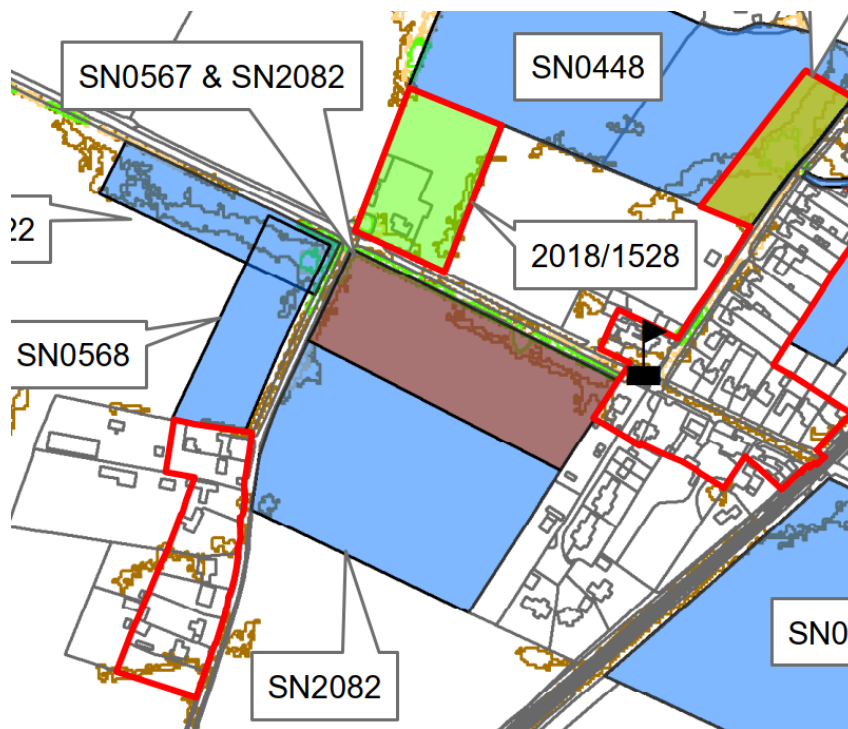


Figure 1: Site Location

- 2.4 Following discussions with the Local Plan Team, it is understood that this is likely to be a typo and the preferred site allocation should have read 1.6 hectares. It is considered that the 1.6 hectare area outlined in brown in the Regulation 18 Draft Plan is the minimum required to achieve 25 dwellings on this particular site. This would equate to density of approximately 16 dwellings per hectare, which is considered an appropriate density for the location and necessary in respect of the site conditions. A lower density is also considered to provide opportunity for a higher quality and well-designed scheme to be delivered.
- 2.5 The landowner has received advice from a property consultant on the type of development that would be desirable and most viable in this location based on current market experience and indicators. Based on this information, the landowner considers the site to be viable to deliver a mix of 2, 3, 4 and 5 bedroomed dwellings, with a focus on the delivery of a higher proportion of spacious family homes that respond to the recently increased need for additional internal space and larger gardens for private amenity space.
- 2.6 The combined site is capable of achieving a mix that would be broadly in line with the current Strategic Housing Market Assessment (2017) which identifies the need in South Norfolk for predominantly 3 bedroomed properties, with more four bedroomed properties needed than two bedroomed properties generally. We understand that an updated Strategic Housing Market Assessment for the Greater Norwich Area is currently being prepared. Once published, our client would review in accordance with any updated evidence and discuss any new or amended requirements arising with the Local Planning Authority.

- 2.7 Our client expects to deliver eight of the 25 dwellings as affordable homes, which would be in accordance with the 33% requirement (rounded to the nearest dwelling) set out in both the adopted and emerging Development Plans. The exact tenure and housing mix would be subject to agreement with the Housing Enabling Officer, however, three dwellings as a minimum would be provided under the affordable home ownership tenure in accordance with the requirement set out in Paragraph 65 of the National Planning Policy Framework (2021).
  
- 2.8 Whilst a proposed site layout is still subject to detailed consideration, an indicative masterplan accompanies this representation which identifies how a potential mix of 25 dwellings could be delivered on the site of 1.6 hectares.
  
- 2.9 There are no absolute constraints on the site (such as protected ecological sites, heritage assets or high flood risk areas) which would render this site undevelopable or would impact how the site is delivered. Furthermore, the area of land promoted under reference SN0567 has previously achieved outline planning permission for eight dwellings, which demonstrates that there should be no insurmountable physical or material planning constraints that would prevent development.
  
- 2.10 The reasoned justification set out in the Regulation 18 Draft Plan recognises that the site has a good relationship with the existing settlement and a linear form of development along the frontage of the site would complement the existing pattern of development. The landowner agrees with this design approach and the principle of frontage development was also established in the recently lapsed outline planning permission on the site. However, to achieve the plot depths required by frontage development along a site of this length, it does result in an overall deeper site than what may otherwise be required.
  
- 2.11 The indicative masterplan that accompanies this representation demonstrates how development could be achieved along the site frontage, incorporating a new footpath along this stretch of Station Road and setting the frontage dwellings back behind private drives that run parallel to Station Road in order to reduce the number of individual access points taken from Station Road. This design principle is in accordance with the indicative layout presented in the approved outline planning application on the site. The access from Station Road would continue to the rear of these frontage dwellings and further dwellings would sit behind this frontage row with a variety of orientations in order to avoid overlooking.
  
- 2.12 A slight set back from Station Road would soften the frontage and would provide opportunities to address the minor landscape impact of the development through an appropriate landscaping scheme. Subject to detailed design, this could allow some soft landscaping along the frontage and could allow some reprovision of the current features that may need to be lost in the creation of the new access points and appropriate visibility splays.
  
- 2.13 In respect of the access within the site, at least one adoptable standard access road will be required to facilitate a development of this scale. In accordance with emerging guidance from Norfolk County Council, the site could be developed with no more than nine dwellings being accessed off any single private drive. It is also considered that there is the potential for two adoptable accesses from Station

Road, subject to detailed discussions with Norfolk County Council Highways, in order to provide a better layout to the rear of the frontage row of dwellings.

- 2.14 It is recognised that footway improvements are required to link the site to the Primary School and existing footway to the east, which the indicative masterplan submitted with this representation demonstrates is achievable. Delivery of this site would facilitate these offsite improvements for the benefit of the wider community.

### **3.0 Site Assessment**

- 3.1 In order to inform the Regulation 18 Supporting Documents, the combined site has been subject to two Suitability Assessments under the site references SN0567 and SN2082. The suitability of each site against various constraints was assessed in accordance with the assessment criteria set out in the 'Norfolk Housing and Economic Land Availability Assessment (July 2016)' methodology and assigned a HELAA Score which corresponds with a traffic light system of Red/Amber/Green. A further Site Score, which also uses a traffic light system, has been assigned where new information has been provided or new constraints have been considered.

- 3.2 As part of the suitability assessment, both sites received a 'Green' score against both the HELAA Score and Site Score criteria in respect of the following matters:

- Accessibility to local services and facilities (Part 2)
- Utilities infrastructure
- Better Broadband for Norfolk
- Identified ORSTED cable route
- Contamination and ground stability
- Townscape
- Biodiversity & geodiversity
- Open space
- Neighbouring land uses

- 3.3 Accordingly, the above matters are not considered further as part of this submission.

- 3.4 A further seven matters were considered 'Amber' in either the HELAA Score, Site Score or both in respect of both SN0567 and SN2082. These matters are assessed individually in further detail below.

#### **Access to the site**

- 3.5 A new access would need to be created from Station Road through development of this scheme. Station Road is an adopted highway located immediately adjacent to the site and there are no known reasons that would render access unachievable. NCC Highways confirmed in their meeting of 27<sup>th</sup> January 2021 to assess the site for this Regulation 18 Draft that the site provides a potentially good option for development.

- 3.6 Indeed, the principle of new access from Station Road has already been established through the previously consented planning permission on the site. Possible design options for the access were also discussed at length with the Highway Authority during the determination period. It was acknowledged by the Highway Authority that they had no objections to the principle of housing on this site, and they considered that provision of a single point of access (in respect of eight dwellings) is favoured over the provision of single access points to each dwelling. The indicative masterplan submitted with this representation demonstrates how the scheme of 25 dwellings could be delivered with fewer access points from Station Road. Two access points are shown at present, but this would be subject to detailed discussion with the Highway Authority.
- 3.7 The indicative masterplan also demonstrates the footway improvements, comprising as a minimum a new 2 metre wide frontage footway, which NCC Highways have indicated would be required to link the site to the village school and the existing footway to the east of the site. Delivery of this site would facilitate these offsite improvements for the benefit of the wider community.
- 3.8 Whilst subject to detailed design, it is likely that some hedgerow and tree removal along the site frontage will be required to facilitate access and acceptable visibility splays. However, the landscape and arboricultural impact of this could be mitigated by a replacement landscaping scheme where appropriate.
- 3.9 Based on the foregoing, access to the site is by all means possible and achievable, and any existing site constraints have the ability to be appropriately mitigated.

#### Accessibility to local services and facilities (Part 1)

- 3.10 Whilst it is acknowledged that the sites scored 'Amber' based on the original HELAA Methodology, when the Site Score methodology was expanded to include additional facilities such as village halls and pubs, the sites scored 'Green'. The site itself is directly opposite the Primary School, 100 metres to the village hall, 150 metres from the railway station and 450 metres to the local pub.
- 3.11 Overall, the site is considered to be in a sustainable location with access to more services than would usually be available for a village of this scale. Furthermore, the development of the site would facilitate the provision of a new footpath along the site frontage, which would improve access for future residents to the existing local services and facilities.

#### Utilities Capacity

- 3.12 The suitability assessment that accompanies the Regulation 18 Draft indicates that local wastewater capacity is still to be confirmed. However, the work carried out during planning applications for residential development on the site referred to as SN0567 confirmed that there was sufficient capacity on the existing Anglian Water foul sewer. The landowner has no reason to believe that this situation has changed. Accordingly, capacity issues should not be seen as reason to prevent development on this combined site.

### Flood Risk

- 3.13 The site is located within Flood Zone 1 and therefore is considered to be at a low risk of flooding. Furthermore, no sequential test would be required to facilitate development of this site.
- 3.14 In terms of the risk from surface water flooding, there are ditches running along the northern site boundary with Station Road and the western boundary with Top Common, which have been identified as areas at risk of surface water flooding.
- 3.15 Through the previously planning applications on the SN0567 site, a site specific flood risk assessment has previously been prepared and approved through the earlier planning permission. The approved flood risk assessment confirmed that the risk of potential surface water flooding can be managed through setting the scheme back slightly from Station Road, which would negate the need for any changes to the existing ditch and lead to a low risk provision. There is sufficient space available on the site to achieve this, providing the allocated site area is 1.6 hectares as a minimum. The approved drainage strategy also demonstrated how access to the site can be achieved whilst managing this area of surface water flood risk.
- 3.16 Whilst future development would be subject to its own detailed drainage strategy, the same principles as already approved for managing flood risk and achieving an appropriate strategy for discharging surface water could be applied to a scheme of 25 dwellings. Indeed, the indicative masterplan demonstrates how this could be achieved along the same principles as the previously approved scheme. Accordingly, there is no evidence to suggest that flood risk would constrain or limit development in this location.

### Landscape Assessment

- 3.17 The site was assessed as 'Green' under the HELAA Methodology and it was acknowledged that development would relate to the existing settlement in landscape terms.
- 3.18 The site is located immediately adjacent to the built-up settlement and, in our view, provides a logical extension to the village. The village is characterised by linear development along straight roads, which this development has the ability to achieve with some additional units set behind the row of frontage dwellings. The form of development would therefore be in keeping with the existing character of the locality.
- 3.19 The Landscape Officer has since commented on the suitability assessment that a larger allocation would result in a loss of hedgerow frontage and potentially trees, which would lead to a possible conflict with local character. However, the design principles anticipated by this development, as demonstrated in the indicative masterplan, could be similar to those previously approved in the planning permission for eight dwellings on the site. The addition of further dwellings set behind the frontage row would not significantly impact how access is achieved into the site and therefore is not necessarily the instigator for the loss of hedgerow and trees. Indeed, the previously approved indicative site layout plan did assume that the majority of the existing hedgerow would be removed.

- 3.20 The development of the site for 25 dwellings is considered to provide opportunities to address the minor landscape impact of the development through an appropriate landscaping scheme. Subject to detailed design, this could allow some soft landscaping along the frontage and could allow some re-provision of the current features that may need to be lost in the creation of the new access points and appropriate visibility splays.
- 3.21 It has been further established from the suitability assessment site visit that development of this site could be accommodated without resulting in significant harm to the landscape or form and character of the settlement.
- 3.22 Based on the foregoing, a detailed design could be achieved that would limit landscape character harm. Furthermore, there are ample opportunities for landscape mitigation.

#### Historic Environment

- 3.23 The site is not within close proximity to any Listed Buildings, Registered Parks and Gardens, Scheduled Ancient Monuments or Conservation Areas.
- 3.24 Under the HELAA Methodology, the site was scored 'Amber' as it was speculated whether the school to the north of the site could be considered a non-designated heritage asset. However, the Senior Heritage and Design Officer has since commented that no issues are anticipated in regard to heritage impact and the Site Score is currently considered 'Green'. Furthermore, the impact on heritage assets was considered in the previously approved planning application and no concerns were raised in this regard, nor was the school considered to be a non-designated heritage asset.
- 3.25 Accordingly, there is no reason to consider that development of the site would have a detrimental impact on any designated or non-designated heritage asset.

#### Transport and Roads

- 3.26 As demonstrated under the sub-heading 'Access to the site' above, the considerations of this representation and the indicative masterplan have considered the response from NCC Highways in relation to achieving an appropriate and safe access from Station Road, as well as securing proportional offsite highway improvements. Based on this previously explained justification, the development of this site for 25 dwellings will not have a detrimental impact on the functioning of the existing local road network and provides opportunity for the network to be improved through the provision of a new footpath.

### 4.0 Deliverability

- 4.1 The definition of a site being 'deliverable', for the purposes of sites for housing, is set out in Annex 2 of the National Planning Policy Framework (2021). In order to meet the standard being considered



deliverable, sites should be suitable, available and achievable. The site is assessed against these three tests below.

### Suitable

- 4.2 As concluded in the Site Assessment, in accordance with the HELAA Methodology and the updated Site Score Methodology, the site is considered suitable for the proposed development. The suitability is further justified by the assessment carried out in Section 3.0 above.

### Available

- 4.3 The site outlined is entirely owned by Mr T.A. Cullum and is registered under a single Title for SN0567 and a single Title for SN2082. There are no known legal constraints in respect of either Title that would restrict future development for these purposes.
- 4.4 The landowner supports this representation to make the land available for the stipulated development within the Plan period, but considers that housing could realistically be delivered early in the Plan period and within five years.

### Achievable

- 4.5 In order to be achievable, there must be a realistic prospect that development will be delivered on the site. As established above, there are no known physical, legal or planning constraints that would prevent development of this site.
- 4.6 It is recognised that footway improvements are likely to be required to make the development achievable. The landowner supports these requirements and the indicative masterplan demonstrates how this can be achieved on site. This would become a public benefit.
- 4.7 Through initial discussions with the Housing Enabling Officer, it is acknowledged that there would be a need to provide eight affordable dwellings as part of the development of the site. The landowner acknowledges this requirement and based on the site investigations conducted to date, considers it achievable in respect of viability.
- 4.8 The landowner has a clear desire, as evidenced through the previous planning history, preparing this representation, undertaking initial site assessments and presenting a feasible masterplan, to ensure that the site potential envisioned by this Regulation 18 Draft is achieved.

## 5.0 Conclusion

- 5.1 The site is well related to the existing settlement, providing a logical and sustainable extension to the village. The indicative Masterplan demonstrates how the site could be development harmoniously to create an attractive and suitable housing development site for the village.



- 5.2 There are no material planning considerations that would restrict the development of this combined site for the proposed use and this is demonstrated through the Site Assessment contained in Section 3.0 of this representation.
- 5.3 In conclusion, the site is suitable, available and achievable, both within the Plan period and indeed within the next five years. Accordingly, the standard tests of deliverability as set out in the NPPF are met and the site should continue to remain preferred for allocation within the South Norfolk Village Clusters Housing Allocations Plan for 25 dwellings on a site area of approximately 1.6 hectares.