

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

Project:	Land South of Station Road and East of Top Common, Spooner Row	Reference:	SN2082 (Part)
Client:	Mr T.A. Cullum	Date:	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 and east of Top Common, Spooner Row, for allocation for additional 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 Draft Consultation in support of part of the site referenced as 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. A separate representation has been submitted for the combined site that has been identified as preferred, whereas this representation focuses only on the remaining land of SN2082 that has currently been discounted.
- 1.3 This representation aims to provide further 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 site was originally promoted as a 2.89 hectare site for residential development.
- 2.2 An area of approximately 0.81 hectares of the northernmost section of SN2082 has been identified as a preferred site combined with SN0567 for the development of a total of 25 dwellings. This leaves a remaining parcel of land measuring approximately 2.08 hectares of SN2082 that would be located immediately to the south of the preferred development site.
- 2.3 This remaining parcel of land is highlighted in blue immediately to the south of the preferred site (hatched in brown) in Figure 1 below.
- 2.4 This parcel of land remains available for further development either in full or across part of the site.

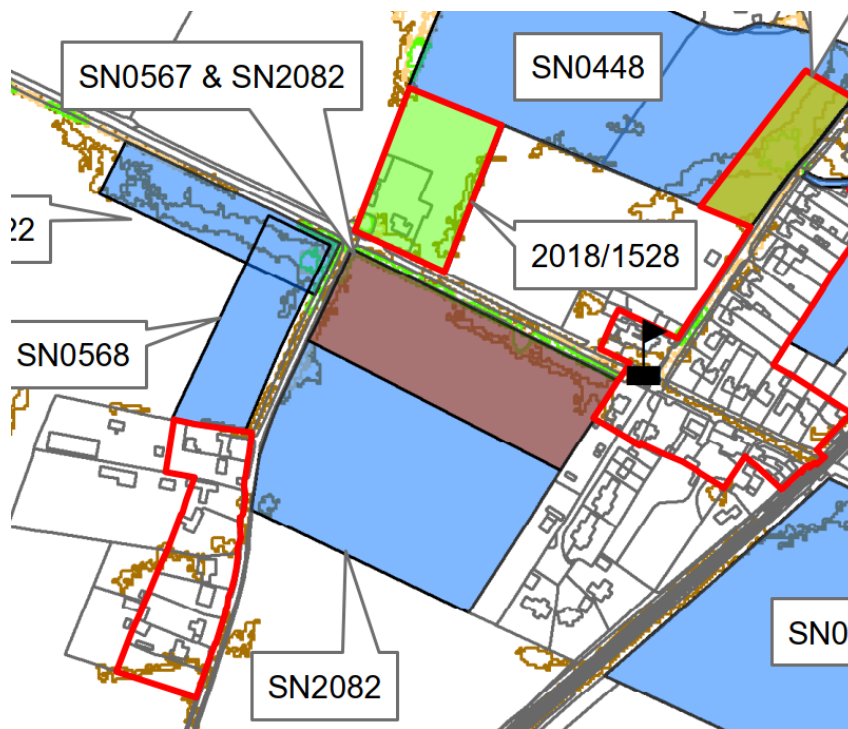


Figure 1: Site Location

- 2.5 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. Taken from the boundary of the preferred site, this site is approximately 100 metres from the Primary School, 160 metres to the village hall, 230 metres from the railway station and 530 metres to the local pub. New footpath connections, facilitated through the preferred site, could connect dwellings to the south to Station Road and onto the new footpath along the highway into the village safely.
- 2.6 The preferred site would also have to deliver a new adoptable standard access road to serve the proposed 25 dwellings in the allocation. Accordingly, the infrastructure to serve additional development behind the preferred site would already be delivered through the preferred site, avoiding any requirement for additional access to be taken from the existing highway and thereby minimising the impact the local road network.
- 2.7 Development of this additional parcel of land is considered to be a further logical extension to the village. The existing development to the east of the site extends as far south as the field boundary to this site and therefore development to these extents would be consistent with the neighbouring pattern of development.
- 2.8 As with the site that has been identified as preferred, there are no absolute on-site constraints (such as protected ecological sites, heritage assets or high flood risk areas) with the remaining land of SN2082 which would render this site undevelopable or would impact how the site is delivered. Indeed, the identification of the combined site to the north as a preferred site for development, along

with the planning history on the site to the north, demonstrates that this site is technically capable of being developed for residential development.

- 2.9 Based on the remaining area of 2.08 hectares of land, the site has the ability to deliver up to 52 additional dwellings on a density of 25 dwellings per hectare, or up to up to 35 additional dwellings based on a density of 16 dwellings per hectare in line with the likely density for the preferred site.
- 2.10 Whilst it is acknowledged that the Village Clusters Plan intention is for smaller scale allocations, with most being between 12 and 35 dwellings, this site has clear capacity to allow a sustainable extension to the identified preferred site. The preferred site could be amended to draw in additional land from this remaining site. Alternatively, additional dwellings could be secured as a second allocation for up to 35 dwellings, which would remain in accordance with the intentions of the Village Clusters Plan.
- 2.11 Spooner Row has been identified through the Regulation 18 Draft as a village that is capable of supporting growth. In addition to the preferred site to the north for 25 dwellings, a further site capable of delivering up to 15 dwellings has also been identified as preferred in the Regulation 18 Draft. Taken together, the current expectation of up to 40 new dwellings across the Plan period recognises the ability of the village to support an appropriate scale of development.
- 2.12 The available services and facilities in the village are ranked highly in the site suitability assessments that form the supporting documents to this Regulation 18 Draft. This demonstrates that Spooner Row has the existing local services provision to facilitate development and provides a unique opportunity for additional growth.
- 2.13 In our view, the village does have a range of services that aren't available in villages elsewhere in the District, as well as being directly accessible to the nearby Wymondham and Attleborough where a further range of services and facilities can be found. The village therefore provides an opportunity to expand upon the 40 dwellings already identified to compensate for there being no suitable sites identified in other nearby settlements.

3.0 Site Assessment

- 3.1 In order to inform the Regulation 18 Supporting Documents, the site has been subject to a Suitability Assessment under site reference SN2082. The suitability of the entire 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, the site 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 SN2082 as a whole. These matters are assessed individually in further detail below.

Access to the site

3.5 The site is immediately adjacent to a site that has been identified as a preferred site for development. The preferred site is adjacent to Station Road and at least one new access would need to be created from the public highway through the development of the preferred site. Furthermore, due to the scale of the preferred site, this new access will have to incorporate a new adoptable standard road.

3.6 Accordingly, the new access infrastructure to serve any additional dwellings would be facilitated through preferred site. Through the suitability assessment, NCC Highways have also recognised that this site is a potentially good option for development and confirmed that development of all or part of this site would be subject to obtaining access through SN0567 onto Station Road. There would be no anticipated reason to create any further or new accesses from Station Road or Top Common.

3.7 In terms of the capacity of the existing network, NCC Highways have not identified any capacity issues with the existing highway that would limit the ability of more than 25 dwellings to be served from a new access road from Station Road.

3.8 Based on the foregoing, access to the site is by all means possible and achievable, and any existing site constraints relating to access will have already been appropriately mitigated through the preferred site.

Accessibility to local services and facilities (Part 1)

3.9 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'.

3.10 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. Taken from the boundary of the

preferred site, this site is approximately 100 metres from the Primary School, 160 metres to the village hall, 230 metres from the railway station and 530 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 new footpaths through the site which would connect to the preferred site to the north and the new footpath along the site frontage required through that allocation, which together would improve access for future residents to the existing local services and facilities in the village.

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 to the north 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 or that additional dwellings would not benefit from the currently available capacity.
- 3.13 Should any capacity issues arise at a later date, an increased site allocation has the potential to improve viability of the overall scheme and may in turn offer opportunities to provide additional infrastructure to contribute towards enhancing utilities capacity if required.
- 3.14 Based on the foregoing, capacity issues should not be seen as reason to prevent additional development on this site.

Flood Risk

- 3.15 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.
- 3.16 In terms of the risk from surface water flooding, there are some small, isolated areas running along the western boundary with Top Common which have been identified as areas at risk of surface water flooding. The available site area provides the opportunity to avoid these areas of surface water flooding risk. Accordingly, development could be accommodated on the site without any conflict in respect of flood risk.
- 3.17 Matters in respect of flood risk for the preferred site to the north are outlined in the separate representation submitted for that site and conclude that due to the flood risk assessment work previously carried out for the site, an acceptable drainage strategy can be devised comprising principles already approved through previous planning permissions. Accordingly, there is no evidence to suggest that flood risk would constrain or limit development for the preferred site, or for any additional dwellings beyond.

Landscape Assessment

- 3.18 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.
- 3.19 Any additional development would only come forward either with or after the development of 25 dwellings envisioned by the preferred site. At that stage it would be immediately adjacent to the built-up settlement and would provide a further logical extension to the village with a form of development that could remain in keeping with the local character. The existing development to the east of the site extends as far south as the field boundary to this site and therefore development to these extents would be consistent with the neighbouring pattern of development.
- 3.20 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 preferred site would deal with the impact of loss of existing hedgerow along Station Road and this is considered in full in the representation submitted in support of the preferred site. Furthermore, the design principles along the frontage associated with the preferred site could be similar to those previously approved in the planning permission for eight dwellings.
- 3.21 The addition of any further dwellings set behind the frontage row would not significantly impact how access is achieved into the site and therefore is not a factor in the loss of any further hedgerow and trees. There is no requirement or expectation for an access from Top Common and therefore the existing hedgerow along the western boundary of this remaining site can be retained.
- 3.22 Indeed, the development of this parcel of land for additional dwellings may provide opportunities to improve the potential landscaping scheme associated with the delivery of the site as a whole.
- 3.23 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

- 3.24 The site is not within close proximity to any Listed Buildings, Registered Parks and Gardens, Scheduled Ancient Monuments or Conservation Areas.
- 3.25 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, in relation to the preferred site to the north, the Senior Heritage and Design Officer has since commented that no issues are anticipated in regard to heritage impact from that site. This remaining parcel of land is no closer to any designated or non-designated heritage assets than the preferred site. There would therefore be no additional heritage impact than that already assessed in consideration of the preferred site.

- 3.26 Furthermore, the impact on heritage assets was considered in the previously approved planning application to the north of the site and no concerns were raised in this regard, nor was the school considered to be a non-designated heritage asset.
- 3.27 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

- 3.28 As demonstrated under the sub-heading 'Access to the site' above, this representation has 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 through the delivery of the preferred site to the north. Based on this previously explained justification, the development of this site for additional dwellings is not expected to have a detrimental impact on the functioning of the existing local road network.

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, in principle, 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. Mr T.A. Cullum also owns the land identified in the preferred site to the north. 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.
- 4.4 There are no known legal constraints in respect of the land that would restrict future development for these purposes.

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 The site would be achievable through the development of the land to the north, which has already been identified as a preferred site and is held in the same ownership as the landowner.
- 4.7 It is recognised that footway improvements are likely to be required to make the development achievable. These requirements would be delivered through the preferred site to the north, reducing the infrastructure requirements for any further development on this site to the south.
- 4.8 It is acknowledged that any further development would be expected to provide affordable housing equating to 33% of the total number of dwellings, including 10% of the total number of dwellings being delivered for affordable home ownership units. The landowner recognises this requirement and based on the site investigations conducted to date, considers it achievable in respect of viability.
- 4.9 The landowner has a clear desire, as evidenced through the previous planning history and in preparing this representation, to ensure that the full site potential envisioned is achieved in line with the aims and objections of the Village Clusters Plan.

5.0 Conclusion

- 5.1 The site is well related to the existing settlement, providing a logical and sustainable extension to the village and the already identified preferred site to the north. The site could be developed harmoniously as an extension to the preferred site 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 has significant potential for allocation within the South Norfolk Village Clusters Housing Allocations Plan for up to 35 additional dwellings on the remaining 2.08 hectares of land in addition to the site already identified as preferred.