

SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS PLAN

REGULATION 18 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

On behalf of J Alston and Sons Ltd, we write in response to the consultation on the South Norfolk Village Clusters Housing Allocations Plan (hereafter referred to as 'Village Clusters Plan') under regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. We wish to object to the site allocation at Land West of Bunwell Road, Spooner Row (SN0444) and propose as an alternative site allocation Land at Chapel Road, Spooner Row (SN0404).

The Village Clusters Plan is being developed alongside the emerging Greater Norwich Local Plan (GNLP) in accordance with Government's national planning policies and guidance. To meet the remaining requirements of the emerging GNLP, the Village Clusters Plan needs to identify sites for at least a further 1,200 new homes. The Village Clusters Plan seeks to allocate a series of smaller sites, typically within the range of 12 to 50 homes, across the 48 Village Clusters in South Norfolk. One of the Village Clusters identified is Spooner Row.

The Village Clusters Plan for Spooner Row identifies two Preferred Allocation Sites:

- i. Land South of Station Road and west of Queensland, Spooner Row (SN0567) and (part) Land south of Station Road and east of Top Common (SN3082)
- ii. Land West of Bunwell Road, Spooner Row (SN0444)

SN0567 and SN3082 - Land south of Station Road and west of Queensland, Spooner Row and (part) Land south of Station Road and east of Top Common

Site SN0567 and SN2082 is identified as a Preferred Allocation Site for 25 dwellings on a site of approximately 1 hectare in the Village Clusters Plan. The Site SN0567 lies adjacent to Station Road at the front of the site and has previously had the benefit of outline planning permission for eight dwellings including two affordable units (ref: 2017/1321), which was granted on the 22 February 2018. Condition 1 required that the application for the approval of reserved matters must be made before the expiration of one year from the date of the permission. The consent has therefore lapsed.

Following this, a hybrid application (ref: 2018/2071) was submitted on the 18 September 2018 for the following:

"Outline application for 5 houses on Land West Of Queensland. Full application for 3 houses on Land West of Queensland and 2 affordable houses on Land Adjacent to 2 Cantley Villas."

An extension of time has been granted for the application and the officer has advised that *"if the site is to become a preferred site, then at some point in the process of moving towards the adoption of the GNLP this will accrue sufficient weight to be decisive in a decision-making development management context."*

Given that planning permission was granted for the (ref: 2017/1321), the principle of residential development in this location has previously been considered acceptable and, accordingly we do not wish to comment further on this allocation.

SN0444 - Land West of Bunwell Road, Spooner Row

In terms of the Land West of Bunwell Road, Spooner Row (SN0444), the site is identified as a Preferred Allocation Site for up to 15 dwellings on a site of 0.7 hectares. We have reviewed this site (SN0444) and object to the allocation for the reasons set out below.

Objective 3 of the Village Clusters Plan seeks to protect the character of villages and their settings and requires proposals to:

“Ensure that the scale, location and density of housing is well related to the form and character of existing villages and ensure appropriate landscaping measures are delivered as part of new development”

The Village Clusters Plan notes that Spooner Row village has developed as four significant settlement groupings. The main settlement grouping is to the south, and is a distinctive fork shape, with linear development alongside Bunwell Road and Queen Street. Figure 1 shows the preferred site allocation (SN0444) location in brown. The remainder of the site (SN0444) is identified in blue and is considered unsuitable for development, due to the site being too large to meet the objective of the Village Clusters Plan and to avoid the identified areas of flood zones 2 and 3a within the site.

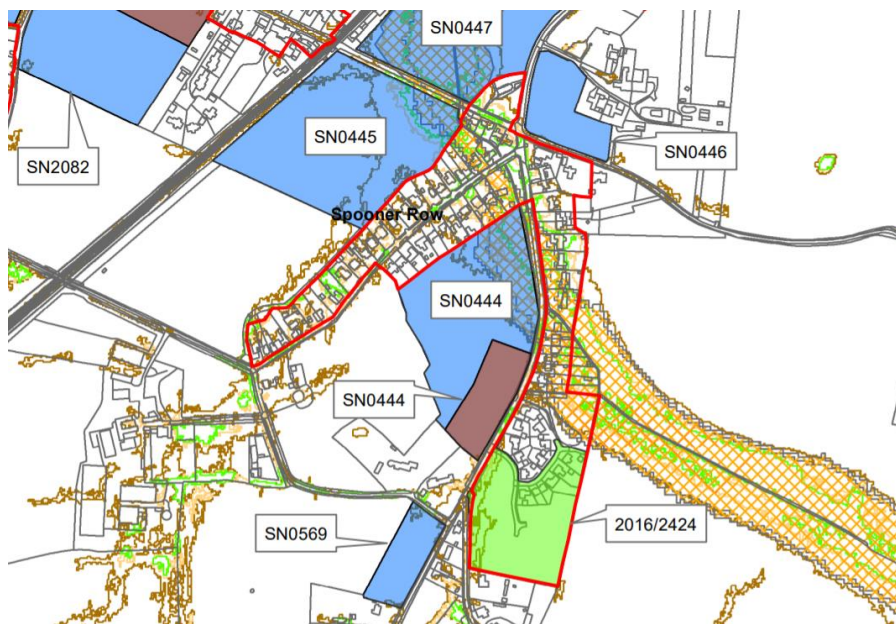


Figure 1: South Norfolk Village Clusters Housing Allocation Plan, Spooner Road extract

The site SN0444 comprises an area of open space separating the linear development along Bunwell Road and Queen Street.

The adopted Site Specific Allocations and Policies Document (page 129, 26 October 2015) notes that at Spooner Row, *‘the large open spaces between these settlement groups contribute to the character of the village.’*

In a similar way, the area of open space within the southern settlement group contributes to the character of the village by providing clear separation between the two linear developments along the east side of

Bunwell Road and Queen Street. The open space is particularly visible from Bunwell Road but is also visible from the southern end of Queen's Street.

The site allocation would therefore result in the loss of part of this open space, which would have an adverse impact on the form and character of the existing linear pattern of development. Indeed, the detailed Site Suitability Assessment includes comments in Part 4 (Site Visit) that the part of the site that is not constrained by flood risk is detached from the existing development to the north.

Development here would also have a detrimental impact on the approach to the village from the south along Bunwell Road; access to the site would also require the loss of most or all of the roadside hedgerow, a fact recognised in the Site Suitability Assessment.

In addition to this, the site allocation does not mention the nearby designated heritage asset, the Orchards, which is Grade II Listed. Whilst there is screening between the two sites, the proposals may have an impact on the setting on the adjacent Listed Building; this is acknowledged in the detailed Site Assessment.

The location of the preferred site allocation is therefore not appropriate and should be rejected.

SN0404 - Land at Chapel Road, Spooner Row

The Land at Chapel Road, Spooner Row has previously been promoted for development, but has not been identified as a Preferred Site Allocation. The Village Clusters Plan states that the site is unreasonable for the following reasons:

“Development of the site would constitute backland development and would have an adverse impact on the form and character of the existing linear pattern of development. It would also have a detrimental impact on the approach to the village from the north. Access would be required through existing allocation and may require the loss of additional hedgerow.”

We strongly disagree with these conclusions, and some of those included on the detailed Site Assessment Form, and recommend that site SN0404 (Land at Chapel Road, Spooner Row) should be allocated for residential development, comprising approximately 12-15 dwellings.

One of the reasons given for the Land at Chapel Row (SN0404) not being allocated for development is that it would constitute backland development and would have an adverse impact on the form and character of the existing linear pattern of development. For context, the site sits behind an allocated site (SPO1 in the South Norfolk Site Allocations and Policies Document), where planning permission was granted for 17 dwellings at Bunwell Road and 13 dwellings at Chapel Road, under consents 2012/2016/O, 2014/2472/RM, 2016/2424/F and 2018/1622. . Development commenced on site on the 30 May 2016 and to date 14 dwellings have been delivered at Bunwell Road and 0 at Chapel Road. It is intended to commence construction at Chapel Road later this year.

Whilst it is acknowledged that there is a single row of frontage development immediately opposite the site on the north-western side of Chapel Road, it would be disingenuous to suggest that there is an overriding character of single-depth development in this part of the village. Chapel Loke, immediately to the south-west comprises a small development of dwellings on a classic 'backland' site, with development three dwellings deep. Similarly, Pilgrims Farmhouse to the south comprises a cluster of buildings set well back from Chapel Road.

The depth of development resulting from development of site SN0404 and the consented site would mirror the depth of development on the opposite side of Chapel Road, where the dwellings have very long gardens in excess of 100m.

Consequently, we dispute the comments regarding development of the site being backland development and having an adverse impact on the form and character of the existing linear pattern of development.

The second reason for the site not being allocated is that would have a detrimental impact on the approach to the village from the north. We respectfully disagree with this conclusion. The landowner also owns the surrounding farmland, and it would be possible to plant a substantial landscape buffer along the north-eastern boundary of the site to ensure that views of the village from Wymondham Road to the north-east are suitably screened, to reduce the landscape impact of any development. Similarly, there is scope for substantial screening along the south-eastern boundary to soften views from Guiler's Lane to the south.

In relation to access, it is correct that this would be provided through the existing allocation, but it is not understood why this is deemed to be a reason for the site being considered unreasonable. A Transportation/Highway Statement has been prepared by Richard Jackson Engineering Consultants Ltd and is submitted in support of this Representation, which outlines that the access consented for the adjacent development would be entirely suitable to cater for an additional 12-15 dwellings; the visibility splays are correct for the speed of vehicles passing the site, and the consented Type 3 access road is suitable for serving up to 100 dwellings.

Whilst it is acknowledged that at the time of the previous planning application 2012/2016/O, Norfolk County Council (NCC) did comment upon the width of Chapel Road for the accessibility of vehicles to and from the site, this issue was not seen as a reason to refuse the 2012/2016/O planning application on highway grounds and as such the minor increase of traffic from an additional 15 dwellings is not seen as severe in highway terms. An additional 15 dwellings is likely to generate a very low level of trips during the peak hour, approximately 8 movements, and this very minor increase in traffic would not have a detrimental impact on the local road network.

No additional hedgerow loss would be required over and above that needed to facilitate access for the consented development.

In addition to the above, we also dispute a number of the conclusions reached in the Site Suitability Assessment.

The red ratings for both Access and Transport and Roads are considered to be highly disingenuous; a red rating indicates "no possibility of creating access to the site". The Site Suitability Assessment includes comments that the site appears remote from the highway with no defined means of access. It has been made clear in previous Representations that access would be via SPO1, and that whilst development of that site has not yet commenced, consent is in place. Development of site SN0404 would not, therefore be remote from the highway, and the means of access has already been approved. As set out above, the approved access is entirely capable of accommodating the additional development proposed.

Whilst there is no footway at present, the consented proposals for SPO1 include the provision of a footway, including a tactile crossing over Chapel Road, which links in with the existing footway provision leading to the village centre. This provides a continuous footway connection to all of the village's services, including the primary school. It is therefore considered that the rating should be corrected to green, as access by all means is possible.

We also disagree with the amber rating for Flood Risk. The site is in Flood Zone 1, and is not at risk of surface water flooding. Consequently, in accordance with the published methodology, the site should be rated green. The presence of small areas at low risk of surface water flooding on the highway should not result in an amber rating.

It is unclear why the site has been given an Amber rating in relation to the Historic Environment; the closest designated Heritage Asset is Grade II Listed Pilgrims Farmhouse, some 200m to the site. Whilst the site

abuts land associated with Pilgrims Farmhouse, there is extensive mature boundary screening, and consequently the site does not contribute in any way to the setting of the Listed Building. An Archaeological Desk Based Assessment was undertaken in support of the application 2012/2016/OUT on the adjacent land, which concluded that there are no features of archaeological interest, and it is assumed that this would also be the case for this site. Therefore, there are no likely impacts on the Historic Environment, and the rating should be downgraded to green.

Given the above, the site scores more favourably in the Suitability Assessment than SN0444, with fewer Amber ratings and more Greens.

There are also a number of misleading comments in the Site Visit Observations part of the Site Suitability Assessment. For instance, whilst it is correct that the site does not currently have defined boundaries, this is because it is part of a larger field, and it is erroneous to conclude that this means the visibility of the site would be increased. As previously set out, as the adjacent land is within the same ownership, there is ample opportunity to provide substantial boundary planting to the site.

In light of the above, the site is considered to be entirely suitable for residential development and represents a logical and low-impact location for further growth of the village.

We also wish to reiterate that the site is available for development immediately; it is within a single ownership, with no tenancies, and could be brought forward without delay. The landowner has an established track-record of delivering new homes in the village. There are no constraints that would threaten delivery of housing on the site; development of 12-15 dwellings here is entirely achievable. In addition, development of the site for residential purposes is considered viable, taking into consideration the various policy requirements in relation to matters such as affordable housing provision and CIL contributions.

As discussed previously, the site is adjacent to an allocated site (SPO1 in the South Norfolk Site Allocations and Policies Document), where planning permission for 30 dwellings under consents 2012/2016/O, 2014/2472/RM, 2016/2424/F and 2018/1622, was granted as part of a wider development including land to the east of Bunwell Road. Development commenced on site on the 30 May 2016 and 14 dwellings have been delivered at Bunwell Road and 0 at Chapel Road. It is intended to commence construction at Chapel Road later this year.

The proposed site allocation offers a logical extension to this development and therefore has the potential to improve the viability of the site SPO1 and 2016/2424, which has now stalled. Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary.

Summary

As outlined above, the site is suitable, available, achievable and viable, and is therefore deliverable. It also represents sustainable development. On this basis, the site should be taken forward as an allocation for residential development in the emerging Local Plan, in preference to site SN0444.

There is not an overriding character of single-depth development in this part of the village. The depth of development resulting from development of site SN0404 and the consented site would mirror the depth of development on the opposite side of Chapel Road, where the dwellings have very long gardens in excess of 100m. The site would therefore not have an adverse impact on the form and character of the existing linear pattern of development.

The landowner owns the surrounding farmland, and it would be possible to plant a substantial landscape buffer along the north-eastern boundary of the site to ensure that views of the village from Wymondham

Road to the north-east are suitably screened, to reduce the landscape impact of any development. The proposals would therefore not have a detrimental impact on the approach to the village from the north.

No additional hedgerow loss would be required over and above that needed to facilitate access for the consented development. Lastly, the site represents a more suitable location for development than Land West of Bunwell Road (SN0444), as it would not result in the loss of important open space, which the VCHAP acknowledges contributes to the character of the village. With the corrections to the Site Suitability Assessment set out above, the land at Chapel Road scores more favourably in the RAG ratings than site SN0444.

The site is considered to be entirely suitable for residential development and represents a logical extension to the village, with the ability to create a clear and defensible boundary to the settlement. The site is capable of delivering a modest quantum of development and allocating this site for housing would reduce the pressure on other, more sensitive, sites in the village. The site is available for development immediately, and there are no constraints that would threaten its delivery.