# Objection to Policy VCNEE1 and proposal to allocate the site opposite (Greenacres, 11 High Road) as a more reasonable alternative

## 1. Background:

Policy VC NEE1 results in the loss of a valuable open greenfield site (ref: SN2065REV) on the edge of Needham village, when there is a more suitable site directly opposite at Greenacres, 11 High Road.

This paper and supporting appendices provides evidence that the site at Greenacres, 11 High Road, Needham, represents a more 'reasonable alternative' as per the NPPF's tests for soundness. Furthermore, the loss of the site at VC NEE1 (ref: SN2065REV) would be damaging to the rural setting of Needham village as currently the site prevents a continuous line of development from the A143 roundabout.

Alternative development at the site opposite (Greenacres, 11 High Road) will have a less damaging impact on the rural setting of the village as it is already a residential plot with significant roadside screening.

Accordingly, development of site VC NEE1 is not the most sustainable option and is not consistent with the following paragraphs of the NPPF:

- Paragraph 8c: The environmental objective of the principal of sustainable development, namely: *"to protect and enhance our natural, built and historic environment; including making effective use of land"*
- Paragraph 119: "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment"

This inconsistency with the NPPF adds further weight to the assertion that VC NEE1 is 'unsound'.

## 2. Supporting evidence for an alternative allocation at Greenacres, 11 High Road

The site at Greenacres, 11 High Road is a large residential garden with a paddock to the rear. It is directly opposite the site allocated at VC NEE1. The area of the site is slightly smaller than the one allocated at VC NEE1 (~0.8 ha).

The site is occupied by a detached residential dwelling with a number of outhouses (garages, sheds, summerhouse). All of these buildings are in a poor state of repair, and the garden has not been well maintained for a number of years.

Unfortunately, the site at 11 High Road (Greenacres) was not promoted at the 'Call for sites' for this South Norfolk Village Clusters Housing Allocations Plan. However, the site had been proposed for allocation at the previous Local Plan review some years earlier. It is somewhat disappointing that as part of their preparations the Council did not explore sites that had

previously been put forward, although it is recognised there was no obligation for the Council to do so.

The following papers have been provided as part of the evidence in support of the site:

- Appendix 1: Site Assessment Form
- Appendix 2: Landscape Visual Appraisal
- Appendix 3: Arboricultural Report

Both the Site Assessment Form and the Landscape Appraisal have followed the format used by South Norfolk and Broadland council, to aid comparison between the site at Greenacres and other allocations. As Greenacres is directly opposite site VC NEE1 much, but not all, of the content of the forms mirrors the content previously prepared for VC NEE1. It is important to note that these appendices (for Greenacres) have not been prepared by South Norfolk Council and the assessments/appraisals contained within will still need to be validated by the planning team. However, they have been prepared as objectively as possible and in line with the methodology used for other allocated sites. As an example, given the importance of some of the trees on the site an independent arboricultural report (appendix 3) has been commissioned in line with BS5837. Further commentary on the trees is provided below.

### 3. Location of Greenacres, 11 High Road relative to the site at VC NEE1 (ref: SN2065REV)

The plan below shows the location of both sites and the settlement limit marked in orange:







The aerial view of High Road highlights the importance of site VC NEE1 to retaining the rural character of the village. Whilst it is accepted that the site at VC NEE1 has limited landscape value in its own right, as an open field it acts as an important buffer at the edge of the current village settlement limit, and prevents a continuous sprawling conurbation beginning immediately from the A143 roundabout.

Greenacres on the other hand would be well screened from virtually all directions by retaining much of the existing hedgerows/boundary trees, and accordingly development at this location will have much less visual impact on the village. Development here would also be more focused on a single area rather than the linear stetch of development along High Road envisaged at VC NEE1.

An important consideration for developing the site at Greenacres is the visual impact on the River Waveney valley. In this regard it is important to note that:

- Public views from the river valley to the rear are very limited as there are no Public Rights of Way in this vicinity to the rear.
- The visual impact of any development at Greenacres would be significantly reduced by retention of the treeline to the south of the plot, and

• The overall visual impact is already adversely affected by neighbouring farm buildings – the incremental visual impact of development at Greenacres will be modest.

### 5. Arboricultural Report for Greenacres and associated trees on site

Appendix 3 is an independent arboricultural report for Greenacres. The report notes that there are many trees on site of both high, medium and low quality.

Paragraph 4.6 of the report states: "The site is well screened by existing boundary trees and hedges. It is suggested that any development would have minimal visual impacts provided this screen is retained".

It is expected that any development of the site would require the bulk of the trees that are not located on the boundaries to be removed. This includes both Category B and C trees, and possibly one or two category A trees in the front garden. The majority of the Category A trees are located on the boundaries and would not be expected to be removed.

Clearly removal of any trees is unfortunate but this should be assessed against the salvation of the greenfield site opposite. Furthermore, it should be noted that even if the site is not redeveloped, and the existing dwelling is retained, then any future owner is likely to undertake a significant degree of pruning and tree removal in order to return the garden to its original manicured state.

Paragraph 6.3 of the report concludes: "Based on the proposed tree constraints plan, we consider that development can be accommodated on this site but that even after a high degree of tree removal, a good number of trees would need to be retained which may reduce the density of development on the site."

The promoter accepts that tree retention may reduce the density of any potential development on the site. However, it is still considered that with careful planning the site can still accommodate the minimum 12 dwellings needed for a site to be formally allocated in line with the Village Clusters Allocation plan.

Peter Tavner

11 High Road Needham,

6<sup>th</sup> March 2023

#### Appendices:

- 1. Site Assessment Form
- 2. Landscape Appraisal
- 3. Arboricultural Report