

## Reg. 19 VCHAP Consultation - Supporting Statement

Land north of Station  
Road, Forncett St  
Peter, NR16 1JA  
(Site ref. SN5027).



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### Prepared for Clients:

Silke Marsh & Jonathan Marsh



**PREPARED BY:** Magnus Magnusson, MRTPI.

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### Our Offices:

<b>NORFOLK</b>	T: 01603 516319
<b>SUFFOLK</b>	T: 01284 336348
<b>CAMBRIDGESHIRE:</b>	T: 01223 637283
<b>LINCOLNSHIRE</b>	T: 01780 437333
<b>ESSEX</b>	T: 01245 934184

Norwich	NR20 3LR
Bury St Edmunds	IP33 1HQ
Cambridge	CB24 6WZ
Stamford	PE9 2AE
Chelmsford	CM2 7PX

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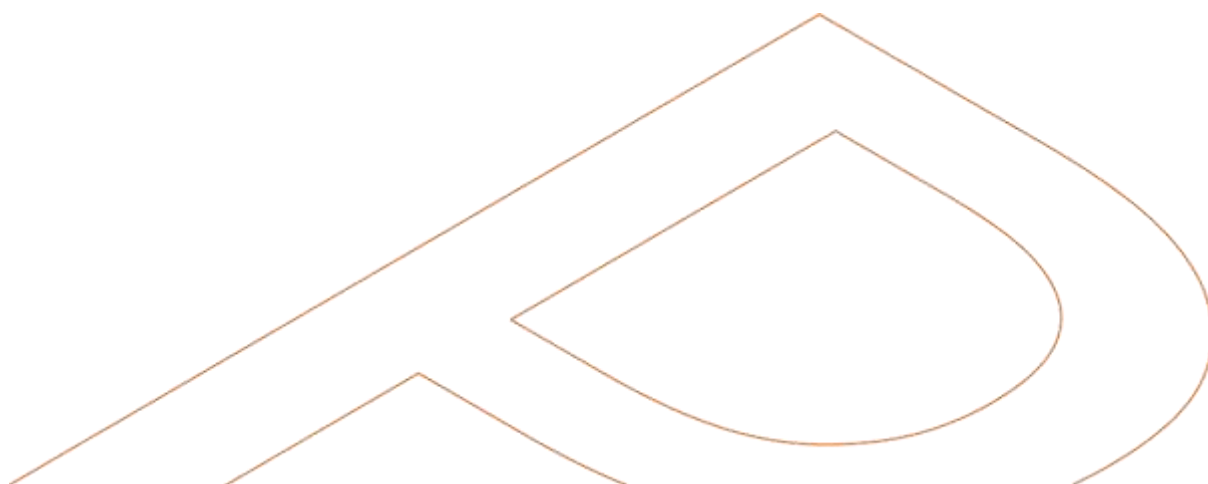
## REPORT INFORMATION

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<b>Date of Submission</b>	March 2023
<b>Consultation</b>	Regulation 19 South Norfolk Village Clusters Housing Allocations Plan (VCHAP).
<b>Local Planning Authority</b>	South Norfolk District Council (SNDC).
<b>Client</b>	Silke Marsh & Jonathan Marsh.
<b>Our Reference</b>	J3919
<b>Report Revision</b>	V1.0



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## **1.0 Introduction**

- 1.1** The South Norfolk Village Clusters Housing Allocations Plan (VCHAP) aims to deliver sustainable growth within the villages of South Norfolk. The VCHAP is being developed alongside the Greater Norwich Local Plan (GNLP) and in accordance with the Government's national planning policies and guidance.
- 1.2** Overall, the Reg. 19 draft VCHAP identifies 45 new residential allocations and 11 residential allocations that have been carried forward from the South Norfolk Site Allocations and Policies Document (adopted 2015).
- 1.3** The sites within the Village Clusters are split into two categories:
- **New Allocations** - these are sites typically proposed for between 12 to 50 dwellings, which will go to meeting the 1,200-dwelling requirement in the GNLP,
  - **Settlement Limit Extensions** - for sites smaller than 12 dwellings, these will not count towards the 1,200-dwelling requirement but will help ensure that the 'windfall allowance' in the 'over-arching' Greater Norwich Local Plan (GNLP) is achieved.
- 1.4** My client's site known as land north of Station Road, Forncett St Peter (Council Reference SN5027) lies within the *Forncett St Peter and Forncett St Mary Village Cluster* and was submitted to SNDC for consideration as an allocation as part of the Reg. 18 VCHAP *Preferred Options* consultation 'call for sites' (CFS) in the summer of 2021. However, the site has not been 'included' as an proposed allocation within the context of the Regulation 19 version of the VCHAP.
- 1.5** **Part A** of this statement is intended to affirm the *suitability, availability* and *achievability* of my clients' site as an allocation (possibly for self-build dwellings) within the context of the emerging VCHAP. It is also requested that the information provided within this section informs the future assessment of the site as undertaken by the Council as part of their review of the Housing and Economic Land Availability Assessment (HELAA) that will in itself inform any future reviews of the VCHAP once adopted.
- 1.6** The publication of the Reg. 19 version of the VCHAP provides an opportunity

for the public and other stakeholders to make representations on whether the Plan is legally compliant and 'Sound'. The tests of **soundness** are set out in the National Planning Policy Framework (NPPF, 2021) are as follows:

- Positively prepared,
- Justified,
- Effective,
- Consistent with national policy.

**1.7 Part B** of this this statement identifies the reasons why the VCHAP strategy (including distribution and quantum of development) is potentially an 'unsound' one with the omission of my clients' site as an allocation.

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## **2.0 Site and Context**

- 2.1 Forncett St Mary and Forncett St Peter are both linear in form and have developed along Aslacton Road/Low Road which follows the line of the Tas Valley.
- 2.2 The cluster's school is in Forncett St Peter, with Forncett St Mary housing the village hall. There is a limited bus service to Norwich and Diss.
- 2.3 The Settlement Limit has been drawn around the cluster of linear development at Forncett St Mary, leaving the more dispersed outlying areas outside and around the existing built-up area of Forncett St Peter.
- 2.4 My clients' site lies to the north-east and outside of the settlement boundary as proposed for Forncett St Peter and to the east and outside of the settlement boundary as drawn for Forncett St Mary (see appendix A). Importantly, however, my clients' site is not isolated in any physical or functional sense, lying adjacent to existing residential development and bus stops providing access to services and facilities in higher order settlements.
- 2.5 My client's site area measures 1.80ha in its entirety and including the existing Station Bungalow dwelling on the western side and woodland on the northern and eastern parts. The open grassland/pastureland in the centre of the site measures some 0.67ha and it might be that this part of the sites comes forward as an allocation for residential development, (see blue line, fig. 1.1 below), thus retaining the bungalow and woodland.
- 2.6 My client has previously indicated that they would be willing to make the wooded area available as publicly accessible space on allocation.
- 2.7 The site is bound by Station Road to the south, beyond which is the recent Hunts Mead residential development. To the north and east and beyond the woodland lies agricultural land (under cultivation). The site is bound to the west by the Diss – Norwich railway line.



***Fig. 1.1 – My client’s site in its entirety (red line, 1.80ha) and blue line delineating that part of the site (0.67ha) that could come forward for development (as an allocation within the VCHAP) whereby the Station Bungalow with curtilage and wooded area to the east are retained. The site access point can be moved eastwards and along Station Road to improve visibility.***

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### **3.0 PART A - Site Assessment – HELAA - Suitability, Availability, Achievability (including viability)**

#### **Suitability**

- 3.1 The combined settlements of *Forncett St Peter* & *Forncett St Mary* are identified as a 'village cluster' in respect of the consultation draft VCHAP.
- 3.2 The Village Clusters are considered to be 'suitable' or 'sustainable' locations for new residential development to meet a proportionate amount of the housing need of the sub-region, and South Norfolk specifically. Consequently, the overarching strategic planning document, the GNLP, provides for 1,200 new homes to be allocated across all of the Village Clusters up to 2038.
- 3.3 To assess the 'suitability' of specific sites for inclusion within the HELAA 'capacity assessment' and ultimately the VCHAP (and subsequent reviews of the VCHAP itself), the HELAA methodology (2016) document prescribes a **red**, **amber**, **green** (RAG) approach to assessing various types of 'constraints' on a site's deliverability in addition to potential 'impacts' arising.
- 3.4 Parker Planning undertook their own RAG assessment in accordance with the HELAA Methodology Document (2016) that demonstrated the suitability of our clients' site for inclusion within the HELAA housing capacity assessment and as an allocation within the context of the VCHAP (or any subsequent review).
- 3.5 It is not the intention of this statement to simply repeat the information provided within the context of the Reg. 18 response here. Rather, this section will consider SNDC's own assessment of the site that followed the sites submission to the Council in the summer of 2021 (see appendix B).

#### **Potential Site Constraints**

- 3.6 **Access to site** – NCC (Highways) have identified site access as a 'red' and that it is 'unlikely' that satisfactory visibility could be achieved (Appendix .



B). As identified within the context of our 2021 CFS submission, there is the possibility that the site access can be moved eastwards and along Station Road to improve visibility. Further dialogue with NCC (Highways) should be sought on this matter and possibly to include submission of appropriate visibility splay drawings.

3.7 Furthermore, NCC (Highways) identify that there is no footway to the catchment primary school. However, my clients' site is not unique in this respect, with proposed allocations featured within the VCHAP also lacking existing and continuous footways from the site to key services and facilities.

**RAG assessment = Amber.**

3.8 **Access to Local Services and facilities** - Our client's site is well related to both Forncett St Mary and Forncett St Peter and the services and facilities available within the cluster and including school and village hall.

3.9 Furthermore, my client's site is extremely well related to higher order settlements including Tacolnestone and Forncett End, (Service Village), 1.75 miles, and Long Stratton, (Key Service Centre), 1.5 miles. There is an existing bus stop in very close proximity of the site, (within 40m – see fig. 1.1 above), connecting the site with the aforementioned and other 'higher order' settlements. **RAG assessment = Green.**

3.10 **Utilities Capacity** – Although predominantly 'greenfield', the site relates well to existing development including the *Hunts Mead* on the opposite side of Station Road. There is no evidence to suggest that utilities capacity will be a constraint, albeit the Environment Agency consider that mains foul water drainage capacity will require further 'consideration' in liaison with AWS (appendix B). **RAG assessment = Green.**

3.11 **Utilities infrastructure** – Again, although predominantly 'greenfield', the site relates well to the existing development/utility infrastructure including *Hunts Mead*. Again, there is no evidence to suggest that utilities infrastructure will be a constraint. **RAG assessment = Green.**

3.12 **Contamination** – There is no indication that my client's site, that is predominantly 'greenfield', has contamination issues or has been subject to any (previous) contaminating land-uses. There are no known potential

ground stability issues either. **RAG assessment = Green.**

**3.13 Flood Risk** – The Lead Local Flood Authority (LLFA) have identified (appendix B) that surface water flood risk, whilst not precluding development, is likely to require mitigation. This might be in the form of SuDS at the design stage. Furthermore, the LLFA identify that a large area of the site is unaffected by flood risk and has the potential to be developed.

**3.14** Whilst it is considered that the access to the site might be affected by flooding issue, it has already been identified that the access can be moved outside of any high-risk area. **RAG assessment = Green.**

**3.15 Coastal Change** – This site is located some distance from the coast and is not associated with any Coastal Hazard Zone(s) or similar. **RAG assessment = Green.**

**3.16 Market Attractiveness** – This is an extremely popular place to live with a demonstrable need for both market and affordable homes. Our client can confirm that development is viable. Furthermore, A Community Infrastructure Charge (CIL) is levied in the 'Village Cluster' which would suggest that development in this location must be viable. **RAG assessment = Green.**

### **Potential Site Impacts**

**3.17** SNDC's own assessment (Appendix B, landscape) identifies that the developable area of the site is 'contained' and as such development would have very little impact on the wider landscape providing the wood and trees are retained.

**3.18** SNDC's assessment (appendix B, townscape) similarly finds that the developable area is contained and there are existing dwellings to the south where Hunts Mead has created a cul-de-sac. **RAG assessment = Green.**

**3.19 Biodiversity and geodiversity** – There are no known biodiversity or geodiversity interests that will preclude development on the site. Furthermore, the NCC (Ecologist) has assessed this potential impact as 'green' albeit development of the woodland ought to be avoided, (see appendix B). **RAG assessment = Green.**

**3.20 Historic environment** – NCC’s Historic Environment Service

(HES) have found that there are no nearby heritage assets affected, the closest being some approx.150m away (see appendix B).

**3.21** The HES also identify that the railway line is a Site of Archaeological Interest although this does not form part of the proposed allocation/developable area. **RAG assessment = Green.**

**3.22 Open Space** – The site is not the subject of any ‘open space’ designation(s). Appropriate and accessible open space will be provided on site, the quantum of which will be agreed with the LPA in due course. In addition, were the site to be allocated, my client would be agreeable to making the wooded area to the east of the site publicly accessible. **RAG assessment = Green.**

**3.23 Transport and Roads** – My client’s site is extremely accessible via the existing road network. Furthermore, the Government’s CrashMap data (online resource) finds that there have been no reported accidents in the vicinity of the site access in the last 10 years (see appendix D). The SNDC assessment (appendix B) identifies that there is a road link to Long Stratton and consequently through to the A140. **RAG assessment = Green.**

**3.24 Compatibility with neighbouring uses** – The proposed development will be entirely compatible with the neighbouring land uses. There is existing residential development to the south and west of the site including the recent *Hunts Mead* housing estate (see fig. 1.1 above). **RAG assessment = Green.**

**3.25** The overall assessment of the council (Appendix B) is that the site is considered an ‘unreasonable’ option for development. However, issues identified by the SNDC (flood risk and highways in particular) are capable of mitigation and following further dialogue with the responsible authorities, namely NCC (Highways), the EA and AWS.

**3.26** The above ‘suitability’ criteria are just one element of the assessment for the HELAA. In addition to establishing whether sites are potentially suitable for development, sites are also assessed in terms of whether they are ‘available’ for development and whether they are ‘achievable’.

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### **Availability**

**3.27** A site will normally be considered available by the Council and within the context of the HELAA/VCHAP if it is in the ownership of a developer or landowner who has expressed an intention to develop or sell the land for development. Site SN5027 remains under the control of landowners who are actively promoting the site for development within the emerging VCHAP process.

### **Achievability (including viability)**

**3.28** A site will be considered achievable within the context of the HELAA/VCHAP where there is a reasonable prospect that development will occur on the site at a point in time. A key determinant of this will be economic viability of the site. This will be influenced by the market attractiveness of a site, its location in respect of property markets and any abnormal constraints on the site.

**3.29** It is considered that development on this site remains viable, being in an area with considerable demand for both market and affordable dwellings (including self-build). Indeed, the Community Infrastructure Levy (CIL) is applied to new developments with the Village Cluster, which in itself proves that development must be viable.

**3.30** Furthermore, there remain no abnormal constraints pertaining to the site that would require mitigation and that might otherwise impact on viability.

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## **4.0 Part B - Regulation 19 - Test of soundness considerations**

4.1 Para. 35 of the NPPF identifies how Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are **sound**. Plans are considered 'sound' if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development,
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence,
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground and,
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

4.2 Following appropriate assessment of all 'known' sites in and around the 'Village Cluster' within the context of (among other) the Housing and Economic Land Availability Assessment (HELAA) and Sustainability Appraisal (SA/SEA) processes, no sites have been identified as proposed allocations.

4.3 It is the HELAA and SA/SEA process that should determine the most suitable sites(s) for allocation. The HELAA assessment (Part A above) would suggest that my clients' site would be suitable for development, possibly subject to mitigation measures in respect of highways and flooding.

4.4 Para. 5.4.4. of the SA/SEA (AECOM, 2023) finds that village clusters with only 'rejected' sites are not reviewed, i.e., no further consideration is given to the option of allocating one or more of the sites. However, footnote 8 to para. 5.5.4. identifies that Village clusters *not discussed below, but with better accessibility credentials are: Forncett St Mary and Forncett St Peter*

(in fairly close proximity to Long Stratton, albeit via rural lanes).

Indeed, my clients' site lies closer to the 'higher order' settlement of Long Stratton than the proposed settlement limits of either Forncett St Peter or Forncett St Mary.

- 4.5 Furthermore, The SA/SEA of the VCHAP finds my client's site performing equally well if not 'better' against the topics/objectives than the other sites considered yet rejected for the Village Cluster (see table 1.1 below). This is despite the fact that my clients' site is isolated from the aforementioned and currently proposed settlement limits of Forncett St Mary and Forncett St Peter.

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
Forncett St Mary and Forncett St Peter	Forncett - SN1002 - Forncett St Peter	Yellow	Green	Yellow	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
	Forncett - SN0089 - Land South Of Common Road	Yellow	Green	Yellow	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red
	Forncett - SN1040 - Land At Mill Road/Overwood Ln/Gilderswoo	Yellow	Green	Yellow	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
	Forncett - SN1039SL - Kilamay Farm, Wash Lane	Green	Green	Yellow	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
	Forncett St Mary - SN0599REV - Four Seasons Nursery, St Mary	Red	Green	Yellow	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
	Forncett St Mary - SN2028 - Low Road	Yellow	Green	Yellow	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
	Forncett St Mary - SN0429SL - Land Off Spicers Lane	Yellow	Green	Yellow	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
	Forncett St Peter - SN5027 - Land Nth Station Road	Yellow	Green	Yellow	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
	Forncett St Peter - SN0094 - Land North Norwich Road (B1113)	Yellow	Green	Yellow	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red
	Forncett St Peter - SN2058 - Tawny Farm, Forncett St Peter	Yellow	Green	Yellow	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green

**Table 1.1 – 'Performance' of my clients' site compared with other 'rejected' sites in the Village Cluster, (SA/SEA, AECOM, 2023).**

- 4.6 We contend that our client's site (reference SN2118) should be allocated as part of the emerging GNLP to ensure that it meets the tests of soundness and Framework in the following regards:

- **Positively prepared** – Provides an appropriate growth strategy for the *Forncett St. Mary and Forncett St Mary Village Cluster*, (and the wider VCHAP area) that meets objectively assessed needs. The NPPF (2021, para. 23), is clear insofar as Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient

rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.

- **Justified** – Provides an appropriate strategy that is commensurate with this Village Cluster’s status in the ‘Spatial Strategy’ and takes into account a site that is ‘suitable’ (sustainable) as evidenced by the VCHAP’s supporting documentation.
- **Effective** – Ensuring the VCHAP includes a site allocation for this Village Cluster that is demonstrably deliverable within the plan period. In order to be genuinely plan-led (NPPF, para. 15) and ensure that the VCHAP is effective, the Council should seek additional allocations now through the plan-making process to provide an additional supply buffer. Additional allocations will also ensure the plan is ‘positively prepared’ to meet identified housing needs including any unmet needs of the Greater Norwich sub-region more generally.
- **Consistent with national policy** – Meeting the ‘tests’ of the *Framework* insofar as plan-making is concerned including the requirements that plans are positively prepared.

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## **5.0 Contribution to VCHAP Objectives**

### **SNVC Objective 1 - Meeting housing needs**

- 5.1 My clients' site would potentially provide opportunities for 'self-builds' as an allocation thus contributing to this objective.
- 5.2 Para. 62 of the NPPF (2021) finds that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

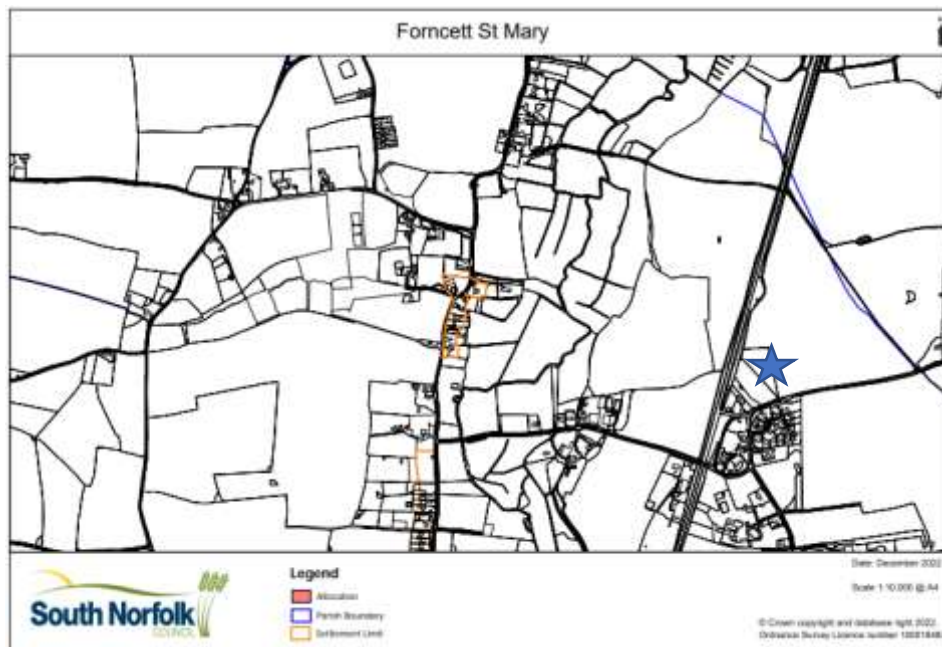
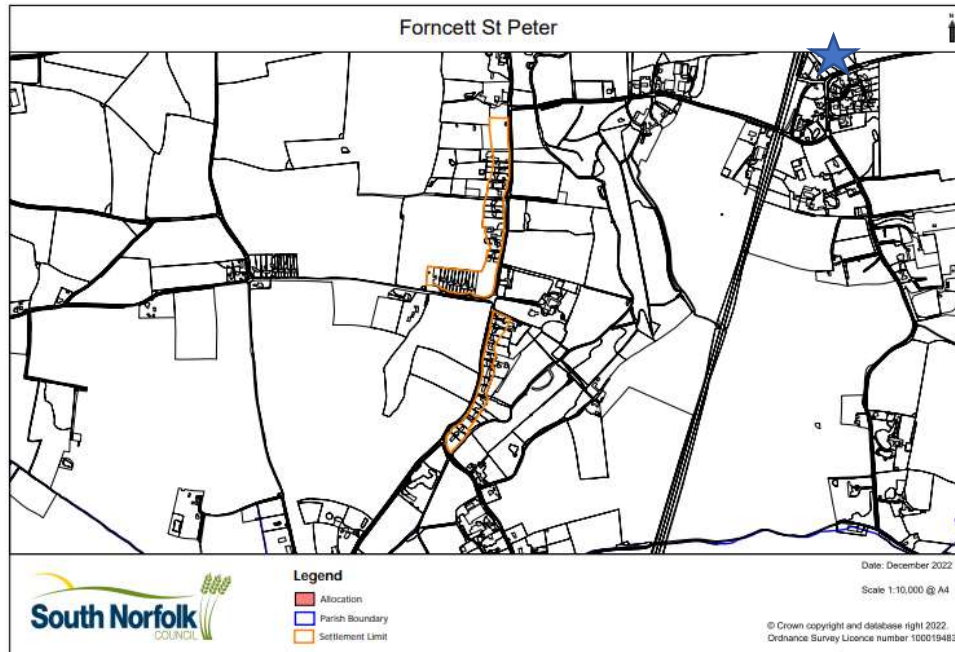


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## **6.0 Concluding Remarks**

- 6.1 For the reasons outlined within this Statement, my clients' site (SN5027) is considered *suitable, available and achievable*.
- 6.2 To ensure that the strategy for this Village Cluster is commensurate with this its position in the spatial hierarchy and to ensure that the VCHAP, in more general terms, meets the tests of 'soundness', my clients' site should be allocated for development for up-to 20 residential (possibly self-build) units.
- 6.3 Furthermore, we kindly request that our client's site is assessed within the context of the HELAA as and when this key Local Plan evidence base next document is updated and in view of the information provided within this Statement. It is this document will inform site selection for reviews of the VCHAP in due course.
- 6.4 Parker Planning Services would like to be kept up to date with the progress of the VCHAP and reserve the right to participate in the forthcoming Examination Hearings. For further information, or to discuss, please contact Magnus Magnusson on 01284 336119 or [magnus@parkerplanningservices.co.uk](mailto:magnus@parkerplanningservices.co.uk).

## Appendix A – Forncett St. Peter & Forncett St. Mary Reg. 19 Policy Maps



**Position of my clients' site** ★

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## **Appendix B – New, Revised & Amended Site Assessment Forms (Forncett St Peter & Forncett St Mary, SNDC, December 2022).**

### **Forncett St Mary & Forncett St Peter Village Cluster Site Assessment Forms**

**New, Revised & Amended Sites  
December 2022**

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### SN Village Clusters Housing Allocations Document – Site Assessment Form

#### Part 1 - Site Details

Detail	Comments
Site Reference	SN5027
Site address	Land north of Station Road, Forncett St Peter
Current planning status (including previous planning policy status)	Outside development boundary
Planning History	Various householder applications for Station bungalow.  Site to south: 2011/0016 Removal of Oil Depot and redevelopment for 17 dwellings Outline approved, 2014/0290 Reserved matters approved.
Site size, hectares (as promoted)	Up to 1.80ha with 0.67ha for residential and remaining as public open space/woodland
Promoted Site Use, including (a) Allocated site (b) SL extension	Allocated site
Promoted Site Density (If known – otherwise assume 25 dwellings/ha)	45 dwellings at 25dph on 1.80ha 17 dwellings at 25dph on 0.67ha
Greenfield/ Brownfield	Greenfield

#### Part 2 - Absolute Constraints

**ABSOLUTE ON-SITE CONSTRAINTS** (If 'yes' to any of the below, the site will be excluded from further assessment)

Is the site located in, or does the site include:	Response
SPA, SAC, SSSI, Ramsar	No
National Nature Reserve	No
Ancient Woodland	No
Flood Risk Zone 3b	No

3

Is the site located in, or does the site include:	Response
Scheduled Ancient Monument	No
Locally Designated Green Space	No

### Part 3 - Suitability Assessment

#### HELAA Score:

The RED/ AMBER/ GREEN score in the HELAA Score column below is based upon the assessment criteria set out in Appendix A of the 'Norfolk Housing and Economic Land Availability Assessment (July 2016)' methodology.

#### Site Score:

Where a HELAA Assessment has indicated either a RED or AMBER score, has the promoter of the site submitted any supporting evidence to indicate that the issues can be overcome (e.g., a Flood Risk Assessment, Contaminated Land Survey, Ecological Survey)? If yes, and if appropriate, note any changes to the HELAA score in the Site Score column. Additional criteria have been included under 'Accessibility to local services and facilities' and 'Landscape', which need to be reflected in the Site Score.

(Please note boxes filled with grey should not be completed)

#### SUITABILITY ASSESSMENT

Constraint	HELAA Score (R/ A/ G)	Comments	Site Score (R/ A/ G)
Access to the site	Amber	<p>There is an existing access to service the site. Promoter has suggested that, should it be necessary, a new access point can be created further eastwards along Station Road. This could improve visibility given the access as existing is in relatively close proximity of a bend in the highway.</p> <p><b>NCC Highways</b> – Red. Unlikely to be able to achieve satisfactory visibility due to road alignment. Network poor alignment adj to site, forward vis concern, no footway to catchment primary school.</p>	Red

Constraint	HELAA Score (R/ A/ G)	Comments	Site Score (R/ A/ G)
<b>Accessibility to local services and facilities</b>  <b>Part 1:</b> <ul style="list-style-type: none"> <li>Primary School</li> <li>Secondary school</li> <li>Local healthcare services</li> <li>Retail services</li> <li>Local employment opportunities</li> <li>Peak-time public transport</li> </ul>	Amber	Primary School; 1,700m  Long Stratton; Manor Field Infants; 2,700m High School; 2,600m Medical practice; 2,200m  Bus stop located 50m along Station Road. Bus service 1 (Konect): runs to Diss to Norwich 4/5 times 6 days a week.	N/A
<b>Part 2:</b> Part 1 facilities, plus <ul style="list-style-type: none"> <li>Village/ community hall</li> <li>Public house/ café</li> <li>Preschool facilities</li> <li>Formal sports/ recreation facilities</li> </ul>	N/A	Forncett Village Hall; 1,600m Long Stratton Leisure Centre; 2,300m	Green
<b>Utilities Capacity</b>	Red	Promoter states that there is no evidence to suggest that utilities capacity will be a constraint.  <b>Environment Agency:</b> Amber. Mains Foul drainage goes to Forncett St Peter WRC - this serves 93 people and we do not have any measured flow information for it. Permitted Dry Weather Flow (DWF) data is recorded as 31.3 m3/day. This equates to around 90 houses in total, so this WRC would likely have limited capacity as already serves 93 people. Further consideration would need undertaking in liaison with AWS.	Amber
<b>Utilities Infrastructure</b>	Amber	Promoter indicates that provision will need to be made for utilities infrastructure and given the	Amber

Constraint	HELAA Score (R/ A/ G)	Comments	Site Score (R/ A/ G)
		predominantly greenfield nature of the site, such utilities are readily available and given the proximity of existing development that includes the recent Hunts Mead residential development opposite.	
Better Broadband for Norfolk	N/A	Available to some or all properties and no further upgrade planned via BBFN.	Green
Identified ORSTED Cable Route	N/A	Not within identified cable route or substation location.	Green
Contamination & ground stability	Amber	No known ground stability issues. Variety of existing uses – may need investigation.	Amber
Flood Risk	Red	<p>Flood Zone 1 Surface Water Flood Risk 1:30 High Risk running straight through the open, developable part of the site.</p> <p><b>LLFA</b> – Amber. Surface water flood risk, would not prevent development but would need significant mitigation. The site is affected by minor flowpath in the 3.33% AEP event and minor/moderate flow path in the 0.1% AEP event. The flow path cuts the site southeast-west. Flow lines indicate this flood water flows west off of the site. This needs to be considered in the site assessment.</p> <p>A large area of the site is unaffected by flood risk and has the potential to be developed.</p> <p>Any water leading from off-site to on-site should be considered as part of any drainage strategy for the site.</p> <p>EA mapping indicates high water depth in the flow path.</p> <p>Access to the site may be affected</p>	Red



Constraint	HELAA Score (R/ A/ G)	Comments	Site Score (R/ A/ G)
		by the on-site and off-site flood risk.	

Impact	HELAA Score (R/ A/ G)	Comments	Site Score (R/ A/ G)
SN Landscape Type: (Land Use Consultants 2001)  Rural River Valley Tributary Farmland Tributary Farmland with Parkland Settled Plateau Farmland Valley Urban Fringe Fringe Farmland	N/A	Tributary Farmland  Rural River Valley adjacent to north-west along railway line.	N/A
SN Landscape Character Area (Land Use Consultants 2001)	N/A	B1 – Tas Tributary Farmland  A1-Tas Rural River Valley adjacent to north-west along railway line.  Agricultural Land classification: Non-agricultural use	N/A
Overall Landscape Assessment	Green	The developable areas of the site are contained and would have very little impact on the wider landscape providing the wood and trees are retained.	Green
Townscape	Green	The developable area is contained and there are dwellings to the south where Hunts Mead has created a cul-de-sac. However this site would extend to the north of Forncett Road and would add to development in a location that is completely separated from the main part of any settlement.	Amber
Biodiversity & Geodiversity	Amber	The paddock area has relatively low habitat value being solely grass but it does form a link between the wooded area and hedge lines	Amber



Impact	HELAA Score (R/ A/ G)	Comments	Site Score (R/ A/ G)
		<p>surrounding. Would require investigation.</p> <p><b>NCC Ecologist:</b> Green.</p> <p>Avoid development in woodland (not identified as priority habitats).</p> <p>SSSI IRZ - allocation of 43 houses falls below threshold for consultation for residential/ rural residential.</p> <p><b>Environment Agency:</b> Forncett St Peter WRC discharges to the Tas, a tributary of the River Yare. This river is likely to be in the Nutrient Neutrality area, where off-setting of development is required for development to protect the European sites of Yare Broads &amp; Marshes.</p>	
Historic Environment	Green	<p>No nearby heritage assets affected, closest is approx.150m away.</p> <p>The railway line is a Site of Archaeological interest.</p> <p><b>HES - Amber</b></p>	Green
Open Space	Green	No	Green
Transport and Roads	Amber	<p>There is a road link to Long Stratton and consequently through to the A140.</p> <p>Station Road has bus stops however pedestrian access in either direction is dangerous, no footpath and unlit. No safe route to school.</p> <p><b>NCC Highways - Red.</b> Unlikely to be able to achieve satisfactory visibility due to road alignment. Network poor alignment adj to site, forward vis concern, no footway to catchment primary school.</p>	Red

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Impact	HELAA Score (R/ A/ G)	Comments	Site Score (R/ A/ G)
Neighbouring Land Uses	Green	Residential and agricultural. Railway line along entire north-west boundary.	Green

## Part 4 - Site Visit

Site Visit Observations	Comments (Based on Google Street View images dated April 2021)	Site Score (R/ A/ G)
Impact on Historic Environment and townscape?	No impact on historic environment. It is acknowledged that there has been relatively recent development opposite at Hunts Mead but this was a brownfield site and was considered an improvement on the previous oil depot. This site is different and, in townscape terms, it would represent a consolidation of development in this unsustainable location.	N/A
Is safe access achievable into the site? Any additional highways observations?	Two existing accesses, one to the bungalow and one further north-east to the area of grassed land.  Both on the outside of a severe bend and would require Highway Authority consult.  No paths or streetlights and access by foot to any facilities would be dangerous.	N/A
Existing land use? (including potential redevelopment/demolition issues)	Part residential; Station Bungalow, part wooded, part open grassland (pastureland).	N/A
What are the neighbouring land uses and are these compatible? (Impact of development of the site and on the site)	Residential, woodland, railway. Would the railway restrict development in close proximity?	N/A
What is the topography of the site? (e.g. any significant changes in levels)	Level with a slight slope south-north and up from the road access.	N/A
What are the site boundaries? (e.g. trees, hedgerows, existing development)	Native hedge to frontage, tree belt to rear and wooded area to north-east.	N/A
Landscaping and Ecology – are there any significant trees/ hedgerows/ ditches/ ponds etc on or adjacent to the site?	Significant habitat with adjacent wooded area and hedges. Also pond in relatively close proximity to south, would need Ecologist advice.	N/A

Site Visit Observations	Comments (Based on Google Street View images dated April 2021)	Site Score (R/ A/ G)
Utilities and Contaminated Land – is there any evidence of existing infrastructure or contamination on / adjacent to the site? (e.g. pipelines, telegraph poles)	Telephone line across part of frontage.	N/A
Description of the views (a) into the site and (b) out of the site and including impact on the landscape	Minimal views from roadside but otherwise no long views as site is contained by woodland, railway and existing dwelling.	N/A
<b>Initial site visit conclusion</b> (NB: this is an initial observation only for informing the overall assessment of a site and does not determine that a site is suitable for development)	Only part of the total site identified would be developable for residential, the wooded area would have to remain, as would the tree belt along the railway.  However, although there are facilities in Long Stratton and Forncett St Peter, these are not accessible by foot given the lack of footpath and dangerous road conditions. This would be development in an unsustainable location.	Red

### Part 5 - Local Plan Designations

Local Plan Designations, including those in Neighbourhood Plans, should be noted in the table below (excluding Open Countryside which will apply to all sites promoted outside the Development Limits).

Local Plan Designations (UNIFORM)	Comments	Site Score (R/ A/ G)
None		N/A
		N/A
		N/A
<b>Conclusion</b>	Development of the site does not conflict with any existing or proposed land use designations.	Green

### Part 6 - Availability and Achievability

AVAILABILITY ASSESSMENT (in liaison with landowners)	Comments	Site Score (R/ A/ G)
Is the site in private/ public ownership?	Private	N/A
Is the site currently being marketed? (Additional information to be included as appropriate)	No	N/A
When might the site be available for development? (Tick as appropriate)  Immediately Within 5 years 5 – 10 years 10 – 15 years 15-20 years	Immediately	Green
Comments:		N/A

ACHIEVABILITY (in liaison with landowners, and including viability)	Comments	Site Score (R/A/G)
Evidence submitted to support site deliverability? (Yes/ No) (Additional information to be included as appropriate)	Promoter states that the site is viable, no evidence submitted.	Amber
Are on-site/ off-site improvements likely to be required if the site is allocated? (e.g., physical, community, GI)	Possible open space, access improvements.	Amber
Has the site promoter confirmed that the delivery of the required affordable housing contribution is viable?	Promoter indicated that it would be provided, no evidence to support viability.	Amber
Are there any associated public benefits proposed as part of delivery of the site?	Would be willing to make the wooded area to the north/east of the site accessible to the public on allocation.	N/A

### Part 7 - Conclusion

#### Suitability

The site is of a suitable size for allocation. The Highways Authority and LLFA have identified issues with the development of the site. In addition, the Environmental Agency has also flagged issues with Forncett St Peter WRC discharging into the Tas, a tributary of the River Yare.

#### Site Visit Observations

Only part of the site identified would be developable for residential, the wooded area would have to remain, as would the tree belt along the railway. However, although there are facilities in Long Stratton and Forncett St Peter, these are not accessible by foot given the lack of footpath and dangerous road conditions. This would be development in an unsustainable location.

#### Local Plan Designations

Outside development boundary. Located within Tributary Farmland, Rural River Valley adjacent to north-west along railway line.

#### Availability

The site is promoted by an Agent on behalf of the Landowner and appears available based on the information provided.

#### Achievability

No further constraints identified.

#### OVERALL CONCLUSION:

The site is considered an UNREASONABLE option for development. The site is heavily constrained by highways; the site is unable to achieve satisfactory visibility due to the existing road alignment. In addition, the surrounding road network is poor where the adjacent road alignment to site would result in forward visibility concerns which is exacerbated by no footway to catchment primary school. With regards to surface water flood risk, the LLFA have also highlighted that whilst the known flood issues would not prevent development, they would need significant mitigation. It has also been noted that the access to the site may be affected by the on-site and off-site flood risk.

#### Preferred Site:

Reasonable Alternative:

Rejected: Yes

Date Completed: 27/04/2022

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