



SOUTH NORFOLK VILLAGE CLUSTER HOUSING
ALLOCATIONS REGULATION 19 CONSULTATION- LAND
TO THE SOUTH OF CUCKOOFIELD LANE, BRACON ASH

PREPARED FOR MR HUMPREY BERNEY





Rural Solutions

SOUTH NORFOLK VILLAGE CLUSTER HOUSING ALLOCATION REGULATION 19 CONSULTATION

LOCATION

LAND TO THE SOUTH OF CUCKOOFIELD LANE, BRACON ASH

PROPOSAL

RESIDENTIAL ALLOCATION

ISSUE DATE

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I. INTRODUCTION

- I.1: We write on behalf of Mr Humphrey Berney to make further representations in relation to land to the south of Cuckoofield Lane, Bracon Ash proposed for allocation within the South Norfolk Village Clusters Housing Allocations Plan (SNVCHAP). These representations make the case for the site to be reconsidered and allocated for residential use within the emerging document.
- I.2: The site was promoted previously, by the landowner, as part of earlier rounds of consultation and Call for Sites on the SNVCHAP which inform this recent stage of consultation. The site is known by reference SN2087REVA within the Site Assessments report, December 2022. The site has been discounted by the Council on the following grounds:

OVERALL CONCLUSION: Rejected - The site is relatively well located in terms of the distance to local services and facilities. However, the site would diminish the small gap separating the settlements of Bracon Ash and Mulbarton. The irregular shape of the site, and the presence of TPO trees would constrain development and the backland nature of the site means it would have no relationship with Bracon Ash village. The access is the same as was proposed via the withdrawn application; however, this would involve taking a road through the boundary hedge into the agricultural field to the east of Park Nook, which would have a further urbanising effect and a negative impact on the landscape.

- I.3: These representations look to provide the Council with further information on the site which rebut the conclusions made, and which are considered to provide strong grounds for the site's allocation within the emerging Plan.
- I.4: It is important to note that there are no significant constraints, no ownership constraints and that development at the site is achievable. The site remains available for allocation and is brought forward for consideration for residential development for a small scale housing scheme (approximately 7 dwellings) which could deliver viably, associated landscaping and biodiversity enhancements.
- I.5: These representations set out the following information in support of the accompanying submission form and location plan:
- Section 2 – An overview of relevant policy matters;
 - Section 3 – A description of the site and potential constraints;
 - Section 4 – A review of the previous site assessment carried out by the Council;
 - Section 5 – Summary of landscape matters;
 - Section 6 – Considers the Suitability of the site for allocation;

- Section 7 – Addresses the Deliverability of the site; and
- Section 8 – Concludes the representations.

2. OVERARCHING PLANNING POLICY

GREATER NORWICH LOCAL PLAN (GNLP)

- 2.1: The GNLP will build on the long established joint working arrangements for Greater Norwich, which have delivered the current Joint Core Strategy (JCS) for the area. The JCS plans for the housing and job needs of the area to 2026 and the GNLP will ensure that these needs continue to be met to 2038.
- 2.2: Like the JCS, the GNLP will include strategic policies to guide future development and plans to protect the environment. It will look to ensure that delivery of development is done in a way which promotes sustainability and the effective functioning of the whole area.
- 2.3: Although the Local Plan is for the Greater Norwich area as a whole, it still takes into account the unique requirements of the individual partners and South Norfolk is the most rural of the authorities. To reflect this, South Norfolk Council is carrying out further work to find suitable housing sites for housing in smaller villages.
- 2.4: It is essential to recognise some key elements that were set out in the Greater Norfolk Regulation 19 Pre-submission Draft Strategy:

Paragraph 29 – *The GNLP promotes housing choice and supports economic activity within the rural parishes that surround market towns and key service centres. It also aims to provide a greater degree of opportunity for smaller builders to develop with their local supply chains and bespoke designs. Such development helps address rural housing need and demand and supports and sustains local services and facilities in the rural area, such as village schools, community venues, shops, pubs and bus services. Recently, the effects of the Covid-19 pandemic have strengthened the shift to 'working from home' and reduced the need to travel frequently to central locations to work. The wider availability of faster and more reliable broadband has resulted in a change in the desirability of more rural properties in village locations.* [RSL emphasis].

Paragraph 32 – *South Norfolk District Council is at an advanced stage with its Village Clusters Housing Allocations Local Plan. The Regulation 18 preferred options consultation is anticipated in Spring 2021. There is an aspiration for every village cluster to have new housing sites allocated, with a focus on smaller sites, and to be in accordance with the overarching GNLP strategy which identifies sites for a **minimum** of 1,200 additional homes on top of the existing commitment of 1,392 homes* [RSL emphasis]

- 2.5: As such there is a policy requirement to identify a minimum requirement for the village clusters. The target is a minimum and therefore there is no cap on the quantum of sustainable development that will serve and boost the economy of vital rural settlements.

2.6: This is reaffirmed in draft GNLP Policy 7.4 Village Clusters.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF) 2021

2.7: The NPPF provides the overarching planning policies that guide development in England. The NPPF is confirmed as being a material consideration when determining applications for development.

2.8: At the heart of the NPPF is the 'presumption in favour of sustainable development' which is seen as a golden thread running through both plan making and decision taking. This presumption in favour of sustainable development applies both to rural as well as urban areas. Paragraph 79 of the NPPF notes that,

'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.'

2.9: In a wider context of identifying and allocating sufficient land to deliver housing need, the NPPF is clear at paragraph 62 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, travellers²⁷, people who rent their homes and people wishing to commission or build their own homes).*

2.10: With specific regard to rural areas, paragraph 79 states: *To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.*

2.11: The proposed site is well placed on the edge of Bracon Ash and in good walkable distance of Mulbarton and the range of facilities that it offers. The site represents an opportunity for a small-scale development to come forward. The site presents a good opportunity to realise the need of niche groups such as the elderly (through bungalow development that would suit the site's edge of settlement character) or self and custom build housing that was previously promoted on the site through the withdrawn application.

NPPF CONSULTATION DRAFT 2022

2.12: The Government has recently completed its consultation on the emerging changes to the NPPF. The draft document shows the direction of travel that the Council intends to take national policy. It is interesting to note that the draft

consultation document places a renewed emphasis *on the overall aim should be to meet as much housing need as possible with an appropriate mix of housing types to meet the needs of communities (paragraph 60).*

- 2.13: National and local policy should therefore look to allocate and deliver housing sites which meet specific housing need; promote greater choice between market housing and affordable housing; and allow small and medium sites to deliver the needs of niche groups such self and custom build.
- 2.14: The subject site represents a sustainable growth option for the village cluster of Bracon Ash and Mulbarton and will help to support existing local services in the village.

3. SITE CONTEXT

- 3.1: The development site is approximately 2.3 hectares in area. It is on the edge of the settlement of Bracon Ash and is approximately 200 metres from the edge of Mulbarton.
- 3.2: The site currently features undeveloped land which has been vacant for some time. The land is not in active agricultural use which is clearly depicted on the Google Earth image at Figure 3.1.
- 3.3: The site is located to the rear of Orchard Nook and Park Nook and would be accessed off Cuckoofield Lane. An extant planning permission exists for the access off Cuckoofield Lane (LPA refs: 2018/0487 and 2021/0573). Works on this access has already commenced and the Council has confirmed that the development of the access is implemented. Any development on the site could utilise this access and this would not result in any further land take.
- 3.4: There are no public right of ways running adjacent to or through the site.
- 3.5: The site is not within a conservation area and there are no listed buildings on or immediately adjoining the site.
- 3.6: The nearest railway stations are Wymondham which is 5 miles away and Norwich which is 7.5 miles away. The nearest bus stop is along Cuckoofield Lane at the entrance to the site.
- 3.7: To the west and south of the site are current areas of development where new dwellings have been approved and are currently being implemented (outlined in green).



Figure 3-1 Site Boundary (red line) Hawkes Lane Development Sites (green line)

- 3.8: If development on our clients land were to come forward there would be a very clear and definite 'rounding off' of Bracon Ash which would not encroach into

the agricultural land that provides the settlement gap with Mulbarton (notwithstanding the access road which has already been permitted). The development site is bookended to its north and south by existing development and therefore new development would not encroach any further east.

- 3.9: There is a group TPO which has been designated on a number of existing trees along the sites eastern boundary. These trees will be protected from future development and help to screen new development on the site. The TPOs provide an opportunity rather than a constraint. This landscaped boundary can be enhanced to create a denser planted edge which will enhance views of the site from the east and also provide biodiversity benefits through new planting.

PLANNING HISTORY

- 3.10: Planning permission was sought in 2019 (LPA ref: 2019/0014) for the erection of 14 dwellings. It was proposed that the dwelling would be for self and custom build to help meet the needs for such sites within South Norfolk. The application was withdrawn in October 2019. The key issues that were raised through this application was the impact on the landscape and the alleged closing of the settlement gap between Bracon Ash and Mulbarton. This is considered further in these representations.
- 3.11: Planning permission was granted in 2018 for the erection of a new access and turning area off Cuckoofield Lane (LPA 2018/0487). This permission establishes the principle of a new access running down the eastern side of The Nook to gain access to the wider site. In 2021 the Council confirmed its implementation by the works undertaken on site. This consent is therefore extant.
- 3.12: Formation of agricultural access track.

Photo A



4. LANDSCAPE MATTERS

- 4.1: In response to the site assessment comments made by the Council in their previous consideration of the land at Cuckoofield Lane, a review of the previously submitted 'Landscape and Visual Issues Statement' (LVIS) by Liz Lake Associates (August 2019) (submitted in support of the withdrawn application) together with South Norfolk Council's Housing and Economic Land Availability Assessment (HELAA) (December 2022) has been carried out.
- 4.2: The Technical Note on Landscape and Visual Matters is attached at Appendix I. It does not seek to provide further detailed assessment on the merits of the previous application, however, it does seek to review and challenge the suitability of the site for development; and where appropriate, challenge the issues raised by the local authority and assess where or not the site can be developed successfully based on a reduced quantum of residential dwellings without establishing significant levels of harm to either the existing landscape character or the visual amenity surrounding the site.
- 4.3: This note should be read in full and comprises a core component of these representations.
- 4.4: In summary:

Having considered the findings of the LVIS and the more recent HELAA which identified several points to address in association with the development of the site, it is considered that the approach to reducing the residential dwellings from fourteen to around seven, will ensure that no adverse harm will be established to the existing landscape character and visual amenity surrounding the site.

Generally, it is considered that the landscape is well connected and settled, therefore the visible presence of residential development within a mature landscape setting is considered commonplace and characteristic of the area. The existing flat topography combined with mature intervening vegetation and the carefully considered placement of new residential development, together with integrating key sections of new green infrastructure, can greatly reduce the intervisibility of any new built form located within the site.

The effects on the existing landscape character of the surrounding area can be minimised through this carefully designed landscape mitigation planting, which should include native trees, shrubs and hedging which will help to augment the residential development within the landscape setting to Bracon Ash and reduce the level of visible built form to both new and existing residential properties once planting is matured. The Site is relatively well screened from the surrounding landscape due to its enclosed nature. This will help to significantly reduce the contextual views of any new development, although publicly accessible receptors are generally limited.

5. SUITABILITY

Sustainability Benefits Associated with the Development of the Site

- 5.1: The provision of new housing in Bracon Ash (and Mulbarton) will provide housing options for local residents who are looking to relocate to or move within the area, as well as additional market housing which will contribute to meeting housing needs.
- 5.2: The proposal presents the opportunity to provide a mix of available housing types and sizes, including appropriate levels of affordable housing, to cater for newly forming households from within the immediate area in addition to families willing to move to Bracon Ash and Mulbarton from elsewhere.
- 5.3: In terms of location, the site is located within walking and cycling distance from Mulbarton (connected by an existing footpath), where a good range of services, goods and facilities would be available to prospective residents. These include a primary/infant school, public house, village hall, veterinary service, doctors surgery, dentist, post office, food stores, restaurants/takeaways, day nursery, hair salon, play areas, retirement home, garage and farm shop, which would all be within walking distance of the application site. The village is also well connected to the surrounding area by public transport, which provides regular services to Norwich City Centre. Given the above it is considered that the site represents a sustainable location for new residential development.
- 5.4: As such the subject site is well placed for people of all ages to be able to safely access services on foot, cycle or other means (such as mobility scooter) along an existing foot pathed route.
- 5.5: The potential introduction of new householders into the area will provide immediate support to the local community groups and clubs and to the immediate wider community.
- 5.6: The construction process associated with the potential development of the site would deliver significant economic benefits. Additional housing in the area will also provide additional spending power and increasing custom to support the local pubs and shops, as well as to the public services and facilities that the residents are likely to make use of in Mulbarton and other cluster villages nearby settlements.
- 5.7: The National Planning Policy Framework also identifies the importance of recognising the character and beauty of the countryside and providing net gains for biodiversity, with development required to contribute to and enhance the natural and local environment.
- 5.8: As part of the site's development there is the opportunity to enhance its ecological interest, from that of an unencumbered, undeveloped piece of land,

through the implementation of a landscaping plan for within public areas of the site and the introduction of new plants and trees by householders.

- 5.9: The site boundaries can be enhanced as part of the development of the site to offer natural screening designed to blend with and reinforce the local vernacular. The development of the site has the potential to bring forward a sensitive design that will respect and preserve the gap between Bracon Ash and Mulbarton without harming the settlement gap.
- 5.10: A number of measures could be incorporated into an extensive masterplan for the subject site with the aim of minimising any visual impacts of development at the site, especially along its eastern boundary whilst also seeking opportunities to enhance local landscape character. This could be achieved through the provision of traditional, sympathetic boundary treatments, native landscape planting, a suitable density mix and the use of local, traditional building materials and features.

MEETING SPECIFIC HOUSING NEED – SELF AND CUSTOM BUILD

- 5.11: The Housing and Planning Act requires local planning authorities to give suitable planning permission in respect of enough serviced plots of land to meet demand for self-build and custom housebuilding. Section 1 of the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) requires all relevant authorities to maintain a register of those wishing to acquire serviced plots of land in the authority's area for self-build and custom housebuilding.
- 5.12: In addition to requiring Local Planning Authorities (LPAs) to understand demand for self-build plots, Central Government also require this demand to be satisfied. Section 23 2(1) of the Self-build and Custom Housebuilding Act 2015 places a duty on relevant bodies to have regard to each self-build and custom housebuilding register that relates to their area when carrying out their planning, housing, land disposal and regeneration functions; this includes citing the registers as a material consideration in decision making and as a source of evidence for plan making. Furthermore, the 2015 Act (as amended by the 2016 Act) establishes a 'duty to grant planning permission', stating that:

"An authority to which this section applies must give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority's area arising in each base period" Chapter 2 Paragraph 9

- 5.13: In order to better understand the extent to which South Norfolk Council are currently satisfying self-build demand, the Council's Housing Enabling and Strategy Officer has been informally contacted prior to submission. As evidenced in Table 5.1 there is significant unmet need to self and custom build housing.

Table 5.1 – Self and Custom Build Register

Base Period	Number Registered	Deadline for Permissions	Permissions Provided
Base Period 1 1 April 2016 – 30 October 2016	112 (permissions required 112)	30 October 2019	112
Base Period 2 31 October 2016 – 30 October 2017	156 (permissions required 97)	30 October 2020	97
Base Period 3 31 October 2017 – 30 October 2018	107 (permissions required 107)	30 October 2021	107
Base Period 4 31 October 2018 – 30 October 2019	109 (permissions required 109)	30 October 2022	109
Base Period 5 31 October 2019 – 30 October 2020	101 (permissions required 101)	30 October 2023	101
Base period 6 31 October 2020 – 30 October 2021	106 (permissions required 106)	30 October 2024	26
Base period 7 31 October 2021 – 30 October 2022	68 (permissions required 68)	30 October 2025	
Base Period 8 31 October 2022 – 30 October 2023	5 to date	30 October 2026	

5.14: It is a requirement for the Local Authority to appropriately allocate sites specifically for self and custom build housing and not simply take these from wider housing allocations. Mechanisms should be put in place on planning permissions which secure them as self and custom build plots to adequately meet the need identified.

5.15: This was stated by the Inspector in an appeal ref. APP/L2630/W/15/3005707 for a proposal for a self-build home outside of a the development boundary within South Norfolk District and the Inspector for the case stated the following in his assessment: "I acknowledge that the Council is a self-build vanguard authority which may augur well for future delivery but the PPG requires plan-making to specifically meet demand from this source. Whilst it may be the case that some opportunities to accommodate local demand for self-build could come forward on individual sites and as part of wider housing allocations, from the evidence before me this is not part of a proactive or positively planned approach for this sector as required by the NPPF at paragraphs 50 and 159 and the PPG. Accordingly, I find that the development plan is silent on self-build housing

proposals and as such proposals should be considered in terms of the balance for decision takers at the second part of paragraph 14 of the NPPF."

- 5.16: As such for the SNVCHA to be deemed 'sound' thorough assessment of the housing need of all groups including self and custom build should be considered and ensure that the need is met. A specific site which can deliver 7 self-build plots will go towards meeting the need.

6. DELIVERABILITY OF THE SITE

Availability

- 6.1: The site is in single ownership of the landowner, Mr Humphrey Berney, who intends to develop the site in the immediate future subject to receiving council support. There are no legal or ownership constraints to bringing the land forward. The site is therefore considered to be available for immediate development.

Suitability

- 6.2: There are no major ecological or environmental designations affecting the land that should preclude it coming forward for development. The site lies on the edge of Bracon Ash but it is considered that the site can be developed without any resultant harm to the gap between Mulbarton, and without causing any harm to any heritage, ecological or landscape designations.
- 6.3: On the basis that the site is free from physical constraints and ecological, environmental or heritage designations, it is clearly developable. There are no access issues nor any abnormal ground conditions affecting the land. The development of the site will offer the opportunity to make a contribution to housing supply in the Village Clusters: new dwellings will contribute to increasing the choice and stock of housing in Bracon Ash and Mulbarton and provide a mixture of housing of varying sizes and tenures.

Achievability

- 6.4: The site covers an area of approximately 1.7 hectares and as it is free of physical constraints and ecology, environmental or heritage designations, it is proposed that the whole site is brought forward for development. It is envisaged that the residential development of the land can contribute to the affordable housing needs of the District.

Deliverability Summary

- 6.5: In light of the above, the land to the south of Cuckoofield Lane is considered to meet the requirements of a deliverable, high quality housing site and should therefore be considered for housing allocation.

7. CONCLUSIONS AND TESTS OF SOUNDNESS

- 7.1: This submission has provided the necessary evidence to demonstrate that the reasons for discounting the site are unjustified and is considered that the land at Cuckoofield Lane represents an excellent option for delivering new housing in rural South Norfolk on a site that can be delivered sustainable and in the short-term without causing harm to the amenity of neighbours or its surroundings landscape.
- 7.2: The site would offer an excellent opportunity for among other things, single-storey development for the elderly or self and custom build housing to help meet the specific needs and aspiration of a mix of people looking to deliver a range of housing types.
- 7.3: We therefore respectfully request that the site be considered positively for a housing allocation to contribute towards the housing requirements in this Village Cluster.

TESTS OF SOUNDNESS

- 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 authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;

RSL comment - As set out within these representations we do not consider that appropriate consideration have been given to the development potential of the land to the south of Cuckoofield Lane. The supporting Technical Note on Landscape Matters clearly demonstrate that development could be brought forward on this site without causing harm on the landscape or on the settlement gap.

There is an identified need for self and custom build housing and the Council has a duty to provide sufficient, specific permissions to meet this need. The proposed site will help to meet this need. Without specific site allocations and consideration of this matter we do not consider the plan to be positive prepared.

- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

RSL comment - The allocation of Cuckoofield Lane for self and custom build housing offers a sustainable and deliverable site. Without such allocations we do not consider the plan to be justified as reasonable alternatives have not been considered.

- 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

RSL comment - The plan is only effective if sites are allocated that meet the identified needs of all community needs. The allocation of Cuckoofield Lane should be reconsidered.

- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

RSL comment - For the plan to be consistent with National Policy full consideration should be given to the allocation of sites that bring forward self and custom build housing, and other housing groups with identified needs.

Until the above considerations are made the Regulation 19 SNVCHA document is unsound.

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WE ARE RURAL

LAND AT CUCKOOFIELD LANE, BRACON ASH

TECHNICAL NOTE – LANDSCAPE AND VISUAL MATTERS

Introduction

A chartered landscape architect with over 20 years of industry experience has carried out a review of landscape and visual matters which formed part of a withdrawn planning application (Ref: 2019/0014) made to South Norfolk Council (January 2019) for the erection of 14 residential dwellings on Land South of Cuckoofield Lane, Bracon Ash, Norfolk.

A review of the previously submitted 'Landscape and Visual Issues Statement' (LVIS) by Liz Lake Associates (August 2019) together with South Norfolk Council's Housing and Economic Land Availability Assessment (HELAA) (December 2022) has been carried out.

This summary does not seek to provide a further detailed assessment of the merits of the previous application, however, it does seek to review and challenge the suitability of the site for development; and where appropriate, challenge the issues raised by the local authority and assess where or not the site can be developed successfully based on a reduced quantum of residential dwellings without establishing significant levels of harm to either the existing landscape character or the visual amenity surrounding the site.

Initial Observations

The site is described within the LVIS as being defined as 'primarily of grassy field, with a strip of agricultural farmland to the east forming an elongated shape running north to south'. Existing arable fields to the north and south of the site ensures a distinct separation is maintained between the settlements of Mulbarton to the east and Bracon Ash to the west. The site is considered distinct in character and contrasts from the open agricultural setting which is defined by the boundary vegetation and the arable field. The site does not form any agricultural function and nor does it appear to form part of the gap between existing settlements based on the presence of mature vegetation defining its boundaries. The site is partially enclosed towards the northern part by mature vegetation which is considered close to transport receptors using Cuckoofield Lane.

The total site is approximately 2.3 hectares in size and is considered gently sloping northwards with an approximate level change of 5m. This level change is not readily apparent, and the landscape appears relatively flat. Existing vegetation defines the majority of the site boundaries. A Tree Preservation Order (SN0518) covers a total of 7no. trees are included as part of the site.

The theoretical approach to low-density residential development combined with careful positioning of properties together with the protection of existing mature vegetation and the

inclusion of new green infrastructure planting can ensure that the site provides the opportunity to reinforce and strengthen the existing landscape characteristics of the settlement edge to Bracon Ash. Existing mature vegetation could be enhanced through extensive new green infrastructure planting which would significantly reduce the visibility of existing built form of Bracon Ash and any future development located within the site.

Housing and Economic Land Availability Assessment (HELAA)

Since the production of the LVIS (August 2019), South Norfolk Council has carried out a HELAA dated December 2022. This is an assessment of land made available for future development and assesses land against a number of set criteria¹ to identify which sites are considered *'suitable, available and achievable for housing and economic development uses over the plan period'*². This process does not allocate land for housing as it identifies those sites which are considered suitable to be considered as part of the Local Plan allocation process.

The site (SN2087REVA) is stated as being greenfield land and was being promoted for new housing as an allocated site with the date of the site assessment noted as being 02.05.2022. No key designations (such as; Special Protection Areas, Nature Reserves, Ancient Woodland, Flood Risk Zone 3b, Scheduled Ancient Monuments, Locally Designated Green Space) cover the site or are located within the site therefore the site was considered for further assessment.

The HELAA goes on to assess the site against a set list of criteria and an allocated red, amber or green rating has been applied to provide an overall HELAA score. Where the 'HELAA Score' indicates, red or amber, a further site assessment is required to consider further detailed information provided by the promoter to provide a final 'Site Score'. The following response has been considered as part of landscape and visual matters considered as 'red', therefore it does not provide a full appraisal of all criteria listed. Matters of disagreement with the findings of the assessment have been highlighted below.

Nationally and Locally Significant Landscapes – The assessment does not identify any nationally important landscapes. It does identify relevant South Norfolk landscape character type (Settled Plateau Farmland) and landscape character area (DI Wymondham Settled Plateau Farmland) although no assessment against the likely impact on these landscape receptors has been made.

Instead, an 'Overall Landscape Assessment' has been made which identifies the HELAA score as being green which, when applying the agreed methodology, has been considered as *'Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting.'* Confusingly, the

¹ Appendix A of the 'Norfolk Housing and Economic Land Availability Assessment (July 2016)' methodology.

² <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

assessment goes on to provide a further Site Score which considers the site as 'red' with the justification that development of the site '*erodes the landscape gap between settlements. It would be very visible in the landscape, particularly when approaching from the east. The inclusion of the additional land for the access accentuates this concern.*' No assessment has been made of the specific impacts upon the landscape receptors (LCT - Settled Plateau Farmland and more specifically the LCA - DI Wymondham Settled Plateau Farmland).

It is considered that the LCA - DI Wymondham Settled Plateau Farmland is the most relevant receptor in this case, based on the published character assessment providing a more local and detailed analysis of the landscape characteristics, sensitivities, vulnerabilities and design considerations most relevant to the site. When reviewing the published character assessment for South Norfolk, the most recent landscape review carried out by Chris Blandford Associates (2012) identifies a number of key characteristics of the area such as:

- *A settled landscape;*
- *Large expanse of flat landform with little variation over long distances with strong open horizons;*
- *Large-scale open arable fields;*
- *Long views from plateau edge;*
- *Poor hedgerows generally which accentuates the openness of the landscape;*
- *Areas of more intact hedgerow network sometimes occur around settlements;*
- *Sparsely wooded but with occasional woodland blocks, sometimes associated with former parkland areas, creating a more wooded character and wooded horizons in parts of this generally open landscape.*

However, the site's relevance to these characteristics are somewhat limited therefore the implied impact of development within the site. The LCA is considered a settled landscape therefore the presence of development within the landscape is clearly a characteristic of the area. Although the adjacent arable fields are considered large, with limited variation in landform, the opportunity to experience long-distance views is very limited due to the slightly rising landform and the wooded horizons.

Development within the site will not impact the extent of long-distance views nor will it significantly alter the existing landform or ability to appreciate the large-scale arable fields which define the landscape separating Mulbarton and Bracon Ash. The lack of hedgerows along Cuckoofield Lane does partly accentuate the openness of the landscape, therefore, is characteristic of the setting of the site, with more intact hedgerows towards the boundaries of settlements. Any new development proposals will need to consider green infrastructure as part of the design process therefore the introduction of new hedgerows, interspersed with hedgerow tree planting will ensure the site can promote relevant landscape characteristics as defined within published guidance.

The landscape character guidance goes on to list out 'Sensitivities and Vulnerabilities':

- The loss of historic settlement pattern as a result of infill development being considered. Development within the site will mirror the currently perceived settlement boundary and any built form experienced within the site will be set against an existing settlement edge. The proposed density within the site is considered to be very low, therefore sufficient space will be made available for significant green infrastructure which can be designed to respect existing landscape characteristics together with reinforcing hedgerows and new tree planting which combine to form well-wooded horizons and reinforce the settlement edge boundary to Bracon Ash.
- Views of development within the early years of the development being established will contain new built form within the site. However, given the mature vegetated setting and the significant amount of space anticipated between buildings, views of built form from say years 15 onwards are likely to be significantly reduced therefore the impact of built form will be largely mitigated. Views of the access road will be clearly visible from the road and cannot be fully mitigated. However, a suitable approach to new characteristic planting will help to successfully augment the activation of the existing access road to transition between agricultural and settlement edge.
- Assuming an appropriate approach to massing, similar to the existing dwellings within Bracon Ash is promoted, no tall structures are considered to break up the skyline therefore the existing tree canopy forming the wider wooded edge to Bracon Ash would be retained. The most notable part of the development within the site will be the use of the existing access road onto Cuckoofield Lane which will require further green infrastructure to better integrate it within the settlement edge. This will result in built form being located further away from the main visual receptors using the road. This development is likely to be set within a landscape, which if designed appropriately, will help to reduce not only the views of new built form, but also help filter views of the existing settlement edge to Bracon Ash, therefore reinforcing key landscape characteristics of mature landscape setting defining settlements.
- Limited loss of hedgerow is likely to occur to facilitate alterations to the existing access track to ensure the track links into the site to the south, although this is not considered to be an 'opening up of the landscape' given the small-scale approach of the development and that the loss of hedgerow would not be clearly discernible, as that part of the track has already been implemented. This loss is considered minor and can be extensively mitigated through new hedgerow planting associated with the new access track which will connect new and existing areas of vegetation and help to screen many of the users accessing the site. The development of the site will

ensure that settlement coalescence will not occur as the majority of the agricultural field defining the separation between Mulbarton and Bracon Ash will be retained. The perceived space between the eastern edge of Bracon Ash and the western edge of Mulbarton is partly narrowed and forms a distinctive characteristic of the wider agricultural field setting. The existing field opens out at approximately 210m from Cuckoofield Lane which provides the perception of a widening agricultural landscape beyond this point, which would be mirrored by the inclusion of the access track reducing the northern section of the field by around and assumed 15m to 20m. This would result in approximately 170m being retained to retain the agricultural setting along with still allowing views to be contained by vegetation located to the field boundaries.

The landscape character guidance finalises the landscape character assessment with a list of development characteristics which are considered to be used to ensure new development can be successfully integrated within the landscape without causing adverse harm to the wider characteristics:

- New development should 'respect the distinctive settlement pattern'. In this case, the existing development edge to Bracon Ash contains new residential development located off Hawkes Lane which establishes a settlement edge boundary. This boundary aligns with the southernmost part of the site, therefore, is considered to retain its distinctive pattern. Development located within the site would be set within the existing mature boundary vegetation defining the edges of the site, which when combined with new planting, would be far less visible than the dwellings off Hawkes Lane.
- The approach to locating new residential development along the edge of existing development ensures that the approach to clustering new and existing development can be promoted. This will help to limit edge of development sprawl and ensures well-planned built form retained the adjacent landscape setting to both the boundaries and the agricultural field.
- The sense of existing openness will be retained as the existing site is not considered to contribute significantly to the openness of the wider landscape setting and conversely, the site itself is considered to form a partly enclosed character due to the presence of existing vegetation. The existing perception of openness is defined by the uninterrupted agricultural field setting and enclosed by the vegetation to its boundary.
- Development within the site would not impact any extensive views of the plateau skyline. The existing visual experience of the landscape from the receptors to

Cuckoofield Lane will still appreciate the agricultural setting although will be terminated by the wooded horizon in the middle distance, limiting any appreciation of much longer distance views. No key views to and from the City of Norwich would be impacted as a result of development within the site.

- The assessment states that maintaining 'strategic gaps' between settlements to avoid coalescence of settlement is important. Further research has concluded that no evidence has been provided specifically relating to the setting of the landscape adjacent to the site therefore the landscape located between Bracon Ash and Mulbarton is considered not as a strategic gap and as an informal 'rural gap' defined by the current extent of the existing settlement. Any new development within the site will not lead to the coalescence of the two settlements. The perception of the rural gap is defined by the current and active agricultural farmland and not by the site itself, therefore this reinforces the suitability for development of the site and also ensures any new development will not lead to settlements merging.
- Historic settlement patterns should be respected and any new development should not seek to redefine settlement boundaries. However, as previously stated, new residential development as accessed from Hawkes Lane, establishes the extent of development which is mirrored by the southern extent of the site and therefore does not seek to extend out into the active agricultural field setting. The northern section of the site will introduce new development and through good design and responding to the local vernacular, can be considered characteristic of the area. However, the extent of the existing site boundary will largely be maintained by the current mature vegetation, ensuring the majority of the agricultural landscape adjacent to the site is maintained. The minor loss of active agricultural landscape to form the access track will not significantly impact the historic settlement pattern of Bracon Ash as the extent of the existing settlement edge will be altered by between 15m to 20m west. This will allow sufficient access to the site and provide space for new green infrastructure and maintain the existing characteristics of the vegetated boundary located towards the edge of the agricultural field setting. Therefore, the extent of the retained gap of around 170m will ensure that the agricultural landscape can still provide its current function.
- The site benefits from being located with the existing perceived edges of settlement to Bracon Ash, even though built form does not exist within it. The mature vegetation along the sites' eastern boundary, defines the current extent of the agricultural landscape separating the existing settlements and forms the existing rural gap. The site itself is not considered to actively contribute to the gap given the level of mature planting defining its eastern boundary.

- The visual impact of development within the site is largely located away from the main visual receptors accessing Cuckoofield Lane, with the exception of access track which will be visible. This track can be considered characteristic of the wider area as the access to Bracon Lodge to the western boundary of Mulbarton establishes an existing precedent and demonstrates how the new access track can positively contribute to the wider landscape and visual characteristics of the area.

Townscape - The assessment considers the site to contribute to backland development which is contrary to the general form and character of the settlement. However, the new access track could be formed in such a way as the existing access track to Bracon Lodge therefore positively contributing to the wider landscape characteristics of hedgerows and tree planting defining the extent of the settlement edge. New residential development accessed off Hawkes Lane defines the extent of development towards the south of the site and ensures that new built form can match the current extent of the built form.

Part 4 of the HELAA assesses the site against a list of site observations which doesn't appear to be covered clearly within the agreed methodology, although does seek that a site assessment is carried out. The following seeks to explore the conclusion of the 'site observations' in more detail where comments made do not seek to support the development of the site:

- *Poorly related to existing settlement, being to the rear of properties fronting The Street in Bracon Ash with no direct connectivity* – The site responds to new residential development accessed off Hawkes Lane to the south. The site also mirrors the boundary of existing residential properties and seeks to retain the majority of the current boundary with the adjacent field. The site is perceived to form an enclosed part of land associated with the existing settlement to Bracon Ash, which is underused and not forming any key functions in maintaining the rural gap between Bracon Ash and Mulbarton.
- *Would significantly erode the landscape gap between Bracon Ash and Mulbarton. The inclusion of additional land to create an acceptable access in highways terms accentuates this by breaking through a hedgerow onto agricultural land, creating a more urbanising effect* – An existing access track has already been implemented and the loss of a small section of hedgerow can easily be mitigated through the planting of new mixed native hedge which will provide wider visual and ecological benefits. As part of the access has already been implemented, there is a need for this track to be extended further south to provide access to the section of the site to the south. The loss of agricultural landscape to achieve this access would be considered insignificant when compared to the existing width of the current gap as part of this

access is already implemented. There is no acknowledgement that the existing gap is already redefined by the implementation of the current access track, therefore the gap would not be significantly eroded and nor could it be if much of the gap is already retained. An existing access track to Bracon Lodge is located on the western edge of Mulbarton and demonstrates how such a track can be successfully integrated and also promoted new green infrastructure which would reinforce the wider landscape characteristics.

- *'There are a number of mature trees on site covered by TPOs'* – The presence of TPO trees within the context of new development should be considered as part of the design response to any site illustrating this type of constraint. The fact the site contains protected trees is considered positive and that new development proposals can seek to successfully integrate these trees and ensure their long-term protection. Siting of buildings and infrastructure can be carried out to avoid the vast majority of adverse impacts on these trees. New development proposals should ensure all buildings are not located in a way that would undermine the health and long-term establishment of these trees. In the event of any infrastructure being located within the existing spread of tree roots, a reduced dig construction method can be promoted as part of the development response to ensure appropriate mitigation measures are put in place.

Part 6 of the HELAA assesses the 'achievability' of the site and in particular, states that a requirement may be required for additional footway improvements to link in with the existing pedestrian footway provision to Bracon Ash. Having briefly assessed the possibility of these enhancements, it appears that any new development should seek to include wider footpath connectivity to improve the wider public benefit and ensure the development can be connected to the wider settlement of Bracon Ash positively.

Summary

Having considered the findings of the LVIS and the more recent HELAA which identified several points to address in association with the development of the site, it is considered that the approach to reducing the residential dwellings from fourteen to around seven, will ensure that no adverse harm will be established to the existing landscape character and visual amenity surrounding the site.

Generally, it is considered that the landscape is well connected and settled, therefore the visible presence of residential development within a mature landscape setting is considered commonplace and characteristic of the area. The existing flat topography combined with mature intervening vegetation and the carefully considered placement of new residential development, together with integrating key sections of new green infrastructure, can greatly reduce the intervisibility of any new built form located within the site.

The effects on the existing landscape character of the surrounding area can be minimised through this carefully designed landscape mitigation planting, which should include native trees, shrubs and hedging which will help to augment the residential development within the landscape setting to Bracon Ash and reduce the level of visible built form to both new and existing residential properties once planting is matured. The site is relatively well-screened from the surrounding landscape due to its enclosed nature. This will help to significantly reduce the contextual views of any new development, although publicly accessible receptors are generally limited.

The visual effects of the new development are predicted not to exceed a moderate magnitude of effect, at their highest, with some of these effects considered to be beneficial in years 15 onwards based on the maturing effects of anticipated new green infrastructure and the existing mature setting of Bracon Ash. The site can ensure that new development can demonstrate the reinforcement and strengthening of existing landscape characteristics such as the establishment of hedgerows and trees which help to define settlement edges. Based on the appropriate mitigation measures being put in place and at year 15 onwards, the development within the site will be well augmented within the landscape and would be considered to respond to an existing settlement edge. The visual effect from the wider study area as defined within the LVIS, from medium to long-distance views, is negligible given the existing screening effects surrounding the site and limited publicly accessible receptors with clear views of the site.

It is considered that the site has the ability to be positively influenced by the surrounding landscape character and can borrow from wider influences of local architectural vernacular, placement of built form and the integration of potential new mitigation planting which should aim to address a reduction in the visibility of the site, provide an increase in the biodiversity net gain and also help successfully augment the site within the wider setting of Bracon Ash.

In summary, it is considered that the reduction of residential dwellings can be accommodated within the site to form an acceptable new residential development for the local area to provide much-needed housing along with promoting a strong landscape character.