

Proposed Residential Development Land south of Haddiscoe Manor Farm

Submission of Representations relating to South Norfolk Village Clusters Housing Allocations Plan - Pre-Submission Draft (Reg 19)

on behalf of Haddiscoe Manor Farm

Ref: PP22/045723

Site Ref: VC HAD1

REPRESENTATIONS TO SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS PLAN – PRE-SUBMISSION DRAFT (REG 19) – MARCH 2023

Land south of A143 Beccles Road, Haddiscoe Manor Farm, Haddiscoe (Site Ref: VC HAD1)

1. Introduction

1.1 On behalf of Haddiscoe Manor Farm, Brown & Co are instructed to submit representations in respect of the Pre-Submission Draft of the South Norfolk Village Clusters Housing Allocations Plan (VCHAP). The Haddiscoe Manor Farm are promoting land to the south of A143 Beccles Road, Haddiscoe – Site Ref: **VC HAD1**.

1.2 The Reg 19 VCHAP has the following draft policy for this site:

Policy VC HAD1: Haddiscoe Manor Farm, Haddiscoe

3.01 hectares of land is allocated for up to 35 dwellings.

The developer of the site will be required to ensure that:

- Vehicular access from the A143, unless otherwise agreed with the Highways Authority and the Local planning Authority;
- Highway works to ensure the continued safe and free-flow of traffic to include the provision of a right turn lane junction and a pedestrian crossing point to enable safe pedestrian access to the existing pedestrian footpath to the north of the A143;
- An area of open space is retained at the north of the site, adjacent to the A143, to minimise the impact of the A143 on the amenities of future residents;
- The site layout, including dwelling orientation, is designed to protect the amenities of future residents in terms of traffic noise;
- Connectivity of the site includes a pedestrian footway within the site to connect the site to the village hall to the east;
- Site layout and design to maintain the views and setting of St Mary's Church, including long views towards the site from A143, through the setting back of development within the site;
- Appropriate landscaping of the site to reflect its sensitive location, including the retention, protection and reinforcement of the existing hedgerows to the east and west boundaries of the site and the introduction of an appropriate boundary to the south of the site, which both visually contains the site and reflects the rural nature of the location;
- Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development;
- Early engagement with Anglian Water regarding the capacity of the receiving WRC and the requisitioning to new sewers and any consequent need to phase the delivery of the site.

1.3 Representations have previously been made during the 'Call for Sites' consultation as part of the Greater Norwich Local Plan (GNLP). The VCHAP has now reached Regulation 19 of its preparation, and the purpose of this consultation relates to the 'Tests of Soundness' and includes legal compliance as set out in the National Planning Policy Framework (Para 35).

1.4 The purpose of this representation is to:

- a) **Support** the continued allocation of the site for residential development and to confirm that the landowners are committed to working with the Council to deliver the aspirations as set out in draft Policy VC HAD1;

- b) **Object** to the specific wording of the proposed policy and propose alternative wording and seek amendments to the text to ensure that the policy is justified and effective; and
- c) **Respond** to other policies of relevance to delivering our proposals, where comment is necessary.

1.5 The VCHAP sets out three objectives:

Objective 1 – Meet housing needs. Deliver housing in accordance with GNLP housing target for the South Norfolk Village Clusters through the allocation of suitable, viable and deliverable development sites housing. (1200 new homes). Provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of life cycle e.g., first time buyers, those seeking family housing and those looking to downsize or move to more suitable accommodation in later life. Provide opportunities for ‘self-builds’ through the extension or amendment of settlement boundaries to allow ‘in-fill’ development in appropriate locations.

Objective 2 – Protecting village communities and support rural services and facilities. Provide opportunities for new housing development in a range of settlements within the village clusters, meeting the needs of a range of occupiers with the potential to support different local services and facilities and infrastructure where justified and appropriate.

Objective 3 – Protect the character of villages and their settings. Ensure that the scale, location and density of housing is well related to the form and character of existing villages, protects the historic environment, including protected landscapes, and ensures appropriate landscaping measures are delivered as part of new development.

1.6 The VCHAP identifies Haddiscoe as forming part of a village cluster that includes Toft Monks, Aldeby, Wheatacre & Burgh St Peter. The cluster is identified as having a range of social and community facilities comprising a primary school, village hall, pub, shop, and recreational facilities.

1.7 We believe that the draft VCHAP is basically sound, as the strategy proposed is essentially justified and effective and provides a range of sites by which growth can come forward. The site offers a very good opportunity to deliver growth in a manner that provides an appropriate to the sustainable objectives of the emerging VCHAP and NPPF. By undertaking this form of development on this site in a sustainable manner it would support the emerging VCHAP.

2. Comments on the proposed strategy

Justified

2.1 The NPPF indicates that, to be justified, a Plan should set an appropriate strategy based on robust and credible evidence, with suitable consideration given to reasonable alternatives. It is considered that the proposed strategy is compatible with the overall purpose of the plan, in particular, the delivery of sustainable development which meets the challenges of climate change and supports ambitious local and national targets for carbon neutrality. The proposed distribution of growth is considered to be basically correct and suitably forward thinking to facilitate the transition to a post-carbon economy, and the emergence of the region as the UK leader in clean growth. In particular, we believe the proposed strategy is considered suitable to deliver beautiful places or spaces.

2.2 The NPPF also seeks to promote sustainable development in rural areas to maintain the vitality of rural communities and allow them to grow and thrive (para 79). We consider, therefore, that the strategy for the VCHAP should focus on delivering a range of opportunities for development that will connect and enhance existing local services and access areas of open space and access to the countryside.

Highway access

2.3 The manner in which a vehicular access is to be provided from the A143 is already referred to in the proposed policy for the site stating:

- Vehicular access from the A143, unless otherwise agreed with the Highways Authority and the Local planning Authority;
- Highway works to ensure the continued safe and free-flow of traffic to include the provision of a right turn lane junction and a pedestrian crossing point to enable safe pedestrian access to the existing pedestrian footpath to the north of the A143;

We have no objections to these requirements. The proposed access would be constructed to an adoptable standard which can be easily accommodated as part of the development. We don't believe that there is any technical objection to form an access to the intended site and the landowner has control of all the land necessary to construct it.

Utilities

2.4 We do not believe that there are any constraints to the provision of utilities to the site. The foul drainage would need to be undertaken by private treatment works. We do not believe that there are any capacity issues with provision of water or electricity. There is, therefore, no technical objection to this site coming forward in terms of the provision of utilities.

Access to services/Facilities

2.5 The site is accessible to a range of facilities with the Toft Monks Primary School being 1.3km via a footway. In addition, Haddiscoe village hall and recreation ground is 200metres to the east and The Haddiscoe Tavern some 500 metres from the site.

2.6 There are 2 bus routes and 16 bus stops in the village with the 580 bus service running between Bungay and Great Yarmouth. There are bus stops at the Village Hall and Rectory Road. In addition, Haddiscoe has a railway station at Haddiscoe Dam approximately 3.3kms (2mls) from the proposed site.

2.7 Haddiscoe is located 22.4 km (9.7mls) from Great Yarmouth to the north, and approximately 9.6kms (6 mls) from the market town of Beccles, which provides a range of higher order services including retail, leisure and social facilities, as well as employment.

2.8 Accordingly, it is considered that the proposal development would benefit from good access to local services and would accord with local and national planning policies which indicate that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Given their accessibility, existing local businesses and services would be likely to derive support from the development due to the addition to the local economy of the spending power of new residents. In these respects, the proposal would support the social and economic dimensions of sustainability as defined in the NPPF.

Heritage assets

2.9 The site is approximately 180 metres to the east of the Grade I Listed Church of St Mary. Whilst there are direct sightlines towards the church from the site, we believe that any proposed development can be set back to preserve the long range view of the church and the openness of the setting of the church. This is referred to in the draft policy.

Landscape/Local Character

2.10 The landscape generally consists of large open arable fields defined by countryside hedging with belts and areas of woodland. There are mature individual trees along the boundaries of the

site which will be retained as part of the proposed development. The proposed site is designated 'Tributary Farmland with Parkland' within the Councils Landscape Character Assessment 2012. We believe that the proposed development can be designed to blend into the landscape .

Flooding

2.11 The site falls entirely within Flood Risk Zone 1. As such, the site is at the lowest risk of flooding. However, further technical work, including a site-specific flood risk assessment, would be commissioned with any forthcoming planning application to demonstrate that the proposed development would not be at risk of flooding or be likely to result in an increased flood risk elsewhere in the locality. The attached supplementary information demonstrates the site's minimal risk of flooding.

Ecology

2.12 The site is approximately 500metres (0.3 miles) from the Broads Authority executive boundary to the east, and the Stanley and Alder Carr, Aldeby SSSI site is some 3.8kms (2.36 miles) to the south. We do not believe that the proposals will materially affect these designations by virtue of the distance and the intervening vegetation and buildings.

Effective

2.13 In order to be considered effective, the NPPF states that the proposed strategy should be deliverable over the plan period. We believe with a suitably designed scheme, which recognises the constraints of the site could be delivered in such a way as to minimise landscape harm with the ecological and recreational benefits it potentially would bring. The site is deliverable as it is available now and has a realistic prospect of delivering housing within five years.

2.14 We are in discussions with potential local builder/developers who is keen to deliver residential development and construct this site. There are no significant physical constraints to the development of the site, and we remain confident that this site can deliver housing units early in the lifetime of the Plan.

2.15 Demonstrating deliverability is fundamental to achieving a sustainable, well-planned development. As has been evidenced with Local Plans across the country, proposed allocations, particularly those for large-scale housing, can falter where it is considered that sufficient work has not been undertaken to robustly demonstrate their viability or deliverability. In order to provide an effective strategy that would deliver the requisite housing within the plan period to meet local needs, it is considered necessary to provide a range of sites to create a number of outlets for growth to ensure growth is achieved through the Plan period.

2.16 The proposal site is within a single landownership, as a result there would be no disputes regarding which elements of the development come forward first, no time-consuming discussions around equalisation, and no negotiations over the distribution of infrastructure cost, all of which can cause significant delay and even permanently stall projects.

3. Proposed amendments to Policy

3.1 We wish to see the following changes to the wording of the policy (for ease of reference the replacement wording is highlighted in yellow below) :

Policy VC HAD1:Haddiscoe Manor Farm, Haddiscoe

3.01 hectares of land is allocated for **at least** 35 dwellings.

The developer of the site will be required to ensure that:

- Vehicular access from the A143, unless otherwise agreed with the Highways Authority and the Local planning Authority;
- Highway works to ensure the continued safe and free-flow of traffic to include the provision of a right turn lane junction and a pedestrian crossing point to enable safe pedestrian access to the existing pedestrian footpath to the north of the A143;
- An area of open space is retained at the north of the site, adjacent to the A143, to minimise the impact of the A143 on the amenities of future residents;
- The site layout, including dwelling orientation, is designed to protect the amenities of future residents in terms of traffic noise;
- Connectivity of the site includes a pedestrian footway within the site to connect the site to the village hall to the east;
- Site layout and design to maintain the views and setting of St Mary's Church, including long views towards the site from A143, through the setting back of development within the site;
- Appropriate landscaping of the site to reflect its sensitive location, including the retention, protection and reinforcement of the existing hedgerows to the east and west boundaries of the site and the introduction of an appropriate boundary to the south of the site, which both visually contains the site and reflects the rural nature of the location;
- Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development;
- Early engagement with Anglian Water regarding the capacity of the receiving WRC and the requisitioning to new sewers and any consequent need to phase the delivery of the site.

3.2 We are seeking amendments to the policy to ensure the potential number of units on the site is realised. Having undertaken some initial work on the site, we believe that the site is capable of delivering at least 35 units. Attached to these representations is a concept layout with opportunities and constraints illustrating how development on the site could come forward. This is in accordance with paragraph 119 of the NPPF which seeks to ensure the effective use of land in meeting the need for homes and other uses.

4. Conclusions

4.1 The VCHAP in its current form is considered to be sound as the strategy adequately delivers on the overall purpose of the plan in providing a range of development, in particular addressing the challenges of climate change and supporting ambitious local and national targets for carbon neutrality. We would support the distribution of growth insofar as it seeks to support the rural communities and sustain them for the foreseeable future and facilitate the transition to a post-carbon economy or to create truly beautiful places or spaces. The draft VCHAP recognises the need to deal with the challenges of climate change and carbon neutrality and adapt accordingly, and this is supported.

4.2 The proposed development would make a positive contribution to the provision of housing in the area. The proposal would also add to the range of housing sites available in the locality, providing flexibility and a wider choice of development opportunities to the market, and thus strengthening the local supply of housing land. By providing sufficient land of the right type in the right place to support growth, the development would address the economic dimension of sustainable development, as defined in the NPPF.

4.3 We consider this form of development that is part of the draft allocation for this village, led by the green credentials of the locality would result in tangible benefits for the community and provide housing in a holistic and sustainable way in order to create a vibrant and resilient community and support the move to a post-carbon economy. Government has recognised the role that residential development can have in achieving sustainability and creating communities, where there is no choice between quality and quantity and green spaces amount to more than token verges and squares.

4.4 As already noted in previous submissions, no significant constraints have been identified to date which would be likely to delay or impede the development of the site for housing. The site is in a single ownership with agreement from the adjacent landowner to provide access, and no further land is needed to enable the land to be brought forward for development. The land is currently available for development and so, subject to approval being given, could deliver housing in the short term.

4.5 We are confident that the site will be taken up by a respected local developer, who are currently delivering schemes in a number of locations in the area. We are keen to develop this site as soon as possible in order to meet local needs and demand, should the site be allocated then the development could be delivered quickly.