

# **GNLP Regulation 18 Consultation Response**

## **GNLP0422 - Land at Lodge Farm, Horsford**

On behalf of our client, Mrs Rachel Foley, we strongly recommend that Land at Lodge Farm, Horsford (GNLP0422) is allocated for residential led development, along with the conversion of existing barns on the site for retail, residential and leisure uses. The site is considered to be entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2036.

In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', set out in footnote 1 to paragraph 47, the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable.

The site was initially promoted through Regulation 18 of the Greater Norwich Local Plan Call for Sites, with the suitability of the site being assessed in the Housing and Economic Land Availability Assessment (HELAA) (2017). This representation intends to revise the red line boundary which was submitted in the Call for Sites submission, in order to create a more logical extension to the settlement, and to include the existing barns for conversion, which lie within the revised site boundary. The revised site area is: 2.346ha.

Whilst the assessment determined the site to be 'suitable', it raised some site-specific constraints. These points are addressed in further detail below.

### **Assessment of Deliverability**

#### ***Suitable***

Horsford is identified in the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) (2011) as a Service Village. Service Villages are identified as locations which can support small-scale housing growth, subject to form and character considerations.

The Greater Norwich Local Plan Regulation 18 Consultation document states that in identifying sites to accommodate the additional 7,200 homes required during the period up to 2036, consideration will be given a range of settlements, including Service Villages (of which Horsford is one), which will need to accommodate a minimum level of growth of 1,000 units, irrespective of which of the six growth options is identified. On this basis, Horsford is considered to be a location that is, in principle, a suitable location for additional development.

The Greater Norwich Local Plan (GNLP) Regulation 18 Consultation document outlines how the GNLP will help to drive economic growth, to support the delivery of 45,000 additional jobs by 2036, enable growth in the economy, and support a thriving rural economy. The document acknowledges that there is significant potential for economic growth in the Greater Norwich area. Therefore, the conversion of barns at Lodge Farm for retail and leisure uses, would help to meet the delivery of additional jobs by 2036.

The site lies to the east of Horsford, and is situated outside but immediately adjacent to the Settlement Boundary. Development on the site would form a logical extension to the Settlement Boundary, in providing residential, retail and leisure uses, in a site which is well related to the centre of Horsford. The development

of the site would be representative of the way in which Horsford has evolved as a village, providing a logical and considerate extension to the existing Settlement Boundary; in a similar manner to the development by David Wilson Homes to the north of Horsford (application reference: 20130547).

The site falls within a highly sustainable location. Horsford benefits from a variety of existing services, in particular: a Post Office; Bakery; Primary School (split between two sites: one on Holt Road, the other on Mill Lane); Village Hall; Pharmacy; Co-op; and a pub. The site also benefits from being well connected by an existing network of public footpaths (which provide access to the facilities on offer in the village, approximately 0.3 miles from the site), and by the existing road network. The B1149 provides access to the Northern Distributor Road, and to the A140, which provides direct access into Norwich (approximately 5.6 miles away). Norwich provides a wealth of employment opportunities, services and facilities. On this basis, development on the site for both residential dwellings, retail and leisure uses would be well related to Horsford and its existing services, demonstrating sustainable development.

The Horsford Neighbourhood Plan Submission Draft (2017) advocates a variety of aspirations for Horsford, in particular: the need for community meeting space; new outdoor recreation space; provision of additional education and health care facilities; provision of mixed housing; enhancement of walkability and bike ability in the community; new business which fits in with the surroundings; and a new or expanded supermarket. Development on this site could help deliver the aspirations and objectives of the Neighbourhood Plan.

In terms of more detailed site-specific considerations, the HELAA identifies the site as a suitable location for residential development. It confirms through a 'Green' rating, that there are no constraints or impacts anticipated which would prevent development on the site, in relation to Accessibility to Services; Utilities Capacity; Utilities Infrastructure; Contamination and Ground Stability; Flood Risk; Market Attractiveness; Significant Landscapes; Biodiversity and Geodiversity; Historic Environment; Open Space and Green Infrastructure; Transport and Roads; and, Compatibility with Neighbouring Uses. Whereas, the following site-specific constraints are rated 'Amber': Access and Townscape. These are discussed in further detail, below.

### *Access*

In support of this representation, Orari Limited have produced an Access Appraisal for the site, which details how access to the site could be provided to serve the proposed development. The appraisal outlines that the existing Lodge Farm concrete access road will need to be improved in line with NCC 'Access Road' standards and that a minimum carriageway of 4.8m and 1.8m footway will need to be provided. The existing access road will also need to be extended into the new development.

The work undertaken by Orari Limited has demonstrate that these works, and the required visibility splays of 2.4m x 43m, can be achieved by widening Lodge Farm / Holt Road junction. This will require the use of land within the public highway and land to the south of the access road – as it falls within the gardens of Lodge Farmhouse, which is in the client's ownership. Therefore, it is demonstrated that sufficient access to the site can be achieved.

### *Townscapes*

The site lies to the east of Horsford. Horsford contains two significant heritage assets which hold important value in regards to the character of the local townscape: Horsford Parish Church of All Saints, a Grade II\* Listed building (approximately 722m from the site), and Horsford Castle, a Scheduled Ancient Monument (approximately 1.17km from the site). Considering the distance of the site from these assets, it is considered that development on the site will not impinge on the setting and character of the heritage assets on the local townscape.

The development can be designed in a way which respects the form and character of the local vernacular, and the site's relationship to the surrounding setting. The site lies within an enclosed area of 4 fields, which are surrounded by relatively dense mature trees and vegetation. Therefore, views of the site are obscured from the wider townscape, particularly from the north, east and south of the site. Consequently, development on the site will impose little impact on the character of the surrounding townscape. The HELAA document raises questions over whether the site would impinge on far-reaching views of the church from the north. The land situated between the church and the site is densely populated by mature trees and vegetation, and the wider countryside is relatively densely bordered by mature trees, which obscure any views of the church from the surrounding townscape. On this basis, it can be demonstrated that development on the site will not affect views of the church, nor impinge on the setting of the surrounding townscape.

### ***Available***

The site, in its entirety, is owned and occupied by Rachel Foley.

It is anticipated that development on the site would be available and developable immediately.

### ***Achievable***

Based on the suitability assessment above, there are no site-specific constraints which could threaten the delivery of residential development on the site. Therefore, residential development on the site is deemed to be entirely achievable.

### ***Viable***

Development of the site for residential purposes is considered viable, taking into consideration the various policy requirements in relation to matters such as affordable housing provision and CIL contributions. Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary.

### ***Summary***

As outlined above, the site is suitable, available, achievable and viable, and is therefore developable. Development in this location would represent sustainable development, as defined within the National Planning Policy Framework. Horsford, as a Key Service Village, is identified as a suitable and sustainable location which can accommodate additional development and, as such, is likely to be identified as a location to accommodate some of the additional dwellings required during the period to 2036. The foregoing text demonstrates that this specific site is a suitable location for further development.

Economically, the site represents the right land in the right place at the right time. Residential development, retail and leisure development on the site would help to support and sustain the local economy in Horsford, and would support the long-term planned economic growth of the Greater Norwich Area. As well as providing jobs during construction, the development would provide high-quality and desirable homes within easy reach of key employment areas, notably Norwich and the Main Towns.

Socially, development on the site is envisaged to create a sustainable community, through providing residential dwellings, and converting existing barns for retail and leisure uses. The conversion of the existing barns for retail and leisure uses will benefit the local economy, through enhancing the level of local services and facilities on offer in Horsford. A mixture of dwelling types, sizes and tenures will be provided, informed by local housing need, and CIL payments made will help to provide and enhance the local facilities on offer in Horsford, as identified as key aspirations in the Horsford Neighbourhood Plan Submission Draft.

Environmentally, the site benefits from falling within a highly sustainable location, benefitting from a range of local services, which are within walking distance of the site. Leading on from this, Horsford also benefits from existing bus services, which provide relatively frequent services into Norwich City Centre, Hellesdon,

Aylsham and Holt. This provides residents the option to utilise sustainable transport methods, as well as connecting to a variety of employment opportunities, particularly to those on offer in Norwich City Centre. In regard to the environment, the site holds limited ecological value due to being intensively farmed, and therefore development on the site would not impose any environment impacts.

On this basis, the site should be taken forward as an allocation for residential development in the emerging Local Plan.