

## Representations as to Site GNLP1054 Unreasonable Sites

These representations have been produced by Cheffins Planning on behalf of Bright Future Developments Newton St Faith Ltd in relation to the decision by the Greater Norwich Development Plan team to consider that "Land off Manor Road, Newton St Faith - Ref GNLP1054 -Residential development extending the neighbouring allocation HNF1" is an unacceptable option for allocation. The justification for the rejection of this site was on the basis that "*The site is reasonably well related to the existing built form and character of the village, adjacent to the existing HNF1 allocation, with a safe pedestrian route to St Faiths Primary School. There is a section of surface water flood risk. The site is not considered to be reasonable for allocation due to landscape character and neighbour amenity issues. Current outline planning application 20181525 is under appeal against non-determination*".

It is welcomed that the Council consider that the site is well related to the existing built form and character of the village. It is important to note that the allocation HNF1 is now subject to an extant planning application (20182043 Full application) for the demolition of a dwelling and the erection of 69 Dwellings and Associated Infrastructure and Landscaping at Land off Manor Road, Newton St Faiths, NR10 3LG. This application was approved on the 19<sup>th</sup> December 2019 and the applicants Lovells are in the process of undertaking the necessary works prior to commencing development. As a result of the above, my client's land represents an infill site between existing development. The Lovells scheme is also committed to providing a footpath to the south to St Faith's Primary School and the landowners of site GNLP1054 have stated in a recent planning appeal and via a current application that they are committed to extending the pedestrian link on Manor Road. This will extend the upgraded footpath to the north from the Lovells site to site GNLP1054. This clearly demonstrates that a viable option to the private car exists to access local facilities.

The comments made regarding flood risk are incorrect and whilst the appeal against non-determination of the application 20181525 was dismissed, this was primarily on the impact of development on listed buildings and not on the basis of flood risk. The surface water strategy was also endorsed by the Lead Local Flood Authority in relation to the application 20181525. The Council also raised issues regarding the impact of the proposed development on the amenity of the dwellings either side of the access and the impact on residential amenity from overlooking. The Inspector in his decision letter confirmed that the proposal would not have a significant/adverse effect on residential amenity. Therefore, the claims regarding harm to residential amenity are unfounded and were not considered to be significant.

The access to the site has been confirmed as acceptable by the Local Highway Authority.

In terms of landscaping the site is bordered on its northern, eastern and southern boundaries by mature hedgerows and trees. These hedgerows also allow the site to be separated into different segments. In relation to the appeal the main issues associated with its dismissal related to the impact of the proposed development on the setting of the Grade II Listed Buildings at Middle Farmhouse and the granary to the east of the site. It was also noted that this site intruded further to the east than the adjacent Lovells scheme, bringing this site closer to Middle Farmhouse and having a greater landscape impact.

As a consequence of the above, an application (20191920) for 16 dwellings has been submitted on the basis of a rural exception site. This application has sought to remove the most easterly field from the scheme and development encroaches no further to the east than the adjacent Lovells scheme. The Conservation Officer in commenting on this application has now confirmed that there are now no adverse impacts on Middle Farmhouse or the landscape.

It should also be noted that the development of this site would still be viable with a compliant level of 33% affordable housing. This provision would help to correct the potential shortfall in affordable housing in Horsham and Newton St Faith's, with the Lovell's claiming that their site would only be viable with 10% affordable housing. The level of affordable housing which this site could deliver is an important benefit which would arise from the allocation of this site. The viability of development has been confirmed by the assessments which have accompanied the previous and current applications at this site.

As a consequence of the appeal decision above, it is accepted that the eastern part of the site is less suitable for development and the most easterly fields should be removed from any assessment. As a result the capacity of the site is circa 25-30 dwellings. The reduced density and site area will still allow surface water drainage to be attenuated on site. It is also clear that this site will represent a logical extension to the Lovells scheme and infill a gap between the existing and proposed development. Furthermore, it is evident that the constraints identified above have been addressed and when considered against the stated benefits, it is clear that the site should be reassessed and considered for allocation. In fact, it is by far a superior and fitting site for the area than the proposed GNL0125

In addition, as the construction of the homes at Lovells site, allocated by virtue of Policy HNF1, is imminent, in reality only 20-30 homes are proposed in the entirety of the plan period within Horsham and Newton St Faiths from 2020-2035. This is an extremely low figure and fails to recognise the relationship of Horsham and Newton St Faiths to Norwich. In addition, there is clearly demand for development in this area and my client has already received expressions of interest from developers. The site GNL0154 is clearly available and deliverable early on in the plan period.

All reports and access approved by Highways and FRA approved by LLFA and this site is ready to be developed.

In reviewing all of the documents relating to the allocation of development sites in Horsham and Newton St Faiths it is apparent that there are inconsistencies in the commentary relating to the rejection of this site when compared with the HELAA comparison table. This table confirms that the site is not at risk of flooding and whilst the Historic Environment is detailed as amber, if the most easterly field is deleted then the score should be green.

There are concerns as to how the preferred site for allocation has been identified with GNL0125 having considerably more amber scores than GNL0154. Whilst it is acknowledged that the intention is now to only allocate the site for 20-30 homes, the scoring applied should reflect this. In addition, in relation to the assessment of GNL0154 the assessment should reflect the up to date position, where the Inspector in determining the appeal did not consider either the access arrangements or impact on amenity as issues. Whilst, there were some concerns about the landscape and heritage impacts these can be readily addressed by reducing the size of the site.

The re-evaluation of the site GNL0154 is clearly an option open to the Council, in that the site GNL0125 was being promoted for 14.85ha (circa 400 dwellings) and has now been reduced to 1.44ha (circa 20-30 dwellings). The approach being taken by the Council appears to demonstrate inconsistencies in the way that sites have been considered. In addition, from an analysis of the submitted documentation it is impossible to understand how a site with so many constraints has been selected. Whereas a more suitable site which has fewer constraints has been rejected. The purported constraints identified by the Council have been contradicted by an appeal inspector and statutory consultees.

The comments regarding GNLPO125 having good access to services are somewhat perverse with the preferred site being a much greater distance from the Primary School and the community building than GNLPO1054. It is also clear that the GNLPO1054 can combine with HNF1 to produce an upgraded pedestrian and cycle route to the primary school. Finally, the site GNLPO1054 unquestionably will reflect infill whereas the preferred site represents an intrusion into the open countryside, with little or no defensible boundaries to development. It is clear that the site promoters are seeking a much larger allocation and the allocation of the site GNLPO125 will set a precedent for further growth in this location.

In view of the inconsistencies detailed above it is suggested that a full review of the sites within Horsham and Newton St Faiths is undertaken to ensure that a proper assessment is made of the constraints and opportunities associated with each site. It will also allow smaller size sites to be considered as has occurred in relation to GNLPO125. As the information stands there are clearly questions as to whether the plan is sound and whether the basis for selecting the preferred site has been based on the most up to date evidence.