
Proposed Residential Development On land at Fellowes Road, Honingham

Submission of Representations relating to Regulation 18 Consultation (Stage C), Greater Norwich Local Plan

on behalf of Mr I Alston and William Young (Dereham) Ltd.

Ref: 028567

GNDP Site ref: GNLPO411

REPRESENTATIONS TO REGULATION 18 CONSULTATION ON THE GREATER NORWICH LOCAL PLAN MARCH 2020

Greater Norwich Local Plan: Land at Fellowes Road, Honingham [Site Ref: GNLPO411]

Introduction

1. The following comments are submitted as an objection to the classification of land at Fellowes Road, Honingham (ref GNLPO411) as an 'unreasonable alternative', and as support of its potential as an allocation or housing.
2. Representations for this site were submitted to the previous Reg 18 Consultations for the Draft Local Plan in March and December 2018.
3. The following Representations reiterate that information submitted as part of the previous consultation in support of the site, as well as providing comments on the current proposed status of the land as an 'unreasonable alternative'.

Comments on the site

4. Honingham is a small village south of the A47 Southern Bypass, located within the Broadland District. The parish is largely rural in character, however the designated Food Enterprise Zone is located to the south west of the Parish. Within this area 16.5ha is designated as the Food Enterprise Park and benefits from a Local Development Order which permits the development of food related industries, within specified criteria, without the need for planning permission. This area forms a designated Strategic Employment Area, and development is already underway.
5. Within the Site Assessment Booklets Honingham is considered in tandem with Easton, as part of a cluster. Easton is defined as an Urban Fringe Settlement and major growth location, whilst it is noted within the booklet that "*any sites preferred for allocation in Honingham will be counted towards the total for Broadland village clusters*".
6. Policy 7.4 of the Draft Local Plan 'Cluster Villages' sets out the remaining planned housing growth, amounting to 4024 homes, around 9% of the total for Greater Norwich in the plan period. In Broadland the GNLPSites Plan allocates sites to meet the requirement for up to 480 more homes, in addition to the 995 homes already committed in the village clusters in Broadland. These clusters are based around primary school catchments, informed by the school capacity or ability to grow, along with the availability of other accessible services, defined as the 'social capacity' of a cluster. The Plan confirms that the sites with the fewest constraints have helped to provide the indicative view on the potential amount of growth in specific clusters.
7. The Draft Plan identifies one site as a preferred allocation in Honingham (GNLPO276 North of Dereham Road) for the delivery of 12no. dwellings. One 'Reasonable Alternative' is identified, a strategic site for a new settlement, and two sites considered as 'Unreasonable Alternatives'. The site subject of these Representations forms one of those considered 'unreasonable'.
8. We object to the preferred site identified and do not agree this is the best option to deliver additional housing within Honingham. It is considered that the Land at Fellowes Road would offer a more suitable location for housing in closer proximity to bus stops, with better connectivity and without significant adverse landscape impacts, indeed the subject site scores slightly higher on the Sustainability Appraisal than the site preferred for allocation.
9. The assessment contained within the settlement booklet indicates that the site was considered unreasonable due to the distance to the primary school in Easton, and the narrow access arrangements to Fellowes Road with lack of alternatives due to Mill Lane being sub-standard.

10. The site lays to the north of Fellowes Road, to the rear of a number of single storey and two storey dwellings. The existing field access is narrow, approximately 3m wide, and therefore not suitable to support residential development. However, this would be enhanced as part of any development, through the acquisition and alteration of No. 16 Fellowes Road, thus allowing for delivery of wider access. The landowner has an agreement in place with the owner of No. 16 which would facilitate this in a timely fashion should the site become an allocation. Suitable visibility would be achieved in either direction so as to ensure the safety of pedestrians and drivers alike.

11. Additionally, the site is located adjacent to Mill Lane, which is a designated Public Right of Way. Residential development of the site could provide pedestrian links directly to Mill Lane, improving the connectivity of the site. As part of any development improvements to the surface of Mill Lane could be delivered to encourage walking and cycling. Improvements would link to the existing footpath at The Street, directly north west of the mouth of Mill Lane. Provision of pedestrian links through the site would further enhance the permeability of the wider village, providing a safe walking route between Fellowes Road and the village centre. Indeed, it is noted within the Sustainability Appraisal that the site is within the target distance of the Mattishall Road bus stops, and is well connected to the existing footpath network.

12. It is considered that these arrangements would represent preferable access arrangements to those required for the Dereham Road site, which is located atop a bank, on a bend, on the approach to the village and raises concerns regarding safety. It is not considered that the Dereham Road site could deliver suitable footpath links as land required to deliver a connection to the existing footpath falls outside of the Highway Boundary. As a result of the enhanced vehicular access and the potential for enhanced footpath links the Land north of Fellowes Road could provide suitable connections so as to facilitate safe access for school children, through ample potential for school bus connections.

13. The site is further well located to the committed Highways England improvements to the A47, which will enhance walking and cycling in the wider area.

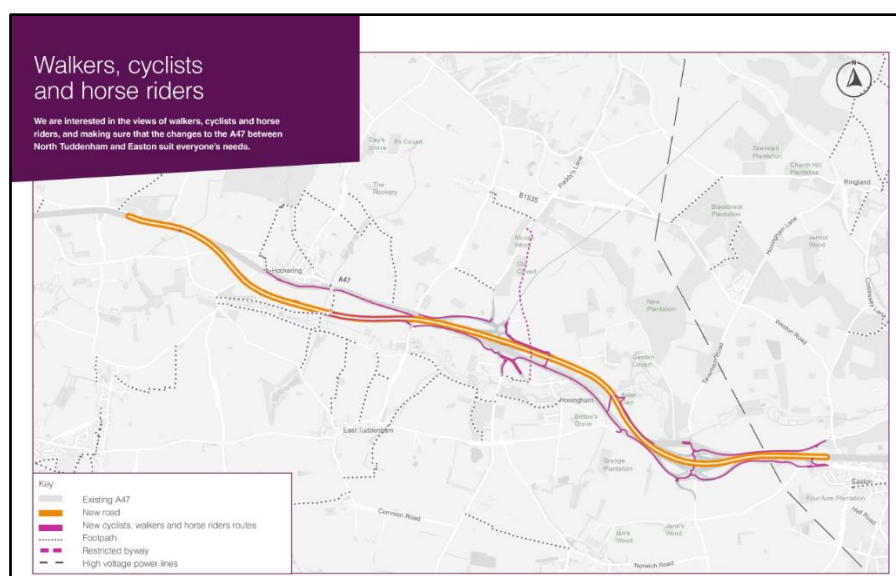


Figure 1: Pedestrian, cycling and Equestrian improvements proposed through A47 improvements (Source: Highways England, A47 North Tuddenham to Easton Public Consultation: Have Your Say February 2020)

14. The site is located within the Weston Green tributary Farmland (D2) Landscape Character Area, noted for its predominantly rural character and appearance, with mature woodland blocks and characteristic views across the peaceful landscape.

15. The site is well located within the main built form of Honingham, bounded by residential dwellings to the north, east and south and a further dwelling located further to the west. An established hedge and tree belt envelops the site, enclosing it from long views in and out. Therefore, development at the site would not have a significant adverse impact upon the landscape character. Nor would development have a significant adverse impact upon residential amenity of neighbouring properties, the size of the site and scale of proposed development would allow for suitable distance of separation, additional planting would provide an enhanced buffer. Development at the site would be high quality, utilising vernacular materials, and designed to mitigate for climate change and to respect neighbouring dwellings and the character of Honingham.

16. It is considered that this site would represent the preferred option for development in terms of landscape impacts due to the enclosure of the site and character of surrounding development. In contrast, the Dereham Road site forms part of a large open field which sits higher than the surrounding land. It is noted within the Sustainability Assessment that development at the Dereham Road site *“would be likely to significantly alter the views across the landscape from nearby settlements”*. Additionally, dwellings in that location are considered more dispersed, contributing to the rural character and transition from village centre to surrounding open countryside.

17. The site lays wholly within Flood Zone 1 and is therefore considered at low risk of flooding, not part of the site it indicated as being at risk from surface water flooding. Development of the site would incorporate sustainable drainage measures, and permeable surfaces where possible, to ensure that flood risk would not be increased in any other location as a result of development. Water conservation measures would be incorporated throughout any development.

18. Whilst the site is bound by existing hedging and trees, the ecological value of the site is considered to be low by virtue of the agricultural use. Residential development would offer the opportunity to enhance the ecological value of the site through additional planting, incorporating mixed native species, and the inclusion of bird and bat boxes. Indeed, research has indicated that residential gardens support a wide range of animals and insects.

19. It is not considered that there are any infrastructure constraints at the site which would impede delivery.

Comments on the Draft Plan

20. It is considered that delivery of residential development at the site would support the objectives of, and be compatible with the strategy of, the draft Local Plan through:

- Support for a post-carbon economy, providing support for the nearby Food Enterprise Park through the provision of high quality residential development that would facilitate the retention of the skilled workforce;
- Delivery of housing which will help to support the vibrancy of Honingham and sustain a healthy community;
- Well designed, high quality homes that meet needs and use land efficiently;
- Enhanced pedestrian connectivity;
- Timely delivery towards the beginning of the Plan period; and
- Protection of the natural, built and historic environment.

Delivery of development

21. No significant infrastructure 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 and an agreement is in place to deliver an enhanced access, 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.

22. The proposed development would make a positive contribution to the supply of high quality housing in the area and could facilitate improvements to local pedestrian connections and permeability of Honingham. 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.