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MDPC Ltd

Attention: Mr Malcolm Dixon
Wolseley House
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NR32 2HD

Application Number

20181408

Dear Mr Dixon

Description of Development Construction of 47 Dwellings, Access & Associated Open Space (Outline)
Site Address Land at Holt Road, Horsford

Further to your letter dated 5th September 2019 and my response to you dated 22nd January 2020, I have now provided you with a more comprehensive response to the points raised.

The main issue to be taken into consideration in the determination of this application is an assessment of the proposal against the policies of the development plan and the National Planning Policy Framework (NPPF) and whether there are any other material considerations.

Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. This point is reinforced by paragraph 11 of the NPPF, which itself is a material consideration.

The application site is located outside of the settlement boundary as defined by the development plan and in planning terms it is in the countryside. Policy GC2 of the Development Management DPD (DM DPD) directs new development to within the settlement limits. It goes on to state that development outside of settlement limits, which does not result in any significant adverse impact will be permitted where it accords with a specific allocation and/or policy of the development plan.

The northern boundary of the application site directly abuts the edge of the defined settlement. Horsford is identified as a service village by Policy 15 of the Joint Core Strategy (JCS), which states that land will be allocated for small-scale housing development for each service village. The policy relates to allocations rather than development and the application site and number of proposed dwellings in this case are not considered small-scale.

Policy 15 of the JCS also identifies Horsford as one of the service villages that may be appropriate for additional development to help deliver smaller sites in the Norwich Policy Area (NPA) as set out by Policy 9 of the JCS. In the Broadland part of the NPA, allocation of smaller sites to deliver 2000 dwellings will be made in accordance with the settlement hierarchy. Policy 9 explicitly refers to allocations.

Consideration must also be given to the supply of land for housing in the Greater Norwich Area. The most recent Greater Norwich statement on five-year housing land supply was published as



Appendix A of the Annual Monitoring Report (AMR) 2017-2018. This statement shows that there is currently 6.54 years housing land supply within the Greater Norwich Area. Given that there is a five-year supply of housing land, this application must be considered in the context that it is contrary to Policy GC2 of the Development Plan.

For the above reasons it is considered that, the Development Plan is not out of date. There is no demonstrable deficit in the supply of housing land. The application site by virtue of its size and proposed number of dwellings would be overly large when considered in the context of Policies 15 and 9 of the JCS and the location of the application site would be contrary to Policy GC2 of the DM DPD.

Furthermore, the site has been promoted by the applicant through the 'Call for Sites' consultation and has not been shortlisted going forward as a preferred site for inclusion in the new development plan. 'This site is not considered to be reasonable for allocation as it is separate from the built edge of the village and development here would be quite remote from the services and facilities in the main part of the village. There is no safe walking route to Horsford Primary School.'

Notwithstanding the principal objection as set out above cannot be overcome, I consider that if the site were allocated for development or located within the defined settlement limits, the details submitted in support of the outline planning application do demonstrate that the proposal could be policy compliant in all other respects, subject to further details.

Open Space

Policy RL1 of the Development Management DPD requires development consisting of five dwellings or more to make adequate provision for recreation. The application proposed to provide approximately 1.8 hectares of on-site open space, which is in excess of policy requirements. Off-site contributions for green infrastructure would need securing through the completion of a Section 106 Agreement.

Affordable Housing

Policy 4 of the Joint Core Strategy requires sites of 16 or more dwellings to provide 33% affordable housing. The application indicated that it would be able to provide 36% on-site affordable housing. This above policy delivery of affordable housing has not been backed up by any viability assessment and would need securing through the completion of a Section 106 Agreement.

Highways

The access arrangements raised no objections from the Highway Authority. The combined footpath/cyclepath linking the site to Church Street via Holt Road would provide a safe route for future occupants of the development across the frontage of the site. A safe crossing point would need to be created at the junction with Church Street to link the development to the rest of Horsford.

Development Area (Trees and Listed Buildings)

Through negotiations, the development area has been reduced in order to avoid the large trees on the site and to allow a visual connection between the Listed Building (Horsford Hall) and views through to the Church situated on Church Street. The Conservation Officer has agreed that the proposed development area achieves a suitable compromise between allowing development of the site while protecting important heritage assets. As a result, the number of proposed houses reduced from 65 to 47 although there are still some significant trees to the south of the site that may have implications for site layout and ultimately the number of dwellings possible for the site.

Other Benefits

Community use of the open space has been cited as a benefit of the proposed development and the scheme would open up a new area of publicly accessible green space although it is somewhat detached from the village. Use of the open space for football training would not necessarily preserve the parkland feel of the open space and introduce an intensity of use that could have a detrimental impact on existing and proposed residents. Providing a parking area for the village, the

church and associated community based activities appear to be impractical given the location and disconnection from the Church and the village even with the provision of a footpath and safe crossing and it is difficult to see how this could be considered a benefit of the proposed development.

It is therefore acknowledged that the proposed scheme could deliver affordable housing above policy requirements and publicly accessible on-site open space. The proposal would be required to make financial contributions in the form of Community Infrastructure Levy and Section 106 payments that would benefit the local area. It is also acknowledged that the site could provide other community benefits such as parking for the church and provide a training facility for local youth football teams albeit that this may not be practical. It is recognised that there would be short-term benefits for the economy in relation to the construction phase of the development and that there is some potential for longer term benefits from expenditure by future residents.

As you have already been advised, your request for the application to be determined by Planning Committee has been discussed but has been rejected.

Yours sincerely

Mrs Julie Fox
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