

# Carter Jonas

## **GNLP HELAA Addendum I (2018) and Addendum II (2020) Marsham Housing Site Assessment Matrix, (February 2021 update)**

The following table sets out the assessments of two sites in the village of Marsham as set out in the Housing and Economic Availability Assessment (HELAA) report prepared by the Greater Norwich Local Plan team. The two sites include a the Noble Foods former poultry unit on the northern side of the village (reference GNL3035) which has so far been rejected and site known as 'Land South of Le Neve Road' (reference GNL2143) on the southern site of the village, which has been chosen as a draft allocation in the emerging Local Plan. The two sites are listed in the table in turn, firstly a row indicating the Council's assessments and ranking against the sustainability criteria. Below this, a row has been added below each site a second row labelled 'Suggested Ranking', which indicates how we would suggest that the sites should be ranked. In the final row we set out our comments, which include our original comments row was drafted in March 2020 for the regulation 18 consultation and therefore a 'February 2021' update has been provided, which provides additional commentary based on the responses to the reg 18 consultation, the latest site assessments and new evidence prepared by Noble Foods Ltd.

# Carter Jonas

GNLP3035 Fengate Farm												
Overall HELAA Conclusion		Appropriate										
LPA Availability and Achievability Conclusions				Available within 1-5 years, developable within 1-5 years. Assumed to be viable.								
LPA Suitability Conclusions				The site is located adjacent to the settlement limit. Access from old Norwich Road subject to highway improvements could be an option. In walking distance to local services although no pavement access to the school. The land is Grade 3 agricultural land. Sewage upgrades required to support development. Sites of ecological interest within 3km (but none of which are very close to the site). Bolwick Hall and its garden house and stable block are located approx. 270 metres to the north east of the site. Suitable for the land availability assessment.								
Compatibility Neighbouring Uses												
Transport and Roads												
Open Space and GI												
Historic Environment												
Biodiversity and Geodiversity												
Townscapes												
Significant Landscapes												
Market Attractiveness												
Flood Risk												
Contamination												
Utilities Infrastructure												
Utilities Capacity												
Accessibility												
Access												
Address				Fengate Farm								
Site No.				GNLP3035 (HELAA Addendum II)								
Suggested Ranking				GNLP3035 Suggested Ranking								

# Carter Jonas

## March 2020 Comments

For 'accessibility' the amber ranking is appropriate, although the site only just falls short of a 'green' ranking as it is just about within 2km of additional schools and facilities in Aylesham. This is linked by a continuous cycle/pedestrian path alongside the A140; therefore, it is possible for residents to access these further services by foot / bicycle and applying CIHT guidance, 2km is considered an acceptable walking distance for school access and employment.

Regarding 'contamination', a phase I contamination assessment supporting application reference 20131533 (Thomas Consulting, October 2013) identified no pollutant linkages which would preclude development of the site without appropriate remedial works being undertaken. 'Amber' seems appropriate given further intrusive investigation would be recommended; although the report provides evidence that there are no substantial contamination risks that would preclude development.

Regarding 'market attractiveness' Rightmove sales data (obtained 06/03/2020) confirms that the average house price in Marsham considerably exceeds the average at £321,750. This is more expensive than nearby Aylsham (£286,360), Hevingham (£261,625) and Buxton Heath (£266,684). Overall sold prices in Marsham over the last year were 38% up on the previous year and similar to the 2016 level of £318,804. Given a strong local market, the site should be considered attractive to the market and could be ranked as 'green' for this criterion.

Regarding 'biodiversity and geodiversity', this should be ranked as 'green'. The site is not located adjacent or very close to a designated wildlife site. The nearest SSSI is located 2km away and the nearest CWS, 350m away. An Ecological Appraisal (Envirotech, October 2013) was commissioned to support application reference 20131533. The evidence suggested no unacceptable adverse impacts.

For 'Historic Environment', there are three grade II listed buildings beyond the southern boundary, although the site has no relationship with the setting of these heritage assets. The redevelopment of the site which currently hosts unattractive fire damaged poultry sheds with a high-quality designed housing scheme has the potential to enhance the historic environment. Previous appeals / planning decisions have not raised heritage as an issue. This criterion should therefore be ranked as 'green'.

Land uses around the site are residential and therefore a proposed residential development would be compatible with the existing and adjoining uses. 'Compatibility with neighbouring / adjoining uses' should therefore be ranked as 'green'.

# Carter Jonas

## February 2021 Update

### Access and Accessibility

A comprehensive access appraisal has been prepared by SLR Consulting (Feb 2021). This includes a review of the previous planning applications on the site and sets out a revised access design which helps to address the concerns previously raised on the suitability of the access and the accessibility from site to Marsham Primary School by foot.

The access statement demonstrates how vehicular access suitable to serve a development of up to 35 dwellings can be safely achieved [update once report is received].

The statement also indicates how pedestrians can access key local facilities including the village Primary School safely by foot. It is possible to walk to the school from the site the whole way on a footpath via Le Neve Road and Wathen Way. This would be a **XX** minute walk, which is well within the CIHT guidance limits and is only **XX** further than the draft allocation site at Le Neve Rd (GNLP2143) – a marginal difference, yet Fengate Farm is a much better alternative when taking into account other sustainability considerations, particularly heritage and landscape impacts.

The green ranking for access is therefore considered appropriate and the rejection of the site up to this point on access grounds is both inconsistent with the HELAA ranking and is not justified having regard the points above.

### Biodiversity

An updated preliminary ecological assessment (The Landscape Partnership, January 2021) supports our representations. This concludes that there are no fundamental constraints to development subject to mitigation measures. This up-to-date evidence supports our conclusion above that the site should be re-ranked as green in relation to biodiversity and geodiversity'.

### Heritage

A Heritage Assessment (Orion, Jan 2020) supports our representations to provide a full and robust assessment to serve as evidence.

At paragraphs 4.5-4.15 the assessment concludes that there is very limited intervisibility between the site and nearby designated heritage assets and subject to appropriate design there will be no adverse impacts. The assessment concludes that there are no constraints to development, contrary to the 'amber' HELAA ranking which was based only upon a high-level assessment. The site should therefore, evidentially be re-ranked as green in terms of heritage. These conclusions contrast significantly to those associated with the Le Neve Rd site (discussed further below).

### Significant Landscapes

# Carter Jonas

A Landscape Appraisal (FPCR, January 2021) supports our representations. This provides robust evidence supporting the 'green' ranking of the site in landscape and visual terms. The site has a low landscape value and development is likely to have limited to no adverse visual impacts and has the potential to enhance the site in visual amenity terms. Development of Fengate Farm would also be consistent with the objectives of the Broadland District Landscape Character Assessment for the landscapes surrounding Marsham, which is to focus development within the built up area of settlements. These findings contrast starkly to the assessment of the Le Neve Road as discussed further below.

## Other Updates

We have no other further updates. Our conclusions from March 2020 on the re-ranking 'Market Attractiveness', 'Compatibility with Neighbouring Uses' as 'green' remain up to date.

# Carter Jonas

GNLP2143 South of Le Neve Road										
Overall HELAA Conclusion	Unsuitable (as it overlaps site GNLP0229)									
LPA Availability and Achievability Conclusions	Available within 1-5 years, developable within 1-5 years. Assumed to be viable.									
LPA Suitability Conclusions	The site is proposed for residential development and the extension to the cemetery. The site is accessible but it located close to listed buildings. Sewage and waste water capacity upgrades would be required. A SAC and two SSSIs are located within 3km. Development would not result in the loss of open space or high quality agricultural land. There are no known constraints in terms of utilities, contamination or flood risk. In principle the site is suitable for the land availability assessment. However, as it overlaps site GNLP0229, it will not be counted to avoid duplication and will therefore be marked as unsuitable.									
Compatibility Neighbouring Uses	Green									
Transport and Roads	Green									
Open Space and GI	Green									
Historic Environment	Green									
Biodiversity and Geodiversity	Yellow									
Townscapes	Yellow									
Significant Landscapes	Green									
Market Attractiveness	Yellow									
Flood Risk	Green									
Contamination	Green									
Utilities Infrastructure	Green									
Utilities Capacity	Yellow									
Accessibility	Yellow									
Access	Green									
Address	South of Le Neve Road									
Site No.	GNLP2143 (HELAA Addendum I)									
GNLP2143 Suggested Ranking	GNLP2143 Suggested Ranking									

# Carter Jonas

## **March 2020 Comments**

Significant Landscapes should be ranked as 'amber'. Applying the HELAA methodology, development is likely to result in some degree of harm to the landscape and is unlikely to have a 'neutral or positive impact' on the landscape setting. The Broadland DC Landscape Character Assessment SPD states in reference to LCA E2 within which the site falls that the landscape setting of villages should be preserved. The LCA is sensitive to development of prominent skyline locations and which 'may reduce the vertical significance of historical features'. The site sits on an elevated position on the southern edge of the village and development has potential to harm upon views towards the tower of All Saints Church. By contrast, GNLP3035 is a redundant farmyard and better contained within the centre of the village and therefore less sensitive in landscape terms.

'Historic Environment' should certainly be ranked as 'amber' rather than 'green'. The site is located adjacent to the Grade I listed All Saints' Church and abuts the graveyard, being located only 50m from the building itself. The site is also located adjacent to the Grade II listed Rectory. The site comprises open countryside, which forms an important part of the setting within which these heritage assets are experienced. As such, there is a clear potential for harm and as a minimum the site should be ranked 'amber' against this criterion. Even with mitigation, there is likely to be some degree of harm against which the public benefits would need to be weighed. By contrast, GNLP3035 in the centre of the village is less sensitive in terms of heritage and owing to the unattractive present appearance of the site, a carefully designed development has the potential to enhance the historic setting.

## **February 2021 Update**

### Heritage

The Heritage Assessment (Orion, January 2021) supporting these representations provides a robust assessment of the site in terms of heritage constraints at paragraphs 4.16-4.25. The assessment finds that any development on the site will result in significant adverse impacts upon the significance and the setting of the grade I listed Church of All Saints.

As a grade I listed asset the building is of exceptional interest and only 2.5% of the 400,000 listed buildings in England fall into this category, the preservation of grade I listed buildings must be afforded the greatest level of weight having regard to paragraph 193 of the National Planning Policy Framework (2019). The open nature of the agricultural fields to the west and south-west contribute to the open setting of the heritage asset, with the church tower having prominence from these vantage points (there is an extensive network of public tracks in these areas). The development of Le Neve road would harm the immediate setting of the church and would visually impede important views. This conclusion contrasts to the assessment of the Fengate Farm site which does not face any significant heritage constraints as discussed further above.

# Carter Jonas

An objection received from Historic England to the proposed allocation of this site raises similar points.

The draft allocation policy GNLP2143 states that *'development must conserve and enhance the significance of the grade I listed Church of All Saints, the grade II listed Old Rectory, Colenso Cottage and the Marsham War Memorial to the east of the site, including any contribution made to that significance by setting...This includes but is not limited to landscaping to the east of the site and a concept diagram showing where open space and landscaping would be located'*. However, it is argued that harm should be avoided in the first instance by locating development where it would avoid or minimise harm to heritage assets. Fengate Farm is an available alternative site which is unconstrained in heritage terms. An important feature of the setting of the Church of All Saints is the wide open countryside within which it is experienced. Any development within this setting would therefore be harmful, regardless of any proposed mitigation measures such as open space and landscape buffers, as it would alter the nature of the setting by introducing built development and urbanisation. Therefore, criterion 3 of policy GNLP2143 will not avoid significant harm from arising as a result of development.

Having regard to the findings of the Heritage Assessment and taking into account the objections on heritage grounds raised by other consultees in particular Heritage England, this site should certainly be downgraded at least to 'amber' status. It is unclear why the site has been ranked as 'green' on the basis that it is located adjacent to a grade I listed building and within the setting of other nearby grade II listed buildings and is therefore demonstrably constrained in heritage terms.

## Significant Landscapes

The submitted Landscape Appraisal (FPCR, January 2021) concludes that Le Neve Road site forms part of a highly valued agricultural landscape, which provides an open rural setting to Marsham village and the All Saints Church (Grade I Listed) and development would result in significant landscape and visual harm. This contrasts significantly to the conclusions on Fengate Farm discussed above. The evidence suggests that 'significant landscapes' should therefore be re-ranked to amber or red.