BROADLAND DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Appeal by: Mr T Harper against the refusal of Broadland District Council to grant planning permission for the erection of 64 dwellings with associated garages and amenity work together with public open space on land off Wyngates, Blofield, Norwich.

Planning Inspectorate reference number: APP/K2610/A/13/2198950

Broadland District Council planning application number: 20130296

LOCAL PLANNING AUTHORITY PROOF OF EVIDENCE: SUMMARY

The proposed development is contrary to Policies 7, 9 and 14 of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk 2011 and paragraph 17 (bullet point 1) of the National Planning Policy Framework (NPPF). The development is also premature in advance of the adoption of the Site Allocations Development Plan Document (SA DPD).

The JCS was adopted in March 2011 although some wording was subsequently remitted as a result of a High Court ruling. The Examination in Public for those remitted parts was held in July 2013. This did not propose any major changes to the previously adopted strategy and it is anticipated that the Inspector’s report will be available in late November and that adoption will be in January or February 2014.

Policy 4 of the JCS states that allocations will be made to ensure that approximately 33,000 new homes will be delivered within the Norwich Policy Area (NPA) between 2008 and 2026, distributed in accordance with the Policies for Places. A minimum of 21,000 of these dwellings will be provided through new allocations while the remainder will be met through existing commitments. Policy 9 of the JCS states that the NPA is the focus for major growth and development and that housing need will be addressed by the identification of new allocations distributed across a number of locations. The remitted text identifies the Old Catton, Sprowston, Rackheath and Thorpe St. Andrew growth triangle as a focus for growth in Broadland but that smaller sites elsewhere within the Broadland part of the NPA should contribute a minimum of 2000 dwellings. Although remitted, the figure of 2000 dwellings is a material consideration and Policy 9 states that allocations to deliver the smaller sites will be made in accordance with the
settlement hierarchy and local environmental and servicing considerations. This approach was broadly recognised by the Inspector at paragraph 20 of the appeal decision relating to the land on the north side of Yarmouth Road in Blofield (ref. APP/K2610/A/12/2177219).

Policy 14 of the Joint Core Strategy identifies Blofield as a Key Service Centre and states that land will be allocated for residential development for approximately 50 dwellings with the possibility of more to contribute towards the smaller sites allowance in the Broadland part of the NPA. This policy has not been remitted. The commentary to this policy at paragraph 6.50 explains that there are more sustainable options for accommodating new housing developments in the NPA and consequently, only a modest housing allocation of approximately 50 dwellings is proposed for Blofield.

The Council accepts that Blofield is a sustainable location for additional residential development and that there will be some growth that will be in excess of the allocation of 50 dwellings and contributes towards the smaller sites allowance of 2000. In its ‘Site Allocations Consultation – Preferred Options 2013’ document, the Council identifies its preferred options in Blofield as those that already benefit from planning permission: a mixed use development that includes a maximum of 175 residential units (granted outline planning permission on appeal in March 2013 (appeal ref. 2177219)); and, a development of 22 dwellings which was granted full planning permission in June 2013 following completion of a legal agreement.

In terms of numbers of dwellings, the approval of 64 further dwellings in Blofield will, taking account of approved estate scale housing development referred to above, total 261 dwellings and represent a significant increase in the size of the settlement, being about 5.2 times the level of 50 dwellings referred to in Policy 14 of the JCS. If the Garden Farm site was added to this, the number of dwellings being proposed will be approximately 6.7 times the level of 50 dwellings.

Using figures taken from paragraph 22 of appeal decision ref. 2177219, the estate scale commitment of 197 dwellings alone could result in the population of Blofield increasing by approximately 25%. Using the same figures, if the current appeal is allowed, the population of Blofield could increase by approximately 33% and if the land at Garden Farm that is the subject of a separate appeal is granted planning permission, the population of the Blofield could increase by approximately 43%.

At paragraph 26 of his decision on land to the north of Yarmouth Road, the Inspector notes that 175 dwellings “is on the high side for Blofield, which is one of the smaller Key Service Centres”. It is considered that this proposal, in addition to the extant permissions for up to 197 dwellings, would result in a housing commitment that would be more appropriate at a settlement higher up the settlement hierarchy.

The Council accepts that there is less than a five year supply of land for housing in the NPA and that the relevant housing policies of the Broadland District Local Plan (Replacement) are out of date. However, development at this overall scale will cause demonstrable harm by undermining the plan led approach advocated
by paragraph 17 (bullet point 1) of the NPPF and the spatial strategy and settlement hierarchy set out in the up to date JCS. It will result in a disproportionate amount of development for the district being carried out in one area. The proposal is therefore contrary to Policies 9 and 14 of the JCS.

The figures provided above indicate that the cumulative impact of approved and proposed development in Blofield will represent a significant influx of growth over a relatively short period of time. It will be difficult to assimilate this into the community and is likely to lead to a disparity between the local population and local facilities and services. The Council is consequently of the view that this proposal is contrary to Policy 7 of the JCS.

Broadland District Council is currently preparing its SA DPD and it is anticipated that adoption of this DPD will take place in late 2014 or early 2015. The Inspector for appeal ref. 2177219 had regard to this issue in paragraphs 37 and 39 of his decision and the Council considers that the current appeal proposal is premature in advance of the SA DPD too. To allow the appeal would pre-determine decisions about the scale and location of growth elsewhere, which should be addressed through the emerging SA DPD.

Additionally, the first core planning principle in paragraph 17 of the NPPF explains that planning should be genuinely plan led, empowering local people to shape their surroundings. The emphasis that the NPPF places on the plan led system suggests that in many circumstances, plan led development is more appropriate to ensure the right development in the right place at the right time. This proposal seeks to circumvent this plan led principle and given the existing estate scale housing commitment in Blofield, it is considered that the plan led approach should be allowed to take place without being undermined.

However, the Council is not closed to development and is taking steps to try and reduce the housing deficit by taking a pragmatic approach within the Broadland part of the NPA by permitting appropriate developments in appropriate locations while the JCS and SA DPD are being repaired and prepared.

In conclusion, the Local Planning Authority considers that this proposal represents an unacceptable form of development that is premature in advance of the Site Allocations Development Plan Document and is contrary to Policies 7, 9 and 14 of the Joint Core Strategy and paragraph 17 (bullet point 1) of the NPPF.