Planning Statement

Proposed development of 64 Houses
Land off Wyngates, Blofield
Norwich

For Norfolk Homes Limited

February 2013
Report Ref. 275 – Planning Statement

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1 Introduction

This planning statement is submitted on behalf of Norfolk Homes in support of a planning application for the development of 64 dwellings, vehicular access, provision of open space and associated works on land at Wyngates, off Yarmouth Road, Blofield.

The site has been identified by Broadland District Council (BDC) in the second round of consultation on their Site Allocations Development Plan Document (2011) as an alternative site for development; but has yet to be formally adopted. The site was proposed by the applicants when the first round of public consultations on potential housing sites in the Broadland Area was undertaken in 2009. At this time only two potential sites were included for Blofield. Following this consultation exercise in 2009 a number of alternative sites were put forward by individual landowners, including the applicants Norfolk Homes. This resulted in four more sites in addition to the original two being included in the amended Site Allocations DPD 2011. Four of the six sites are currently the subject of planning applications and one of these has recently undergone a Public Inquiry following its refusal of planning permission by BDC in 2011. The outcome of this appeal is awaited at the time of submitting this application.

The application has been prepared with regard to the adopted Development Plan which in this instance consists of The Greater Norwich Joint Core Strategy 2011 (JCS) The Broadland District Local Plan (2006) Saved Policies and the National Planning Policy Framework 2012 (NPPF).

Throughout the process of preparing this application and following the guidance contained in S122 of the Localism Act 2011 (not yet in force), Broadland District Council’s adopted Statement of Community Involvement and its Community involvement protocol the applicants have consulted with the local community, various statutory and other consultees and the District Council over the past 12 months in preparing this application.

More details of this consultation exercise are provided in the accompanying Design & Access Statement.

This Planning Statement has been prepared, together with a number of accompanying technical reports, in support of the application. This statement will set out the need for the proposed development, how it meets the policies of the Development Plan and as a result of this how it rates more favourably than any of the other potential short listed sites in Blofield in terms of its scale, location and its relationship to the existing built up area and the surrounding countryside. The Planning Statement will therefore examine the proposal in the following order:

- Description of the site and its setting within Blofield
- The Proposed Development
- Planning Policy Context
- Evaluation & Assessment of the proposal
- Conclusions
2 Site Description & Context

The application site consists of 4.4 ha (11.88 acres) of agricultural land found at the north eastern end of Blofield. It is well contained within the existing settlement with very little views of it from outside the site. It is substantially surrounded by existing development on its western, southern, and part of the eastern boundaries and is cut off from the open countryside to the north by the A47 trunk road which links Great Yarmouth to Norwich. The land is generally flat although there is a gentle slope towards the south-western corner. The boundaries to the site are well established and consist of a mix of hedgerows, mature trees and boundary fences to existing properties which adjoin the site. The northern boundary of the site adjoins another shortlisted housing allocation which is currently the subject of an outline application, by Norfolk County Council, for 14 dwellings which will be accessed from Doctor's Drive, off Plantation Road. This latter application shows that the proposed 14 dwellings will be grouped at the western end of the site and the land adjoining this application site is intended to be open space/woodland. The two extensive areas of proposed public open space will directly adjoin each other and provide a buffer from traffic noise from the A47 to the proposed dwellings that form part of this application.

3 The Proposed Development

This is a detailed application for the erection of 64 two storey dwellings which will include a mix of one, two, three and four bedrooms.

Twenty-one of these dwellings will be affordable homes including one, two & three bedrooms and offering a mix of tenure as recommended by Broadland District Council Housing Department. A more detailed account of the affordable housing provision is included in the Design & Access Statement.

All of the properties will be provided with either garages or allocated parking spaces. The layout provides for two areas of public open space within the housing site itself. A further and more substantial area of public open space is to be provided beyond the northern boundary of the built area which will have direct links into the housing site but will also be available for the benefit of the wider community. How all of this open space will be laid out and the sort of facilities it might provide e.g children's play equipment, tennis courts, playing pitches, will be the subject of further discussions between the applicants, the District Council and the local community.

Access to the site will be achieved from the existing access road which serves the development known as Wyngates. This in turn takes its access from the Yarmouth Road. The applicants will undertake the necessary improvements to the junction with the Yarmouth Road in terms of extending the vision splays to improve visibility as required by Norfolk County Council Highways Department.

The thinking behind the layout and design of the development is discussed and explained in more detail in the accompanying Design & Access Statement.

As mentioned previously the application has been prepared with regard to the Development Plan, together with the statutory and local validation requirements and in particular the policies and relevant requirements discussed in detail in the policy section below. A wide consultation exercise was undertaken involving the local community (newspaper notices, house to house leaflet drop and public exhibition) statutory and other consultees, BDC and Blofield Parish Council over the past 12 months. A more detailed account of the community engagement and consultation process is provided in the Design & Access Statement.
The applicants Norfolk Homes and their consultants have identified through the consultation exercise the required supporting information, assessment and reporting that should accompany this application for the purpose of validation. The table below provides details of this information and those involved in the preparation of the reports. The accompanying reports (both digital and paper versions) are included with the application.

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Ground Investigations:
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4 Policy Context

Section 38(6) of The Planning and Compulsory Purchase Act 2004 requires that decisions on planning applications are made in accordance with the adopted Development Plan unless material considerations indicate otherwise. This requirement is reiterated in the advice contained in paragraphs 11-12 of the National Planning Policy Framework (NPPF) March 2012. Hierarchically the plan led system until recently comprised of the following:

- National Planning Policy. This is contained in the National Planning Framework (NPPF) which was published in March 2012 and replaces various Planning Policy Statements and Guidance Notes
- Regional Planning Policy. The Regional Spatial Strategy was contained in the East Of England adopted 2008. This plan however is the first regional strategy to be recently revoked on January 3rd this year along with saved policies of the structure plan. It no longer forms part of the development plan therefore for the purposes of preparing or determining planning applications
- Local Planning Policy. This is found in Local Development Frameworks (LDF’s) and saved policies of Local Plans

4.1 Development Plan

For the purposes of this application the development plan for Broadland District Council comprises of the following documents;

- The Greater Norwich Joint Core Strategy (March 2011)
- Broadland District Local Plan Replacement (2006) Saved Policies
- The National Planning Policy Framework (March 2012)

The Greater Norwich Joint Core Strategy (March 2011)

The Greater Norwich Joint Core Strategy (2011) (JCS) represents a coming together of three Local Authorities, Norwich City Council, Broadland District Council and South Norfolk District Council in a consolidated attempt to resolve the spatial planning challenges facing the sub-regional area of South Norfolk also known as Greater Norwich. The Joint Core Strategy (JCS), as it is frequently referred to, was adopted by all three councils in March 2011 and covers the period from 2008 - 2026.

A subsequent legal challenge to the High Court has resulted in part of the strategy being remitted, the area known as the North East Growth Triangle, and being subjected to further consultation and examination. It was considered that the SEA carried out by the GNDP did not adequately explain the alternatives to the North East Growth Triangle and that the assessment also failed to consider the alternatives in the same depth as that option. The overall housing and employment requirements were not remitted and 27,000 new jobs and 36,820 new homes are to be delivered by 2026. The unremitted housing requirement for the Broadland part of the NPA to be delivered during the plan period remains at 9,000 dwellings.

The remitted parts of the JCS have been reevaluated and a new assessment has been...
undertaken of alternatives to meet the JCS growth requirements. A new sustainability appraisal has been prepared which explores alternative options for delivering the Broadland part of the NPA requirement. The outcome of this appraisal was published for consultation in August 2012 in the JCS Proposed Submission Document and, while alternative options were proposed and considered, the Council sets out the same strategy for growth as suggested in the pre-challenge JCS. Effectively the North East Growth Triangle will accommodate major strategic growth, 7,000 dwellings, with a small sites allowance, 2,000 dwellings, being distributed within the remainder of the NPA. These housing figures are expressed as minimum figures.

Section 6 of the JCS deals with Policies for Places and includes policies 9 to 19. It sets out the overall growth requirements for the Greater Norwich Area and separates this into the Norwich Policy Area and the Rural Area for Broadland and South Norfolk. JCS policy 9 discusses a strategy for growth in the NPA and seeks to identify the broad locations for the focus of growth. Overall during the plan period a total of 21,000 dwellings will need to be provided. The policy identifies an hierarchy of settlements over which this growth will be spread comprising of the Norwich Urban Area, followed by main towns such as Aylsham, Diss, Harleston & Wymondham, Key Service Centres (KSC’s), service villages and other villages. The scale of development that may occur decreases with each level of the hierarchy. It is stated the smaller sites in the NPA that fall within Broadland will accommodate up to 2000 dwellings. Allocations to deliver the smaller sites will be made in accordance to settlement hierarchy and local environmental and servicing considerations. Para 6.6 states "The smaller sites allowance is intended to provide a balance between site sizes and locations to encourage flexibility and the shorter term delivery of new housing”.

JCS policy 14 identifies Blofield as a Key Service Centre (KSC) among 9 others. KSC’s possess a range of local services and facilities that enables them to meet local needs and those of surrounding areas and typically consist of the following, a primary school, a secondary school either within the settlement or one that is easily accessed by public transport, convenience shops, primary health care, village hall, library. They also possess public transport services for non-journey to work and leisure purposes. As Blofield is one of three KSC’s with more limited services than some of the others that have been identified, it is considered that there are more sustainable options for new residential development within the Norwich Policy Area and therefore only a very modest housing allocation of up to 50 dwellings is proposed.

Para 6.50 of the JCS describes Blofield thus;

"Blofield is a large village with a reasonable range of facilities, but limited shopping and employment. It is surrounded by high quality agricultural land. Secondary education is provided at Thorpe St Andrew There are more sustainable locations for accommodating new housing developments in the Norwich Policy area; consequently only modest housing allocation of approximately 50 dwellings is proposed..."

However it is also one of three KSC’s within the NPA that are identified as potential locations for additional development to help deliver the smaller sites allowance of 2000 dwellings (JCS Policy 9) in the Norwich Policy Area. The supporting text states where a range is specified for a particular settlement it is expected that new development will stay within that range. In exceptional circumstances however the range can be exceeded if it can be demonstrated that the resulting development respects the form and character of the settlement and brings sustainable benefits both for existing and new residents e.g. through improved local facilities or connections to them through meeting other defined local needs. It is the applicants belief that such circumstances apply here.

While the supporting text to Policy JCS14 quotes limited shopping and employment
opportunities amongst the reasons for only allocating a small amount of development in Blofield the main service that it is lacking is a secondary school. The nearest high school is at Thorpe St Andrew. This is located just a little over 10km (7 miles) away however and is on a direct bus route from Blofield. In the case of the application site children of high school age will simply have to walk the short distance to the Yarmouth Road to the appropriate bus stop. This is well within acceptable walking distance. Once in Norwich there will then be a walk of approx 1 mile to the high school, again this is well within acceptable walking distance for children of this age. Alternatively, three school bus services to Thorpe St Andrew High School operate direct from Blofield. There is also a direct bus route to the high school in Acle approximately 14 km (11 miles) to the east. It is considered therefore the lack of a secondary school should not preclude Blofield from being considered suitable for a larger amount of development. This is particularly relevant given that para 6.48 of the JCS indicates that KSC’s in the NPA, which includes Blofield, may be considered for additional allocations if it should prove necessary to meet the housing provision target, having regard to sites which can be made available in the higher order settlements as set out in the settlement hierarchy. This Planning Statement, together with the other supporting technical reports and the Design & Access Statement, will demonstrate that it is appropriate for Blofield to exceed the specified range mentioned in JCS Policy 14 of approx 50 dwellings. This site will help to accommodate the required housing provision with the Broadland area given the site’s availability, the shortfall in supply of housing land, the likely delays in the bringing forward of housing land in the smaller centres/larger allocations in North East Norwich, given the remitting of relevant parts of the JCS in the Broadland Area and the many benefits locally that will result from the development e.g. the generous provision of public open space and affordable housing and the support that future residents of the development will provide for existing local facilities and services. It is also emphasized, in the instance of this application the range of development is exceeded only very modestly and significantly less than proposed at Manor Park and also at Garden Farm which has recently been modified from a proposed development of 105 dwellings to 75. The development will fit in well and be very unobtrusive within the existing settlement.

Other JCS policies that have been taken into consideration in preparing this application include;

- **JCS Policy 1** Addressing climate change and protecting environmental assets. This policy requires new development to be sensitive to climate change and to promote sustainability. Development should be well located and designed to use resources efficiently.

- **JCS Policy 2** Promoting Good Design. All new development should be designed to the highest standard to create a strong sense of place.

- **JCS Policy 3** Energy & Water. Major developments will need to demonstrate the effort made to maximise the provision of energy from low carbon energy sources and the steps taken to maximise opportunities for sustainable construction.

- **JCS Policy 4** Housing Delivery. All new development will need to provide a mix of housing to provide balanced communities and to meet the needs of the area. A key requirement is the provision of affordable housing and to provide an appropriate tenure mix.

- **JCS Policy 6** Access & Transportation. The transportation system will be enhanced to develop the role of Norwich as a Regional Transport node, particularly through the implementation of the Norwich Area Transportation Strategy, and will improve access to rural areas. This includes, inter alia: the concentration of development close to essential services and facilities to encourage walking and cycling as the...
primary means of travel with public transport for wider access.

- JCS Policy 7 Supporting Communities. New development proposals are expected to maintain and enhance the quality of life and well being of existing communities, to promote equality and diversity and to protect and strengthen community cohesion.

- JCS Policy 8 Culture, Leisure & the Environment. The cultural opportunities offered are an important and valued part of the area. Existing cultural assets and leisure facilities will be maintained and enhanced including access to green space, including formal recreation, country parks and the wider countryside.

- JCS Policy 14 Discussed above.

- JCS Policy 18 The Broads. Areas in close proximity to the Broads will need to ensure that new development maintains and enhances the economy, environment, setting, visual amenity, recreational value and navigational use of the Broads.

- JCS Policy 20 Implementation. A co-ordinated approach will be taken to the timely provision and ongoing maintenance of infrastructure services and facilities to support development.

Broadland Area Local Plan Replacement 2006 (Saved Policies)/ Local Development Framework

The Broadland Area Local Plan (Replacement) 2006 Saved Policies makes provision for the plan area up to June 2011. The plan is therefore out of date in terms of the scale & location of new housing allocations. In Annex 1 of the NPPF para 214 provision is made for existing local plans adopted since 2004 to be given full weight for 12 months from the day of publication of the NPPF. Para 215 continues after this 12 month period however due weight can only be given to these policies according to the level of their consistency with the NPPF. The closer the policies in the local plan are to the framework the greater the level of weight they can be given.

Following the adoption of the JCS by Broadland District Council (BDC) a number of changes were made to the proposals map and a number of policies were updated. Included in the saved local plan policies that have been taken into consideration in this application is policy GS1. This policy makes provision for development within the settlement limits of Norwich fringe parishes, market towns and villages. Development proposals outside these limits will not be permitted unless they comply with a specific allocation or policy. The application site lies outside the defined settlement limits for Blofield & strictly speaking therefore it is contrary to local plan policy. It does however feature in the Site Allocations DPD having been put forward as an alternative site by the applicant Norfolk Homes to the two that were “shortlisted” in the original “call for sites” consultation exercise undertaken in 2009. The Site Allocations DPD has recently undergone a second round of public consultation and the responses are currently being considered by BDC. Similar to the Development Management DPD it will need to be subject to public examination and it is not expected to be adopted until 2015.

JCS Policy 14 suggests that an allocation of up to 50 houses can be made in Blofield however the policy also identifies it as a settlement where consideration can be given to a larger development in order to help meet the specified smaller sites allowance of 2000 dwellings in the NPA. Given that this application is for 64 dwellings it does not significantly exceed the suggested 50 and is felt to be on a scale that is compatible with the village certainly more so than the alternative proposals in Blofield, currently being...
Other local plan policies relevant to this application include:

- **GS2** the need to ensure all new development meets specified criteria such as meeting the needs of those with physical disability, ensuring good pedestrian & cycle access, accessibility by public transport, acceptable means of access to the development, residential amenity, etc.

- **GS3** Development will not be permitted where there are unacceptable effects in terms of accessibility for all, sustainable travel, impact on natural and historic environment, the highway network, amenity, agricultural land, air quality, drainage or contamination.

- **GS4** New development will only be permitted where there is adequate provision of utilities, services and social infrastructure.

- **ENV2** A high standard of layout & design is expected of all new development proposals.

- **ENV3** Future maintenance of landscaped areas.

- **ENV5** Protection and enhancement of the natural environment.

- **ENV20** Effect of development on potential archaeological sites.

- **ENV 23** Protection of water resources and the water environment.

- **HOU1** Estate Development; this will be restricted to the Norwich fringe parishes and Aylsham. Elsewhere unless on an allocated site estate scale development (6+ dwellings) will not be permitted.

- **HOU6** Density of development; the net density of estate scale development must be a minimum of 30 dwelling per hectare.

- **HOU7** Permission will not be granted for new residential development outside defined settlement limits.

- **TRA2** Transport Assessment requirements.

- **TRA3** Travel Plan requirements.

- **TRA4** Provision for pedestrians.

- **TRA5** Provision for cyclists.

- **TRA8** Development will be expected to make adequate provision for parking in accordance with the District Council’s guidelines.

- **RL7** Residential development will be expected to contribute to the provision of Open Space in accordance with the District Council’s standards.

- **CS2** Drainage and the use of SuDS where appropriate.

- **CS3** Development will not be permitted where it would adversely affect ground water sources.

- **CS8** Major development should include appropriate waste storage and recycling facilities.

- **CS9** Flood Risk.

- **CS14** Noise Levels.

### 4.2 National Planning Policy Framework (March 2012)

The principal and most up-to-date material consideration is the National Planning Policy Framework (NPPF) published in March 2012. This replaces Planning Policy Statements and Planning Policy Guidance which previously provided the basis for national planning policy. The NPPF sets out the Government’s planning policies for England and how it is expected these will be applied. The policies contained in the NPPF must be taken into
consideration by LPA’s in determining planning applications and developers should equally demonstrate that it has formed a major consideration when preparing planning applications for submission. In terms of this planning application, the following is felt to highlight the relevant text & policies.

**Sustainable Development**

This is identified as one of the main objectives of the planning system. Huge emphasis is placed on the need to support sustainable development wherever possible particularly where proposals are in accordance with an up to date development plan. Where local plan policies are absent, silent or out of date however planning permission should be granted (para 14). The NPPF highlights the importance therefore for LPA’s to have an up to date local plan in place. Paragraph 12 states“...Proposed development that accords with an up to date Local Plan should be approved....... It is highly desirable that Local Planning Authorities should have an up to date plan in place...”

Paragraph 17 of the NPPF identifies the 12 core principles of planning that should underpin both plan making and decision taking. The first of these principles is the need for a plan led system reinforced by up to date local plans. These should provide a practical framework to enable decision taking to be made on planning applications efficiently and with a high degree of predictability. Other core principles identified of relevance to this application are;

- Planning should not simply be about scrutiny but a creative exercise in finding ways to enhance and improve the places where people live their lives.
- Planning should be proactive in driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs.
- Planning has an obligation to identify and meet the housing, business and other development needs of an area.
- Planning should ensure the delivery of high quality design and a good standard of amenity. It should support the transition of a low carbon future in a changing climate, taking account of flood risk and coastal change and encouraging the reuse of existing resources and use of renewable resources.
- Planning should contribute to conserving and enhancing the natural environment and reducing pollution.
- Planning should promote mixed use developments and encourage multiple benefits from the use of land in urban and rural areas recognising that some open land can perform many functions e.g. for wildlife, flood risk storage, recreation etc.
- Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant developments in locations which are or can be made sustainable.
- Delivering sustainable development is a fundamental requirement of planning and how this can be achieved is discussed under various headings.

**Good Design/ Community Engagement**

Section 7 (paras 55 - 68) identifies the need for Good Design and states it is a key aspect of sustainable development indivisible from good planning and should contribute positively to making places better for people. Equally planing policies should avoid being unnecessarily prescriptive or detailed and should concentrate on the overall scale, density, massing, height, landscape, layout, materials and access of the new development in relation to neighbouring buildings and the local area generally (para 59).

Applicants are expected to work closely with those directly affected by their proposals and allow the views of the community to shape the designs that emerge. Proposals that can demonstrate that engagement with the local community has helped shape the
design of the new development should be looked upon more favourably (para 66).

Promoting Healthy Communities

Section 8 (paras 69 - 78) looks at Promoting healthy communities and sets out as one of its requirements the need for planning policies and decisions to aim to achieve places which promote "Safe and accessible developments, containing clear and legible pedestrian routes, and high quality open space, which encourage the active and continual use of public areas" (para 69). Having access to high quality open space and opportunities for sport and recreation can make an important contribution to the health & well being of communities (para 73).

Climate Change/Flood Risk

Section 10 discusses Meeting the challenge of climate change, flooding and coastal change (paras 93 - 108). "Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure (para 93)". New development should be planned in locations and ways which reduces greenhouse gases (para 95). Other criteria identified relevant to this application include the need for new development to be planned to avoid increased vulnerability to the range of impacts arising from climate change (para 99) and the requirement for new development wherever possible to be free of and not contribute to flood risk elsewhere (para 100 & 103).

Conserving & enhancing the natural environment

Planning is required to conserve and enhance the natural and local environment (paras 109-125) and a number of way in which this can be achieved is specified including

- protecting and enhancing valued landscape
- minimising impacts on biodiversity and providing net gains in biodiversity where possible
- ensuring that new development does not contribute to or put communities at unacceptable risk from or be adversely affected by noise pollution (para 109)

Transport

Planners need to assess applications to ensure opportunities for sustainable transport have been adequately taken up and that safe and suitable access is provided to meet the needs of the whole community (para 32)

Development should be designed to give priority to pedestrians and cyclists, minimise the conflict between traffic and cyclists/pedestrians, have access to public transport and create safe and secure layouts (para 35).

Sustainable Construction/Renewable Energy

Planning should support the transition to a low carbon future in a changing climate... and encourage the use of renewable resources e.g by the development of renewable energy. When determining planning applications LPAs should expect new development to comply with adopted policies for decentralised energy supply unless it can be demonstrated that it is not feasible or viable, and should take account of landform, layout, building orientation, massing, and landscape to minimise energy consumption.
Other issues of relevance to this application discussed within the NPPF include the following.

**Viability and Deliverability (paras 173-177)**

In pursuing sustainable development careful attention need to be given to viability and costs in plan making and decision taking. The sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development such as requirements for affordable housing, standards, infrastructure contribution or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive return to a willing land owner and willing developer to enable the development to be deliverable (para 173).

LPA’s should also assess the likely cumulative impacts on developments in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan when added to nationally required standards. The combined impact of all these standards and policies should not put the implementation of the plan at risk and should facilitate development through the economic cycle (para 174).

**Decision Taking/Determining application**

In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development (para 197).

**Housing Land Supply**

LPA’s should use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF including identifying key site which are critical to the delivery of housing strategy over the plan period.

LPA’s should update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing LPA’s should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land (para 47).

Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the LPA cannot demonstrate a five year supply of deliverable housing sites. (para 49)
4.3 Regional Policy

The East of England Plan is the first Regional Spatial Strategy to have been formally revoked on January 3rd of this year along with saved policies of the structure plan. It no longer forms part of the development plan for the purposes of preparing or determining planning applications. It is worth noting however Policy H1 identified Norwich as a “key centre for development and change” a regional focus for housing, employment, and other activities. 33,000 additional homes were to be provided in the Norwich Policy Area between 2001 – 2021 facilitated by development plan documents prepared jointly by the three councils, Broadland, Norwich and South Norfolk.

4.4 Other Material Considerations

As part of the Local Development Framework process BDC has been progressing its Site Allocations and Development Management Policies (DPD's).

BDC undertook a call for sites exercise in 2009 which identified in excess of 5000 potential development sites. Following an assessment of these sites a sort list of 62, including two sites within Blofield, were identified. These sites were published in the 'Site Allocations Consultation - Shortlisted Sites' document and were the subject of a sustainability appraisal. When this document went out to public consultation during 2011 a number of alternative sites were proposed by individual landowners including the application site by the applicants Norfolk Homes. This resulted in four more sites in addition to the original two making a total of six potential sites being included for Blofield in the amended Site Allocations DPD. This document was published for consultation in spring 2012 and BDC are currently considering the responses received. It is not anticipated the Site Allocations Document will be adopted by BDC until early-mid 2015. BDC has also been progressing its Development Management Policies DPD. Its Issues and Options document was the subject of consultation in September 2011. Similar to the Site Allocations DPD, it is not anticipated the Development Management Policies DPD will be adopted by the District council until early-mid 2015.

Interim Policy Statement

A further document of relevance to this application and adopted by Broadland District Council in June 2012 is the "Policy Statement on the determination of Housing Developments Promoted in advance of the Emerging Local Plan". This document has not been subject to public consultation and therefore can only have limited weight attached to it. Nonetheless it is an important consideration particularly when the NPPF places such importance on the need for up to date local plans and the provision of a 5 year housing land supply.

This report refers to the NPPF and acknowledges the saved policies of the Local Plan do not benefit from the transitional provisions of the NPPF if they are inconsistent with its up to date requirements. This document states applications should be considered against policies in the East Of England Plan, the JCS (where unremitted) the saved policies of the Local Plan as well as the presumption in favour of sustainable development as set out in the NPPF.

The report acknowledges "...In areas where there is less than a five year supply of housing land relevant Local Plan policies will need to be treated with appropriate caution". Nevertheless, the requirement for development to be "sustainable" as defined in the NPPF remains. The report then goes on to identify a number of considerations that will be applied in the determination of applications particularly on sites of 5+ dwellings which contribute to affordable housing. These considerations include;
• The scale and location of the proposal would not undermine the Spatial Strategy and Settlement Hierarchy of the Joint Core Strategy. Where a larger scale of development is proposed, the applicant will be expected to demonstrate how the proposal would contribute to increasing overall sustainability.

The proposal for 64 houses is primarily in accordance with the spatial strategy of the JCS.

• The site has been "shortlisted" as a potential development site (or subsequently a "preferred option") in the emerging Local Plan, and it can be demonstrated that planning permission would not unduly prejudice the plan-making process. Where undue prejudice would occur, or in the case of sites not "short-listed" or "preferred" there will have to be clear and compelling justification for the approval of any proposal.

The site has been included in the second round of consultations for the Site Allocations DPD of the Local Plan, which together with the first round 'suggested sites' forms the short list of sites from which the allocations will be chosen.

• The development would make a demonstrable contribution to "5 year Housing land Supply". Applicants are required to demonstrate that there is a less than five year supply of housing land within the relevant part of Broadland and that their proposal would materially improve the situation.

In the recently held Public Inquiry into the site at Manor Park, BDC accepted, as set out in the GNDP monitoring report 2011-2012, that there is only a 3.28 year supply of housing land available within the Broadland part of the NPA. There cannot be any dispute therefore that there is significantly less than a five year supply of housing land available within Broadland and that the development of this site would significantly contribute to improving this situation.

• Applicants must also be able to show the amount of housing that would be completed on the development in the next five years. In order to do this the applicant should be a recognised house building firm or have an agreement with such a firm and therefore be able to set out the building schedule for the development.

In the instance of this site the applicant is an established, reputable and active house builder and already owns a large part of the application site. With regard to the remainder of the site Norfolk Homes will be able to secure almost immediate possession of this land if planning permission is granted. It is anticipated that the entire development can be delivered with three to four years. The application therefore more than satisfies the requirements of this criteria.

• A demonstrable community benefit would result from the development. This "community benefit" might be the provision of community facilities such as open space, recreation facilities or affordable housing to meet an identified local need. Where an applicant uses "community benefit" as justification to support the development, the applicant will need to demonstrate not only the claimed benefit but also that the local community as a whole would attach significant value to the claimed benefit.

This application includes the provision of a large area of open space, just under
2ha, at the northern end of the application site. As things stand in Blofield there is a notable deficit of public open space and by providing this 2ha area in the location shown the situation will be greatly improved. Additionally and importantly the open space will be available for the use and benefit of the wider community and not just the future occupants of the development. Two smaller areas of open space will also be provided within the developed site to cater more directly for the occupants of the site itself. The applicants have indicated they are open to suggestions as to how the open space might be laid out and the type of facilities that it will provide. This will be the subject of further consultation between the applicants, Broadland District Council and Blofield Parish Council.

As pointed out above the proposed large area of public open space attached to this application directly adjoins a second generous area of public open space proposed as part of the development of 14 dwellings on land off Plantation Road, Doctor's Drive. There is the potential therefore if both applications are approved for these two areas of open space to be linked and essentially made into one large area. This would then offer the opportunity to have footpath and cycle path links running from the development off Wyngates to the development off Doctors Drive and onto Plantation Road. These would offer a very safe and sustainable route to the Doctor’s Surgery and the Primary School from the application site and avoid the need to cross busy roads at peaks times. It would vice versa offer residents from the western end of the village and the proposed development of 14 houses a much reduced journey to facilities at the eastern end of the village.

The development also makes provision for 21 affordable homes (33% of the total development) and will include a mix of one, two and three bedroom flats and dwellings. The development therefore entirely satisfies the policy requirements in terms of the provision of affordable housing and will greatly contribute to the stock of affordable housing available within Blofield. This is an important consideration given the under provision of affordable housing units within BDC. During 2011/2012 for example only 44 affordable homes were delivered while up to September 2012 only 40 affordable units had been provided. (Rural Living in Broadland - Rural Housing Week Sept 2012)

- **The development would deliver a higher proportion of affordable units than would otherwise required**

As discussed above the development will fully satisfy policy requirements in terms of the amount of affordable housing units that will be provided. It will not exceed policy requirement however as this would threaten the overall viability of the scheme and necessitate encroaching onto the proposed large area of public open space. The mix of affordable dwellings being provided and the types of tenure offered have all been developed in consultation with Broadland District Council Housing Department and entirely meets their recommendations. Given therefore, the very generous amount of open space that is being included as part of the proposal and the fact that this is a full application, anticipated to be delivered within 3 to 4 years from when permission is granted, it is felt these benefits more than compensate for not exceeding the affordable dwellings requirements.

- **Other policy requirements would be met as normal. Where policies relating to environmental standards or design are not only met but exceeded this will be given added weight.**

The development proposals are considered to comply with all normal policy
requirements.

- **The site has been identified through the Neighbourhood Plan process with clear evidence of community support.**

There is currently no neighbourhood plan for Blofield.

- **The developer can demonstrate compliance with relevant Government policy promoting appropriate public/community engagement.**

As part of the process of developing this scheme the applicants have undertaken numerous consultations with BDC, the local community and Blofield Parish Council. The application does meet the recommendations of Broadland District DC Community Involvement Protocol and the scheme as submitted has gone through numerous changes and alterations to try as much as possible to satisfy the concerns and requirements of the various statutory and other consultees.

Development proposals in the area identified in the JCS as the growth triangle will be subject to additional requirements depending on the judgement of the High Court into the remitted part of the plan area.

**Other Documents**

Other documents of relevance to the application include the following; the Broadland Landscape Character Assessment (Consultation) SPD. This document was due to be adopted the latter part of 2012 but this has yet to be confirmed, Broadland Parking Standards (2007), Affordable Housing SPD (2008) and Recreational Open Space (2008). All of these documents, apart from the Landscape Character Assessment which is yet to be formally adopted, form Supplementary Planning Guidance and are material considerations when determining planning applications and should also be taken into account in the preparation of development proposals.
5 Evaluation and Assessment of the Application Site

This section examines the suitability of the application in the context of the planning policies discussed above and other matters relevant to the consideration and determination of the application, including the reports and assessments that accompany it.

5.1 The development proposal in relation to the NPPF and the JCS

As mentioned above para 49 of the NPPF states that applications for housing development should be considered in the context of the presumption in favour of sustainable development and relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites. It has already been demonstrated that BDC does not have a five year supply of housing land available and at best housing land availability stands at 3.28 years. The Local Plan currently therefore is not up to date in this regard. This situation almost a year on from when the NPPF was published greatly weakens the status of the saved policies of the BDC Replacement Local Plan (2006). Para 214 allows LPA's to give full weight to policies adopted since 2004 for 12 months from the date of publication of the NPPF even if there is a degree of conflict with the NPPF. Following this 12 month period, the relevant date being March 27th 2012, due weight to local plan policies can only be given according to their degree of consistency with the NPPF. The closer the policies in the local plan match the policies in the NPPF the greater the weight that may be given.

In situations where the development plan is silent, absent or the relevant policies are out of date, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF taken as a whole, or unless specific policies in the NPPF indicates that development should be restricted.

Location of Development

The application site is outside but adjacent to the settlement limit that has been defined by the Local Plan for Blofield and therefore there is a presumption against development proposals unless they comply with a specific allocation and/or policy of the Local Plan. The Local Plan has not allocated any sites in Blofield and Policy HOU1 explains that estate scale development will be restricted to the Norwich fringe parishes and Aylsham. Elsewhere, estate scale development will not be permitted unless identified in the Local Plan proposals map. This proposed development would be considered contrary to this policy, however, regard must be given to the more up to date policies set out in the NPPF and the JCS.

The starting point is JCS however the legal challenge which resulted in some of the up to date policies that otherwise would be relevant, are in fact remitted for further consideration. However, the JCS does state that approximately 33,000 new homes will be built within the NPA by 2026. The remitted policies include the distribution of this housing growth in the Broadland section of the Norwich Policy Area, including the “Broadland Smaller Site in the NPA: 2,000 dwellings”. However, the strategic requirement to allocate sites for the delivery of 21,000 dwellings overall in the NPA (Policies 4 and 9) remain relevant and unaffected by the High Court decision. This figure is a material consideration.

Policy 14 also remains unaffected, in which Blofield and other Key Service Centres are identified for the allocation of housing.
**Scale of Development**

Policy 14 identifies Blofield as being suitable for residential development of a minimum of 50 dwellings. However, the main body of the policy text states that settlements that are in the NPA, such as Blofield, may be considered for additional development to help deliver the 2000 dwellings at smaller sites in the Broadland District that are located in the NPA.

By allocating a minimum of 50 dwellings to Blofield, the JCS acknowledges that the village is a sustainable location for new housing development.

While the policies referring to the 2000 dwellings on smaller sites in the Broadland part of the NPA is remitted as a result of the High Court challenge and consequently is to be treated as being at the Publication Stage, it is our contention that it is a material consideration in the context of Blofield. Whilst the policy cross referencing between Policies 9 and 14 in this context is now remitted, the fact remains that Blofield is acknowledged as being capable of accommodating some additional development above the figure identified in Policy 14 and the overall strategic housing requirement must be met. Meeting this requirement must be a material consideration in the determination of this application, particularly while large allocations are remitted.

**Five Year Housing Land Supply**

Alongside the above issues, consideration must also be given to the supply of land for housing in the NPA. Paragraph 49 of the NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development and that relevant policies for the supply of housing should not be considered up to date if the LPA cannot demonstrate a five year supply of deliverable housing sites. The 2011-2012 GNDP Annual Monitoring Report explains that there is a shortfall of 3,431 units (31.7%) of the requirement, or put another way a supply of 3.28 years. Given that there is this considerable shortfall in the number of units required, Local Plan Policy HOU1 must be considered out of date.

Indeed, given the constant year on year under delivery of the JCS since 2008, with some 3,300 dwellings shortfall between 2008 – 2012, it could be argued that under paragraph 47 of the NPPF the additional buffer allowance should be increased from 5% to 20% to “provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.” The GNDP’s data shows that a shortfall would remain even if the JCS were fully adopted, therefore adding greater weight for the buffer allowance of 20%. The contribution which this application would make towards meeting the need for housing in the area would therefore be of undoubted benefit.

Paragraph 14 of the NPPF should also be noted. This sets out a presumption in favour of sustainable development and sets out that for decision taking where the development plan is absent, silent or relevant policies are out of date, planning permission should be granted unless there are any adverse impacts that would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole.

The application proposals are capable of being implemented early within the five year period, the applicants are house-builders wishing to commence on site, therefore this site would make a contribution to the actual supply of housing land within Broadland.
**Affordable Housing**

Paragraph 47 of the NPPF requires the LPA to meet the “full objectively assessed needs for market and affordable housing in the housing market area”.

The overall shortfall in the lack of housing land supply and delivery is reflected in the low provision of affordable housing in the GNDP area. Policy 4 of the JCS sets a target of 33% of all housing should be affordable units. Broadland has not achieved this percentage since the start of the JCS period in 2008, achieving 27% in 2008/2009 and 2009/2010 and falling to just 19% in 2009/2010 and 2011/12, representing just 44 affordable dwellings completed.

The application proposals would provide 21 affordable homes of mixed size and tenure.

**Available, Suitable, Achievable, Deliverable, Viable**

The footnote to paragraph 47 stipulates that for sites to be considered deliverable they should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing can be delivered on the site within five years, and in particular that the development should be viable.

- **Available now** – the site is part owned by the applicant and part under option. The owner with the part under option is willing to release the land immediately on the grant of planning permission. The applicants owning the remainder of the site are house-builders. The site is therefore available now.

- **Offer a suitable location for development** – it is for the reasons presented in this document, and supported by the JCS, that the location is considered to be an appropriate and sustainable location for housing development.

- **Achievable with a realistic prospect that housing can be delivered on the site within five years** – as indicated above, the site is available, there are no major infrastructure constraints to frustrate delivery. Subject to the grant of planning permission the site would commence delivery of housing within about 12 months; thereby making an effective contribution during the current five year period.

- **Development is deliverable** – as stated above, the site is available and achievable, particularly as the applicants are part land owners and house-builders. The proposed houses can be delivered.

- **Development of the site is viable** – There are no constraints to the viable development of the site as proposed by this application.

There are three key factors to consider in assessing this application against the policies of the NPPF and JCS;

1. that Blofield is a sustainable location for housing development.
2. that the NPA does not have a five year supply of land available for housing; and
3. that the JCS figure of 50 dwellings is a minimum and more dwellings are needed to contribute towards the 2000 dwellings to be provided in the Broadland part of the NPS that is outside the of the proposed Growth Triangle.

Paragraph 14 of the NPPF requires that such proposals be considered favourably unless any adverse impacts of doing so would significantly and demonstrably outweigh the
benefits, when assessed against the policies of the NPPF or that there are other material considerations that indicate otherwise.

It is the applicants' contention that the proposed housing development is;

• it is a sustainable development
• it otherwise accords with the NPPF and relevant policies of the Development Plan
• the benefits accruing from the development would outweigh any perceived harm
• there are no other material considerations that militate against it

5.2 Prematurity

It is the normal process for land intended for housing development to meet the requirements of the JCS would be identified through the Site Allocations Development Plan Document (SA DPD). As part of this process two sites in Blofield, the Manor Park site and Garden Farm site, were shortlisted as potential housing sites in the SA DPD consultation document of 2011. A further document was published in Spring 2012, 'Site Allocations DPD Alternative Sites for Potential Development' which included the current application site amongst three others. All these sites would normally be considered in the round, however we are advised that adoption of this document is not anticipated until at least 2015.

As this application has been submitted in advance of the SA DPD being adopted it could be considered as being premature. However, given the relatively early stage at which the SA DPD is at it is considered that refusal of the application can not be justified on these grounds. Additionally, the Government document, “The Planning System: General Principles” is unequivocal in its position on prematurity and, taken together with the provisions of the NPPF and the current position regarding the supply of housing land within the NPA, provides a clear presumption towards the granting of planning permission for the current housing proposals. The 'General Principles' document states:

"Where a DPD is at the consultation stage, with no early prospect of submission for examination, then refusal on prematurity grounds would seldom be justified because of the delay which this would impose in determining the future use of the land in question".

Paragraph 18

"Where planning permission is refused on grounds of prematurity, the planning authority will need to demonstrate clearly how the grant of planning permission for the development concerned would prejudice the outcome of the DPD process".

Paragraph 19

'General Principles' also advises that refusal of permission on grounds of prematurity may be appropriate where a proposed development is so substantial, or where the cumulative effect would be so significant that the permission would prejudice the DPD by predetermining decisions about the scale, location or phasing of new development. This application represents less than 1% of the JCS requirement in Broadland, and cannot therefore be said to be substantial or cumulatively significant.

The application is therefore not considered to be premature to the DPD.
5.3 Other Material Considerations

The Localism Act 2011 states alongside the development plan and any other material considerations, LPAs should have regard to any local financial considerations so far as material to the application. Dwellings built on this site will generate revenue from the New Homes Bonus. This acts as an incentive for new house building and local authorities and their communities have a degree of freedom in spending revenues gained from this. It is therefore a further material consideration.

In June 2012 Broadland Council adopted the 'Policy Statement on the Determination of Housing Developments Promoted in Advance of the Emerging Local Plan'. This policy statement clarifies some of the material considerations that might be applied in the determination of applications and they might be 'weighed' in an application's consideration and determination.

In respect of the following criteria it is the applicants' contention that the majority of these are met by the application proposals; where they are not then there is a valid and material justification. Each is addressed in turn:

i. The scale and location of the proposal would not undermine the Spatial Strategy and Settlement Hierarchy of the JCS- Blofield is a sustainable location. It is well provided in terms of shops and other community services and public transport. The size of development proposed is wholly compatible with a Key Service Centre.

ii. The site has been 'short-listed' as a potential development site in the emerging Local Plan - It is one of three alternative sites on which consultation has been carried out. According to the Council's website, these sites have the same standing as the 'short-listed' sites:

"The next, scheduled stage of public consultation relating to the Site Allocations document will be based on our 'Preferred Options' from all the sites that are considered; giving communities a further opportunity to comment on potential development sites before a final choice is made."

The site offers a scale of development more suitable to the village than the Manor Park or Garden Farm sites. It is also less intrusive in the countryside, surrounded by existing housing on three sides and the A47 dual carriageway on the forth side.

iii. The development would make a demonstrable contribution to the 5 year housing land supply - There is no five year supply of deliverable sites in the NPA to meet the requirements of the NPPF and JCS, and the development of 64 dwellings would make a clear and demonstrable contribution to the supply and also be deliverable. It is the applicants' intentions that should planning permission be granted that an early commencement will be made on site.

iv. A demonstrable community benefit would result from the development - In addition to meeting the various policy requirements (including affordable housing at 33% and open space provision), the applicants propose to provide additional Public Open Space for community use, the exact use of the land being determined through consultation with the Parish and District Councils.

v. Other policy requirements would be met as normal - All other policy requirements will be met in full as demonstrated by this Statement and the Design and Access Statement.

vi. The site has been identified through the Neighbourhood Plan process, with clear evidence of community support - There is no Neighbourhood Plan in place but...
extensive community engagement has taken place.

vii. The developer can demonstrate compliance with relevant Government policy promoting appropriate public/community engagement – In accordance with the provisions of the Localism Act 2011, although the relevant provisions have yet to be introduced, and the Broadland District Community Involvement Protocol, the applicants have consulted widely with the local community, including the Parish Council, statutory and other consultees, and the District Council since August 2011. Full details are included in the accompanying Statement of Community Involvement.

We believe this weighs heavily in favour of the application proposals. Other issues and material considerations are addressed further below.

5.4 Design and Layout

The NPPF and policies of the Development Plan indicate that good design is a key component of sustainable development. Policy 2 of the JCS indicates that development should be designed to the highest possible standards and creating a sense of place, respecting local distinctiveness, landscape, character and setting of settlements including the urban/rural transition. Policy 1 also requires that residential development of this scale should achieve at least a silver (14 points) against the CABE Building for Life criteria.

The accompanying Design and Access Statement (including the Appendix C Building for Life Assessment) addresses and demonstrates in full the process of assessment, evaluation and design of the proposed housing development. However, the approach towards the development's design has been comprehensive and inclusive, having regard to the adjoining development and constraints of the A47 road. From this process the submitted scheme has emerged and it is considered to be a contextually appropriate, sympathetic and sustainable development in response to the constraints, characteristics and opportunities arising. As such, the proposed development is considered to meet the objectives of the NPPF and relevant policies of the Development Plan insofar as they relate to design.

5.5 Highways and Transport

The NPPF set out its policy requirements in relation to traffic and transport in paras 29 - 41, while JCS policy 6 "Access and Transportation" and BDC Replacement Local Plan (2006) Saved Policies GS2, TRA2, TRA4, TRA5 and TRA8 all set out the local requirements that new developments are expected to meet with regard to traffic and transportation. The primary policy objective is to promote more sustainable transport and to ensure development proposals are capable of being served by safe access to the highway network without detriment to the existing amenity or character of the surrounding area.

A Transport Statement (TRS) supporting the application has been prepared by ASD Engineering. The report has been prepared in accordance with the Department for Transport document Guidance on Transport Assessment (GTA) dated March 2007, which details that for a residential development of between 50 and 80 dwellings a Transport Statement should be produced to accompany a planning application.

Vehicular, cycle and pedestrian access into the site will be provided via the adjacent Wyngates residential development with access onto the surrounding road network then provided by the Wyngates/Yarmouth Road priority junction.
The site is well located to provide good accessibility to the bus services through the village, local amenities, services and primary school. The Table below lists the walking and cycling times from the site to local facilities.

### Travel Times to Local Facilities

<table>
<thead>
<tr>
<th>Facility</th>
<th>Walking Time (Mins)</th>
<th>Cycling Time (Mins)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blofield Day Nursery</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>Football Club/ Public Hall</td>
<td>6</td>
<td>1.5</td>
</tr>
<tr>
<td>Willow Farm Clinic</td>
<td>7</td>
<td>2</td>
</tr>
<tr>
<td>Kings Head Pub</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>Newsagent/Supermarket/ Post Office</td>
<td>9</td>
<td>2</td>
</tr>
<tr>
<td>Library</td>
<td>9</td>
<td>2</td>
</tr>
<tr>
<td>P3rimary School</td>
<td>11</td>
<td>3</td>
</tr>
<tr>
<td>St Andrew &amp; St Peter Church</td>
<td>11</td>
<td>3</td>
</tr>
<tr>
<td>Doctors Surgery</td>
<td>12</td>
<td>3</td>
</tr>
</tbody>
</table>

In promoting more sustainable transport, and providing safe and sensitive access together with appropriate levels of car parking, the proposals accord with national and local planning and highway policies.

The Yarmouth Road carriageway will be narrowed within the vicinity of the Wyngates junction so as to provide a road that is in keeping with its current status. Junction visibility splays of 2.4m x 90m will be provided in accordance with the relevant design guide and as agreed with NCC.

A 4.8m wide Type 3 residential road will be provided within the development leading directly off the existing 5.5m wide access road, leading off the Yarmouth Road, with local carriageway narrowing and a gateway feature provided at the transition point (see TRS drawing 1174/HWY/001-2). As part of the site access works, give way markings will be provided at the junction with Yarmouth Road with visibility provided in accordance with *Manual for Streets* (see TRS drawing 1174/HWY/001-2). It is also proposed that the development roads and the existing Wyngates roads will be subject to a 20 mph speed limit, again as detailed on drawing 1174/HWY/001-2.

Access on to the surrounding road network is provided by the Wyngates/ Yarmouth Road priority junction. The Yarmouth Road measures 7.3m wide adjacent to to site and has street lighting and a 30mph speed limit.

NCC have highlighted the existing width of the Yarmouth Road is greater than than would generally be provided on such a local road and dates back to the time when it was a Principle Road prior to the construction of the A47 dual carriageway. As part of this development therefore it is proposed to narrow the road adjacent to the Wyngates junction (see TRS drawing 1174/HWY/001-2) to provide a route that is more in keeping with its current use and its surroundings.

Car parking and cycle parking on the site will be provided in accordance with NCC’s guidance note “*Parking Standards for Norfolk 2007*”. 

Following analysis of accident data for the highway network in Blofield over a five year period from July 1st 2007 to June 30th 2012 it is concluded there are no significant underlying accident issues on the highway network particularly that would affect pedestrian or cyclist safety. Full details of all the recorded road accidents are provided in the accompanying Transport Statement.

In terms of accessibility to local amenities from the site the study has established there is a good network of footways throughout Blofield with routes to local amenities being along roads with 30mph or 20 mph speed limits (TRS table 4.1). All the amenities are within 12 minutes walking time and three minutes cycling time of the site (TRS tables 4.2 & 4.3).

The site is also well served by bus services with the closest bus stop being found on the Yarmouth Road some 250m distance from the centre of the development site approx three minutes walking distance time. Both bus services that operate to Norwich call at the business parks in Thorpe St Andrew, at Norwich Train Station and Norwich city centre with typical travel times of 15 minutes, 30 minutes and 35 minutes respectively. Details of the bus services available to Norwich and Great Yarmouth are provided in TS Tables 4.5 and 4.6. with full timetables attached as Appendix C to the TS.

The village of Brundall, which provides the nearest rail facility, is located 2.5km to the south of the site with low trafficked roads allowing safe cycle access. Covered stands and lockers to accommodate 12 cycles are provided at the station. Cycling therefore would provide a viable and sustainable means of transport to access local rail facilities. From Brundall direct rail access is provided to Norwich, Great Yarmouth, Lowestoft and the surrounding rail networks that lead on from these stations. TRS table 4.4 illustrates average cycle times to Brundall and the local Business Parks at Thorpe St Andrew while TRS table 4.7 provides details of the train operating times from Brundall Station. A full timetable is included as Appendix D to the TRS.

The development site is within comfortable walking distance from the local primary school and falls well within the recommended maximum distance for children under 8. The direct walking route to the primary school from the site is detailed on drawing 1174/TRA/007.

In terms of secondary education, Blofield falls within the catchment area of Thorpe St Andrew school. This school is found some 9km from Blofield and therefore is outside acceptable walking distance. All of the bus services detailed above operate along the Yarmouth Road in Thorpe and stop close to the A1242 Yarmouth Road/A1042 Ring Road junction such that children would then have a 1km walk to school. Alternatively three school bus services to Thorpe St Andrew High School operate direct from Blofield. Overall the TRS concluded that the development site is well located to provide good pedestrian and cycle accessibility to local amenities and schools in Blofield, while also having good access to public transport services that provide accessibility to surrounding towns and cities.

The application therefore is felt to adequately satisfy all the relevant policy requirements as set out in the Local Plan policies and also the more recently published NPPF, with regard to the general accessibility of the site and the development will help to promote sustainable modes of transport.

5.6 Drainage & Flood Risk

There are a range of policies concerned with the need to address the flood risk of new development and the protection of surface and ground water. Within the NPPF, Section 10 paras 93 to 108 deals with the issue of flood risk together with climate change and
coastal change. Similarly JCS strategy Policies 1 and 3 and BDC Replacement Local Plan (2006) policies GS2 and CS2 sets out the requirements of the LPA with regard to new development and flood risk. One of the main requirements is for new development to be located in Flood Zone 1. A further requirement is the need for a site specific Flood Risk Assessment (FRA), which takes account of future climate change to be undertaken for development proposals of 1 hectare or more. It is also expected that appropriate surface water drainage arrangements for dealing with surface water run off from new development should be provided including, if possible the use of Sustainable Drainage Systems (SuDS).

The FRA accompanying the application assesses the level of flood risk of the proposed residential development and also the impact the site will have on the surrounding area.

It confirms the site lies in Flood Zone 1 and is not at risk from flooding. Anglian Water have also confirmed in a pre-application enquiry that the foul drainage from this development is in the catchment of Whittingham Sewage Treatment Works and that capacity is available for these flows. The sewage network, at present, also has available capacity for gravity flows from the proposed development site. The existing sewer within Wyngates will need to be relaid to a greater depth to facilitate a gravity connection to the sewer in the Yarmouth Road.

Ground conditions at the surface precludes the use of normal shallow soakaways for surface water disposal, but the use of deep borehole soakaways would, if necessary, provide a satisfactory drainage solution, subject to approval from the Environment Agency. Alternatively there is an existing highway drain available within Wyngates providing a positive outlet for the site but with a limited discharge. With the use of oversized pipes and additional off-line storage, and utilising the appropriate SuDS techniques wherever practical, it is possible to deal with the surface water from all impermeable areas.

It is also proposed to address an existing surface water drainage problem which affects the rear gardens of properties along Yarmouth Road by remodelling site levels in that area together with the construction of a French drain along the southern boundary of the site intercepting any residual flows.

The findings, analysis and conclusions of the FRA prove that it is possible to provide a foul and surface water drainage scheme that is fully in accordance with the latest policies on Sustainable Drainage. The proposed development therefore responds to and meets the objectives of the NPPF and specific policies of the Development Plan in relation to flood risk and drainage.

5.7 Ecology

The indications from examination of this site are that there is no evidence that protected species are resident here although a handful of bats feed around the edge of the field and near the site through gardens.

Summer usage by bats can be gauged as “zero”, with evidence suggesting it is just a small-scale feeding area for one or two bats of two common species, and no maternity roost is present, although one was identified some 500 metres to the south.

With regard to winter usage by bats there are no suitable trees with splits or holes on site, or immediately adjacent suitable for hibernating bats and neither are any of the adjacent occupied houses.

There is no evidence of use of the site by Barn Owls or any other Schedule 1 bird.
There was also no evidence to suggest the presence of any other European Protected Species frequently found in the Norfolk countryside, such as Water Voles, Badgers or Great Crested Newts, so no Natural England licence will be necessary in order to proceed with any development, neither would any planning restrictions be expected to be applied by the LPA in relation to any wildlife species conditions.

The surveys and resultant report has subsequently shown that this site follows a path on the Natural England flow-chart, Box 2 (see Appendix 4) of (i)>(iii)>(iv)>(viii) >(xiii), with the LPA to decide if the survey is considered adequate, means the application can proceed.

Wildlife mitigation at this site should primarily take the form of an imaginative planting scheme containing native species and those known to be good to Biodiversity as most wildlife species in this area are associated with the gardens rather than the open arable area. While an array of artificial wildlife boxes should be added to the site as Biodiversity enhancement.

The report recommends that, as there is evidence of former use by some nesting birds in the hedge area near the southern entrance, any preparatory work here should be carried out before the spring and summer bird breeding period starts or, if the project has to start during the spring and summer, that a careful check is carried out prior to work commencing and any areas with active bird nests avoided until the baby birds have departed from the nest.

The surveys and report serve to fully informs the planning process that this is a low biodiversity site which can only be improved by the landscaping and open spaces proposed as part of the development.

5.8 Trees & Landscape Features

The proposed development has been designed to ensure characteristic landscape features are retained and where the removal of any trees is required replacement planting of appropriate species will be carried out on suitable locations within the site.

The policies concerned with the protection of the surrounding landscape include JCS Policy 1 and BDC Replacement Local Plan (2006) Saved Policies GS4, ENV2 and ENV3. In addition the NPPF in para 17 identifies among its 12 core principles the need for planing to conserve and enhance the natural environment. Paragraphs 105 -125 set out the ways in which planning could and should help to conserve the natural environment including;

- protecting and enhancing valued landscapes
- minimising impacts on biodiversity and providing net gains in biodiversity wherever possible

The Arboricultural Impact Assessment (AIA) accompanying the application involved a detailed survey of all the trees within the site and assesses the likely impact of the proposed development of 64 dwellings may have on them. The AIA also provides recommendations for the protection of trees during construction.

The site does not lie within a Conservation Area and none of the trees within the
application site are covered by a Tree Preservation Order (TPO) although an area of woodland adjoining the western boundary is the subject of a Woodland Order.

The bulk of existing trees are found along the western boundary of the site which is an area of mixed woodland consisting largely of broadleaves such as Oak, Sycamore and Ash. The boundary between the site and the woodland consists largely of Hawthorn and Myrobalan Plum. Along the southern boundary of the site are residential properties with some small ornamental trees. On the eastern boundary with Wyngates there are a small number of mature boundary trees, predominantly Oak although one large Sycamore is also present. There are a further three mature boundary Oak trees on the northern edge of the site. Surrounding the entrance to the site from Wyngates is a small area of scrub which includes several small self sown Sycamore.

A Tree Constraints Plan (TCP) is included within the AIA as a basis for the assessment of the constraints imposed by existing trees on the proposed design. The report categorises the trees into three groups A and B being trees of high quality and amenity value and therefore must be retained as part of the development. Category C trees are of poorer quality and have lesser landscape/amenity and can be removed if necessary. Replacement planting will be carried out within the site in more appropriate locations as part of the development. Where Category C trees are retained they will be afforded the same protection during construction as trees falling within category A & B.

Overall the AIA concludes that all category A & B trees can be retained and protected as part of the development. Recommendations are made with regard to pre-emptive root pruning where some of the garages along the western boundary encroach within the root protection area of woodland G1 and Oak T2. Some shading is likely to occur to proposed dwellings along the western edge of the site and this should be taken into account in terms of the detailed design and layout of the properties.

Only one category C tree is required to be removed as part of the development. This can be replaced with a mixture of trees that will quickly more than replace any lost biomass or visual amenity.

5.9 Noise Assessment

The site lies adjacent the A47 and is therefore affected by road traffic noise from this busy dual carriageway which acts as the main link road between Great Yarmouth and Norwich. National and Local Development Plan policies seek to minimise noise impacts on new development proposals. In keeping with the policy guidance contained within the NPPF section 11 and also Local Plan policy CS14 due regard has been given to the likely impact of noise from the A47 on the proposed dwellings. The issue of noise was looked at in the early stages of developing the proposal and has played a major part in determining the layout of the site. A full Noise Assessment has therefore been carried out for the development and accompanies this application.

The Noise Assessment identifies the northern part of the site as the critical area where the site lies closest to the A47. A section of this northern area particularly the north eastern corner will be exposed to noise levels slightly in excess of acceptable limits. It was therefore decided to allocate a large portion, just under 2 ha., of the northern part of the application site as open space. This will help to act as a noise buffer between the A47 and the proposed dwellings. As explained elsewhere in the report the layout of the open space will be the subject of further discussion between the applicants and BDC and Blofield PC. There is however the possibility that some of this open space will have additional planting which will enhance its role as a noise buffer and help to further reduce the impact of traffic noise on the development.
As the site does not share a boundary directly with the A47 and a further area of land, also not in the applicants ownership, lies between the application site and the A47 it is not possible to provide a noise screen or buffer directly adjacent to the A47. The report recommends therefore, the only practical noise mitigation method to allow acceptable internal noise levels to be achieved within habitable rooms is the provision of adequate sound insulation of the building envelope. The sound insulation provided by standard thermal double glazing will allow these internal noise targets to be met when windows are closed. An alternative ventilation system will be required for those rooms which rely on closed windows to achieve the internal noise levels.

With regard to the most northern row of dwellings, plots 42-48, which front onto the open space these properties will require an alternative method of ventilation for the windows on the north facing facade at both ground and first floor level. Additionally the report recommends that at first floor level, an alternative method of ventilation will be required in those houses which have windows that would otherwise be exposed to noise levels above the acceptable noise limits in the night time. This will include plots 49-51 and 58-59. However, the houses will be constructed with have mechanical ventilation and heat exchangers, so vents are not required.

5.10 Archaeology

The NPPF, in paragraph 128, places a requirement on LPA’s to request applicants on sites on which development is proposed and includes or has the potential to include heritage assets with archaeological interest to submit an appropriate desk-based assessment and where necessary a field evaluation. On a more local scale JC1 requires new development to safeguard environmental and heritage assets including archaeological assets. Similarly Replacement Local Plan Policy ENV20 states that development proposals that appear to raise archaeological issues should be subject to evaluation of their archaeological significance. Any planning permission granted will be subject to appropriate conditions.

In keeping with these policy requirements a full Archaeological Desk Based Assessment was undertaken of the site in November 2012 by NPS Archaeology and their report accompanies the application. Their findings show that apart from some post-medieval pottery found within the boundary of the development site there is sparse evidence of remains of any period in the general vicinity. It is most likely that the pottery was introduced to the site during manuring or spreading nightsoil, rather than being evidence for activity or occupation here. The historic maps support this; little development is shown to have occurred here for many centuries and small fields have gradually been combined to form one large field.

These findings have been confirmed by NHES who state that the archaeological potential of the site is low and in view of this no further archaeological work is required.

5.11 Sustainable Construction/Energy Efficiency

In line with the JCS Policy 1 (Addressing Climate Change and Protecting Environmental Assets) and Policy 3 (Energy and Water), the design of the proposed development has sought to take all viable and practical steps to maximise opportunities for sustainable construction and to reduce energy use. To meet these requirements, the following features are incorporated into the design:

Energy Efficiency

- High performance thermal elements, including one of the most energy efficient blocks available coupled with a 125mm cavity fully filled with insulation to
minimise the heat loss through external elements

- Provision of a SEDBUK ‘A’ rated gas boiler and efficient hot water cylinder to each dwelling
- Low energy lighting throughout wherever possible. External lighting will be fitted with daylight and/or motion sensors
- Low flow and efficient sanitary ware will be specified to reduce household water consumption to 105 litres/person/day
- Provision of water butts to each dwelling to reduce potable water use externally
- Air tight construction to minimise heat loss whilst maximising the performance of the mechanical ventilation system where applicable
- The heat recovery element of the mechanical ventilation system reduces the demand on the heating system and therefore significantly reduces running costs and energy consumption
- Further information on the efficient use of the home and appliances is provided within the Home User Guide.

Sustainable Construction

- Promotion of sustainable transport use through the provision of cycle storage and information on public transport and local amenities within the Home User Guide
- Use of sustainable, responsibly sourced materials; assessed using Green Guide ratings and suppliers participating in responsible sourcing schemes equivalent to BRE BES 6001:2008 Responsible Sourcing Standard
- Protection of existing ecological features and biodiversity enhancement through native planting and habitat creation
- Responsible management of the impact of the development through adherence to the Considerate Constructor’s Scheme to a score of at least 24, employment of a comprehensive Site Waste Management Plan and procedures to minimise construction site impacts during construction
- All dwellings will be constructed to meet Code level 3 of the Code for Sustainable Homes and have been designed to meet Lifetime Homes standard where possible, given other regulatory constraints to be complied with.

Building for Life

- The applicants seek to evaluate its developments against the Building for Life criteria published by CABE. A new ‘Building for Life 12’ system was introduced in September 2012, with a traffic light scoring system. The applicants and their consultants have sought to specifically address the Building for Life criteria used to evaluate the quality of new development proposed. To influence and evaluate the proposed scheme, the applicants undertook their own assessment, which is appended to this statement (Appendix C). The assessment concludes that the proposed development achieves ‘green lights’ in all criteria under Building for Life 12.
5.12 Community Involvement

In accordance with section 122 of the Localism Act 2011 (although not yet in force at the time of writing) and Broadland District Council’s Community Involvement Protocol, the applicants have consulted with the local community, together with statutory and other consultees, and the District Council.

Consultations with Technical Stakeholders & Service Providers

Throughout the process of preparing this application for planning permission, various statutory consultees have been approached and informed of this proposed development. Significant dialogue has occurred in association with the technical studies that have been undertaken and now accompany this application. The organisations consulted as part of the pre-application process and preparation of this detailed planning application include:

- Norfolk County Council – Highways
- Norfolk County Council – Planning Obligations
- Anglian Water
- Environment Agency
- Norfolk Historic Environment Service
- Broadland District Council – Planning Department
- Broadland District Council – Environmental Health Department
- Broadland District Council – Housing Department
- Utilities Providers

Consultation with the Local Community

Blofield Parish Council were the first point of local contact in November 2012 to outline the public consultation process for the future planning application. Briefing information was also supplied to the local ward members of Broadland District Council.

The following activities were undertake:

- The site was introduced on the Norfolk Homes website during week of 5th December 2012.
- Advertisements were published on two occasions, 11 and 14 December 2012 in the Eastern Daily Press advising of the proposed development and the forthcoming public exhibition.
- Over 600 leaflets were delivered to homes in the village during the week of 5th December 2012. These gave details of the public exhibition and also the website address for viewing information on the proposed homes.
- Details were included on the Blofield Parish Council website for the public exhibition and the link to the Norfolk Homes website.
- Public exhibition held at Blofield Court House on Monday 17th December 2012 between 4 - 8pm, attended by representative from Norfolk Homes, the architect and the planning consultant. The information available included a preliminary sketch layout and various other plans and visual aids. Approximately 60 residents
attended this event.

- Presentation made to Blofield Parish Council meeting on Monday 14th January 2013, again attended by representative from Norfolk Homes, the architect and planning consultant. This again was advertised on the Blofield Parish Council website.

Subsequent to these we were invited by some residents on Yarmouth Road who adjoin the site to view it from their properties and gardens with particular reference to the difference in ground levels between the existing properties and those proposed on the site, plus a discussion on existing land drainage/flooding problems and how these would be alleviated by the proposed housing scheme.

A further meeting was held with some of the residents of Manor Ridge to discuss the emerging layout of the site in more detail, particularly how the housing area, especially Plot 43, related to their properties and also the options available for boundary treatment between the public open space and their rear gardens.

Residents in Wyngates have also remained in contact via the phone and email to keep up to-date on when a revised layout drawing would be available following the public meetings.

**Liaison with Broadland District Council**

A Screening Opinion request under the Environmental Impact Assessment Regulations was submitted to Broadland District Council on 4 December 2012, this contained a description of the proposed development and identification of the most likely issues to be encountered. The decision that an Environmental Impact Assessment was not necessary was received on 11 January 2013, following consultation with various consultees by the Council.

A pre-application meeting for informal discussion of the proposal was held with the Development Control officer from Broadland District Council on 13 February 2013.

Consultation has also been held with the Council's housing department to establish the tenure mix and size of affordable dwellings to meet the needs of Blofield and surrounding area.
6 Conclusions

Norfolk Homes Ltd is making this application for detailed planning permission for the construction of 64 one, two, three and four bedroom dwellings, 21 of which are affordable homes. Public open space is provided both within the site and adjoining as a larger area of Public Open Space, comprising 1.99 hectares (4.92 acres) in total.

The housing scheme is on land that has been identified in the SA DPD process as an alternative location in the Council's 'Site Allocations – Alternative Sites for Development Potential' in August 2012. The development is proposed within the context of the latest Government policy contained within the NPPF, un-remitted policies of the JCS and relevant saved policies of the adopted Local Plan.

The process of assessment, involvement, evaluation and design for the proposed erection of 64 dwellings, vehicular accesses, open space and associated works on land off Wyngates, Blofield. From this process has emerged what the applicant considers to be a contextually appropriate, sympathetic and sustainable development, having regard to the constraints, characteristics and opportunities presented by this site and its surroundings. In particular it has sought to address the issues raised during extensive pre-application and community consultation, together with the relevant policy requirements of the Development Plan and the National Planning Policy Framework.

In light of the above and the range of information and evidence accompanying and supporting this application, the applicants consider these proposals to be appropriate within the planning policy context. Account must also be given to other material considerations; Blofield is a sustainable location for new development; there is not a five year supply of housing land in the NPA and this development will contribute towards the shortfall in supply while also providing affordable housing; provision of open space in excess of the policy minimum requirements. It is considered that all of these items are sufficient enough to justify approving the application now and in advance of the adoption of the SA DPD and other applications currently before the Council for determination.