NORFOLK HOMES LTD : LAND AT WYNGATES, YARMOUTH ROAD, BLOFIELD, NORFOLK

PINS Ref: APP/K2610/A/13/2198950

PROOF OF EVIDENCE OF SIMON WHEATMAN BSc (HONS) MRTP
1. Introduction

1.1. My name is Simon Wheatman. I am a qualified town planner, having a degree in Environmental Planning. I have been a chartered member of the Royal Town Planning Institute since 1984 and I am the Managing Director of Wheatman Planning Limited based in Norfolk.

1.2. I have been Managing Director of Wheatman Planning since July 1997. Prior to this I held planning posts in public and private sectors, being a Director of Carpenter Planning Limited between 1991 and 1997 based in Norwich, senior planner with Peter PC Allen from 1989 to 1991 based in Edinburgh and Norwich, and local government posts in development control and local plans in the London Borough of Tower Hamlets and Waveney District Council between 1982 and 1989. At the latter authority I was responsible for the preparation of local plans.

1.3. My extensive experience over the last 24 years as a consultant has included advising developer and land owners in the delivery of housing schemes in the East of England. I am very familiar with Broadland District and the area covered by the Norwich Policy Area.
2. Site and Surroundings Context

2.1. The proposed development comprises a site of some 4.44ha. of arable land, located adjacent to the northern settlement boundary of Blofield.

2.2. The site is well contained within the built-up area of Blofield, with the part of the site for the proposed houses being surrounded on three sides by existing properties. To the north there is a small field before the A47 dual carriageway which immediately to the east of the site goes into a cutting (east to west).

2.3. To the east the site adjoins the existing Wyngates development.

2.4. To the west is an area of trees and beyond for part is an area being developed for a small group of houses.

2.5. To the south are existing properties on Yarmouth Road, a mixture of two storey houses, chalet bungalow and bungalows.

2.6. To the north of the proposed housing area is the proposed Public Open Space, which adjoins a field (forming part of a currently pending planning application for residential development and open space). To the north of this area is the A47 which separates the site from the wider countryside to the north.

2.7. The site generally has site levels around 25mAOD, with a gentle slope southwards decreasing by around 600mm until close to the southern boundary where the gradient increases to a local low point of 23.75mAOD.

2.8. Blofield has many buildings of late Georgian and early Victorian styles. There are several examples of residential dwellings of these styles in the area of Yarmouth Road, Doctors Road and North Road which are all relatively close to the application site. To the south of the appeal site there is a large area of late twentieth century development.

2.9. Access to facilities within the existing settlement is a key objective to encourage both their use and also to encourage the use of other means of transport other than the private car. The Appendix 1 illustrates the position of the site in relation to the wider context of the village and the local facilities and the information on distances and travel times by walking and cycling are also given in the Appendix. It is an objective of good planning to dovetail a new development into the fabric of an existing settlement, particularly where permeability of movement is concerned from the existing to the new.

2.10. The site is well located to local roads, existing residential development and local
facilities. Overall the site is considered to be well connected to the existing urban area.
3. Relevant Planning Policies

3.1. Section 38 (6) of the Planning and Compensation Act 2004 is relevant to the determination of the appeal proposals and states:

“If regard is to be had to the development plan for the purposes of any determination to be made under the Planning Acts the determination must be in accordance with the plan unless material considerations indicate otherwise.”

3.2. This is repeated in paragraph 210 of the NPPF.

3.3. The starting point for determination of this appeal is therefore the Development Plan for the area covering the appeal site, this comprises of the following:

- Adopted Greater Norwich Development Partnership Local Development Framework, Joint Core Strategy (JCS), 2011
- Adopted and 'saved' policies of the Broadland Local Plan (Replacement), 2006

Joint Core Strategy, 2011

3.4. The Joint Core Strategy (JCS) which includes the Norwich Policy Area (NPS) was adopted by the constituent Councils in March 2011. Although weight should be attached to the policies contained in the JCS, a High Court challenge to the growth options within the Broadland part of the NPA has resulted in the relevant policies being remitted and treated as not being adopted. I discuss the significance of this later in the Proof of Evidence.

3.5. The reasons for refusal are unclear and do not indicate clearly which policies are said to be breached by the appeal proposal. The appellants therefore asked the Council to state which policies the proposed development is alleged to contravene in relation to the reasons for refusal. The Council have stated that JCS Policies 7, 9 and 14 are relevant. I deal with each of these policies elsewhere in this evidence and summarised below.

3.6. In respect of Policy 7, the appeal proposals support the existing community by providing affordable housing, and open space for play and recreation to help meet a deficiency in provision. Additionally, the existing commercial services within the village will be enhanced by the increase income from the spend by the residents, and the County Council have confirmed the existing primary school can be expanded to accommodate the additional growth. Financial contributions, now through the Community Infrastructure Levy, would also be provided for the library. The pace of development within the village would gradually occur at a rate of 30 – 40 dwellings per year and therefore capable of being
assimilated into the community and given every opportunity to strengthen community cohesion at this rate of development.

3.7. With regard to Policy 9, it should be borne in mind that the distribution of housing and the strategy for growth within the Broadland part of the NPA is currently remitted and treated as not being adopted. Notwithstanding the relevant part of the policy being remitted, the appellants assert that the proposed development would be within the range of developments proposed and not offend the settlement hierarchy. In respect of Policy 14, the appeal proposals would result in an appropriate amount of development within Blofield and commensurate with the settlement's function as a Key Service Centre.

3.8. While the Council have, subsequent to the refusal notice, been able to identify the the JCS policies they believe to be at issue, the following are also considered relevant to the appeal proposal:

Policy 1: Addressing climate change and protecting environmental assets
Policy 2: Promoting Good Design
Policy 3: Energy and Water
Policy 4: Housing Delivery
Policy 6: Access and Transportation
Policy 7: Supporting Communities
Policy 8: Culture, Leisure and the Environment
Policy 12: The remainder of the Norwich urban area, including the fringe parishes
Policy 13: Main Towns
Policy 18: The Broads
Policy 20: Implementation

The Broadland Local Plan (Replacement), 2006

3.9. The Broadland Local Plan (Replacement) was adopted in 2006 (RPL). The policies contained in this document were formulated having regard to the now historic Government guidance that pre-dates the National Planning Policy Framework (NPPF).

3.10. The Council have identified the following saved RPL policies are relevant to the determination of this appeal:
3.11. The reasons for refusal do not quote any of these policies as they are of limited relevance. The RPL only makes provision for the period up to June 2011 and the Plan is therefore out of date in terms of the scale and location of new housing allocations; it has also been largely superseded by the adoption of the JCS.

3.12. In respect of controlling development outside the defined boundaries to settlements, the Council have agreed that because of the lack of a 5 year housing land supply Policy HOU1 is out of date. It therefore follows that Policy GS1, which repeats the requirement for development to be within the settlement boundaries, is also out of date. Likewise, Policy HOU7, which conversely limits development outside of the settlement limits to the usual exceptions agricultural, forestry and tourism needs, can be considered out of date in respect of the proposed development.

3.13. The appeal proposal is considered to conform with the general thrust of Policy HOU6 in respect of the form and character of the settlement, also being well served by public transport and close to a range of existing facilities and services. However, the location requirement for development within the settlement limits is again out of date.

3.14. Turning to considerations relating to the detailed layout and design of the proposal, in respect of Policy ENV2, design is not included as a reason for refusal. An arboricultural
assessment and ecology survey accompanied the application. There were no objections on these issues and the proposal is considered to comply with Policy ENV5.

3.15. In respect of Policy ENV20, an archaeological geophysical survey was undertaken on the site and did not identify any heritage assets, therefore no further work is required.

3.16. Policy ENV23 is concerned with the availability of, or adverse impact on, water resources. The Environment Agency has not raised any objections and the proposal is therefore considered to be in accordance with this policy.

3.17. Policy TRA2 in respect of submission of an appropriate transport assessment is not relevant as the appeal proposal falls below the threshold of 100 dwellings normally adopted, however a transport statement did accompany the application. Provision for pedestrians is included in the proposals, together with links to services and public transport, all in accordance with Policy TRA4. Car parking is included in the scheme, meeting the requirements of Policy TR8.

3.18. In respect of TRA14, not permitting development where highway safety or the satisfactory functioning of the local highway network would be endangered, the appeal proposal has not received any objections from the Highway Authority or the Highway Agency (in respect of the A47 Trunk Road).

3.19. Public open space is proposed as part of the development in excess of the standard set out in Policies RL5 and RL7. Provision for future maintenance is also proposed as part of the section 106 obligation in accordance with Policies ENV3 and RL7.

3.20. Policy CS14 relates to noise being taken into account in determining planning applications. A noise assessment was submitted with the application and the recommendations incorporated into the detailed scheme of design and layout. There were no objections to the proposed development on the basis of noise from the A47 road.

**Government Guidance – The National Planning Policy Framework**

3.21. The Government published the National Planning Policy Framework (NPPF) on 27 March 2012, replacing all previous guidance in the form of Planning Policy Statements and Guidance Notes. This document sets out the Government's current planning policies for England and how these are expected to be applied (see paragraph 1 of the NPPF). The NPPF seeks to promote sustainable development.

3.22. The appeal proposals generally accord with the guidance of the NPPF for the following reasons:
° The appeal site is not within a National Park or other sensitive landscape area (see paragraph 115 of the Framework);

° The appeal site is not within a Green Belt (see paragraphs 17 and 89 of the Framework);

° The appeal site is not within a Special Protection Area, Special Area of Conservation, Ramsar site or other area of ecological interest (see paragraph 118 of the Framework);

° The appeal site is not within an area of Special Scientific Interest (see paragraph 118 of the Framework);

° The appeal site is not within a Conservation Area (see paragraph 137 of the Framework);

° There are no listed buildings within the appeal site (see paragraph 132 of the Framework);

° The scheme has been designed to take account of the noise levels affecting a small part of the site (see paragraph 123 of the Framework);

° The appeal site is surrounded on three sides by the existing urban area (see paragraph 17 of the Framework);

° The appeal site is served by existing local shops and services and the development would support the vitality of the village (see paragraph 37 of the Framework);

° The appeal site is not contaminated land (see paragraph 109 of the Framework);

° There are no safeguarded mineral reserves within the appeal site worthy of commercial or practical working and no objection was received from the Mineral Planning Authority (see paragraph 114 of the Framework);

° The appeal site is well related to existing employment within the village and in close proximity to one of the main Norwich business parks (see paragraph 17 and 37 of the Framework);

° The appeal site is not within the functional flood plain (see paragraph 100 of the Framework);
○ The appeal site is well related to existing public transport routes (see paragraph 35 of the Framework);

○ No harm to biodiversity interests will result from the proposals (see paragraph 109 of the Framework);

○ Good design is able to be achieved (see paragraphs 17 and 57 of the Framework); and

○ The appeal site is in close proximity to existing schools, medical centres, places of worship, sports venues and a public house. It would also help to address the identified deficiency in public open space within the village (see paragraph 70 of the Framework).

3.23. At the detailed level the appeal proposal further accords with the NPPF for the reasons set out below.

3.24. Paragraph 14 of the NPPF states:

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking... ...For decision-taking this means:

○ Approving development proposals that accord with the development plan [where relevant having regard to paragraph 215] without delay; and

○ Where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless:

    - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

    - Specific policies in this Framework indicate development should be restricted.”

3.25. From this it is clear that the appeal should be allowed and planning permission granted unless it is clearly demonstrated that:

○ The proposals are not sustainable;

○ There is a conflict with policies of the Development Plan where they remain in
accordance with the NPPF; or

- The benefits of approving the scheme are outweighed by adverse impacts.

3.26. The benefits of the appeal proposals are set out in Section 5 of this Proof of Evidence.

3.27. Paragraph 7 of the NPPF seeks to define what is meant by sustainable development and identifies three dimensions; economic, social and environmental. I set out in Section 4 of this Proof of Evidence the reasons why the development is considered to be sustainable.

3.28. Paragraph 47 of the NPPF relates to delivering a wide choice of homes and is also relevant. It states:

- Use their evidence base to ensure that their Local Plan meets in 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 this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;

- Identify and 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, local planning authorities 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;

- Identify a supply of specific, developable sites or broad locations for growth, for 6-10 years and, where possible, for years 11-15;

- For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and Set out their own approach to housing density to reflect local circumstances.

3.29. Paragraph 49 of the NPPF goes on to state that housing applications should be considered in the context of the presumption in favour of sustainable development. Furthermore, development plan 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 sites.

3.30. I set out in Section 4 of this Proof of Evidence the agreed position with the Council concerning the deficiency in the 5 year housing land supply and why an additional 20% buffer should be added to the 5 year land supply.
4. **The Case for the Appellant**

4.1. I have reviewed the reasons for refusal and have identified what I believe are the key issues for the appeal. They are:

- is there a shortfall in the NPPF requirement for a five year housing land supply
- is Blofield a sustainable settlement suitable for further housing development
- does the appeal site represent an appropriate site for development
- what are the impacts of additional growth in Blofield, above the JCS allocation of "approximately 50" dwellings plus additional development from the "smaller sites in the NPA" allowance
- would the development of the appeal site be premature to the emerging Development Plan

**Issue 1 – Is there a shortfall in the requirement for a 5 year housing land supply in the Norwich Policy Area?**

**5 Year Housing Land Supply**

4.2. In respect of the housing requirement of the JCS, a minimum of 33,000 new dwellings in the period 2008 – 2026, of which 21,000 should come forward by way of additional allocations under Policy 9 of the JCS. This is expressed as an annual requirement of 1,825 units throughout the NPA.

4.3. Prior to the Examination into the remitted parts of the JCS, held in May and July 2013, the most up to-date housing land supply figures for the NPA were contained in the Joint Core Strategy for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2011 – 2012 (AMR 2011 – 2012). Appendix A contains the published assessment.

4.4. Page 18, paragraph 4.6.1 of the AMR 2011 – 2012 states that in the GN PD area as a whole the annual target for housing completions has consistently not been achieved since the base date of the JCS (April 2008). This is a similar situation for the NPA, paragraph 4.6.3 states:

“Completions in the Norwich Policy Area have followed a similar pattern to those in the GN PD area as a whole. The actual target (1,825) has not been achieved since the base date of the JCS (April 2008) with completions falling considerably below target (2008/09: -35%, 2009/10: -49%, 2010/11: -50% and 2011/12: -50%). ”
4.5. Paragraph 4.6.2 of the AMR 2011-2012 states that over the remainder of the plan period annual housing completions will have to increase to meet the overall JCS target of 37,500 new homes. The AMR does not indicate how this will be achieved. Indeed, the trajectory and housing land supply project contained in Annex A to the AMR 2011–2012 illustrates that even with increased completion rates within the 5 years 2013/14 – 2017/18 the shortfall would increase from 3,359 to 3,483 over the same period. Interestingly, the methodology used for these calculations has been to take the available and suitable land and assess what would be achievable by the site owner/developer when the market demand increases to more typical rates. Even including ‘suitable’ land without the benefit of planning permission the delivery makes no inroads into the deficiency.

4.6. The authors of the AMR 2011 – 2012 consider that once new site allocations are made to accommodate the planned levels of growth, levels of delivery will significantly increase, but no explanation is provided as to why this should suddenly occur (Appendix A, paragraph 10).

4.7. The trajectory for the NPA contained in the AMR 2011 – 2012 projects 7,357 units being delivered in the 2013/14 – 2017/18 period. The JCS requirement with the minimum 5% buffer is 9,581 units. The 5 year housing land supply based on these figures for the NPA is 3.8 years.

4.8. Subsequent to the publication of the AMR 2011 – 2012 there has been a further examination of the situation concerning the 5 year housing land supply. Firstly the Blofield appeal decision in March 2013 (Appendix 2) where both parties agreed there was not a 5 years supply of housing land (paragraph 15). At the time of the Inquiry the data used related to the AMR for 2010 – 2011, this identified a supply of 3.28 years which represented a shortfall of 3,411 dwellings. The Inspector considered a 20% buffer would be appropriate due to the persistent under delivery of housing, which gave a supply of only 2.74 years.

4.9. Secondly, in May and July 2013 the reconvened examination into the remitted parts of the JCS has been a matter of much debate. Evidence\textsuperscript{1} presented to the Examination by the GNDP suggested that the current position for land supply for the whole NPA is 4.58\textsuperscript{2} years, a shortfall of 1,448 dwellings (as at 31 March 2013); the supply in the Broadland part of the NPA being 2.24 years. These figures include a 5% buffer that the GNDP and the constituent LPAs consider to be appropriate.

4.10. Evidence\textsuperscript{3} presented to the Examination by Barton Willmore, acting on behalf of

\textsuperscript{1} GNDP Paper on Housing in response to the Inspector's letter of 24 May 2013 (JCS Examination Document DV21)
\textsuperscript{2} This figure is considered to be a miscalculation and should read 4.36 yrs (9,870/11,318 x 5yrs = 4.36)
\textsuperscript{3} Statement Responding to Additional Information submitted on 21 June 2013, Barton Willmore (JCS Examination Document DV32)
objectors, calculated the shortfall in provision since the start of the JCS in 2008 to March 2013 has now risen to 4,303 dwellings. Using the Sedgefield method and applying a 20% buffer they considered the housing land supply to equate to 3.06 years.

4.11. Finally, a section 78 appeal in respect of a housing development proposal on land at the Lakenham Cricket Ground, Norwich (PINS ref: APP/G2625/A/13/2195084). At the time of writing this appeal is undetermined but evidence presented by the appellants considered that applying the 'Sedgefield' approach and the 20% buffer, this gives the NPA, at best, a 2.54 year supply of deliverable housing land, while the LPA's analysis, Norwich City Council, believe there to be a deficiency in the NPA, with only 4.15 years supply, applying a 5% buffer and the 'Liverpool' approach to the shortfall; I will discuss the 'Sedgefield' and 'Liverpool' approaches and the matter of a 5% or 20% buffer later in my evidence.

4.12. In respect of the current appeal the District Council advised in its 30th August e-mail that:

“The GNDP Paper on Housing in response to the Inspector’s letter of 24 May 2013 provides updated information on housing land supply. At 31 March 2013, the published figure plus the 5% requirement for the Norwich Policy Area is 4.58 years and 2.24 years for the Broadland part of the Norwich Policy Area.”

4.13. In such circumstances paragraph 49 of the NPPF states that a local plan cannot be considered up-to-date. Paragraph 47 requires local planning authorities to ensure that their local plans meet “.... the full, objectively assessed needs for market and affordable housing in the housing market area”. The 2006 LP is not consistent with the requirements of the NPPF and should therefore not be afforded any weight in the decision making process.

Persistent Under Delivery of Housing Sites

4.14. Given that the intention behind paragraph 47 of the NPPF is to significantly boost the supply of housing, I am of the opinion that the GNDP Councils have failed to maintain a 5 year supply of deliverable housing sites in the NPA. This view is confirmed in the Appendix A of the AMR 2011 – 2012, paragraph 12 (extract included in Appendix 3 of this Proof).

4.15. At the EIP held into the draft JCS in 2010 the GNDP produced the document at Appendix 4 to this Proof – “Five Year Supply of Housing Assessment” with a base date of 1 April 2009. At paragraph 5 of that document is a table setting out performance against the EEP requirements over the fifteen year period from 2001 to 2015. It can be seen from the table that in only one year – 2007/08 the completions exceed requirements. This, along with the projected completions up to 2015 from the same table, clearly demonstrates a record of
persistent under delivery even during a buoyant housing market period.

4.16. The position in the EIP table can be compared with Appendix 9 of the GNDP Paper on Housing in response to the Inspector’s letter of 24 May 2013, produced for the re-convened JCS Examination (see Appendix 5 of this Proof of Evidence) into the Broadland part of the Norwich Policy Area. Appendix 9 of this document shows the same completion figures but measures performance against the previous Norfolk Structure Plan annualised target of 1194 dwellings per annum from 2000 to 2008, after which the EEP annualised figure of 1650 is adopted for 2008-2011, against which to measure completions. This appears to make the performance appear to have produced a surplus of completions over requirements. The EEP however, produced housing requirements for the period 2001 to 2021, as set out at paragraph 2 of the document at Appendix 6 to this evidence, and it is therefore evident that during the preparation of the JCS, it is the EEP figures, and not those of the now defunct Norfolk Structure Plan for which land supply had to be made. Therefore it is demonstrated that there remains a persistent under delivery of housing sites within the NPA.

4.17. Paragraph 47 of the NPPF requires LPAs to apply an additional buffer of 5% to ensure choice and competition in the market for land. However, where there has been a persistent under delivery of housing land, the paragraph continues:

“.... local planning authorities 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.”

4.18. The 20% buffer has not been allowed for by the GNDP Council's in their housing land supply calculations contained in the AMR 2011-2012 or their evidence to the re-convened JCS Examination.

4.19. The NPPF does not set a time-frame in which to form an assessment of “persistent under delivery”, however, the Inspectors in the Costessey and Blofield appeals considered the period since the JCS started, 2008, as being appropriate. The evidence of Barton Willmore to the JCS Examination responded to the GNDP document DV21, this contains an assessment of the delivery record over the last 12 years, cutting across a range of economic cycles and housing delivery requirements. This evidence contained in Appendix 7 to this Proof, demonstrates that in only 2 years since 2001 has the NPA met its annual requirement.

4.20. On this basis it can be concluded that a persistent under delivery of housing

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5  Barton Willmore Paper to JCS Examination (JCS Examination Document DV32)
completions is evident, and the NPPF buffer of 20% should be applied to ‘provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land’.

4.21. The fact that a 20% buffer should apply is further confirmed in recent appeal decisions by the Planning Inspectorate. The first is the Town House, Costessey appeal (APP/L2630/A/12/2170575) decision in August 2012 (Appendix 8 of this Proof) that confirmed in paragraph 7:

“Over the 3 years since the JCS commenced there has been an under delivery in relation to requirements. The annual Monitoring Report attributes this to the economic situation and also on the fact that local plans were drawn up on the basis of a lower Structure Plan target. However it would appear that even before that the NPA local authorities were failing to deliver the housing that was required.” (My emphasis)

4.22. With a buffer of 5% included in the LPA’s figures for this appeal, the Inspector concluded that:

 “… as a 3.13 year supply is a very serious shortfall indeed it seems unnecessary for me to conclude on whether a higher buffer should be applied in this case.” (Paragraph 7)

4.23. This position regarding the higher buffer featured in the recent Blofield appeal where the Inspector was very clear in his conclusions that there was a history of persistent under delivery, stating:

“The AMR refers to the effects of the slow housing market and that, prior to the adoption of the JCS, local plans had previously made housing allocations on the basis of figures in the Norfolk Structure Plan, which were lower than those in the JCS. Nevertheless there has been a persistent under delivery of housing. Accordingly I have reached the view that a buffer of 20% should be applied (Paragraph 44),

4.24. On the strength of the above evidence I conclude that a record of persistent under delivery of housing completions is evident and the NPPF buffer of 20% should be applied.

Making good the shortfall in delivery – Liverpool or Sedgefield approach?

4.25. The NPPF (Section 6) sets out the Government’s aims for the delivery of a choice of high quality homes. The Framework seeks to achieve a significant increase in housing delivery, including measures to promote a more responsive and flexible supply of housing land. The 5 year housing land supply is one of the key methods that the NPPF tries to deliver housing provision and the buffer is an effort to boost the supply of land for housing.
4.26. It is therefore vital that any shortfall in housing land supply should be made-up expediently rather than delaying and compounding under performance to late in the plan period when unreasonable levels of housing requirement would result to meet the targets.

4.27. There are two methods for dealing with shortfalls; the inclusion of the shortfall within the current 5 year period is known as the ‘Sedgefield’ method, as opposed to spreading the shortfall over the remaining years of the local plan, known as the ‘Liverpool’ method.

4.28. In order to establish the correct method for calculating housing land supply in the NPA I have examined two further appeal decisions which are pertinent to how this matter should be considered.

4.29. The first appeal decision issued in August 2012 relates to land at Honeybourne, Worcestershire (the Wychavon decision) (APP/H1840/A/12/2171339). A copy of this decision appears at Appendix 9 of this Proof.

4.30. In this decision the Inspector found that the Council had relied upon saved policies to refuse planning applications. The Inspector found this approach to be in direct conflict with the advice in the former PPS3 (2006) which sought to bring about a step change in housing land supply. He also found that it ignored the Planning for Growth assertion to issue planning permissions where possible (March 2011) and more recently it ignores the fact that the failure to make five-year provision invokes paragraph 14 of the Framework by reason of paragraph 49.

4.31. In this decision the Inspector found that the Framework was a material consideration and that it is simply not good enough to regard saved policies as an opportunity to refuse rather than grant planning permission.

4.32. Importantly, paragraph 36 of the decision refers to the “Sedgefield” approach to determining land supply matters where previous shortfalls are spread over the current five year period, rather than spreading it over the remaining plan period. This approach is more commonly known as the residual method (see paragraph 4.6.2 and Appendix A, paragraph 10 of the AMR 2011-2012).

4.33. The Inspector’s view in the Wychavon appeal decision was that it was inconsistent with paragraph 47 of the Framework to meet any housing shortfall by spreading it over the whole plan period as it is clearly better to meet the shortfall sooner rather than later. He also reasoned that if the 5% and 20 % buffers are to be brought forward into the first five years, as in the Framework (paragraph 47) then so also should the shortfall.

4.34. In paragraph 38 of the Wychavon appeal decision the Inspector also found that it
cannot be correct to blame the slump in the property industry for under performance so long as there is not a 5 year supply of sites available now, as required by paragraph 47 of the NPPF. Yet this is precisely the approach being taken by the GNDP in the AMR 2011-2012, Appendix A, paragraph 6. Moreover, the GNDP Councils appear to believe that a more reasonable interpretation of supply is to take the available and suitable land and assess what would be achievable when market demand increases to more typical rates. However, more typical rates in the GNDP area have not been achieved in the past when supply has been measured against requirements.

4.35. The second relevant decision referred to in paragraph 5.36 above is the Stanton under Bardon appeal decision (APP/K2420/A/12/2180699) issued by the Planning Inspectorate on the 18th December 2012. A copy of the Decision Notice is contained in Appendix 10 of this evidence. This is another decision where the Council involved changed its method of addressing the shortfall in housing land provision from the Sedgefield method to the residual method, suggesting that any shortfall would be made good later on in the plan period. The Inspector in this decision also found compelling reasons why the Sedgefield approach should be used in that again, it would attempt to meet the shortfall earlier in the plan period which would be consistent with the advice given in the framework in providing a realistic prospect of achieving the planned supply.

4.36. Similarly in this decision, the Council suggested that under-delivery was due to the lack of implementation of planning permissions but the Inspector found that the Framework does not give this as a justification for persistent under-delivery. In this case it was concluded that a 20% buffer should be applied.

4.37. By contrast, the Liverpool method frustrates any shortfall in delivery being made-up as early as possible. This conflict between the NPPF and the Liverpool approach has recently been recognised by the Local Government Association and the Planning Advisory Service in their guidance note of July 2013\(^6\). In Section 8 the document acknowledges that there is no guidance on the correct methodology to adopt but recognises the general trend for planning inspectors to prefer the Sedgefield method, noting that:

“the ‘Sedgefield approach’ is more closely aligned with the requirements of the NPPF and the need to boost significantly the supply of housing and remedy the unsatisfactory consequences of persistent under delivery. ”

4.38. It is my opinion that the Sedgefield method assists with the delivery of the NPPF objective to boost housing land supply and thereby maximise the prospects of the JCS targets being delivered during the plan period rather than cumulatively storing-up shortfalls for later years and reducing the prospect of achieving the plan's target with the Liverpool

\(^6\) LGA PAS 10 Key Principles for Owning your Housing Numbers, July 2013
method.

**Conclusion on Issue 1**

4.39. The Council have in various reports to the Planning Committee and in correspondence on this appeal proposal acknowledged there is shortfall in the 5 year housing land supply. Using the Sedgefield method this becomes extremely significant. It is also clear there has been persistent under-delivery of housing land supply to warrant a 20% buffer.

4.40. It therefore follows, that NPPF paragraph 49 is triggered and the policies of the Development Plan that affect housing supply should be considered out-of-date. This means that there is a presumption in favour of granting this appeal unless the adverse impacts of doing so, when judged against the NPPF, are significantly and demonstrably outweigh the benefits as to justify a refusal (NPPF paragraph 14).

**Issue 2: Blofield a Sustainable Settlement capable of accommodating additional residential development?**

4.41. Having identified a deficiency in the 5 year housing land supply, the appeal site is considered to be an entirely suitable site for housing development; a site within a sustainable settlement, within close proximity to Norwich with good public transport links, and capable of being developed without undue impact on the fabric of the village. This would be consistent with the guidance of the NPPF. Additionally, it is entirely logical that the area of the NPA with the greatest deficiency in housing land supply, the Broadland part, should be the focus for efforts to boost the supply. Normally this would involve efforts to bring forward allocated sites, however this avenue of supply is significantly hindered by the delay caused by the re-examination of parts of the JCS, see below.

4.42. 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 the only main town, Wymondham within the NPA. Policies 14, 15 and 16 deal with the Key Service Centres (KSC's), service villages and other villages respectively.

4.43. The spatial strategy, Policy 9, of the JCS for the Broadland part of the NPA is however remitted and therefore not adopted. This affects the proposals for 7,000 dwellings with the “Growth Triangle” and the further smaller site within the Broadland NPA allowance of 2,000 dwellings for distribution amongst the Norwich fringe parishes, KSC, and service villages.
4.44. The Examination into these provisions closed in July and the Inspector’s recommendations are not anticipated to be received by the GNDP until after the close of this Inquiry, in early November.

4.45. At this point it is curious to note that while the spatial distribution of the housing allocation with the Broadland part of the NPA is remitted, the Council has chosen to continued with the publication the Site Allocations DPD – Preferred Options which suggests the distribution of the “Smaller Sites” allowance of 2,000 dwellings amongst the fringe parishes of Drayton (2 sites totaling 200 dwellings), Hellesdon (2 sites totaling 800 – 1,000 dwellings) and the KSCs of Blofield (2 sites with planning permission totaling 197 dwellings), Brundall (1 site with planning permission for 150 units) and the Service Villages of Blofield Heath (20 dwellings), and Horsford (1 site with planning permission for 63 dwellings and another application for 125 dwellings approved at the Planning Committee on 11 September 2013). The consultation process has attracted a significant number of objections, particularly to the proposal to redevelop the golf club at Hellesdon. Final selection of the sites will be based on the consultations received and no doubt the outcome of the Examination into the remitted parts of the JCS. Adoption of this document is anticipated to be the winter of 2014/2015 which I view as optimistic given the position with the JCS.

4.46. I therefore consider that this process will not play any conceivable part over the next 18 months or so in addressing the current deficiency in the 5 yr housing land supply. This is assuming no significant changes to the remitted JCS strategy for housing growth in the Broadland part of the NPA.

4.47. Blofield is however a sustainable location for housing growth. Within the JCS Blofield is identified as a Key Service Centre (KSC). Policy 14, which remains as adopted policy and not remitted, identifies the village together with 9 other settlements for varying levels of growth, ranging from 50 – 1,800 dwellings. KSCs 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
4.48. Blofield has all these facilities and meets the criteria. In addition, the village also has a nursery school open daily with 29 places and a pre-school playgroup at the Margaret Harker Hall open three days per week. The main reason given in the JCS for only allocating a small amount of development in Blofield is the lack of a secondary school, limited shopping and employment. However, the nearest high school at Thorpe St Andrew is only 10km (7 miles) from the appeal site and is on a direct bus route from Blofield with an acceptable walking distance from the bus stop in Thorpe St Andrew. In addition, 3 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.

4.49. The settlement is well served by bus services and therefore accords with the basic criteria as stated in paragraph 6.45 of the JCS. It is clear that the absence of a secondary school should not preclude Blofield from being considered suitable for a larger amount of development.

4.50. In addition, the appeal site is located 2.3km (1.5 miles) from the railway station at Brundall, this is considered to be a suitable distance for cycling. This station is on the Great Yarmouth - Norwich and Lowestoft – Norwich lines which offers connections on the main line to London via Norwich. Journey times to Norwich are around 10 minutes. During weekday peak hours the frequency of trains reach 4 per hour. Outside peak hours during weekdays and Saturdays the services to and from Norwich are generally 1 to 2 trains per hour in both directions. Commencing around 06:00 to Norwich and 05:13 from Norwich until 23:00 from Norwich and 00:03 to Norwich. Sunday services are generally 1 or 2 per hour. The frequency of service, the short journey times on the branch line and ease of connection to main line services provides the appeal site with exceptionally good public transport options.

4.51. The Settlement Hierarchy Topic Paper (November 2009) produced by the GNDP as part of the preparation for the JCS lists in Table 1, page 17, the list of facilities that would provide greater flexibility in selecting settlements for KSC status by means of a simplified “menu” of services. Page 18 of the document notes how during the consultation process, the Broadland and South Norfolk Council Members wanted to take account of social sustainability, such as that represented by successful community activities and social groups that could support a vibrant community. While the document notes there is no control over the people ensuring the success of such activities, the provision of facilities such as a village hall/ community centre and possibly a school, pub, church and shop/post office could provide a focus for them. Therefore they were included in the Table 1 “menu” of services, along with the provisions for “Community Groups”.

(Paragraph 6.45 of the JCS)
4.52. Evidence presented to the Manor Farm appeal (The Blofield appeal) illustrated that there are 90 existing commercial premises in Blofield and Brundall which are listed as being used as offices, factory, shops, public house, surgery (doctors and dentist), vehicle, repair workshop, workshop, warehouse, garden centre, funeral parlour and car showroom. Since the date of that appeal, the former Little Chef roadside restaurant has been completely refurbished and re-opened as a MacDonald’s 24 hour roadside restaurant and take-away.

4.53. In addition, the appeal site is also well located to the Broadland Business Park, the major business location within Broadland and a significant provider in terms of Norwich, comprising 25.8 hectares providing a mixture of office, light industry and storage and distribution uses with Phase 1 of 2 being 75% occupied. Adjacent to this is the Meridian Business Park, a small development of office accommodation. Both are located on the eastern fringe of Norwich at Thorpe St Andrew, 5.4 kilometres (3.4 miles) away and easily accessible by the frequent bus services running through the village.

4.54. Within the village there is a convenience store with a post office, newsagents, florists, hairdressers, carpet and curtains shop, and a fish and chip take-away shop. There is also a large garden centre combined with an outdoor pursuits/camping store. These facilities would meet the day-to-day needs of the occupiers of the proposed properties on the appeal site. Indeed, the additional population resulting from the appeal proposal could add to the vitality and viability of these important village shops.

4.55. Para 20 of the Inspector’s report on the Blofield appeal considered the location of the village and whether the settlement could be considered as sustainable for further housing growth:

“Sites in the built-up parts of the urban fringe parishes are likely to be closer to wider range of facilities and services and to be served by a greater variety of public transport services than would be the case at Blofield. Having regard to these considerations, such sites are more sustainable than locations at Blofield, and this is recognised in the JCS, which expects a greater level of development to take place in the Norwich urban area and the main towns than in the key service centres. Nevertheless there are two regular services between Blofield and Norwich, providing one or two buses per hour in each direction, and trains. I consider that there is a good range of facilities sufficiently close to the appeal site to enable walking and cycling to provide realistic alternatives to the use of the private car, and public transport services are available for journeys to and from Brundall and Norwich. Blofield is clearly a sustainable location for additional residential development, and its identification as a key service centre in the JCS, with an intended provision of at least 50 dwellings (including a possible contribution to the smaller sites allowance) bears this out.” (Paragraph 20)
4.56. The District Council 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 2 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 appeal site by the appellants 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. The Sustainability Appraisal undertaken by the Council scores the site favourably, particularly in terms of the relationship of the site to the existing village and facilities where the Council's Sustainability Appraisal notes the accessibility to local facilities and public transport should help to minimise private car use. In respect of the criteria looking at improving accessibility to essential services, facilities and jobs, the site is noted as being close to the services and facilities in Blofield and having good access to Norwich via the A47 and bus services. Looking at “encouraging sustained economic growth” the appraisal states the site will increase the housing supply which may benefit the local economy. The site also has limited landscape impact, and would fit well with the form and character of the village.

4.57. The appraisal, in the summary on social impacts, states:

“The allocation contributes to the JCS housing requirement. It is close to the services and facilities in Blofield and has good access to the countryside via public rights of way”

4.58. In respect of economic impacts, the summary states:

“The local economy may benefit from the increase in housing supply and the local service provision being sustained with the help of new residents.”

4.59. Consultation had been undertaken on these sites, but the Manor Farm appeal decision has influenced the Council not to proceed with further allocations in the village as part of the recently published Site Allocations, Preferred Options document on which consultation ended on 2 September 2013.

4.60. Therefore, and with regard to the significant deficit in the supply of housing land in the NPA, it is considered that Blofield is a sustainable location for new residential development of the scale proposed.

**Issue 3: Is the appeal site appropriate for development**

4.61. The District Council does not allege that the residential development of the appeal site will in itself have any adverse impact on the surrounding area or the amenity of nearby
residents.

4.62. The suitability of the land has been recognised since the first development of the Wyngates in 1988. Unusually the highway authority own the small area of land beyond the existing road to the appeal site boundary; shown on the application (BDC ref. 88/2130) drawing as “land to be adopted by NCC (maintenance free)”. Clearly at that time there was an expectation of further development on to the appeal site. In comparison with other sites around Blofield the appeal site is the most contained in terms of visual impact.

4.63. Responses from the consultees on the current application were positive, with no objections from the Council's Conservation Officer (Aboriculture and Landscape), Ecological advisor, Environmental Heath Officer, Pollution Control Officer, Housing Enabling Officer or Recycling Officer. External consultees with no objections included the Highways Agency, Norfolk County Council Highways, Environment Agency, Anglian Water, Norfolk Archaeological Services and Norfolk Police Architectural Liaison Officer.

4.64. The Council's Conservation Officer (Design) objected to the scheme design on the grounds that the layout is ‘unimaginative and lacking a distinct character’ and that the house types are ‘routine designs’. However, the Council did not refuse planning permission on design grounds and does not argue in its Statement of Case that planning permission was refused on design grounds.

4.65. This resulted in the Planning Officer's report to the Planning Committee advising that:

“The application is acceptable in terms of flood risk, landscape, the character and appearance of the area, and the residential amenity of neighbouring properties and of potential future occupiers. Furthermore, the proposal would contribute the five year housing supply deficit that exists in the NPA.”

Issue 4 – Impacts of additional development above the JCS allocation

4.66. The possible impacts cover an number of issues, including the impact on the planning policy for the settlement hierarchy and on the ability of the services and facilities in the village to accommodate/serve additional persons.

Settlement Hierarchy

4.67. A key issue is the ability and appropriateness of the settlement to accommodate additional dwellings.
4.68. Within the Broadland part of the NPA the JCS proposed an allocation of 9,000 dwellings to be provided by 2026. This figure remains as part of the adopted JCS and has not been remitted. However, the subsequent distribution of 7,000 houses to the ‘Growth Triangle’ and the “small sites” allowance of 2,000 dwellings for distribution amongst the Norwich fringe parishes, key service centres and service villages is remitted and consequently not forming part of the adopted JCS.

4.69. Policy 14 of the JCS remains adopted. This policy sets out the scale of growth for the Key Service Centres. The former East of England Plan advised LPAs in the preparation of the settlement strategy to propose some larger villages be classified as “Key Service Centres” with potential to accommodate development which is sympathetic to local character and of an appropriate scale and nature in relation to the local housing and employment needs.

4.70. Ten KSC are identified in the Greater Norwich Area, 7 are within the NPA. Within the Broadland part of the NPA there are just two settlements listed as KSCs – Brundall and Blofield. Policy 14 states that land will be allocated for residential development in these settlements to the scale indicated and subject to a detailed assessment including impact on form and character and the resolution of any specific servicing constraints. For most of the KSCs the scale of development ranges between 100 – 200 dwellings, with notable exceptions in the South Norfolk district at Hethersett (1,000 dwellings) and Long Stratton (1,800 dwellings). Conversely, Brundall and Blofield in Broadland are identified for development of approximately 50 dwellings plus additional dwellings from the Broadland NPA “smaller sites” allowance of 2,000 dwellings.

4.71. Limited guidance is given on the “smaller sites” allocation, but these are stated as being less than 1,000 dwellings. Allocations would also be made in accordance to settlement hierarchy and local environmental and servicing considerations. Para 6.6 of the JCS states that ‘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’. Policy 14 also identifies that both Brundall and Blofield may be considered for additional development to help deliver the ‘smaller sites in the NPA’ allowance.

4.72. While the distribution of housing growth in the Broadland part of the NPA is remitted and the outcome of the Examination is not yet known, the Council have embarked on publication of their preferred Site Allocation DPD in advance of a decision on the JCS. The allocations document proposes a number of sites within the fringe parishes and the KSC to comprise the “smaller sites” allowance which actually total 2139 units. However, at this stage the allocations document cannot be given any weight as the overriding JCS distribution remains remitted with the Inspector’s report not due until later this year.
4.73. As Blofield is a settlement where the principle of additional housing to contribute to the smaller sites allowance is acceptable, the Manor Park Inspector considered that residential development at some level in excess of 50 dwellings would be consistent with the JCS approach in its policies for places. The issue is what would be considered an appropriate level of growth within the context of the smaller sites allowance of 2000 dwellings, the settlement hierarchy and the ability and appropriateness of Blofield to accommodate the additional dwellings. I will examine each of these elements in turn.

4.74. Firstly, the scale of growth within the context of the smaller sites allowance. Policy 9 of the JCS provides for a floating allowance of 2000 dwellings for distribution within the Broadland NPA, this allowance is intended “to provide a balance between site sizes and locations to encourage flexibility and the shorter term delivery of new housing” (paragraph 6.6 of the JCS) where the larger allocations at growth locations are by their nature going to be slow to delivery because of investment decisions and the delivery of upfront infrastructure.

“Allocations to deliver the smaller sites in Broadland and South Norfolk will be made in accordance with the settlement hierarchy and local environmental and servicing considerations” (JCS Policy 9)

4.75. Policies 12, 14 and 15 of the JCS state that in the fringe parishes, KSC and service villages respectively, land will be identified to contribute to the smaller site allowance. An indication of how the Council intend to distribute between the various settlements has been undertaken in the draft SA DPD where the housing numbers for the various tiers of settlements has been proportioned on suggested sites as follows:

- Fringe Parishes 20 – 1000 dwellings
- KSC 150 – 197 dwellings (already having consent)
- Service Villages 20 – 63 dwellings

4.76. This division of the allocation would appear to be working on the basis that the fringe parishes are generally the most sustainable locations, with the next ring of settlements offering good prospects for sustainable development. In the KSC and Service Villages this depends on the size of settlement and available services, together with suitable sites existing and available, services are present and with capacity, and public transport links to Norwich and the main areas of employment.

4.77. The addition of 64 dwellings amounts to 3.2% of the smaller sites allowance. Such a small percentage could not be considered as a sizable or significant proportion of the allowance.
4.78. In terms of the number of settlements contributing to the smaller sites allowance and the range of site sizes, the draft SA DPD allocates dwellings to 11 settlements, with Hellesdon (fringe parish) having the largest single allocation of 1000 dwellings and the lower order service villages (six in total) range from 20 – 63 dwellings. Therefore, the additional 64 dwelling would not compromise the range or location of sites already identified by the Council. It is therefore not considered to be inappropriate within the context of the 2000 dwellings allowance. Judging from the recent decision by the Council on the Horsford application (paragraph 4.45 above), it appears an appropriate degree of flexibility is available.

4.79. Turning to the settlement hierarchy, it is important to view this element within the context of the NPA as the appropriate strategic housing market. The Broadland part of the NPA does not have a main town, the only one within the NPA is Wymondham in South Norfolk. The housing allocated to the this town is 2,200 dwellings. It would be inappropriate and misguided to compare the main towns in the rural area to the scale of growth proposed for the settlements in the NPA; with the Norwich region identified in the now revoked East of England Plan as a location for regional scale of growth. Within Broadland the single largest allocation could be the Growth Triangle of 7,000 dwellings, although this part of JCS Policy 9 is currently remitted. Below these settlements are the fringe parishes, the KSC and service villages identified in the JCS for varying degrees of growth. As discussed above, paragraphs 4.74 – 4.77, the additional 64 dwellings is appropriate within the range of sites proposed to be allocated across the hierarchy of settlements for the 2000 smaller sites allowance. It is also considered that the additional dwellings to give a potential total of 261 dwellings in Blofield would still retain the hierarchy within the NPA, in a similar manner to the Council’s recent decision on the application for planning permission at the service village of Horsford.

4.80. I have previously discussed the capacity of Blofield to accept the additional dwellings under Issue 2 above (paragraphs 4.47 – 4.50 in particular) and also discuss the services and facilities below (paragraphs 4.85 – 4.97). The capacity of Blofield to accommodate the already consented dwellings plus the appeal proposal is largely dependent on the sustainable location of the settlement, infrastructure, and the form and character of the settlement.

4.81. The village is sustainable in terms of its location, services present, public transport provision, employment and close proximity to one of the major business parks in Norwich. Blofield is therefore considered to be not only capable of accommodating the additional houses, but it would also be an appropriate settlement and location within the NPA.

4.82. Previously the Council in granting planning permission for the 22 dwellings adjacent to 20 Yarmouth Road, assessed the circumstances in exceeding the approximate allocation
of 50 dwellings in Blofield. The report to the Planning Committee on 27 February 2013 (Appendix 11 to this Proof) states:

“There are three key factors to consider in assessing whether more than 50 dwellings is appropriate to Blofield: (1) that Blofield is a reasonably sustainable location for some new housing development; (2) that the NPA does not have a five year supply of land available for housing; (3) that the JCS figure of 50 dwellings is a minimum and more dwellings may be needed to contribute towards the 2000 dwellings to be provided in the Broadland part of the NPA that is outside the proposed Growth Triangle.” (Paragraph 9.12)

4.83. Clearly there are circumstances when the Council consider it is appropriate to permit a larger scale of development than envisaged by the JCS. Indeed, the more recent report on the planning application in Horsford, approved by the Planning Committee on 11 September 2013 again illustrates another example of where housing growth, this time in a lower order Service Village, is permitted to increase to a total of 157 dwellings, approximately ten-fold the number anticipated by the settlement hierarchy in the JCS. Being more consistent with the scale of development advised for most KSC's.

4.84. I do not consider the increase in dwellings presented by the appeal proposal would compromise the settlement hierarchy. There is a clear division between the higher order Main Town of Wymondham in the NPA and the KSC villages. At Wymondham the JCS designates the settlement as an expanded community and consequently allocates at least 2,200 dwellings. The growth at Blofield from the current permitted number of 197 dwellings to 261 dwellings with the appeal proposal would not, in my opinion, prejudice the strategy or erode the hierarchy of settlements. The appeal proposal is an appropriate scale of development on a site within a sustainable settlement that can be developed without undue impact on the character or form of the village.

Services & Facilities in the Village

Education

4.85. Blofield Primary School is about ten minutes walk from the appeal site to the west of Plantation Road and has pedestrian access from North Street and Plantation Road.

4.86. Blofield does not have a secondary school. The nearest high school at Thorpe St Andrew is about 5 miles from the appeal site. Thorpe St Andrew High School is on a direct bus route from Blofield with an acceptable walking distance from the bus stop in Thorpe St Andrew to the school. In addition, 3 school bus services to Thorpe St Andrew High School operate direct from Blofield. The Thorpe St Andrew students all travel on dedicated school
buses. Those school buses are currently full; the County Council would provide an additional bus or larger buses if demand increased substantially.

4.87. There is also a direct bus route to the High School in Acle which is approximately 5.2 miles to the east of Blofield.

4.88. The County Education Authority raised no objection to the planning application for the appeal site on education grounds subject to the payment of a financial contribution of £353,086 towards primary, secondary and 6th form provision at Blofield Primary School and Thorpe St Andrew High School. Following adoption by Broadland District Council of Community Infrastructure Levy with effect from 1st July 2013, the financial contributions requested towards the education provision will in fact be covered by the CIL charge. The County Council will therefore rely on the District Council to support its claim for education funding through the CIL process and provide the necessary funding.

4.89. The County Council confirms that Blofield Primary School and Thorpe St Andrew High School are both capable of being expanded to accommodate the additional pupils generated by the appeal scheme.

4.90. In addition to the LEA provision, the village has a privately run nursery school with 29 places and also a pre-school playgroup.

Health Care

4.91. Blofield has a GP's surgery to the north-east of the appeal site, located on Plantation Road. The practice has five doctors plus allied professions and support staff. Examination of the figures available from the NHS for GP surgeries the number of patients registered at the Blofield Surgery in 2008 was 5543 and the latest figure available is 5548 in 2011 and I note from the NHS Choices website that the practice is still accepting new patients.

4.92. I have examined the ratio of patients against the number of doctors for the Blofield surgery and compared these against the ratio of the surgeries in the other KSC in the GNDP (Appendix 12 to this Proof). This is a basic but acknowledged measure of access to GPs. The GP/patient ratios within the KSC's ranges from 1110 to 1733, with the Blofield Surgery being the lowest. Examination of the age cohorts of the patient list does not reveal any significant differences between Blofield and the GP Surgeries in the other KSC settlements.

4.93. The Inspector for the Manor Park appeal when considering the impact on services within the village, presumably this included the doctors' surgery, resulting from the

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7 A Rapid View of Access to Care; An Inquiry into the Quality of General Practice in England, The Kings Fund, 2010
proposed development stated (para. 24) that “I do not consider that infrastructure in Blofield
would be ill-suited to meeting the needs arising from the housing included in the appeal
proposal”.

4.94. New patients bring funding to the surgery and while this influx of new patients
resulting from the appeal proposal would conceivably be accepted by the surgery, if there
are any problems with space requirements within the actual building these could be
overcome by extension on the existing surgery site. Further expansion of the site is also
possible with vacant land owned by Norfolk County Council to the north and east of the
surgery.

4.95. It should also be noted that the village is also covered by the GPs Practice in
Brundall which also covers the area to the north, including the ongoing housing
development at Little Plumstead (see map of catchment area in Appendix 13).

Shopping and Community Facilities

4.96. I have previously identified above, that the village has a convenience store with a
post office, newsagents, florists, hairdressers, carpet and curtains shop, and a fish and chip
take-away shop. There is also a large garden centre combined with a outdoor
pursuits/camping store. It is considered that these facilities would meet the day-to-day
needs of the occupiers of the proposed properties on the appeal site. Indeed, the additional
population resulting from the appeal proposal could add to the vitality and viability of these
important village shops.

4.97. This would be a similar position for the community halls and the County Council
library within the village. The additional population could provide welcomed support from
additional users; the County Council have requested a financial contribution via a section
106 agreement in respect of the library, but this would now become part of the Community
Infrastructure Levy contribution.

The scale and timing of proposed development in the village

4.98. It is considered that the speed of delivery of the dwellings will enable the settlement
to gradually assimilate the new development without undue social “impacts/effects”.
Examination of the likely delivery rates for the site illustrate two important considerations.
Firstly, the Manor Park site will not be developed-out until 2020 (assuming there are no
delays because of the planning restriction that limits the site to 87 houses until 3,000 sq m
of business floorspace is provided). Secondly, the Norfolk Homes proposal at Wyngates is a
detailed application capable of delivering houses within months of the consent being issued;
the applicants are local house-builders with experience of this size of development and with
the ability and intention to commence on the site at the earliest possible opportunity.

4.99. Turning to the Manor Park site and the outline planning permission for 175 houses and 4000 sq m of Class B1 floorspace. The programme for this site according to the applicants assumes an optimistic build rate of 30 - 40 dwellings per annum and they have stated in the appeal that delivery of the houses could commence during 2015, but recent events now cast severe doubt over whether this date could be realised with the landowners now undertaking pre-application consultation for a food supermarket on part of the site previously approved for employment development. Assuming this latest proposal does not proceed, the currently, the timeline is likely to be as follows:

Table 1

<table>
<thead>
<tr>
<th>Time Period</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mid 2014</td>
<td>Marketing the site and entering into a legal agreement with a housebuilder</td>
</tr>
<tr>
<td>1st half 2015</td>
<td>Public consultation by the housebuilder; preparation, submission and approval of reserved matters</td>
</tr>
<tr>
<td>19 March 2015</td>
<td>Drop-dead date for submission of reserved matters</td>
</tr>
<tr>
<td>2nd half 2015</td>
<td>Technical approvals and start on infrastructure</td>
</tr>
<tr>
<td>End of 2016</td>
<td>30-40 dwellings completed (total)</td>
</tr>
<tr>
<td>End of 2017</td>
<td>60-80 dwellings completed (total)</td>
</tr>
<tr>
<td>Progress beyond 88 dwellings requires 75% of the business floorspace(3,000 sq m) to be provided</td>
<td></td>
</tr>
<tr>
<td>End of 2018</td>
<td>90-120* dwellings completed (total)</td>
</tr>
<tr>
<td>End of 2019</td>
<td>120-160 dwellings completed (total)</td>
</tr>
<tr>
<td>End of 2020</td>
<td>150 - 175 dwellings completed (total)</td>
</tr>
<tr>
<td>End of 2021</td>
<td>175 dwellings completed (total)</td>
</tr>
</tbody>
</table>

4.100. It must be borne in mind that the approval has a condition which limits the dwellings to 50% (88 units) until 75% (3,000 sq m) of the 4,000 sq m business floorspace is provided on the site. This could result in a significant delay to release of the remaining 50% of the housing, beyond the 2018 – 2019 unfettered completion outlined above.

4.101. Even with an unfettered development process, the above time-scale is considered to be optimistic with the lower end of the delivery scale more likely. The Manor Park site will be competing with the Cucumber Lane, Brundall development by Persimmon Homes which is just 0.9 km (0.54 miles) from the site, where although there is a strong market in this location, and both sites are anticipated to sell well, we are not at the 'boom' market position where strong delivery of c.50dw pa per site might have been possible.
4.102. If the landowners of Manor Park proceed with the proposal for the supermarket, this will necessitate a new application for both the houses and the supermarket. Further delaying the commencement of housing until at least end of 2016.

4.103. The evidence of Terence Harper deals with the details of delivery of housing on the appeal site, however, it is worth repeating that Norfolk Homes are the landowners of part of the site and have an option agreement with the landowner for the remainder. With the appeal proposal being for detailed planning permission, this combined with the ownership would enable Norfolk Homes Ltd to commence immediately with the various technical approvals and actually start on site by mid 2014. Consequently, the appeal site would commence development 18 months before the Manor Park site and be completed in 2017 as the Manor Park site is only getting underway (assuming commencement of the scheme granted consent on appeal).

4.104. The table below provides a year by year analysis of the building rate within the village based on the two approved schemes (Manor Park and Yarmouth Road) and the Norfolk Homes site at Wyngates over the period 2013 – 2020.

Table 2

<table>
<thead>
<tr>
<th>Year</th>
<th>Wyngates 64 units</th>
<th>Manor Park 175 units</th>
<th>Yarmouth Road 22 units</th>
<th>Annual Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Build Rate</td>
<td>Build Rate</td>
<td>Build Rate</td>
<td>Build Rate</td>
</tr>
<tr>
<td>End 2013</td>
<td>30 pa</td>
<td>30 pa</td>
<td>40 pa</td>
<td></td>
</tr>
<tr>
<td>End 2014</td>
<td></td>
<td></td>
<td></td>
<td>11</td>
</tr>
<tr>
<td>End 2015</td>
<td>30</td>
<td></td>
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</tr>
<tr>
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<td>30</td>
<td>30</td>
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<td>64</td>
</tr>
<tr>
<td>End 2017</td>
<td>4</td>
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</tr>
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<td></td>
<td>30</td>
</tr>
<tr>
<td>End 2020</td>
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<td>64</td>
<td>175</td>
<td>22</td>
<td>261</td>
</tr>
</tbody>
</table>

4.105. As discussed above, the highlighted figures for these years are dependent on the 75% of business floor space (3,000 sq m) being provided on the Manor Park site, otherwise the delivery beyond 87 houses could be delayed over subsequent years.
Issue 5: Would the appeal site be premature to the Sites Allocations DPD

4.106. It is the Council's case that more appropriate sites elsewhere in the NPA may be identified through the Site Allocations DPD. As such, the appeal proposal, if allowed, would be premature and prejudicial to the consideration of these alternative sites.

4.107. The document “The Planning System: General Principles” states that prematurity may be a reason for refusal where a proposed scheme is so substantial, or its cumulative effect so significant, that granting permission could prejudice emerging policy by predetermining decisions on new development. Otherwise, the refusal is not usually justified, particularly where a plan is at consultation stage with no early prospect of submission.

4.108. The Site Allocations DPD was recently in a period for consultation which ended on 2 September 2013. Consequently, this document has not been submitted for examination and currently has a number of significant objections. The Council's current estimate for adoption is winter 2014/2015.

4.109. Waiting for the adoption of the DPD will do nothing to address the significant shortfall in housing supply in the NPA generally, or the Broadland part of it, over the next five years. The manner in which this shortfall has been addressed to-date by the GNDDP and Broadland is to recalculate future annual requirements to address the record of inadequate completions and distribute the shortfall over the remainder of the plan period (the Liverpool method). This serves simply to shift the on-going under-performance to a later part of the plan period and does nothing to address the short term supply of houses. This particular point was debated at the recent JCS Examination with no agreement being reached between the parties as to the time period for making good the shortfall – within 5 years or over the remaining period of the JCS.

4.110. In this situation the Council have on occasions chosen to follow an alternative approach to that shown with the appeal proposal. In a report to the Planning Committee three months earlier, on 27 February 2013, the officers presented the case for the application for 22 dwellings on land adjacent 20 Yarmouth Road, Blofield (BDC ref. 20120910). When considering the matter of prematurity to the Site Allocations DPD being adopted, officers stated:

“…. given the relatively early stage at which the SA DPD is at, it is considered that a refusal cannot be justified on these grounds. In terms of whether the application is prejudicial to the consideration of the SA DPD, other sites have been proposed elsewhere in Blofield and it is acknowledged that in approving this planning application in advance of the SA DPD, it will pre-empt the consideration of the alternative sites.”
However, it is considered that the benefits associated with this application outweigh the fact that granting planning permission may prejudice the consideration of other sites.”

4.111. Planning permission was granted for this development in full knowledge of the then pending decision on the Manor Park appeal, two outstanding applications for outline planning permission totaling 89 dwellings and imminent submission of the appeal proposal.

4.112. More recently the Council has chosen to ignore the draft SA DPD in respect of the service village of Horsford to the north of Norwich, where under JCS Policy 15 these settlements are intended to accommodate growth of between 10 – 20 dwellings and those within the NPA may also be considered for additional development, if necessary, to help deliver the smaller sites in the NPA allowance. A site within the village was granted permission for 32 dwellings in March 2011 and the draft SA DPD did not propose any further sites within the village. However, a further application for 125 dwellings was granted permission by the Planning Committee on 11 September. On the issue of the scale of growth for this Service Village, the officers state in their report to the Committee:

“Clearly this is well in excess of the target allocation set out in the JCS and would be a housing commitment commensurate with a Key Service Centre. However, Horsford is one of the larger Service Villages and contains a level of local services potentially associated with a Key Service Centre......... Therefore, and with regard to the significant deficit in the supply of land for housing within the NPA, it is considered that Horsford is a sustainable location for new residential development of the scale proposed.” (Paragraph 9.12)

4.113. This is an application submitted in April 2013 and has progressed in parallel with the preparation of the SA DPD. There are three points to be drawn from this report. Firstly, the obvious acceptance that there continues to be a “significant” deficit in the housing land supply. Secondly, the willingness to enable a housing commitment of a total of 157 dwellings which is significantly above the anticipated range for a Service Village. Finally, the willingness of the Council to grant planning permission in advance of the SA DPD.

4.114. The Council have recognised the shortfall in housing land availability and are the only authority of the three LPAs in the NPA to adopt supplementary guidance to enable the delivery of housing sites in advance of the Development Plan. This Policy Statement refers to the NPPF and acknowledges that 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 that applications should be considered against the policies in the East Of England Plan, the JCS (where unremitted) and the saved policies of the Local Plan as well as the presumption in favour of sustainable development in the NPPF. The report acknowledges that
‘…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’.

4.115. 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 including the following:

- 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.

4.116. The proposal for 64 houses provides a sustainable form of development in an appropriate location within the boundaries of a settlement which has sufficient facilities to accommodate such a development.

- 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 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.

4.117. The appeal site was 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 at that time.

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

4.118. In the course of the recent appeal relating to the site on the north side of Yarmouth Road, Blofield (APP/K2610/A/12/2177219) the District Council argued that, in accordance with the GNDP monitoring report 2011-2012, there was only a 3.28 year supply of housing land available within the Broadland part of the NPA. However, the Appellants the Inspector concluded in the Yarmouth Road appeal decision that 'there has been a persistent under delivery of housing. Accordingly I have reached the view that a buffer of 20% should be applied. That gives a total requirement of housing land for 11,928 dwellings, against which the projected completions would give a supply of only 2.74 years'. I have addressed above the point that the District Council has persistently failed to deliver a 5 year housing land
supply and that a 20% buffer should therefore be applied to the housing supply requirement and the 5 year housing land supply figure calculated accordingly.

4.119. The appeal site is available and deliverable. The application is for detailed planning permission so an expedited commencement could be made on the site in comparison to many of the site granted or seeking permission where these are only for outline planning permission. Open market and affordable homes would make a contribution not only to the 5 year land supply, but also the actual housing stock of the District.

- 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.

4.120. The Appellants are an established, reputable and active house builder who already own a large part of the appeal site and will be able to secure almost immediate possession of the remainder of the site if planning permission is granted. The Appellants will confident that the entire development can be delivered within a maximum of 2 to 3 years.

- 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.

4.121. This application includes the provision of a large area of open space of just under 2ha at the northern end of the appeal site. There is a notable deficit of public open space in Blofield which this open space provision will help to improve. The open space will be available for the use and benefit of the wider community as well as the future occupants of the development. Two smaller areas of open space will also be provided within the site to cater more directly for the occupants of the site.

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

4.122. The development makes provision for 21 affordable homes (33% of the total development) and will include a mix of 1, 2 and 3 bedroom flats and houses. The development therefore entirely satisfies the policy requirements in terms of the provision of affordable housing and will contribute to the stock of affordable housing available within Blofield.
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.

4.123. The appeal scheme complies with all normal policy requirements in respect of environmental and site specific considerations.

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

4.124. There is currently no Neighbourhood Plan for Blofield.

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

4.125. The Appellants undertook lengthy consultations with the District Council, the local community and Blofield Parish Council via public exhibitions, public meetings and private meetings with individual and groups of residents adjoining the site. Changes made to the scheme to satisfy concerns of residents relating to the detailed design and layout of the proposal, and to meet the requirements of the various statutory and other consultees.

4.126. Overall, the appeal proposal is in accordance with the guidance of the NPPF, particularly where there are material considerations and benefits that warrant approving the application against the provisions of the development plan. IN this instance there is a deficiency in the 5 year housing land supply and the appeal scheme would contribute to achieving sustainable development in accordance with paragraph 14 of the NPPF.
5. **Benefits of the Planning Appeal**

**The Site's Suitability**

5.1. The appeal site is exceptionally well related to the existing built fabric of the village and would have a minimal impact on the landscape of the area. Located within existing built development on three sides and with the A47 bypass just beyond the adjacent field to the north the site, it is well contained within the landscape with only very limited views of the site. Indeed, if undertaking a site section process for housing land in Blofield, this site would be the prime candidate. The credentials of the site, as previously described, are such that it would be irrational to reject it when there is a proven need for housing land and the land has only limited functionality as agricultural land at present; the appeal site has much to commend it as recognised by the Planning Officers in their report to the Planning Committee:

“the site is relatively contained between Wyngates to the southeast and east, Yarmouth Road to the south and a combination of Library Close and Manor Ridge to the east. Developing the site would fill in the rectangular gap that exists between the properties on these roads. Given the existing agricultural use of the land, developing it for residential purposes will change its character and appearance but because of its relatively contained nature, it is considered that the impact on the surrounding landscape and wider visual character will not be significantly detrimental.” (Paragraph 9.24)

5.2. In my opinion, the location and disposition of the site makes it a logical and inevitable area for further residential development.

5.3. The site is well located to provide good accessibility to the bus services through the village, local amenities, services and the primary school. The table below lists the walking and cycling times from the site 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>Primary 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>
</tbody>
</table>
5.4. In promoting more sustainable transport options and providing safe and sensitive access together with appropriate levels of car parking, the appeal proposal accords with national and local planning and highway policies.

5.5. Notwithstanding the suitability of the site for housing development and the need for housing within the NPA, the site is also able to deliver benefits to the local community in the form of affordable housing and the open space.

**Affordable Housing**

5.6. The appeal scheme would provide 33% of the proposed dwellings as affordable housing, in accordance with Policy 4 of the JCS.

5.7. The 2011/12 GNDP AMR reports a poor delivery of affordable housing across the GNDP area generally, but specifically in Broadland. Table 4 below shows an extract of the relevant figures. The nest result of this under-delivery has been to increase the percentage of affordable housing to be delivered across the NPA in the remainder of the JCS plan period. The requirement now stands at 46.3%, equivalent to 962 affordable homes per annum (Great Norwich Housing Market Assessment 2011 Update).

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<tr>
<td>GNDP Completions Number</td>
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<td>55</td>
<td>31</td>
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</tr>
<tr>
<td>%</td>
<td>16%</td>
<td>27%</td>
<td>27%</td>
<td>19%</td>
<td>19%</td>
</tr>
</tbody>
</table>

5.8. Broadland has consistently failed to meet the target for affordable homes. This situation fails to take proper account of the NPPF and its requirements in respect of housing supply.

5.9. The appeal proposal, if allowed, would make a contribution to delivering much needed affordable housing in the NPA and Broadland in particular. The delivery of the 21 units within the early phases of development would be a significant gain in the context of Broadland's recent rates of completion and significant benefit of the scheme.
Open Space Provision

5.10. The appeal proposal includes land for use as public open space, two areas of open space within the housing area and the main area of public open space to the north of the housing.

5.11. The adopted standard of the Council is based on the National Playing Fields Association standard of 2.4 hectares per 1000 people, broken down into 0.8 ha. for children's play (equating to four LAPs, two LEAPs and 0.4 of a NEAP) and 1.6 hectares for outdoor sport. The range of properties comprising the 64 dwellings included in the appeal proposal are anticipated to provide for a population of around 147. On this basis the adopted policy would require 0.35 ha. of open space to be provided. However, the proposed scheme provides for far in excess of this figure with 2.1 hectares; helping to address the identified short-fall in public open space provision in the village (Appendix 14).

5.12. There could be an opportunity in the future to link this open space to the adjoining land to the north, owned by Norfolk County Council who recently had proposed this land as a community woodland in association with their application for outline planning permission for 14 dwellings. At the time of the application the appellants enquired about purchasing this land. The two areas of open space could provided a joint area with access from the south via Wyngates and the north-west via Plantation Road.

5.13. This public open space would be offered for adoption to the District or Parish Council and retained in perpetuity. The public exhibition and consultations as part of the preliminary preparation of the application did not provide any clear guidance on the use of the open space. The appellants remain committed to providing the open space as a usable area for whatever reasonable purposes the local community wish, rather than imposing on the local community an unwanted option. Consequently, I would suggest a condition is placed on the grant of planning permission requiring the submission of the layout details etc for subsequent approval following further consultations with the Parish Council and the local community. From correspondence with the Planning Officer I understand this approach is acceptable.

Deliverability

5.14. The appeal proposal is for detailed planning permission. The appeal site is unconstrained by any abnormal infrastructure requirements in advance of development. It is a straightforward site capable of delivering housing within a relatively short time span. The deliverability of the appeal proposal and the time period is discussed by Terence Harper in

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8 Supplementary Planning Document on Recreational Open Space, Broadland District Council, July 2007 (reprinted in February 2008)
his proof of evidence.

5.15. The appeal proposal can be delivered, not only to contribute to the 5 year housing land supply, but contribute actual dwellings to the housing stock of the District for the benefit of residents.
6. Summary and Conclusions: Section 38(b) Balance

6.1. In my view the proposal to construct 64 dwellings on the appeal site with extremely limited impact on the visual or landscape setting of the village, good connectivity to services within the village, sustainable transport options for travel beyond to the relatively close business park and Norwich accords with the relevant policies of the NPPF.

6.2. The planning officers have recognised in their report to the Planning Committee the suitability of the site for development based on the site specific considerations.

6.3. Paragraph 47 of the NPPF requires that Local Planning Authorities maintain annually a supply of deliverable housing sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market and 20% where there has been a history of under-delivery.

6.4. The GNDP have failed to maintain a deliverable 5 year housing land supply evidenced by the recent appeal decisions referred to in this evidence. It is clear that the GNDP is not complying with Government policy on this matter.

6.5. Paragraph 49 of the NPPF requires that applications for housing development be considered favourably. The paragraph further states that “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”. The GNDP cannot demonstrate a five year supply of deliverable housing sites and as such the proposal falls to be determined having regard to paragraph 14 of the NPPF.

6.6. The addition of 64 dwellings to Blofield is considered an acceptable proportion of the Smaller Sites allowance of 2,000 dwellings.

6.7. This increase in dwellings is not considered to compromise the settlement hierarchy. There is a clear division between the higher order Main Town of Wymondham in the NPA, the scale of the growth proposed in the “Growth Triangle” in the Broadland part of the NPA, the KSC villages and the Service Villages. At Wymondham the JCS designates the settlement as an expanded community and consequently allocates at least 2,200 dwellings, the Growth Triangle in Broadland currently has an allocation of 7,000 dwellings to 2026 (this part of the policy is currently remitted). The growth at Blofield from the current permitted number of 197 dwellings to 261 dwellings with the appeal proposal would not, in my opinion, prejudice the strategy or erode the hierarchy of settlements.

6.8. Blofield possesses a range of service and facilities, such as shops, post office, meeting halls, doctors, primary school and an acceptable distance and bus services to the
local high school. All of which contribute to the sustainability of the settlement and the suitability of Blofield to accommodate additional housing. The Inspector for the Manor Park appeal when considering the impact on services within the village, resulting from the proposed development stated (paragraph 24) that “I do not consider that infrastructure in Blofield would be ill-suited to meeting the needs arising from the housing included in the appeal proposal”.

6.9. The proposed development would provide 21 units of affordable housing, to assist in the delivery of such units when the Council have not been meeting the targets in previous years. Additionally, the scheme would also provide public open space to address the shortage of informal recreation space within the village.

6.10. The appeal proposal is for detailed planning permission with the appellant owning part of the site and the remainder under an option to purchase agreement. It is therefore possible for development on the site to commence at an early date and with completion within 2 – 3 years. Given the current circumstances with the Manor Park site, previously approved on appeal, it is extremely likely that the Wyngates site would be completed before Manor Park starts to deliver dwellings.

6.11. Granting permission for the appeal site is not considered as being premature to the Local Plan process. The housing distribution policy for the Broadland part of the NPA is currently remitted with the Inspector's report not expected until mid November. The Site Allocations DPD was recently in a period for consultation which ended on 2 September 2013. Obviously the SA DPD is relying on the distribution of housing contained in JCS Policy 9 to remain unchanged by the Examination Inspector. However, the SA DPD has not been submitted for examination and currently has a number of significant objections, particularly to the largest allocation at Hellesdon which is intended to deliver 50% of the 2,000 dwellings Smaller Sites allowance. The Council's current estimate for adoption is winter 2014/2015, but this document cannot be given any weight in the determination of this appeal.

6.12. It would, in my view, be illogical to prefer more outlying areas for residential development in advance of or in preference to the appeal site in order to assist in addressing the acknowledged shortfall in housing land supply. I would therefore contend that planning permission should be forthcoming and the appeal allowed.