Planning Statement

Detailed Application – Erection of 74 dwellings, vehicular access, open space and associated works

Land off Drayton High Road, Drayton, Norwich

On behalf of Norfolk Land Limited & Norfolk Homes Limited
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Report Ref. 367 – Planning Statement

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1 Introduction

1.1 Wheatman Planning have been appointed by Norfolk Land Limited and Norfolk Homes Limited to provide planning consultancy services in respect of the proposed development subject to this application.

1.2 This Planning Statement supports a detailed planning application for the development of land attached to Low Farm located to the south of the A1067 Drayton High Road and to the south-east of the centre of Drayton village to accommodate 74 dwellings together with vehicular access to the site and the provision of public open space.

1.3 The application is also supported by the following submitted documents:

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<tr>
<th>Drawings:</th>
<th>Proposed Layout</th>
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<tr>
<td>NHDN/10-01</td>
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<td>NHDN1/EF-01</td>
<td>External Finishes</td>
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<td>NHDN1/GEN/011</td>
<td>Affordable Housing Plan</td>
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<td>Site Location Plan</td>
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<td>1304/SEC/001</td>
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<td>1304/SUR/01 Rev B</td>
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<td>1304/HVY/043 Rev B</td>
<td>Access with realigned Drayton High Road</td>
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<tr>
<td>16.12.01-PL01</td>
<td>Chesterton ‘A’ House Type</td>
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<td>16.12.01-PL02</td>
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<td>16.12.01-PL03</td>
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<td>16.12.01-PL04</td>
<td>Drake ‘D’ House Type</td>
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<td>16.12.01-PL05</td>
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<td>16.12.01-PL06</td>
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<td>16.12.01-PL07</td>
<td>Keats &amp; Shelly ‘D’ Combination</td>
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<td>16.12.01-PL08</td>
<td>Shelly ‘D’, Keats &amp; Minton Combination</td>
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<td>16.12.01-PL09</td>
<td>Keats &amp; Minton Combination</td>
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<td>16.12.01-PL10</td>
<td>Defoe ‘A’ House Type</td>
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<td>16.12.01-PL11</td>
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The application has been prepared with regard to the adopted Development Plan which in this instance consists of The Greater Norwich Joint Core Strategy 2011 (JCS) as amended 2014; Broadland District Council (BDC) Development Management Policies DPD (August 2015); BDC Site Allocations DPD (May 2016).

Regard has also been given to the advice and policies contained within the National Planning Policy Framework 2012 (NPPF) which local plan documents are expected to be in conformity with.

In addition reference is also made to supplementary planning guidance documents prepared by Broadland District Council and identified individually later in this report and also to relevant sections of the National Planning Practice Guidance online facility.

Throughout the process of preparing this application and following the guidance contained in s122 of the Localism Act 2011, Broadland District Council’s adopted Statement of Community Involvement and its Community involvement protocol the applicants have consulted with the local community, various statutory and other consultees and the District Council in preparing this application.

More details of this consultation exercise are provided in the accompanying Statement of Community Involvement and the Design and Access Statement.

This statement will set out the appropriateness of the development in terms of its scale,
location and its relationship to the existing built up area and the surrounding
countryside, how it meets the policies of the Development Plan and as a result of this
how it relates favourably to the village of Drayton.
2 Site Description and Context

2.1 The application site covers an area of approx. 3.0ha (7.4 acres) of agricultural land found at Low Farm Drayton found approx. 6km north-west of Norwich city centre. It is found to the south of the A1067 Drayton High Road and to the south-east of Drayton Village. It lies just outside but immediately adjacent to the limits to development identified within the Broadland District Council (BDC) Site Allocations DPD (2015).

2.2 The site consists of one, roughly rectangular, undulating field that slopes down from the south-east to the north-west at gradients ranging from 1 in 8 to 1 in 30. The site boundaries are generally well defined with an established hedgerow extending along the western part of the northern boundary. The central part of the northern boundary is more open while the eastern part is bounded by a group of trees, four of which will need to be removed to create the proposed vehicular access. Beyond the perimeter vegetation to the north there is residential development at Lodge Breck and extending along Drayton High Road. This existing development adjoining the site to the north displays a distinct mix of style and design. Older style terraced and semi detached properties front Drayton High Road and directly back onto the site. Some gaps can be found in the landscaping between the site and existing properties. Further to the west Lodge Breck consists of a dense housing association development of mainly terraced properties built in a mixture of red brick and painted render. An area of informal open space bounded by an established hedgerow provides a good buffer between the sites for this stretch of the northern boundary. To the east the site is bounded by mature broadleaf trees and a 3m to 4m high wall attached to the property known as Drayton Old Lodge hotel. The existing landscaping provides extremely good screening between the two sites. The southern boundary of the site also lies adjacent an established planted woodland approx. 15m deep. Beyond this woodland open countryside stretches away towards the Wensum River Valley. To the west the site is more open and abuts part of the farmyard of Low Farm as well the modern residential development that consists of detached chalet bungalows known as Low Farm.

2.3 There are no public footpaths, public rights of way or special designations directly affecting the application site. There are however a number of public footpaths in the local area with potential views of the site.
3 The Proposed Development

3.1 This detailed application seeks consent for the development of 74 dwellings together with vehicular access to the site, public open space and associated infrastructure. The built development will consist of a mix of one, two, three, four and five bedroom properties, 24 of which will be affordable homes.

3.2 The overall site has an area of 3.0 ha, of which the housing development will occupy 2.19 ha (gross) and public open space will extend over the remaining approx. 0.81 ha.
4 Relevant Planning Policy

Development Plan

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

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

- The Greater Norwich Joint Core Strategy (March 2011) as amended January 2014
- The Development Management DPD - Adopted August 2015
- The Site Allocations DPD – Adopted May 2016
- The Greater Norwich Joint Core Strategy

4.3 The Greater Norwich Joint Core Strategy (2011), or JCS as it is commonly referred to, is a strategic Development Plan Document which covers the administrative area of three Local Authorities, Norwich City Council, Broadland District Council and South Norfolk District Council and was originally adopted by all three councils in March 2011 and covers the period from 2008 – 2026.

4.4 A subsequent legal challenge to the High Court however resulted in the Broadland part of the strategy being re-examined and re-evaluated. Ultimately the same strategy for growth as originally proposed was maintained which shows the North East Growth Triangle accommodating major strategic growth, 7,000 dwellings, with a small sites allowance, 2,000 dwellings, being distributed within the remainder of the Norwich Policy Area (NPA). A public examination into this submission document was held in 2013 and the Inspector found the proposals for the Broadland part of the NPA to be sound. The Joint Core Strategy: Broadland part of the Norwich Policy Area Local Plan was subsequently adopted by Broadland District Council, Norwich City Council and South Norfolk Council on 10th January 2014.

4.5 Section 6 of the JCS deals with Policies for Places and includes policies 9 to 19. It sets out the overall growth requirements for the Greater Norwich Area and separates this into the Norwich Policy Area and the Rural Area for Broadland and South Norfolk.

4.6 The JCS makes provision for major growth in the Greater Norwich Area. Overall during the plan period, 37,000 new dwellings are to be provided and an additional 27,000 new jobs in locations that will have minimum adverse environmental impact.

4.7 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 need to be provided. The policy identifies a hierarchy of settlements over which this growth will be spread comprising of the Norwich Urban Area, followed by main towns including Aylsham, Diss, Harleston and Wymondham, Key Service Centres (KSC’s), service villages and other villages. The scale of development that may occur decreases with each level of the hierarchy. It is stated the smaller sites in the NPA that fall within Broadland will accommodate up to 2000 dwellings, being distributed within...
the remainder of the NPA. These housing figures are expressed as minimum figures.

4.8 JCS policy 12 deals with the remainder of the Norwich urban area and identifies Drayton as one of 10 urban fringe parishes. Significant growth is expected to take place in the Growth Triangle however throughout the suburban area and the fringe parishes opportunities will be sought;

“... to identify land to contribute towards the smaller sites (2000 dwellings) allowance set out in JCS policy 9...”

4.9 Other objectives of this policy include;

- the protection, maintenance and enhancement of green infrastructure links between currently fragmented habitats and the rural fringe and
- The policy also anticipates that construction of the NDR will reduce the impact of traffic on residential areas and allow significant enhancement of public transport, walking and cycling.

4.10 Other policies within the JCS of relevance to this proposal include;

- **JCS1** Addressing climate change and protecting environmental assets: New development is required to be sensitive to climate change and to promote sustainability. Development should be well located and designed to use resources efficiently.
- **JCS 2** Promoting Good Design: All new development should be designed to the highest standard to create a strong sense of place.
- **JCS3** Energy & Water: Major developments will need to demonstrate the effort made to maximise the provision of energy from low carbon energy sources and the steps taken to maximise opportunities for sustainable construction.
- **JCS4** Housing Delivery: All new development will need to provide a mix of housing to provide balanced communities and to meet the needs of the area, including provision of affordable housing and an appropriate tenure mix. On sites of 16 dwellings or more (or over 0.6ha) the proportion of affordable housing target is 33%.
- **JCS6** Access & Transportation: The transportation system will be enhanced to develop the role of Norwich as a Regional Transport node. Development will be concentrated close to essential services and facilities to encourage walking and cycling as the primary means of travel with public transport for wider access.
- **JCS7** Supporting Communities: New development proposals are expected to maintain and enhance the quality of life and well being of existing communities, to promote equality and diversity and to protect and strengthen community cohesion.
- **JCS8** Culture, Leisure & the Environment: The cultural opportunities offered are an important and valued part of the area. Existing cultural assets and leisure facilities will be maintained and enhanced including access to green space, formal recreation, country parks and the wider...
countryside.

JCS12  Identifies Drayton as one of 10 Urban Fringe parishes. The policy indicates that opportunities will be sought throughout the suburban area and the fringe parishes to contribute towards delivering the ‘smaller sites in the NPA’ allowance (2,000 dwellings -Policy 9)

JCS20  Implementation: A co-ordinated approach will be taken towards the provision and maintenance of infrastructure services and facilities to support development. Provision will be achieved by contributions from all residential and commercial development through CIL and appropriate S106 contributions.

JCS21  Implementation of proposals in the Broadland part of the NPA: A positive approach will be taken when considering development proposals in the BDC part of the NPA reflecting the presumption in favour of sustainable development as outlined in the NPPF. The Council will work pro-actively with applicants to find solutions to ensure wherever possible proposals are approved. Planning applications that accord with the policies in the JCS will be approved without delay. Where there are no policies relevant to a particular application or the policies are out of date at the time of decision making the Council will grant planning permission unless material consideration indicate otherwise including identifying specific policies within the NPPF that indicate that development should be restricted.

Broadland District Council - Development Management Policies DPD - August 2015

4.11  The Development Management DPD (DM DPD) was adopted by BDC on August 3rd 2015.

4.12  The DM DPD seeks to further the aims and objectives of the NPPF and the JCS. It does not repeat the policies of these documents but sets out more detailed local policies for the management of development. Those policies of relevance to this proposal include the following;

   GC1  Planning applications that meet the requirements of sustainable development as outlined in the NPPF and that accord with the policies of the DPD will generally be supported and approved without delay.

   GC2  New development should be accommodated within the settlement limits identified on the proposals map. Outside these limits development that does not result in any adverse impact will be permitted where it accords with a specific allocation and/or policy of the development plan.

   GC4  Development will be expected to have a high standard of design and avoid any significant detrimental impact. Proposals should pay regard to a number of specific criteria including local character and environment, accessibility, meeting amenity requirements, creating safe environments, incorporating appropriate infrastructure etc.

   EN1  Requirement for development proposals to protect and enhance the biodiversity of the district. Specific criteria need to be met if harmful
effects occur including provision of mitigation, demonstrating that the benefits of the development outweigh the harmful etc.

**EN2** Requirement for all development proposals to have regard to the Landscape Character Assessment DPD. Specific criteria requirements include the need to have regard to gaps between settlements, visually distinctive skylines etc.

**EN3** Requirement for all development to maximise opportunities for well managed network of wildlife habitats. Residential development of 5 dwellings or more required to provide at least 4ha of informal open space per 100 population and at least 0.16 ha of allotments per 1000 population. Appropriate arrangements will need to be made for the management and maintenance of green infrastructure.

**EN4** Requirement for all development proposals to make an adequate assessment of potential pollution and, if required, proposed mitigation measures. Development will only be permitted if no adverse impact on amenity, human health or the natural environment.

**RL1** Requirement for all new residential development of 5 or more dwellings to make adequate provision and subsequent maintenance arrangements for recreation. Formal recreation provision should amount to 1.68ha / 1000 population and provision of children's play space should equate to at least 0.34ha/1000 population.

**TS1** Safeguarding of land required for the improvement of the transport network.

**TS2** Requirement for major development proposals to submit a Transport Assessment and/or Travel plan.

**TS3** Development must not lead to any adverse impact on the satisfactory functioning or safety of the highway network.

**TS4** Requirement for new development to provide appropriate parking and manoeuvring space to reflect the use and location as well as its accessibility by non car modes.

**CSU4** Provision of waste collection and recycling facilities within major development.

**CSU5** Surface Water Drainage. Development must, as appropriate, incorporate mitigation measures to reduce surface water run off, manage surface water flood risk to the development itself and to others, maximise the use of permeable materials to increase infiltration capacity, incorporate on site water storage and make use of green roofs and walls wherever reasonably practical.

**BDC - Site Allocations DPD - May 2016**

4.13 The Site Allocations DPD (SA DPD) was formally adopted by Broadland District Council on May 3rd 2016. In addition to identifying or allocating areas of land for specific types of development such as housing, employment, community facilities etc. the SA DPD also includes the definition of development boundaries or settlement limits for those places...
where some further “infill” development may take place.

4.14 The application site lies just outside but immediately adjacent to the southern boundary of the settlement limits identified for Drayton within the SA DPD. The site has not been allocated for development within the SA DPD.

Drayton Neighbourhood Plan – July 2016

4.15 Drayton Neighbourhood Development Plan (NDP) was fully adopted by Broadland District Council on 26th July 2016 following an 89% vote by Drayton residents.

4.16 The Plan covers the period up to 2026 and now forms part of the development plan for the District and is one of the main considerations in determining any future planning applications submitted in Drayton.

4.17 The aim of the Plan is to set out a number of simple and practical policies that can add local detail and depth to more strategic documents such as the Joint Core Strategy in order to address specific local issues.

4.18 The plan sets out as its vision the following:

"The vision of the community of Drayton is based on their desire to maintain the quality of life in their Parish by preserving the balance between the built and green environment, improving negative elements of the built environment and infrastructure whilst developing and strengthening opportunities for the people of the parish, encouraging increased prosperity, and building up the facilities available to residents, and those that work here”

4.19 A number of objectives are identified within the plan to address issues identified as specific to Drayton and to provide the basis for the policies set out in the plan. These objectives include;

Objective 1. Preserving the character of the settlement, including the spatial balance between the rural and built environment, historical assets and character whilst improving design based on local vernacular style.

Objective 2. Protecting and enhancing resources available for sports, leisure, community and educational activities.

Objective 3. Facilitating improvements in road transport, traffic, and parking.

Objective 4. Improving the management and possibly increasing the provision of public green spaces of different kinds.

Objective 5. Supporting businesses and local employment.

Objective 6. Improving access and use of route-ways through both urban and countryside for pedestrians and cyclists.

4.20 Policies within the NDP that are considered most relevant to this application are as follows:

Policy 1a: Design Standards and Land Use mix

Development proposals must demonstrate how a high standard of design, sustainability and innovation will be achieved. Proposals which reflect the historic character of Drayton will be supported.
Policy 2a: Historic Character

Development proposals that use traditional building materials found in Drayton will be supported.

Policy 3: Important Views

Maintaining important views- in the instance of this application- View of St Margaret's Church tower from routes into the village and from around the village centre.

Policy 5: Flooding

Development proposals that fall within the Drayton Critical Drainage Area as identified in the Norwich Surface Water Management Plan must be accompanied by a Flood Risk Assessment which considers surface water flooding.

Policy 7: Improved Walking and Cycling Routes

Development proposals which would provide or help to provide improvements to the network of footpaths in Drayton will be supported- in the instance of this application- Contributing towards the creation of a new contiguous route running from the Low Road in the village centre to Drayton Wood and Canhams Hill and onwards to Hall lane, School Road and Drayton Dreway and the Marriotts Way.

Policy 9: Increased use of the King George V Playing Field.

Development proposals which would provide new or improved facilities likely to increase the use of King George V Playing field will be supported.

Other Material Considerations

National Planning Policy Framework (March 2012)

4.21 The National Planning Policy Framework (NPPF) was published in March 2012 and sets out the Governments’ planning policies for England and how it is expected these will be applied. It is a material consideration in determining planning applications. The following is felt to highlight some of the text and policies most relevant to this application.

Sustainable Development

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

4.23 Paragraph 17 of the NPPF identifies the 12 core principles of planning that should underpin both plan making and decision taking. Of particular relevance to this...
application are the following:

• the need to have an up to date local plan in place
• planning should be proactive in driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs.
• there is an obligation to identify and meet the housing, business and other development needs of an area
• planning should ensure the delivery of high quality design and a good standard of amenity.
• planning should contribute to conserving and enhancing the natural environment and reducing pollution
• promote mixed use developments and encourage multiple benefits from the use of land in urban and rural areas
• planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant developments in locations which are or can be made sustainable.
• Delivering sustainable development is a fundamental requirement of planning.

Promoting sustainable Transport

4.24 All developments which generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Applications should also be assessed to ensure opportunities for sustainable transport have been adequately taken up and that safe and suitable access is provided to meet the needs of the whole community. Development should be designed to give priority to pedestrians and cyclists, minimise the conflict between traffic and cyclists/pedestrians, have access to public transport and create safe and secure layouts.

Delivering a wide choice of quality homes and Housing Land Supply

4.25 Great emphasis is placed by the Government on the need to boost the supply of housing. The NPPF specifies a number of requirements that Local Planning Authorities are expected to fulfil including;

- ensure that their local plan meets the full objectively assessed needs for market and affordable housing in the housing market area.

4.26 Identify and update annually a five year housing land supply with an additional buffer of 5%, or in the case of persistent under delivery the buffer should be increased to 20% (paragraph 47).

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

4.28 Section 7 below discusses in more detail the current housing land supply within the NPA
as set out in the most recent Greater Norwich Growth Board Annual Monitoring Report (GNGB AMR) 2016.

**Good Design/ Community Engagement**

4.29 Good Design is regarded as a key aspect of sustainable development indivisible from good planning and should contribute positively to making places better for people. Applicants are expected to work closely with those directly affected by their proposals and allow the views of the community to shape the designs that emerge. Proposals that can demonstrate that engagement with the local community has helped shape the design of the new development should be looked upon more favourably (paragraph 66).

**Promoting Healthy Communities**

4.30 Planning policies and decisions should aim to achieve places which promote "Safe and accessible developments, containing clear and legible pedestrian routes, and high quality open space, which encourage the active and continual use of public areas" (paragraph 69)

4.31 Having access to high quality open space and opportunities for sport and recreation can make an important contribution to the health & well being of communities(paragraph 73).

**Climate Change/Flood Risk**

4.32 New development should be planned in locations and ways which reduces greenhouse gases (paragraph 95), avoids increased vulnerability to the range of impacts arising from climate change (paragraph 99) and wherever possible new development should be to be free of and not contribute to flood risk elsewhere (paragraphs 100 & 103).

**Conserving & enhancing the natural environment**

4.33 Conservation and enhancement of the natural and local environment can be achieved through a number of means including;

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

**Planning Practice Guidance**

4.34 On March 6th 2014 the Department for Communities and Local Government (DCLG) launched the Planning Practice Guidance as a web based resource. This is a purely online facility that replaces all previous planning policy guidance documents. The NPPG has been set up so that it can be easily cross referenced with the relevant policies contained in the NPPF.
For the purposes of this application the guidance categories referred to in the NPPG identified as most relevant to this application include;

- Before submitting an application
- Community Infrastructure Levy
- Design
- Environmental Impact Assessment
- Housing and economic land availability assessment
- Local Plans
- Making an application
- Natural Environment
- Open space, sports and recreation facilities, public rights of way and local green space
- Planning Obligations
- Travel Plans, Transport Assessments and Statements in decision taking
- Water supply, Waste-water and Water Quality

Other Documents

Other documents of relevance to the application include the following; the Broadland Landscape Character Assessment (2014), Broadland Parking Standards (2007), Affordable Housing SPD (2008) and Recreational Open Space (2015). All of these documents form Supplementary Planning Guidance and are material considerations when determining planning applications and should also be taken into account in the preparation of development proposals.

Localism Act 2011

The Localism Act 2011 states that local planning authorities should have regard to any local finance consideration so far as is material to the application. While financial considerations should not solely determine any applications for planning permission it is worth noting that the proposed scheme will be subject to the New Homes Bonus and also provide a Community Infrastructure Levy contribution of £764,426.22 (excluding rented affordable housing units). Due to the existence of the Neighbourhood Plan the Parish Council are entitled to 25% (£191,106.55) of the CIL contribution to be used for schemes within the parish.
Site Specific Considerations

5.1 This section examines the suitability of the application site in the context of the planning policies and the site specific considerations. It will be demonstrated the application complies with all the relevant policy requirements and the reports and assessments that accompany the application provide evidence that there are no technical issues that would prevent the development of the site. Implementation of the proposal will bring several benefits to the local area including the delivery of much needed new housing including affordable homes and additional public open space.

Design and Layout

5.2 This is a detailed application for the development of 74 dwellings, varying in size from one bedroom to five bedrooms, together with vehicular access to the site and provision of on site public open space.

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

5.4 A landscape and visual impact assessment has been carried out and is included with this application. This has identified the characteristics of the area and has underpinned the work on preparing the layout.

5.5 The accompanying Design and Access Statement addresses and demonstrates in full the process of assessment, evaluation and design of the proposed development; the approach towards the development's design has been comprehensive and inclusive, having regard to the adjoining development and the impacts of the A1067 Drayton High Road. From this process the submitted scheme has emerged and it is considered to be a contextually appropriate, sympathetic and sustainable development in response to the constraints, characteristics and opportunities arising. As such, the proposed development is considered to meet the objectives of the NPPF and relevant policies of the Development Plan insofar as they relate to design.

Housing Mix

5.6 As required by Policy 4 of the JCS the scheme will incorporate a variety of house sizes for a range of households in line with market demand and housing need as identified by Broadland District Council. The scheme is proposing in total 74 dwellings and the final mix of dwellings consists of the following:

- 16% (12 no.) one bedroom properties including one first floor apartment (Plot 72)
- 24% (18 no.) two bedroom properties including one first floor apartment (Plot 66)
- 31% (23 no.) three bedroom properties
23% (17 no.) four Bedroom properties
5% (4 no.) five bedroom properties

5.7 Policy 4 of the JCS also includes the requirement for a development of this size to make provision for 33% affordable housing. Twenty four of the proposed dwellings will therefore be affordable units in the following mix of size and tenure as agreed with BDC Housing officer.

1no. one bed apartment (Shared Equity)
7no. one bed houses (Affordable Rent)
4no. one bed houses (Shared Equity)
4no. two bed houses (Affordable Rent)
5 no. two bed houses (Shared Equity)
2no. Three bed houses (Affordable Rent)
1no. Three bed house (Shared Equity)

Highways and Transport

5.8 The NPPF sets out its policy requirements in relation to traffic and transport in paragraphs 29 -41 while JCS policy 6 Access and Transportation and BDC Development Management DPD policies TS1 – Travel Plans and Transport Assessments, TS3 Highway Safety and TS4 Parking Guidelines set out the local requirements that new developments are expected to meet with regard to traffic and transportation. The primary policy objective is to promote more sustainable transport and to ensure development proposals are capable of being served by safe access to the highway network without detriment to the existing amenity or character of the surrounding area.

5.9 A Transport Statement (TS) supporting the application has been prepared by ASD Engineering. The TS provides an independent and comprehensive review of all transport issues relating to the proposed development and the emphasis is on ensuring that the non-car modes can easily and safely be used to access local schools, amenities and local facilities.

5.10 The main vehicular, cycle and pedestrian access to the site will comprise of a type 3 standard access road, incorporating a 4.8m carriageway and 1.5m footways either side of the road, forming a priority junction arrangement with Drayton High Road. The new access will necessitate the relocation of an existing bus stop currently located alongside the site frontage. Agreement has been reached through discussions with NCC Highways Department on the revised location of the bus stop further along Drayton High Road to the south-east as shown on submitted Drg. No. 1304/HWY/043. Provision is also made for a new pedestrian/cycle link between the site and Fairview Close to the west. Overall the proposed scheme integrates new and existing walking and cycling routes to encourage pedestrians and cyclists.

5.11 The site’s location is close Drayton’s centre with essential services and facilities sufficiently close to encourage walking and cycling as the primary means of travel. The local transport network including public bus services, as well as to amenities and
facilities such as schools, shops etc. in Taverham and Norwich city centre found approx. 3km and 6km distance from the site respectively.

5.12 Further information and a more detailed discussion of the transport and access considerations relevant to this proposal is found in the accompanying Design & Access Statement and the TS. In conclusion the proposed scheme is located in a sustainable location and is afforded excellent vehicular, pedestrian and public transport links.

Drainage/Flood Risk and Services

5.13 As discussed above in Section 4 there are a range of National and Local Development Plan policies concerned with the need to address the flood risk of new development and the protection of surface water and ground water. Section 10 of the NPPF paragraphs 93 to 108 deals with the issues of flood risk together with climate and coastal change. Similarly JCS policies 1 and 3 and Development Management DPD Policy CSU5 Surface Water Drainage set out the requirements of the LPA with regard to new development and Flood Risk. One of the main requirements is the need for a site specific Flood risk Assessment (FRA) which takes account of future climate change. It is also expected that appropriate surface water drainage arrangements for dealing with surface water run off from new development should be provided including, if possible, the use of Sustainable Drainage Systems (SuDS).

5.14 ASD Engineering were commissioned by Norfolk Homes Limited and Norfolk land Limited to carry out a FRA for the proposed residential development of the application site.

5.15 The report confirms the site is located within the NPPF Flood Zone 1, and the NPPF states that all uses of land are appropriate in this zone. There is currently no significant flood risk at the application site.

5.16 A strategy has been produced to demonstrate that a sustainable drainage system (SUDs) can be provided on this site. The proposals are shown on drawing 1304/DRA/301 (Appendix H of the Flood Risk Assessment and Drainage Strategy). The principles by which it is proposed the drainage system will operate are as follows:

- Soakaways
- Permeable Paving

5.17 A conventional piped system will be used to collect surface water from the highway and connections from the permeable paving under-drains and overflows from the soakaways. The surface water will be stored within over-sized pipes and attenuation tanks, out-falling at a previously agreed controlled discharge rate (10 l/s) to the Anglian Water surface water sewer in Low Road which discharges to the River Wensum. A series of flow control devices will be employed within the site in order to hold water back higher up the system, necessitated by the sloping site.

5.18 It is proposed that this piped system and the storage tanks will be adopted by Anglian Water and will therefore be designed to the standards set out in Sewers for Adoption 6th Edition. This means that the pipe system will be designed to accommodate a 1:100 year event, plus an additional allowance of 40% for possible future climate change.
5.19 The system for surface water drainage will comply with the NPPF. In particular, the following will be achieved:

- Replication of, or indeed a reduction of, pre-development run-off rates.
- Less than 2 l/s/ha discharges for the increased volume created by the development, based on the 100 yr. 6hr event.
- Minimal discharge for rainfall events up to 5mm.
- Safe routing of flows unable to enter the adoptable system, such as those generated by rainfall greater than 50mm/hr.

5.20 There will therefore be no significant increase in flood risk due to the construction of the proposed development.

5.21 The proposed system of surface water management and disposal will ensure there is no significant flood risk to downstream land owners. The findings, analysis and conclusions of the Flood Risk Assessment and Drainage Strategy Report prove that it is possible to provide a foul and surface water drainage scheme that is fit for purpose in terms of use, and fully in accordance with the latest policies on Sustainable Drainage. A detailed design is anticipated to be required to satisfy the Conditions of any planning consent granted.

5.22 In respect of foul water drainage Anglian Water have undertaken hydraulic modelling work as connection to the existing system without mitigation works could lead to flows exceeding the system capacity. In order to mitigate the impact of the proposed development upon the sewer network the following is proposed:

- Provide off-line storage of 39m$^3$ within the open space area in the north-west corner near Fairview Close.
- Within Drayton High Road upsize 24m length of 300mm diameter sewer to 600mm diameter.

5.23 Anglian Water has also confirmed that the foul drainage from the proposed houses is within the catchment of Whitlingham Trowse Water Recycling Centre, which has capacity to treat the flows.

5.24 The proposed development is therefore compliant with the relevant policies of the Development Plan.

Landscape & Visual Impact Appraisal

5.25 Current local plan policy concerning landscape considerations is provided by policy ENV2 of BDC DM DPD and the BDC Landscape Character Assessment SPD (2104). Policy ENV2 sets out a requirement for all development proposals to have regard to the Landscape Character Assessment DPD and sets out specific criteria that development proposals are expected to observe.

5.26 The LVIA accompanying the application assesses in detail the proposed development against these policy requirements and a summary of the main points of the report is given below.
5.27 The LVIA explains that in recent years national planning policy discourages the use of local landscape designations and these have now been revoked in many parts of the country. Details are provided of landscape value criteria that have been developed that provides a reasonable scale against which any landscape area or feature can be assessed. It is confirmed that no statutory landscape designations such as AONB or National Park affect the site. Previously the Broadland District Local Plan (Replacement)2006 included local landscape designations such as the Wensum River Valley however these have now been superseded by policy ENV2 of the BDC DM DPD which takes a criteria based approach.

5.28 The site is described as being generally well contained in the landscape by existing residential development and boundary planting. It is established that the site lies outside Local character Area A1: Wensum River Valley and instead lies within the adjoining urban area. The sensitivities and the landscape planning guidelines identified for Area A1 cannot therefore be applied to the assessment of the development proposal. The site slopes away from the valley towards the urban area and is isolated from the valley by the tree belt along its southern boundary. Paragraph 5.5.2 states “....The continuous noise of traffic and the proximity of the urban area undermines any sense of tranquillity. There is no public access to this land and its only real value in landscape terms is in providing an open outlook to the existing residential properties on its northern and western boundaries...”. The site itself and associated landscape features i.e. trees, hedges, etc. are therefore assessed as only having Local Landscape Value.

5.29 The report goes on to assess the Landscape Susceptibility of the site and reiterates the site relates well to the village of Drayton. The established tree line along the southern boundary provides an effective screen and buffer to the valley landscape and the farmland to the south. The proposal allows the retention of existing landscape features on and around the site such as trees and hedgerows. Only a small number of trees along the north eastern boundary will need to be removed to accommodate the new vehicular access.

5.30 In terms of landscape susceptibility it is concluded “... Overall the application site is capable of absorbing residential development on the scale proposed without giving rise to unacceptable effects on the character of the wider landscape...”

5.31 The overall magnitude of landscape effects of the development proposal is judged against a number of considerations including, the effect on existing landscape features. In this instance the effect is found to be Low geographical extent over a Long Term Period.

5.32 In terms of effect on exiting landscape character the development will result in the loss of 3.0 ha of agricultural land to residential development and is therefore assessed as having a High adverse scale of effect on the character of the development site itself but over a Low geographical area. Importantly the scale of effect on the wider landscape i.e. the adjoining Wensum River Valley landscape would be Low adverse and of Low/Medium geographical extent. Furthermore any adverse effects are likely to be seasonal only, being limited to the period when there are no leaves on the boundary trees.
5.33 A whole site Phase 1 Habitat Survey was undertaken during July 2016 by James Blake Associates in order to satisfy National and DM DPD policies EN1 and EN3 requirements. The following text provides a summary of the main findings and a full copy of the report is included with the application documents.

5.34 The desk study identified one statutory designated site within 2km of the site: River Wensum Site of Special Scientific Interest (SSSI). No additional statutory sites were found within a 7km radius search area. Seven non-statutory conservation sites were identified within 2km of the site, six of which were County Wildlife Sites and one a Roadside Nature Reserve (RNS).

5.35 The majority of the site comprised an improved grassland field with signs of being grazed and mown.

5.36 None of the hedgerows found along the north western and north eastern boundaries of the site are likely to be classed as important under the 1997 Hedgerow Regulations. The majority of trees within the site boundary are considered to have little or no bat roost potential although four trees to the east of the site are considered to have low to high bat roost potential. A brick wall located along the south-eastern boundary of the site is identified as providing further opportunities for crevice roosting bats.

5.37 The site is considered to provide suitable foraging habitat for bats with hedgerows and adjacent tree belts and woodlands also providing potential commuting routes to woodland habitats to the south east and riverine habitats to the west and south west. Provided the development in limited to the improved grassland it is unlikely that foraging bats, if present in the local area would be affected by the proposed development. Further guidance is offered on lighting minimisation precautions to minimise the risk of disturbance to foraging and commuting bats on the site. The survey recommends that four trees identified on the Habitat Plan 1 as T1 – T4 be surveyed further for bats if they are impacted in any way by the development proposals.

5.38 The Phase 1 survey identified that the site contained suitable habitat for reptiles therefore a follow up Reptile Survey was undertaken by JBA consultancy during September/October 2016. The report confirms that no reptile species were recorded using the site during the survey period. No mitigation or constraints to the development apply to the site therefore with respect to reptiles.

5.39 The survey indicates that protected or rare birds are unlikely to be impacted by the proposed development if it is confined to the grassland areas. It is recommended that trees/hedgerows proposed for retention be protected during construction works and enhancement features such as nest boxes are recommended for house sparrows, starlings and swifts.

5.40 There are no ponds within 500m of the site making it unlikely that amphibians would migrate to the site and the desk study did not highlight any records of protected or rare amphibians within 2km of the site.

5.41 The survey found the site was not likely to support a large number of invertebrates, neither was there any evidence found during the site visit of foraging badgers or hedgehogs. The report makes a number of recommendation with regard to existing and proposed landscaping to provide foraging and commuting routes for badgers and
Due to the modest scale of the proposal the report establishes the development is unlikely to adversely impact on the nearby River Wensum SAC located 220m to the south of the site. Additionally, the provision of green infrastructure as part of the proposal, including the creation of a footpath to provide part of the “missing link”, will not only help mitigate any impacts of visitor pressure upon the N2K sites but would also give direct benefits to both the new and existing residents in Drayton.

**Trees and Arboricultural Impact Assessment**

A detailed tree survey of the site was undertaken by Oakfield Arboricultural Services and the accompanying tree survey schedule identified 20 individual trees, two groups of trees, one hedgerow and one woodland.

The vegetation mainly comprises native species and are limited to the site boundaries. The report finds that overall they offer good value although a number of trees were found to be in a poor condition and should be removed regardless of the proposals.

In order to accommodate the creation of the new access to the site T1 and G2 (comprising 3 individual trees) will need to be removed. These are considered to be of low quality and their removal therefore is not a constraint.

Foundations, hard surfaces and services are to be located outside of any measured root protection area of the trees to be retained and therefore no specialist foundation, construction or installation methods are needed.

A tree protection plan (TPP) accompanies the AIA and indicates the trees to be retained, those to be removed, the precise location of the protective barriers and ground protection, service routing, areas designated for structural landscaping to be protected and suitable space for site materials storage and other construction related facilities.

The foot path length shown running through G1 should be constructed along the most appropriate route with regard to tree stem locations and allow for any necessary deviation to minimise tree loss. Construction should be of a no dig methodology to eliminate damage to roots.

Tree protection fencing will be required and should be installed pre-construction and post any works to trees. It should remain in-situ for the entire period of construction.

The AIA concludes the proposal will have no material effect on the health /retention of those trees to be retained or their amenity or landscape value as long as the recommended tree protection methods are adhered to.

**Archaeology**

An archaeological trial trench evaluation was carried out on the site by Pre-Construct Archaeology during early August 2016 and a copy of the written report as well as the trail trenching plan accompanies this application.

A total of 11 trenches distributed across the site were excavated and recorded. The principal result of the evaluation was the discovery of two Roman ditches in a narrow band along the southern edge of the site. The quantity of pottery present suggests that
a Roman settlement may be in the vicinity of the site, possibly to the east or south-east. Two small pits containing Iron Age pottery were also uncovered in the south eastern corner of the site, indicating Iron Age activity previously unknown in Drayton. Intense post-medieval quarrying for sand was present in the eastern side of the site. This represents the densest area of archaeology and the quarrying activity would have removed any traces of earlier activity.

5.53 A copy of the trial trenching report has been sent to NCC HER for information/comment.

Services

Telecommunications

5.54 Connection to the BT Openreach network is available. Fibre optic broadband should be available for the proposed housing.

Electricity

5.55 UK Power Networks have confirmed a high voltage cable within Drayton High Road. Additionally, low voltage cables are also within Drayton High Road and Fairview Close.

Gas

5.56 There is a 6 inch steel low pressure gas main and associated equipment within Drayton High Road passing the proposed entrance into the site. There is also a 4 inch low pressure main in Fairview Close.

5.57 Servicing the site with the relevant utilities can be achieved with current networks.

Conclusion

5.58 Overall, the proposed scheme is compliant with the relevant Development Plan policies relating to site specific considerations.
6 Appropriateness of the Site for Development

6.1 JCS Policy 9 specifies 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 minimum of 21,000 dwellings will need to be provided. The policy identifies a hierarchy of settlements over which this growth will be spread comprising of the Norwich Urban Area (including the fringe parishes), followed by the only main town, Wymondham within the NPA.

6.2 Drayton as a fringe parish is identified Policy 9 as being in the highest category of settlement for meeting housing needs requirements.

6.3 Additionally, under JCS Policy 12 the Broadland part of the NPA includes proposals for 7,000 dwellings with the “Growth Triangle” and the further smaller site allowance within the Broadland NPA of 2,000 dwellings for distribution amongst the Norwich fringe parishes, Key Service Centres, and service villages. The proposed scheme offers an opportunity within an identified fringe parish to contribute to the housing needs of the area and help meet the requirements for smaller sites in Broadland.

6.4 The site is immediately deliverable and can, therefore, make a substantial contribution towards providing a five year supply of deliverable housing sites. Furthermore, the intended house builder is a joint applicant who have a proven record of delivering sites within Broadland. In respect of JCS Policy 4 the proposal will provide a mix of house types and sizes, sufficient to contribute to meeting the diverse needs of the community, including first time buyers, family accommodation and those seeking affordable housing. The scheme includes 24 no. affordable homes, compliant with the policy, and the mix of tenure and dwelling types has been agreed with Broadland DC.

6.5 The village has a good range of services and facilities, it is served by good bus services connections into the city centre. Most essential services (GP Surgery, Junior School and shops) are within 1000m of the site; the centre of Drayton is approximately 500m away. Drayton Primary School is located approximately 1500m from the site, with a safe walking route between the two.

6.6 Being a fringe parish, Drayton is well located to employment providers within the other fringe parishes of Norwich, as well as the city centre.

6.7 The application site is exceptionally well related to the existing built fabric of the village and would have minimal impact on the landscape of the area (see submitted LVIA).

6.8 In terms of green infrastructure provision the most appropriate solution would be provision of open space on-site. Additionally, the suggested footpath link to the south of the site would open an opportunity to provide part of the east-west “missing” link identified in Policy 7 of the Drayton Neighbourhood Plan.

6.9 Having reference to the relevant policies of the Development Plan, in particular JCS policies 2 and 6 and Development Management DPD policies GC4, EN1, EN2, EN3, RL1, TS1, TS4 and CSU5 the detailed design of the proposal has evolved from assessment of the site, the context of the surrounding development and landscape to ensure these matters have been thoroughly considered and the scheme complies with the policies.

6.10 Notwithstanding the suitability of the site for housing development, the site is also able to deliver benefits to the local community in the form of affordable housing, comprising
33% of the proposed dwellings (24 units in total), public open space and an opportunity for public footpath links to the south of the village in the Wensum valley.
7 Five Year Housing Land Supply

7.1 Paragraph 47 requires Local Authorities to ensure they meet their full objectively assessed needs for market and affordable housing in the housing market area and identify and update annually a five year housing land supply (5YHLS) with an additional buffer of 5%, or in the case of persistent under delivery the buffer should be increased to 20%. Paragraph 49 states where a local authority cannot demonstrate a 5YHLS relevant policies for the supply of housing should not be considered up to date.

7.2 In the most recent Joint Core Strategy AMR (January 2016) the housing supply figure for the whole of the NPA is below five years. It is currently estimated at about 4.7 years of the required supply. The AMR also confirms that there is an even greater shortfall in the 5YHLS for the Broadland constituent part of the NPA; as at April 2016 this figure stood at 4.55 years of the total requirement.

7.3 In this situation where those policies for the supply of housing are out of date by virtue of paragraph 49 of the NPPF, paragraph 14 come into effect. The provisions of paragraph 14 stipulates there is a presumption in favour of sustainable development and this means that for decision taking;

“.. where the development plan is absent, silent or out of date granting planning permission: unless any adverse impact of doing so would significantly and demonstrably outweigh the benefit when assessed against the policies in the Framework taken as a whole or specific policies in the NPPF indicate development should be restricted...” (as identified in footnote 9).

7.4 It should be noted that none of the special considerations identified in NPPF footnote 9 apply to this site.

7.5 Given that there is a shortfall in the number of housing units required, the policies concerned with the delivery of housing in the JCS i.e. policies 4 (Housing Delivery), 12 (Strategy for growth in NPA) and 12 (development opportunities in the Norwich urban area, including the fringe parishes)) and the Development Management DPD policy GC2 (Location of New Development) are out of date in so far as they relate to the NPA and this application.

7.6 JCS policy 21 deals with the implementation of proposals in the Broadland part of the NPA. This policy firstly confirms that BDC will take a positive approach when considering development proposals that reflect the presumption in favour of sustainable development as outlined in the NPPF. Secondly where policies relevant to the consideration of the proposal are out of date at the time of making the decision the Council will then grant planning permission unless material consideration indicate otherwise.

7.7 A number of other reports and studies provide additional information and key statistics on the housing situation within the NPA and the Broadland Area and are considered to be of relevance to this application.

7.8 In the document "An Economic Assessment of Greater Norwich 2009- 2014 (2009)" it was identified at the time of publication that much of the housing growth within the Greater Norwich Area was taking place on brownfield sites within the Norwich urban area. The document confirmed however that future development, as the population...
continued to grow but the supply of suitable brownfield sites diminished, would have to take place outside the urban area.

7.9 The study also identified that there is a shortage of three and four bedroom houses in the Greater Norwich Area. Development in Broadland was typified as being primarily houses and large properties with proposed development at the time maintaining this pattern.

7.10 The Greater Norwich Area-Housing Land Supply Assessment (April 2016) confirms the housing land supply figures quoted above from the JCS AMR i.e. 4.7 years available within the NPA and 4.55 years in Broadland. The report shows that between 2016-2021 Broadland NPA has identified permissions that will deliver 5380 dwellings (including a projection of completions in the current year of 366).

7.11 The application site positively addresses all of these key issues. The site is in a very sustainable rural location well related to the existing settlement of Drayton which offers an excellent range of facilities and services to cater for everyday needs as well as having access to regular public transport facilities to the city centre. The housing element of the scheme can deliver 74 dwellings, of which 24 no. will be affordable homes, thereby making a valuable contribution to the local housing land supply. The applicants have an option on the land and one of the joint applicants is established and reputable local house builders who will be able to offer early deliver of dwellings once planning permission is granted.
Summary and Conclusions: Section 38 Balance

8.1 The application is accompanied by a full range of technical documents which demonstrate the proposed housing scheme can be delivered without any substantial negative impacts. In this respect the application is generally policy compliant.

8.2 At the heart of the NPPF is a presumption in favour of sustainable development which should be seen as the golden thread running through both plan making and decision making. Paragraphs 7 and 14 identify the three roles which together comprise sustainable development – economic, social and environmental roles. Paragraph 14 goes on to provide for proposals that accord with the Development Plan being approved without delay, unless material considerations indicate otherwise; and where relevant Development Plan policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF as taken as a whole; or specific policies in the NPPF indicate development should be restricted.

8.3 NPPF paragraph 47 calls on LPAs to boost significantly the supply of housing and to identify a 5YHLS of specific deliverable sites. This is with an additional buffer of 20% where there has been persistent under-delivery.

8.4 In relation to whether the proposal accords with the Development Plan, it is clear from case law that this determination is to be made with respect to the Development Plan as a whole. Thus where there is tension between relevant policies of the Development Plan, it is necessary to make a judgement on the overall compliance of the proposed development, also taken as a whole, by considering it in relation to all the relevant policies of the Plan.

8.5 In respect to paragraph 49 of the NPPF, it is clear with reference to the judgement in the case of Hopkins Homes, that any policies which ‘affect the supply of housing’ are to considered out-of-date where the LPA cannot demonstrate a 5YHLS. At the same time it is also established that those same policies continue to carry some weight with respect to those of their provisions which do not affect housing.

8.6 It is acknowledged by the Broadland DC that a 5YHLS cannot be demonstrated within the Norwich Policy Area. Policies relating to the supply of housing are therefore out-of-date, including JCS policies 4, 9, and 12, and Development Management Policies DPD policy GC2 in particular.

8.7 Turning to NPPF paragraph 14 and whether adverse impacts of the development would be significantly and demonstrably outweigh the benefits, assessed against the NPPF as a whole or whether specific NPPF policies indicate development should be restricted.

8.8 Nonetheless, the scheme for the dwellings is considered consistent with the settlement hierarchy, being located within a fringe parish.

8.9 The application site does not fall within any formal landscape designation nor a valued landscape (paragraph 109 of NPPF). The submitted LVIA identifies the proposed scheme would have limited impact on the character of the area. Recognising the intrinsic character of the countryside is one of the core planning principles at paragraph 17 of the NPPF. Whilst Development Management policy GC2 is consistent with the NPPF in that the identification of boundaries to settlements serves to protect the countryside, the
defined settlement boundaries are a fundamental part of the overall spatial strategy for the supply of housing within Broadland. In so far as they restrict the supply of housing in accordance with the spatial strategy. Consequently the settlement boundary for Drayton and policy GC2 are out of date.

8.10 Of particular relevance is the site’s ability to deliver 74 no. homes and, therefore, make a valuable contribution towards the requirement for a five year supply of deliverable housing sites. This and the provision of 24 units of affordable housing are matters of significant weight. Particularly given the Government’s emphasis on affordable housing but the latest AMR (December 2016) demonstrates a considerable under-delivery of only 40% of the annual target for affordable homes with the NPA.

8.11 On an overall balance of planning judgement, developing outside the settlement boundary is a conflict with the development plan. However, in these circumstances this adverse impact is not so great as significantly and demonstrably to outweigh the very considerable benefits of the development in providing needed homes in the face of the 5 YHLS shortfall.

8.12 The proposed scheme as a whole is to be regarded as sustainable development and should be granted permission in accordance with the presumption of the NPPF in its favour.