

## Examination of the Breckland Local Plan (2011-2036)

Matter 4– Housing: the supply of land for housing, deliverability  
and viability

Question 1.25 Is the assessment undertaken for the site LP[003]013 Land  
to the west of Grove Road and its findings robust?.



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**Matter 4 – Housing: The supply of land for housing, deliverability and viability**

**Question 1.25 Is the assessment undertaken for the site LP[003]013 Land to the west of Grove Road and its findings robust?**

These representations have been prepared by Cheffins Planning on behalf of Goymour Properties Ltd in response to the Inspectors Examination Question 1.25 that *“Is the assessment undertaken for the site LP[003]013 Land to the west of Grove Road and its findings robust”*. However, before commenting on the assessment undertaken by the Council and the related commentary it is important to state that an outline application for 45 dwellings with all matters reserved except for access at land to the west of Grove Road, Banham was submitted on the 23<sup>rd</sup> August 2018 and at the time of writing this statement the application is awaiting validation. It is anticipated that by the Hearing Session (18<sup>th</sup> September 2018) that the application will be awaiting determination.

Whilst the client was disappointed that the proposed site was not considered prior to the examination the subsequent consideration of the site is welcomed. In particular the acknowledgement that the site performs the equally when compared with the proposed allocation sites LP{003}009 and LP[003]012.

Referring specifically to the analysis of the site by the Council, there is a need to comment on some of the findings of the assessment which raise questions as to the robustness of the assessment. In terms of agricultural land classification the site actually scores more highly than the proposed allocation sites being Grade 3 Good to Moderate rather than Grade 2 Very Good. Although, it is recognised in Breckland that it is difficult to avoid the use of Very Good agricultural land. In addition, the negative comments regarding landscaping are contended with the site representing a self-contained site with existing built development to the north and south, with Grove Road comprising the eastern boundary and an existing hedge on the western boundary. As part of the development proposals the intention would be to reinforce the planting on the western boundary.

The positive assessment relating to this site are repeated within the Housing and Economic Land Availability Assessment. It is important to confirm that the site area is 1.621 hectares and the density of development is 28 dwellings per hectare. Due to the sustainability credentials of the site it is clear that the site is suitable for a density in excess of the 25 dwellings per hectare advocated by the Council for Local Service Centres. In addition, due regard needs to be given to paragraph 123 of the NPPF which seeks that development makes optimal use of the potential of a site, whilst also giving consideration to paragraph 122 which emphasises *“the importance of securing well-designed, attractive and healthy places”*. The conclusions within the HELAA accord with my client’s objections with regards to the failure to consider and allocate this site in that *“The site is considered suitable, available and achievable for residential development”*.

The proposed development of the site will accord with the comments contained in the Historic Characterisation Study in that the proposal will respect the setting of the Grade II Listed Grove Cottages in that the meadow and pond are to be retained as a focal point of the proposed development and will maintain the character and appearance of Grove Road. The pond is to be maintained as a landscape feature and the ponds and its environs will be safeguarded to ensure that the potential of this pond as a habitat for Great Crested Newts is maintained and enhanced. The strategic landscaping provided in relation with this development will ensure that key views of the site from Kenninghall Road are softened. It is important to note that the site is not located within the Conservation Area, and in any event is screened from to the east by the properties on the eastern side of Grove Road.

The recommendations of Norfolk County Council as Lead Flood Authority have been taken into account in the formulation of the development proposals and application is accompanied by a detailed Flood Risk Assessment. It is recognised that surface water drainage is a particular issue and the enlargement of the pond is not a viable option due to the potential harm this could cause to the habitat of the Great Crested Newts. As a result the site is to be drained by way of a borehole into the aquifer below the site. This is a similar situation which is used at the adjacent Banham Zoo. This will obviate the need to provide a connection to a watercourse which is indicated by NCC to be 300-500m from the site and will need to cross land which

#### Matter 4 – Question 1.25

is not in the ownership of the applicant. From the above it has been demonstrated that the surface water can be satisfactorily addressed.

The site will also be subject to the requisite surveys to confirm the presence or otherwise of contamination associated with the previous uses of part of the site. If contamination is identified the appropriate remediation will be undertaken prior to the occupation of the proposed dwellings.

The comments made by Norfolk County Highways Department are noted and cannot be accepted. The applicant owns land both sides of Grove Road and as part of the application proposals the intention is to widen Grove Road to 5.5m. This will be on land entirely within the ownership of our client. TAs stated these improvement works will be on land in the ownership of the applicant and will extend from the proposed access to the development site to the south to link to Kenninghall Road. The development proposals will also allow a 1.8m wide footway to be created on the western side of Grove Road. This will not only provide a safe pedestrian route for the occupiers of the proposed development but also the existing residents.

It is clear from the above that this proposal provides an appropriate solution to address the concerns of the highway authority, whilst also resulting in wider pedestrian enhancements.

Subject to the above comments being taken into account, it is clear that this site represents an appropriate site for residential development being closely linked to local services and facilities and is unquestionably suitable for allocations. This is emphasised by Council confirming that the site performs equally when compared with the proposed allocation sites LP{003}009 and LP[003]012. Without wishing to repeat the comments made relation Matter 14 – Question 14.35 the allocation of this site will result in a more balanced approach to housing across Banham and recognise that Banham compared with other Local Service Centres has a much wider range of facilities and employment opportunities to support additional growth.

In view of the above it is contended that this site should be included as an allocation in the Local Plan.