

Examination of the Breckland Local Plan (2011-2036)

Matter 14 – Strategic urban extensions, housing site allocations and settlement boundaries

Question 14.35 Banham – Is the settlement boundary for Banham justified?



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Matter 14 – Strategic urban extensions, housing site allocations and settlement boundaries**Question 14.35 Banham – Is the settlement boundary for Banham justified?**

This additional statement has been produced by Cheffins Development and Planning on behalf of Goymour Properties Ltd and Banham Zoo. In relation to Banham it is contended that the settlement boundary is being too rigidly applied. The arbitrary growth figure for Banham is also being too rigidly applied and it has not been justified as to how this figure has been reached. The limited level of growth proposed fails to recognise the wide range of facilities available in Banham as detailed at Section 9.2 of the Preferred Sites and Settlement Boundaries Consultation Part 1. More importantly whilst the retail area, containing grocery store and off-licence, hairdressers, craft shop, butchers, The Barrell – public house and a hot food takeaway have been used to justify the criteria as a Local Service Centre, this part of Banham is inexplicably excluded from the settlement boundary. These businesses are accommodated in a range of converted farm buildings and it is clear that these buildings and Banham Zoo opposite form the focal point of this part of Banham, to the south of Kenninghall Road and west of Grove Road.

No explanation or justification has been given as to why Banham Zoo and the retail area have been excluded. The Banham policies map fails to even show the Zoo and Grove Road and the settlement boundary effectively stops 200m from the Zoo and excludes the commercial area, shops and all of the residential development along Grove Road.

The land and built development associated with the Zoo and Grove Road is effectively the same area as that of the remainder of the village falling within the development envelope. The buildings associated with the Zoo are not temporary in nature and no explanation is given as to why the western part of Banham has been excluded and development is concentrated in one location close to the eastern part of Banham. The question has to be raised why is one half of Banham being treated differently to the other half?

The justification for allocating sites is also too focused on the distance from the primary school. Not all residents will have children and the distance from local shops, facilities and bus stops should also be considered. Banham Zoo is also a major employer and there is clearly a need for housing for employees of this facility. Whilst, my client has submitted representations in relation to a site at Grove Road, immediately adjoining the commercial area, this site has not been assessed. In the light of the above it is difficult to understand the Council's justification in how they have drawn the settlement boundary.

The approach being taken effectively prevents a more balanced approach to housing growth across Banham but also has the potential to severely restrict the growth ambitions of Banham Zoo by it being covered by particularly restrictive countryside policies.

It is considered that the plan fails to meet "The core principle of the NPPF, as set out in paragraph 17, requires that *"Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth."* In this instance Banham Zoo which is both a significant employer in both the Parish and District has effectively been ignored and no allowance has been made in housing figures and the settlement boundary of Banham to address the needs of the Zoo.

Also, paragraph 55 of the NPPF advocates that, *"to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities."* This is an important consideration and by locating development to the east of Banham it will result in the benefits of the limited housing proposed being further reduced due to the distance of the allocation sites from the facilities which have resulted in Banham being classified as a Local Service Centre.

The content of Policy HOU 03 Development Outside of the Boundaries of Local Service Centres is noted. However, it is contended that criterion 2 of this policy i.e. *"It would not lead to the number of dwellings in the settlement exceeding the housing target"* will effectively prevent sustainable development coming

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forward in locations outside the arbitrarily drawn settlement envelope and will not allow development which is of an appropriate scale and type to meet the needs of both the zoo and the Parish. The density of the allocated sites are being deliberately kept low resulting a in a focus on family homes. Finally, it should be emphasised that the housing requirements associated with the Local Plan should be seen as a minimum figure rather than a target which should not be exceeded in any circumstances.

In addition, the way that the settlement boundary has been drawn will prevent any land to the built up western part of Banham coming forward and will result in conflict with criterion of Policy HOU 03 in that no part of the zoo or the Grove Road commercial area “*..is immediately adjacent to the settlement boundary*”.

In view of the above it is maintained that the settlement boundary for Banham is not justified and should be amended to more effectively recognise the built environment of the village, including the Zoo, and potentially allocate land which is in close proximity to both the main retail and employment facilities.

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