

LAND AT YARMOUTH ROAD, BLOFIELD, NORFOLK, NR13 4JS

BROADLAND DISTRICT COUNCIL REF: 20111303

PINS REF: APP/K2610/A/12/2177219

**PROOF OF EVIDENCE ON BEHALF OF A.G.H SMITH, J.E SMITH, R.G SMITH &
SLA PROPERTY COMPANY LTD.**

Prepared by

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5.31 The appeal, if allowed, would make a contribution to delivering much needed affordable housing. It seeks permission for a maximum of 175 dwellings and, whilst the precise number would be determined by way of subsequent reserved matters applications, the maximum provision would be 58 affordable homes. This is, I believe, significant in the context of Broadland's recent rates of completion and a significant benefit of the scheme.

Deliverability

5.32 During the life of the application, concern was raised by the Council as to the deliverability of the scheme. The application is in outline with all matters reserved and commencement of development would inevitably need to await their approval. The nature of the applicant was also raised: the applicant is the landowner and a local construction company, but is not a 'recognised' national house building company.

5.33 These same issues – an outline application and an applicant that isn't a recognised national house builder - were addressed at the Costessey appeal (Appendix LM11). The Inspector's analysis, set out in paragraph 14 of her decision, is relevant. She concludes that such circumstances are '*not unusual*' and were not reason enough to suggest that development cannot contribute to the five year supply of housing. The alternative, to await adoption of the site specific policies DPD, would set delivery back still further.

5.34 The natural time lag between the grant of an outline planning permission and commencement on site needs to be weighed against the significant and long-standing deficit in housing provision and the contribution that the appeal site could make to addressing it.

5.35 The appellant had agreed at the application stage to a condition with a reduced time limit for the submission of the reserved matters applications if it would provide the Council with additional comfort vis-à-vis timely delivery of the project.

Conclusions

5.36 The appeal site would make a positive contribution to the significant deficit in the five-year supply of housing in the NPA. The site is available now, it offers a suitable location for development and new homes, both market and affordable, can be delivered within five years. The scale of development proposed – a maximum of 175 homes – would not

undermine the Spatial Strategy or Settlement Hierarchy of the JCS, which specifically identifies Blofield as a location for additional housing to deliver the 'small sites' element of the NPA allocation. Such sites were identified to provide flexibility in the short-term supply of housing and in recognition that allocations in the Strategic Growth Locations are dependent on new or significantly enhanced infrastructure to facilitate delivery. This is recognised at paragraph 7.14 of the JCS, where it is acknowledged that *'without the NDR the housing and employment growth in the Broadland part of the NPA cannot all be delivered'*.

5.37 The report to the April 2012 meeting of Norfolk County Council's Cabinet, suggests that the NDR will not be completed until 2017. This timescale is however based on a public inquiry taking place in the summer of 2012. The inquiry has been delayed and there is currently no revised timetable. It is safe to assume that the NDR will not be delivered until some time after 2017.

5.38 The Site Allocations DPD is at the pre-submission stage and is unlikely to be adopted until 2015. Awaiting the outcome of this process will only serve to further delay the delivery of the JCS housing requirements, exacerbating the already significant deficit in the five-year supply. The weight afforded the emerging DPD must be outweighed by the pressing need to address this deficit. The Inspector's assessment of the Costessey appeal reached the same conclusion despite the fact that adoption of the South Norfolk Site Allocations DPD (SSAP) is anticipated in 2013, significantly earlier than Broadland's: *'any argument that it would be premature is misplaced in view of the early stage of the SSAP'* (paragraph 15).

Issue 2: Is the proposed employment development appropriate in this location?

5.39 JCS Policy 5 identifies a need to provide a minimum of 27,000 new jobs in the period to 2026. Employment land is to be allocated to meet this need and particularly the needs of small, medium and start-up businesses. This will be addressed, in part, by allocating smaller employment sites and requiring the provision of small-scale business uses in all significant residential developments.

5.40 The major strategic employment allocations for Broadland are at Rackheath and the Broadland Business Park (25ha each). However, implementation is dependent on delivery of the NDR which, as set out previously, is unlikely to be delivered until after 2017.

- 5.41 The demand for small-scale, 'incubator' or 'seed-bed' accommodation is addressed in Mr Alan's proof of evidence. He concludes that there is a dearth of such facilities in the Norwich area and where smaller units have been offered, take-up is very high. He identifies a demand to the east of Norwich which is not met by the current large business park model.
- 5.42 Furthermore, Broadland's Economic Development Manager 'strongly supports' the inclusion of the employment element of the scheme. His consultation responses are included at Appendix LM13.

Issue 3: Does the proposed development constitute sustainable development?

- 5.43 The decision notice includes as a reason for refusal a failure to '*contribute towards achieving sustainable development*' with reference to '*the scale of the application and what it purports to provide*'. However, there is no clear indication of what is being referred to with reference to specific policies or guidance. Sustainability is also referred to in Generator Developments Statement of Case which suggests that the appeal site is not a sustainable location for development.
- 5.44 As set out previously, the JCS seeks to provide for a significant level of new development, particularly within the NPA. The Spatial Planning Objectives of the JCS include the allocation of sufficient land for new housing in the most sustainable settlements (Objective 2). Policy 1 seeks to address climate change by, amongst other measures, making the most efficient use of land and by minimising the need to travel and giving priority to lower impact modes of travel. Accordingly, the policies of the JCS distribute growth according to a settlement hierarchy which has Norwich and its urban fringe at the top, followed by the Main Towns then Key Service Centres, such as Blofield. Blofield is identified by Policy 14 as a suitable location for additional housing development, albeit at a relatively modest scale.
- 5.45 The appeal site is well located in relation to a range of existing services both in Blofield and the adjacent village of Brundall, as detailed in section 3 of my proof.
- 5.46 Blofield Primary School and Doctors' Surgery are located within 800m of the site. The Post Office, hairdresser, florist, pub and fish and chip shop are located closer still. There are a number of footpaths providing a direct route to the key facilities in the village. Brundall is located approximately 1.5km – 2km to the south of the site and offers two dental practices

