

Parish:	Northwold	
Proposal:	Phased development of 10 dwellings built to Passivhaus standards, using existing entrance from Jensons Way	
Location:	Jensons Way Whittington Norfolk PE33 9FT	
Applicant:	Councillor Tony White	
Case No:	21/02103/FM (Full Application - Major Development)	
Case Officer:	Lucy Smith	Date for Determination: 4 February 2022

Reason for Referral to Planning Committee – Called in by Cllr Ryves

Neighbourhood Plan: No

Case Summary

The application seeks full planning permission for the construction of 10 new dwellings to the rear of dwellings fronting Jensons Way, Whittington.

Key Issues

- Principle of Development
- Planning History
- Highway Safety and Access
- Design and Impact on Form and Character
- Impact on Neighbours and Residential Amenity
- Affordable Housing
- Other Material Considerations

Recommendation

REFUSE

THE APPLICATION

The application seeks full planning permission for the construction of 10 new dwellings to the rear of dwellings fronting Jensons Way, Whittington.

The site comprises approximately 0.85ha of agricultural land and stretches from the rear of houses fronting Jensen’s Way to the south to the A134 to the North.

An application for a similar scheme was refused under application 21/00460/FM in June 2021.

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SUPPORTING CASE

None received at time of writing

RELEVANT PLANNING HISTORY:

21/00460/FM: Application Refused: 28/06/21 - Phased development of 10 dwellings on land on Whittington Hill, using existing entrance and adopted entrance from Methwold Road - Jensons Way - Appeal Withdrawn 03/08/21; DELEGATED DECISION

20/00081/PREAPP: INFORMAL - Likely to refuse: 24/09/20 - PRE-APPLICATION ADVICE (OUTLINE WITH CONSULTATIONS AND A MEETING WITH A PLANNING OFFICER): 10 dwellings - Land Off Methwold Road

16/01159/RM: Application Permitted: 05/10/16 - RESERVED MATTERS: Construction of 5 dwellings including a site access road and all associated site works - Land South of Ashlee Methwold Road - COMMITTEE DECISION

16/00413/O: Application Permitted: 13/06/16 - OUTLINE APPLICATION SOME MATTERS RESERVED: Construction of 5 dwellings including a site access road and all associated siteworks - Land South East of Ashlee - COMMITTEE DECISION

RESPONSE TO CONSULTATION:

Parish Council: NO OBJECTION – stating the following comments:

'This application was discussed at our meeting last week and the Parish Council wish to say that they do not object but have made the following comments to be considered:-
The developer to pay for speed reduction on the A134 from the roundabout to the entrance to the estate and there are concerns over what "Social Housing" on the application means – are these to be available for rent or are they classed as affordable housing therefore privately owned.'

Local Highway Authority: HOLDING OBJECTION – the comments summarised as follows:

With reference to the application relating to the above development, you will be aware that the County Council has previously commented that the lack of transport sustainability for new development in Whittington should be taken into consideration. It remains the view of the County Council that due to the limited access to wider services and employment opportunities in Whittington, it remains a concern. Furthermore, the catchment primary school in Methwold is approximately 4.5km to the south.

Notwithstanding the above, should the Borough Council deem the principle of small scale development in this location to be acceptable (as shown on drawing 200 rev A), in relation to highways issues only, notice is hereby given that Norfolk County Council requests that the following amendment / additional information be submitted.

1. The existing junction has been constructed with 10m radii, which is excessive for this scale of development and could result in vehicles entering at an unacceptable speed. A junction radius of 6.0m would be more appropriate. The existing kerbing across the junction will also need to be removed and give way lines provided.

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2. The visibility splays from the junction onto Methwold Road should be secured in perpetuity by widening / re-aligning the frontage footway. This will prevent it from becoming overgrown due to the lack of maintenance, in the interests of highway safety.
3. The access road as constructed is 4.8m wide with 1.5m wide footways. The proposed estate road should therefore not widen to 5.34m as proposed. If sufficient space is available, footways should be widened to 1.8m.
4. The proposed estate road will need to be subject to a 20mph zone, the slight kink in the road alignment is unlikely to be sufficient to retain vehicle speeds at the appropriate level and will need to be tightened.
5. Junction radii measuring 6.0m will be required at the turning head.
6. If access to the retained land to the east of the turning head is to be provided, what is the proposed use of this land.
7. The road extends too far beyond the turning head.
8. All dwellings must have two parking spaces (excluding garages), which is not clear from the submitted layout plan. Where four-bedroom dwellings are provided that require 3 parking spaces, they should not all be end to end tandem spaces.
9. Vehicular access to plot 10 must be clear of the adjacent junction radii.
10. Garages serving as a the third parking space for a 4 bedroom dwelling must have internal dimensions measuring 3.0m x 7.0m.

In addition to the above, whilst the previous development of 5 dwellings on the site frontage has provided a 1.5m wide footway to the bus stop, I would expect a larger scale development to be required to extend this footway to Old Methwold Road. Where possible within the highway, it should also be 1.8m wide.

CSNN: OBJECTION, with the following comments:

The reason for our objection relates to the potential impact of noise from the A134, specifically on Plots 9&10 but potentially also on the outdoor amenity space of the remaining plots.

The submitted noise report is not sufficient to address these issues and makes no reference to any recognised guidance for the protection of amenity and sleeping spaces. Without such a report, undertaken by a suitably qualified and competent noise consultant, I cannot determine if the plots will be subject to excessive noise levels.

Environmental Quality: NO OBJECTION with regard to Air Quality or Contaminated Land. Conditions are recommended to control additional details of proposed Electrical Vehicle charging provisions, Construction Environmental Management Plan (CEMP) in relation to Construction Dust, and Unexpected Contamination.

Environment Agency NO COMMENT

Housing Officer – NO OBJECTION - A Section 106 agreement would be required to ensure onsite provision of Affordable Housing.

Historic Environment Service: NO OBJECTION in principle, recommended archaeological investigation conditions with the following comments:

'Although little is known about the archaeological remains in the area of the proposed development site, it does lie close to the edge of the fen, an area rich in resources and densely settled from the prehistoric to the medieval periods. There are a few finds of Prehistoric and especially Roman material in the locality. Consequently there is potential that heritage assets with archaeological interest (buried archaeological remains) will be present at the site and that their significance will be affected by the proposed development.

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Consequently, we request that the results of an archaeological evaluation are submitted in support of any planning application in accordance with National Planning Policy Framework. Ministry of Housing, Communities and Local Government (2021). para. 194. In this instance that is primarily because the development will be phased and the archaeological investigations really need to be completed for the whole development area at the same time. That would also reduce the mitigation costs for the developer.

In this case the archaeological evaluation should commence with trial trenching. A brief for this is available from Norfolk County Council Historic Environment Service. Please note that we now charge for our services. Subject to the results of this evaluation, archaeological conditions may be required.'

Note: Following re-consultation as a result of lack of archaeological investigation, the Historic Environment Service stated the following:

'Archaeological mitigation can be secured by condition, it just reduces the applicant's options if significant remains are encountered.

If planning permission is granted, we therefore ask that this be subject to a programme of archaeological mitigatory work in accordance with National Planning Policy Framework. Ministry of Housing, Communities and Local Government (2021). para. 205.'

NORFOLK FIRE & RESCUE SERVICE NO OBJECTION, the proposal should meet the necessary Building Regs requirements and a condition is recommended to ensure the provision of at least one fire hydrant.

CPRE Norfolk OBJECTION - based on the principle of development, sustainable development and the impact on the countryside

REPRESENTATIONS:

FIFTEEN letters of **OBJECTION**, the comments summarised as follows:

- No change from previous application
- Overlooking and loss of privacy as a result of position of windows
- Highway safety and impact of increasing traffic from Jenson's Way
- No need for additional houses in the village
- Access to services - schools and doctors surgeries at full capacity
- Loss of outlook and loss of agricultural fields
- Inconsistent details on existing access point compared to width shown on plan and impact on highway safety
- Impact on wildlife
- Jenson's Way is unadopted and owned by the residents, the access and roadway could therefore lead to a loss of property values
- Maintenance of Jenson's Way is currently controlled by existing occupants and future occupants would change liability
- Loss of light to houses in Jenson's Way
- Noise and disturbance (including light pollution) of houses in Jenson's Way as a result of increased use of proposed access
- Query over leisure area stated to be previously approved and not built out
- Impact of lack of main sewerage and impact of access of larger vehicles to empty septic tanks etc.

- Proximity of housing to pig farm and charcoal factory and the potential impact on these existing businesses
- Potential for future development as a result of spur road into blue land

THREE letters of **SUPPORT**, the comments summarised as follows:

- In keeping with houses in the wider vicinity
- Houses will support local businesses

LDF CORE STRATEGY POLICIES

CS01 - Spatial Strategy

CS02 - The Settlement Hierarchy

CS06 - Development in Rural Areas

CS08 - Sustainable Development

CS11 - Transport

SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PLAN 2016

DM1 – Presumption in Favour of Sustainable Development

DM2 – Development Boundaries

DM3 - Development in the Smaller Villages and Hamlets

DM9 - Community Facilities

DM15 – Environment, Design and Amenity

NATIONAL GUIDANCE

National Planning Policy Framework (NPPF)
Planning Practice Guidance (PPG)
National Design Guide 2019

PLANNING CONSIDERATIONS

The key issues in this case are:

Planning History
Principle of Development
Highway Safety and Access
Design and Impact on Form and Character
Impact on Neighbours and Residential Amenity
Affordable Housing
Other Material Considerations

Planning History

Application 21/00460/FM was refused under delegated powers in June 2021. The application proposed a similar scheme of 10 new dwellings in a similar layout on site. The reasons for refusal were as follows:

- 1 - The application site is located on the outskirts of Whittington which is categorised as a Smaller Village and Hamlet in CS02 of the Core Strategy (2011) and the entire settlement is therefore subject to countryside protection policies. By reason of the site's location, to the rear of frontage dwellings and therefore not meeting the definition of a small gap in an otherwise continuously built up frontage, the proposal fails to comply with Policy DM3 of the SADMPP (2016). No additional justification has been provided and the application therefore comprises urban encroachment into an area of land defined as countryside and would be considered contrary to Paragraph 78 of the NPPF (2019), Policies CS06 and CS08 of the Core Strategy (2011) and Policies DM2 and DM3 of the Site Allocations and Development Management Policies Plan (2016) which seek to protect areas in the open countryside from unjustified development.
- 2 - Plots 9 & 10 are positioned with side elevations facing the A134 and with acoustic fencing spanning the length of the boundary with this principal route. This lack of active frontage, combined with the visual impact of substantial fencing along a key route, is considered to be contrary to the form and character of the street scene and will have an adverse urbanising impact on the countryside which would be harmful to character and appearance of the area and is considered contrary to the NPPF (2019), Core Strategy Policies CS01, CS02, CS06 and CS08 and SADMPP Policies DM1, DM2 and DM3 which support sustainable patterns of development and protect the character of an area
- 3 - Insufficient detail has been provided to demonstrate that the site complies with the standards required by the Local Highway Authority and the site therefore cannot demonstrate a safe access or turning area for service or emergency vehicles. The application is therefore considered contrary to Paragraphs 108 & 110 of the NPPF (2019), Policies CS08 and CS11 of the Core Strategy (2011) and Policy DM15 and DM17 of the Site Allocations and Development Management Policies Plan (2016)

Principle of Development

The proposal is for the construction of 10 No. dwellings on a site in Whittington. The application site is proposed to be accessed via the B112 to the south, with the rear of the site (north) directly adjacent to the A134.

Whittington is categorised as a Smaller Village and Hamlet in the settlement hierarchy of Policy CS02 of the Core Strategy (2011) and as a result the entire settlement is considered to be within the wider countryside for the purposes of planning policy.

Policy DM3 of the Site Allocations and Development Management Policies Plan (2016) supports the construction of new dwellings in Smaller Villages and Hamlets where the development comprises the sensitive infilling of small gaps in an otherwise continuously built-up frontage, where the development is appropriate in scale and character of the group of buildings and its surroundings, and where it does not fill a gap which provides a positive contribution to the street scene.

The application site comprises part of a wider agricultural field located to the rear of a row of 5 new dwellings fronting the B1112. Whilst there is residential development further to the west of the site and an industrial unit further to the east, the application site would not be

considered to comprise either a small gap or a continuously built up frontage for the purposes of Policy DM3. The principle of residential development on site is therefore not acceptable.

In the interests of sustainability, the SADMPP and specifically Policy DM3 restricts development in Smaller Villages and Hamlets to very modest housing growth in the form of infill development discussed above. This is in the interests of sustainability and to ensure that the majority of growth in rural areas is located where it can benefit from and support rural services and facilities. In this instance, Whittington has very limited services and facilities and the proposed dwellings are therefore not considered to be in a sustainable location for the purposes of planning policy or paragraph 79 of the NPPF (2021). Whilst the Agent has put forward 'PassivHaus' principles and innovative design as additional justification for the dwellings, the development is not considered to be innovative or of exceptional quality and therefore the conflict with the Local Plan and the National Planning Policy Framework remains. The sustainability credentials of passivHaus' are not sufficient to justify the development of a greenfield site in this location which is fundamentally contrary to the Local Plan.

The applicant suggests that as the proposal site is within the parish of Northwold and Whittington, that the subject site should be considered as 'adjacent to' Northwold for the purposes of Para 79 of the NPPF (2021) in regards to the future occupants being able to make use of the facilities in Northwold. The application site, which is its own settlement as per the settlement hierarchy in CS02, is in excess of 3km from the outskirts of Northwold (A Joint KRSC) and cannot reasonably be considered adjacent to this settlement or the services it provides.

No additional justification has been provided to overcome the principle policy objections above. No information suggests that the dwellings would meet an identified local need for the purposes of para 78 of the NPPF (2019).

The Borough Council can currently demonstrate a housing land supply of 7.96 years and proposals should therefore be considered against the policies of the current local plan. The construction of 10 dwellings in this position comprises an un-sustainable form of development in the countryside which is contrary to both the NPPF (2019) and policies Cs01, Cs02, Cs06, Cs08 of the Core Strategy (2011) and Policies DM2 and DM3 of the SADMPP (2016).

Highway Safety and Access

The Local Highway Authority submitted a holding objection due to a lack of detail and concerns of the drawing of the proposed site access and layout plans.

The Local Highway Authority note that the existing access has been constructed with 10m radii, which is excessive for this scale of development and could result in vehicles entering at an unacceptable speed. Amendments are required for the proposed junction to remove existing kerbing and add give way lines to bring the proposal up to the required standard. The footway frontage also needs to be altered to allow visibility splays to be retained in perpetuity. Both the existing access point and the turning head should have an radii of 6.0m and the road extends too far from the turning head towards blue land.

The existing access road as constructed is 4.8m wide with 1.5m wide footways and existing dwellings' side elevations immediately adjacent. The proposed estate road can therefore not be widened to 5.34m as proposed and the LHA recommended that, if sufficient space is available, footways should be widened to 1.8m.

The proposed estate road also will need to be subject to a 20mph zone, the slight kink in the road alignment is unlikely to be sufficient to retain vehicle speeds at the appropriate level and will need to be tightened.

The site plan also gives limited detail with regard to the location/extent of parking areas for each dwelling and additional detail is required to illustrate parking in accordance with the required standard.

Whilst some additional information could be provided via condition, highway safety is a fundamental issue and sufficient detail is required upfront to ensure the impacts of the proposal on the wider highway network are fully considered. As it stands, insufficient information has been provided to demonstrate that the highway safety impacts of the proposal can be controlled and maintained and no additional detail has been provided to demonstrate that the site meets the required parking standards. The application therefore fails to comply with Paragraphs 110 & 111 of the NPPF (2021), Policies CS08 and CS11 of the Core Strategy (2011) and Policies DM15 and DM17 of the SADMPP (2016).

Design and Impact on Form and Character

The proposed dwellings are set around a central access road with an existing access between two dwellings to the south of the site.

The proposed dwellings are large two storey units with a mix of both 3 bedroom semi-detached pairs and detached four bedroom dwellings, each with single garages to the side of the plots. Each dwelling has soldier course detailing and a central porch projection.

The application site is on the outskirts of Whittington which has an overall rural character and comprises a range of houses of various scales and types. An existing cul-de-sac to the west of the site comprises a large group of semi-detached dwellings which are equally spaced around a central access road. The remainder of Whittington is mixed frontage development, with the majority of dwellings in the vicinity fronting main roads and with limited instances of any development in depth.

As a housing development on the outskirts of a smaller village and hamlet, the proposal site is visible on approach from the east/south east and the extent of development in depth will be apparent across fields as viewed from the A134.

In regards to the visual appearance from the A134, whilst there is residential development further to the west and to the north of the site, the existing residential development around Normans Drive is the last in a row of frontage dwellings on this side of the A134. The open character of the application site and the land either side provide a clear change in character when travelling away from the village and provide a gap between the village and the nearby industrial charcoal unit.

Plots 9 & 10 are positioned with rear elevations facing the A134. This lack of active frontage, combined with the visual impact of substantial fencing along a key route, is considered to be contrary to the form and character of the street scene, particularly due to the lack of active frontage, and will have an adverse urbanising impact on the countryside which would be harmful to the character and appearance of the area and is considered contrary to the NPPF (2019), Core Strategy Policies CS01, CS02, CS06 and CS08 and SADMPP Policies DM1, DM2 and DM3 which support sustainable patterns of development and protect the character of an area.

Impact on Neighbours and Residential Amenity

In regards to overlooking and loss of privacy, windows on the first floor side elevations of the semi-detached units serve bedrooms. The position of Plot 1 will therefore allow a viewpoint from the first-floor bedroom towards the rear elevations and private amenity space of the existing dwellings to the south of the site. Whilst this is noted, the proposed dwelling is in excess of 35m north of the rear elevation of the dwellings fronting the B1112. The proposed bedroom window is therefore considered unlikely to lead to such a significant adverse impact as to warrant refusal of the application on this basis.

Remaining bedroom windows in the side elevations of plots 2, 7 & 8 will look towards the blank gable ends of the adjoining plots and are considered unlikely to lead to any significant loss of privacy for the proposed dwellings.

However, the layout of the proposed development is considered likely to lead to adverse impacts in relation to noise and disturbance from the A134, specifically on Plots 9&10 but potentially also on the outdoor amenity space of the remaining plots.

Plots 9 & 10 are located with rear elevations and therefore rear private amenity space directly adjacent to the A134m, approximately 150m from the change in speed limit from 60 to 40mph. The distance from Plot 9 to this key strategic route measures less than 10m and the submitted noise report does not sufficiently address the potential issues. The noise report/plan submitted with this application makes no reference to any recognised guidance for the protection of amenity and sleeping spaces. Without such a report, undertaken by a suitably qualified and competent noise consultant, CSNN have objected to the application over the amenity of future occupiers – both in relation to the indoor habitable rooms and the outdoor private amenity/rear garden space. It is not considered reasonable to impose pre-commencement conditions for the submission of a further noise survey as there is no guarantee that this would lead to the impact on amenity being acceptable.

Limited mitigation measures have been put forward to control the noise and disturbance impacts of the traffic on the future occupiers of these units, with no fencing shown along site boundaries and less than 10m distance between the rear elevations of the dwellings and this principal route. Both plots have two bedroom windows at first floor and open plan Kitchen/Dining rooms facing directly towards this adjacent highway which carries significant levels of traffic and therefore has the potential to lead to adverse impacts and noise and disturbance on these habitable rooms and the outdoor private amenity space. Whilst the sound insulation and triple glazing associated with the proposed 'passive Haus' construction are noted, the siting and orientation of these units is not considered to represent a good standard of amenity for future occupiers and is considered contrary to Paragraph 130(f) of the NPPF (2021) and Policy DM15 of the SADMPP (2016).

Affordable Housing

The site area and number of dwellings proposed triggers the thresholds of the Council's affordable housing policy as per CS09 of the Council's adopted Core Strategy.

At present a 20% provision is required on sites capable of accommodating 5 or more dwellings and/or 0.165ha in Whittington. The affordable housing provision is then further split into 70% of the affordable homes being made available for rent and the other 30% for shared ownership or any other intermediate product that meets the intermediate definition within NPPF, meets an identified need in the Borough and is agreed by the Council. In this instance 2 units would be required, 1 for rent and 1 for First Homes.

The applicant has provided plans to demonstrate the onsite provision of two 3 bedroom semi-detached units. A s106 agreement would be required to ensure on site provision in accordance with Policy CS09.

Other material impacts:

With 10 dwellings proposed, the application falls below the threshold to provide public open space. DM16 states that whilst there is no definitive figure for sites of this size, proposals should contain enough space to ensure a high standard layout and amenity and integrate houses into the surrounding landscape.

The application site is within the Impact Risk Zone for Boughton Fen SSSI. Natural England have stated no comments, with the proposal unlikely to lead to significant impacts on designated sites or landscapes. No evidence has been provided to suggest that there are protected species on or around the site and the proposal is considered unlikely to lead to any significant impact on protected species.

No drainage details have been included as part of this application. It is considered that these details could be conditioned.

Specific comments or issues:

The agent notes extant consent for other residential development across Whittington in their supporting statement. The applications referred to each were considered to represent infilling of a continuously built-up frontage which, as outlined above, does not apply in this instance.

The supporting statement also notes that home working is increasingly common and therefore that the development could be sustainable despite the lack of services in the immediate vicinity. Whilst this is noted, the ability for residents to work from home is not considered to pose such significant benefits to warrant the approval of an application which is fundamentally contrary to the Borough Council's Local Plan.

An existing charcoal factory is located approximately 200m to the east of the application site and has been granted consent to extend under application ref 21/00794/FM. Consideration of the impact on neighbours took place in association as part of that decision and acoustic fencing on this nearby site will sufficiently limit any impact of this adjacent use on the properties proposed under this application.

Comments were received from the Historic Environment Service (HES) relating to the potential for archaeological remains to be present on site and a request for trial trenching was requested prior to the determination of this application. Whilst no such details have been provided, it is considered that pre-commencement conditions will suitably control the submission of additional details and the undertaking of archaeological investigations prior to the commencement of development on site. Subject to conditions, the application is therefore considered unlikely to lead to adverse impacts to heritage assets with archaeological significant and complies with Para 194 of the NPPF (2021) and Policies CS12 and dM15 of the Local Plan.

CONCLUSION

Policies CS01 and CS02 of the King's Lynn and West Norfolk Local Development Framework Core Strategy 2011 (CS) set out the overarching approach to the location of

development in the Borough. Together they seek to direct development to the most accessible locations while preventing the encroachment of development into the countryside.

Policy DM3 of the SADMPP (2016) supports the construction of new dwellings in Smaller Villages and Hamlets where the proposal meets the definition of infill development. As development in depth, to the rear of existing frontage dwellings and with open land to both the east and west, the proposal is not considered to comprise the infilling of a small gap in an otherwise continuously built-up frontage.

The principle of development on site is contrary to Policies DM2 and DM3 of the Local Plan and no justification has been provided to outweigh this conflict.

Secondly, insufficient detail has been provided to demonstrate that the site complies with the standards required by the Local Highway Authority and the site therefore cannot demonstrate a safe access or turning area for service or emergency vehicles. This is contrary to the NPPF (2019) and Policies CS08, CS11, DM15 and DM17 of the Local Plan. Whilst some detail could be controlled and provided via condition, some elements requested by the Local Highway Authority would likely result in fundamental changes to the proposal layout which could not be controlled or varied in this way. Whilst some detail could be controlled and provided via condition, some elements requested by the Local Highway Authority would likely result in fundamental changes to the proposed layout which could not be controlled or varied in this way.

Limited mitigation measures have been put forward to limit the noise and disturbance impacts of the traffic on the future occupiers of these units, with no fencing shown along site boundaries and less than 10m distance between the rear elevations of the dwellings and the A134 route. Whilst the sound insulation and triple glazing associated with the proposed 'passiveHaus' construction are noted, the siting and design of Plots 9 and 10 and the location of private amenity space is not considered to represent a good standard of amenity for future occupiers and is considered contrary to Paragraph 130(f) of the NPPF (2021) and Policy DM15 of the SADMPP (2016).

Finally, the proposal constitutes the construction of 10 no. new dwellings in the countryside. The visual impact of this development in depth, combined with the lack of screening available is considered to give rise to adverse impacts on the character of the countryside and is considered contrary to policies CS02, CS06 and CS08 of the Core Strategy (2011) and Policy DM15 of the SADMPP (2016).

The application is therefore recommended for refusal for the following reasons.

RECOMMENDATION:

REFUSE for the following reason(s):

- 1 The application site is located on the outskirts of Whittington which is categorised as a Smaller Village and Hamlet in CS02 of the Core Strategy (2011) and the entire settlement is therefore subject to countryside protection policies. By reason of the site's location, to the rear of frontage dwellings and therefore not meeting the definition of a small gap in an otherwise continuously built up frontage, the proposal fails to comply with Policy DM3 of the SADMPP (2016). No additional justification has been provided and the application therefore comprises urban encroachment into an area of land defined as countryside and would be considered contrary to Paragraph 78 of the NPPF (2019), Policies CS06 and CS08 of the Core Strategy (2011) and Policies DM2 and

DM3 of the Site Allocations and Development Management Policies Plan (2016) which seek to protect areas in the open countryside from unjustified development.

- 2 The dwellings are proposed as backland plots extending into open agricultural land to the rear of existing dwellings and Plots 9 & 10 are sited with rear elevations fronting the A134. This lack of active frontage provided to this principal route is considered to be contrary to the form and character of the street scene and the overall development is therefore considered to have an adverse urbanising impact on the countryside which would be harmful to character and appearance of the area and is considered contrary to the NPPF (2019), Core Strategy Policies CS01, CS02, CS06 and CS08 and SADMPP Policies DM1, DM2 and DM3 which support sustainable patterns of development and protect the character of an area
- 3 Insufficient detail has been provided to demonstrate that the site complies with the standards required by the Local Highway Authority and the site therefore cannot demonstrate a safe access or turning area for service or emergency vehicles. The application is therefore considered contrary to Paragraphs 108 & 110 of the NPPF (2019), Policies CS08 and CS11 of the Core Strategy (2011) and Policy DM15 and DM17 of the Site Allocations and Development Management Policies Plan (2016)
- 4 Plots 9 & 10 are sited with rear elevations fronting the A134, resulting in bedroom windows at first floor and open plan kitchen/dining room at ground floor facing towards this Principal Route. Whilst the use of triple glazing and insulation is noted, with less than 10m between the rear elevation of Plot 9 and the adjacent highway, the proposed development is considered likely to give rise to noise and disturbance impacts to future occupiers of these plots. The noise assessment submitted as part of this application is not sufficiently detailed to overcome the issues raised. The application is therefore considered contrary to Paragraph 130 of the NPPF (2021) and Policies CS08 and DM15 of the Local Plan.