

<b>ITEM:</b>		<b>RECOMMENDATION:</b>	REFUSAL
<b>REF NO:</b>	3PL/2018/1199/O	<b>CASE OFFICER</b>	Carl Griffiths
<b>LOCATION:</b>	SWAFFHAM Land at Princes Street Swaffham	<b>APPNTYPE:</b>	Outline
<b>APPLICANT:</b>	Haut Ltd c/o Agent	<b>POLICY:</b>	Out Settlemnt Bndry
<b>AGENT:</b>	Woods Hardwick Planning Ltd 15-17 Goldington Road Bedford	<b>ALLOCATION:</b>	N
<b>PROPOSAL:</b>	Erection of up to 60 dwellings with all matter reserved except access		
		<b>CONS AREA:</b>	N
		<b>LB GRADE:</b>	N
		<b>TPO:</b>	N

#### REASON FOR COMMITTEE CONSIDERATION

The application is being reported to committee as it represents a major application by virtue of the site area and the number of dwellings proposed.

#### KEY ISSUES

The key issues for consideration in the determination of the application are as follows:

- The principle of development
- Highways
- Character and appearance
- Amenity
- Trees and Ecology
- Land Contamination
- Drainage and Flood Risk
- Affordable Housing

#### DESCRIPTION OF DEVELOPMENT

Outline consent is sought for the redevelopment of the site to provide up to 60 residential dwellings with all matters reserved except access.

Submitted plans show that a new access would be created with Princes Road being redirected to give a curved turning into the site. A new priority junction would then be created to allow further access to the west on Princes Street.

Indicative layout plans show that the residential dwellings would be laid out around an internal site estate road with an area of open space to the north-west boundary of the site, a surface water attenuation area adjacent to the south west boundary of the site and a locally equipped area of play (LEAP) adjacent to the

south east boundary of the site.

#### **SITE AND LOCATION**

The application site comprises a plot of land to the south of Princes Road within Swaffham. The land consists of open grassland with some areas of foliage and tree cover located on the west, south and east boundaries.

To the east of the site is a residential development laid out in a cul-de-sac whilst to the west of the site is private allotment land which incorporates a historic water tower. To the south of the site is Swaffham Town Football Club, a bowling green and a cricket pitch.

The land is accessed from Princes Street which runs parallel to the northern boundary of the site with a number of single storey residential dwellings to the northern side of Princes Street.

The site lies outside of the settlement boundary of Swaffham and the land is designated as a playing field on the Breckland policies map.

#### **EIA REQUIRED**

N/A

#### **RELEVANT SITE HISTORY**

None

#### **POLICY CONSIDERATIONS**

The following policies of the adopted Breckland Core Strategy and Development Control Policies and the adopted Site Specific Policies and Proposals Document, including the Proposals Maps, have been taken into consideration in the determination of this application. The provisions of the National Planning Policy Framework and National Planning Policy Guidance have also been taken into account, where appropriate

CP.01	Housing
CP.04	Infrastructure
CP.05	Developer Obligations
CP.08	Natural Resources
CP.09	Pollution and Waste
CP.10	Natural Environment
CP.11	Protection and Enhancement of the Landscape
CP.14	Sustainable Rural Communities
DC.01	Protection of Amenity
DC.02	Principles of New Housing
DC.04	Affordable Housing Principles
DC.05	Affordable Housing on Exception Sites
DC.12	Trees and Landscape

DC.13	Flood Risk
DC.16	Design
DC.19	Parking Provision
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

#### **OBLIGATIONS/CIL**

If permission were to be granted, planning obligations would be sought in respect of the following and secured through a Section 106 Agreement:

- Affordable housing (24 units to be secured)
- Libraries
- Education
- Open Space

#### **CONSULTATIONS**

#### **SWAFFHAM TOWN COUNCIL**

Swaffham Town Council object to the Outline Application on the following grounds:

1. It is a designated Green Space, identified in the Breckland Local Plan, and forms part of a larger green space: it is acknowledged there is a shortage of open space in Swaffham.
2. The proposed development is outside the settlement boundary and the current housing needs will be met by the Local Plan.
3. Strong concerns were raised regarding access restraints on the network of surrounding roads leading to and from the proposed development
4. At the end of Princes St this is currently designated as a restricted by-way and the Council raise the question of the legality and ability to amend the privately maintained access road.
5. Additional development would add to the air pollution with more traffic.
6. Access is restrictive to one way traffic due to the width of the current access route
7. Potential ownership of the land at the entrance to the development site is in question.

#### **ENVIRONMENT AGENCY**

Development located above a principal aquifer and appropriate consideration should be given.

#### **ANGLIAN WATER SERVICE**

No objection subject to appropriate conditions.

#### **RAMBLERS ASSOCIATION: NORFOLK AREA**

We endorse the comments made by Norfolk County Council, expressing concern for the impact of the proposed development on Swaffham RB66, which forms an extension to Princes Road and runs on to join Shouldham Lane, which leads to a whole network of routes west of Swaffham. We are therefore very concerned that this development could make the use of this route less attractive to walkers. We also agree that, should the development get approval, we too would like to see a new Public Footpath created to link the development to the existing Swaffham Footpath 20.

#### **NATURAL ENGLAND**

No objections.

**CRIME REDUCTION & ARCHITECTURAL LIAISON OFFICER**

No objection subject to appropriate conditions.

**NORFOLK COUNTY COUNCIL HIGHWAYS**

With reference to the application relating to the above development, in relation to highways issues only, the County Council has previously advised that estate scale residential development at this location would not be considered acceptable due to the sub-standard nature of the local highway network. Princes Street, Whitsands Road and Cley Road are subject to limited carriageway width for a development of this scale and nearby road junctions likely to be used by vehicular traffic from this development have sub-standard visibility to the detriment of highway safety.

Furthermore the proposed site access shown on drawing 17388-SWAF-5-500A does not maintain an acceptable means of access to 9 Princes Street or indicate whether it is possible to connect the re-aligned carriageway to the existing kerb line in an acceptable manner, without creating an unacceptable kink in the carriageway or an unacceptable junction with King Street. As a consequence, notice is hereby given that Norfolk County Council recommends that permission be refused.

**FLOOD & WATER MANAGEMENT TEAM**

Officers have screened this application and it falls below our current threshold for providing detailed comment.

**TREE AND COUNTRYSIDE CONSULTANT**

No objection to the principal provided that all category A and B trees as identified within the supplied tree survey are retained within any layout with foundations outside identified RPA's and with sufficient space between trees and buildings for there to be no future pressure for either heavy pruning or removal. A impact assessment, tree protection plan and method statement will be required as part of a reserved matters application.

**HOUSING ENABLING OFFICER**

At present a 40% provision is required on sites capable of accommodating 5 or more dwellings and/or 0.17ha. This is then further split into 65% being made available for rent and 35% for shared ownership, shared equity or any other intermediate product that meets the intermediate definition within NPPF, meets an identified need in the District and is agreed by the Council. However, NPPF states that affordable housing should only be sought on developments of 10 or more dwellings or 0.5ha. In this instance 24 units would be required, 16 for rent and 8 for intermediate housing. I've noted the applicant has proposed 24 affordable dwellings in the application, this meets our policy.

**CONTAMINATED LAND OFFICER**

No objection subject to conditions

**ANN CHAMBERS (CLUB SECRETARY)**

We have concerns due to the fact that our green costs a great deal in time and money to keep it to the standard that it is, it is a green renowned in the county. We feel that the development could put the leisure facilities of Myres Field in jeopardy. We have a 6ft fence on our boundary but feel if the project should go ahead a gesture of goodwill would be for the developer to erect a fence such as the one round Swaffham Town Rugby Club, this would ensure the safety of our facilities and the well being of any potential invaders from harm.

**HISTORIC ENVIRONMENT SERVICE**

No objection subject to appropriate conditions.

**SPORT ENGLAND**

In accordance with Paragraph 011 of NPPG (Article 22 of the Development Management Procedure (England) Order 2015), Sport England will respond to this consultation within 21 days of the date of acceptance.

<b>AIR QUALITY OFFICER</b>	No Comments Received
<b>OBLIGATIONS OFFICER, NORFOLK COUNTY COUNCIL</b>	No Comments Received
<b>ECOLOGICAL AND BIODIVERSITY CONSULTANT</b>	No Comments Received
<b>NHS ENGLAND MIDLANDS AND EAST (EAST)</b>	No Comments Received
<b>NHS ENGLAND MIDLANDS &amp; EAST (EAST)</b>	No Comments Received

## REPRESENTATIONS

Three letters of objection have been received, their comments are summarised as follows:

- There is already allocated areas for development
- The site is contrary to the Swaffham Neighbourhood Plan.
- There are already enough parcels of land within the emerging Local Plan, to provide 900 dwellings by 2026 and it has already allocated a further 700 dwellings over the remainder of the Draft Plan period up to 2036.
- The density of housing proposed is far greater than the surrounding area of King Street and Princes Street.
- A green field site, originally a school playing field, is to be built on when there are currently other sites available.
- Access by walkers and allotment holders will be more difficult, if not dangerous.
- The development would have a profound detrimental and devastating effect on increased traffic and the environment.
- Although Princes Street is a two way road, this is on the narrow side and has been used as single file for around the last 20 years from everyone. The access to/from this road has never been the best as there are visibility restrictions turning in and out on to the feeder road (Whitsands Road) made worse this year when part of the road was take away for a new development between Princes Street and Queen Street.
- The proposal of this new development will cause extra traffic pollution, Noise level, and become a increased hazard for all pedestrian use, due to access to a supermarket opposite the aforementioned visibility restrictions.
- Considerable strain on the narrower parts of Whitsands Road with additional traffic to any emanating from Princes Street itself and the proposed development of the land at Princes Street. The submitted traffic survey fails to consider the potential for an increase in all kinds of traffic affecting Whitsands Road junctions.
- Cyclists could start to use the pedestrianised Plowright Place as a cut through, causing problems and danger for pedestrians and, if prevented from using Plowright Place, would then start to use the one way element at the town centre end of Cley Road - against the flow of traffic - to access the Market Place.
- Any person doing a "weekly" shop from Tesco or Waitrose is likely to go shopping in their vehicle to avoid carrying home heavy shopping bags.
- Cars may illegally use the one way portion of Cley Road, access to the traffic lights at the George Hotel would be much quicker. Such traffic would then proceed to Station Street, where an AQMA has already been declared by Breckland Council. Alternative routes to Tesco and Waitrose are unlikely to be used as they have their own hazards from narrowing of the roadway with parked vehicles; main road access is much the easier route.
- Traffic queues in Station Street are likely to be added to by returning site traffic, hence increasing air pollution from idling vehicle engines.

- Congestion in the Market Place from this returning traffic will increase with a potential for more accidents at the Buttercross junction.

Swaffham Town Bowls Club have also written in with the following concerns:

Our green costs a great deal in time and money to keep it to the standard that it is, it is a green renowned in the county. We feel that the development could put the leisure facilities of Myres Field in jeopardy. We have a 6ft fence on our boundary but feel if the project should go ahead a gesture of goodwill would be for the developer to erect a fence such as the one round Swaffham Town Rugby Club, this would ensure the safety of our facilities and the well being of any potential invaders from harm.

## **ASSESSMENT NOTES**

### 1.0 Principle of Development

1.1 For decision making purposes, as required by Section 38(6) of the Planning & Compulsory Purchase Act 2004, the Development Plan comprises the Adopted Core Strategy and Development Control Policies Development Plan Document, together with the Site-Specific Allocations DPD. Material considerations in respect of national planning policy are the NPPF and the recently published National Planning Policy Guidance.

1.2 The site is located outside the Settlement Boundary of Swaffham in an area of open countryside (as defined by policies SS1, DC2, CP1, and CP14 of the Core Strategy and Development Control Policies Development Plan Document 2009), where development is heavily restricted. The application is clearly contrary to these policies. Furthermore, the site is not being put forward for 100% affordable housing under the rural exceptions policy DC5. The proposal should therefore be refused unless there are material considerations that dictate otherwise. The lack of a 5-year housing supply carries weight in the consideration of the application.

1.3 Paragraphs 47 and 49 of the National Planning Policy Framework (NPPF) state that where an authority does not have an up to date five year housing land supply (at present the District figure is 3.3 years), the relevant local policies for the supply of housing as referred to above should not be considered up-to-date and that housing applications should be considered in the context of the presumption in favour of sustainable development.

1.4 The Government defines sustainable development as having three dimensions. These dimensions give rise to the need for the planning system to perform a number of roles:

- economic, in terms of building a strong economy and in particular by ensuring that sufficient land of the right type is available in the right places;
- social, by supporting, strong vibrant and healthy communities by providing the supply of housing required to meet future need in a high-quality environment with accessible local services, and;
- environmental, through the protection and enhancement of the natural, built and historic environment.

1.5 Paragraph 8 of the NPPF stresses that these roles should not be undertaken in isolation because they are mutually dependent, therefore a balanced assessment against these three dimensions is required.

1.6 In environmental terms, the site is located outside of the Swaffham settlement boundary however does adjoin the boundary to the north and east. The settlement boundary to the west of Swaffham does not comprise of a consistent north to south line and tapers to the east. Nevertheless, the site in question is

designated open space - listed as a 'playing field' on the Swaffham policies map.

1.7 Policy DC11 states that development that would result in the loss of existing sport, recreational or amenity open space will only be permitted if:

- a) it can be demonstrated (through a local assessment) that there is an excess of recreational or amenity open space in the settlement and the proposed loss will not result in a current or likely shortfall during the plan period; and
- b) recreational facilities within the open space will be enhanced by the proposed development on an appropriate portion of the open space; or
- c) the community would gain greater benefit from the developer providing a suitable alternative recreational or amenity open space in an equally accessible and convenient location.

1.8 The application has not demonstrated compliance with any of the above criteria and as such is contrary to Policy DC11. The loss of designated open space without justification or mitigation serves to demonstrate the lack of environmental sustainability of the scheme.

1.9 In terms of economic and social sustainability, Swaffham provides a good range of services for resident day-to-day needs but have limited capacity for expansion in the centre due to the constraints of heritage buildings and Conservation Areas. Swaffham suffers from congestion in the town centre, with traffic pollution a problem for pedestrians. Swaffham will provide some 1,000 houses over the plan period.

1.10 The application site itself lies on the edge of the settlement boundary of Swaffham and the key issue at hand is the accessibility of the site from a highways perspective. Whilst the site does lie on the edge of the settlement boundary, there are little or no public transport options in the immediate vicinity of the site and no walking routes to public transport options in the wider area. On this basis it is considered that future occupiers would be likely to utilise car as the most realistic transport option. As set out in detail within a subsequent section of this report, the highways authority consider that estate scale residential development at this location would not be acceptable due to the sub-standard nature of the local highway network.

1.11 In addition to the above, The Swaffham Neighbourhood Development Plan went out for referendum for adoption on 2nd May after having been found sound by the LPA and inspector and as such should be afforded weight in the assessment of the application. One of the aspirations set out within the Neighbourhood Plan is for development to be distributed to the east and west of the town rather than the north or south to ensure accessibility to the town's services. Whilst in locational terms the development of the application site would accord with this aspiration, in qualitative terms the local highway network is not of a sufficient standard to allow for safe and efficient access to these local services.

## 2.0 Highways

2.1 The application site is located directly to the south of Princes Street which is a limited width, single road which runs west from Whitsands Road to the east of the site. The layout of the surrounding road network combined with the scale of the development and likely propensity for future occupiers to utilise a car would mean that there would be a significant and demonstrable uplift in the number of vehicles using Princes Street, Whitsands Road, Cley Road and Shouldham Lane.

2.2 The highways authority have clearly outlined that all of Princes Street, Whitsands Road and Cley Road are of a substandard nature, being too narrow for two vehicles to safely pass each other at varying widths of 4 to 4.5 metres wide. Additionally the Princes Street/Whitsands Road junction, Whitsands Road/Cley Road junction and the Shouldham Lane/Lynn Road junction are all sub-standard in terms of visibility.

2.3 Whilst it is acknowledged that the local highway network is existing and is currently in use, the scale of the development would result in significantly increased usage of the network and the junctions which would have a commensurately detrimental impact on the safe and efficient operation of the highway. Furthermore, there is little or no scope for any mitigation to be provided which would alleviate the objection of the highways authority as a result of a lack of available land to facilitate such improvements.

2.4 At a technical level, the highways authority have also objected to the proposed site access shown on drawing 17388-SWAF-5-500A which does not provide an acceptable means of access to 9 Princes Street or indicate whether it is possible to connect the re-aligned carriageway to the existing kerb line in an acceptable manner, without creating an unacceptable kink in the carriageway or an unacceptable junction with King Street.

2.5 In addition to the above, it has been outlined in consultation responses that walking route Swaffham RB66 runs to the north of the site. The route forms an extension to Princes Road and runs on to join Shouldham Lane, which leads to a whole network of routes west of Swaffham. The proposed access to the site does not show any consideration of the need to retain and promote use of this route and as currently proposed could result in harm to its continued use.

2.6 In light of the above, the road network serving the site is therefore considered to be inadequate and - together with the visibility splays at local road junctions - would give rise to conditions detrimental to highway safety and contrary to the provisions of Policy CP4 of the Core Strategy and Development Control Policies Development Plan Document 2009 and Para 109 of the NPPF (2018).

### 3.0 Character and Appearance

3.1 In accordance with Policy DC16 of the Adopted Local Plan (2009), all new development should achieve the highest standards of design and in assessing any proposal the criteria laid out thereunder will be taken into account.

3.2 As an outline application, the details of layout and design remain reserved matters. However, as shown on the indicative site layout, the development would be laid out around an internal site estate road with an area of open space to the north-west boundary of the site, a surface water attenuation area adjacent to the south west boundary of the site and a locally equipped area of play (LEAP) adjacent to the south east boundary of the site.

3.3 The site adjoins residential development to the north and east, the effect of which would be to offset the visual impact of the development with views of the development from the south and west being subsumed within views of the existing built development.

3.4 In terms of density in isolation, it is considered that the density is largely appropriate to its context and an appropriate mix of dwelling size and type could be accommodated, in accordance with Policy DC2 of the Adopted Local Plan (2009). Nevertheless, the density of the scheme manifests itself in an unacceptable impact on the surrounding highway network and as such is considered excessive in this case.

### 4.0 Amenity

4.1 The indicative layout of the development shows dwellings adjoining the north and east site boundaries, directly adjacent to neighbouring residential properties on Princes Street and King Street respectively. In both cases however it is considered that the separation distance would be sufficient to ensure minimal impact on

the residential amenity of adjoining occupiers in terms of daylight, sunlight, outlook or privacy.

4.2 It is acknowledged that the activity from the presence of these new dwellings and the additional vehicular and pedestrian movements are likely to be perceptible - with reference to the existing context. However, it is not considered likely to be so intense as to be unacceptable. Again, opportunities for landscaping would also have a mitigating effect may also be addressed at the reserved matters stage.

4.3 Details of the internal configuration of the proposed new dwellings will be brought forward at the reserved matters stage. However, it is considered that adequate Gross Internal Area (GIA) can be achieved and - notwithstanding any changes to the proposed layout which may be required at the reserved matters stage - the outline proposal indicates an acceptable minimum level of private amenity space for each dwelling.

4.4 In light of the above, for the purposes of this outline application, the scheme is considered to be acceptable with regard to Policy DC1 of the Core Strategy and Development Control Policies Development Plan Document 2009.

## 5.0 Trees & Ecology

5.1 Again, the final details of landscaping are reserved however details provided at this stage indicate that all category A and B trees would be retained. The Council's Arboricultural officer consequently has no objection to the scheme subject to the retention of these trees and subject to conditions being attached if permission were granted.

5.2 In terms of ecology, mitigation measures are proposed which would reduce the likelihood of impacts on ecological receptors whilst enhancement measures would also be incorporated into the site design as set out within the ecology report. NCC Ecology team were consulted on the application and had no objections subject to relevant conditions being attached to any permission securing the mitigation and enhancement measures.

5.3 In light of the above - for the purposes of this outline application - the potential impact on trees and ecology is considered to be acceptable with regard to Policies CP6, CP10, CP11 and DC12 of the Core Strategy and Development Control Policies Development Plan Document 2009.

## 6.0 Land Contamination

6.1 As part of the submission, a Contamination Report Desk Study has been conducted (Phase 1 (P17-160pra) and Phase 2 (P17-160gi) both carried out by Haut Ltd in December 2017). The Council's Contaminated Land officer was consulted on the application and had no objection subject to relevant conditions being attached, specifically in relation to an assessment of the ground gas and volatile hydrocarbons.

6.2 The Environment Agency, whilst making no formal comment, did note that the site is located above a principal aquifer and as such, risks to controlled waters from contamination should be addressed in discharging any details.

## 7.0 Drainage & Flood Risk

7.1 As part of this submission a Drainage & Flood Risk Assessment was conducted. This confirmed that the proposed development is located in Fluvial and Tidal Flood Zone 1 - subject to very low risk of flooding from reservoirs or groundwater - though there is some risk of flooding from pluvial sources. However, development

of the site will not occupy any critical flood plain storage or cause any obstruction to the natural flow of water.

7.2 In terms of surface water, in order to drain 0.80ha of impermeable surfacing during a 1 in 100 year storm event (+25% climate change) an infiltration basin within an approximate volume of 468m is required and would be provided located towards the southern boundary.

7.3 Further, it is proposed that foul water flows from the site will discharge via gravity to the Anglian Water foul sewer network, and it has been confirmed through Anglian Water's consultation response that the network has the capacity to accommodate such discharges.

7.4 In light of the above and subject to conditions and the discharge of reserved matters - the proposal is considered to be acceptable with regard to Policies CP5, CP8 and DC13 of the Core Strategy and Development Control Policies Development Plan Document 2009.

## 8.0 Affordable Housing

8.1 At the time of the application being made, 40% provision was required on sites capable of accommodating 5 or more dwellings and/or 0.17ha. This is then further split into 65% being made available for rent and 35% for shared ownership, shared equity or any other intermediate product that meets the intermediate definition within NPPF, meets an identified need in the District and is agreed by the Council. However, NPPF states that affordable housing should only be sought on developments of 10 or more dwellings or 0.5ha.

8.2 In this instance the site meets the threshold in terms of site area and number of dwellings and 24 affordable units would be required, 16 for rent and 8 for intermediate housing, in order to be policy compliant. The applicant has proposed 24 affordable dwellings which is in accordance with the aforementioned requirements. Appropriate mechanisms to ensure the delivery of the affordable housing would be secured through a Section 106 if permission were the application to be granted.

## 9.0 Swaffham Neighbourhood Plan

9.1 The Swaffham Neighbourhood Plan was approved at the referendum stage on 2nd May and as such should be given significant weight in the planning consideration.

9.2 The Swaffham Neighbourhood Plan does not appear to allocate specific sites but relies on the allocations proposed in the Breckland emerging Local Plan. The Neighbourhood Plan places great importance on Housing and other development and the expectation that they should contribute towards improving local services and infrastructure. Also of importance is a sustainable range of housing types for a vibrant mixed community and an avoidance of further ribbon style development by concentrating development to the east and west of the town. This site lies to the west.

9.3 Whilst the Swaffham NP is a material consideration and is acknowledged, the lack of a five year supply of housing at district level engages the tilted balance in favour of sustainable development and, as the Swaffham NP does not specifically allocate housing sites the NPPF guidance is clear that the exemption to paragraph 11d is not brought in to effect:

National Planning Policy Framework (2019) Paragraph 14:

"In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to

significantly and demonstrably outweigh the benefits, provided all of the following apply:

- a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;
- c) the local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and
- d) the local planning authority's housing delivery was at least 45% of that required over the previous three years".

9.4 Therefore, the exemption against the presumption in favour of sustainable development set out in the footnote to paragraph 11 does not come into the determination and on this occasion. Relevant additional considerations include; the development should provide a mix of housing - this is an outline planning application so although the exact mix of housing is not clear at this stage, an appropriate housing mix could be provided; development should be well designed - the exact design would (in the event this outline planning application was to be approved) would be considered at reserved matters stage; traffic, air quality, flood risk - issues, have been outlined above; matters of parking, detailed design, walking and cycling would all be addressed at a later stage, if the application were acceptable. It is considered that the relevant Neighbourhood Plan policies support the recommendation with regards to this application.

9.5 The site lies close to an important feature/historical building identified by the Neighbourhood Plan. However, the site is sufficiently distanced so as not to harm its setting or significance in accordance with Policy HBE4 of the Neighbourhood Plan and Policy 16 of the NPPF.

#### 10.1 Conclusion

10.1 The site is located outside of the settlement boundary of Swaffham and would involve development of a site which is designated as a 'playing field' in the development plan. No justification has been put forward for the loss of this open space, contrary to Policy DC11, and its loss would be harmful to the open character of this part of Swaffham and would be contrary to the aims of sustainable development.

10.2 Furthermore, in respect of the anticipated highway implications, the local road network and the proposed access to the site is considered to be inadequate and would give rise to conditions detrimental to highway safety and contrary to the expectations of Policy CP4 of the Core Strategy and Development Control Policies Development Plan Document 2009 and Para 109 of the NPPF (2018).

10.3 Taking all of these matters into account, it is concluded that the adverse impacts of the proposed development would demonstrably outweigh the benefits of the scheme and consequently the proposal would not represent sustainable development, as defined in the NPPF, and would conflict with the objectives of development plan policies.

10.4 On that basis, the outline proposal is therefore recommended for REFUSAL

#### **RECOMMENDATION**

The proposal is recommended for refusal, for the following reasons.

#### **REASON(S) FOR REFUSAL**

**1 Any highway reason for refusal**

The unclassified road serving the site is considered to be inadequate to serve the development proposed, by reason of its restricted width and restricted visibility at adjacent road junctions. The proposal, if permitted, would be likely to give rise to conditions detrimental to highway safety and contrary to Policy CP4 of the Core Strategy and Development Control Policies Development Plan Document 2009 and Paragraph 109 of the NPPF (2018).

**2 Any highway reason for refusal**

The application is not supported by sufficient highways information to demonstrate that the proposed development will not be prejudicial to the satisfactory functioning of the highway and highway safety contrary to Policy CP4 of the Core Strategy and Development Control Policies Development Plan Document 2009 and Paragraph 109 of the NPPF (2018).

**3 Loss of open area**

The development of this site would result in the loss of the open space, to the detriment of the open character and visual amenities of the area and contrary to Policies CP11, DC11 and DC16 of the Core Strategy and Development Control Policies Development Plan Document 2009 and Policies 8 and 12 of the NPPF.

**4 Non-std reason for refusal**

A lack of information has been provided to demonstrated that the proposal would result in an acceptable loss of open space contrary to Policy DC11 of the Core Strategy and Development Control Policies Development Plan Document 2009 and Policy 8 of the NPPF.