

22 March 2018

GNL Regulation 18 Consultation Response

GNL0417 – Land off Beighton Road/Norwich Road, Acle

On behalf of our client, Mrs Jane Jones, we strongly recommend that Land at Beighton Road/Norwich Road should be allocated for residential development, comprising approximately 200 dwellings. The site is considered to be entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2036.

The site comprises 9.4ha, and is a large greenfield site to the south of the A47 off Beighton Road. The site was submitted as part of the Call for Sites consultation in 2016. Subsequently, the site has received a preliminary suitability assessment within the Housing and Economic Land Availability Assessment (HELAA), released as part of the Regulation 18 consultation. This preliminary assessment highlighted a number of planning constraints on site, which this representation seeks to address in order to demonstrate the deliverability of the site.

In support of this representation, a Highways Assessment has been undertaken by Orari Transport Planning to demonstrate that safe and suitable access to serve residential development at the site can be achieved.

In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', set out in footnote 11 to paragraph 47, the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable.

These points are addressed in further detail below.

Assessment of Deliverability

Suitable

Acle is identified as a Key Service Centre in the Joint Core Strategy, and in the Regulation 18 Growth Options document. Acle has four current allocations, two for residential (AC1 and ACL4), one for employment (ACL3) and one for mixed uses (ACL2) providing for a total of approximately 170 dwellings. ACL3 comprises the servicing yard for train station related uses, and adjoins the site to the north-east. It is not anticipated that development in this location would compromise residential development on site, as a landscaping buffer is envisaged around this area and to east of the site generally, to screen the development from the rail line.

The Site Proposals document, released as part of the Regulation 18 consultation, identifies that Acle is constrained to the west by the Broads, SSSIs to the south-east of the town and areas of flood risk and high-quality agricultural land to the east. Though this site lies to the east of the town, beyond the development boundary, the site would offer an opportunity for a large development that could accommodate all Acle's housing need, in a less constrained location.

The allocation of this site for approximately 200 dwellings represents a similar total allocated within the last Plan period. Should a similar figure be required in Acle for the Plan period to 2036, this site could accommodate all of Acle's housing need, thereby alleviating development pressure from more constrained areas of the Town.

As mentioned previously, the site has received a preliminary assessment of its suitability for residential development in the HELAA. The summary below addresses the planning constraints identified at Land at Beighton Road/Norwich Road:

Access: **Amber** rated. The HELAA assessment for the site highlighted concerns around the possibility of creating suitable access to the site.

To address these concerns raised in the HELAA around access, Orari Transport Planning were instructed to undertake a high-level access appraisal of the site. Their report, submitted in support of this representation, demonstrates that a suitable access to the site can be achieved.

It is envisaged that vehicular access/egress will be achieved via two roads onto Beighton Road. It is anticipated that both accesses will be able to achieve necessary visibility splays. Subject to local land ownership/access agreements, it may be possible to provide a pedestrian/cycle link to Acle Station via the neighbouring former coal yard'.

The proposed residential development will need to provide a new footway along its western Beighton Road frontage, between the southern access road and the Beighton Road /A47 junction. This footway can be accommodated on land within the control of our client.

From this, it is apparent that the site can be accessed from Beighton Road, and a footway can be provided onto Beighton Road as part of any development. More information is available within the Highways Assessment submitted to support this representation. The site should therefore receive a **Green** rating for Access.

Accessibility to Services: **Amber** rated. The site is detached from the main settlement, and lies beyond Acle's development boundary. However, it is within walking distance of Acle town centre, bus stops and the train station, and footpaths on Beighton Road can be enhanced as part of any development, using land within our client's ownership. The site's proximity to the A47 also enables excellent vehicular accessibility to the wider region. The site should therefore receive a **Green** rating for Accessibility to Services.

Utilities Capacity: **Amber** rated. The ability for utilities services to accommodate the development would be assessed in detail as part of any planning application for the site. Notably, **Utilities Infrastructure** has been **Green** rated, indicating that local infrastructure would be able to accommodate development at the site.

Contamination and Ground Stability: **Green** rated. The site is greenfield, with the exemption of the farm buildings and associated hardstanding on site, and contamination is not anticipated to form a planning constraint. Given the site's agricultural use, ground conditions are stable. The site is not level, with gentle undulations and a gradual slope from west to east. The topography of the site drops down where it adjoins Beighton Road, though it is not expected that this would preclude access onto Beighton Road.

Flood Risk: **Amber** rated. The site is situated entirely within Flood Zone 1. A small drain from the River Bure terminates to the north-east of the site, where surface water flooding is a risk. It is anticipated that this can be incorporated into the design of any development, with appropriate landscaping and open space provision.

From this, it is apparent that the site is at low risk from flooding, so it should receive a **Green** rating for Flood Risk.

Market Attractiveness: **Green** rated. The site is within a desirable location with good transport links.

Significant Landscapes and Townscapes: **Amber** rated. The site is not situated within a Special Landscape Area, or other landscape designation. However, development at the site would result in a

noticeable departure from the predominantly rural character of the surrounding area. The HELAA notes that development at the site may impact upon long views from The Broads. Any development proposals for the site would be informed by an appropriate Landscape Character Assessment to ascertain how the site should be designed to positively influence the character of the area. The site should therefore receive a **Green** rating for Significant Landscapes/Townscapes.

Biodiversity and Geodiversity: **Green** rated. The site is in active agricultural use, and is not of high ecological value. The western frontage of the site onto Beighton Road is populated by a number of established trees. These trees may be removed as part of enhancements to Beighton Road and the addition of footpaths to facilitate any development. The health and ecological value of these trees will be assessed in detail as part of any planning application, with trees retained where possible together with an appropriate landscaping strategy.

Historic Environment: **Green** rated. The site is not within the vicinity of any listed structures or monuments.

Open Space and GI: **Green** rated. The development of the site would not result in the loss of any open space. Development at the site would seek to deliver public open space alongside residential development.

Transport and Roads: **Amber** rated. As discussed, the development of the site would require the provision of a footway along Beighton Road, which can be provided as part of any development. Should it be deemed that Beighton Road requires widening to facilitate the development, this can be accommodated within our client's land ownership.

Furthermore, we recommend that the 30mph limit on Beighton Road, which currently extends to the length of the existing built form along Beighton Road, should be extended to the junction of Jolly's Lane as part of any development.

From this, it is apparent that the transport network around the site would require upgrading to facilitate the development. These upgrades can be delivered as part of any development, on land within our client's ownership. The site should therefore receive a **Green** rating for Transport and Roads.

Compatibility with Neighbouring Uses: **Amber** rated. The site adjoins residential development to the west, the A47 to the north, agricultural land to the south and the trainline runs parallel to the east of the site, with associated loading areas adjoining the north-east of the site.

Residential development of the site would be well related to uses to the west, and it is envisaged that development would be concentrated to the south-west of the site, thereby maintaining an open space/landscaped buffer between the drain to the north of the site and the trainline to the east.

Additionally, the site is wholly within Grade 1 Agricultural Land. While the loss of this land would be unavoidable, the site can accommodate a considerable portion of Acle's housing growth in the Plan period to 2036. This would safeguard the other large areas of Grade 1 land to the east of the town.

From this Assessment of Deliverability, and highways evidence, it has been demonstrated that there are no constraints on site, aside from the loss of Grade 1 Agricultural Land, that cannot be addressed through appropriate mitigation.

Available

The site is within the ownership of Mrs Jane Jones, who has instructed Bidwells to submit this representation on her behalf. The site is not restricted by any leases or restrictive covenants. Therefore, the site is therefore available for development.

Achievable

To achieve large-scale residential development at the site, enhancements to the local transport network would be included as part of any development proposals. This can be included as part of any planning application for the site.

Safe and suitable access to the site can be achieved, thereby addressing a key constraint raised with the site's HELAA assessment.

Viable

Development of the site for residential purposes is considered viable, taking into consideration the various policy requirements in relation to matters such as affordable housing provision and CIL contributions. Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary at the appropriate time in the planning process.

Summary

As outlined above, the site is suitable, available, achievable and viable, and is therefore deliverable. It is recognised that enhancements to the local transport network would be required to facilitate development, and this could be delivered as part of any proposals.

As discussed, development at this location would result in the loss of Grade 1 Agricultural Land. However, the allocation of this site could satisfy Acle's entire housing need in the Plan period to 2036. Furthermore, safe and suitable access to the site from Beighton Road can be achieved.

On this basis, the site should be taken forward as an allocation for residential development in the emerging Local Plan, and would represent sustainable development.

I trust the above is of assistance in your consideration of selecting particular sites. Should you have any questions at this stage, please do not hesitate to contact me.

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NORWICH ROAD

6m

Drains

Drain

A47

STATION RD

Sta

Station

Hillside Farm

Beighton Road Farm

Area: 9.408ha (23.25ac)

Drain

7m

16m

BEIGHTON ROAD

BEIGHTON RD

HILLCREST

Track

Mast

Coal Yard

JOLLY'S LANE

The Cowsheds

Hill Farm

Track

REEDHAM ROAD

7m

Drain

Scale: 1:5,000 @ A4 OS Ref: TG 3910 Drawing No: A.49,880d Date: 09/02/2018

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0 40 80 160 240 320 400 Metres

BIDWELLS

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Drain

