

22 March 2018

GNLN Regulation 18 Consultation Response

GNL1022 – Land North of Hillcrest

On behalf of our client, Mrs Jane Jones, we strongly recommend that Land at Hillcrest, Acle should be allocated for residential development, comprising up to 60 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 lies to the north of Hillcrest, Acle and comprises 2.9ha. 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.

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 a logical extension to the adjoining built form at Hillcrest, in a less constrained area 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 North of Hillcrest:

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.

In summary, Hillcrest will need to be improved to meet Norfolk County Council standards i.e. 4.8m width carriageway and at least one 1.8m width footway, which can be delivered as part of any development. Furthermore, visibility splays of 2.4m x 43m may be achieved at a widened Hillcrest/Beighton Road junction, as part of any development.

From this, it is apparent that the site can be accessed from Hillcrest, following some local road widening and junction enhancements, which can be provided as part of any development proposals. The site should therefore receive a **Green** rating for access.

Accessibility to Services: **Green** rated. While the site is situated outside of the town centre, it is well served by footpaths and cycle access into Acle and the wider rural hinterland. The site's proximity to the A47 also enables excellent vehicular accessibility to the wider region, while the train station and bus services are within walking distance of the site, with safe access via the local footpath network.

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, and contamination is not anticipated to form a planning constraint. Similarly, ground conditions are stable. The site is not level, with an incline towards the north of the site. However, it is anticipated that development would be concentrated to the south of the site, maintaining a buffer zone between the site and the A47.

Flood Risk: **Green** rated. The site is situated within Flood Zone 1, and surface water flooding is not anticipated at the site. Any planning application for the site would be informed by an appropriate flood risk assessment.

Market Attractiveness: **Amber** rated. It is recognised that the site is detached from the main town, though accessibility to services and the wider region is good. The housing mix proposed on the site would be subject to local demand.

Another factor which may influence the market attractiveness of the site is noise from the adjoining A47. It is anticipated that the site would contain a generous acoustic buffer area to the north of the site to screen the development from any noise impacts, assisted by the existing tree belt. It was not considered necessary to conduct detailed noise assessments to support the representation for the site at this stage of the planning process, as any noise studies completed now would become obsolete by the time the Plan is adopted. It is anticipated that noise impacts can be addressed through appropriate mitigation.

From this, it is apparent that the site can deliver a desirable residential development, following more detailed design specifications. The site should therefore receive a **Green** rating for Market Attractiveness.

Significant Landscapes, Townscapes: **Amber** rated. The site is not situated within a Special Landscape Area, or other landscape designation. The site should therefore receive a **Green** rating for Significant Landscapes/Townscapes.

Biodiversity and Geodiversity: **Green** rated. The site comprises farmland, with low ecological value.

Historic Environment: **Green** rated. The site is not situated 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, while any development would provide open space as required. This would complement the play area adjacent to the play area south of Hillcrest.

Transport and Roads: **Amber** rated. As discussed, Hillcrest and the junction with Beighton Road will require enhancements to deliver a suitable local transport network. The HELAA assessment ascertains

that residential development at the site may encourage unsustainable transport modes. However, the site is well connected to Acle Station and the wider Town via footpaths. The enhancements to Hillcrest that are necessary to facilitate development would extend the footpath network further, offering a safe pedestrian route into Acle and the Station.

While enhancements to Hillcrest will be required to facilitate development on site, this can be delivered as part of any development proposals. Moreover, the temporary closure of the Hillcrest/Beighton Road junction would not enclose existing dwellings on Hillcrest, as vehicular access is available from Hillcrest to Beighton Road through the existing estate development. The site should therefore receive a **Green** rating for Transport and Roads.

Compatibility with Neighbouring Uses: **Amber** rated. The site would comprise residential development, thereby remaining in keeping with the surrounding area. The site could include open space provision, offering a new open area which complements the play area to the south with new community uses.

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 mitigation.

From this, it is apparent that there are no planning constraints that would render the site unsuitable for residential development.

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 available for development.

To the west of the site, there is a small strip of land owned by Circle Housing which separates Land at Hillcrest from Beighton Road. This strip of land may be required to facilitate the junction improvements to the Hillcrest/Beighton Road junction. Efforts have been made to contact Circle Housing. It is not anticipated that this minor landholding would preclude development on site.

Achievable

The Greater Norwich Local Plan Regulation 18 Consultation document identifies, in the analysis of the six growth options, that the allocation of small/medium size sites for residential development is paramount to securing housing delivery in the Plan period to 2036:

The size of allocations will also be a key consideration. Whilst larger sites can provide new services and facilities, recent experience has shown that they are more difficult to get off the ground. Smaller sites are often more likely to deliver and can support the vitality of existing settlements.

Land at Hillcrest comprises a smaller site, which can be delivered quickly to achieve appropriate and proportionate growth in terms of Acle's local context.

Furthermore, based on the suitability assessment above, it is demonstrated that there are no site-specific constraints which could threaten the delivery of residential development on the site. Enhancements to the immediate road network will be required, though these can be included within development proposals. Therefore, residential development on the site, of the scale proposed, is deemed to be entirely achievable.

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. 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.

It is recognised that Hillcrest is currently not suitable to accommodate further growth. However, the enhancements to Hillcrest and the Hillcrest/Beighton Road junction that would be required to facilitate the development can be provided as part of any development.

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.

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Land at Hillcrest, Acle

