



March 2020

# GNLP Site Submission

Borderland Farm (GNLP0007),  
Damgate Lane,  
Acle,  
NR13 3DJ

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# Information

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Site Address	Borderland Farm, Damgate Lane, Acle, NR13 3DJ
Date	March 2020
Local Planning Authority	Broadland District Council

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**Reviewed By:** Jason Parker (Director)

**Report Revision:**1

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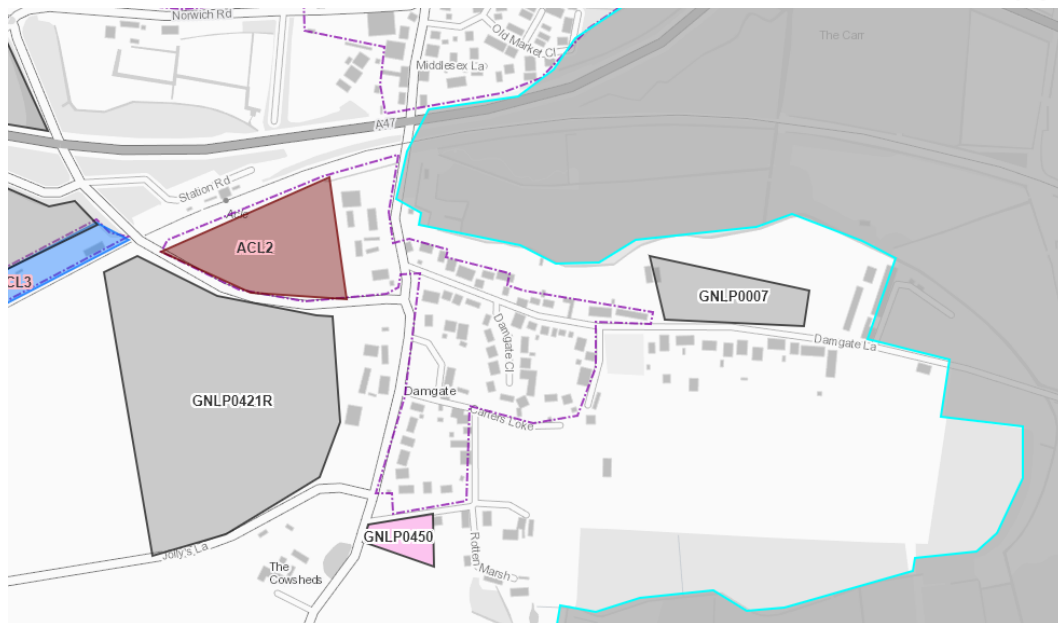
*Appendix B - Extract HELAA December 2017*

## 1.0 Introduction

- 1.1 The Greater Norwich Local Plan (GNLP) is being produced by **Broadland District Council**, (hereafter BDC), Norwich City Council and South Norfolk District Council working together with Norfolk County Council through the Greater Norwich Development Partnership (GNDP).
- 1.2 The GNLP will cover the period to 2038 and will identify sites for new homes, jobs and infrastructure. As well as welcoming the submission of new sites for potential allocation in their Local Plan as part of the GNLP Regulation 18 'Preferred Options' stage consultation, the consultation document also identifies those site that it currently 'prefers' for allocation in addition to those 'known' sites that they currently consider 'unreasonable' for allocation.
- 1.3 **We note the identification of their site (GNLP0007) as an 'unreasonable option' for meeting the emerging housing requirement within the settlement of Acle at this stage in the emerging Local Plan's preparation.**
- 1.4 The intention of this statement is to affirm the suitability, availability and achievability of the site GNLP0007 for inclusion within the GNLP and the evidence base documents the that will inform its preparation. The consultation itself commenced on 29th January 2020 and will close on the 16th March 2020.
- 1.5 Parker Planning consider that the site would make a valuable contribute to housing land supply as part of a more logical, coherent and crucially sustainable settlement expansion scheme that would assist in meeting GNLP's growth aspirations for Acle the plan period to 2038.
- 1.6 This statement has been prepared in order to satisfy the requirements of the joint Norfolk Housing and Economic Land Availability Assessment Methodology (HELAA, 2016) in addition to the requirements of the consultation response form issued as part of the current Regulation 18 stage consultation.

## 2.0 Site and Context

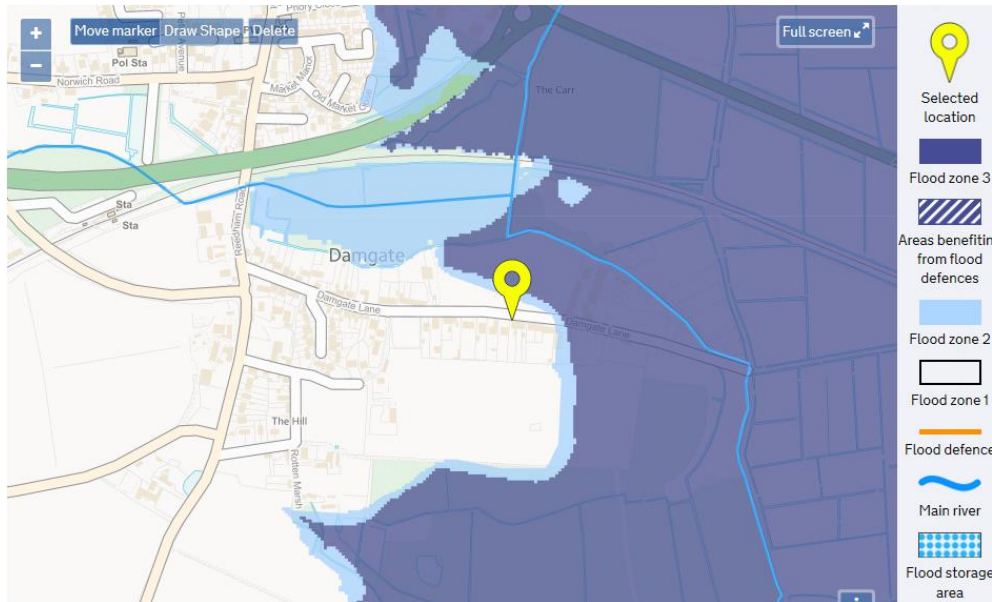
- 2.1 The site comprises a garage (to be retained) and uncultivated grassland lying adjacent to and north of Damgate Lane.
- 2.2 The site has an area of 2.7ha and has the potential to accommodate approximately 5 dwellings as a minor housing scheme.



*Fig.1 Plan illustrating the position of part of our site (GNLP0007) as it appears on the GNLP Reg. 18 Consultation Interactive Map.*

### **3.0 Designations & Constraints**

- 3.1 Acle is identified as a Key Service Centre in the Greater Norwich Local Plan and as such a relatively sustainable location for development with a host of services and facilities available for current and future residents and very good access to sustainable transport modes.
- 3.2 Parts of the sites lie within Flood Zones 2/3. However, there is sufficient land within Flood Zone 1 to accommodate a smaller development of 5 dwellings approximately.



*Fig 2. Map identifying land within Flood Zones 2/3. There is land within Zone 1 that could potentially accommodate a smaller scheme of 5 dwellings approx.*

- 3.3 The site lies in an area designated as ‘countryside’ (i.e. outside of any defined settlement boundary) where new development would normally be more restricted (Policy GC2, BDC Development Management Policies DPD, 2015). However, we are seeking the inclusion of this site within the development boundary as an allocation within the context of the Council’s emerging GNLP, so this ‘constraint’ is not particularly pertinent.
- 3.4 There are no archaeological records pertaining to the site. Acle does not have a Conservation Area and there are no historic buildings in close proximity of the site.
- 3.5 Acle has a Neighbourhood Plan that was made on 17<sup>th</sup> February 2015.

#### **4.0 Suitability including assessment of potential ‘constraints’ & ‘impacts’**

- 4.1 As indicated above, Acle has been established as a Key Service Centre on the basis of its level of ‘Core’ and ‘Secondary’ service provision. The settlement is therefore considered to be a relatively sustainable location for new development.
- 4.2 The settlement of Acle is also well related to higher order settlements including the City of Norwich which lies just 7 miles to the west, where there a full range of services and facilities

available for current and future residents of Acle. Acle is extremely well served by several bus services including 15 (Acle - Norwich), 71A (Wroxham – Acle), 72A (Thurne - Acle) 73A (Acle – Acle), 73C (Acle - Great Yarmouth), 491 (London – Great Yarmouth), X1 (Norwich – Lowestoft), X11 (Norwich – Belton).

- 4.3 To assess the suitability of sites the HELAA methodology document (intended to accord with both local and national planning policy and guidance) prescribes a **red**, **amber**, **green** (RAG) approach to assessing various types of ‘constraints’ on a site’s deliverability in addition to potential ‘impacts’ arising.
- 4.4 For a site to be ‘taken forward’ and included in the HELAA capacity assessment, sites are expected to achieve either an amber or green rating against all suitability criteria and furthermore, meet the availability and achievability ‘tests’. Some sites will have constraints and impacts that are insurmountable and thus undermine their suitability for development.
- 4.5 Following the RAG assessment prescribed in the methodology, the LPA concluded within the context of the *HELAA December 2017* document (relevant extract to be found at appendix B):

*There are a number of constraints affecting this site but these may be possible to mitigate. The site is concluded as **suitable** for the land availability assessment.*

- 4.6 Furthermore, the current Consultation Draft GNLP identifies:

*This site is not considered to be suitable for allocation as almost half the site is in flood zones 2 or 3 which would significantly affect the developable area, meaning that the site would be unlikely to meet the minimum requirement for allocation of 12-15 dwellings. There is no safe walking route to the local primary school, the site is in close proximity to the sewage works, the Broads and Damgate Wood County Wildlife Site.*

- 4.7 It is for this reasons that the site now appears as a ‘unreasonable Option’ within the context of the consultation draft GNLP. For the reasons outlined below, Parker Planning consider the site suitable (‘reasonable’) for inclusion within the HELAA and GNLP. To affirm this site as a reasonable option, we have undertaken our own RAG assessment, intended to accord with the combined Authority methodology (2016).

### **Potential Site Constraints**

- 4.8 Access to site – The access to the site will be taken from Damgate Lane. As identified in the

HELAA (2017 – Appendix B) initial highway advice indicates that any access constraints *could be overcome by development*. **RAG assessment = Green.**

- 4.9 Access to Local Services and facilities - The site relates particularly well to the settlement and its centre including all the facilities and amenities found therein and as outlined in this statement. **RAG assessment = Green.**
- 4.10 Utilities Capacity – Although predominantly ‘greenfield’, the site relates well to the existing form of Acle. There is no evidence to suggest that utilities capacity would be an obstacle to development. **RAG assessment = Green.**
- 4.11 Utilities infrastructure – Although predominantly ‘greenfield’, the site relates well to the existing form of Acle. There is no evidence to suggest that utilities infrastructure will be an obstacle to development. **RAG assessment = Green.**
- 4.12 Contamination – This is a predominantly ‘greenfield site’. There are no known contamination or ground stability issues pertaining to the site. **RAG assessment = Green.**
- 4.13 Flood Risk – Parts of the site lie within Flood Zones 2/3 and an appropriate Flood Risk Assessment (FRA) and drainage strategy will be provided in due course. There is sufficient land within the confines of the site lying within Flood Zone 1 that could realise a development of 5 dwellings. **RAG assessment = Amber.**
- 4.14 Coastal Change – This site is located some distance from the coast and is not associated with any Coastal Hazard Zone(s) or similar. **RAG assessment = Green.**
- 4.15 Market Attractiveness – This is an extremely popular place to live with a demonstrable need for both market and affordable homes. The site lies within CIL Charging Zone B which itself would suggest that development in this location must be viable. **RAG assessment = Green.**

### **Potential Site Impacts**

- 4.16 Landscape/townscape – Any development would be sympathetic to existing development in the locality and consequently there is unlikely to be a detrimental impact on the townscape. The site does not lie within an area subject of any landscape designation as defined/identified in the Development Management Policies DPD Policies Map (2015). **RAG assessment = Green.**



- 4.17 Biodiversity and geodiversity – An arboricultural assessment will be required (on submission of any planning application) to establish (among other) the value of trees on the site boundaries. **RAG assessment = Green.**
- 4.18 Historic environment - There are no archaeological records pertaining to the site according to the Norfolk Heritage Explorer, albeit the LPA are likely to insist on a scheme of investigation, were the site to be allocated. There are no listed buildings in close proximity of the site. **RAG assessment = Green.**
- 4.19 Open Space – The site is not the subject of any ‘open space’ designation(s). Appropriate and accessible open space will be provided in accordance with local planning policy and guidance in due course and subject to successful inclusion within the context of the Local Plan as an allocation. **RAG assessment = Green.**
- 4.20 Transport and Roads – There is no evidence to suggest that the development will have an unacceptable impact on the local highways network although engagement with the local highway authority will be ongoing through to allocation/planning application. **RAG assessment = Green.**
- 4.21 Compatibility with neighbouring uses – The proposed development will be entirely compatible with the neighbouring land uses to the south and west. This is a predominantly residential area of the settlement. There is a sewerage works lying to the east of the site and an Odour Assessment will be provided alongside any application in due course. **RAG assessment = Green.**
- 4.22 The above ‘suitability’ criteria are just one element of the assessment for the HELAA. In addition to establishing whether sites are potentially suitable for development, sites are also assessed in terms of whether they are ‘available’ for development and whether they are ‘achievable’.

## **5.0 Assessment of Availability**

- 5.1 A site will normally be considered available by the Council if it is in the ownership of a developer or landowner who has expressed an intention to develop or sell land for development. This site is under the control of landowners who are actively promoting the site for development within the emerging GNLP process.

## **6.0 Assessment of Achievability (including viability)**

- 6.1 A site will be considered achievable within the context of the HELAA where there is a reasonable prospect that development will occur on the site at a point in time. A key determinant of this will be economic viability of the site. This will be influenced by the market attractiveness of a site, its location in respect of property markets and any abnormal constraints on the site. It is considered that development on this site is viable, being in an area with considerable demand for both market and affordable dwellings. Furthermore, there are no abnormal constraints pertaining to the site (i.e. 'reds' in the context of the RAG assessment – see section 4 above).

## **7.0 Summary**

- 7.1 It is trusted that this report has affirmed, in line with both national and local planning considerations, that our site (north of Damgate Lane – GNLP0007) is available, achievable and suitable for inclusion within the context of the next HELAA capacity assessment and as a future allocation within the context of their emerging GNLP.
- 7.2 Parker Planning consider that the site would make a valuable contribute to housing land supply as part of a more logical, coherent and crucially sustainable settlement expansion scheme that would assist in meeting GNLP's growth aspirations for Acle and the sub-region as a whole in the plan period to 2038.

## Appendix A – Site Assessment Proforma

<b>Site Address:</b> GMLP0007, Damgate Lane, Acle	
<b>Current Planning Status</b>	'Unreasonable' site emerging GMLP (GMLP0007)
<b>Site Size (Ha.)</b>	2.7
<b>Greenfield/PDL</b>	Predominantly Greenfield (garage to be retained)
<b>Ownership</b>	3 x Landowners
<b>Absolute Constraints Check</b>	
<b>SPA, SAC, SSSI or Ramsar</b>	N/A
<b>National Nature Reserve</b>	N/A
<b>Ancient Woodland</b>	N/A
<b>Flood Risk Zone</b>	Site partially within Flood Zones 2/3
<b>Scheduled Ancient Monument</b>	N/A
<b>Statutory Allotments</b>	N/A
<b>Locally Designated Green Space</b>	N/A
<b>At risk from Coastal Erosion</b>	N/A
<b>Development Potential (No. units):</b> 5 homes approximately	

<b>Density Calculator</b>		
<b>Suitability Assessment</b>		
<b>Constraint</b>	<b>Score (RAG)</b>	<b>Comments</b>
<b>Access</b>	Green	See Above
<b>Accessibility</b>	Green	See Above
<b>Utilities Capacity</b>	Green	See Above
<b>Utilities Infrastructure</b>	Green	See Above
<b>Contamination/Stability</b>	Green	See Above
<b>Flood Risk</b>	Amber	See Above
<b>Coastal Change</b>	Green	See Above
<b>Market Attractiveness</b>	Green	See Above
<b>Impact</b>	<b>Score (RAG)</b>	<b>Comments</b>
<b>Landscapes</b>	Green	See Above
<b>Townscape</b>	Green	See Above
<b>Biodiversity/Geodiversity</b>	Green	See Above

<b>Historic Environment</b>	Green	See Above
<b>Open Space</b>	Green	See Above
<b>Transport &amp; Roads</b>	Green	See Above
<b>Compatibility</b>	Green	See Above
<b>Local Plan Designations</b>		
<b>Designation</b>	<b>Policy Reference</b>	<b>Comments</b>
Emerging GNNP 'unreasonable' site	GNNP0007	The landowners support the allocation of site GNNP0007
<b>Availability</b>		
<b>Is the site being marketed?</b>	Yes	
<b>When might the site be available?</b>	Immediately	
<b>Estimated annual build-out rate</b>	Site can be delivered in year 1	
<b>Achievability (including viability)</b>	See above	
<b>Overcoming Constraints</b>	See above	
<b>Trajectory of development</b>	Within year 1	
<b>Barriers to delivery</b>	None	

<b>Theoretical Capacity</b>	5 Approximately
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## Appendix B – Extract HELAA, December 2017

Acle Suitability Assessment	
Site reference	<b>GNLP0007</b>
Site Area	1.07 hectares
<b>LOCATION</b>	<b>PROPOSED DEVELOPMENT</b>
Borderland Farm 51 Damgate Lane Acle Norwich Norfolk NR13 3DJ	Residential development of up to 12 dwellings.
District	<b>Broadland</b>
<b>CONSTRAINTS ANALYSIS</b>	
Access	Amber
Accessibility to Services	Green
Utilities Capacity	Green
Utilities Infrastructure	Green
Contamination and Ground Stability	Amber
Flood Risk	Amber
Market Attractiveness	Green
<b>IMPACTS ANALYSIS</b>	
Significant Landscapes	Amber
Townscapes	Amber
Biodiversity and Geodiversity	Amber
Historic Environment	Green
Open Space and GI	Green
Transport and Roads	Amber
Compatibility with Neighbouring Uses	Amber
<b>SITE SUITABILITY CONCLUSIONS</b>	
<p>This is a greenfield site off Damgate Lane south of the A47. Although it is adjacent to Damgate it is not well related to services. Initial highway evidence has indicated that there are potential access constraints on the site, but these could be overcome through development. The local road network is considered to be unsuitable either in terms of road capacity, or lack of footpath provision. Other constraints include close proximity to the Broads, potential impacts to SAC, SSSI and Ramsar Site, areas at medium to high risk of flooding, proximity to county wildlife site at Damgate Wood, potential impact on ecology and odour from sewage works to the east of the site. There are a number of constraints affecting this site but these may be possible to mitigate. The site is concluded as suitable for the land availability assessment.</p>	
<p><b>For the purposes of the HELAA capacity assessment this site is considered to be <b>SUITABLE</b></b></p>	

Acle		
Availability and Achievability Assessment		
<b>Availability and Achievability Conclusions</b>		
The proposer has indicated that the site is likely to be AVAILABLE in the following timescale:	Immediately	(timescales have not been specified by the proposer if these fields left blank)
The proposer has indicated that the site is likely to be DEVELOPABLE in the following timescale:	Immediately	
In terms of site viability, this site has been submitted by a landowner/promoter as viable for the form of development proposed and is assumed to be developable within the plan period in accordance with the timescales above (where given). Further area-wide work on viability typologies will be done as plan-making progresses and will inform decisions on viability.		
Overall Conclusions for Site GNLP0007		
Based on the site suitability analysis it is considered that this site is appropriate for the land availability assessment, subject to any caveats in the Suitability Conclusions.		