

16 March 2020  
Reps to Reg 18 GNLP - GNLP0384 Acle



Greater Norwich Local Plan Team

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Dear Sirs,

## REPRESENTATIONS TO GREATER NORWICH LOCAL PLAN

### STAGE C REGULATION 18 DRAFT STRATEGY AND SITE ALLOCATIONS

#### GNLP0384 – LAND NORTH OF SOUTH WALSHAM ROAD, ACLE

Savills (UK) Ltd are instructed on behalf of the Diocese of Norwich to submit representations in support of the site identified as 'GNLP0384' within the emerging Greater Norwich Local Plan (GNLP). GNLP0384 was first submitted through the GNLP call for sites exercise in July 2016.

This covering letter comprises our representations to the current consultation.

We have reviewed the assessment of the site provided within the emerging GNLP Sites Document, and make the following comments in relation to the site's delivery. We have further reviewed Acle's sustainability and its ability to accommodate increased levels of growth.

Acle is within the administrative boundary of Broadland District Council.

#### Comments on GNLP0384 – Land North of South Walsham Road, Acle

Below, the site is considered against the tests within the NPPG<sup>1</sup>, confirming that the site is suitable, available and achievable for development purposes.

##### Suitable

###### *Accessibility to Services*

Encouraging growth in sustainable settlements within rural areas is in accordance with 2019 NPPF and is considered vital to the long term sustainability of rural communities (NPPF para 78).

Acle is identified as a 'key service centre' in the GNLP Strategy Document. Key service centres are identified by the GNLP at paragraph 333 as having '*a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas*'. Acle has services and facilities including a secondary school, a primary school, a small range of shops and library. These are within easy walking/cycling distance of the site.

<sup>1</sup> Paragraph: 019 Reference ID: 3-019-20140306; Paragraph: 020 Reference ID: 3-020-20140306; and Paragraph: 021 Reference ID: 3-021-20140306



Acle is also well connected to Norwich and Great Yarmouth by bus and rail links, where there are a number of facilities and services, including leisure and employment. There are six bus services serving Acle including the 491, 71A, 72A, 73C, X1, and X11 which provide a regular bus services to surrounding settlements including Norwich. Acle train station provides a train links to Norwich and Great Yarmouth.

#### *Transport and Roads, and Landscapes*

In describing GNLP0384, the GNLP Sites Document states:

*“This site is not considered to be suitable for allocation on highway and landscape grounds. Development would require a 2m wide footway at the north east side of South Walsham Road and insufficient highway is available to provide this.”*

Neither of these primary constraints are considered matters that could not be overcome through further design or technical work. However it is recognised that GNLP0384’s separation from the built up part of Acle may be more of a constraint. Therefore our client would welcome this site being considered as a single allocation alongside the adjacent site GNLP1049.

Access would be sought via South Walsham Road. South Walsham Road, which is a primary route into the town, appears to have sufficient width at this point to accommodate development of the site. If required there is sufficient land available within the site and highway boundary to allow this section of road to be widened. It is acknowledged that the provision of a suitable footpath to the site may be restricted, however if considered alongside GNLP1049, this matter could be addressed through the public right of way ‘Acle FP1’ which connects to Pyebush Lane and Orchard Close to the east, which in turn provides safe pedestrian access into the town. In considering the site alongside GNLP1049, this would have the added benefit of providing vehicular access to GNLP1049.

Equally, if considered in isolation, pedestrian access to the site could be provided through draft allocation GNLP2139 to the south of South Walsham Road which is proposed to connect to Mill Lane. As part of the development of GNLP0384 and GNLP2139, it may be possible to provide a pedestrian crossing on South Walsham Road.

With respect to landscape impact, it is noted that the site is open to the north and north-west, however subject to the implementation of an appropriate landscaping scheme, this alone would not necessarily preclude a sensitively designed development coming forward through a new Local Plan allocation. Equally when considered alongside draft allocation GNLP2139, the dynamic of the site changes significantly, as a result of the impact this would have on the settlement’s built form. In this context the site would not appear out of character or visually any more prominent. An allocation alongside GNLP1049 would further emphasise this fact.

#### *Other Comments*

There are limited other physical limitations or constraints on the site which would make development of the site difficult or unacceptable. The site is not located within Flood Zones 2 and 3 and is not subject to any PROW which may affect development of the site.

#### Available

The site is considered available for development being within the control of a single owner. Should the site be accepted as an allocation for residential development in isolation, Savills would be able to act on our client’s behalf with a view to identifying a suitable development partner as soon as possible. Should the site be accepted as an allocation alongside GNLP1049, our client would look forward to working alongside the neighbouring land owner with view to realising a single scheme across the two sites. Discussions between the

two parties would commence at the earliest opportunity should this potential allocation be favourable to the Council.

### Achievable

As noted above, there are no known major technical constraints relating to the site and therefore it is considered its development would be economically viable. Services including electricity, mains water, foul sewerage and telecommunications are available.

There are no other known factors that mean development of the site would be difficult or unachievable. Therefore, it is clear that this site presents a deliverable option for housing and could make a material contribution to the housing targets of the district.

### **Comments on Acle's Suitability for Growth**

Whilst our client supports the GNLP growth strategy, they would like to highlight the benefits of bringing forward further allocations in the town of Acle. It is considered that providing additional sites, and therefore increased housing numbers within Acle presents a more viable and achievable approach to growth. This would be particularly important should those allocations proposed at present be delayed or fail to be deliverable in the early years of the plan. Through providing a greater choice of sites, it would ensure the local plan has flexibility with its allocations, ensuring that there would be sufficient land allocated in the town to meet growth targets.

As set out above, Acle is identified as a 'key service centre' with a good range of services and facilities including a secondary school, a primary school, a small range of shops, library and bus/rail links to Norwich and Great Yarmouth. Increased levels of residential growth in the town of Acle would contribute towards the growth and preservation of these services, helping to support and enhance the vitality of the community and contributing to the local economy in line with Paragraph 78 of the NPPF, which promotes the sustainability of rural communities.

Furthermore, additional local income and employment would be created for both individuals and businesses involved in the construction elements of any development. It is also considered that any construction workers and local trades will make use of local services and facilities during the construction period. In the long-term it is likely trades people will be required to help maintain any properties.

Equally further allocations would mean a greater proportion of affordable housing coming forward helping to address affordable housing needs. It would also further contribute to the District's housing supply.

### **Acle Neighbourhood Plan**

It is acknowledged that Acle Neighbourhood Plan was 'made' in February 2015 and would form part of the Development Plan for the site.

### **Conclusions**

It is considered that land north of South Walsham Road (GNLP0384) is sustainable and deliverable as defined by the NPPF, and a suitable location for residential development. The site, within the ownership of the Diocese of Norwich, represents an attractive option for housing growth within the District.

Whilst our client supports the GNLP growth strategy, our client believes there would be significant benefits in bringing forward further allocations in the town of Acle.

I would be grateful if you could keep me updated in relation to the next stage of the Local Plan process and, reserve the right to appear at the Examination sessions, if required, when they take place.

Please do not hesitate to contact me should you require any further information.



Yours faithfully,

Gareth Watts MRTPI  
Planner