

Proposed Residential Development on Land off Jolly's Lane, Acle

Submission of Representations relating to Regulation 18 Consultation, Greater Norwich Local Plan

on behalf of CROCUS HOMES

Ref: 19/195

GNDP Site ref: GNLPO421R

REPRESENTATIONS TO REGULATION 18 CONSULTATION ON THE GREATER NORWICH LOCAL PLAN MARCH 2020

Greater Norwich Local Plan: Land off Jolly's Lane, Acle (Ref: GNLP0421R)

Introduction

1. The following comments are submitted in support of the suggested allocation on the land off Jolly's Lane (ref GNLP0421R).
2. Representations for this site were submitted to previous Reg 18 Consultation for the Draft Local Plan in March 2018.
3. The current Reg 18 consultation identifies the site as 'unreasonable' in the Draft Local Plan. The plan states that the *'site is not considered to be suitable for allocation as it is located to the south of the A47 and the rail tracks and is therefore not particularly well related to services and facilities or the character of the town. In addition, there is no safe walking route to the local primary school'*.
4. The following statement sets out the suitability of the site for housing and the benefits the development of the site would bring.

Comments in Draft Local Plan

5. The Local Plan seeks to meet the growth needs in Greater Norwich from 2018 to 2038. Acle is identified in the Plan as a 'Key Service Centre'. The proposed settlement hierarchy envisages that 8 % of the proposed housing growth (or around 3,417 homes) would be provided in such settlements.
6. It is considered that the proposed site is in a highly sustainable location, is suitable housing and is well related to the settlement of Acle. Furthermore, the development would make a positive contribution to the supply of housing in the area consistent with both local and national policies.
7. Notwithstanding the initial HELAA assessment, it is considered that the site is well related to the existing settlement. Indeed, it is noted that planning permission has been given on land close to this proposal, which is only marginally closer to A47 and subject to similar issues of proximity to services and likely pollution, noise from traffic & lack of footways along Leffins Lane. Furthermore, the HELAA Addendum incorrectly states the distance of the proposed site to the village centre as 1,200 metres, when the actual distance is around 700m.

Competing Sites

8. It is considered that the proposed site would perform at least, if not better, than other competing sites. With regards to site GNLP2139 at land off South Walsham Road, it scores lower on the HELAA comparison table in comparison to the proposed site at Jolly's Lane, with amber ratings given to site access, access to services, utilities capacity, flood risk, biodiversity & geodiversity. In comparison to the proposed site, the lack of highway provision to deal with increased traffic could lead to a congested streetscape. Evidently, a Highways consultation comment in the HELAA stated that improvements to the road network would be unfeasible:

"No. Would require carriageway widening to 5.5m & f/w at South Walsham Rd frontage. Not enough highway to deliver footway & also significant tree on route, construction unlikely to be feasible. Mill Lane highly constrained at junction with The Street, no vehicular access feasible, pedestrian & cycle improvements may be required. Possible opportunity to provide alternative/emergency access for Mill Lane".

9. At the Jolly's Lane site, there is already ample road capacity to deal with an increase in car movements. Furthermore, the suggestion that the site is not well related to services in the town does not bear closer scrutiny. Both sites GNLP2139 and GNLP0378 are of a similar distance from key services compared to the Jolly's Lane site, albeit with the exception of Acle High School. The size of the proposed site (reduced from initial representation down to around 30 units) will mitigate the initial concerns raised and allow for the sustainable development to the south of the town.

Current Proposals

Layout

10. The layout submitted shows a scheme of around 30 units, which represents a reduction in the number of units originally submitted to the last consultation (from 150 to 30).



Figure 1- Indicative site layout

11. The design intent for the proposal is to place-shape a natural extension to the village of Acle, referencing recently approved residential development to the north of Leffins Lane. The proposal of 30 homes, comprises of a mixture of detached, semi-detached, terraced and bungalow housing typologies, offering a wide-ranging housing offer to meet local housing need, whilst ensuring appropriate 'place-living' characteristics of Acle. Each home is designed to have high levels of private amenity and off-street private parking in the form of a garage or driveway.

12. To ensure the proposal is 'stitched' with the existing / recently approved fabric of Acle, careful consideration has been made to routes within the setting to safeguard desire lines of new residents to key local attributes in the form of the town centre and Acle station. Consideration has also been made to ensure that a natural extension to this proposal could seamlessly come forward to either the west or south, whilst being served by the proposed access point.

Highway Access

13. It is proposed that the primary access to the development would be provided via a new entrance onto Leffins Lane, which adjoins the northern boundary of the site. This access would be constructed in accordance with relevant highway standards. A secondary or emergency could be provided off Jolly's Lane, if required, together with associated improvements to the lane itself.

14. As there are currently no pedestrian facilities on Leffins Lane, a new footway is proposed on the southern side of the road, extending from Reedham Road to Station Road. Improvements to pedestrian facilities at the junction of Leffins Lane and Reedham Road are also proposed to provide safe links to existing footways and the town centre. To support increased pedestrian movement, it is proposed that the speed limit for this section be reduced to 40mph. Additional bus stops and shelters could also be provided in suitable locations close to the site. Subject to these improvements, it is considered that safe and convenient pedestrian links would be available from the site to the town centre and local facilities.

Benefits/Impact

Access to services

15. Acle is identified in the Draft Local Plan as a Key Service Centre. It benefits from a range of local facilities, including primary and secondary schools, a small supermarket, local shops, post office, medical practice, veterinary surgery, library, church, public house, social club and playing fields. These facilities are capable of meeting many of the day-to-day needs of residents. Several businesses provide local employment opportunities. The adjacent site ACL3 is proposed for employment end use, which is expected to result in ample employment opportunities for the area. A wider range of higher order services, employment and leisure facilities are available in Norwich, Great Yarmouth and Lowestoft.

16. Although the site proposed for development is separated from the town centre by the A47 trunk road and main railway line, Reedham Road, which passes under both, would provide direct and convenient links to local facilities for future residents. The A47 trunk road would not represent a physical obstacle to pedestrian/cycling movements between the site and local facilities.

17. Reedham road is constructed to good standard and benefits from streetlighting. Footways extend on its eastern side northwards to the town centre. By this route, the town centre is approximately 700 metres from the proposed development site, and so would be readily accessible either on foot or by bicycle.



Figure 2- Distance of proposed site from key services (source: Google Maps)

18. It is acknowledged that existing footways would need to be extended up to the proposed development site, but this could be readily be secured through the normal planning process, as sufficient land is available within the site and the adjacent highway to enable this improvement. Subject to the extension of existing footways, safe walking routes would be available (both schools were walked to from the site to validate the legitimacy of these claims). Measured from the proposed site entrance, both Acle Primary School (1.15km) and Acle Academy (0.9km) would be within the maximum recommended walking distance of 2 miles (if below age of 8 years old) and 3 miles between 8 & 16 years old (Home to school travel & transport guidance, Department for Education, July 2014).

19. Several bus services operate through Acle providing frequent and regular connections to Norwich, Great Yarmouth and Lowestoft (First Connect services X1, X11 and 15). There are several bus stops in the vicinity of the site, including on Beighton Road, Leffins Way, Norwich Road and The Street, all of which are within a 15-minute walk. In addition, regular train services are available to Norwich and Greater Yarmouth from Acle Station, which is around a short walk from the site, either via Leffins Lane or Reedham Road. Unlike many small settlements in Norfolk, a range of sustainable transport options would be available to future residents.

20. Consequently, it is considered that the proposed development would be benefit from good access to local services, and would accord with local and national planning policies which indicate that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

21. It is acknowledged due to the site's rural location; residents of the proposed development, like existing residents, would be reliant to a degree on car travel for large shopping and leisure trips.

Several sustainable transport options would nonetheless be available for local services, including walking, cycling and public transport. In these terms the development would be consistent with national planning policy, which seeks to direct development to locations where a range of sustainable transport options are available, whilst acknowledging that opportunities to maximise sustainable transport options will vary from urban to rural areas.

Local Character

22. The site proposed for development falls within Landscape Character Area F2: Marsh Fringe-South Walsham to Reedham, as defined in Broadland's Landscape Character Assessment. Landscape planning guidelines for this area include conserving its diverse landscape character and mosaic of arable fields, pasture and woodland, ensuring that development responds well to settlement patterns and integrates into the landscape, and maintaining the landscape setting of market towns.

23. The land at Jolly's Lane comprises an area of undeveloped agricultural land on the southwestern edge of Acle. Its development for residential purposes would extend the built form of the town into the countryside and would result in some loss of openness. However, the site is well contained visually by development to the east and by established hedgerows on all other sides. Furthermore, due to the screening effects of the local topography and existing vegetation, views of the site are generally confined to the immediate vicinity of the site.

24. Approaching from the north, some views across the northern half of the site would be available from Leffins Lane, but from here the proposed development would be set against a backdrop of trees and hedges, and would be seen in the context of the built up edge of the town and nearby major transport infrastructure. It is noted also that planning permission has been granted for housing and employment on the opposite side of New Reedham Road (LPA ref. 20141392 and 20180941).

25. Approaching from the south, Jolly's Lane has a more rural aspect, but development would again be seen set against a backdrop of existing trees/hedges. To maintain an appropriate soft edge to the town, it is anticipated that development would be set well back from the road behind generous landscaped open spaces. Existing hedgerows would also be supplemented by additional new planting where necessary to further mitigate the visual effects of development.

26. Consequently, it is considered that whilst the proposal would inevitably result in some loss of rural character (in common with other greenfield sites on the edge of the settlement), its impact on the landscape setting of the town and the character of the area generally would be limited and localised, and could be satisfactorily mitigated by sensitive new landscaping and layout proposals. The proposal would not conflict in principle therefore with the Council's landscape guidelines.

27. Acle has a generally compact and nucleated form, with the majority of development being located to the north of the A47. However, the built footprint of the town also extends to the south of the A47, with areas of well-established housing along Reedham Road and to the east off Damgate Lane. Additionally, as noted above, land to the south of Acle Station has been granted permission for housing and employment development. The proposed development would consolidate this established pattern of development, whilst maintaining the generally compact form of the town. Although detailed proposals have not yet been drawn up, it is proposed that the form and density of the development would be consistent with existing and proposed housing nearby.

Biodiversity/Ecology

28. There are several protected sites in the locality, including the Broads SAC, Broadland Ramsar site and Broadland SPA. These sites are located around 360 metres away to the east and are separated from land at Jolly's Lane by intervening off Reedham Road. Aside from existing boundary hedges and trees (which can be retained), the site proposed for development is of low ecological value, comprising two arable fields and lacking any other features of note. Due to the lack of scarce or specialist resources within the site, it is likely that any wildlife present will be part of larger local populations. The provision of new landscaped open spaces as part of the development would offer the opportunity to enhance biodiversity. Further detailed ecological assessment of the implications of the proposal will be undertaken and provided in due course.

Utilities Infrastructure

29. We do not believe there is any fundamental impediment to the delivery of the site through any constraints relating to utilities infrastructure. The increase in capacity can be built into the new development.

Flooding

30. The site proposed for development falls within Flood Zone 1 and so is at low risk of fluvial flooding. Small pockets of the site have been identified as being at risk of surface water flooding. However, it is considered that this flood risk could be managed satisfactorily as part of the overall surface water strategy for the development, which would be based on sustainable urban drainage principles. No risks of flooding from other sources, including sewerage systems and groundwater, have been identified. Reported flooding at underpass on Reedham will be mitigated if possible.

Delivery of Development

31. In relation to local infrastructure, it is noted that upgrades may be required to the sewerage system and to increase capacity to wastewater recycling centre. However, at this stage no other significant infrastructure constraints have been identified which would be likely to prevent the development of the site for housing. Nonetheless, an infrastructure study has been commissioned in order to identify any infrastructure improvements needed to facilitate the proposed development. This information will be forwarded as soon as it is available. The site is in a single ownership and no further land is needed to enable the land to be brought forward for development. The land is currently available for development and, subject to approval being given, could deliver housing in the short term.

32. It is noted that land to the north, east and south of the town is generally constrained by significant flood risk, landscape and ecological considerations, whilst some locations to the west are affected by traffic noise from the A47. The land off Jolly's Lane is not impacted directly by these constraints, although it is acknowledged that the site comprises higher quality agricultural land, like many other sites on the outskirts of the town.

Summary

33. The proposed development would make a positive contribution to the supply of housing in the area. The proposal would also add to the range of housing sites available in the locality, providing flexibility and a wider choice of development opportunities to the market, thus strengthening the local supply of housing land. New residents would add to the vitality of the local community. Given their accessibility, existing local businesses and services would be likely to derive support from the development due to the addition to the local economy of the spending power of new residents. The construction of the development would also provide some economic benefits, albeit temporary. In

these respects, the proposal would support the social and economic dimensions of sustainability as defined in the NPPF.

34. Furthermore, it is considered that the Acle would represent a sustainable location for development of the scale envisaged, given the range of local services available and its good public transport links to larger centres nearby. The development would also be consistent with a number of the potential growth options identified in the Draft Local Plan, including development along transport corridors, dispersal, dispersal plus new settlement and dispersal plus urban growth. By providing sufficient land of the right type in the right place to support growth the development would address the economic and environmental dimensions of sustainable development, as defined in the NPPF.