

6 March 2023

Delivered by email

Planning Policy
South Norfolk House
Cygnet Court
Long Stratton
Norwich
NR15 2XE

Ref: SILC3015

Dear Sir / Madam

**SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATION PLAN - REGULATION 19 CONSULTATION
REFERENCE – VCASL1, LAND OFF CHURCH ROAD, ASLACTON**

This representation to the South Norfolk Village Clusters Housing Allocation Plan (VCHAP) Regulation 19 Consultation has been written for Silverley Properties Ltd. The representation principally relates to their land interest, proposed allocated site VCASL1 in Aslcaton. The Site has been promoted to date through the course of the Plan preparation, and this letter provides further support for the inclusion of the site as an allocation within the Plan.

Policy

Silverley Properties supports the proposed allocation site VCASL1 and considers this to be sound in accordance with paragraph 35 of the National Planning Policy Framework 2021 (hereby referred to as the 'NPPF'). The inclusion of the Site is considered to have been positively prepared and clearly justified.

Silverley Properties provided representations to the previous Regulation 18 consultation and made the case that the Site could provide a greater number of dwellings than that being proposed. The Council were asked to consider extending the draft emerging allocation on the basis that it would enable a future scheme to come forward which provided generous landscaped buffers, with meaningful areas of open space along with the opportunity to contribute towards much needed community facilities for this Village Cluster.

As a result of this, further discussions have been undertaken with the Council and a presentation made to the local community on 30 March 2022 to seek and engage their views. It is therefore a positive change that the Council have extended the area of the draft allocation and proposed a greater number of dwellings in this location. In line with the tests of soundness, this is also deemed effective in providing housing alongside additional amenities for the local community, thereby directing growth in accordance with paragraph 79 of the NPPF which encourages 'to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities'.

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While the precise design of the Site would be determined at the planning application stage, it is considered that the Site can accommodate the level of development proposed through the allocation, taking into consideration provision of a mix of housing size and tenure, private garden space, parking facilities and open space. The design would draw upon the positive characteristics of the area to form a high quality and attractive scheme that would be an asset to the village and provide a high-quality development in which to reside.

An illustrative layout is appended to this letter to demonstrate this and how the Site could be developed to meet the requirements of the allocation.

Suitability

Previous representations were made to the Regulation 18 Consultation and are appended to this submission, although at that time they were based on a smaller area. However, since then the Council have extended the draft allocation and undertaken a revised site assessment in December 2022. This assessment updated the HELAA Score given in relation to possible constraints, such that none are now Red. The Council, in rating the Site with either an Amber or Green score, clearly consider this to be a suitable site for allocation.

It is not the intention to repeat what has already been submitted to the previous consultation, however Silverley Properties considered it important to respond and address those outstanding criteria scored Amber. Further work has been undertaken and the proposed approach to matters relating to highways, utilities, landscape, biodiversity and heritage in the context of the wider allocation are set out below.

Highways and Access

PSP Consulting on behalf of Silverley Properties have obtained up to date Highway Boundary Records from Norfolk County Council Highways and, as shown on the enclosed Bidwells drawings, a safe and suitable access to the site from Church Road, in accordance with full NCC Highway Design Standards can be provided. The NCC Highway Boundary Records show that the Site abuts the Highway Boundary along the whole Church Road frontage and the Muir Lane frontage; this allows Silverley Properties to deliver carriageway widening of Church Road to 5.5m width along the site frontage, including a new 2 metre wide footway linking to the bus stops on Muir Lane.

The NCC Highway Boundary Records show that once the Off-site Highway Works Section 278 scheme for Cooper's Yard (20/0493) has been agreed with NCC Highways and implemented, the proposed development will be able to deliver the widening of Church Road and the 2m footway along the site frontage of the draft allocated site.

The relatively long site frontage to Church Road, allows the Silverley scheme to include a car parking facility for the primary school and local church, with appropriate and safe access and egress to Church Road. As shown on the Bidwells drawings, the scheme can also provide a frontage village green. The car parking and the village green would be laid out to ensure that the public right of way along the western boundary of the site is protected and enhanced.

Utilities Capacity

Initial enquiries indicate that utility services for the proposed site can be provided from supplies within the local area. Having reviewed the route of the water supply main which is present on the Site against the illustrative development layout which accompanies this submission, it is unlikely to impact on the layout and could be incorporated into the proposed development utility services layout or diverted during the course of the development.

Prior to finalising the design of the Site, a 'Developer Enquiry' will be made to Anglian Water for a more detailed view on the infrastructure required to serve the development. A Utilities & Wastewater Assessment report will be produced which will provide further information on utility services and wastewater drainage provision, which will enable the outline application to be finalised..

The foul water drainage strategy will be part of the outline planning application submissions, and this strategy will include the necessary on-site provision and any off-site infrastructure improvements.

Landscape/Townscape

The previous representations to the Regulation 18 included a landscape assessment by Greenlight Environmental Consultancy Limited to assess in more detail the current visibility of the Site and propose mitigation measures that would seek to minimise the visual impact of the development. The results of that assessment concluded that the greatest effect on visual amenity was likely to be experienced immediately adjacent to the site only. With more distant views of the proposed development beyond this being limited and if experienced, would be in the context of the existing settlement edge. It was therefore considered that there was little potential for the development to result in any significant effects on visual receptors beyond the immediate site boundaries.

The wider allocation results in a greater area of open space and landscaping within the Site with more opportunities to the North and East for additional tree and hedgerow planting, as well as the creation of a buffer to the public right of way along the western boundary.

Despite the Amber score for the Site, it is acknowledged in the commentary that the potential visual impact of the development could be 'reasonably mitigated'. The illustrative layout plan demonstrates how this can be achieved. Any future planning application would include a landscaping scheme which would ensure that the level of residential development proposed could be successfully accommodated within the Site and surrounding landscape without any adverse impact on the landscape character or visual amenity.

Biodiversity/Geodiversity

The existing Site comprises an agricultural field surrounded by trees and hedges to the East and an existing hedgerow along the western boundary. The wider allocation offers the opportunity to retain much of the existing vegetation on site, i.e. the boundary planting, where biodiversity value is highest. Development is therefore limited to the open cultivated land where the biodiversity value is lowest. As referred to in the previous section, the level of landscaping and planting will be of a greater scale and this means not only can the existing habitats at the boundaries of the Site be reinforced and enhanced but new habitats can be created within the development scheme. This will provide opportunities to strengthen the biodiversity of the Site further and provide a biodiversity net gain.

Historic Environment

The previous representations to the Regulation 18 included a review of the Site by Turley Heritage, which concluded that the Site could be delivered in such a manner as to ensure that it would not give rise to harm to the nearby heritage assets of the Grade II listed Church Farmhouse.

The revised site assessment with an Amber score acknowledges that the development of the Cooper Scrap Yard impacts upon the setting of Church Farmhouse and that the development of this Site would not result in any additional adverse impact. Reference is made to the consideration of re-establishing the hedgerow on the Muir Lane/Church Lane corner. The Illustrative layout plan which accompanies this letter demonstrates that through the wider allocation, the eastern edge of the site can retain the existing trees and hedgerow while introducing further planting which will extend around the corner of Muir Lane and Church Lane and continue along the frontage to Church Lane.

As such, the Site can be delivered in such a manner that it would not give rise to any harm to the nearby heritage assets or the townscape of Aslacton.

Availability

We can confirm that Silverley Properties Limited have entered into a partnership with the landowner and therefore the Site continues to be 'available' as defined by the National Planning Policy Framework.

Achievability/Viability

The absence of any known site constraints along with the landowner/developer partnership indicates that there is a 'good prospect' of the land coming forward for development within the Plan period in line with the NPPF. Further, this submission is accompanied by a letter from Brown & Co which confirms that the Site is a viable prospect and can be successfully developed in accordance with the draft allocation.

Summary

Silverley Properties considers that the South Norfolk Village Clusters Housing Allocation Plan Regulation 19 Document is sound in accordance with paragraph 35 of the NPPF.

As has been set out in previous representations for the site, development would be deliverable and developable in accordance with the requirements of the NPPF. The site is available now and would provide a medium sized development that could be built out relatively quickly and early on in the Plan period.

The following benefits would result from the development of the site:

- Provides housing in a location which relates well to the existing village of Aslcaton;
- Provides a mix of both market and affordable housing to meet local needs;
- Introduces car parking for both the primary school and church use;
- Provides public open space for both new and existing residents;
- Includes the potential for a community building if locally required;
- Supports the viability of the local Primary School;
- Provides economic benefits:
 - short term whilst the site would be under construction
 - long term with support for local services and facilities increasing the customer base in the settlement area; and
- Offers opportunities for comprehensive landscaping and biodiversity enhancement and provision.

As part of their assessment of the site the Council have not identified any constraints that cannot be overcome and consider that the site would provide an appropriate housing development within a suitable. The proposed allocation of the site is therefore supported and should be taken forward as part of the VCHAP Submission.

Yours sincerely



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Enclosures:

Appendix 1: Illustrative Layout

Appendix 2: Viability Letter from Brown & Co

