
Breckland Local Plan Examination

Local Plan Examination
Hearing Statement – Matter 14

On behalf of
Abel Homes Ltd



Contents

1.	Introduction	1
2.	Matter 14 - Strategic urban extensions, housing site allocations and settlement boundaries	2

1. Introduction

1.1. This Hearing Statement has been prepared by Savills (UK) Ltd on behalf of Abel Homes Ltd.

1.2. Abel Homes is a family run, local housebuilder based in Watton, Norfolk. The award winning company is known for its high quality homes. Abel Homes has built homes across Breckland and is committed to the continued delivery of new homes at their sites at Swaffham and Watton.

1.3. In respect of the Breckland Local Plan 2011-2036, Abel Homes controls:

- Swaffham Allocation 3 - Land to the East of Brandon Road, Swaffham (LP[097]009)
- Watton Housing Allocation 2 – Land North of Norwich Road, Watton (LP[104]015)

1.4. Abel Homes has actively participated in the preparation of the Local Plan for Breckland for a number of years. Consistently, the development proposals for development at Swaffham and Watton have been favourably considered in assessments of how best to accommodate the future development needs at the District.

1.6. Savills will attend the Hearing sessions on Matter 14 to expand on the representations made to the Regulation 19 consultation and the content of this Statement.

2. Matter 14 - Strategic urban extensions, housing site allocations and settlement boundaries

2.1. With regard to this matter, Savills will reference the representations submitted to the Regulation 19 consultation. In addition, Savills make the following comments:

Swaffham

2.2. Abel Homes Ltd supports the 'Swaffham Allocation 3 - Land to the East of Brandon Road' (LP[097]009).

2.3. This site benefits from Breckland Planning Committee resolution to grant outline permission for up to 175 dwellings including affordable housing and open space with detailed means of access (LPA Ref: 3PL/2016/0068/O) subject to S106 and Conditions.

2.4. The application was first reported to committee in June 2016 and subsequently in August 2017 following detailed consideration of the viability position. Abel Homes is committed to the delivery of these new homes which includes 26.3% affordable dwellings.

2.5. Abel Homes is working with Breckland Council and Norfolk County Council to progress the S106. It is anticipated that this S106 will be finalised and the decision notice issued prior the date of this hearing session.

Question 14.23: Are the allocations justified, consistent with national policy and deliverable, insofar, that the HRA cannot rule out likely significant effects on the Brecks SPA?"

2.6. In respect of 'Swaffham Allocation 3' the impact of the proposed development upon the Breckland SPA has been considered as part of the application determination (LPA Ref: 3PL/2016/0068/O). On behalf of the Council, a Memo was issued to the Breckland Case Officer from Captia's Ecologist dated 23rd February 2016. It stated that:

- Development at the site is "...shielded from the SPA by these other two developments. Therefore direct impacts in terms of visual disturbance to SPA features, if present on land within 2km of the proposed development, are not considered likely."
- "In terms of impacts relating to additional recreational impacts to the SPA, the report details that the closest parts of Breckland SPA to this site are privately owned and there are no public rights of way to the SPA from

the proposed development site. Therefore there wouldn't be an issue with the new residents disturbing these areas, causing disturbance to SPA bird features or damaging the SSSI designated habitats."

- *"Therefore, in considering the above factors we conclude that the development is not likely to have a significant effect on the integrity of the SPA and no Appropriate Assessment is required."*
- *"Natural England's advice has been received and they confirm that they are satisfied that as long as the development is carried out in accordance with the details of the application as submitted, they do not consider the development will not result in any likely significant effects will result on the SPA nor the SSSI features."*

2.7. It is therefore concluded that 'Swaffham Allocation 3' is justified and consistent with national policy in so far as it is not anticipated to result in any likely significant effects on the SPA or SSSI features. The site benefits from a resolution to grant outline planning permission subject to S106 and conditions. A Construction Ecological Mitigation Plan and a Habitat Management Plan are to be secured for the site via condition.

Question 14.24: "To be effective, should the criteria of Swaffham Allocation 3 refer to the need to have regard to the findings of the Historic Characterisation Study, as set out in the supporting text (3.163)?"

2.8. The Historic Characterisation Study (2017) identifies that there are no designated heritage assets in proximity to the site (page 191). In addition it is confirmed the allocation will have no impact upon designated assets or non-designated heritage assets.

2.9. The Historic Characterisation Study also refers to this site as a 'gateway' to the town from the south. It recommends that:

- *"Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this particular instance, respecting the site's location on the edge of the settlement, the site being a prominent gateway into the village and the respecting the landscape character sensitivity will be additional factors in the formation of proposals." (page 192).*

2.10. Policy 'Swaffham Allocation 3' criteria 4 already makes reference to the site as a 'key gateway into Swaffham' and criteria 2 and 3 highlight the importance of landscape retention and new planting at the site.

- *"4. The layout and design of the site will provide an appropriate response to the established pattern of development along Norwich Road and respect the site's location as a key gateway into Swaffham;"*
- *"2. Retention and enhancement of perimeter hedgerows and trees";*
- *"3. Provision of adequate planting and landscaping on the eastern boundary";*

2.11. Abel Homes does not raise objection to the addition to specific reference to the 'Historic Characterisation Study' within the policy wording if the Council and or Inspector is minded to include this.

Watton

Question 14.29: “The two site allocations total 205 dwellings, however, Policy HOU 02 identifies a need for 175 dwellings. What is the justification for allocating more dwellings than required by Policy HOU 02?”

2.12. Policy HOU 01 identifies that the ‘development requirements’ across the plan period 2011 to 2035 as a minimum of 15,298 new dwellings.

2.13. It is noted that Policy HOU 02 identifies a housing target of 175 new dwellings at Watton but has decided to allocate land capable to accommodate 205 dwellings. It is considered that Watton is a sustainable Market Town location which can accommodate additional development.

2.14. Abel Homes preferred site for allocation at Watton is ‘Land North of Norwich Road, Watton’. It makes provision for residential development comprising of market dwellings, affordable housing, and care home.

Question 14.30: “Are the allocations justified, consistent with national policy and deliverable, insofar, that the HRA cannot rule out likely significant effects on the Brecks SPA?”

2.15. The Watton allocations are discussed at page 80 of the Footprint Ecology ‘Breckland Local Plan Habitats Regulations Assessment at Publication Stage. It is stated as a result of a lack of survey data that there is the potential to ‘likely significant effects’ and therefore a project level Habitat Regulations Assessment is required to accompany any application submission. Abel Homes has informed the Council within the consultation response to the Regulation Local Plan Consultation that it is happy to commission necessary ecological data at the appropriate time. No such request for data has been received to date.

Question 14.31: “Are criteria 1, 2 and 8 set out in Watton Housing Allocation 2 justified?”

2.16. Yes - Criteria 1 seeks the provision of vehicular access via Norwich Road. This criteria is considered to be justified given that access could be taken via Watton Green from the north of the site. Norwich Road is considered to be a more appropriate option to provide the new access.

2.17. No - Criteria 2 seeks the implementation of transport mitigation measures to the satisfaction of Norfolk County Council Highways Authority. As highlighted within the representations in response to the Regulation 19 Consultation it is requested that the wording is altered to: “*Implementation of necessary transport mitigation measures to the satisfaction of Norfolk County Council Highways.*”

2.18. No – Criteria 8 is not justified. As detailed within the representations in response to the Regulation 19 Consultation it is requested that the wording for criteria 8 is removed. There should not be a requirement for the applicant to pay for a pre-application enquiry with the statutory undertaker to identify capacity in the network to accommodate development in a planned manner. In addition, the statutory undertaker will be consulted as part of the application determination process to identify the up to date position.

Question 14.32: “Is criterion 9 of Watton Housing Allocation 2 consistent with national policy?”

2.19. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states in the consideration of planning applications which affect a listed building or its setting, the determining authority shall have “*special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*”.

2.20. The National Planning Policy Framework sets out at paragraph 131 that in determining planning applications, local planning authorities should take account of:

- *“the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness.”*

2.21. The National Planning Policy Framework identifies to the correct balancing exercise for the determination of applications at paragraph 133 and 134.

2.22. It is acknowledged that a planning application at this site would need to be accompanied by a Built Heritage Statement to assess the anticipated impact of the proposals upon local heritage assets, including Rokeles Hall.

2.23. The Breckland ‘Historic Characterisation Study’ states in respect of this site (LP[104]015) at page 221 that “*There is a substantial conifer tree belt, which limits views to the north east. To the east and north mature native trees provide more natural screening. The site appears enclosed and somewhat isolated due to the substation height and density of the conifers.*”

2.24. Page 222 recommends that “*Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken to inform an appropriate design response. In this particular instance, enhancing screening to north east of site to protect Rokeles Hall will be an additional factor in the formation of proposals.*”

2.25. Criteria 9 requires development proposals to “*protect and enhance the setting of the Grade II Listed Building Rokeles Hall*”. The Council’s evidence suggests that enhanced landscape screening within the allocation site will be an appropriate design solution “*to protect Rokeles Hall*” from the impact of the proposed development. In so far as enhancement of the setting of Rokeles Hall is limited to additional landscaping, criteria 9 is accepted by Abel Homes.

