

Bungay Neighbourhood Development Plan

Potential site allocations for residential
development

Assessment proforma

June 2019

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Introduction and executive summary

The Waveney Local Plan sets out that, *“the strategy for Bungay allows for a modest level of growth which protects the sensitive landscape around the town which is well related to the Broads. New employment land has already been permitted to the south of the town as part of a mixed use development which will help improve the self-containment of the town. The Local Plan allocates land for 485 new homes (of which 150 already have planning permission) in addition to the 72 on unallocated sites which already have permission or completed since the beginning of the plan period. New housing will help contribute funding towards the delivery of a new fit for purpose community centre for the town as well as support the shops and services of the town centre.”*

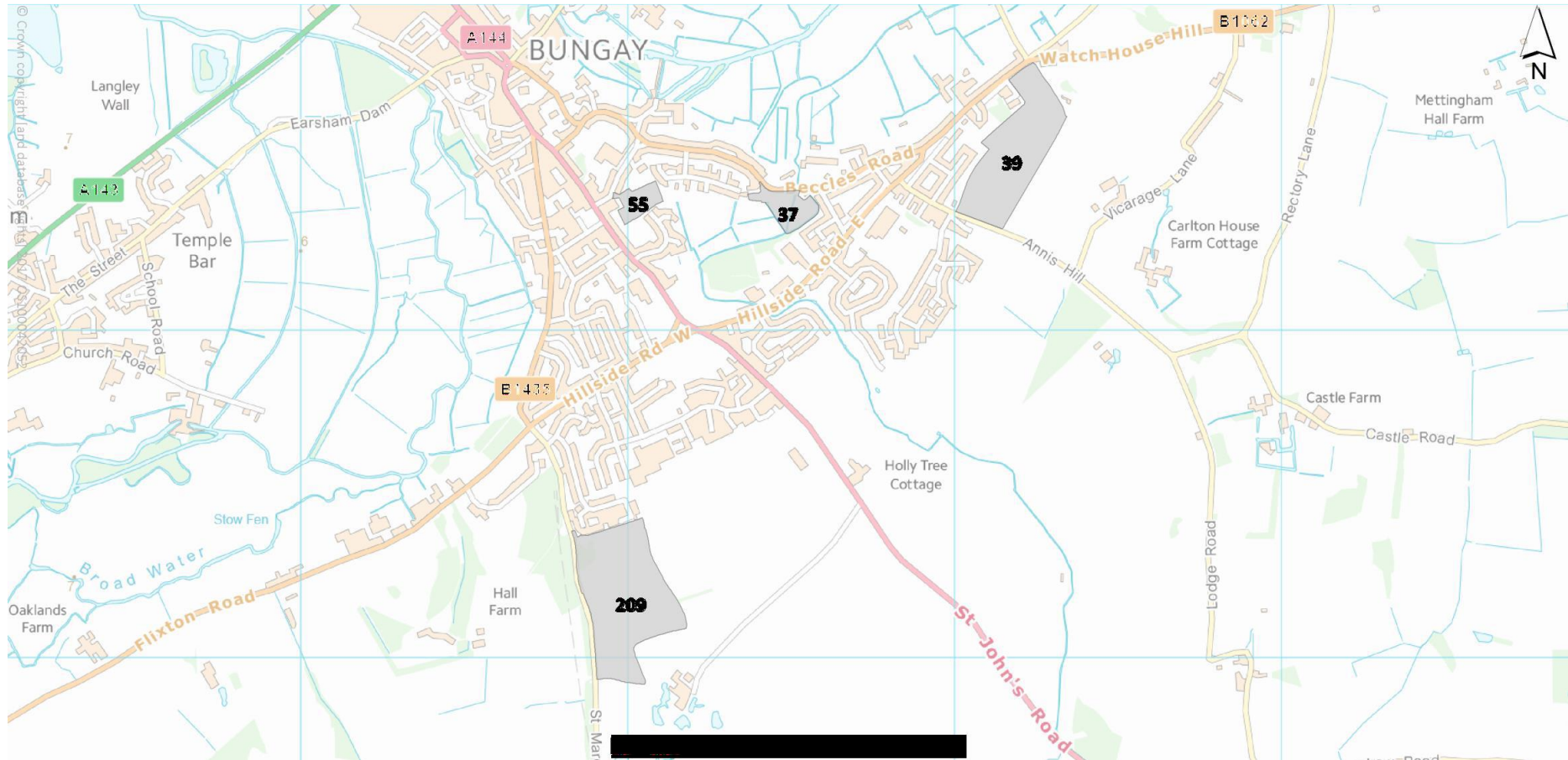
To deliver this growth, the local plan goes on to allocate two sites to the south of the town for housing. These are site WLP5.1 to the east of St John’s Road, and site WLP5.2 to the west of St John’s Road.

The Bungay Neighbourhood Development Plan (BNDP) is being prepared for its Regulation 14 consultation (its *draft* or *pre-submission* stage). Once adopted this will become part of the development plan for Waveney and will be used to determine planning applications in Bungay. A number of planning policies have been drafted covering areas such as the mix of housing that is needed, the design of them, and the protection and enhancement of the natural environment. It is the intention of the BNDP to include an allocation for housing, in addition to the two allocations in the recently adopted Waveney Local Plan. This will help the BNDP have much more control over where growth happens. It will also help give the town some time limited protection from speculative development.

Small Fish Planning Consultancy has been commissioned to undertake an independent site appraisal for the BNDP on behalf of Bungay Town Council to help determine which of the known sites are suitable, available and achievable, as required by the National Planning Policy Framework. The Waveney Local Plan invited a call for sites and a number of sites were put forward by landowners or developers. The district council assessed these, two of which were subsequently allocated in the Local Plan. It is the remaining four sites that have been assessed for the BNDP (see **Figure 1** overleaf).

The subsequent tables in this report assess each of the sites against a range of criteria such as flood risk, impact on the natural environment, and access. As part of each assessment, a recommendation is made for each site. Only one of the sites, BNDP-04 (WLP209) is recommended to be taken forward for potential allocation.

Figure 1. Sites put forward for the local plan



Key: WLP 37 is Site BNDP-01, WLP 39 is Site BNDP-02, WLP 55 is Site BNDP-03, and WLP site 209 is Site BNDP-04

Site BNDP-01. Land at Dukes Bridge, Beccles Road, Bungay NR35 1HZ (WLP 37)

Site summary

Site is 1.58 ha for potential housing. Currently used for grazing/ paddock. Beccles Road forms northern boundary with residential on opposite side of road; residential dwellings to east and southeast; west boundary comprises dwellings and agricultural / vacant land/open space. Sewage works to the southeast. The site is likely to be available as it was submitted to the borough council in its call for sites by the sole landowner. In terms of viability it is likely to be seen as achievable given its size and location. However, there are a number of significant constraints.

Suitability – Assessment table	
Highway infrastructure	Fine with road sufficient width, footway available
Highway safety and access	30mph. Safe highway access achievable, though with the loss of some vegetation. No recent injury accidents.
Sustainable access, including availability of footway	Good. Close to many facilities and footway available. Signed on-road cycle route and could potentially improve that route.
Compatibility with neighbouring uses	There is a sewage works less than 100 metres to the southeast. This may cause issues with smells.
Contribution to Green Corridor	Positive, linking Garden Close play area
Integrate functionally and visually with existing housing and the town	Well related, being adjacent to the settlement boundary
Contamination	No issues
Utilities	Borough Council Water Cycle Study indicates that the water recycling centre has capacity. Foul sewer network requires improvement, but this would be triggered by the grant of permission. Risk of encroachment to water recycling centre; a sewer pipe crosses the site.
Ecology and natural environment	Site is a floodplain grazing marsh which is a Biodiversity Action Plan habitat. Loss of this habitat could not be successfully mitigated. Difficult to see how a net gain in ecological value could be achieved by developing the site.
Historic environment	Development of the site would remove open space which contributes to the setting of the nearby listed building to the north west. Retention of open space close to the listed building would mitigate this harm to some extent.
Flood risk	This site is in flood zone 3a and parts of it also have surface water flooding.
Landscape/ townscape/ visual impact	

Suitability – Assessment table	
	Urban settlement. Development of the site would destroy the open character of the site which contributes positively to the townscape. Retention of open space on the site would mitigate this harm to some degree.
Open space	The site is a natural green area which contributes to biodiversity and holds floodwater, amongst other things. Loss of this would not be easily mitigated.
Other comments/ conclusions	Good transport infrastructure provision and sustainable access. Site is large and could accommodate around 45 homes, although likely to be less to mitigate impacts. Some issues, such as impact on heritage assets, could be mitigated. However, impact on biodiversity and flood risk are major constraints. Indeed, it would be subject to the sequential test due to flood risk and there are other sites in Bungay that are available. The local plan assessed the site as available and achievable, but not suitable. Recommend that that site is not taken forward.

Site BNDP-02 – Land at Grove Farm, Mettingham NR35 1TE (WLP 39)

Site summary

Site is 7.7 ha for potential housing. Currently in agricultural use. Agricultural land, farmhouse and farm buildings in same ownership to east; Annis Hill to south boundary with residential on opposite side of road; residential to west boundary. The site is likely to be available as it was submitted to the borough council in its call for sites by the sole landowner. In terms of viability it is likely to be seen as achievable given its size and location. However, there are a number of significant constraints.

Suitability - Assessment table	
Highway infrastructure	Borders both the Beccles Road and Annis Hill, access to both possible, though Annis Hill would need widening as it is narrow.
Highway safety and access	30mph on Annis Hill, which changes to NSP, and Beccles Road. Safe highway access should be achievable. No obvious accident issue.
Sustainable access, including availability of footway	Reasonable. Close to some facilities such as school. Footway available on the opposite side of Beccles Road and Annis Hill. Bus service nearby. Signed on-road cycle route and could potentially improve that route.
Compatibility with neighbouring uses	Fine
Contribution to Green Corridor	None
Integrate functionally and visually with existing housing and the town	Quite well related, being adjacent to the settlement boundary
Contamination	No issues
Utilities	Borough Council's Water Cycle Study indicates that the water recycling centre has capacity. Foul sewer network requires improvements, but permission would trigger improvements. Overhead lines on part of the site but this should not pose a constraint to development
Ecology and natural environment	There is a pond adjacent to the site in the northeast which could provide valuable habitat.
Historic environment	High archaeological potential
Flood risk	No issues
Landscape/ townscape/ visual impact	Tributary valley farmland. The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a very high sensitivity, a moderate value and making a major contribution to the setting of The Broads. As a result this landscape area has a very low capacity for new development. The northern part of the site would be visible in views of Bungay from the B1062. The main southern part of the site is higher than the town. The landscape character

Suitability - Assessment table
assessment recommends avoiding further encroachment from the town in addition to avoiding the creation of exposed or lit settlement edges.
Open space
No issues
Other comments/ conclusions
Reasonable transport infrastructure provision and sustainable access. Site is large and could accommodate around 200 homes, although likely to be less to mitigate impacts. Some issues, such as impact on biodiversity, could be mitigated. However, impact on landscape setting is a major constraint. Due to the harmful impact in the landscape and the setting of the Broads this site is not considered suitable for development. The local plan assessed the site as available and achievable, but not suitable.
Recommend that that this is not taken forward.

Site BNDP-03 – Land between Pilgrim's Way and Wingfield Street, Bungay NR35 1EZ (WLP 55)

Site summary

1.4 ha for potential housing. Currently overgrown allotments and domestic garages. Site wholly surrounded by residential properties/curtlages. The site is likely to be available as it was submitted by a developer contracted to buy the site. In terms of viability it is likely to be seen as achievable given its size and location. However, an investigation of petrol pump could delay commencement if contamination is discovered, and there are a number of significant constraints which might limit the developable area to just 0.2ha.

Suitability – Assessment table
Highway infrastructure
Narrow footways on Wingfield Street. Wingfield Street varies in width, and is below 4.5m from the site entrance to the main St John's Road.
Highway safety and access
30mph on Wingfield Street, with advisory 20mph in school safety zone. Not clear that safe highway access is achievable, with the site entrance on a bend which limits forward visibility for vehicles turning into the site. No major accident problem in the immediate area though.
Sustainable access, including availability of footway
Narrow footways on Wingfield Street might limit their use for some, such as with certain children's buggies or wheelchairs. However, a number of services and facilities (not least the primary school) are close.
Compatibility with neighbouring uses
Fine
Contribution to Green Corridor
Potentially, depending on route of corridor
Integrate functionally and visually with existing housing and the town
Very well related
Contamination
Petrol pump in northwest corner of the site will require investigation.
Utilities

Suitability – Assessment table
Water Cycle Study indicates that water recycling centre has capacity. Foul sewer network requires improvement. There is a low encroachment risk to the water recycling centre. A sewer pipe crosses the site.
Ecology and natural environment
There are mature trees and hedgerows on the site. Protection / enhancement of these would mitigate harmful effects.
Historic environment
Part of the site is in a conservation area. This piece of the site is currently untidy and there is the opportunity to enhance the conservation area through sensitively designed development
Flood risk
Large areas of the site are at risk from surface water flooding and the majority of the site is in flood risk zone 2 (1 in 1,000 year event) as identified by the Strategic Flood Risk Assessment.
Landscape/ townscape/ visual impact
Settlement extent character area. Northwest part of the site is in a conservation area. There is the potential to enhance the conservation area subject to high quality design. Site is somewhat untidy and unkempt currently.
Open space
The site is allotment land but not currently used as such and is very overgrown.
Other comments/ conclusions
The site is partially within flood zone 2. As such, should the sequential test/approach be passed the site has the capacity to accommodate up to 30 dwellings providing dwellings in the flood zone can pass the exceptions test. Should the sequential test/approach not be passed (and there are other sites in Bungay not in the flood zone) the site could only accommodate 5 dwellings on land outside of the flood zone, just 0.2ha. Given the highway safe access/ egress concerns, it might in any case not be acceptable even for small development. Be that as it may, the site is within Settlement Boundary. This, in principle, will allow for development of housing on this site outside of the flood zone as a windfall site if an application can show that highway constraints can be overcome, and so there is no need to consider allocating it. The local plan assessed the smaller site as suitable, available and achievable.
Recommend the site is not taken forward for allocation.

Site BNDP-04 – Land south of Mountbatten Road, Bungay (WLP 209)

Site summary

10.28 ha for potential housing. Site currently used for agriculture. North of the site is residential. Northeast is the high school. East is currently agricultural though allocated for housing/ employment. South is a former reservoir. West is a road beyond which is agricultural. There are some farm buildings to the south but no smells were evident during site visit, so largely compatible with neighbouring uses. The site is likely to be available as it was submitted on behalf of the landowner. In terms of viability it is likely to be seen as achievable given its size and location. Improving highway access and archaeological investigation could delay commencement, but no other significant constraints

Suitability - Assessment table
Highway infrastructure
St Margaret's Road to the west is narrow and generally unsuitable for any significant increase in traffic. Access via neighbouring estate roads to the north is possible but not ideal. Likely that the best solution would be access from allocated site WLP5.2 from the local plan. This would require joint masterplanning for the wider site. WLP5.2 will have footways and cycle routes.
Highway safety and access
If access is achievable through allocated site WLP5.2, new highway infrastructure will be provided to site BNDP-04, including for pedestrians and cyclists. Traffic would access St John's Road with a new junction scheme that will need to be agreed. The speed limit changes from NSP to 30mph adjacent to WLP5.2. This has been established through the local plan process as a safe and acceptable means of access to WLP5.2 and so it would be safe and acceptable for site BNDP-04. No major accident problem in the immediate area.
Sustainable access, including availability of footway
Adjacent to a regional cycle route on St Margaret's Road. Could connect with cycle routes delivered as part of WLP5.2. Footway access can be through WLP5.2 and the estate to the north, and possibly via proposed Green Corridor. Public transport on St John's Road. A number of services and facilities, such as the High School, accessible via sustainable transport.
Compatibility with neighbouring uses
Fine
Contribution to Green Corridor
Potentially, depending on precise route of corridor

Suitability - Assessment table	
Integrate functionally and visually with existing housing and the town	
	Quite well related, being adjacent to the settlement boundary on the northern edge, and adjacent to WLP5.2 to the east
Contamination	
	No issues
Utilities	
	No issues. Water Cycle Study indicates that water recycling centre has capacity.
Ecology and natural environment	
	No issues
Historic environment	
	High archaeological potential. There is a grade II listed building a little over 100m to the south, and another around 500m to the west.
Flood risk	
	Small strips of high, medium and low surface water flood risk around the edge of the site.
Landscape/ townscape/ visual impact	
	Most of site is farmed plateau clayland. North west corner has a mixture of rural river valleys and tributary valley farmland. Development would form a large incursion into open countryside. The site has boundary hedging and trees but no other features of landscape value. The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a low sensitivity, a low value and a high capacity for development. The wooded area in the northwest corner may be difficult to develop as the ground appears to be uneven. The site adjoins the built-up area to the north, and will adjoin WLP5.2 to the east.
Open space	
	No issues
Other comments/ conclusions	
	257 dwellings at a density of 25 dwellings per hectare. Low housing density to take account of edge of settlement location and incursion into the landscape. The local plan concluded it was suitable, available and achievable. The key constraint is perhaps highway access. This would ideally be through WLP5.2 and so the site, if it were to be allocated, would need to be part of the masterplanning for WLP5.2. Recommend that the site is taken forward.