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By email only

Dear Sir or Madam,

**Greater Norwich Local Plan (GNLP) Consultation
Comments submitted in response to the Local Plan Site Proposals Document and supporting HELAA
Site Reference: Land to the east of Church Road Kirby Cane (GNLP 0344)**

Savills UK Ltd, (Rural, Energy & Projects) is instructed by our client, Trustees of Major JS Crisp, to submit a representation in response to the Greater Norwich Local Plan (GNLP) Consultation. The representation is made in respect of the above site, submitted to the GNLP Call for Sites in 2016.

Our client is pleased that the site has been considered, and identified as suitable within the HELAA. We have reviewed the assessment of the site provided within the Site Proposals Document and HELAA, and make the following comments in relation to the site's delivery.

Firstly though, it is pertinent to refer to national planning policy and guidance, namely that set out in the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and Housing White Paper February 2017.

The NPPF establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. The three dimensions to sustainable development, as set out in the NPPF, require the planning system to perform an economic, social and environmental role. For plan making, Paragraph 14 of the NPPF, requires that Local Planning Authorities positively seek opportunities to meet the development needs of their area.

Paragraph 55 of the NPPF outlines that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Residential development in such settlements can make a significant contribution to the maintenance and continuing provision of local services and facilities for community use, as required by Section 3 of the NPPF: Supporting a Prosperous Rural Economy.

The Housing White Paper, 'Fixing our broken housing market', published in February 2017 highlights the importance of 'Making land available in the right places' and includes proposals for 'Supporting small and medium sized sites, and thriving rural communities' within Chapter 1 of the document. The White Paper identifies a number of proposed changes to the NPPF to facilitate these ambitions, including the expectation for 'local planning authorities to identify opportunities for villages to thrive' (paragraph 1.33).

This was reaffirmed in the recently published consultation on changes to the National Planning Policy Framework (March 2018). Paragraph 80 of this consultation document notes:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services.”

Equally, National Planning Practice Guidance (NPPG) notes that all settlements can play a role in delivering sustainable development in rural areas¹.

Below, the site is considered against the tests within the NPPG², confirming that the site is suitable, available and achievable for development purposes:

Suitable

Development in rural areas is considered vital to the long term sustainability of rural communities.

Encouraging growth in sustainable settlements within rural areas is considered to be in accordance with Paragraph 55 of The Framework, which also notes that residential development in such settlements can make a significant contribution to the maintenance and continuing provision of local services and facilities for community use (Section 3: Supporting a Prosperous Rural Economy).

The site is considered to be a suitable location for residential development. Kirby Cane, alongside Ellingham, is identified as a 'Service Village' within the adopted Joint Core Strategy (2011), recognising the level of services, facilities and infrastructure available there within. Services and facilities include a Public House and a Primary School and are within walking distance of the site. Kirby Cane also benefits from regular bus services to the market towns of Beccles and Southwold where a wider range of amenities are available.

There are no known physical limitations or constraints on the site which would make development of the site difficult or unacceptable. The site is not located within protected areas such as Greenbelt, AONB or Flood Zones 2 and 3. Nor does it directly impact upon any designated heritage assets. The site is not directly impacted by a PROW, although there is a PROW along the south eastern boundary which may be affected by development of the site.

The site benefits from an existing access off of Church Road which could be upgraded, if required, and potentially brought within the 30mph zone as part of any development.

The site is north of the Kirby Cane settlement boundary, and close to nearby residential development. It is well located for the highway network and bus stops are located within walking distance.

The site is neatly bounded by extensive mature trees and hedging along its southern boundaries, whilst to the north it is open to the A143. Whilst having some intrinsic value, it is considered that it does not make a significant contribution to the wider landscape character.

The scale of the site would enable the creation of a housing scheme on either all or part of the land, which includes generous landscaping and Public Open Space as part of any proposals.

Available

The site is considered available for development being within the control of a single owner. Should the site be accepted by the Council as a location for housing development, Savills would be able to act on our client's behalf to take the site forward with a view to identifying a suitable development partners as soon as possible.

¹ Paragraph: 001 Reference ID: 50-001-20160519

² Paragraph: 019 Reference ID: 3-019-20140306; Paragraph: 020 Reference ID: 3-020-20140306; and Paragraph: 021 Reference ID: 3-021-20140306

Achievable

As noted above, there are no known 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 easily connectable and readily available. It is noted that some improvements may be required to certain utility infrastructure.

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

Site Proposals Document Assessment

The site proposal document identifies Land to the east of Church Road Kirby Cane as GNLP 0344, and in respect of its deliverability states:

“GNLP0344 is adjacent to the A143 to the north of Kirby Cane. Therefore, noise mitigation measures are likely to be required. The site is also slightly remote from the existing built up area and consequently less sympathetic to its built form.”

Comment: In respect of potential noise arising from the sites proximity to the A143. A noise impact assessment with appropriate mitigation measures could be produced as part of any application should the land be successfully allocated for development. The scale of the site is sufficient to ensure that noise mitigation measures and design features could be accommodated as part of any proposed development. In addition, whilst located on the edge of the settlement, this could present an opportunity for a housing scheme which includes generous landscaping and Public Open Space, as a means of uniting the village with the countryside beyond.

HELAA Assessment

A HELAA was undertaken in December 2017 and forms part of the evidence base for the site proposals document. Our clients comments on the HELAA are as follows:

Accessibility

CONSTRAINTS ANALYSIS		IMPACTS ANALYSIS	
Access	Amber	Significant Landscapes	Amber
Accessibility to Services	Amber	Townscapes	Amber
Utilities Capacity	Amber	Biodiversity and Geodiversity	Amber
Utilities Infrastructure	Green	Historic Environment	Amber
Contamination and Ground Stability	Green	Open Space and GI	Green
Flood Risk	Green	Transport and Roads	Amber
Market Attractiveness	Green	Compatibility with Neighbouring Uses	Amber

“HELAA Site Suitability Conclusion

Initial highway evidence has highlighted concerns that the possibility of creating suitable access to the site is severely constrained. Also, the local road network is considered to be unsuitable either in terms of road capacity, or lack of footpath provision.”

Comment: The site benefits from an existing access off of Church Road which could be upgraded as part of any development. There is adequate land within the boundary of the site to investigate the potential for a new access with sufficient visibility.

The NPPF makes it clear that development should only be prevented on highways grounds where it can be demonstrated that the residual cumulative impacts of development are severe . A transport assessment would be produced by a qualified Highways Engineer as part of any future development proposals.

Surface Water Flooding

“HELAA Site Suitability Conclusion

...sections at risk of surface flooding...”

Comment: Environment Agency surface water flood mapping indicates that a small section of the site is susceptible to surface water flooding, this being the area of land to the north of the site. Further investigation into site specific drainage issues would be undertaken, however there are no known reasons why surface water drainage issues could not be addressed.

Landscape

IMPACTS ANALYSIS

Significant Landscapes	Amber
Townscapes	Amber
Biodiversity and Geodiversity	Amber
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Amber
Compatibility with Neighbouring Uses	Amber

Comment: The site is located north of the Waveney River Valleys, a locally significant landscape area and the Broads. However, the site is separated by the main village body. The site is bounded by extensive mature trees and hedging along its southern boundaries and borders the A143 to the north. Whilst the site slopes gently to the south, in a wider context it is largely screened from the surrounding countryside and wider vistas by the mature landscaping. Whilst having some intrinsic value, it is considered that it does not make a significant contribution to the wider landscape character. Furthermore, appropriate landscaping could be implemented as part of any development of the site.

Biodiversity

IMPACTS ANALYSIS

Significant Landscapes	Amber
Townscapes	Amber
Biodiversity and Geodiversity	Amber
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Amber
Compatibility with Neighbouring Uses	Amber

“HELAA Site Suitability Conclusion

...within 3,000 m buffer to Ramsar Site, special area of conservation, special protection area to the south east..."

Comment: In respect of any potential impact upon the Ramsar site and area of conservation. This would be addressed by way of appropriate protected species surveys and the implementation of appropriate mitigation, undertaken and produced by a CIEEM registered ecology consultants. Where possible, biodiversity net gains would be sought in line with the NPPF³.

Utilities Capacity

CONSTRAINTS ANALYSIS	
Access	Amber
Accessibility to Services	Amber
Utilities Capacity	Amber
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Green
Market Attractiveness	Green

Comment: It is noted that some improvements may be required to certain utility infrastructure. This is an issue reflective across the entirety of Kirby Cane. It is not considered that this would prohibit new development from being delivered.

Accessibility to Services

CONSTRAINTS ANALYSIS	
Access	Amber
Accessibility to Services	Amber
Utilities Capacity	Amber
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Green
Market Attractiveness	Green

“HELAA Site Suitability Conclusion

...and not particularly well related to services.”

Comment: As noted above, Kirby Cane, alongside Ellingham, is identified as a ‘Service Village’ within the adopted Joint Core Strategy (2011), recognising the level of services, facilities and infrastructure located there. These facilities include a public house and a primary school which are within walking distance of the site. Kirby Cane is also a short distance from the Village of Geldeston and Service Centre of Ditchingham. The village also benefits from regular bus services to the market towns of Beccles, Bungay and Southwold where further of services and facilities are available.

Compatibility with Neighbouring Uses and Townscape

³ Paragraph: 109, 118

IMPACTS ANALYSIS

Significant Landscapes	Amber
Townscapes	Amber
Biodiversity and Geodiversity	Amber
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Amber
Compatibility with Neighbouring Uses	Amber

“HELAA Site Suitability Conclusion

It is disconnected from the built up area... Other constraints include noise...”

Comment: Noise and built environment are addressed in our assessment of the Site Proposals Document above.

Historic Environment

IMPACTS ANALYSIS

Significant Landscapes	Amber
Townscapes	Amber
Biodiversity and Geodiversity	Amber
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Amber
Compatibility with Neighbouring Uses	Amber

“HELAA Site Suitability Conclusion

...proximity to listed buildings... The Historic Environment has advised of a significant constraint Pewter Hill Anglo Saxon cemetery and Roman site.”

Comment: There are no listed buildings within 200m of the site. It is not considered that development of the site would have a detrimental impact on, or result in any harm to the setting of any designated heritage assets. Archaeological works could be conditioned.

Conclusion

It is considered that the land to the east of Church Road Kirby Cane (GNLP 0344) is sustainable and deliverable as defined by the NPPF, and a suitable location for residential development. The site, within the ownership of Trustees of Major JS Crisp, represents a viable option for housing growth within the District.

Should the site be accepted as an allocation within the Local Plan, Savills would be able to act on our client’s behalf to take the site forward with a view to identifying a suitable development partner as soon as possible.

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

Yours faithfully,

Lynette Swinburne MRTPI
Associate Director, Rural Consultancy Services (RCS)

Cc: Trustees of Major JS Crisp, c/o Gwyn Church, Savills, 50 Princes Street, Ipswich, IP11RJ