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PQDJ 411873



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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 at Rose Farm off Bungay Road, Scole (GNLP 0338)**

Savills UK Ltd (Rural, Energy & Projects), is instructed by our client, Sir Rupert Mann Bt, to submit a Call for Sites submission (submitted via GNDP online portal) and supporting representation in response to the Greater Norwich Local Plan (GNLP) Consultation. The submission and representation are made in respect of the same land holding as GNLP0338 previously submitted to the GNLP Call for Sites in 2016. However, the submission has been revised to reflect a smaller land area being reduced from 1.45ha to 0.60ha. It is considered that the reduced land area would result in a more sympathetic development, having a lesser impact on the existing village and surrounding landscape.

Our client is pleased that the previous submission was considered, and identified as suitable within the HELAA. It is thought that the reduction in site area would further contribute towards making this land a suitable allocation within the Emerging Local Plan.

Given that this call for sites submission reflects the same land holding, we have reviewed the assessment of the site (GNLP0338) 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. Scole is identified as a 'Service Village' within the adopted Joint Core Strategy (2011), recognising the level of services, facilities and infrastructure available there within. Scole's facilities include public houses/restaurants and a primary school and are within walking distance of the site. The village also benefits from regular bus services to the market town of Diss where further 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 impact upon any designated heritage assets. The site is not subject to any PROW which may be affected by development of the site.

The site benefits from an existing access off of Bungay Road (30mph) which could be upgraded, if required, as part of any development.

The site is immediately adjacent to Scole's settlement boundary. An existing residential estate is located directly to the west and there is frontage development to the north. Allocating the site for housing would not appear out of character with the existing built form, providing a natural extension to this part of the settlement.

To the north of the site are a number of agricultural buildings which could be demolished upon the site coming forward for development.

The site is neatly bounded by extensive mature trees and hedging along its eastern boundary which largely screens the site from the surrounding countryside. Whilst having some intrinsic value, due to the site's largely enclosed nature, it is considered that it does not make a significant contribution to the wider landscape character. Furthermore, the primary area put forward within the revised submission is an existing farmyard with agricultural buildings in situ. As such, any potential impact is lessened.

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

The site can therefore present a suitable location for the managed growth of Scole, particularly given its relationship with the existing village. It is of an appropriate scale in relation to the form of the village, and as such, this site presents an opportunity to create an attractive and sympathetic development within a sustainable settlement.

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 sites forward with a view to identifying a suitable development partners as soon as possible.

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.

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

Site Proposals Document Assessment

The Site Proposal Document refers to the 1.45 hectare site (GNLP0338) submitted through the Call for Sites in 2016. However, the points raised are equally applicable to the revised submission.

In respect of the sites deliverability, the site proposal document states:

“...the site fronts onto Bungay Road where there are no footpaths and has access issues.”

Comment: The site benefits from an existing access off of Bungay Road which could be upgraded, if required, as part of any development. There is adequate land within the boundary of the site to form a new access with sufficient visibility. The existing red brick buildings fronting the street would be removed as part of any redevelopment. Bungay Road is a main road through the village which appears to have sufficient capacity to accommodate development of the site. A public footpath exists on the opposite side of Bungay Road which could be connected to as part of the redevelopment of the site by way of a crossing.

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 would be severe. A Transport Assessment would be produced, if required, by a qualified Highways Engineer prior to submission of any planning application. However, it is not anticipated at this stage that highway impacts relating to the development of the site would be severe.

HELAA Assessment

A HELAA was undertaken in December 2017 and forms part of the evidence base for the Site Proposals Document. The HELAA refers to the 1.45 hectare site (GNLP0338) submitted through the Call for Sites in 2016. However, the points raised are equally applicable to the revised submission. Our clients comments on the HELAA are as follows:

Accessibility

CONSTRAINTS ANALYSIS		IMPACTS ANALYSIS	
Access	Amber	Significant Landscapes	Amber
Accessibility to Services	Green	Townscapes	Green
Utilities Capacity	Amber	Biodiversity and Geodiversity	Amber
Utilities Infrastructure	Green	Historic Environment	Green
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: Access is addressed in our assessment of the Site Proposals Document above.

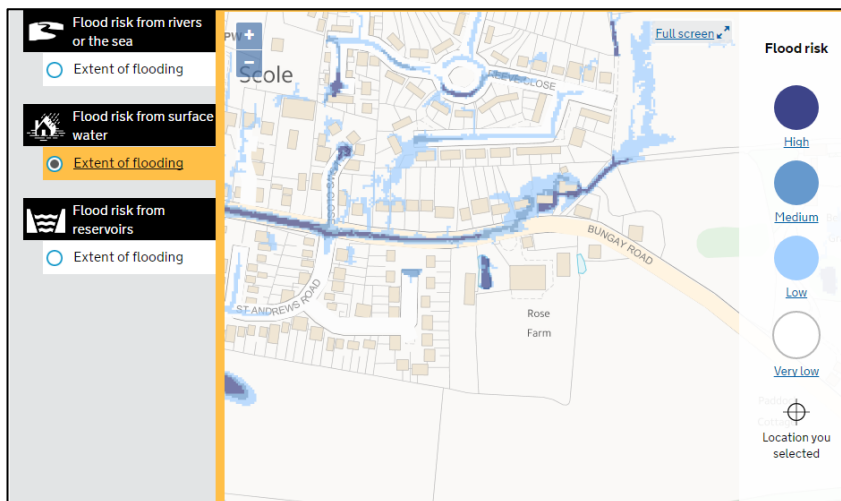
Surface Water Flooding

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

“HELAA Site Suitability Conclusion

Other constraints include sections at high risk of surface water 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 immediately surrounding the pond to the north west of the site. Further investigation into site specific drainage issues will be undertaken, however there are no known reasons why a Sustainable Urban Drainage System (SUDS) could not be incorporated, thus addressing any pressures on the current drainage network. Development could be designed to incorporate soft edges around the pond.



(Source: Environment Agency)

Landscape

IMPACTS ANALYSIS

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

Comment: The site is located within the Waveney River Valleys, a locally significant landscape area. However, the site is immediately adjacent to an existing residential estate to the west and so development of the site would not appear out of character with the existing built form. The site is neatly bounded by extensive mature trees and hedging along its eastern boundary which largely screen the site from the surrounding countryside. The site, whilst having some intrinsic value, is not considered to make a significant contribution to the wider landscape character due to the site's largely enclosed nature. Appropriate landscaping could be implemented as part of any development of the site. Furthermore, the primary area put forward within the revised submission is an existing farmyard with agricultural buildings in situ. As such, any potential impact is lessened.

Biodiversity

IMPACTS ANALYSIS

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

Comment: In respect of any potential impact upon protected species. 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.

Conclusion

It is considered that the revised submission on land at Rose Farm off Bungay Road, Scole is sustainable and deliverable as defined by the NPPF, and a suitable location for residential development. The site, within the ownership of Sir Rupert Mann Bt, represents an attractive option for housing growth within the village and wider District.

The revised submission reflects a land area of 0.60ha, being reduced from 1.45ha. It is considered that the reduced land area would result in a more sympathetic development, having a lesser impact on the existing village and surrounding landscape.

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,

Gareth Watts MRTPI
Planner, Rural, Energy & Projects

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³ Paragraph: 109, 118