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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 west of Gissing Road (GNLP 0349)**

Savills UK Ltd, (Rural, Energy & Projects) is instructed by our client, Sir Rupert Mann Bt, 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. Burston is identified as an ‘Other Village’ within the adopted Joint Core Strategy (2011), whilst it has been upgraded to a ‘Service Village’ within Appendix 3 of the GNLP recognising the level of services, facilities and infrastructure available there within. These include a public house/restaurant and a primary school 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. A PROW runs across the northern boundary of the site.

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

The site is immediately adjacent to Burston’s settlement boundary. The main body of Burston is located directly to the south of the site whilst frontage development is located to the east. Development of the site would not appear out of character with the existing built form, providing a natural extension to this part of the settlement.

The site is neatly bounded by extensive trees and hedging along its northern and western boundaries which largely screen 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.

The site could therefore present a suitable location for the managed growth of Burston, 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 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 Burston currently has sewerage infrastructure constraints. This is an issue reflective across the entirety of Burston. It is not considered that foul drainage would prohibit new development from being delivered.

There are no other 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 Burston and would make a material contribution to the housing targets of the District.

Site Proposals Document Assessment

The site proposal document identifies land at Rose Farm off Bungay Road, Scole as GNLP0349, and in respect of its deliverability no obvious constraints are identified.

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	Amber	Transport and Roads	Amber
Market Attractiveness	Green	Compatibility with Neighbouring Uses	Amber

“HELAA Site Suitability Conclusion

Initial highway evidence has highlighted concerns that there are potential access constraints on the site, but these could be overcome through development. Also, subject to suitable footpath provision, any potential impact on the functioning of local roads could be reasonably mitigated.”

Comment: The site benefits from an existing access off of Gissing 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 and to widen Gissing Road. Equally there would appear to be land either aside of Gissing Road within the ownership of the Highways Authority which may allow for some widening to occur, should this be necessary. The existing junction to Station Road is considered sufficient with good visibility available. Station Road is a main road through the village with sufficient capacity to accommodate development of the site. Footpaths are available throughout the village which could be connected to as part of the development.

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.

Accessibility to Services

CONSTRAINTS ANALYSIS

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

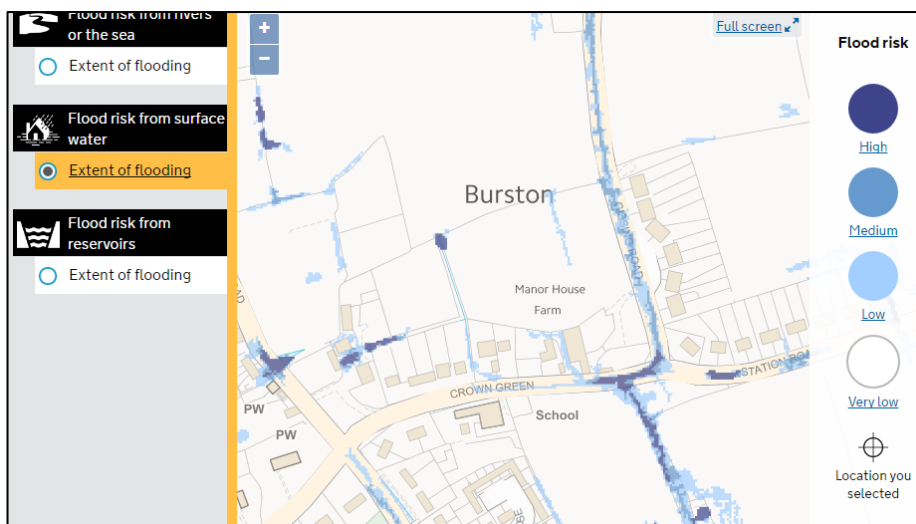
Comment: As previously noted, Burston has been upgraded to a ‘Service Village’ within Appendix 3 of the GNLPP recognising the level of services, facilities and infrastructure available there within. These include a public house/restaurant and a primary school within walking distance of the site. The village also benefits from regular bus services to the market town of Diss where further amenities are available.

Flood Risk

CONSTRAINTS ANALYSIS

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

Comment: Environment Agency surface water flood mapping indicates that a small section of the site is susceptible to surface water flooding, this being an area of land running north to south towards the centre of the site. There is also an area susceptible to surface water flooding along the western boundary. Further investigation into site specific drainage issues would 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.



(Source: Environment Agency)

Significant Landscapes

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 within land designated as Waveney tributary farmland, a locally significant landscape area. However, the site is well located to the main body of Burston directly to the south of the site whilst frontage development is located to the east. Development of the site would not appear out of character with the existing built form, providing a natural extension to this part of the settlement. The site is neatly bounded by extensive trees and hedging along its northern and western boundaries which largely screen 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, appropriate landscaping could be implemented as part of any development of the site.

Utilities Capacity

CONSTRAINTS ANALYSIS

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

“HELAA Site Suitability Conclusion

Anglian Water has advised of major constraints to provision of sewerage infrastructure - substantial off-site sewerage required to connect FW.”

Comment: As previously stated, it is noted that Burston currently has sewerage infrastructure constraints. This is an issue reflective across the entirety of Burrton. It is not considered that foul drainage would prohibit new development from being delivered.

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

...possible impact to listed building and conservation area.”

Comment: In relation to the historic environment, this is addressed within Chapter 12 of the Framework. Paragraph 132 notes:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.”

Paragraphs 134 set out what the considerations should be when determining an application which impacts designated heritage assets. It states:

“134. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”

The Planning (Listed Buildings and Conservation Areas) Act 1990 in Section 66 adds that:

“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority, or, as the case may be, the Secretary of State 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.”

Section 72 adds that it is a duty, with respect to any buildings or land in a conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

It is not considered that the proposal would have a detrimental impact or result in any harm to the setting of any listed buildings or the Burston conservation area. In addition, when considering the impact on heritage assets, it is considered that the public benefits associated with the development of this site would weigh strongly in favour of its development..

Work and employment would be created for both individuals and businesses involved in the construction elements of the development and sourcing of materials. It is also considered that any construction workers and local trades will make use of local services and facilities during the construction period. In the long-term it is likely trades people will be required to help maintain any properties. Additionally, it is considered that the occupiers of any development would make use of local services and facilities ensuring their vitality, viability and longevity thus contributing to the local economy.

A heritage impact assessment would be produced, if required, prior to submission of any planning application should the site be allocated. Furthermore, appropriate archaeological surveys could be conditioned should planning be pursued on the site.

Biodiversity and Geodiversity

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

Other constraints include SSSI within 3,000m, HELAA Assessment...”

Comment: In respect of any potential impact upon the SSSI. 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 land to the west of Gissing Road (GNLP 0349) 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 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,

Gareth Watts MRTPI
Planner, Rural, Energy & Projects

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³ Paragraph: 109, 118