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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 Ipswich Road, Dickleburgh (GNLP 0350)**

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 areas<sup>1</sup>.

Below, the site is considered against the tests within the NPPG<sup>2</sup>, 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. Dickleburgh is identified as a ‘Service Village’ within the adopted Joint Core Strategy (2011), recognising the level of services, facilities and infrastructure available there within. These include a public house, village store and a primary school which are within walking distance of the site. The village also benefits from regular bus services to the market town of Diss where a plethora of services and facilities 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. The site is not subject to any PROW which may be affected by development of the site.

The site benefits from good access to Ipswich Road. Ipswich Road is the main road running through Dickleburgh and appears to have sufficient capacity at this point to accommodate development of the site. A footpath runs along the length of the site. It is anticipated that an access with sufficient visibility could be installed as part of any development.

The site is immediately adjacent to Dickleburgh’s settlement boundary. The main body of Dickleburgh is located directly to the north of the site whilst there is some sporadic housing to the south. Visually the site would appear as infill being flanked by residential development to the north and south. 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 southern boundaries. The site is open to the east, and whilst having some intrinsic value, it is considered that it does not make a significant contribution to the wider landscape character.

The site can therefore present a suitable location for the managed growth of Dickleburgh, 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.

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<sup>1</sup> Paragraph: 001 Reference ID: 50-001-20160519

<sup>2</sup> Paragraph: 019 Reference ID: 3-019-20140306; Paragraph: 020 Reference ID: 3-020-20140306; and Paragraph: 021 Reference ID: 3-021-20140306

**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 partner 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 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 Dickleburgh and would make a material contribution to the housing targets of the District.

**Site Proposals Document Assessment**

The site proposal document identifies Land to the west of Ipswich Road, Dickleburgh as GNLP0350, 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	
Access	Amber
Accessibility to Services	Green
Utilities Capacity	Amber
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Green
Market Attractiveness	Green

**Comment:** As stated previously, the site benefits from good access to Ipswich Road. Ipswich Road is the main road running through Dickleburgh and is of sufficient capacity at this point to accommodate development of the site. A footpath runs along the length of the site. An access with sufficient visibility could be installed as part of any 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.

## Townscape

### IMPACTS ANALYSIS

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

#### “HELAA Site Suitability Conclusion

*Whilst not in the conservation area, there are some townscape considerations to elongating development along Norwich Road, and the site is opposite the Grade II Manor Farmhouse.”*

**Comment:** As stated previously, the site is immediately adjacent to Dickleburgh’s settlement boundary. The main body of Dickleburgh is located directly to the north of the site whilst there is some sporadic housing to the south. Visually the site would appear as infill. 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.

## Historic Environment

### IMPACTS ANALYSIS

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

#### “HELAA Site Suitability Conclusion

*Whilst not in the conservation area, there are some townscape considerations to elongating development along Norwich Road, and the site is opposite the Grade II Manor Farmhouse.”*

**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 Dickleburgh 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.

### **Conclusion**

It is considered that the land to the west of Ipswich Road, Dickleburgh (GNLP 0350) 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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