

16<sup>th</sup> March 2020  
L 200316 SAV GNLP - Frontier Local Plan Reps



Greater Norwich Local Plan Team  
PO Box 3466  
Norwich  
NR7 7 NNX

Savills (UK) Limited  
DL: +44 (0) 20 7409 8025  
F: +44 (0) 20 7495 3773

33 Margaret Street  
London W1G 0JD  
T: +44 (0) 20 7499 8644  
savills.com

Dear Sir or Madam

## **GREATER NORWICH LOCAL PLAN – REGULATION 18 CONSULTATION REPRESENTATIONS MADE ON BEHALF OF FRONTIER AGRICULTURE LTD**

### **Introduction**

We write on behalf of our client, Frontier Agriculture Limited (**'FAL'**), in relation to land west of Sandy Lane, Diss (**'the Site'**).

We hereby provide our client's representations to the current Regulation 18 consultation on the draft Greater Norwich Local Plan (**'GNLP'**) in relation to the Site. These representations follow submissions to the previous Call for Sites exercise by our client.

This correspondence provides our client's representations to the current consultation in order to assist the production of the new Local Plan. We would however welcome the opportunity to meet with Officers in due course, in order to discuss the enclosed comments in more detail.

### **The Site**

By way of background, FAL is the landowner and occupier of land west of Sandy Lane, Diss (**'the Site'**), which extends to circa 3.6ha.

The Site is located within the defined Development Boundary for Diss, is adjacent to Diss Railway Station and is accessible by a range of transport modes. The Site is currently occupied by a range of B Class uses associated with our client's operation, which include a seed processing plant, crop protection store, grain store, and a grain and seed laboratory.

The Site is fully controlled by FAL and there are no significant constraints to its future development.

### **General Comments**

The National Planning Policy Framework (**'NPPF'**) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

Local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.  
Registered office: 33 Margaret Street, London, W1G 0JD



They should be consistent with the principles and policies of the NPPF, and should be aspirational but realistic to address spatial implication of economic, social and environmental dimensions.

As the GNLP emerges, it is important that it adheres to the requirements of the NPPF in positively promoting new development across the Local Plan area.

### **Site Specific Allocation**

The Site is proposed to be allocated for development in the emerging GNLP under Site Specific Policy GNLP0102 ('**the Policy**'). This identifies the Site as being suitable for at least 200 homes of which 33% are intended to be affordable.

Our client fully **supports** the principle of the allocation of the Site for comprehensive redevelopment. The intensification of the development capacity of the Site reflects its sustainable location, accessibility and deliverability within the emerging Plan period. The redevelopment of the Site can help to meet strategic objectives in terms of residential or employment floorspace within the GNLP area.

Our client does however have a number of comments in relation to the specific requirements of the Policy, which are detailed further below. We also comment on the Site Specific Policies in relation to nearby sites, where relevant.

#### *Proposed Land Uses*

Whilst our client **supports** the proposed allocation of the Site for residential development, we consider that the Policy should also include flexibility to support redevelopment for employment uses (Class B). This would reflect the existing and established land use and would still provide support for appropriate intensification should residential development not be realised. Given the existing use of the Site, such development would be an appropriate alternative use of the Site and acceptable in land-use terms.

The Policy should be amended to include flexibility and support for both residential or employment land uses. This would ensure the Plan is positively prepared and will make the most effective use of previously developed land.

In terms of the proposed allocation for residential development, we have the following comments:

- **Number of Homes:** The Site is identified for development of at least 200 homes. Whilst our client supports the general approach to the Site and the acknowledgement of its significant potential in terms of development capacity, the Policy should remain flexible. The specific number of homes is a useful indicative figure for the development capacity of the Site but it should not be set as a minimum threshold given the embryonic stage of redevelopment.

Flexibility would reflect the need for an appropriate masterplanning exercise to be undertaken in order to determine an appropriate quantum or range of dwellings that could be accommodated. For example, it may be that following this exercise, the Site is considered more suitable for a lower quantum than set out in the Policy, depending on site specific design requirements and an appropriate housing mix.

It is therefore recommended that the Policy be amended to allow for flexibility as to the precise quantum of homes that could be delivered on the Site. Whilst the capacity of 200 homes can be maintained within the Policy, this should be as an indicative capacity figure and not a minimum requirement which may be unduly restrictive.

- **Affordable Housing:** The viability of the Site and any future redevelopment scheme is unknown at this stage. Given the historic employment use of the site, there is the potential for increased costs linked to matters such as remediation. In order to maximise the potential of the site through

comprehensive redevelopment the site specific policy should not impose specific requirements linked to the deliverability of affordable housing in percentage or unit terms.

Any future redevelopment of the Site for residential land uses would be subject to the primary policies relating to affordable housing within the wider GNLP. It follows that an appropriate level of affordable housing can be determined at the application stage subject to appropriate viability evidence.

A flexible site specific policy would ensure a viable development scheme can be prepared and promoted. That would ultimately ensure the full development capacity of the Site can be realised which in turn would deliver the maximum amount of affordable housing to help meet the requirements of the GNLP.

### *Specific Matters*

The Policy goes on to list eight 'specific matters' that any development of the Site is expected to address. We comment on a number of these specific requirements below:

- **Station Car Park Expansion:** The 4<sup>th</sup> bullet point of the Policy suggests that any development should "...safeguard land to expand the car parking facility at the train station". No further details are provided and it is unclear if the intention of the Policy is to either i) ensure that development of the Site does not prejudice the ability of adjacent land (i.e. outside of the Site) to be used for additional car parking; or ii) if there is an expectation that land within our client's ownership should be utilised.

If the latter is intended, then we wish to **object** to that specific requirement, given that it is not necessary to achieve appropriate development of the Site. There is no specific requirement or policy justification for an expansion for the station car park onto the Site, and due to the Site's location immediately adjacent to the station, it's development would not generate a requirement for additional station car parking. Finally, such an approach would reduce the ability to deliver an appropriate quantum of residential development on the site.

If an expansion of the car park is required it would be more appropriately located on land allocated under Policy DIS 8, which adjoins Station Road. That site adjoins the main station access and would provide a more coherent form of development.

The Policy should therefore be amended to either i) remove the 4<sup>th</sup> bullet point in its entirety, or ii) amend the requirement to clarify that redevelopment of the Site should not prejudice the expansion of the station car park on adjoining land (i.e. outside the boundary of the Site).

- **Widening of Sandy Lane on Frontage:** The 5<sup>th</sup> bullet refers to the widening of Sandy Lane to a minimum of 5.5m along the 'extent of frontage'. Whilst our client has no objection to incorporating the widening of Sandy Lane into the Site as part of any future development, for the avoidance of any doubt, this should be reworded to clarify that the widening relates to the 'extent of the site frontage'.

The Policy cannot require the redevelopment of the Site to deliver widening along the entirety of Sandy Lane.

- **Provision of Footway on Site Frontage:** The 6<sup>th</sup> bullet point of the Policy refers to the provision of a 2m wide footway at the Site frontage, extending northwards to connect with Frenze Hall Lane. Whilst our client would expect the site frontage to include an appropriate footway, it is not considered that there is justification for an extension northwards to Frenze Hall Lane.

It is expected that development of the Site would include pedestrian routes to ensure links towards the Railway Station and Station Road, which in turn provide the main pedestrian routes towards existing facilities in Diss. This includes the shared pedestrian / cycle route along Victoria Road and which provides appropriate accessibility for users.



The Policy should be amended to remove reference to the extension of the footway north beyond the Site frontage.

It is also noted that the Local Plan proposes to carry forward the DIS 9 allocation, which includes delivery of improved footpath links to the town centre and railway station. It is recommended that this policy be reworded to incorporate the widening of Sandy Lane into that site in order to continue to widening of Sandy Lane north (i.e. as proposed under the 5<sup>th</sup> bullet of Policy GNLP0102) and to allow wider improvements along the road in order to link in with those proposed along the frontage of our client's Site.

The above matters will ensure that the emerging Local Plan is appropriately formulated to ensure the future development of the Site can be delivered in an appropriate manner, whilst allowing for reasonable flexibility.

### **Summary and Conclusion**

We trust that these formal representations will be afforded the appropriate weight by the LPA and assist in the formulation of the emerging Greater Norwich Local Plan.

Frontier Agriculture Ltd supports the principle of the allocation of the Site, subject to the detailed considerations as set out above. We would welcome the opportunity to discuss the contents of this letter with Officers in due course. The Response Form has also been completed and is included with this correspondence.

We would be grateful if you can keep us updated of any further stages of consultation, in order that we can provide comments as may be required.

Should you require any clarification or additional information, please do not hesitate to contact Alistair Ingram or Tim Price at these offices.

Yours faithfully

**Savills (UK) Limited**  
Planning

cc. D Alliston – Frontier Agriculture Ltd

Encs Completed Response Form