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Dear Sir or Madam

## **GREATER NORWICH LOCAL PLAN – REGULATION 19 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 19 Publication Version consultation on the draft Greater Norwich Local Plan ('**GNLP**') in relation to the Site.

This correspondence provides our client's representations to the current consultation in order to assist the preparation of the new Local Plan. It follows the submission of representations to the previous Regulation 18 Consultation in March 2020.

### **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. It also includes Class E office space.

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. 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.

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It is important that the GNLP 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 residential development in the emerging GNLP, under Site Specific Policy GNLP0102 (**'the Policy'**). This identifies the Site as being suitable for approximately 150 homes.

Our client fully **supports** the inclusion of the Site within the GNLP and the principle of its allocation for residential redevelopment. The redevelopment of the Site can help to meet strategic objectives in terms of the overall provision of new dwellings within the GNLP area as set out in Policy 1 (The Sustainable Growth Strategy) and Policy 7.2 (The Main Towns). It also reflects its sustainable location, accessibility and deliverability within the emerging Plan period.

Our client welcomes the flexibility in relation to the total number of homes that the Site could deliver, as provided by the Policy. This is reiterated at paragraph 4.23 of the Plan, which sets out an indicative capacity of approximately 150 homes, but recognises that the exact figure will be subject to detailed design and viability considerations. This position provides appropriate flexibility to ensure that the most appropriate scheme for the Site can come forward, whether this is for a higher or lower quantum of dwellings. It in turn ensures that any future scheme will make the most appropriate and efficient use of this brownfield site, taking into account design and viability.

The Policy then sets out a range of specific matters to be addressed through any future development scheme. In particular, none of these represent a constraint on the future delivery of the Site and would be addressed as part of a future planning application. This includes an assessment of contamination, noise / amenity, surface water flood risk and archaeology, and a planning application would incorporate details of appropriate mitigation in relation to these matters, where necessary.

The Policy also requires the widening of Sandy Lane and the provision of a cycle / footway, both for the extent of the site frontage. These can be achieved and the latter in particular will provide for appropriate pedestrian / cycle facilities to be provided on the frontage of the Site, which in turn will link with the wider existing network and ensure that facilities in Diss can be easily accessed.

Finally, the Policy now removes the previous requirement within the Regulation 18 Consultation undertaken in 2020, to provide a footway north to Frenze Hall Lane. Its removal is supported by our client and is entirely justified as there are existing, alternative routes that are a shorter distance and would provide appropriate pedestrian access to the key facilities in Diss. To support this position, we enclose a Pedestrian Accessibility Review prepared by Vectos transport consultants, which includes a comparison of distances and walking times of existing alternative routes, with a route via Frenze Hall Lane. This provides the appropriate evidence to support the position that such a footway would not be justified and therefore does not need to be included as part of the site specific policy in order for the plan to be found 'sound'. Any detailed highways and accessibility requirements can be addressed as part of a future planning application.

### **General Policy Matters**

Our client supports Policy 5, insofar as it relates to the provision of affordable housing. This requires provision of 33% affordable housing unless where, for brownfield sites, particular circumstances justify the need for a viability assessment at decision making stage.

This would allow for an appropriate level of affordable housing to be determined during the planning application process, subject to appropriate evidence by way of a viability assessment. This will ensure that, where viable, sites can still provide an appropriate level of affordable housing and in turn contribute to the overall delivery of new homes, which might not otherwise be the case without such an approach.



### **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 Greater Norwich Local Plan.

Frontier Agriculture Ltd supports the principle of the allocation of the Site and Policy GNL0102, as detailed above. The Representation Form has also been completed and is included with this correspondence.

We would be grateful if you can keep us updated on the progress of the Local Plan.

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 Representation Form  
Pedestrian Accessibility Review - Vectos