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PQDJ 411887



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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 adjoining Wildflower Way, Ditchingham (GNLP0343)**

Savills UK Ltd, (Rural, Energy & Projects) is instructed by our client, Ditchingham Farms, 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. Ditchingham 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 restaurant, GP Surgery, post office/ village store and a primary school. The village also benefits from regular bus services to the market towns of Bungay, Halesworth and Southwold where a considerable further range of services and facilities are available. The site is within walking distance of the village’s amenities.

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 directly 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 Wildflower Way (30mph) which could be upgraded, if required, as part of any development.

The site is immediately adjacent to Ditchingham’s settlement boundary. An existing modern residential estate is located directly to the south east and playground to the north east. Development of the site would not appear out of character with the existing built form, providing a natural extension to this residential part of the settlement.

The site is neatly bounded by extensive mature trees and hedging along its north east boundary. In a wider context that site is largely screened from the surrounding countryside and wider vistas. 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 Ditchingham, 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.

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

Available

The site is considered available for development being within the control of a single owner, who is an intrinsic part of the local area, its history and its development. 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, albeit some improvements to wider infrastructure may be required.

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 Ditchingham and would make a material contribution to the housing targets of the District.

Site Proposals Document Assessment

The site proposal document identifies land adjoining Wildflower Way, Ditchingham as GNLP0343, and in respect of its deliverability states:

“GNLP0343 (0.7ha) has a small area at risk of surface water flooding, which could be avoided. The site could impact on the setting of the conservation area, but subject to suitable boundary treatment could be suitable for housing.”

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 to the eastern corner of the site. Further investigation into site specific drainage issues would be undertaken, however there are no known reasons why surface water drainage issues could not be addressed through any development proposal.

The Ditchingham Conservation Area is located to the south of the site. It is not considered that development of the site would have a detrimental impact on, or result in any harm to the setting of the Conservation Area and appropriate landscaping could be introduced to preserve separation, if necessary. In addition, when considering the impact on heritage assets, it is considered that the public benefits associated with the development of this natural extension to Ditchingham would weigh strongly in favour of development of the site.

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

“HELAA Site Suitability Conclusion

Access would be from Wildflower Way; suitable visibility splays should be achievable and any access constraints could be overcome through development. 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 Wildflower Way which could be upgraded as part of any development, if required. The existing junction to Thwaite Road is considered sufficient with good visibility. Thwaite Road is a main road through the village and appears to have sufficient capacity to accommodate development of the site. Pedestrian footpaths are available along Wildflower Way and Thwaite Road.

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.

Surface Water Flooding

CONSTRAINTS ANALYSIS

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

Comment: Surface water drainage is addressed in our assessment of the Site Proposals Document above.

Landscape

IMPACTS ANALYSIS

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

“HELAA Site Suitability Conclusion

The site is in the Waveney Valley landscape area, and within 1km of the Broads.”

Comment: The site is located within the Waveney River Valleys, a locally significant landscape area and a short distance from the Broads. 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 north east boundary. In a wider context the site is largely screened from the surrounding countryside and wider vistas. Whilst having some intrinsic value, 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.

Biodiversity

IMPACTS ANALYSIS

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

“HELAA Site Suitability Conclusion

Broome Heath CWS/LNR is about 400m from the site, two SSSIs lie within 3km...”

Comment: In respect of any potential impact upon the SSSI and CWS/LNR. 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.

Utilities Capacity

CONSTRAINTS ANALYSIS

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

“HELAA Site Suitability Conclusion

Some improvements to the local sewerage and water supply networks may be necessary to support growth..”

Comment: It is noted that some improvements may be required to certain utility infrastructure. This is an issue reflective across the entirety of Ditchingham. It is not considered that this would prohibit new development from being delivered.

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

³ Paragraph: 109, 118

"HELAA Site Suitability Conclusion

...two Scheduled Monuments lie within 400m of the site"

Comment: As stated previously, the site is immediately adjacent to Ditchingham's settlement boundary. The main body of Ditchingham is located directly to the south east of the site, whilst there is some sporadic housing to the north. 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. It is not considered that development of the site would have a detrimental impact on, or result in any harm to the setting of the Conservation Area or Scheduled Monuments.

Conclusion

It is considered that the land adjoining Wildflower Way, Ditchingham (GNLP0343) is sustainable and deliverable as defined by the NPPF, and a suitable location for residential development. The site, within the ownership of Ditchingham Farms, 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,

Lynette Swinburne MRTPI
Associate Director, Rural Consultancy Services (RCS)

Cc: Ditchingham Farms, The Estate Office, Norwich, Norfolk, NR35 2J

Appendix 1: Site Photos



Existing field access



Existing field access



Wildflower Way



Proposed site looking north west



Wildflower Way



Proposed site looking north east



Proposed site looking north west



Existing properties adjacent the proposed site