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PQDJ/411887/LS/GW



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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 North of Old Yarmouth Road, Broome (GNLP 0346)**

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 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. Broome alongside 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. Services and facilities include a restaurant, public house, 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 plethora of services and facilities are available. The site is within walking distance of the village’s main services and facilities.

The site is designated as a local nature reserve, although appearing as cultivated arable land. There are no other 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, although it is in close proximity. The site is not subject to any PROW which may be affected by development of the site.

The site benefits from various access opportunities along Old Yarmouth Road (30mph). The section of road fronting the proposed site is inherently straight with ample visibility available.

The site is immediately adjacent to Broome’s settlement boundary. Existing residential development is located directly to the south east in a linear frontage pattern. To the south west of the site is the ‘BRO 2’ housing allocation which was granted planning permission in 2017 for 5 dwellings (Reference: 2016/2689). Visually the site appears as a continuation of the linear development along either side of Old Yarmouth Road. 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 boundaries, including a small area of woodland to the south west. The site backs onto Broome Heath County Nature Reserve. The site whilst having some intrinsic value, is not considered to make a significant contribution to the wider landscape.

The site can therefore present a suitable location for the managed growth of Broome, particularly given its relationship with the existing village and nearby housing allocation and development. 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, 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 partners as soon as possible.

### **Achievable**

As noted above, there are no known technical constraints relating to the site and therefore it is considered that it's 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 Broome and would make a material contribution to the housing targets of the District.

### **Assessment of Growth Options Document**

Appendix 3 of the Growth Options Document proposes to downgrade Broome to an 'Other Village' from its current 'Service Village' status. Our client would strongly contest the proposal to reclassify the settlement as an 'Other Village' because of the services available with Broome and its close physical relationship to Ditchingham, where there are a wider range of facilities.

### **Site Proposals Document Assessment**

The site proposal document identifies Land North of Old Yarmouth Road, Broome as GNLP 0346, and in respect of its deliverability states:

*"GNLP0346 (Old Yarmouth Road) is a site of 1.82 ha proposed for residential development and community facilities. The main constraints on development relate to its location in a landscape protection zone and the adjacent Broome Heath (a local open space and GI corridor, County Wildlife site and local nature reserve), and protected species in the vicinity."*

**Comment:** In respect of any potential impact upon Broome Heath and protected species in the vicinity. 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 suitable, biodiversity net gains would be sought in line with the NPPF<sup>3</sup>.

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<sup>3</sup> Paragraph: 109, 118

## 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

#### “HELAA Site Suitability Conclusion

*Initial highway evidence has indicated that potential access constraints could be overcome through development and any impact on the local road network could be mitigated.”*

**Comment:** The site benefits from various access opportunities along Old Yarmouth Road (30mph). The section of road fronting the proposed site is inherently straight with ample visibility available. There is adequate land within the boundary of the site to form a new access with sufficient visibility and the potential to install a footpath along Old Yarmouth Road, should this be necessary. Old Yarmouth Road is a main road through the village which appears to have 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.

### Biodiversity

#### IMPACTS ANALYSIS

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

#### “HELAA Site Suitability Conclusion

*The site falls within the Waveney Valley landscape protection zone and borders Broome Heath (an important local open space and GI corridor, County Wildlife site and local nature reserve) which may require mitigation. There are also identified protected species in the vicinity.”*

**Comment:** Biodiversity is addressed in our assessment of the Site Proposals Document above. However, to summarise, these matters 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 suitable, biodiversity net gains would be sought in line with the NPPF<sup>4</sup>.

### Open Space and Green Infrastructure & Compatibility with Neighbouring Uses

#### IMPACTS ANALYSIS

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

#### “HELAA Site Suitability Conclusion

*The site falls within the Waveney Valley landscape protection zone and borders Broome Heath (an important local open space and GI corridor, County Wildlife site and local nature reserve) which may require mitigation.”*

**Comment:** The site is neatly bounded by extensive mature trees and hedging along its boundaries which would be retained. Further landscaping could be implemented as part of any development of the site so as to reduce any potential impact of the Heath and GI corridor. The site itself is in private ownership and as such would not result in a material loss of space available for public use. At present the site forms cultivated arable land.

Existing residential development is located directly to the south east in a linear frontage pattern. To the south west of the site is the ‘BRO 2’ housing allocation which was granted permission in 2017 for five dwellings. The use of the site for housing would reflect the linear pattern of development on either side of Old Yarmouth Road and it would not appear out of character with the existing built form. In a wider context that site is largely screened from the surrounding countryside and wider vistas.

### Utilities Capacity

#### 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

#### “HELAA Site Suitability Conclusion

*Sewerage infrastructure and waste water capacity upgrades may be required to serve proposed growth in this location.”*

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

<sup>4</sup> Paragraph: 109, 118

## **Conclusion**

It is considered that the land North of Old Yarmouth Road, Broome (GNLP 0346) 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 2JU

## Appendix 1: Site Photos



Existing field access



Proposed site towards Old Yarmouth Rd



Old Yarmouth Rd



Proposed site looking south west across site



Proposed site looking east across site



Proposed site looking east across site



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Old Yarmouth Rd



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Western site boundary towards Old Yarmouth Rd



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Proposed site looking north east



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Looking north east out of site