

21st March 2018
PQDJ 413252



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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 south of Old Yarmouth Road Kirby Cane (GNLP 0348)**

Savills UK Ltd, (Rural, Energy & Projects) is instructed by our client, J Fenwick Esq, 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. Kirby Cane, alongside Ellingham, 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 and a primary school which are within walking distance of the site. The village also benefits from regular bus services to the market towns of Beccles and Southwold where there are greater range of amenities 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. Nor does it directly impact upon any designated heritage assets³. 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. The section of road fronting the proposed site is inherently straight with ample visibility available. If required, it may be possible to bring the site within the 30mph limit.

The site is immediately adjacent to Kirby Cane’s settlement boundary. An existing residential estate is located directly to the west and there is also residential development to the 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 fronts onto an area of mature woodland to the north. It is open to the east and south east. Whilst having some intrinsic value, it is considered that it does not make a significant contribution to the wider landscape character, being well-related to the existing built form of the village and existing residential properties.

The site could therefore present a suitable location for the managed growth of Kirby Cane, particularly given its relationship with the existing village. It is considered to be of an appropriate scale in relation the size of the village, and as such, it 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

³ As identified on the National Heritage List for England (NHLE), March 2018

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. It is noted that some improvements may be required to certain utility infrastructure.

There are no other known 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 Kirby Cane 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 south of Old Yarmouth Road Kirby Cane as GNLP 0348, and in respect of its deliverability states:

“To the east of Kirby Cane sites 0348 and 0396 are located adjacent to the built up area within the Waveney Valley, and are all affected by a low chance of surface water flooding.”

Comment: Environment Agency surface water flood mapping indicates that a section of the site is susceptible to surface water flooding. 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.

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	Green
Utilities Capacity	Amber	Biodiversity and Geodiversity	Amber
Utilities Infrastructure	Green	Historic Environment	Amber
Contamination and Ground Stability	Green	Open Space and GI	Green
Flood Risk	Green	Transport and Roads	Amber
Market Attractiveness	Green	Compatibility with Neighbouring Uses	Green

“HELAA Site Suitability Conclusion

Initial highway evidence has indicated that there are potential access constraints on the site, but these could be overcome through development. Also, subject to suitable footpath provision, any potential impact on the functioning of local roads could be reasonably mitigated.”

Comment: The site benefits from various access opportunities along Old Yarmouth Road. The section of road fronting the proposed site is straight with ample visibility available. There is adequate land within the boundary

of the site to form a new access with sufficient visibility, should this be required. 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 are severe . A transport assessment would be produced, if required, by a qualified Highways Engineer prior to submission of any planning application.

Landscape

IMPACTS ANALYSIS

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

“HELAA Site Suitability Conclusion

However, other constraints include landscape sensitivities as within the River Valley, Broads Authority buffer...”

Comment: The site is located within the Waveney River Valleys, a locally significant landscape area and the Broads Authority buffer. 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. 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	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Amber
Compatibility with Neighbouring Uses	Green

“HELAA Site Suitability Conclusion

There are no concerns over... ecology... However, other constraints include... SSSI Leeth Hill to the east”

Comment: In respect of any potential impact upon the SSSI. 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 NPPF⁴.

⁴ Paragraph: 109, 118

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

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

Historic Environment

IMPACTS ANALYSIS

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

“HELAA Site Suitability Conclusion

However, other constraints include... proximity to listed building to the south.”

Comment: There are no listed buildings within 100m 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 any designated heritage assets. Archaeological works, if required, could be conditioned or undertaken as part of any future planning application should the site be allocated for housing.

Conclusion

It is considered that the land to the south of Old Yarmouth Road Kirby Cane (GNLP 0348) is sustainable and deliverable as defined by the NPPF, and a suitable location for residential development. The site, within the ownership of J Fenwick Esq, 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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