

16 March 2020
Reps to Reg 18 GNLP - GNLP0391 Framingham Earl



Greater Norwich Local Plan Team

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Dear Sirs,

REPRESENTATIONS TO GREATER NORWICH LOCAL PLAN

STAGE C REGULATION 18 DRAFT STRATEGY AND SITE ALLOCATIONS

GNLP0391 – LAND AT FRAMINGHAM EARL

Savills (UK) Ltd are instructed on behalf of the Diocese of Norwich to submit representations in support of the sites identified as 'GNLP0391-A' and 'GNLP0391-B' within the emerging Greater Norwich Local Plan (GNLP). GNLP0391 was first submitted through the GNLP call for sites exercise in July 2016.

This covering letter comprises our representations to the current consultation.

We have reviewed the assessment of the sites provided within the GNLP Sites Document, and make the following comments in relation to their delivery.

Comments on GNLP0391 – Land at Framingham Earl

Context

It is first pertinent to review the sites within the context of the village's position in the proposed settlement hierarchy and the distribution of growth.

The sites are located within Framingham Earl, defined by the emerging Greater Norwich Local Plan as a 'key service centre' alongside Poringland and Framingham Pigot. Framingham Earl is within the administrative boundary of South Norfolk District Council.

In describing Framingham Earl, the emerging GNLP Sites Document states:

"Poringland/Framingham Earl is identified as a key service centre in the GNLP. The village has a range of services including a post office, supermarket, other stores, pubs, restaurants/take-aways, two doctors' surgeries, a dentist, a primary school, a high school, two community halls, as well as recreation facilities at the High School and some local employment. The settlement is well connected to Norwich by bus.

A substantial amount of land continues to be promoted for development in Poringland/Framingham Earl (including land in adjacent parishes of Bixley, Caistor St Edmund, Framingham Pigot, Framingham Earl, and Stoke Holy Cross). Issues to take into account when assessing the potential for future development include the rural nature of large parts of the parishes, with the distinctive setting created



by areas of heavily wooded former parkland. The 2012 South Norfolk Place Making Guide suggests that development should not further accentuate the linear settlement pattern. The settlement has a history of surface water and ground water drainage difficulties, and the most vulnerable sites were identified in an Urban Drainage Study. This issue will be a consideration for many sites in Poringland and Framingham Earl, and mitigation will be needed for any development on such sites. A Neighbourhood Plan is currently being prepared for Poringland parish and is at an advanced stage.

There are currently no new allocations proposed and no allocations to be carried forward in this key service centre. There are however 536 dwellings with planning permission on small sites.

All new and carried forward allocations are expected to address standard requirements associated with development. These vary from place to place but are likely to include mitigations for flood risk (as well as SUDs), highways improvements, safeguarding of minerals resources, land remediation, measures to protect the environment, biodiversity, and landscape intrusion.”

The GNLP Sites Document in its assessment sets out that no new allocations are proposed within this key service centre. Our client accepts the Council’s assessment and does not wish to dispute the growth strategy. As such this representation seeks only to highlight that sites ‘GNLP0391-A’ and ‘GNLP0391-B’ are suitable, available and achievable for development purposes in accordance with the tests set out within the NPPG¹. With respect to ‘GNLP0391-B’ it is considered that all or part of the site could come forward. The sites offer additional land for housing in this sustainable settlement should any of the consented schemes be delayed or not be implemented, or in the event that further sites are required in the later stages of the plan period.

Suitable

Accessibility to Services

Encouraging growth in sustainable settlements within rural areas is in accordance with 2019 NPPF and is considered vital to the long term sustainability of rural communities (NPPF para 78).

Framingham Earl is identified as a ‘key service centre’ in the Strategy Document. Key service centres are identified by the GNLP at paragraph 333 as having ‘*a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas*’. As noted above, Framingham Earl is well served by services and facilities. These are within easy walking/cycling distance of the site.

Framingham Earl is also well related to Norwich (within 7.5 miles) where a number of facilities and services exist including leisure and employment. There are three bus routes serving Framingham Earl including the 40, 40A and 41A which provide a regular bus services to Norwich.

Townscapes

The site is well related to the proposed settlement boundary and as such has a good relationship with the village’s existing built form.

Transport and Roads, and Landscapes

Access to the sites would be sought via Burgate Lane and Hall Lane (30 mph), both of which could be upgraded to accommodate any development.

GNLP0391-A is neatly bounded by extensive mature trees and hedging along its boundaries which largely screen the site from the surrounding countryside. Whilst having some intrinsic value, due to the site’s largely enclosed nature, it is considered that it does not make a significant contribution to the wider landscape

¹ Paragraph: 019 Reference ID: 3-019-20140306; Paragraph: 020 Reference ID: 3-020-20140306; and Paragraph: 021 Reference ID: 3-021-20140306

character. GNLP0391-B is visually more open, however when considered in the context of Framingham Earl's built edge, it is not considered its development would significantly impact the landscape character.

In considering the associated landscape and highways impact of GNLP0391-B, it is noted that there is an application pending for 98 dwellings including 5 live/ work units (LPA Ref: 2019/1593) to the immediate south of this site. If permitted this application would materially alter the settlement's existing built form whilst upgrading Burgate Lane.

Other Comments

There are few physical limitations or constraints which would make development of the sites difficult or unacceptable. The sites are not located within Flood Zones 2 and 3 and are not subject to any PROW which may affect development of the site.

Available

The sites are considered available for development being within the control of a single owner. Should the sites be identified as a suitable residential allocation, Savills would be able to act on our client's behalf with a view to identifying suitable development partners as soon as possible.

Achievable

As noted above, there are no known major 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 available.

There are no other known factors that mean development of the site would be difficult or unachievable. Therefore, it is clear that this site presents a deliverable option for housing and could make a material contribution to the housing targets of the district.

Conclusions

It is considered that the sites 'GNLP0391-A' and 'GNLP0391-B' are sustainable and deliverable as defined by the NPPF, and suitable locations for residential development. The sites, within the ownership of the Diocese of Norwich, represent an attractive option for housing growth within the District.

I would be grateful if you could keep me updated in relation to the next stage of the Local Plan process and, reserve the right to appear at the Examination sessions, if required, when they take place.

Please do not hesitate to contact me should you require any further information.

Yours faithfully,

Gareth Watts MRTPI
Planner