

Representations to the Frisby on the Wreake
Neighbourhood Plan consultation

Regulation 16 draft, dated 17th May 2017

On behalf of Richborough Estates

July 2017



1.0 Introduction

- 1.1 We are pleased to submit representations, on behalf of Richborough Estates, to the draft Frisby on the Wreake Neighbourhood Plan consultation (dated 17th May 2017) (“the draft NP”). Richborough Estates have an interest in land off Great Lane in Frisby on the Wreake, which combined has been identified as housing allocations FRIS 1 and FRIS 1a in the draft NP.
- 1.2 Richborough submitted representations to the previous NP consultation (Regulation 14) and the changes made to this version of the Plan are extremely welcome and address the concerns previously expressed.
- 1.3 Our representations therefore focus on the following policies in the draft NP, which were commented on previously and our view on each of the policies as currently drafted is hereby provided:
- Policy H1: Housing Provision
 - Policy H2: Housing Allocations
 - Policy ENV9: Areas of Separation
 - Appendix A: Guidelines for Building Design
- 1.4 We trust our representations will be taken into account during the next stage of the plan preparation.

2.0 Response to Individual Policies contained within the Draft NP

Policy H1: Housing Provision

- 2.1 Richborough Estates welcomes the draft Neighbourhood Plan's recognition of the need for additional housing growth in Frisby on the Wreake and the work that has been undertaken to seek to identify the most appropriate and sustainable way to accommodate future development through the draft NP.
- 2.2 Policy H1 identifies a target of 78 new dwellings in Frisby over the period 2017 and 2036 and Richborough Estates welcome the identification of this housing target within the NP.

Policy H2: Housing Allocations

- 2.3 Richborough Estates support the proposed allocations of land off Great Lane (FRIS 1 and FRIS 1b) for new housing. With reference to footnote 11 to paragraph 49 of the NPPF, Richborough can confirm the wider site represents a suitable, available achievable and deliverable housing site.
- 2.4 Housing Allocation FRIS 1 benefits from outline planning permission for residential development (ref: 16/00491/OUT). It should be noted that the consent does not automatically restrict the number of dwellings to be delivered within the first phase to 48 and so a degree of flexibility will need to exist to deliver the minimum 78 dwellings across both phases. Richborough are satisfied that the working of Policy H2 allows for the required flexibility and this will help to ensure that the most appropriate masterplanning response can be achieved for the whole site rather than considering each parcel in isolation.
- 2.5 In support of their inclusion as Housing Allocations under Policy H2, FRIS 1 and FRIS 1A can be considered deliverable with regard to the following tests in footnote 11 of the Framework:

Availability – Richborough Estates have an agreement with the land owners who support the promotion of the whole site for residential development. As such, there are no legal or ownership constraints to developing the site and it can be confirmed as available.

Suitability – The suitability of FRIS 1 for housing has been robustly tested and is demonstrated through the granting of outline planning permission. Richborough Estates have also commissioned technical surveys and assessments relating to FRIS 1A which also confirm that there are no technical or physical constraints which would prevent the wider site coming forward for residential development.

Achievability – An assessment of the technical constraints and necessary mitigation measures that would be required to deliver both FRIS 1 and FRIS 1A have confirmed there is nothing that would physically, environmentally, socially or legally constrain the development of the wider site.



The enclosed Illustrative Masterplan (Appendix 1) demonstrates that the combined site, FRIS 1 and FRIS 1A, is capable of delivering the whole of the currently identified housing requirement for Frisby on the Wreake (78 dwellings) in a manner appropriate to the overall character of the village.

2.6 There are several material advantages to delivering the entire housing requirement across the two proposed Housing Allocations on Great Lane:

- The deliverability of FRIS 1 has been demonstrated beyond any doubt through the application process so the local community can have confidence the site will come forward for development;
- The allocation of the wider site to meet the whole housing target will reduce the risks that the draft NP will fail to deliver the housing requirement to be established within the emerging Local Plan. It would therefore ensure that the NP can be used as a robust basis to defend Frisby against further speculative applications on land outside of the defined settlement boundary;
- Allocating FRIS 1A in addition to FRIS 1, where development is already set to come forward, would direct the housing requirement for Frisby to a location that would have the least impact upon existing residents and the character of the existing settlement;
- The allocation of FRIS 1 and FRIS 1A will allow for greater flexibility in design of the development. It would provide scope for more high quality landscaping and open space to be introduced; and
- Any disturbance caused through the construction process (i.e. through construction traffic or noise pollution) would be concentrated in one area of the village, thereby minimising disruption to village residents.

2.7 Policy H2 is therefore fully supported by Richborough in its current form.

Policy ENV9: Areas of Separation

2.8 Richborough Estates previously raised serious concerns that the proposed 'Area of Separation' under Policy ENV9 was not justified with regard to appropriate evidence and does not conform with the strategic policies in the emerging Melton Local Plan.

2.9 It is noted that the current Draft NP has revised the extent of the Area of Separation and this is considered to be a much more logical approach to take and represents a functional policy response that is focussed upon the area most sensitive to encroachment and the potential merging of settlements.

2.10 Richborough therefore support the revisions made to Policy ENV 9.

Appendix A: Guidelines for Building Design

- 2.11 Overall, Appendix A re-iterates best practice advice in relation to the design of new development and provides a useful analysis of local character and architectural features.
- 2.12 Richborough note the amendment that has been made under the sub-heading 'Local Factors', which responds positively to our comments submitted to the Regulation 14 consultation. It is recognised that the recommend buffer zone of 50 to 100 metres between new development and adjacent housing has now been amended to 20 to 30 metres. This is considered to be an appropriate measure that will ensure that the amenity of existing and new residents is protected, without compromising the ability of sites to deliver housing at an appropriate density that makes the most efficient use of land.



3.0 Conclusion

- 3.1 Richborough Estates welcome the changes that have been incorporated into the Regulation 16 consultation version of the Frisby Neighbourhood Plan and fully support the Plan in its current form.

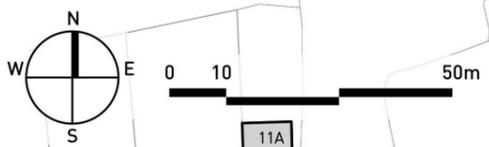


Appendix 1

Land off Great Lane – Proposed Phases 1 and 2

Illustrative Masterplan





KEY

- PHASE 1 SITE LOCATION
- PHASE 2 & LAND WITHIN APPLICANTS CONTROL
- PROPOSED RESIDENTIAL DEVELOPMENT
- EXISTING LANDSCAPE
- PUBLIC OPEN SPACE
- SUSTAINABLE URBAN DRAINAGE

PHASES 1 & 2 QUANTUM: UP TO MAXIMUM OF 79 DWELINGS



KEY PRINCIPLES

1. PRINCIPAL STREET AND ACCESS VIA GREAT LANE;
2. RESIDENTIAL BUILDING LINE EXTENDING EXISTING STREETScape;
3. SOFT DEVELOPMENT EDGE;
4. FOCAL POINT BUILDINGS AND KEY SPACE;
5. BUNGALOWS;
6. 1.5 STOREY COTTAGES;
7. EXTENDED BUILDING SEPARATION DISTANCES;
8. PROPOSED PUMPING STATION;
9. GREEN EDGE;
10. EXISTING FIELD EDGE;
11. VIEW TO ST. PETERS CHURCH IN KIRBY BELLARS;
12. SHARED SURFACE STREET; AND
13. PROPOSED ELECTRICITY SUB-STATION.
14. EXISTING PONDS RETAINED.
15. POTENTIAL NEW PLAY SPACE.

PHASE ONE
48 TO 54 DWELLINGS.
DEPENDENT ON HOUSING MIX.

PHASE TWO
25 TO 30 DWELLINGS.
DEPENDENT ON HOUSING MIX.

LAND OFF GREAT LANE, FRISBY ON THE WREAKE - PROPOSED INDICATIVE MASTERPLAN (PHASES 1 & 2)



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