

30.07.2021

South Norfolk Council
Cygnet Court
Long Stratton
Norwich
NR15 2XE

To whom it may concern,

RE: Site SN0535 – Response to consultation question 158

We are writing in response to the ‘South Norfolk Village Clusters Housing Allocations Plan (Reg. 18 Draft)’, hereafter referred to as ‘The Plan’. Specifically, we are responding (in our capacity as Agents for the landowner) to the rejection of site reference SN0535 for allocation.

In commentary provided in the consultation, the reason for rejecting the proposed allocation is described as,

“Although the site could be reduced in size to meet the aspirations of the VCHAP it is considered to be unreasonable as an allocation as significant access constraints preclude development of the site. Access would need to be obtained via a narrow access driveway between two dwellings.”

In this response, we will discuss the objectives of The Plan and the role that site SN0535 can play in helping the Council to meet these objectives. However, given the specific nature of the reason for rejecting the site for allocation, we will first seek to address this directly.

The primary consideration to be addressed is therefore the question of access. In response to this, we attach an ‘Access Feasibility Appraisal’ prepared by Pell Frischmann.

We would strongly disagree with the description within the consultation of a 'narrow access driveway', as the access in question is approximately 6m wide. The design guidance contained in the 'Manual for streets' identifies that a carriageway width of 4.1m is required to enable 2 cars to pass one another, rising to 4.8m to enable a car and HGV to pass. The access is therefore not only wide enough to safely accommodate vehicular traffic but could also facilitate an adjacent footway. For perspective, High Street in Wicklewood is 5.5m wide on average.

We do acknowledge that the access junction into the wider site would be framed by dwellings. However, this is not uncommon; either in Wicklewood, or in the wider context of common cul-de-sac or residential community design. The proposed allocation would not facilitate any new throughway beyond the extent of the development itself, and the number of dwellings proposed for allocation is modest. The volume of traffic utilising this junction would therefore be negligible in terms of Transport Assessment and junction capacity. We would also note that the 6m wide site access would not require a reduction in the existing curtilage of those properties adjacent to the access, nor would it reduce parking provision for these properties.

The appraisal prepared by Pell Frischmann discusses this matter in greater detail (including issues such as bell mouth design, vision splays, highways safety etc.), but we do not believe that the description of a 'significant access constraint' is characteristically accurate, and we would ask the Council to review their findings in light of this evidence.

Beyond the question of access, we believe that the site provides a unique opportunity for diversifying the provision of housing in Wicklewood.

If we review preferred allocations SN0577REVA and SN4045SL, there is commonality in the proposed density of approximately 25 dwellings per hectare. Looking at the most densely developed area of central Wicklewood (the area around the intersections between High Street, Low Street, Church Lane, and Hillside Crescent), existing housing density is approximately 15 dwellings per hectare. The current preferred allocation sites would therefore represent the most densely developed areas of Wicklewood. This significantly restricts their capacity to create development in a form which is consistent with the existing settlement.

The proposed allocation site SN0535 occupies approximately 1.9 hectares, but we do not believe that it would be appropriate to propose a level of density commensurate with the preferred allocations (which would equate to 47 dwellings). Rather, we see the proposed allocation site as an opportunity to offer a lower density addition to the preferred allocations in Wicklewood, diversifying the characteristics of new development brought forward under the Village Cluster initiative.

At this incipient stage of the process, we have based our review on a proposal for an allocation of approximately 12-15 dwellings, although the Council may see an opportunity for additional windfall beyond this proposal, and the site is certainly flexible enough to support a larger allocation. Based on average housing density in the existing settlement, the site could potentially provide 28 dwellings in a form representative of the existing settlement character. However, as the site would represent 'infilling', we feel that it is appropriate to ensure that a sufficient buffer could be retained on the site boundaries to ensure that the amenity of neighbouring sites is preserved, and as such, a lower density is considered appropriate at this stage.

In relation to the size of the proposed allocation site, and the premise that the provision of 12-15 dwellings is appropriate, this would allow for a housing density as generous as 6.2 per hectare. Not only would this present an attractive opportunity for characteristically different design to the existing, preferred allocation sites, but it would ensure that the site could make provision for significant landscape, amenity, and biodiversity gains, whilst maintaining a form of development consistent with existing areas of development on Low Street, High Street, Hackford Road and Church Lane, where existing housing density is analogous.

The scope of the site would also facilitate the potential delivery of a number of affordable homes with only a negligible increase in overall density. Alternatively (or additionally) the site would also be sufficient to accommodate plots set aside for 'self-build', an objective that has proven consistently difficult to deliver in plans Nationally. The low-density nature of the allocation would provide ideal circumstances for self-build provision, with street scene constraints far less acute. We would envisage that any provision for affordable housing or self-build plots is made in addition to the baseline 12-15 dwellings.

This lower density and potential for significant landscaping would also ensure that site design can preserve the amenity of existing dwellings on the western and southwestern site boundaries, as well as serving to insulate the site from more industrial aspects to the northeast.

The proposed development site represents an excellent opportunity for 'infilling', whereby the provision of new housing would not require any expansion to the settlement boundary but would rather facilitate development on underutilised land within the existing settlement, helping to preserve the form of the settlement and the overall quantum of the village. The proposed development site is free from any constraints which would preclude development, and as the site is being promoted by the owner, there are no legal or contractual barriers to development, thus demonstrating the highest level of 'deliverable and developable'.

Whilst the primary purpose of The Plan is meeting housing need, The Plan commendably sets out to provide a mix of house types, sizes and tenures whilst also ensuring that the form and character of existing villages are preserved, and appropriate landscaping measures are delivered as part of new development.

We support the preferred allocation sites (SN0577REVA and SN4045SL) in terms of striving towards housing need targets, but it is true to say that these sites are constrained in size, and at the density proposed within The Plan, limited opportunity exists to imitate the settlement's existing form and character, and to create the type of diversity that the objectives of The Plan promote.

Site SN0535 would not simply be an additional allocation, indistinguishable from the existing preferred allocation sites, but would rather represent an opportunity to provide exactly the type of diversity promoted by the objectives of The Plan (including the prospect of self-build opportunities, historically one of the most difficult objectives to deliver), in addition to representing a significant opportunity for net landscape and biodiversity gains without requiring any further alteration to the Wicklewood settlement boundary.

Considering the potential benefits of such an allocation, the narrow reason presented for rejecting the site for earlier allocation and the evidence presented alongside this response which successfully resolves this concern, we would ask the Council to reconsider site SN0535 for allocation.

Should you have any queries then please do not hesitate to contact me.

Yours Sincerely

Michael Graham . Director