

2 August 2020

South Norfolk District Council  
Submitted electronically via consultation portal

Dear Sirs

## **South Norfolk Village Clusters Housing Allocations Regulation 18 Consultation – SN0204 Bobbins Way, Swardeston**

### **Background**

These representations are submitted on behalf of Bennett Homes to the South Norfolk Village Clusters Housing Allocations Plan Regulation 18 ('the draft plan') consultation process.

These representations relate to SN0204 Bobbins Way, Swardeston which is being promoted for residential allocation by Bennett Homes. The site plan is contained at **Appendix 1**

SN0204 Bobbins Way, Swardeston

Bennett Homes support the allocation of site SN0204 (1.6ha) for residential development. As set out in our previous representations, this brownfield site is a sustainable location for new housing development. We have set out below comments on points of detail.

### **Housing Numbers**

The Introductory Chapter to the South Norfolk Village Clusters Housing Allocation Plan states that "The main aim of the Plan is to allocate a series of smaller sites, typically within the range of 12 to 50 homes, across the 48 Village Clusters in South Norfolk, to accommodate at least 1,200 new homes in total."

The site at Bobbins Lane, Swardeston is identified as a preferred allocation for up to 25 dwellings on a site of 1.6 ha. This would provide a density of 15.6 dwellings per hectare. Given the favourable location of this site and the lack of site constraints (see below for further information) this site could be developed at a density of 25 dwellings per hectare and provide for 40 dwellings. This would make efficient use of the land and help contribute towards the plan requirement to provide at least 1200 new homes in total. Bennett Homes therefore request that the policy wording be amended to allow for the provision of 40 dwellings.

### **Flood Risk and Landscape Impacts**

It is noted that the reasoned justification for the allocation states:

"Development would continue to have some adverse landscape impacts, due to identified flood risk constraints being likely to restrict development on those parts of the site closest to the existing settlement. This would result in a suboptimal relationship between new development and the main village. It would need to be demonstrated that a form of development could be achieved which relates suitably to the existing village."

We do not agree with this assessment and have provided Environment Agency Map extracts to demonstrate there are no flood constraints (**Appendix 2**). The site is in flood zone 1 in an area with a low probability of flooding from rivers or the sea. Environment Agency mapping also demonstrates that the site is not at risk from surface water flooding. There are, therefore, no flood constraints that would restrict development on any part of the site.

The South Norfolk Site Assessment booklet for Swardeston supports these findings. It states that “the reduced site is within flood zone 1 with no identified surface water flood risk”.

In terms of landscape impact, the South Norfolk Senior Heritage and Design Officer assessment concludes; “no objection on heritage or design grounds and would be a good use of rural brownfield land. Landscaping on field edge to east should be preserved/retained.”

The reasoned justification for the allocation therefore needs to be amended to properly reflect the lack of any flood risk and related landscape constraints. The overall conclusion for the site contained in the Site assessment booklet should also be amended accordingly.

## Highways Impact

The SNC Site Assessment notes that the Highway Authority accepts that in terms of the site access, consideration should be given to the brownfield nature of the site and the existing traffic levels generated by the former farmshop. Furthermore, the current access is being widened to 4.8m for the adjoining development and will have a purpose designed junction to the B1113. Access to the site is therefore deemed suitable by the Highway Authority.

The Highway Authority mentions the lack of pedestrian access to Mulbarton Primary School. However, the SNC Site Assessment (page 20) notes that there is a continuous pedestrian link from the site to the Primary School, although it is narrow in places. This was considered adequate to cater for the 38 dwellings approved on the adjacent site under 2014/1642 and 2017/2247 and should, therefore, be suitable to accommodate an allocation for additional dwellings on SNC0204 as well.

If improvements to footways are considered by the Highway Authority to be necessary to serve the development, they should be proportionate to the scale of development proposed and the increased risk to pedestrians over and above the committed development on the neighbouring site.

If deemed necessary, Bennett Homes are confident that a suitable solution exists. Depending upon the scale of improvement scheme sought by the Highway Authority, Bennett Homes are pleased to note that the reasoned justification to the policy accepts:

“In order to mitigate highways concerns a development of more than 25 homes may be required. Should this be the case careful consideration would need to be given to mitigating landscape impact.”

The chosen preferred allocation site is 1.6ha in size and could accommodate up to 40 dwellings instead of the 25 specified in the draft policy. Adjacent land under the control of Bennett Homes is also available for additional housing and associated landscape mitigation, if necessary.

## Conclusion

Bennett Homes support the allocation of site SN0204. The 1.6ha site would be capable of accommodating more than 25 dwellings and up to 40 dwellings at a density of 25dph. The policy should be worded accordingly. The SNC site assessment and reasoned justification for the allocation is inaccurate with regard to identified flood risk and landscape concerns and this should be corrected. Further justification for any footway improvements from the site to Mulbarton Primary School should be provided. If required, the works should be proportionate to the scale of the proposal. Adjacent land under the control of Bennett Homes is available for additional housing and associated landscape mitigation if necessary.

I trust that the above and enclosed is of assistance to you and your colleagues in concluding the suitability and deliverability of the proposed allocation site.

Yours faithfully



**Beccy Rejzek**  
Associate Director, MRTPI,

**Appendix 1 – Site Plan**

**Appendix 2 – Environment Agency Map Extracts**