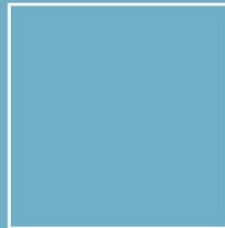
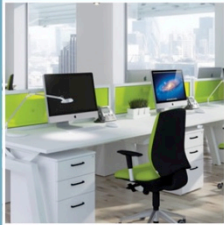


South Norfolk Council
Village Clusters Housing Allocations Plan:
Regulation 18 Public Consultation

Site: SN0078 –
Land off Loddon Road, Ditchingham

Planning Representation

July 2021



Issue Sheet

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Land off Loddon Road, Ditchingham

Planning Representation

July 2021

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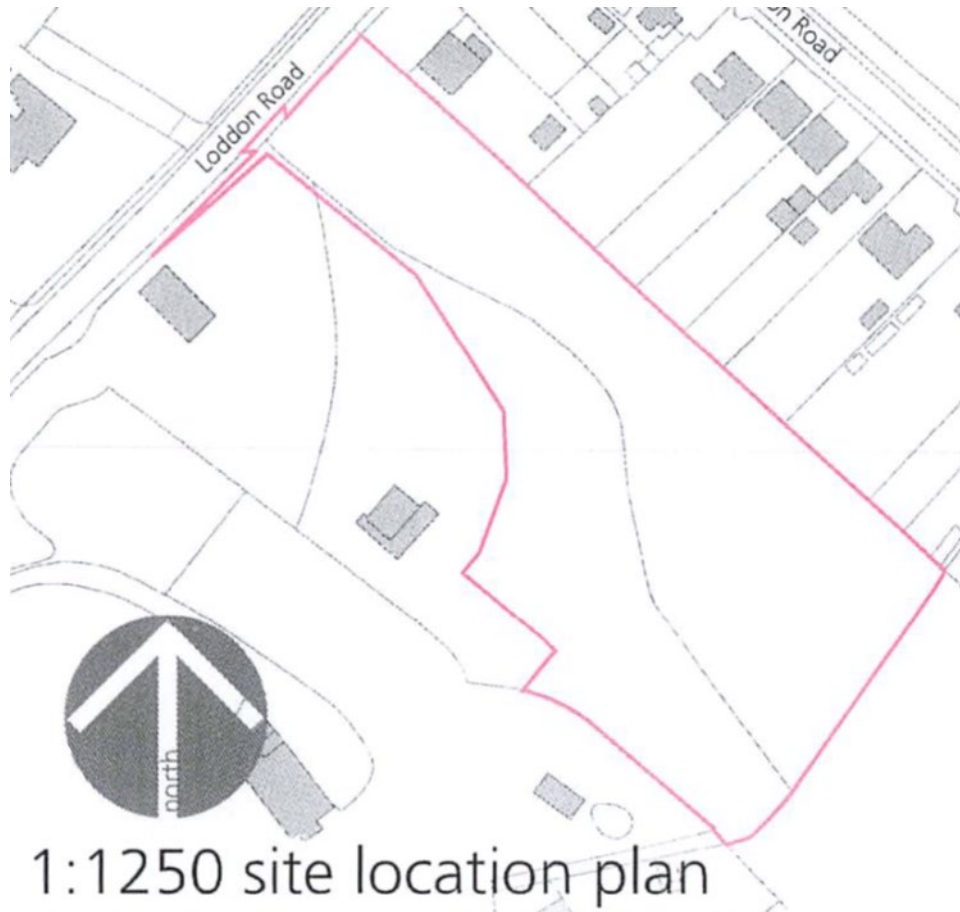
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Appendix 1 - Site Pictures

1 Introduction

1.1 Instruction

- 1.1.1 This representation is submitted on behalf of the landowners and in response to the Greater Norwich Local Plan (GNLP) Regulation 18 Public Consultation.
- 1.1.2 The landowners have requested that Lanpro promote their site in this consultation process and all communication on this site should be directed to Lanpro.
- 1.1.3 The site is outlined in red below:



1.2 Background

- 1.2.1 The 'South Norfolk Village Clusters Housing Allocation Plan' (VCHAP) has now been published for public consultation. The landowners wish for their site to be considered in that site allocation process.
- 1.2.2 They have noted that the site appears to have been identified and considered by the Council in the initial sifting of sites. The landowners can confirm that they have not previously promoted the site.
- 1.2.3 Ditchingham has been grouped together with the settlement/parishes of Broome, Hedenham and Thwaite.
- 1.2.4 The Clusters plan advises:

The village has developed a nucleated settlement form largely as a result of substantial post-war development. The majority of this growth has taken the form of estate development between Thwaite Road and Loddon Road. An area of 1950s Tayler and Green housing at Windmill Green and Scudamore Place makes a significant contribution to the character of the village and is now a Conservation Area.

The A143 runs across the south of the parish linking with Beccles and the A146 to the east and Harleston, the A140 and Diss to the west. The B1332 provides a link to Norwich, whilst local road and pedestrian facilities provide easy access to Bungay.

- 1.2.5 The VCHAP identifies two preferred sites in Ditchingham, these would deliver circa 45 dwellings. However, specific numbers have not been established.

2 The Proposed Development

2.1 Site Context

- 2.1.1 The site subject to this statement is located to the east of Loddon Road and has direct access onto the road. It has on its boundaries commercial and residential development, The residential development ranges from medium density on the Station Road side to low density on the southern element of the site.
- 2.1.2 The site is relatively open in character, its previous use was as a commercial Christmas Tree growing operation which has long since ceased. There are mature trees on site but these are predominantly on the boundaries.
- 2.1.3 The site is well located for the services and facilities on offer in the village and is clearly within the central grouping described by the Council in their summary of the settlement. Rather than on the edge of the settlement and encroaching into the open countryside.
- 2.1.4 The site is approximately 0.73 ha and contains no structures.

2.2 Proposal

- 2.2.1 The landowners propose that the site be allocated for residential development and that the yield could be up to 15 dwellings.



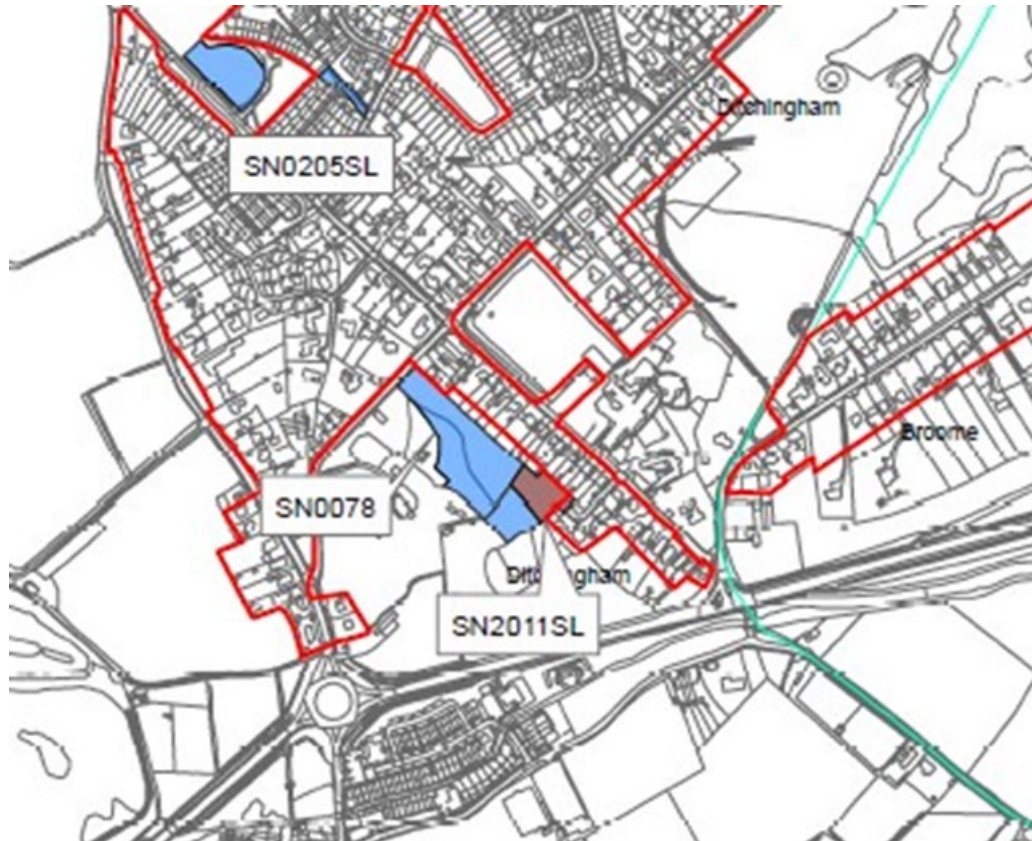
- 2.2.2 The landowners would also suggest that this site could come forward with immediate effect and be on offer for early delivery within the plan period. The site would deliver the policy compliant levels of affordable housing and open space.
- 2.2.3 We would propose that the site development would retain the boundary vegetation and, if required, there would be sufficient space to carry out any compensatory planting.

2.3 GNLP considerations

2.3.1 The site has been identified as SN0078 Land off Loddon Road, Ditchingham. The assessment of the site states:

The development of the site would require the removal of a number of trees. Development would impact upon the landscape. Furthermore, the site is in multiple ownership and it is unclear if all the site owners support development.

2.3.2 The site is shown labelled as SN0078 and in blue.



2.3.3 Please note the site promoted does not include the area in blue immediately to the west of the brown allocation land.

2.4 Available

2.4.1 I can confirm that we are instructed by the landowners to promote this site. All of the landowners are keen to see this site come forward and developed. Previous agreements had been made with a developer but that partnership failed due to the developers position, not the landowners.

2.4.2 We have several SME housebuilders who are engaging with the landowners and we are confident that a deal to develop the site can be achieved in the short term.

2.5 Deliverable / Viable

2.5.1 There are no known constraints to delivering this land, there are no contamination issues or infrastructure matters which would make it unviable. The site benefits from mature trees but many of which need to be managed/removed and the development of the site would provide the impetus to undertake that work.

2.5.2 The development would not in our opinion result in a large loss of vegetation.

2.5.3 We don't consider that there would be any significant landscape impact. The site is not considered to be an important gap between built up frontage and offers no wider

landscape views. The landscape impacts would be less than those sites which have been identified as suitable development options.

3 Preferred Alternatives

3.1 Site: SN0373, Land between Thwaite Road and Tunneys Lane

3.1.1 The Council assessment of this site states:

Preferred for up to 35 dwellings on a site of 1.4 hectares.

Reasoned justification: The site as promoted is significantly larger than the preferred site and could potentially accommodate more than 35 dwellings if necessary. The site is well related to the existing services and facilities within Ditchingham. No additional constraints have been identified which would affect its delivery. Although, the development of the site is subject to suitable access via the current DIT1 allocation (which has yet to be started) and Waveney Road, and this may limit the total capacity for the site to expand. The preferred site at approx. 1.4ha reflects the aspirations for the plan and would be located to the south east of the site.

3.1.2 The site is reliant on the allocation DIT1 being delivered first, this has yet to commence development. The developer of DIT1 is also the promoter of SN0373. The allocation of this site would lead to the same developer having control over the supply of homes in Ditchingham to suit their own sales absorption rate, therefore both controlling supply and pricing/competition. This is an unhealthy situation which does not guarantee delivery of homes to meet demand. The fact that the original site has still not been built out despite being allocated for a number of years is also detrimental to confidence in the remainder of the site being brought forward.

3.1.3 The site also results in significant intrusion into the open countryside, which would undoubtedly create landscape harm; beyond what would be experienced by the development of SN0078.

3.2 Site: SN2011SL, Land off Lamberts Way, Ditchingham

3.2.1 The Council assessment of this site states:

Preferred for a Settlement Limit Extension on a site of 0.4 hectares.

Reasoned justification: The site is suitable for a Settlement Limit extension. The site would be accessible from Lamberts Way and is adjacent to residential development to the south and the east. The promoter has noted that they would wish to build one self-build dwelling on the site although the site is a sufficient size to potentially allow a larger number of properties.

3.2.2 The allocation of this site is considered to be unsound. The owner has asked for a self build dwelling, there is no indication that the site owner will bring forward a development which would satisfy local needs.

3.2.3 They have also had previous refusals on the site both by the Council and the Planning Inspectorate. The development would increase vehicle movements through a small cul-de-sac and has no boundary vegetation on its eastern or southern sides to protect amenity.

4 VCHAP questions

4.1 QUESTION 46: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.

4.1.1 No, we do not agree with the settlement limits changes which would effectively see the preferred allocations included within the defined area. Site SN0078 Land off Loddon Road, Ditchingham should be included in the settlement limits as it is deliverable, viable and available with no known constraints or ownership issues that would restrict its development.

4.2 QUESTION 47: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

4.2.1 We object SN0373, Land between Thwaite Road and Tunneys Lane being allocated as it would put the delivery of housing in the area in the control of one party who may land bank or build at their own market absorption rates. The site is not as well located to the village centre as SN0078 and would result in substantial harm to landscape quality/character.

4.2.2 If it is allocated the site should be as a reserve subject to the delivery of the DIT1 allocation within the next 2 years, failure to fully deliver that site should result in the removal of that allocation.

4.3 QUESTION 48: Do you support or object to the proposed use of the site? Please explain your reasons

4.3.1 We object to the allocation of this site. It's not being promoted for the allocation being offered and there is no evidence that it would deliver the housing suggested.

4.3.2 The site would impact negatively on both landscape and amenity and we also consider that the access road is not suitable for the increased traffic levels that would be experienced from this site if developed to its full potential.

5 Conclusion

5.1 Soundness

5.1.1 The NPPF sets out that plans must be sound to be adopted. The NPPF (para 35) sets out the following tests of soundness:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework

- 5.1.2 The two sites identified as preferred allocations have serious restrictions on them coming forward to meet the Councils objectively set needs. SN0373, Land between Thwaite Road and Tunneys Lane is reliant on a previous allocation being built out first and SN2011SL, Land off Lamberts Way, Ditchingham has not been promoted for the end use that is allocated. The allocations are not positively prepared.
- 5.1.3 The alternatives, specifically SN0078 Land off Loddon Road, Ditchingham, has not been considered fully. The development of the site would not result in significant loss of trees or impacts on the landscape. The consideration of landscape impact has not been justified; what harm would occur that is also not relevant to the two preferred sites?
- 5.1.4 The considerable doubts over delivery of the two preferred sites ensure that this part of the plan is not effective in delivering its requirement over the plan period. The aim of the plan should be to provide assurance and confidence about the delivery and timing of development, this has not been established with these preferred options. It could be established with our site promotion land.
- 5.1.5 Sustainable development is focused on delivering economic, environmental and social benefits. Given the doubts over delivery of the preferred sites how could it be considered that either of the sites would result in any benefits. The allocation of site SN0078 would provide market housing, affordable housing, ecological enhancements, tree management and landscape planting improvements. It would also deliver economic benefits for the immediate and wider location through construction and spending power of residents.

5.2 Recommendation

- 5.2.1 We would recommend the allocation of SN0078 to provide up to 15 dwellings within the first 5 years of the plan period.
- 5.2.2 We would also recommend that the Council engage with us to establish some principles for the new allocation wording.

Appendix 1 – Site Pictures



