

1.0 Introduction

- 1.1 These representations have been made on behalf of Ditchingham Farms Partnership and Beaully Homes Ltd.
- 1.2 By allocating more sites for development in the South Norfolk villages it would mean that the plan was Positively Prepared when assessed against the Greater Norwich Local Plan minimum 1,200 home village cluster housing requirement for the area. For example, allocating more sites in the Ditchingham area would provide more local benefits, as set out below.
- 1.3 The Greater Norwich Local Plan provides a 'minimum' housing requirement for the area of 1,200 homes. This allows flexibility in delivery. It is important that a range of sizes and types of sites are provided to deliver a range of housing for local people and to support local house builders. To make the plan sound further sites should be allocated in order to provide a wider range of opportunities for local housebuilders.

2.0 Land off Loddon Road, Ditchingham

Site Details

- 2.1 The site is identified by the reference SN0345 in the supporting document Updated Site Assessments Non-allocated sites January 2023. Ditchingham Farms Partnership object to the plan because this site has not been allocated for housing.
- 2.2 The site has no constraints to development. The site is very well related to the built-up area of Ditchingham. New homes on the site would reflect the existing pattern of development in the village. They could be integrated into the existing landscaping on the site without the need for extensive new planting. A high quality vehicular access is available and the development of the site can improve pedestrian connectivity in the local area.
- 2.3 The site is flat, and roughly rectangular in shape. It is around 1.64 hectares in size.



Figure 2.1: Site Location – Close Up View



Figure 2.2: Site Location – Aerial View

Landscape Character and Visual Impact

- 2.4 The site is well contained in the landscape. It is surrounded by built development, roads, or mature trees. There are houses along the western boundary. A thick screen of trees and houses exists along the northern boundary. Along the eastern boundary are a hedge and trees, and Tunneys Lane with homes beyond. On the southern boundary is a hedge with mature trees and the Loddon Road with a large number of mature trees to the south of the road.
- 2.5 The Loddon Road is lined with homes to the north along its whole length from the Norwich Road to the far west of Ditchingham until the site is reached. Developing the site for housing will therefore not be out of character with the local area. The junction of Loddon Road and Tunneys Lane, which has houses along its eastern side, is in the south eastern corner of the site. This junction is a natural edge to the village, with more open countryside, and more sporadic and less dense development further east. Development of the site would not be out of character because of the land uses immediately around it. The existing hedges and mature trees on the site's boundaries along Tunneys Lane and Loddon Road would help to assimilate the development into the landscape and would give it a mature character. The site appears out of character not being developed given its excellent relationship with the village, so housing development would not harm the character of the immediate area.
- 2.6 Any development on the site would enhance the boundary hedges and trees with new

native tree and shrub planting. This would result in hedges that would provide better screening and a better habitat for wildlife around the site. The development would meet the requirement of the NPPF to provide well designed places. It would meet the requirements of paragraph 130 by providing a development that functions well over the lifetime of the development, and which will be visually attractive as a result of a good layout and appropriate and effective landscaping.

Vehicular and Pedestrian Access

2.7 The site has the potential for excellent road and pedestrian access. The Loddon Road forms the southern boundary. This is a straight section of road with excellent visibility in each direction. An existing field access onto the Loddon Road could be the basis of a new vehicular access for the new homes. Using this access could avoid the loss of trees on the site frontage. The access is well placed centrally in the southern site road frontage. Any trees that needed to be removed or cut back could easily be replaced within the site. The site is therefore capable of providing a high-quality unconstrained vehicular access.

2.8 Good quality pedestrian access can be achieved to the site. The Waveney Road and Loddon Road junction, which is a few metres to the west of the south western corner of the site, has existing footways which lead to the corner of the site. These footways could easily be extended on land owned by the applicant or highways land a few metres to into the site. A good quality path could then be created behind the trees on the Loddon Road boundary of the site as part of the development. The path could be extended along the Tunneys Lane boundary of the side behind the trees that line the sites eastern boundary. This layout would retain the existing trees and hedges and would create an attractive walking route. The allocation of the site would have the advantage of providing easy pedestrian access to homes along the eastern side of Tunneys Lane which do not at present have pedestrian access into the village.

The surrounding roads have a good accident record with no recorded accidents from 2011 to 2021 for when recent data is available.

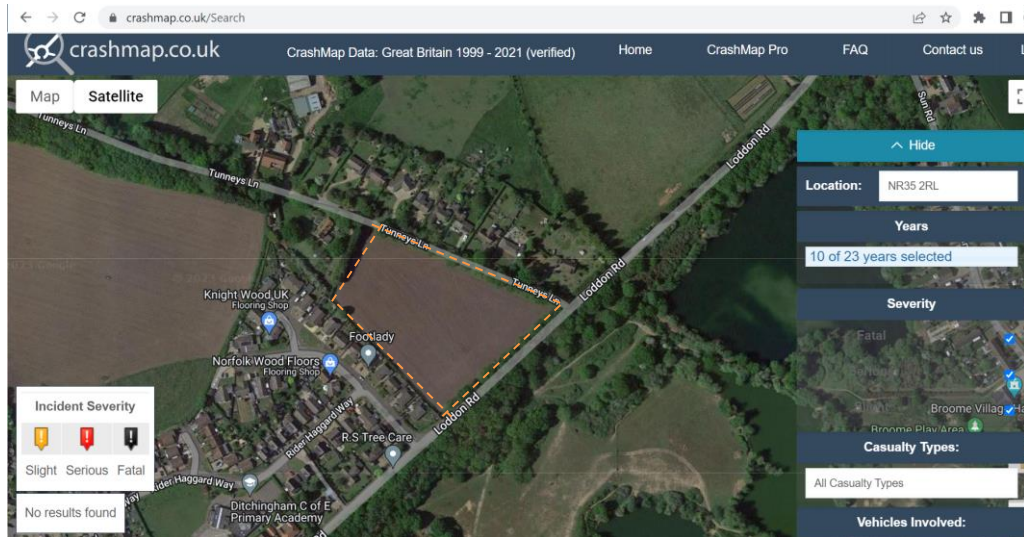


Figure 2.3: Crashmap

2.9 The proposed layout would give good pedestrian access along Waveney Road and Loddon Road footways to the village primary school, nearby bus stops, the village shop and playing field.

2.10 Paragraph 4.4.1 of Manual for Streets states that:

‘...Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to about 800m) walking distance of residential areas which residents may access comfortably on foot’.

2.11 In terms of local guidelines, the South Norfolk Place-Making Guide SPD September 2012 (currently available and referenced on the South Norfolk Council Website) at Section 3 ‘Place Making and Design Principles’ – 3.2 Uses and Activities states that:

‘...Wherever possible new development should be within convenient walking or cycling distance of existing local facilities. Where new facilities are required, they should be within walking distance of as many residents as possible (both new and existing residents), consistent with creating an appropriate site layout (assessed under 3.3.2 Integrate with surroundings).

If local facilities are not within walking or cycling distance then accessibility to public transport (assessed under 3.3.1 Public transport) becomes more important to allow people to reach facilities to town centres or other

settlements'.

- 2.12 The site is situated on the north-east extent of the village and would be linked with the amenities and facilities that Ditchingham has to offer. The site is located within an acceptable walking distance to several essential/desirable services including bus stops, a grocery store, primary and nursery schools, a children's playground, Broome village hall, and The Artichoke Public House and Restaurant.
- 2.13 Ditchingham Stores is the closest grocery store to the site at circa 700 metres/9 minutes' walk from the site; the next available shops are located to the southwest in Bungay at circa 2.0km from the site.
- 2.14 The Primary School, Ditchingham C of E Primary Academy, is located off Rider Haggard Way (via Waveney Road) and reachable from the site access on foot within a 5 minute walk time along good quality footpaths.
- 2.15 In terms of public transport, bus services are available within Ditchingham providing links to nearby towns.
- 2.16 Bus stops are located on both Loddon Road and Hollow Hill Road, reachable within walk times of 5-6 minutes and 9-10 minutes respectively.
- 2.17 Services available from the Loddon Road stops (Sun Road/Village Hall/Ditchingham Stores) include the 581 provided by Simmonds, which runs between Diss and Beccles via Harleston and Bungay and operates Monday to Saturday with an hourly frequency, although intermittent.
- 2.18 Services available from the Hollow Hill Road stops (Wood Close/Thwaite Road) include the 41/41A/41X provided by First Group. These services comprise 'The Charcoal Line' which comprises an hourly service at Norwich City Centre runs Monday through Saturday.
- 2.19 The site can be provided with good quality vehicular and pedestrian accesses, without needing the removal of trees and hedges. The pedestrian access can link to the homes along Tunneys Lane improving connections across the village. The site is within a short distance of village amenities and services such as the primary school, shop and bus services.

- 2.20 The development of the site in the manner proposed would comply with the NPPF policies on transport. Paragraph 104 requires that opportunities to promote walking and cycling should be identified. Paragraph 110 requires that safe and suitable access to the site can be achieved for all users. Both aims can be achieved.

Ecology

- 2.21 The site is in arable use and the only features of ecological interest are the trees and hedges along the northern, eastern and southern boundaries. These boundary features can easily be protected and retained in any development. The trees and hedges along the eastern and southern boundaries are in the control of the site owner. These trees and hedges can be improved with management and new planting to provide a better visual impact and more value for ecology.
- 2.22 A preliminary Ecological Appraisal has been undertaken by Wild Frontier Ecology. The conclusions of the report are set out below.

‘Regarding protected species, mostly the trees have negligible bat roost potential, but a small number were classified as having low bat roost potential (in accordance with Bat Conservation Trust guidelines), so if these needed to be felled it would need to be done in a sensitive manner (‘soft-felling’).

The nearby ponds on the common were appraised for suitability for great crested newts (GCN) were found to be suboptimal, primarily because they are fishing lakes, and fish and GCN don’t typically occupy the same water-bodies. Overall, our advice is that surveys for GCN (which are restricted to March/April to June) are not necessary because the proposed development site itself provides suboptimal terrestrial habitat for GCN, and the nearby ponds are actually fishing lakes which are suboptimal. The data search also returned no records of GCN within 2km of the site.

The survey found no signs of, or suitable habitat for any other protected species such as badgers, reptiles or water voles. Overall, therefore, we do not expect that any further ecological surveys (such as for protected species) would be required, assuming the standard best-practice mitigation measures can be adopted’

- 2.23 This assessment demonstrates that the site can be developed in a manner that

complies with national policy in the NPPF part 15, and which protects the local ecology. The development can provide a biodiversity net gain, by providing high quality landscaping.

Heritage Assets

2.24 The site is not within a Conservation Area and there are no listed buildings nearby. There are two Scheduled Ancient Monuments on Broome Heath to the south. An archaeological investigation would be carried out in the site to record any archaeology.

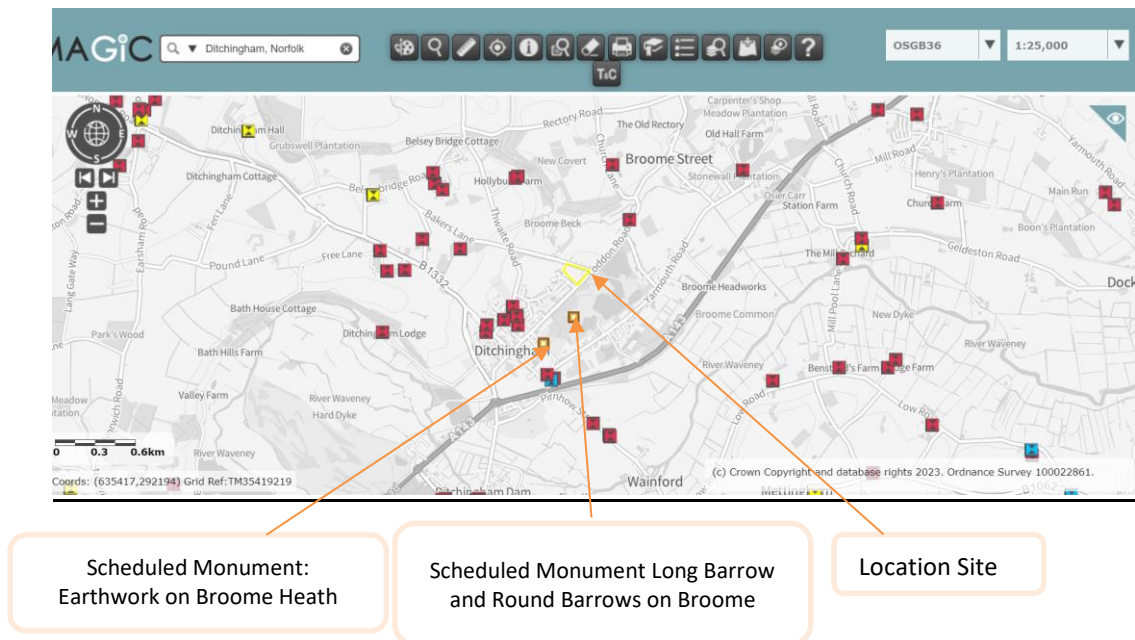


Figure 2.4: Scheduled Monuments and Listed Buildings

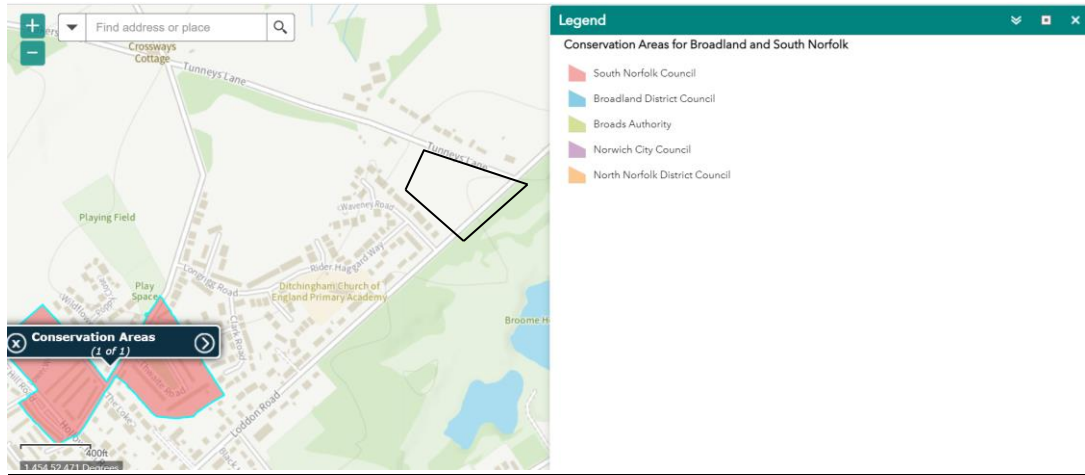


Figure 2.5: Conservation Areas

Drainage and Flood Risk

2.25 The site is free from constraints for drainage and flood risk. It is in the Environment Agency Flood Zone 1 and so is suitable for housing development.



Figure 2.6: Flood Zone Map

Site Layout

2.26 The allocation of the site for housing could provide 30 homes on its 1.64 hectares. An example Masterplan is shown below and is also appended to this document. Providing 30 homes would be a lower than average density (assuming 30 dwellings per hectare

density as average) which would be appropriate for the edge of the village where homes typically have larger plots. The low density will provide areas of open space and landscaping which would create a high-quality development. This would allow the development to deliver a biodiversity net gain. In particular, lower density development along Loddon Road and Tunneys Lane would create a high-quality edge to the development with attractive footways for the new residents and for the existing residents in homes along Tunneys Lane. The Masterplan shown below, and at the end of this text, allows the trees on the frontage Loddon Road and Tunneys Lane to be retained by putting the footways behind them within the site. This will allow the road frontages to be enhanced by managing the existing trees and putting in new landscaping. The vehicular access for the development uses the existing field access to avoid removing trees. Open space is shown near to the vehicular entrance. Lower density housing is shown on the edges to create a green edge.

- 2.27 The low density of development will allow a wide range of house types such as bungalows to be developed. Reasonable sized gardens can be created which will assist in greening the development, and which will also reflect the character of the area.
- 2.28 The development can be designed to comply with the provisions of the NPPF in part 12. The site area available will mean that a high-quality development can be created with a range of appropriate house types, good pedestrian links, enhancements to the existing trees and hedges and new landscape areas.



Figure 2.7: Illustrative Masterplan

Review of Updated Site Assessments Allocations and Settlement Limit Extensions January 2023 for Site SN 345

- 2.29 The Council's Village Clusters site assessment scores various site criteria red, amber or green. It concludes on the suitability of the site for an allocation based on the scores.
- 2.30 The access to the site is scored amber. A question is raised over the visibility splays. As set out Loddon above there is excellent visibility onto the Loddon Road which is straight in either direction for a considerable distance to the east and west of the site.
- 2.31 The assessment also says that the carriageway would need to be widened to 5.5 metres and a 2 metre footway would have to be provided. The carriageway along Loddon Road is appropriate for use without widening. It is an established road with a good safety record. A pedestrian footway could be provided within the site just to the north of the trees along the Loddon Road. This would provide pedestrian access to the new homes and to the existing homes along Tunneys Lane. This will provide a benefit by extending the pedestrian network to more homes in the village.
- 2.32 Based on the accessibility of the site the assessment of the vehicular access should be

green.

- 2.33 In respect of contamination and ground stability the Loddon Road site is assessed as amber and the allocated site as green. However, the assessment conclusions are the same for both sites. No constraints are raised so both sites should be green.
- 2.34 In a further assessment of highway impacts the Loddon Road site is assessed as amber and the allocated site as green. As set out above the Loddon Road site should be green as well as the allocated site amber.
- 2.35 The 'Initial Site Visit Conclusion' states that the Loddon Road site is amber based on the potential for a vehicular access. In addition, the need for offsite improvements, in the 'Achievability' section sets out that the Loddon Road site is graded amber because off-site improvements would be required. Whilst the allocated site is graded green. As set out above there is no reason to downgrade the Loddon Road site because of its access, when the development of the site would provide footway enhancements for neighbouring homes. No offsite works are needed on the Loddon Road site. The site has direct access to the highway in Loddon Road. A footpath along the northern side of Loddon Road reaches to the south west corner of the site and could be extended into the site on the site owners land or on highways land. Therefore, no offsite works will be needed and the site should be graded green.
- 2.36 The Loddon Road site has been downgraded because of its vehicular and pedestrian access. This is incorrect as vehicular and pedestrian access can easily be provided. The development would enhance pedestrian access to the surrounding area and so should be considered as the preferred allocation in Ditchingham. Without this change the plan will not be Justified by being the appropriate strategy.

3.0 Conclusion

- 3.1 The site is identified by the reference SN0345 in the supporting document Updated Site Assessments Non-allocated sites January 2023. Ditchingham Farms Partnership object to the plan because this site has not been allocated for housing.
- 3.2 The site has no constraints to development. The site is very well related to the built-up area of Ditchingham. New homes on the site would reflect the existing pattern of development in the village. They could be integrated into the existing landscaping on the site without the need for extensive new planting. A high quality vehicular access is available and the development of the site can improve pedestrian connectivity in the local area. The site has no constraints to development, in respect of vehicular and pedestrian access, heritage, local character, landscaping, flood risk, or ecology. The site is very well related to the existing pattern of development in the area and would make a logical allocation that would improve pedestrian connectivity to surrounding homes. The allocation would be Justified by the evidence and complies with national planning policy.
- 3.3 The Greater Norwich Local Plan provides a 'minimum' housing requirement for the area of 1,200 homes. This allows flexibility in delivery. It is important that a range of sizes and types of sites are provided to deliver a range of housing for local people and to support local house builders. To make the plan sound further sites such as this one should be allocated in order to provide a wider range of opportunities for local housebuilders.