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PLANNING

Document: South Norfolk Village Clusters Housing Allocation Plan -
Alternative Sites & Focused Changes

Title: Representations to the Regulation 18 Consultation

Client: Taylor Wimpey UK Ltd.

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South Norfolk Village Clusters Housing Allocations Plan - Alternative Sites & Focused Changes

Regulation 18 Stage (Focused Consultation)

Representations on behalf of Taylor Wimpey UK Ltd.

January 24th 2024

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1.0 INTRODUCTION

- 1.1 On behalf of Taylor Wimpey UK Ltd. (hereafter referred to as 'TW'), James Bailey Planning Ltd (hereafter referred to as 'JBPL') have been instructed to submit representations to South Norfolk Council on their Village Clusters Housing Allocation Plan (VCHAP) Regulation 18 Consultation on Alternative Sites & Focused Changes.
- 1.2 The VCHAP is being developed to deliver a minimum of 1,200 dwellings as set out within the Greater Norwich Local Plan (GNLP). The Plan was previously consulted upon at Regulation 19 stage in January 2023, with the Council's preferred options for residential allocations in 'Village Clusters', as well as proposed settlement limits.
- 1.3 Since reviewing the representations submitted at that stage, South Norfolk Council have subsequently acknowledged that one of the sites (VC ROC2, Rockland St Mary) is no longer deliverable, and that another site should be reduced in numbers to address heritage concerns (VC TAS1, Tasburgh). The Council acknowledges that this therefore leaves a shortfall of dwellings.
- 1.4 This new Regulation 18 consultation on alternative sites and focused changes, seeks to make up the resulting shortfall in order to deliver the minimum 1,200 dwelling requirement that is being referenced in both the VCHAP and GNLP.
- 1.5 The scope of this consultation is to seek views on what the appropriate buffer size should be, and also the suitability of the 13 alternative sites. The remainder of the January 2023 Regulation 19 document is not part of this consultation.
- 1.6 These representations, on behalf of Taylor Wimpey, therefore directly address these focussed questions only.

2.0 QUESTION 1:

The Village Clusters Plan needs to ensure the allocation of 1,200 dwellings on new sites, for delivery in the period up to 2038. In terms of the overall number to be allocated, which of the three options above do you consider the most appropriate?

2.1 TW note that the Interim Sustainability Appraisal (November 2023) states that:

“With regards to the total quantum of additional supply that should ultimately be supported, it is difficult to draw conclusions; however, it is important to say that there is a need for a healthy ‘buffer’ above-and-above the required 1,200 homes figure, as a contingency for unforeseen delivery issues (that might arise either prior or subsequent to plan adoption). Also, there is a need to recall that the 1,200 homes figure is a minimum figure that was established some time ago, and there is generally a need to take a proactive approach to housing growth / meeting needs.”

2.2 TW agree that it is important to maintain a healthy buffer of housing sites over and above the minimum dwelling requirement.

2.3 However, the Council must also be able to demonstrate transparently that the sites identified can be delivered in order to meet the test of soundness – if it is to be “Effective”. At the same time, the Plan must also be prepared based upon the most appropriate strategy informed by a robust evidence base and guided by the Sustainability Appraisal – if it is to be considered against the soundness test of being “Justified”.

2.4 TW raise a number of queries in relation to the suitability of the alternative sites within this Plan as set out below, which questions whether the tests of soundness can be met.

3.0 QUESTIONS 2- 14

- 3.1 Questions 2 – 14 relate specifically to the alternative sites being proposed through the new Regulation 18 consultation.
- 3.2 TW’s response focusses upon five of the sites within five different Village Clusters, and therefore only seeks to respond to the questions which relate to these specific sites.
- 3.3 TW have chosen these five sites as they clearly demonstrate the concerns TW have regarding the suitability and deliverability of the sites, and ultimately the effectiveness of these sites in meeting the Plan’s objectives.
- 3.4 This sample of five sites, shines a light on the strategy of the Plan as a whole and in doing so, questions whether the tests of soundness can be met.

4.0 Alpington and Bergh Apton Cluster

Question 2a: Do you agree with the allocation of SN0433, Land south of Wheel Road, Alpington for at least 12 dwellings on an area of 1.0ha?

Deliverability

4.1 TW has reviewed the evidence supporting this site and conclude that there are still significant questions regarding the achievability of the access, which is fundamental to the delivery of this site.

4.2 This is recognised within the Interim Sustainability Appraisal Report (Nov 2023):

“...one site to flag is SN0433 (Land south of Wheel Road, Alpington). Specifically, this is an example of a site where further work is needed to confirm that suitable access can be achieved (without undue impacts to existing hedgerows). It would clearly be possible to confirm access arrangements prior to plan finalisation (as opposed to leaving this as an issue to be addressed at the planning application stage), but there is nonetheless a clear argument for ruling out sites where access arrangements are uncertain, given the recent experience at Rockland St Mary, which has led to a delay in progressing the Village Clusters Plan.”

4.3 It is surprising that, given the experience at Rockland St Mary, which has in part triggered the need for further consultation, the Council are now consulting upon another site with such clear risks to delivery. As identified within the Sustainability Appraisal, there does not appear to be conclusive evidence that a suitable access can be achieved. It should clearly be possible to confirm this either way, however, there does not appear to have been any attempt to do so.

4.4 Sites must clearly meet the tests of soundness, including being ‘deliverable’, if they are to be taken forward. If SN0433 cannot clearly demonstrate a suitable and achievable access, then the site should be discounted at the current time.

4.5 It is noted that within the Supporting Document ‘Consultation on Alternative Sites & Focussed Changes (Dec 2023 – Feb 2024)’, Norfolk County Council Highways raise some substantial concerns regarding the access to this site: *“From a Highways perspective the entire frontage needs improvement; could widen Wheel Road, however this would require substantial hedge removal.”*

4.6 This response from Highways was in relation to a higher number of dwellings on this site (25), although there is no further comment from Highways in relation to the current smaller site.

4.7 It is unclear why further consultation with Highways has not taken place in relation to this smaller site, however, this has resulted in a rather inconclusive policy text which states that:

“The main concerns with the site relate to the provision of a suitable access from Wheel Road. The proposal is now for a significantly reduced level of development, potentially accessed via

non-adopted roads. However, development of any scale on this site is likely to result in at least the partial loss of the frontage hedgerow. Therefore, key to the suitability of the site will be demonstrating that an appropriate access can be achieved which balances the need for additional housing along with the impacts on the character of the locality.”

- 4.8 As highlighted with the Sustainability Appraisal, it would be possible to establish whether a safe and suitable access can be achieved with required visibility splays, given the site is being promoted by a developer. However, there is no published evidence to suggest that a safe access can be achieved. Furthermore, even if access improvements are possible for this site, are they viable? This is flagged up within the Sustainability Appraisal:

“It is also noted that this site at Alington is proposed for only 12 homes. In this light, there is a need to question whether any abnormal development costs necessary in order to achieve suitable access could impact development viability to the extent that it becomes challenging to deliver the full policy quota of affordable housing.”

- 4.9 In relation to this deliverability information, the ‘Updated Site Assessments for Consultation Sites’ document provides no indication that the promoters have been contacted since they put the site forward, (which in this case was back in 2016 when the site was put forward as part of the GNLP Call for Sites).
- 4.10 To illustrate this point about seeking clarity on certain issues, JBPL refer to the Question: *“Has the site promoter confirmed that the delivery of the required affordable housing contribution is viable?”*. In response to this, the Council have answered this question with *“Yes, at the time of submission in 2016”*.
- 4.11 This is some 8 years ago, before additional viability considerations were brought over and above the potential requirement for access improvements, notably nutrient neutrality. Given the strain that nutrient neutrality mitigation has placed upon small and medium sized house builders, there must be greater certainty with more up-to-date evidence provided by the promoter / developer that this particular site is viable and deliverable.

Infrastructure Impacts within the Cluster

- 4.12 If the additional site SN0043 is allocated, this would result in total dwelling growth of 62 new dwellings. This is not insignificant growth within a rural area, and raises the question whether the infrastructure requirements and potential planning benefits have been fully considered.
- 4.13 The Site Assessments do not appear to consider primary school capacity, yet many village schools which have small class sizes (20) are oversubscribed, such as Alington and Bergh Apton Primary School, which is oversubscribed¹.
- 4.14 There is no information to demonstrate that the cumulative impact of these sites has been considered, and that the impact upon the primary schools is acceptable.

¹ Primary and Infant Schools in Norfolk Document 22/23. Norfolk County Council.

4.15 Is the Council satisfied that there is sufficient mechanism in place to ensure that sites developed in a piecemeal manner will contribute appropriately to infrastructure required, for example to primary school provision?

5.0 Barford, Marlinton, Colton and Wramplington Cluster

Question 3a: Do you agree with the allocation of SN0552REVC, Land north of Watton Road, Barford as an extension to VC BAR1 for up to 20 additional dwellings on an area of 0.73 ha?

Suitability

- 5.1 TW questions the rationale behind including a previous omission site, which was originally omitted primarily on the basis that it was assessed as 'red' in the Site Assessment, concluding that:

"Development would have a significant impact on the landscape and would not respect the existing character of the village".

- 5.2 The subsequent SNVCHAP Landscape Visual Appraisals Document also concludes in relation to this site, that: *"Development on this site would have a significant impact on views to and from the north and west and would significantly impact the transition to and from the village in this area. The site is outside of the natural boundaries for Barford and would be unlikely to naturally integrate into the existing built form of the village".*

- 5.3 It is surprising therefore that a site with such a significant impact upon the landscape has been proposed as a 'reasonable alternative'.

- 5.4 TW therefore question whether the impact of this scale of growth in relation to Objectives 2 and 3 of the Plan been fully considered.

- 5.5 TW wish to draw the Council's attention to one of the core objectives of the Plan, SNVC Objective 3, which is to 'Protect the character of villages and their settings'. Allocation of this site would be at odds with this core objective. Indeed, the Sustainability Appraisal queries the rationale behind including this site:

"The other key site to consider is previously shortlisted omission site SN0552REVC at Barford (0.73Ha; up to 20 homes). This is because development would extend the village form beyond Back Lane, which has historically formed the western extent over the village (see historic mapping), and because there is a Grade II listed building opposite the site that is fairly prominent on the approach to the village from the west."

- 5.6 Not only would the site itself have a significant visual impact, but a further allocation in this cluster would also result in the total allocation of 70 dwellings. The Sustainability Appraisal questions this quantum of growth: *"...however, there is a need to question the potential total growth quantum at Barford, which is 70 homes (given an existing allocation for 20 homes)."*

- 5.7 SNVC Objective 2 of the Plan is to 'Protect village communities and support rural services and facilities'. While the additional growth will have the potential to support rural services and facilities, the Sustainability Appraisal questions whether this level of growth is at odds with the

small-scale nature of this Plan. Ultimately, whether opportunities will be missed for planning gain or benefits, due to the piecemeal nature that the sites will come forward.

- 5.8 Proposed growth of 70 dwellings in this cluster is not insignificant growth within a rural area, however the Site Assessments completed as part of the evidence base do not provide any level of assessment in terms of any 'cumulative impacts' of these sites. For example, whether the primary school has capacity for expansion.
- 5.9 Therefore, it is questioned if the Council is satisfied that there is sufficient mechanism in place to ensure that sites developed in such a piecemeal manner, will contribute appropriately to any infrastructure required?

Deliverability

- 5.10 There is little confidence in terms of deliverability evidence to support this site. This is openly acknowledged by the Council. The Site Assessment for SN0552REVC states that:

"The site promoter has indicated the site is deliverable. However no supporting evidence has been provided to support deliverability, in particular the extensive areas of open space offered as part of the scheme."

The Assessment continues to state that:

"The site would be contingent on the delivery of the site east of Back Lane (SN0552REVB) in order for highways access to be achievable. As the site opposite is already considered to be a preferred site and was included in the Regulation 19 version of the VCHAP, it is considered that it would be possible to deliver this site either alongside or after the development of SN0552REVB (Policy VC BAR1)."

- 5.11 If the delivery of this site is dependent upon the delivery of another site first, then it needs to be planned comprehensively and allocated as one site, albeit it may come forward in phases. However, the Council must assess the impact of this site **and** the adjacent site being developed, as a 'whole'. Failure to do so could lead to a greater impact as opportunities could be missed for mitigation.
- 5.12 In conclusion, the evidence against the site on land north of Watton Road, Barford, raises the question of whether it is justified to include a site of such impact. This is only compounded by the lack of assurance in terms of its deliverability. All of this suggests that this site is not a suitable candidate for allocation.
- 5.13 This begs the question in terms of whether the benefits are great enough that in the planning balance the impact upon the character of the surrounding area is acceptable. A site so finely balanced is clearly a risk to deliverability, as there are no assurances that this will be acceptable in planning terms.

6.0 Ditchingham, Broome, Hedingham and Thwaite Cluster

Question 8a: Do you agree with the proposed allocation of SN4020, Land west of Old Yarmouth Road, Broome for at least 12 dwellings on an area of 0.76ha?

- 6.1 Site SN4020, if allocated, would extend the linear settlement of Broome, which is a location that does not score well in accessibility terms. This is acknowledged within The Sustainability Appraisal, noting that:

Specifically; the site at Broome performs relatively poorly from immediate accessibility perspective...”

- 6.2 The site would also extend into the open countryside and would alter the edge of the village significantly; *“Broome (option to allocate a previously shortlisted site for 12 homes) – would extend the current linear / frontage only built form further into the open countryside, and the LVA in the Supporting Documents notes the need for careful design and landscaping to create a gateway to Broome”*. (Interim Sustainability Appraisal, 2023).

- 6.3 There are no other reasonable alternative sites in Broome. Therefore, the Sustainability Appraisal considers the alternative option, which is to allocate additional growth to Ditchingham that is well served in terms of services and facilities. However, this alternative option is to extend a site even further that is already proposed for allocation for 45 dwellings, making a total of 57 dwellings. The Sustainability Appraisal raises concerns here in terms of then whether this goes against the Objectives of the Villages Clusters Plan:

“...the site in question (Broome) is not very well located in terms of walking to village services, with the primary school at Ditchingham 1.5km distant. The question therefore arises as to whether additional growth at Ditchingham is preferable to supporting this site at Broome. However, it is recognised that accommodating all of the development from this site on the revised Ditchingham allocation would create the largest allocation in the Village Clusters Plan, leading to a tension with the Plan objectives.”

- 6.4 The question therefore is: Has the Village Clusters Plan failed to provide a clear and appropriate strategy towards delivering sustainable rural growth?

- 6.5 It is difficult to achieve small-scale growth in small villages in the region of 12 dwellings, without making a significant impact upon the open countryside. Therefore, other locations within the cluster could provide more sustainable options. However, this may not be possible because if sites then become too big, and are then contrary to the Objectives of the Cluster Plan.

- 6.6 In identifying additional sites, there needs to be a clear and obvious rationale behind how the Objectives of the Plan are being met. Is the priority to ensure that there is a genuinely dispersed approach to growth; or is there a preference for allocations to be focused towards the higher order settlements within the Cluster, which goes against a more dispersed approach to growth?

7.0 Earsham

Question 9a: – Do you agree with the allocation of SN0218REV, Land north of The Street, Earsham for up to 25 dwellings on an area of 1.4ha? Please explain your response.

7.1 The allocation of this site (SN0218REV) would result in a total of 50 dwellings being allocated to Earsham, (as there is another site allocated for 25 dwellings).

7.2 The difficulty with this site is that, as raised within the Sustainability Appraisal, it is a smaller parcel of a wider site that could come forward in the future. This raises the question as to whether opportunities for planning benefits will be missed if the whole site is not considered.

“This site comprises half of an agricultural field, such that there could be pressure on the remaining half in South Norfolk Village Clusters Plan SA Interim SA Report AECOM 8 the relatively near future. As such, consideration might be given to a comprehensive scheme (e.g. 50 homes) that delivers additional benefits for the village. However, it is recognised that this would run counter to the objectives of the Village Clusters Plan, particularly as there is another preferred site of 25 homes at Earsham.”

7.3 Again, this highlights the tensions within the Plan, between the desire to ensure that these developments not only support existing services (SNVC Objective 2), but also contribute to providing additional benefits where required. It is currently unclear within the Plan whether additional benefits or infrastructure upgrades will be required from these developments, as a piecemeal approach to growth makes this extremely difficult to secure.

7.4 It is therefore questioned whether all of the alternatives have been fully explored in order to ensure that the strategy is the most appropriate. For example, is allocating 50 dwellings on this site a better option, as opposed to identifying two sites in Earsham on separate sites that advocates a more piecemeal approach to development? There is no evidence that these options have been fully explored. Is it not better to ensure that a single larger site is identified that secures the maximum benefits for the village, rather than adopting a piecemeal approach that risks missing such benefits?

7.5 The rationale behind allocating parts of sites must be fully explained. Failure to do so means that the approach taken is simply not “Justified”, and should therefore fail the test of soundness.

8.0 Spooner Row and Sutton Cluster

Question 12a: Do you agree with the proposed allocation VC SP01 REV, Land west of Bunwell Road, Spooner Row, for approximately 35 dwellings on 2.34ha?

- 8.1 The proposed allocation (VC SP01 REV) increases a previously allocated site from 15 to 35 new dwellings, to make better use of field boundaries. The Sustainability Appraisal states in its conclusions for this site that:

“the Spooner Row expansion pushes the numbers in the village to the upper end of the range considered appropriate given the objectives of the Village Clusters Plan.”

- 8.2 In a similar manner to comments raised in these representations in relation to other sites, TW question whether the Council are satisfied that they have fully explored the benefits of maximising the full extent of field parcels, which have been put forward to ensure the most appropriate strategy for each village cluster is taken forward. The Sustainability Appraisal highlights the need to do this to ensure that benefits are maximised from the development:

“Moving forward, there should be ongoing scrutiny of the appropriate growth quantum, with a view to maximising the benefits of development. For example, the site might be suited to delivering a new children’s play area and/or accessible green space.”

- 8.3 It is also noted that the Interim Sustainability Appraisal raises the possibility for expansion of an already allocated site – SPO02. While the SA does state this expansion could be one of a strategic nature, (which is at odds with the Plan), it raises the question as to why this site has not been explored for expansion over SPO01? The Sustainability Appraisal notes the sustainable nature of SPO02:

“Attention focuses on SPO02, which is located very close to the train station. However, in practice, were higher growth options to be brought into play, then there could be arguments for significantly boosting the site capacity, such that the approach to growth at the site in question, and for Spooner Row as a whole, would be of a strategic nature (not the aim of the Village Clusters Plan).”

- 8.4 There are now four small and medium sized sites allocated within Spooner Row. Are the Council satisfied that allocating four smaller parcels, as opposed to a fewer number of larger sites, is the most appropriate strategy to take forward?

- 8.5 While it is appreciated that the intention of the Plan is to allocate sites of less than strategic scale (i.e. between 12 and 50 dwellings), when a settlement such as Spooner Row is taking in region of 80 dwellings, albeit from smaller sites, is the Council satisfied that this total quantum of growth meets with all of the other Objectives of the Village Clusters Plan?

9.0 SUMMARY AND CONCLUSION

- 9.1 Taylor Wimpey have raised a number of concerns regarding the deliverability and suitability of some of the additional site allocations within this Regulation 18 consultation. This in turn raises questions regarding the overall strategy approach that is being taken by the SNVCHAP. These concerns are summarised below.
- 9.2 Deliverability has been questioned on some of the sites, as fundamental issues, such as access have yet to be determined / confirmed. This is evident within the proposed allocation of the Wheel Road site at Alington – SN0433.
- 9.3 There is also a lack of deliverability evidence in terms of viability, whereby information appears to be outdated in terms of contact made with the promoter / developer. The ability to deliver a viable development is especially important for those sites in the nutrient neutrality areas, given the onsite mitigation that may be required.
- 9.4 Due to the need to find additional sites, some clusters are now experiencing fairly significant growth in relation to their relative size. Growth also appears to be proposed in a piecemeal manner, for example in Barford, Ditchingham and Spooner Row. This raises the question as to whether unnecessary strain will be placed upon the existing infrastructure and whether opportunities will be missed for benefits to be secured for these villages.
- 9.5 The sentiment behind the document and the objectives for smaller places to have sustainable growth is one to be supported. However, the reality, and the way which this document is progressing, suggests that this focus is being lost. Some clusters appear to be ending up with larger growth across a number of sites, and these clusters may see very little benefit from a piecemeal nature in which these sites will come forward.
- 9.6 The South Norfolk VCHAP document should be informed by the Sustainability Appraisal, otherwise it is questioned what purpose an important evidence base document provides to the Council. It is evident that this Sustainability Appraisal has posed a number of questions, which need to be answered with a clear rationale provided by the Council in terms of how the Council are meeting the Objectives of the Plan, particularly where tensions have been identified in terms of overall quantum of growth. It is unclear why some further sites are being sought in certain clusters, where previously proposed allocations are capable of expansion for example.
- 9.7 For the reasons set out above, the additional sites proposed as part of this consultation raise the question of whether South Norfolk's Village Clusters Plan has failed to provide a deliverable Plan.
- 9.8 At present, does it provide a genuinely clear and appropriate strategy towards delivering sustainable rural growth, that meets the tests of soundness?

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