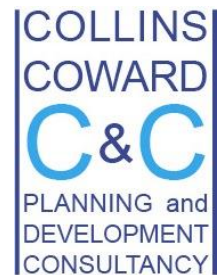


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Our Ref: CC/1000

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South Norfolk Council
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AFR Collins
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Dear Sirs

South Norfolk Village Clusters Housing Allocations Plan Regulation 18 'Alternative Sites and Focused Changes' - Consultation

We refer to the above consultation. We write to object to the proposed allocation at Bawburgh (Ref: Bawburgh VC BAW1REV). The basis for the objection is that the proposed allocation remains unsound.

The starting point is that national planning guidance in the **National Planning Policy Framework** (NPPF December 2023) has removed the need for housing targets. Therefore, the *raison d'être* for the 1200 minimum residential units as set out the Plan is no longer a requirement. The new approach is to calculate housing need based on an "advisory starting point" which can be allow for an increase or decrease in numbers depending upon circumstances. Therefore, the assumption the plan must provide at least 1200 units is no longer correct. In its place must be a total number of units driven by each proposed site's ability accommodate residential development. This approach requires a proper consideration of the factors affecting each site. In this regard we consider the allocation at Bawburgh should be deleted as it wholly fails to properly assess the site.

Allocation BAW1REV

The starting point should be to consider whether the proposed site would obtain planning permission in the absence of a proposed allocation. In this case a number of important planning considerations would indicate that permission would not be granted and tell against the allocation.

The Council's first Regulation 18 consultation led to a considerable number of objections including those made by this Company. The result was that the Council now proposes to increase the size of the site without any proper consideration of the impacts.

The Council accepts (Page 82 of the **Statement of Consultation**) that Bawburgh is not part of a "**cluster**" but has been selected because it has a primary school. Of course, sustainability is more than the availability of education, but in this case all other factors have been discounted. Therefore, the principle of the allocation is fatally flawed. There are no shops, employment, health facilities, bus services, cycle

or pedestrian routes, so all trips will involve private cars. This is fundamentally contrary to the NPPF's sustainability objectives. The Council accepts there is no services in the village but seeks to make one of the largest allocations in the Plan within Bawburgh. The fact that Bawburgh is not part of a village cluster should indicate a much lower number of units or no allocation on the site. Contrary to the Council's view, the number of residential units does not dictate the speed of delivery. In fact, our experience is that smaller sites with fewer units can generally be delivered more quickly than larger sites.

Although the highway authority has made no objection to the proposed traffic flows it has not considered the highway safety implications with an uncontrolled narrow bridge in the village and no alternative means of travel.

The Council claims that the Greater Norwich Local Plan ("GNLP") proposes modest growth in village clusters. The Council has not carried out any calculation as to what "**modest**" means. There are 231 residential units in the village and therefore the proposal to allocate 35 units represents an increase of 15%. This in our view is not modest and will have a significant impact on the character of the village.

The size of site is now proposed as 1.9 hectares which is above the site size guide in the NPPF which states small sites should be no more than 1.0 hectare. The proposal for 1.9 hectares is akin to an urban allocation.

The Council accepts in the **Statement of Consultation** that "***whilst there may be conflict with specific paragraphs of the NPPF when taken individually, the Village Clusters Plan and the sites of the VCHAP are part of a balanced portfolio of development options across greater Norwich***". When looking at Bawburgh there are no aspects of the proposal that meet the requirements of the NPPF.

The Council's response in the **Statement of Consultation** was to dismiss all objections to the proposed allocation save to give consideration to the site's density. This was because the Council used the same proposed urban density of all sites across the district to achieve its housing numbers. This urban density of 25 units per hectare is wholly inappropriate to a rural village context. The most recent permission (Ref: 2018/1550) close to the site (alongside the Village Hall), had a density of 9 units per hectare. This was not considered by the Council in its assessment of the site. The Council is now proposing to retain the total number of units but increase the size of the site to 1.9 hectares which would result in a density of eighteen units per hectare, again twice the density of the last approved housing development in the village. No explanation is given as to why such an increase in density is acceptable.

Paragraph 112 of the NPPF confirms that density should only be optimised where sites are well served by public transport - Bawburgh is not such a location. Paragraph 130 of the NPPF confirms "***that significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area***". There are of course no density policies or guidelines in the consultation draft local plan. It has simply not been considered by the Council.

The Council considers that a "**small**" site is one up to 50 units, but this is not supported by the NPPF which uses a site guide of up to one hectare in size. Clearly 50 units on one hectare is wholly unacceptable in all rural locations.

It is somewhat surprising that no footpath or other highway improvement have been suggested by the highway authority. Given the site would be wholly reliant on private cars – there are no alternative means of travel.

Landscape impact is not fully considered as part of the allocation. The Council's response in the **Statement of Consultation** suggests any application should be accompanied by a landscape impact assessment. However, that should have been carried out as part of the proposed site assessment before allocation. The site can obviously be screened from the A47, but the more significant matter is the loss of views across the Yare valley from Stocks Hill. This is an important view in a section of road with sporadic linear development. This view would be lost completely whereas the current view provides glimpses of countryside as part of the village character. This reflects a lack of site assessment by the Council. No real consideration has been given to the **Norwich Southern Bypass Landscape Protection Zone** (NSBLPZ) where even landscape screening would be detrimental to the spatial context of the landscape. The importance of landscape character is recognised under the NPPF 180 (b). Notwithstanding the landscape value we are advised the agricultural land quality is Grade 3a which constitutes "Best and Most Versatile". Accordingly, such land should not be developed unless there is no land in the District of less quality (ie. 3b, 4 or 5). No assessment has been carried out by the Council in its site selection.

The primary school is over subscribed which includes some children outwith the village catchment. The development would generate ten primary school children. It would take a number of years post development to accommodate all these pupils (if prioritised) to be accommodated. In the transition they would have to travel outwith the village. There is no local accommodation for secondary school pupils and no bus services.

In respect of health services there are no facilities in the village. The Humbleyard Practice which serves the village and other areas is oversubscribed by more than 6,000 patients (Surgery Newsletter). The occupiers of the new development would struggle to find access to health care provision.

The proposed increase in the site size is not supported by any technical studies, no qualitative or quantitative assessment. In fact, no thorough assessment whatsoever.

Conclusion

It is clear the proposed site does not meet any of the policies and objectives of the NPPF, which is acknowledged by the Council. Therefore, in the absence of a draft allocation a residential development of this site would never be permitted. The site should be removed as a proposed allocation on the basis it is not sound.

We trust that this is satisfactory for your purposes and look forward to appearing at the public inquiry in due course. Please contact Tony Collins if you require further information or clarification.

Yours faithfully



Collins & Coward Ltd