

OBJECTION TO SITE SN0433 – VCHAP CONSULTATION ENDING 05/02/2024

(document consisting of pages 1 to 4 & plans 1 to 3)

1.0 The Site Access, The Reasoned Justification & Deliverability

1.1 The need to do further work to assess feasibility of access and the need to assess the implications of the electricity lines is specifically identified in assessments but plainly has been simply ignored. There is no evidence the site is deliverable and it should be discounted.

1.2 The principle of achieving a suitable access to SN0433 has never been established. The resultant impact on the historic hedgerow is that only approximately 22% will remain (**Plan 2**) this constitutes it's "removal". Replacement hedging can be no higher than 60cm, neither replacing the visual screening nor the biodiversity of the historic hedgerow. The reduced scale scheme still retains all the impact of significant change to the character of the area and the landscape character that led to the 25 dwelling scheme being discounted. SN0433 will appear as a suburban sprawl where once was countryside.

1.3 The assessment under heading **1.0** is on the terms of the reasoned justification alone. Heading **2.0** addresses the site promoter's intention to carry out highway improvements with an even worse outcome.

1.4 The Reasoned Justification states:

The main concerns with the site relate to the provision of a suitable access from Wheel Road. The initial assessment of the site assumed a higher density of circa 25 dwellings, which would be likely to require removal of the substantial frontage hedge (with trees) in order to facilitate the necessary highways improvements. These highway improvements would affect the whole site frontage from the Reeders Lane/Burgate Lane junction (which itself would require improvement) to the Wheel of Fortune and would significantly change the character of the area and raise concerns in terms of wider landscape character.

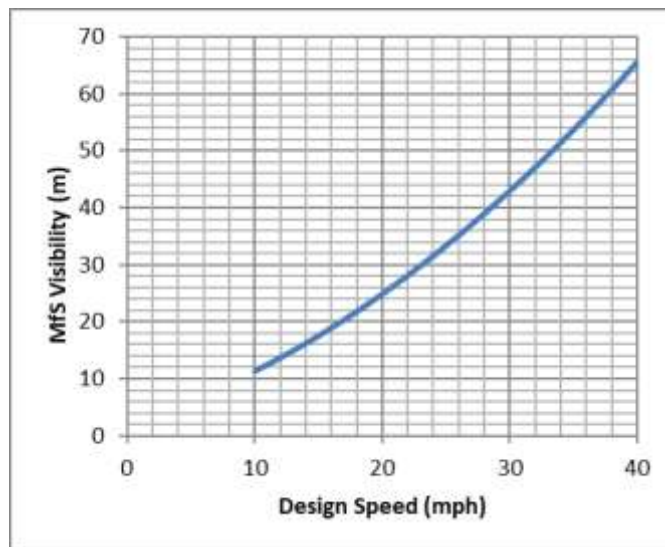
The proposal is now for a significantly reduced level of development, potentially accessed via non-adopted roads. However, development of any scale on this site is likely to result in at least the partial loss of the frontage hedgerow. Therefore, key to the suitability of the site will be demonstrating that an appropriate access can be achieved which balances the need for additional housing along with the impacts on the character of the locality. Replacement planting to the front (north) and new planting to the rear (south) of the site could help mitigate the impacts.

1.5 The Interim Sustainability Appraisal Report (Nov 2023) States

"...one site to flag is SN0433 (Land south of Wheel Road, Alington). 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.”

1.6 Despite it being identified that “further work is needed” there is an absence of information from the site promoter. I have therefore assessed access and applied 43m x 2.4m visibility sight lines, this was the required dimension for the development of 10 dwellings to the East of The Wheel public house, corresponding to vehicle speeds of approximately 30mph.



1.7 **Plan 2** appended to this document, plots the visibility sight lines. I have made the assumption that 2 access points are required to achieve the required site density. This is reasonable as 2 access points served the 10 dwelling scheme to the East by the same site promoted. The site promoter has actually verified that 2 access points are intended in their own consultation comment. It is reasonable to assume the 2 access points will be some distance apart or their purpose to distribute traffic is not served, I have placed a site access on each of the 2 straighter sections of road as highways would require.

1.8 The resultant impact on the hedgerow is that only 22% will remain, constituting it's “removal” . All the concerns remain of significant change to the character of the area and the landscape character, these concerns resulted in the 25 dwelling scheme being discounted. I direct the reader to Taylor Wimpey's objection document prepared by James Bailey Planning that further substantiates why in this situation SN0433 must be discounted.

“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.”

2.0 The site Access, The Site Promoter's Stated Intention & Deliverability

2.1 The site promoter's stated intention within their consultation response should of course be taken as a material consideration.

2.1 The site promoter's stated intention is to widen the road and to provide a 2m wide footpath, this will result in the hedgerow being removed and drainage ditch disrupted, as shown on **Plan 3**. The larger 25 dwelling scheme was discounted on this very basis. SN0433 is not deliverable on this basis.

3.0 Unaddressed Constraints & Deliverability

3.1 The January 2023 site assessment identified the power lines as a constraint,

"Need to establish whether the 33Kv power lines are a constraint".

Despite this "need" having been identified, the feasibility of constructing dwellings in close proximity to the lines has not been investigated by the site promoter and there is no certainty that SN0433 is deliverable, this is a fundamental gap in demonstrating deliverability. **Plan 1** shows the approximate route of the lines and the pylon position, the lines divide the site into 3 parts.

3.2 A field drainage ditch, runs between Wheel Road and the Hedgerow, it has not been acknowledged in the site assessments. The road widening and 2m pavement proposed by the site promoter will result in the loss of the ditch, the impact in principle of this has not been assessed. It is an anomaly that the site promoter makes no mention of this ditch despite conversely referring specifically to the retention of another much shorter ditch to the Eastern boundary alongside the Wheel Pub.

3.3 The site should be discounted at this current time, there is no certainty that SN0433 is deliverable.

4.0 The Terms of the Consultation.

4.1 The reasoned justification states the current proposal is a reduced scale of development from the original proposal for 25 dwellings. The terms of the consultation for "at least 12 dwellings" conflicts with this justification as there is no upper limit on dwelling numbers. A review of the other consultation sites shows that reasoned justifications apply

either “approximate” or “maximum” dwelling numbers. This conflict both undermines the ability of the public to accurately assess the proposal and leaves the door open in principle for the denser development that was discounted with all its associated impact. When I questioned this with a senior South Norfolk planning official they responded that this allowed flexibility at planning application stage. That flexibility of course is only the flexibility to build a development of greater density not lesser density and so is only in the interest of the site promoter.

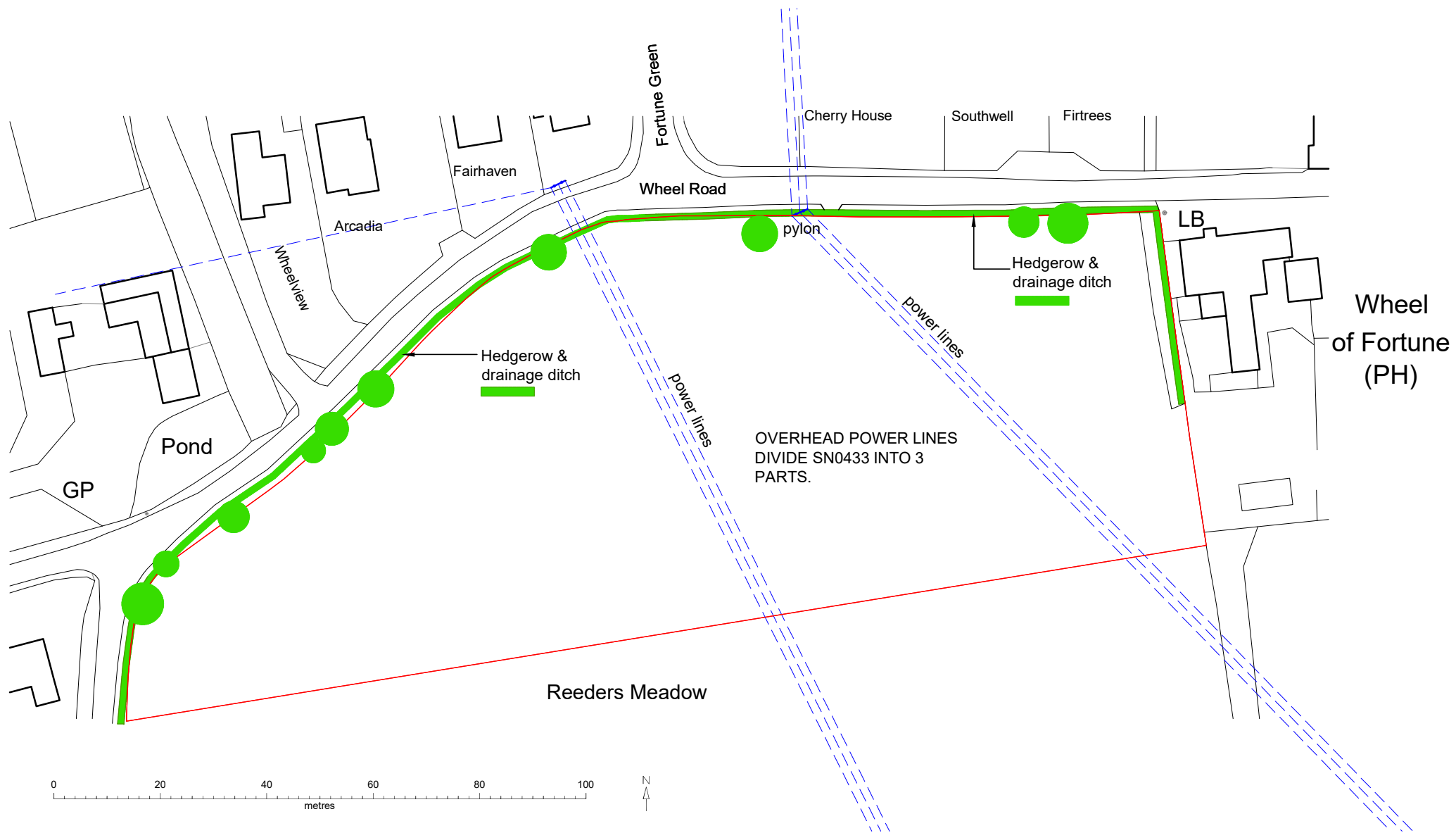
5.0 Unjustified Support for The Proposal

4.2 I direct the reader to Taylor Wimpey’s objection document prepared by James Bailey Planning, this explains how the site promoter has submitted nothing to aid accurate site assessment and to address stated clarifications.

The site has nonetheless been promoted as a “reasonable alternative” despite there existing unresolved fundamental constraints such as the matter of access, electricity pylons and drainage ditch.

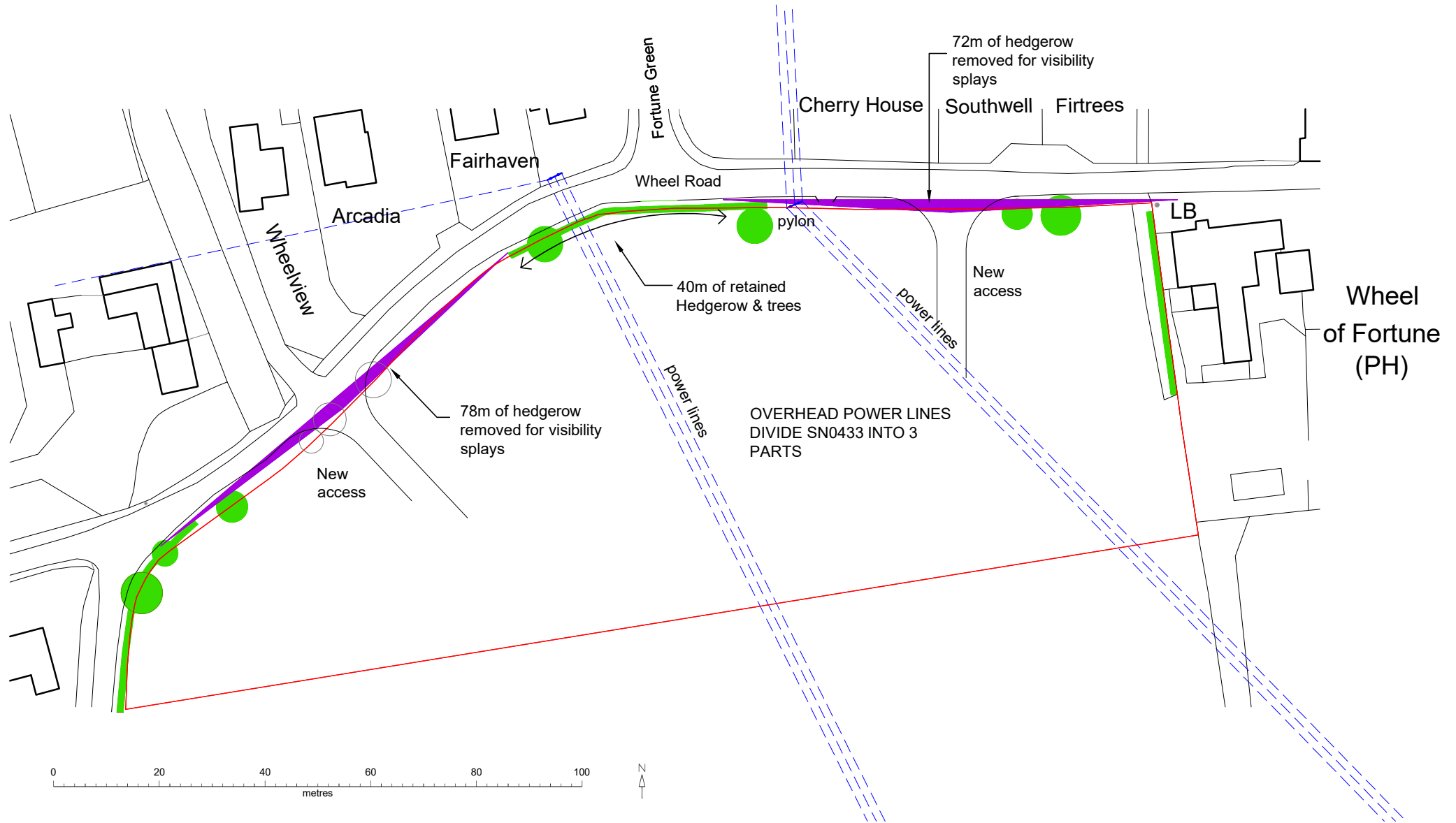
The suitability and potential of site SNO433 to deliver high dwelling numbers appears to be promoted within the VCHAP process whereas concerns for the viability and impact of the development on the character of the area appear to be relegated.

Document prepared by Jason See 05/02/2024



PLAN 1

SN0433
EXISTING SITE PLAN
SCALE 1:1000 (A4)

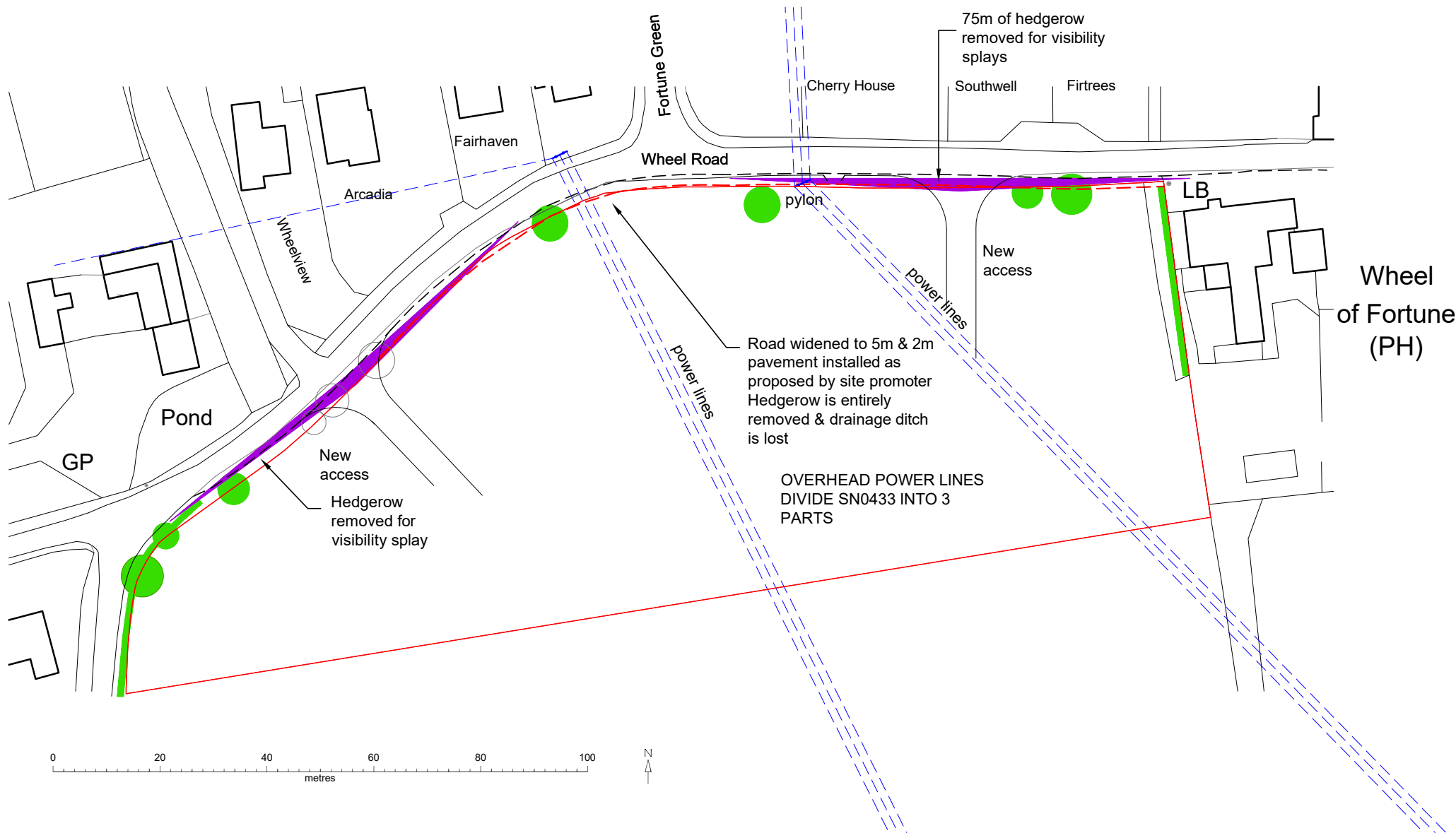


KEY

- 43m visibility splay (hedgerow removed). Standard requirement for traffic @ approx' 30mph. Matching highways requirement for completed development East of the Wheel of Fortune
- Hedgerow & drainage ditch
-

PLAN 2

SN0433
SITE PLAN SHOWING PROPOSED SITE ACCESS
(NO ROAD WIDENING OR PAVEMENT)
SCALE 1:1000 (A4)



KEY

- 43m visibility splay (hedgerow removed). Standard requirement for traffic @ approx' 30mph. Matching highways requirement for completed development East of the Wheel of Fortune
- Hedgerow & drainage ditch
- New kerb
- New back of 2m pavement

PLAN 3

SN0433

SITE PLAN SHOWING PROPOSED SITE ACCESS
ROAD WIDENED & 2M PAVEMENT
SCALE 1:1000 (A4)