

Date: 5th February 2024
Our ref: 1637

Mr S Marjoram
Planning Policy Manager
Broadland District and South Norfolk Council
Horizon Business Centre
Peachman Way
Norwich
NR7 0WF

By email only

Dear Simon,

Re: Representations submitted to re-run *Regulation 18 Village Cluster Housing Allocations Plan – Alternative Sites and Focused Changes* submitted on Behalf of Silfield Ltd and Mr Robert Alston

I refer to the above consultation regarding your Council's new focused consultation in respect of the additional 13 no. housing sites selected by your Council as having the potential to make up the acknowledged shortfall in housing numbers being delivered through the Village Cluster Housing Allocations Plan. I understand that this new consultation is required as a result of your Council selecting undeliverable sites at the earlier Draft Regulation 18 stage.

This representation relates to my client Silfield Ltd's site off Back Lane, Barford, already assigned the reference SNO552RevC by your Council, that would extend the Council's preferred emerging housing allocation VCBAR1 westwards. Your Council is aware that my client is promoting this site along with a related public benefits package including: the delivery of a large area of publicly accessible semi-natural open space in the form of a new Country Park that is included to meet a shortfall in this type of space; highway improvements to the junction of Back Lane and the B1108 Watton Road; and flood mitigation measures to prevent the flooding that occurs on the road surface along the B1108 Watton Road.

You will be aware that my client's SNO552RevC site is already identified in the Village Cluster Housing Allocations Plan as a *Reasonable Alternative* site to accommodate future planned housing growth. As such the Back Lane site has already been assessed as a good location to meet the identified shortfall in housing numbers in the Village Cluster Housing Allocations Plan.

To confirm my client's Back Lane site and the related Country Park site off the B1108 Watton Road are wholly owned by Silfield Ltd and can be released from agricultural production and delivered immediately to meet new housing needs. I would state that this is not the case for the alternative site SN6000 located off Chapel Street, Barford that is also being considered as part of the current re-run Regulation 18 consultation.

My client would question the deliverability and effectiveness of the Chapel Street site as the land is currently being used as a Village Hall and public recreation ground; is subject to a long 38-year lease for this current use; and is also registered with the Charity Commission for England and Wales. As such the release of this alternative site, that is also not yet considered a Reasonable Alternative, for new housing would require the termination of the existing lease, and the consent of the Commission. I would suggest that this would not be forthcoming without appropriate re-provision and compensation. It is also clear that without appropriate and equivalent re-provision (that could not be achieved on the back of 25-30 dwellings including affordable housing as suggested) onto an alternative site, that Sport England as a Statutory Consultee would also object to the release of this site for housing.

For all the above reasons it is clear that the SNO552RevC site being promoted by Silfield is the only credible and deliverable site in Barford to accommodate the additional unmet housing need required under the Village Cluster Housing Allocations Plan.

I trust all the above is clear and that my clients Preferred Alternative site is allocated in the submission version of the Village Cluster Housing Allocations Plan in due course.

Yours sincerely,

Philip Atkinson

Director

cc.

Mr R Alston, Silfield Ltd.

