

Representations to SNC VCHAP Regulation 18 Alternative Sites & Focused Changes Consultation

Project:	Stocks Hill, Bawburgh	Job no:	9000012
Client:	Crocus Homes	Date:	5th Feb 2024

1.0 Introduction

- 1.1 On behalf of our client, Crocus Homes, we wish to make representations to support the revised allocation VC BAW1 REV in respect of land to the east of Stocks Hill, Bawburgh. Crocus Homes are intending to deliver this site as developer after having entered into agreement with the landowner.
- 1.2 The revision proposed through this focused Regulation 18 consultation seeks a revised allocation site boundary in order to facilitate a reduced density of up to 35 dwellings on an area of 1.9ha. Our client agrees fully with this proposal and considers that it would further support the deliverability of the site, ensuring it will make a valuable and high-quality contribution to the housing land supply requirements within the Plan period.
- 1.3 Our client agrees entirely with the proposed revision and wishes to provide further support and clarity in response to this consultation.
- 1.4 This representation aims to provide additional detail relating to the further site opportunities arising as a result of this proposed amendment. This representation also considers relevant sections of the evidence base that supports this consultation, including the updated Interim Sustainability Appraisal, Landscape Visual Appraisals and Site Assessment Booklets.

2.0 Site Opportunities

- 2.1 It has already been established that the site is in a sustainable location, within a village with excellent accessibility to rural services and facilities, as well as an existing footpath adjacent to the site. There are no changes to the proposed allocation policy, nor any uplift in the number of dwellings to be delivered, and therefore the principle of the allocation site remains acceptable.
- 2.2 The revised site boundary does, however, provide some additional opportunities to improve the quality of future development on the allocation site.
- 2.3 The increased site area will result in an overall lower density development, which is considered to be more in keeping with character of the local area and the village setting. Based on the entire site area, the density would now be approximately 18dph, as opposed to 25dph as per the previously preferred allocation site. Indeed, this revised density is more comparable to other VCHAP allocations in similar villages.
- 2.4 In turn, this looser density will provide more opportunity for the form and layout of development to be more sympathetic to the local landscape character. As confirmed in the updated Landscape Visual

Appraisal, development of the site based on the increased site area “*would not significantly encroach into the open countryside landscape*” and therefore, in our view, this revised boundary will only assist in providing flexibility to minimise impacts on the Southern Bypass Landscape Protection Zone, the River Valley landscape designation and the Conservation Area.

- 2.5 Under the previously proposed density of 25dph, the mix of units that were able to be accommodated did have its limitations. For example, opportunities to provide larger family homes and bungalows, which require a much larger footprint, were constrained. The proposed revision to the site area increases the ability for a wider range of units and dwelling mix to be accommodated in consideration of local needs.
- 2.6 In regard to open space, the increased site area will ensure that open space and green infrastructure can be delivered in accordance with policy requirements.
- 2.7 The site investigations that have been carried out to date confirm that the site can benefit from a drainage strategy that incorporates a full SuDS solution. In addition, adoptable standard roads will need to be provided within the development site due to the number of homes being accessed. The increased site area resulting from this boundary change will provide further flexibility in our client’s discussions with the LLFA and the Highways Authority to ensure the development delivers appropriate infrastructure.
- 2.8 The impacts arising from the extended boundary are considered to be negligible. This is confirmed in the updated Sustainability Appraisal which states that this revision would result in “*no significant implications for accessibility objections*” and the updated Site Assessment which states that the increased site area would “*minimise the visual impact of the site on the landscape and Conservation Area and be more in keeping with the village location*”. The allocation site would still provide a logical extension to the built environment of the village.

3.0 Deliverability

- 3.1 The definition of a site being ‘deliverable’, for the purposes of sites for housing, is set out in Annex 2 of the National Planning Policy Framework (2023). In order to meet the standard of being considered deliverable, sites should be suitable, available and achievable. The revised site is assessed against these three tests below.

Suitable

- 3.2 As concluded in the updated Sustainability Appraisal and the updated Site Assessment, in accordance with the HELAA Methodology, the revised site area is considered suitable for the proposed development of up to 35 dwellings, as originally envisaged.

Available

- 3.3 The entire amended site boundary has been made available to our client from the landowner via option agreement. There are no known legal constraints in respect of the Title that would restrict future development for residential purposes.
- 3.4 Both the landowner and our client support this representation to make the land available for the stipulated development within the Plan period. Our client considers that housing could realistically be delivered early in the Plan period and within five years.

Achievable

- 3.5 In order to be achievable, there must be a realistic prospect that development will be delivered on the site. As previously established through earlier VCHAP consultations, there are no known physical, legal or planning constraints that would prevent development of this site. The proposed boundary revision only serves to increase the likelihood of the site being achievable in the most appropriate manner for this village location.
- 3.6 Our client is a local developer with a strong reputation for delivering high quality homes. Their long-running track record on delivery is excellent and the quality and finish of the homes that they deliver is above the level ordinarily expected of new build properties.
- 3.7 Since the last VCHAP consultation, our client has begun a significant amount of work for their own due diligence and to inform a future planning application for the site. This work has included additional site investigations, an arboricultural survey, ecological surveys and archaeological investigations. A full design team has been instructed to begin preparing detailed proposals, including architects, engineers and landscape architects. In addition, our client has commenced engagement with the Parish Council and local community on early proposals and site concepts.
- 3.8 Through initial discussions with the Housing Enabling Officer, it is acknowledged that there would be a need to provide 12 affordable dwellings as part of the development of the site. Our client acknowledges this requirement and based on the site investigations conducted to date, considers it achievable and viable.
- 3.9 As evidenced by entering into legal agreements, undertaking initial site assessments and design work, engagement with the local community and submitting this representation, our client, the developer, has demonstrated a clear desire to ensure that the site potential envisioned by this proposed allocation is achieved. It is anticipated that a full planning application will be submitted at the earliest opportunity to secure delivery of this site early within the Plan period.

4.0 Conclusion

- 4.1 The site is well related to the existing settlement, providing a logical and sustainable extension to the village. The early investigations and design work carried out by our client has confirmed that the

development, on the increased site area, could be delivered harmoniously to create an attractive and suitable housing development site for the village.

- 4.2 There are no material planning considerations that would render the boundary revision unacceptable. Indeed, the evidence base for this Regulation 18 consultation confirms that the site area alteration will result in a preferred position and minimise impacts of the development overall.
- 4.3 In conclusion, the site remains suitable, available and achievable, both within the Plan period and within the next five years. Indeed, the proposed alteration to the allocation area only supports the deliverability of the site. Accordingly, the standard tests of deliverability as set out in the NPPF are met and the site should continue to remain preferred for allocation within the South Norfolk Village Clusters Housing Allocations Plan for 35 dwellings on a revised site area of approximately 1.9 hectares.