

**South Norfolk Village Clusters Housing Allocations
Plan (VCHAP) Regulation 18 Consultation on
Alternative Sites and Focused Changes**

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South Norfolk Village Clusters Housing Allocations Plan (VCHAP) Regulation 18 Consultation on Alternative Sites and Focused Changes

The following representations question the process used in determining the Alternative/Shortlisted Sites and Focused Changes Proposals contained in the Regulation 18 Consultation.

In an attempt to keep this response as short as possible I submitted 3 sites for consideration during the Call of Sites and initial Reg 18 and 19 sites during the initial call for sites in the village of Barnham Broom Site Reference SN 0174, SN 0196 and SN 5057.

I am instructed to advise you that SN 0196 is no longer available at this juncture for development.

During the Assessment period the SN 0174 and SN 5057 were not considered to be Favoured Sites but stated as being Shortlisted Sites at the **Regulation 18 Consultation on Alternative Sites and Focused Changes at the South Norfolk Stronger, Greener Economy Policy Committee meeting of 23 November 2023.**

Within the consultation SN 0174 and SN 5057 fall under to heading Regulation 19 Shortlisted Sites.

The reasons for not including SN0174 and SN 5057 as Favoured Sites is given as:

SN5057	Land south of Bankside Way, Barnham Broom	0.58	12	Would be dependent on VC BB1 to deliver the improvements to the Bell Road/Norwich Road junction, and also needs to be able to demonstrate access to Bell Road is possible with the change in levels at the site frontage.
SN0174	Land off Bell Road, Barnham Broom	1.97	50	Would be dependent on VC BB1 to deliver the improvements to the Bell Road/Norwich Road junction. Potential landscape constraints, plus loss of hedgerow if developed alongside adjacent SN0196

Having stated that site VC BB1 is a Favoured Site it follows that both SN 0174 and SN 5057 are acceptable from an access viewpoint. SN 1074 is not constrained in any way, it has direct access off Bankside Way an adopted road. The suggestion that SN 5057 is constrained due to the change in levels at the site frontage is a fallacy, the change in levels will require nothing more that some very simple earthworks.

Finally, the AECOM SA provides an insight on existing shortlisted omission sites:

“The final port of call is the list of existing shortlisted omission sites. These are omission sites that were given close consideration over the course of plan-making prior to January 2023. Presenting shortlisted omission sites was a key focus of the consultation at the Regulation 18 stage, and the status of a site as shortlisted was a consideration as part of the process of defining reasonable alternatives within both the Interim SA Report and the SA Report.

There are a total of 32 shortlisted omission sites, and the majority are rejected by officers at the current time for clear cut reasons. In most instances sites are rejected due to site specific issues/constraints. However, in a small number of cases reasons for rejection include strategic considerations relating to accessibility. This is most notably the case for SN4048SL at Hapton (previously a preferred site), with officers' reasons for rejection as follows: *"... services in the village are very limited and the nature of the cluster means that the site is more likely to be reliant on services/facilities in Long Stratton (which already has substantial strategic growth allocated), as such it would not be supporting local, rural services, as envisaged by the Village Clusters document."*

Looking across the list of rejected sites, the only point to note is three rejected sites at Little Melton which, as discussed above, is flagged within the SA Report as a settlement that could potentially be suited to higher growth from an accessibility perspective, given very good accessibility to Norwich. There are three shortlisted omission sites that could feasibly be allocated, in addition to the feasible option of boosting supply via an increased density at the one proposed allocation. Of these three sites, attention focuses on SN4025, which was a proposed allocation at the Regulation 18 stage. However, flood risk is a constraint to access, and it is generally the case that there are no identified village-specific opportunities to be realised by supporting modest higher growth (beyond new homes).

In conclusion, a total of 13 sites / site-specific options are taken forward for further detailed consideration in Section 4. **This shortlist of sites was selected by officers on the basis of clear reasoning, and it is not the aim of this report to call the shortlist into question** (my emphasis). However, presented above is a discussion that essentially aims to flag a small number of rejected sites / site-specific options which potentially have a degree of merit from an accessibility perspective. Rejected sites could feasibly be re-considered subsequent to the current consultation (recognising that there is scope to make changes to plans between the Regulation 18 and 19 stages)."

The conclusion I must reach is that the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) Regulation 18 Consultation on Alternative Sites and Focused Changes is flawed by failing to consider Shortlisted Sites that are of equal standing to Favoured Sites.

For the reasons set out above my client requests full up-to-date consideration is given to including both SN 0174 and SN 5057 in the final version of the Regulation19 proposal.

End