

Our Ref: CC/Local Plan

25 August 2024

South Norfolk Council
Horizon Business Centre,
Peachman Way,
Norwich
NR7 0WF

Mr AFR Collins

Dear Sirs

South Norfolk Village Clusters Housing Allocations Plan Regulation 19 'Pre-Submission Addendum' - Consultation

I refer to the above consultation. I refer to my previous representations submitted on the emerging Local plan, and particularly those submitted on 26 January 2024. I note the limited nature of the changes proposed under this consultation. Therefore, this letter of further representations should be read in conjunction with all previous representations.

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 1,200 minimum residential units as set out in the Plan is no longer a requirement. The new approach is to calculate housing need based on an "**advisory starting point**" which can allow for an increase or decrease in numbers depending upon circumstances. Therefore, the assumption the plan must provide at least 1,200 units is no longer correct and there is no basis for a buffer of 130 extra houses. This could lead to an oversupply, particularly in the short term. Although the new Government is consulting on changes to housing supply, there is no certainty that those changes will be embedded in an updated NPPF. The starting point for a site's capacity must be driven by each proposed site's ability to accommodate residential development. This approach requires a proper consideration of the planning factors affecting each site and not some arbitrary housing density. No full and proper assessment has been undertaken for the proposed Bawburgh site (VC BAW1REC).

Bawburgh Parish Council has considered the ability of the site (VC BAW1REV) to accommodate new housing and concluded that the site should not accommodate more than 15 units – resolution of the Council on 8 August 2024.

Proposed Allocation VC BAW1REC

I turn now to the proposed changes under the Regulation 19 Addendum consultation:

At paragraph 2.3, the Council acknowledges that Bawburgh does not have a range of facilities and is not part of a village cluster. It is a village that stands in isolation from other villages in the district. It also accepts there is a severely limited bus service with just one bus to Wymondham and back three times per week (Monday, Wednesday, and Friday), when it does run. No evidence has been provided of an “on-demand service” for the village as claimed by the District Council.

At paragraph 2.5 there is a suggestion that a footpath link could be provided between the site and the primary school with a new rear entrance. Such an access is unlikely to be supported by the police on health & safety grounds given its location and remoteness. A new footpath would need to be lit during winter to ensure safety of pupils. There is no indication of how such a footpath would be maintained, with such a proposal most likely to be unacceptable to the residents’ management company for the site. Therefore, it would require either the landowner or highway authority to maintain – there does not seem to be evidence of any such consultation or commitment to such a path.

At paragraph 2.11, the site is proposed to be increased from 1.4 hectares to 1.97 hectares (an increase of 41% to reflect a lower density in the village). The most recent development adjacent to the Village Hall was developed at 9 units per hectare and the new site is now promoted at 18 units per hectare – twice that previously approved. A development of 15 units could be achieved in the original 1.4 hectares at the previously approved density.

The Council has not conducted any further site assessment to support an increase in site size of 41%. The original site assessment was flawed and remains so. No sustainability assessment has been undertaken on the enlarged site. No agricultural land quality assessment has been undertaken to justify the loss of 1.9 hectares of Grade 3A agricultural land. The NPPF at footnote 62 confirms that lesser quality land should be used in preference to Best and Most Versatile agricultural land.

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 or reduced to no more than 15 units as a proposed allocation on the basis it is not sound.

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

Yours faithfully

Tony Collins

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