

South Norfolk Local Plan
South Norfolk Village Clusters, Housing
Allocations Plan.
Regulation 19 Consultation
Representations on Broome.

September 2024



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South Norfolk Village Clusters, Housing Allocations Plan
Regulation 19 Consultation
Representations on Broome
Client: Ditchingham Farms Partnership

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1.0 Introduction and Summary

1.1 These representations have been made on behalf of the Ditchingham Farms Partnership in response to the current consultation '*South Norfolk Village Cluster Housing Allocations Plan (VCHAP) Pre-submission Addendum*' which is out for Regulation 19 Consultation until 7th October 2024.

1.2 The South Norfolk Village Cluster Housing Allocations Plan (VCHAP) Pre-submission Addendum has been published by South Norfolk Council, before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended, (PCPA 2004) sets out that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate and 'soundness'.

1.3 The tests of soundness are set out in Paragraph 35 of the National Planning Policy Framework (NPPF). Plans are to be considered sound where they can be demonstrated to be:

- **Positively prepared** – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

1.4 This submission Objects to the Allocation of Site VCBROM1, located on the north eastern periphery of Broome, on the basis that it is not justified (in view of a more sustainable alternative) and, on the basis that there is a more sustainable alternative, the allocation is not consistent with national planning policy which sets a presumption in favour of sustainable development. We also have concerns that certain elements of

the policy will not be effective. As such, we consider that the policy and the allocation will not meet the 'test of soundness'.

- 1.5 We consider that the proposed allocation is not the most sustainable option (meaning that it is unjustified and inconsistent with national planning policy) because this site will further extend the 'ribbon development' of the settlement, which has a harmful effect on the character of the countryside. Being located at the furthest extremity of the settlement, this site is remote from the nearest facilities in nearby Ditchingham and does not offer the most sustainable site for development within the village. Since Broome has been found to be a suitable location for a small housing allocation, we consider that there are more suitable sites which should be allocated in preference to this site.
- 1.6 As previous representations have stated, we continue to consider that the site with the Local Planning Authority (LPA) reference **SN0346** in the Ditchingham and Broome Cluster would be a more sustainable allocation and we object to this site having been discounted without sufficient justification in favour of a less sustainable alternative. We do not consider that this is a decision which should be found to be 'sound'. Site SN0346 was put forward initially in 2021. Clearly, site SN0346 is more central in the village of Broome and is well related to the built-up area. Moreover, the development of site SN0346 would be less harmful to the character of the open countryside. Site SN0346 is more sustainable than the draft allocation site, since it is closer to facilities such as shops, bus services, and the Primary School.
- 1.7 We consider that allocating site SN0346 as an alternative to site VCBROM1 would be more justified and more consistent with national policy, and therefore it would be a 'sunder' decision.
- 1.8 However, should the LPA wish to continue with the allocation of VCBROM1, allocating site SN0346 in addition to the proposed allocation would offer a solution that could be more justified. We consider that allocating both sites would be an example of the plan being 'Positively Prepared' (as required by national guidance) when assessed against the Greater Norwich Local Plans current '*minimum 1,200*' village cluster housing requirement for the area. Allocating an additional site would make the plan more flexible and could also be argued as taking an approach of 'positively preparing' the Local Plan in light of the new government's clear commitment to rapidly increase housing delivery. NPPF requires plans to consider current needs, but also the

possibility of changes to housing need in the future.

- 1.9 Whilst the Greater Norwich Local Plan provides a '*minimum*' housing requirement for the area of 1,200 homes, there is reason to conclude that this figure will increase, and therefore that the minimum requirement, should be treated as such (i.e., more housing land could be provided for). Rather than only allocating the minimum amount of housing land, a more flexible approach should be applied in view of the likely nationally imposed increases to housing targets. It is important that a range of sizes and types of sites are provided to deliver a range of housing and to support local house builders, and this would be important whether or not housing targets are increased. As such, allocating more land than is required by the minimum housing targets would be a sound approach.
- 1.10 Site SN0346 fronts the Old Yarmouth Road in Broome and is more central than the proposed allocation site. It would make a much more sustainable local plan allocation. The site is very well related to existing homes and is used for arable farming. The very small size of the fields makes the land less suitable for arable cropping than larger fields, so its value as farmland is limited. In recent years the farm has planted two areas of woodland within the site and these will mature into attractive areas of landscaping. Homes would be developed in three arable parcels either side of these areas of woodland. A similar development has successfully taken place a short distance to the west on the northern side of Old Yarmouth Road. The site could provide three small parcels of land which would deliver around three to five homes on each parcel. This would make the sites attractive to local housebuilders which would support the local economy and broaden the size of sites available in the local area.
- 1.11 These representations further address the deficiencies of the proposed allocation reference VCBROM1, and then assess the alternative site in Broome.



Figure 1: Plan of Facilities

1.12 The above aerial photo shows the locations referred to in Ditchingham and Broome. The area outlined in red is the Council's preferred allocation (reference VCBROM1), where as the better located area (outlined in blue) is site SN0346, which these representations advocate should be the preferred allocation. Point A is the nearest bus service, point B is the village shop and point C is Ditchingham Church of England Primary Academy.

2.0 Assessment of Site Reference VCBROM1

2.1 The site reference VCBROM1 (land west of Old Yarmouth Road) is a 0.62ha area of land allocated for twelve dwellings in the Regulation 19 Consultation. The site is on the periphery of the village of Broome as shown on the proposals map below:

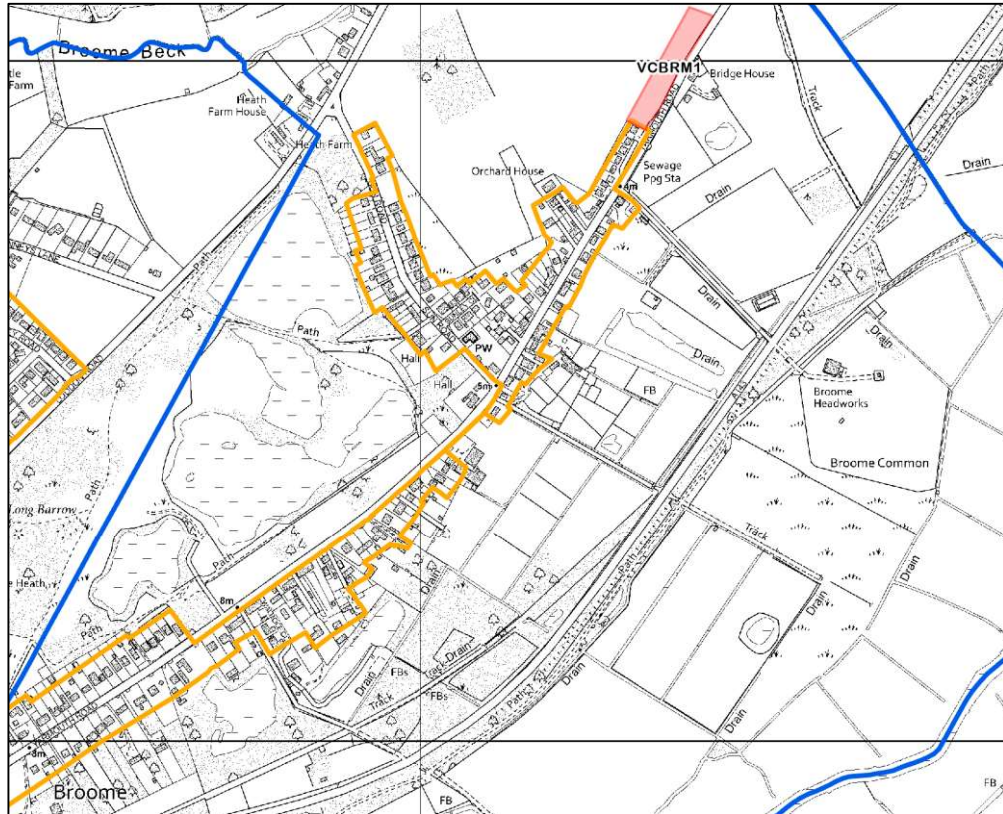


Figure 2.1: Proposals Map, Broome (Reg 19)

2.2 The village is a linear settlement extending for almost a mile along the Old Yarmouth Road. The village connects with Ditchingham in the west, and extends into countryside in the east. The allocation is an extension to the eastern most houses, and extends well beyond any continuous line of homes into the countryside. The development could be characterised as ‘ribbon development.’ This type of development has traditionally been avoided by the planning system when planning new developments. The reason is that the character of the countryside should be protected and ribbon development extends building into the countryside, unlike a cluster of development or other development better related to a built-up area.

2.3 The proposed policy states:

Policy VC BRM1 – Land west of Old Yarmouth Road, Broome

0.62ha of land is allocated for at least 12 dwellings.

The developer of the site is required to ensure:

- **Highways improvement works to include widening of the existing frontage footpath along Old Yarmouth Road, as well as speed limiting measures as required by the Highways Authority;**
- **Frontage development to Old Yarmouth Road only with development to be of a form and character that is consistent with the surrounding area;**
- **Landscaping of the boundaries with the open countryside to successfully contain the impact of development and integrate the site into the wider countryside;**
- **A site-specific Flood Risk Assessment (FRA) and strategy, to inform the layout of the site, which has regard to the requirements of the Stage 2 VC Strategic Flood Risk Assessment;**
- **Early engagement with Anglian Water (AW) to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network; and**
- **Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development.**

2.4 We assess this policy below against the required NPPF tests of soundness, to demonstrate that the policy is unsound, since it proposes an unsound allocation.

The Proposed Policy is Unsound because it will be 'Ineffective' at Preventing a Harmful Visual Impact

2.5 The policy seeks to prevent a harmful impact on the countryside, setting a requirement that:

'Landscaping of the boundaries with the open countryside to successfully contain the impact of development and integrate the site into the wider countryside'.

2.6 The character of the countryside to the east of Broome is of an undeveloped rural area with scattered buildings. Extending a line of homes into this area would harm that rural character, with the proposed policy requiring a consideration of the impact of development and its integration into the wider countryside.

2.7 The proposed policy, as set out in the Consultation Document, acknowledges the difficulty of developing in this area and requires the development to be 'integrated' into the countryside. However, we have assessed the site and consider that since the

site already has limited boundary features, any proposed development (including the introduction of boundary features and planting) will have a significant visual impact, such that 'integration into the wider countryside' is not possible. On any measure, it is clear that development in this location will have a significant visual impact, and we consider that the policy is written to be **ineffective** since it will require a landscape outcome which cannot be achieved in this location.



Figure 2.2: View of the Proposed Allocation

2.8 Public views are available toward the proposed allocation site from PROW Broome FP5, and since the landscape is flat, with no existing vegetation, it is unclear how the LPA propose any application could effectively mitigate the impact of development on this landscape, such that the development could be said to have been 'integrated'.

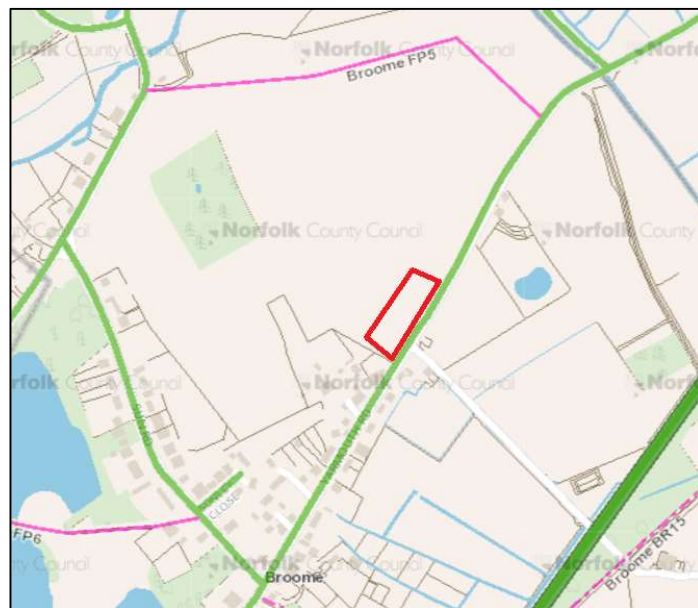


Figure 2.3: PROW Map and Allocation Site

- 2.9 The supporting text to the draft policy references an LVA submitted with the proposed allocation, without suggesting how the landscape impact of the proposal could actually be mitigated:

‘The Landscape and Visual Appraisal (LVA) notes the need for careful design and landscaping to create both a gateway into the village from the north and to integrate the site into the surrounding countryside. To the north and the west of the site there is an open landscape with no existing screening and this aspect will be visible from nearby footpath Broome FP5. As such, careful consideration will need to be given to the open aspects of the site to ensure it is successfully contained within the wider landscape’.

- 2.10 Whilst reference is made to the creation of a ‘gateway’ to Broome, it is not clear what this means; or indeed, whether a ‘gateway’ is appropriate in this landscape context for a settlement of this size. The development is unlikely to be more than one house deep fronting the road, and as previously advised in our earlier representations, we maintain that this creates difficulty in creating a built gateway feature as the scope for development is limited.

- 2.11 We do not consider that a landscape buffer is appropriate, because the introduction of new landscaping itself would represent a significant change in this open landscape. Practically, the scope for landscaping is also very limited. Unlike any larger site, on a smaller site, landscaping is likely to be the responsibility of, or in the control of, individual householders. This makes it more difficult to maintain landscaping in the long term. For example, a home owner in a few years may want to reduce the amount of landscaping to take advantage of views over the countryside. Landscaping to mitigate the impact of development can be delivered better on larger sites which have open areas containing landscaping which would be managed separately to the homes. On smaller sites small areas of landscaping will have less impact and be more prone to removal. One only has to look at the most recent addition to Broome (which this allocation would adjoin) to see that the landscape visual impacts are likely to be significant, with limited opportunities for landscaping to provide any meaningful ‘integration’.



Figure 2.4: Recent Housing Development Adjacent to Allocation Site

- 2.12 For all of the above reasons, we consider that the landscaping clause (necessary to make this allocation acceptable) will be ineffective and in the long term any solution will be likely to fail.

The Proposed Policy is Unsound because it will be 'Ineffective' as it Requires Unnecessary Additional Traffic Calming Measures

- 2.13 It is also stated in the Regulation 19 Consultation that the development would be required to deliver additional traffic calming features. The creation of traffic calming features is unnecessary as traffic calming is already in place in the road next to the allocation. There are two traffic islands which force traffic onto a single carriageway road as shown in the photograph below. More traffic calming in the locality would be unnecessary and ineffective.



Figure 2.5: Traffic Calming Measure in place

The Proposed Policy is Unsound because it will be 'Inconsistent with National Planning Policy' as it Proposes an Unsustainable Development Site and Does Not Protect the Countryside

- 2.14 Proposed allocation site VCBROM1 (land west of Old Yarmouth Road) is a long distance from facilities compared to alternative development opportunities, so is not sustainable. This is inconsistent with the NPPF which requires at paragraph 11:

'Plans and decisions should apply a presumption in favour of sustainable development.'

For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects'.

- 2.15 Paragraph 74 provides guidance on allocating land for housing, stating that:

'The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)'.

- 2.16 We do not consider that this extension to Broome will meet this expectation and will therefore be inconsistent with national policy. Broome has a pub but no other facilities. Ditchingham to the west, has a convenience store, primary school, and bus services. A good range of facilities are available to the south in Bungay. The proposed allocation is, as far as it could be, in Broome from the facilities in Ditchingham and Bungay. This will not encourage sustainable forms of travel such as walking, cycling and public transport and will not ensure that the village extension complies with Paragraph 74 of the NPPF.

- 2.17 Site VCBROM1 would also not meet the requirements of National Planning Policy as contained in the National Planning Policy Framework (NPPF). Paragraph 180(b) states that: *'Planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside'.* By proposing a linear form of ribbon development into open countryside with little

scope for meaningful landscaping (as explained above), the development will appear out of character with the local area.

2.18 Paragraph 104 of the NPPF states *'transport issues should be considered from the earliest stages of plan-making and development proposals, so that opportunities to promote walking, cycling and public transport use are identified and pursued'*. If taking opportunities for walking, cycling, and public transport was considered, then sites to the west of Broome, which are closer to facilities, would be favoured over the proposed allocation site.

2.19 The allocation of site VCBROM1 would not meet the requirements of National Planning Policy and would therefore not contribute to creating a *'sound'* Local Plan. The proposed policy is considered to be *'ineffective'* in respect of landscaping and transport measures. Furthermore, the allocation would not be *'justified'* by being the most appropriate alternative, as the next chapter will demonstrate.

3.0 Development Potential of Site Reference SN0346

- 3.1 We have previously made representations in support of the allocation of site SN0346, which we maintain is a more sustainable development option, which would ensure that the plan would be in conformity with the NFFP, would be effective and could deliver a justifiable allocation. For a plan to be considered sound, the NPPF requires that it is 'justified', which means that the plan proposes '*an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence*'.
- 3.2 We do not consider that the allocation of site VCBROM1 is justified, since it is not an appropriate strategy in view of a reasonable alternative, which (on the evidence) clearly offers a more sustainable and a less harmful allocation to deliver the housing growth required in Broome.
- 3.3 Site SN0346 is better related to facilities and transport links than the proposed allocation in the Regulation 19 Consultation reference VCBROM1, as it is better related to the built-up area of the village. We set out our reasons for considering that site SN0346 is preferable to site VCBROM1 below.

Alternative Housing Allocation - SN0346

- 3.4 Site SN0346 is an area of land alongside the northern edge of the Old Yarmouth Road. It is approximately 1.8 hectares in size, meaning that it offers greater opportunities for landscaping, biodiversity net gain and (if required) a larger number of houses, as the housing need responds to changing Government Policy. The site comprises five areas of land, being three areas of arable land at the eastern and western ends, and centrally in the site. Between these three areas of land are two areas of recently planted woodland which would be retained to provide advanced landscaping within the development.
- 3.5 To the south of the site are homes which stretch along the Old Yarmouth Road. There is a footway along the south side of Old Yarmouth Road which runs the length of the site and extends east and west to the rest of the village. To the east of the site is a small open yard with houses further east. To the west of the site is the access to Broome Pits which are fishing lakes. To the east of this is a small area of trees with new houses beyond. To the north of the site is Broome Pits fishing lakes.



Figure 3.1: Site Location

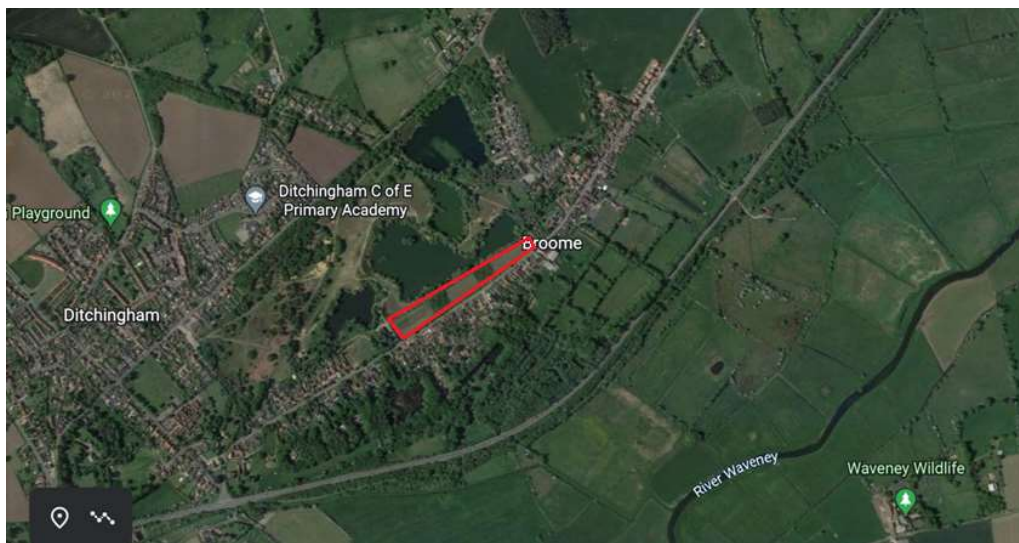


Figure 3.2: Site Context

- 3.6 The site is well related to the built-up area of the village. There is continuous housing to the south, east, and west. New homes in this area will be seen in the context of a large number of existing homes and the development would therefore not harm the character of the built-up area.
- 3.7 The site is flat and free from constraints and has a straight road frontage along the Old Yarmouth Road. There is good visibility along the road in either direction, so appropriate vehicular and pedestrian accesses could be provided along the road

frontage. There is a pedestrian footway on the southern side of Old Yarmouth Road. Any new homes would be provided with pedestrian access along their frontages and residents could cross to the footway on the south side of Old Yarmouth Road to gain access to facilities in other parts of Broome.

3.8 The site is sustainably located within the village. The main facilities in the area are in Ditchingham to the north and west, and in Bungay to the south. These services include a convenience store, primary school, and bus services in Ditchingham. The stores and bus services are around half a mile away, the primary school is around three quarters of a mile away. The distances to these facilities are shorter if a more direct route is taken through the Heath to the north. These are the principal services in the immediate area and are accessible by walking and cycling. A wider range of services is available in Bungay a short distance to the south.

3.9 The CrashMap website shows that there have been no accidents along the site frontage which would constrain development.

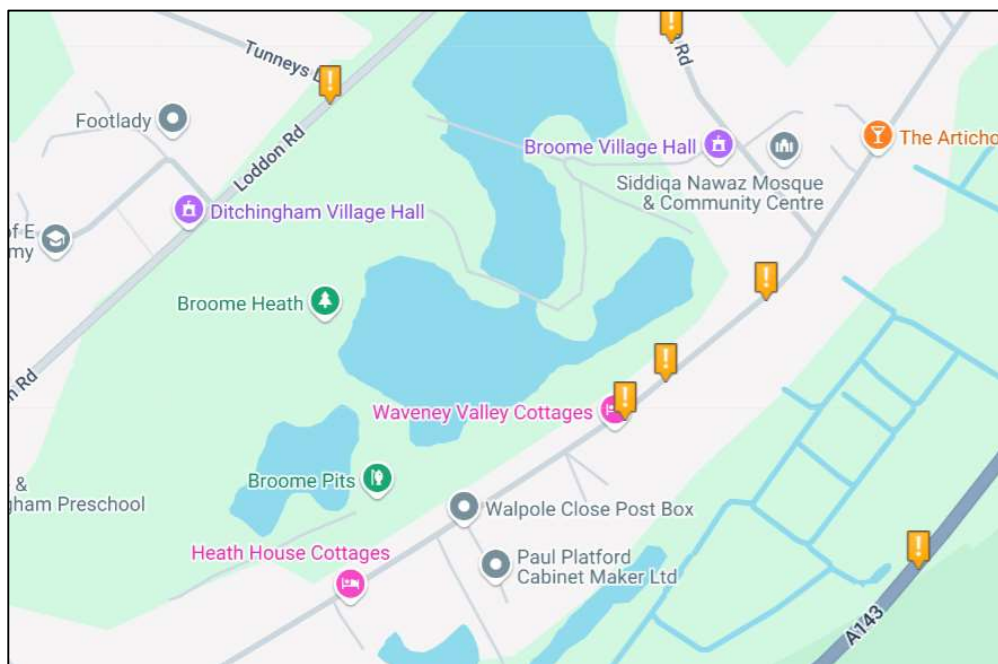


Figure 3.3: CrashMap (last 24 years)

3.10 There are no Listed Buildings or Conservation Areas in the vicinity of the site. There are Two Scheduled Ancient Monuments north of the site, and any development can be preceded by an archaeological investigation if required. There are no trees subject to Tree Preservation Orders on the site.

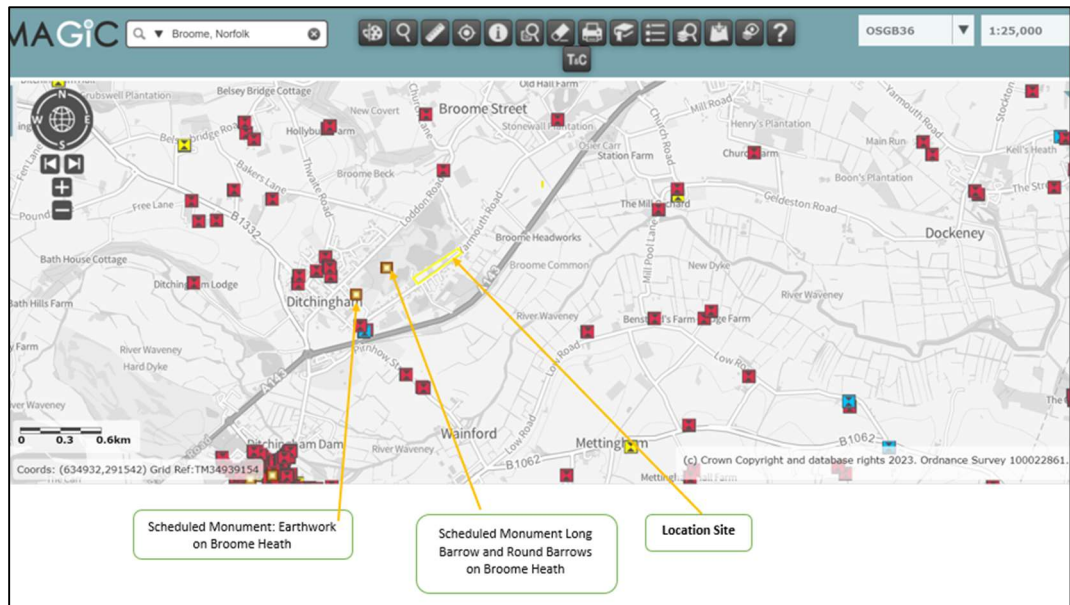


Figure 3.4: Listed Buildings and Scheduled Monuments

3.11 The site is fully within the Environment Agency Flood Zone 1 so is suitable for housing.

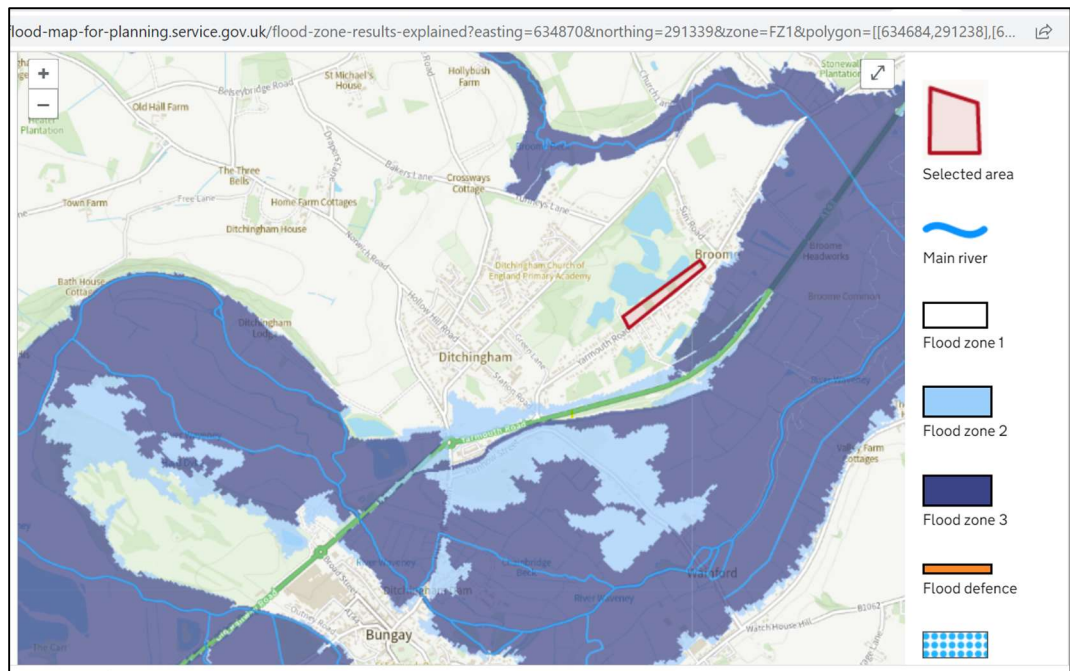


Figure 3.5: Flood Zone Map

3.12 The site is adjacent to the village’s settlement boundary, but not at an extremity. It will offer an infill development which is well related to the rest of the settlement. Existing homes extend along the southern edge of the site along the south of Old Yarmouth Road. There are also homes to the east and west of the site on the northern side of Old Yarmouth Road. Development on the site would complement the linear

village character of Broome.

- 3.13 A housing allocation was developed in a similar location to the north of Old Yarmouth Road, to the west of this site, by planning application 2016/2689. This permitted five homes and has been recently developed as shown below. The evidence demonstrates how well this development has been integrated into the landscape (compared with the recently completed development adjacent to the proposed allocation site). Similar small scale housing developments could be developed on some, or all, of the three parcels of land making up this site, between the two areas of new woodland planting.



Figure 3.6: Location of 2016/2689 Five Homes Site (before development)



Figure 3.7: Location of 2016/2689 Five Homes Site (after development)



Figure 3.8: Successful Integration of Development 2016/2689

- 3.14 Although site SN0346 is part of a designated Local Nature Reserve, we do not consider that this presents any constraint to development. The three parcels of land which could be allocated are actually in arable use so this designation does not significantly contribute to local ecology. The allocation as a nature reserve actually relates to the wider part of the nature reserve, and not this peripheral area (which actually offers no ecological value). As such, this strip of land can be designed to deliver a biodiversity net gain, with new tree and hedge planting and other appropriate measures, leading to an enhancement of the nature reserve, based on the current use of the land.
- 3.15 National planning policy supports the development of small sites like this. Paragraph 70 of the NPPF states that *'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly'*. The allocation of these small sites will help the LPA to meet this policy requirement. The allocation will support small local builders and can be developed without harm to the local area.
- 3.16 Paragraph 82 of the NPPF states *'In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs'*.
- 3.17 The central Broome site reference SN4020 is well related to the built-up area of the village and so its development will not have a harmful impact on the character of the countryside. The site is also much better related to the facilities in the area compared to the proposed allocation, and therefore we consider that the LPA's decision to allocate site VCBROM1 is not justified, leaving the plan 'unsound'. We consider that

this site should be the preferred allocation in Broome, since it is more sustainable than the proposed allocation site (located 0.6km further out of the village).

Allocation of Site VCBROM1 to Improve the Plan's Flexibility and Ensure Conformity with the NPPF and Emerging Government Planning Policy

- 3.18 Paragraph 86 of the NPPF requires that planning policies should be *'flexible enough to accommodate needs not anticipated in the plan... and to enable a rapid response to changes in economic circumstances'*. In view of the recent change in government, and the new government's well publicised aim to bring in changes to the planning system that will require a dramatic increase in house building, we consider that it would be prudent of the LPA to include an additional housing site within the plan, so to anticipate this uplift in house building and ensure the plan's flexibility in the face of a changing political landscape.
- 3.19 As such, should the LPA progress with site VCBROM1, then in order to ensure that the plan is in conformity with the NPPF, we consider that the LPA should improve the flexibility of the plan by allocating additional sites. By allocating site SN0346 (either instead of/or in addition to the existing proposed allocation) there will be flexibility to meet an increased demand for housing land in Broome in sustainable locations.
- 3.20 Allocating site SN0346 will improve the 'soundness' of the overall plan by accommodating some of the likely increased housing requirements that will result from anticipated changes to planning policy that are expected to be set by the new Government.

4.0 Conclusion

- 4.1 The site reference VCBROM1 is poorly located for housing development, compared to the alternative we propose at site SN0346.
- 4.2 We consider that the allocation of site VCBROM1 is ‘unsound’ because it is not justified in the face of more sustainable alternatives, is accompanied by an ineffective policy and is not in conformity with national planning policy. The proposal would extend ‘ribbon development’ into the countryside harming the character of the open countryside. The development will be remote from the main built-up area of the village and so will harm the character of the countryside. We consider that the draft policy, requiring the development to be ‘integrated within the countryside’ would be **ineffective** at preventing a harmful impact on the countryside, because the location, narrow shape, and small size of the development limits the opportunity for landscaping and good design. This is evident from the poor integration of the adjoining site, and we are not persuaded that allocating an almost identical strip of land will result in any better landscaping. Indeed, we have demonstrated that there are public footpaths which provide direct views of the site, such that the impact **cannot** be mitigated and the development will fail in the policy’s stated aim at ‘integration’.
- 4.3 Likewise, the draft policy is also **unsound** because the proposed traffic calming measures would be both **ineffective** and unnecessary.
- 4.4 Most importantly, we consider that the proposed allocation would be **unsound** because the location of development in such a remote and unsustainable location (in relation to the village facilities) would be **unsustainable** and **inconsistent with National Planning Policy**.
- 4.5 We have set out that there is an alternative strategy for allocation, which has not been progressed, and this makes the allocation of the proposed site **unjustified** and therefore **unsound**. We have set out the reasons why we consider site SN0346 to be a more sustainable and more justifiable allocation, and we consider that the LPA should have progressed this site. The location of site VCBROM1 is at the furthest point of Broome from the convenience store, primary school, and bus services to the west in Ditchingham, and the comprehensive facilities in Bungay. The allocation is contrary to national policy which seeks to protect the intrinsic beauty and character of the countryside, and to maximise opportunities for sustainable travel. The site should have been rejected for development in preference to a better located site which will not

harm the character of the countywide and which is better placed to encourage walking, cycling, and the use of public transport.

- 4.6 Nevertheless, should the LPA consider that they wish to progress with site VCBROM1, then in order to ensure that the plan is in conformity with the NPPF, we consider that the LPA should improve the flexibility of the plan by allocating additional sites. Allocating land for new housing over and above the minimum requirements will provide a sound plan, which is robust and flexible enough to remain relevant even with likely changes to housing targets soon to be handed down by central governments. We consider that the LPA should look carefully at options to increase the proposed housing supply and to allocate additional sites that will ensure that the Local Plan is flexible, relevant and sound into the future. Given the likely increased housing requirements that will result from anticipated changes to planning policy that are expected to be set by the new government, this would offer a sound approach.
- 4.7 These representations set out that the site reference SN0346 should be allocated for housing in the Local Plan either instead of site VCBROM1, or in addition to it, to ensure that the plan is found to be sound. This was put forward to the LPA first in 2021. The site is well related to the built-up area of Broome so development will not have a harmful impact on the character of the area. The site is well related to the nearby facilities in Ditchingham and Bungay. Housing was recently developed on a similar site nearby very successfully, and we have evidenced how well this site has been integrated into the landscape and the streetscene. We have demonstrated that there are no constraints to development of site SN0346 which cannot be addressed.
- 4.8 The site has existing homes, a road, and a footway immediately to the south. A good quality vehicular access can be created. New homes would reflect the pattern of development in the locality. The existing trees on the site would be retained in order to create a well landscaped development.
- 4.9 In conclusion, the allocation of the site reference SN0346 will mean that the Plan accords with National Policy and is positively prepared, and will be found to be a 'sound plan' in respect of the Broome development policy.