

South Norfolk Local Plan

**South Norfolk Village Clusters, Housing
Allocations Plan.**

Regulation 19 Consultation

**Objection to site VC DIT1 REV and Proposed
Housing Allocation Land Adjoining Wildflower
Way, Ditchingham**

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**Objection to site VC DIT1 REV and Proposed Housing Allocation
Land Adjoining Wildflower Way, Ditchingham**

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 South Norfolk Village Cluster Housing Allocations Plan Pre-Submission Addendum consultation which is underway until 7th October 2024.
- 1.2 Following the close of the previous Regulation 19 pre-submission version of the Village Clusters Plan the Local Planning Authority has identified that a site of 25 dwellings in Rockland St Mary (VC ROC2) is no longer considered achievable and a reduction in 5 dwellings at site VC TAS1 (Tasburgh) has been required. As such the total allocations in the Village Clusters Plan is below the minimum 1,200 dwellings required by the Greater Norfolk Local Plan.
- 1.3 These representations object to the extended allocation site VC DIT1 REV and propose that to meet the reduction in deliverable sites, the land adjoining Wildflower Way in Ditchingham is instead allocated for development. This site could provide a sustainable, well-designed, low-density development of up to 25 houses, including larger areas for biodiversity habitat and a strong native landscape buffer.
- 1.4 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, to be (a) sound, (b) legally compliant, and (c) prepared in compliance with the duty to co-operate.
- 1.5 These representations set out that the allocation of the extended site VC DIT1 REV is unsound. 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.

1.6 The allocation of land adjoining Wildflower Way is more sustainable than the increased allocation proposed for site VC DIT1 (VC DIT1 REV) since it is closer to facilities such as the village shop and bus stops than this proposed allocation extension. Therefore, these representations consider this extension site VC DIT1 to be unsound as they are not Justified in that they have not taken into account the adjoining Wildflower Way as a reasonable alternative. Allocating the land adjoining Wildflower Way in Ditchingham in the Ditchingham and Broome Cluster would be a sustainable allocation. The site is adjacent to the built-up area of Ditchingham and would be well related to the existing housing within the village.

1.7 We consider that allocating the land adjoining Wildflower Way as an alternative to the increased size of allocation VC DIT1 (VC DIT1 REV) would be more justified and more consistent with national policy, and therefore it would be a 'sounder' decision.

1.8 However, should the LPA wish to continue with the allocation of VC DIT1 REV, allocating the land adjoining Wildflower Way in addition to the proposed allocation would offer a solution that could also be 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 Plan's current '*minimum 1,200*' village cluster housing requirement for the area. Allocating an additional site would make the plan more flexible and '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 needs in the future. The drop in deliverable sites below the minimum housing figure, caused by the loss of just one site, and a small reduction in house numbers on another, shows that there is not sufficient buffer within the currently allocated sites and that the number of allocations should be increased.

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. A range of sizes and types of sites must be provided to deliver a range of housing and to support local housebuilders, and this would be important whether housing targets are increased. As such, allocating more land than is required by the minimum housing targets would be a sound approach.

- 1.10 The land adjoining Wildflower Way is closer to the village facilities than the expanded area of the VC DIT1 allocation site (VC DIT1 REV). It would make a more sustainable local plan allocation than the expansion of DIT1 (VC DIT1 REV). The site is very well related to existing homes and is used for arable farming. It is proposed that half the field is allocated for housing, which aligns with the screening provided by the woodland to the northeast. Additional planting could be created on the southwest and northwest boundaries to screen the site from views from the west and south.
- 1.11 The site is closely positioned very close to village amenities such as the village shop, and the nearest bus stop, and it is within easy walking distance to the Ditchingham Church of England Primary Academy, the Broome & Ditchingham Pre-school, and the Ditchingham Village Hall.
- 1.12 Therefore, this site should be considered as a suitable alternative or in addition to the expanded allocation of site VC DIT1 (VC DIT1 REV) to meet the shortfall in housing land which has been identified in the Village Clusters Housing Allocations Plan.

2.0 Assessment of Site Reference VC DIT1 REV

- 2.1 Site VC DIT1 REV proposes an increase in the area of 0.97ha to site VC DIT 1 and an increase of 10 houses to the allocation. These representations object to this increased allocation size as it is not the most sustainable location for housing and, therefore should be found to be 'unsound'.
- 2.2 The original proposed allocation site VCDIT 1 and the revised area of VCDIT1REV can be seen in Figure 2.1.

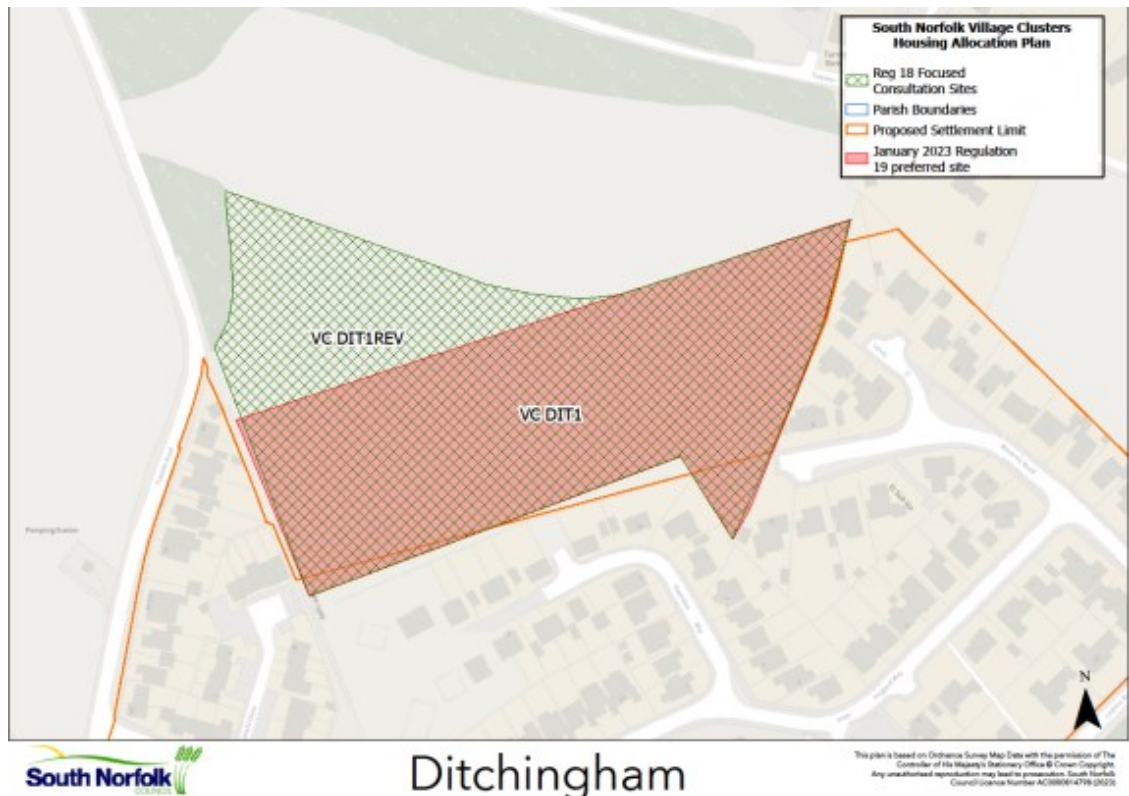


Figure 2.1 – VC DIT1 and VC DIT1 REV

- 2.3 As these images show, the revised location of VC DIT1 REV pushed north further into the countryside, elongating the village, and creating houses in a location disconnected and isolated from the centre of the village and services such as the village shop and bus stops.
- 2.4 There is also a prominent view across the field from Thwaite Road, which will be completely obscured by the proposed expansion of the allocation site. The original allocation VC DIT1 was clearly aligned so as not to interrupt this view from Thwaite Road, however, the expanded allocation area clearly obscures this.



Figure 2.2 - View Across VC DIT1 REV from Thwaite Road

- 2.5 As set out in the Regulation 18 assessment of the proposed allocation of SN0373, which the extended allocation of VC DIT1 REV includes, access through the existing housing development onto Rider Haggard Way through Hamilton Way. This is not an appropriate access for an allocation of 45 dwellings as this will have a negative impact on the amenity of the existing residents who live on this road.

3.0 Development Potential of Site

3.1 The land adjacent to Wildflower Way is a sustainable development option and would ensure that the plan would conform with the NFFP as it would be effective and 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 The land adjacent to Wildflower Way is well related to facilities and transport links, and it is adjacent to the built-up area of the village. The site is only 200 metres from the nearest bus stop which provides regular services to Bungay, Halesworth and Norwich. It is also approximately 390 metres from the Ditchingham shop, 420 metres from the Broom & Ditchingham Pre-School and, 485 metres from the Ditchingham Church of England Primary Academy. All these facilities are easily walkable from the site entirely along paved footways. This is shown in Figure 2.1.



Figure 3.1 - Proximity of the Site to the Village Facilities

3.3 The total area of the land adjacent to Wildflower Way is 3.55 hectares in size, however, these representations only propose that 1.5 hectares of this land are considered as part of an allocation as this relates well to the built environment of the village and the

woodland to the north provides screening and a strong backdrop from views to the south. This site offers good opportunities for landscaping, biodiversity net gain and (if required) a larger number of houses in future, as the housing need responds to changing Government Policy.

- 3.4 To the south of the site is an existing access which leads directly onto Wildflower Way which is a residential road. There is a footway along the south side of Wildflower Way which runs the length of the site and extends east across the village. To the east of the site are further houses and Ditchingham Park and Playground.
- 3.5 The site is flat and free from constraints.
- 3.6 The CrashMap record shows that there have been no accidents at the access to the site, or at the junction between Wildflower Way and Thwaite Road in the past 24 years.

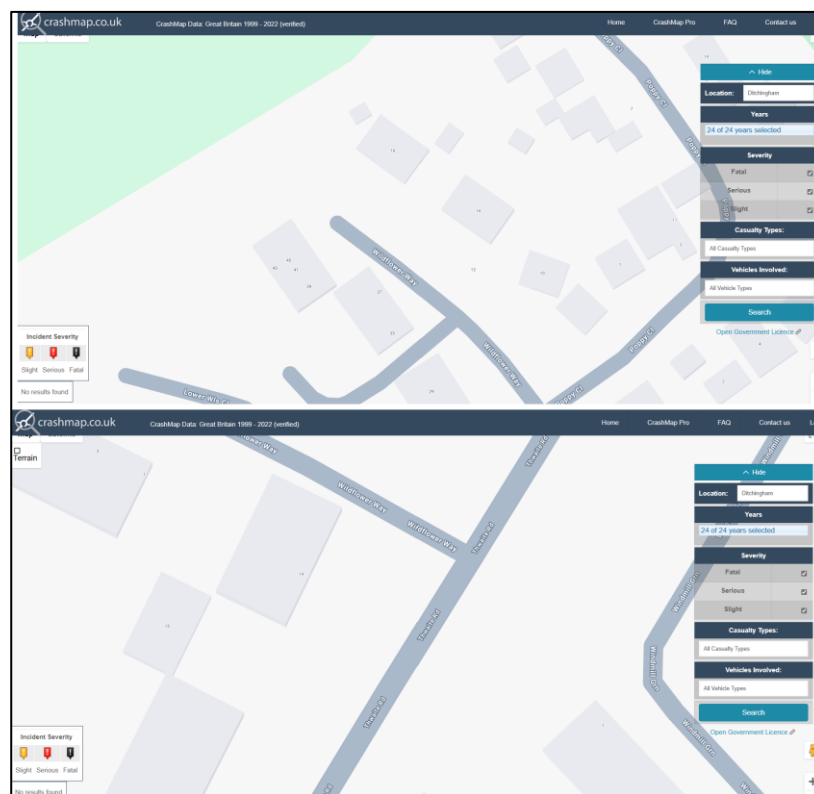


Figure 3.3: CrashMap (last 24 years) At Access onto Wildflower Way and Junction onto Thwaite Road

- 3.7 There are no Listed Buildings on or close to the site. The Ditchingham Conservation Area is located to the south of the site beyond the houses on Wildflower Way and Poppy Close. Development on the site would be sensitively designed to ensure that there would be no harm caused to views into or out of the Conservation Area. There are no trees subject to Tree Preservation Orders on the site.

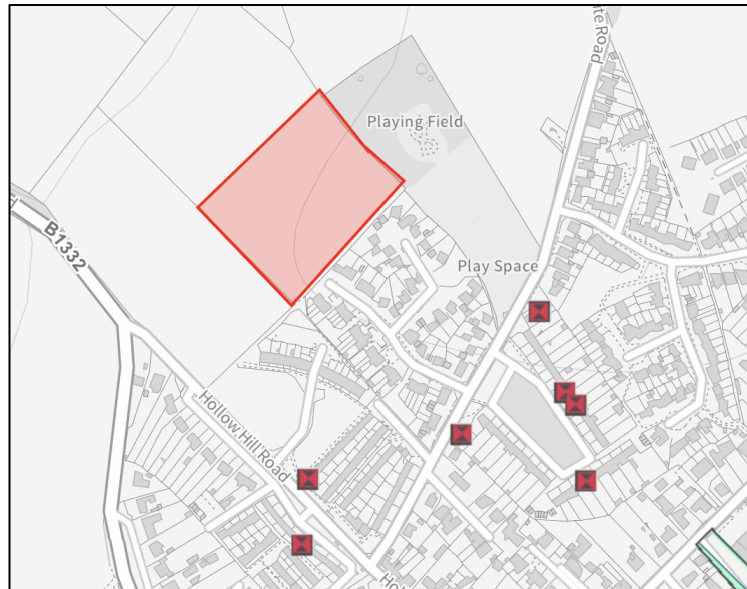


Figure 3.4: Environmental Constraints, Listed Buildings and Scheduled Monuments

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



Figure 3.5: Flood Zone Map

3.9 The site is adjacent to the village's settlement boundary and modern houses on either side of Wildflower Way and Poppy Close. There are also homes to the south of the site along Hollow Hill Road to the south. Development on the site would complement the modern character of Wildflower Way and Poppy Close and would be well-enclosed and

provide good access to the playing fields directly northeast.

- 3.10 The site is well related to the built-up area of the village so its development will not harm the character of the countryside. The site is also well related to the facilities in the village, and therefore we consider that the LPA's proposal not to consider this site for allocation, rather than extending allocation site DIT1 (VC DIT1 REV) is not justified, leaving the plan 'unsound'. This site should be considered as an alternative or in addition to the proposed extension to the DIT 1 (VC DIT1 REV) allocation in Ditchingham since it is a logical extension to the village boundary and is a sustainable location for new development.

Allocation of the Land Adjoining Wildflower Way to Improve the Plan's Flexibility and Ensure Conformity with the NPPF and Emerging Government Planning Policy

- 3.11 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*'. Given 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.
- 3.12 As such, should the LPA progress with the original allocation for site DIT1, to ensure that the plan conforms with the NPPF, the LPA should improve the flexibility of the plan by allocating additional sites. By allocating the site and land Adjoining Wildflower Way (either instead of/or in addition to the existing proposed allocation) there will be flexibility to meet an increased demand for housing land in Ditchingham in sustainable locations.
- 3.13 Allocating Land Adjoining Wildflower Way will improve the 'soundness' of the 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 Response to Regulation 19 Pre-Submission Omission

- 4.1 We consider the omission of The Land Adjoining Wildflower Way from the previous Regulation 19 Pre-Submission to be unsound.
- 4.2 During Reg 18 consultation under reference SN0343, the only issues raised regarding the site are that the site would; *“Represent an extension into open countryside with limited screening to reduce impact”*, and that it would be considered to have; *“a detrimental impact upon the form and character of the settlement and landscape overall”*.
- 4.3 However, the site is well-screened from views to the north and northwest by the existing woodland on the boundary. While the site can be seen from the southeast, the main view from Norwich Road in this direction has the existing housing behind as the backdrop, so the view from this direction would not substantially change.



Figure 4.1 - View of the Site From Norwich Road

- 4.4 The allocation of this site could include extensive planting on the south and eastern boundaries to provide a softened edge to the village and improve the view from Norwich Road.
- 4.5 There are existing houses between Norwich Road and Hollow Hill Road, which screen any view of the site from Norwich Road to the south of the junction with Hollow Hill Road. The houses on Hollow Hill Road, currently protrude, so the proposed housing allocation could align with the build line of these houses and the woodland backdrop while providing a thick and well-managed landscape buffer. This would avoid the development protruding into the countryside.



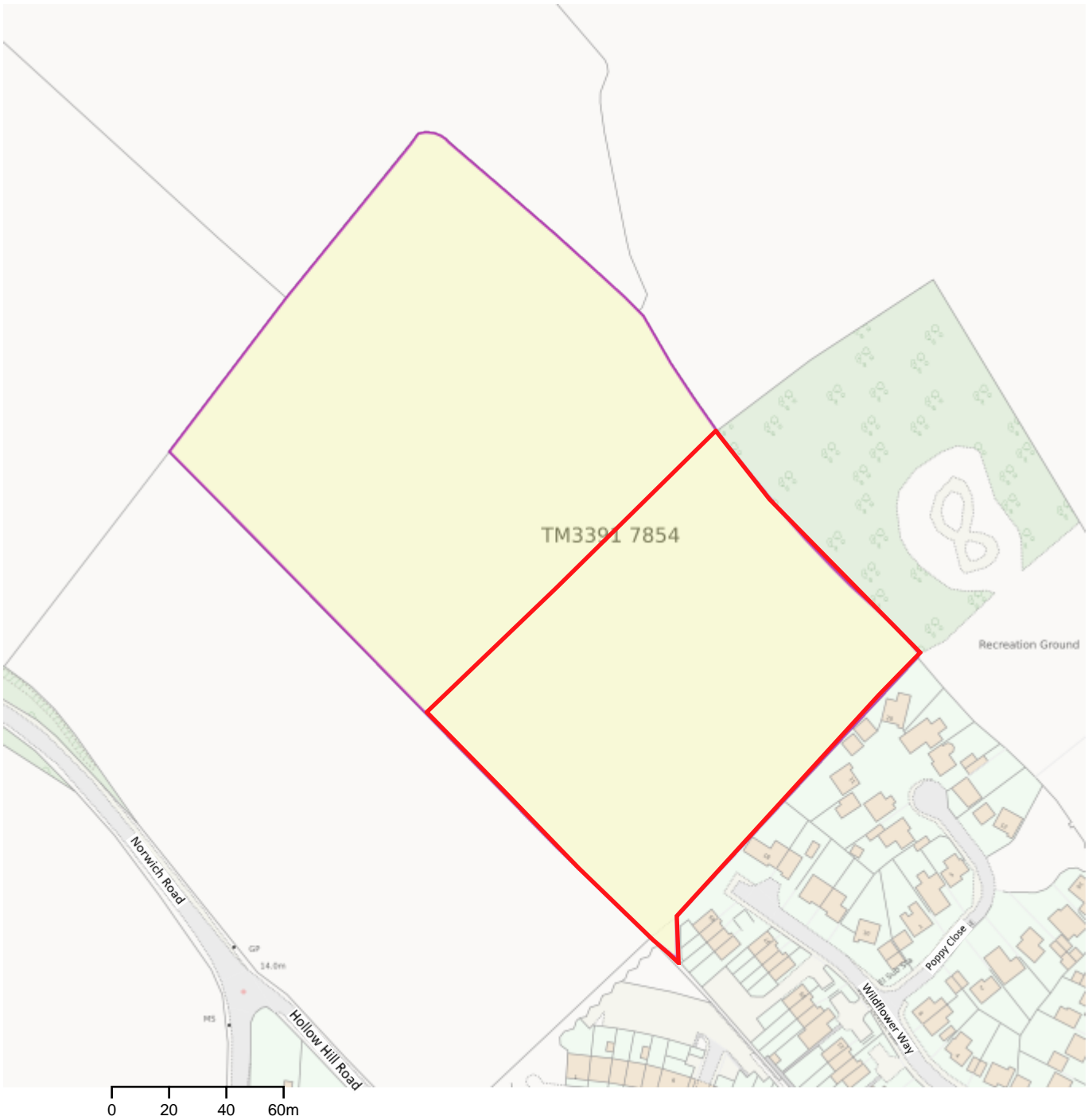
Figure 4.2 - Site Screening and Build Line Corresponding to Existing Housing

5.0 Conclusion

- 5.1 These representations set out that the site; Land Adjoining Wildflower Way should be allocated for housing in the Village Clusters Housing Allocations Plan either instead of the extended allocation DIT 1 (VC DIT1 REV) or in addition to it, to ensure that the plan is found to be sound.
- 5.2 The site is within a short walking distance of all the facilities in Ditchingham. There are no constraints to the development of the site which cannot be addressed. The site is well related to the built-up area of Ditchingham which forms its backdrop for views from the southwest.
- 5.3 The site has existing homes, a road, and a footway immediately to the southeast. A good quality vehicular access already exists. New homes would reflect the pattern of development in the locality. The site has thick trees to the northeast, which provides good screening from this direction. The proposed landscaping buffer will improve the views towards Ditchingham from Norwich Road to the southeast and will have a positive impact on the landscape character and biodiversity habitat.
- 5.4 In conclusion, the allocation of the Land Adjoining Wildflower will ensure that the Village Clusters Housing Allocations Plan accords with National Policy is positively prepared, and will be found to be a 'sound plan' in respect of the Village Clusters Policy.

Location Plan

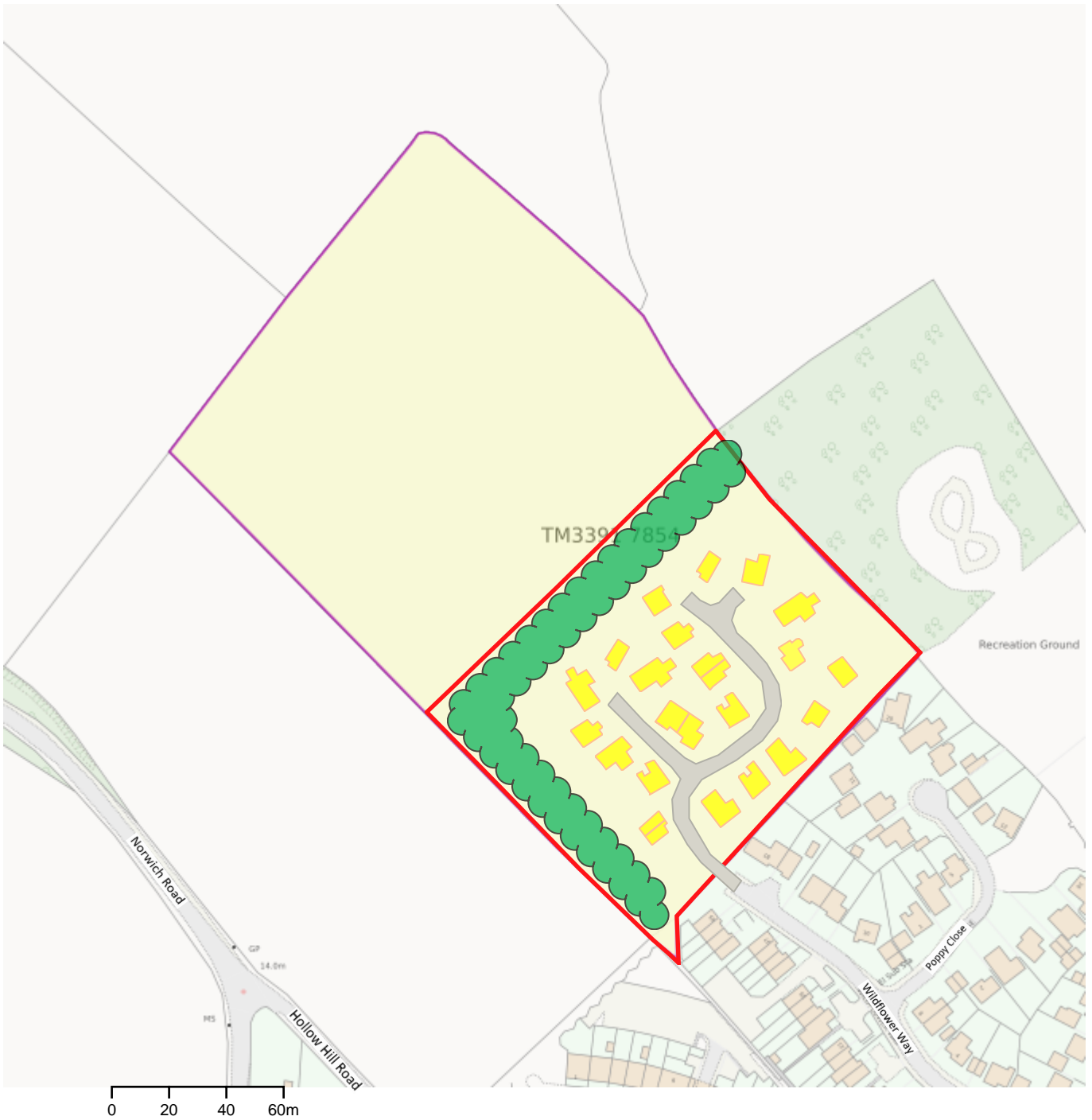
Land Adjacent to Wildflower Way



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Indicative Site Plan

Land Adjacent to Wildflower Way



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