

**Planning Policy Team  
South Norfolk Council**

The Horizon Centre,  
Broadland Business Park,  
Peachman Way,  
Norwich,  
NR7 0WF

02 October 2024

**Lanpro Project Number: 3096**

By email: [localplan.snc@southnorfolkandbroadland.gov.uk](mailto:localplan.snc@southnorfolkandbroadland.gov.uk)

Dear Planning Policy Team,

## **South Norfolk Village Clusters Housing Allocations Plan - Regulation 19 Pre-submission Addendum**

I am writing on behalf of my client Bennett Homes, who have instructed Lanpro to submit representations in relation to Policy VC SWA1 (Land off Bobbins Way, Swardeston) and Policy VC SWA2 REV (Land on Main Road, Swardeston) as part of the South Norfolk Villages Clusters Housing Allocations Plan (VCHAP) – Regulation 19 Pre-submission Addendum consultation.

The Council previously published a Regulation 19 pre-submission version of the Village Clusters Plan between 23 January and 8 March 2023. The Regulation 19 version of the Plan was the one which the Council intended to submit to the Secretary of State for Examination in Public and, ultimately, adopt as part of the Local Plan. However, following the close of the Regulation 19 publication period it became apparent that the total allocations in the Village Clusters Plan fell below the minimum 1,200 dwellings required by the Greater Norwich Local Plan (the GNLP).

Between 11 December 2023 and 5 February 2024, the Council undertook a new Regulation 18 consultation on Alternative Sites and Focused Changes to address both the shortfall, plus a small number of other issues which had emerged during the Regulation 19 publication. The Council is now publishing a final series of proposed changes to the 2023 Regulation 19 plan, as an Addendum to that document.

Under this latest Regulation 19 consultation, the Council is proposing:

- three new sites (VC BAR2, Barford, for approximately 40 dwellings and community facilities; VC BRM1, Broome for at least 12 dwellings; and VC EAR2, Earsham for up to 25 dwellings)

- four extended sites (VC DIT1 REV, Ditchingham, extended by 10 dwellings; VC GIL1 REV, Gillingham, extended by 5 dwellings; VC SPO1 REV, Spooner Row, extended by 20 dwellings; and VC WIC1 REV, Wicklewood, extended by 10 dwellings)
- one site with increased density (VC SWA2 REV, Swardeston, increased by 10 dwellings)

### **Policy VC SWA1 (Land off Bobbins Way, Swardeston)**

The Site is identified as 'VC SWA1' within the South Norfolk VCHAP (Regulation 19) and is located immediately adjacent to the settlement boundary on the eastern side of Swardeston. The Site comprises of 1ha of brownfield land formerly occupied by a plant nursery, with redundant greenhouses and a former farm shop remaining on the Site.

Only minor amendments are proposed to paragraph 6.16, the pre-amble to Policy VC SWA1. These minor amendments are not considered to have a material bearing on the interpretation of Policy VC SWA1.

Bennett Homes continues to support the allocation of VC SWA1 for residential development. Lanpro, on behalf of Bennett Homes, has previously submitted representations in relation to Policy VC SWA1 during the earlier Alternative Sites & Focused Changes (Regulation 18) consultation. As part of these representations, Bennett Homes promoted the allocation of an additional 0.6ha of land to enable the delivery of an additional 10 residential dwellings at the Site. Please see the attached letter at Appendix 1 for full details of this representation. For the reasons set out in this previous representation, Bennett Homes maintains that Policy VC SWA1 should be extended to include the additional 0.6ha and uplift the number of dwellings allocated through this policy from 20 to 30.

This suggested increase in site area and number of dwellings is supported by the consultation on amendments to the NPPF which commenced on 2 August 2024 and closed on 24th September 2024. This consultation seeks to amend the standard method for calculating housing supply, the effect of which would be to increase the annual housing requirement over the Greater Norwich Local Plan area from 1,929 to 2,647 dwellings per annum. Allocating additional housing to support this increased housing requirement would be consistent with the objective of the NPPF (both in its adopted and current consultation) in seeking to significantly boost the supply of homes and delivering a sufficient amount and variety of land where it is needed. Such an amendment would assist in achieving a plan which has been positively prepared, justified, effective and consistent with national policy and therefore 'sound'.

### **Policy VC SWA2REV (Land on Main Road, Swardeston)**

The Site is identified as 'VC SWA2REV' within the South Norfolk VCHAP (Regulation 19) and is located to the south-east of the junction between Main Road and Gowthorpe Lane, Swardeston. The Site comprises of agricultural land and is subject to planning application 2023/0908 (made by Bennett

Homes) for full planning permission for a development of 43 new dwellings and associated external works.

The proposed amendments include significant changes to paragraph 6.21-6.27 which provide the context to Policy VC SWA2REV. The policy wording is then amended, amongst other changes, to alter the number of dwellings that the site is allocated for from 'approximately 30 dwellings' to 'approximately 40 dwellings'.

Bennett Homes fully supports the uplift in dwellings from approximately 30 to 40, and considers that the allocation of the Site supports the principle of application 2023/0908 which Bennett Homes are anticipating will be heard at Planning Committee in Autumn 2024 with an officer recommendation of approval.

Notwithstanding this support for Policy VC SWA2REV as amended through this current consultation, Bennett Homes maintain that the submitted application for 43 dwellings would have been acceptable under previous iterations of this policy and that the effect of the proposed amendment to Policy VC SWA2REV would not result in any increase in actual housing numbers in Swardeston (as these would have been delivered regardless of the proposed amendment). This provides further justification for increasing the number of dwellings from 20 to 30 on Policy VC SWA1 as outlined above on the basis that this would represent an actual increase in the number of homes that the VCHAAP would deliver.

Bennett Homes also note that the Policy VC SWA2REV requires "The provision of a 2.0m wide footway along the site frontage..." (my emphasis). The site has a frontage with both Main Road and Gowthorpe Lane, but the provision of a footpath on the latter would not be necessary to facilitate the development of the Site. Accordingly, Bennett Homes suggest that the first bullet point is amended to read:

*"The provision of a 2.0m wide footway along the site frontage with Main Road..."*

## **Conclusion**

Overall, Bennett Homes continues to support the allocation of VC SWA1 and VCSWA2REV for residential development. Bennett Homes are of the opinion that VC SWA1 could deliver an additional 10 residential dwellings at the Site through an increase in site area as set out in detail in Appendix 1, helping the Council to achieve the housing numbers required within the VCHAAP and supporting the need to significantly boost the supply of housing.

Yours Sincerely

Charles Judson

**Associate Director Planning**

Enclosed: Appendix 1 – Regulation 18 representations (VC SWA1 – Land off Bobbins Way, Swardeston)



## Appendix 1 - Regulation 18 Representations (VC SWA1 – Land off Bobbins Way, Swardeston)

**Planning Policy Team**  
**South Norfolk Council**  
The Horizon Centre,  
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Norwich,  
NR7 0WF

26<sup>th</sup> January 2024

**Lanpro Project Number: 5051**

Dear Planning Policy Team,

### **South Norfolk Villages Clusters Housing Allocations Plan – Consultation on Alternative Sites & Focused Changes (Regulation 18) – Land at Bobbins Way, Swardeston (Policy VC SWA1)**

I am writing on behalf of my client Bennett Homes, who have instructed Lanpro to submit representations in relation to Land at Bobbins Way, Swardeston ('the Site') (see Appendix 1 – Land shaded in green) as part of the South Norfolk Villages Clusters Housing Allocations Plan (VCHAP) – Consultation on Alternative Sites & Focused Changes (Regulation 18).

The Consultation focuses on small number of parishes, which includes Swardeston. The consultation is a result of one site no longer being deliverable and another site's housing numbers being reduced to address heritage concerns. The consultation therefore seeks focused changes to make up the resulting shortfall in order to deliver the housing numbers required.

#### **The Site**

The Site is identified as 'VC SWA1' within the South Norfolk VCHAP (Regulation 18) and is located immediately adjacent to the settlement boundary on the eastern side of Swardeston. The Site comprises of brownfield land formerly occupied by a plant nursery, with redundant greenhouses and a former farm shop remaining on the Site.

The Site is situated between two Bennett Homes sites. 'Land off Bobbins Way' comprises of 38 dwellings and has been built out to the west and south. 'Land at the Junction of Gowthorpe Lane and Main Road' is located immediately to the north and is an allocated site and currently has a planning application under consideration for a development of 43 dwellings.

Swardeston is grouped along with Mulbarton, Bracon Ash and East Carleton to form a 'Village Cluster'. Within the village cluster a good range of services and community facilities are available. Public transportation is available approximately 350m from the Site boundary on Main Road with bus services operated by First Group (Service 37 and 37B) and Coach Services (37A). These provide a bi-hourly service between the hours of 7am and 7pm.

## Representations and the Current Allocation

Lanpro have previously made representations on behalf of Bennett Homes in relation to the Site, which highlighted the lack of constraints and the potential for the Site to provide for additional dwellings. South Norfolk's VCHAP allocates 1.0ha of the Site for approximately 20 dwellings, however, land amounting to 1.6ha at the Site has previously been promoted.

The Regulation 19 Pre-submission Draft allocation wording of the VCHAP requires *'the introduction of an appropriate boundary to the east of the site to contain it within the landscape and integrate it into the rural context'*. Within the draft supporting policy wording it states that *'a contiguous boundary to the east of these sites (The Bennett Homes sites) will contain the development within the wider landscape, minimising the visual impact of the built form...'*

## Proposal

Bennett Homes continues to support the allocation of VC SWA1 for residential development. As previously set out and confirmed through the draft allocation and recent development within Swardeston, the village is considered to be a sustainable location for new housing development. Furthermore, the allocation benefits from having a reputable housebuilder onboard who has a track record of delivering high-quality residential development within Swardeston, as well as within the wider district of South Norfolk.

Whilst our client recognises the need to identify a specific area for the allocation, it is considered that the approach taken by the Council to limit the eastern boundary of the allocation to a straight line matched to that of the adjacent sites, is arbitrary. It is noted that this approach results in a 50m x 100m strip of unused land between the allocation and the field boundary being leftover, which is not considered to make efficient use of the land available.

It is considered that a more contextual approach and a more appropriate edge to the Site would be the field boundary to the east, increasing its Site from approximately 1ha to 1.6ha. Bennett Homes propose focusing residential development on the western portion of the Site (on approximately 1.2ha of the Site), providing 30 dwellings which would result in a gross density of 18.75 dwellings per hectare. The remaining land, all of which steps outside of the current proposed allocation, would be primarily used for biodiversity net gain, public open space and sustainable drainage. It is considered that this would help to provide an appropriate landscaped transition from urban to countryside on the eastern boundary, whilst also enabling an uplift in the number of houses delivered on the Site.

Bennett Homes would welcome a discussion on how this approach can be secured within any allocation wording.

Consideration of the landscape impact of increasing the size of the allocation site has been had below. Overall, there are limited locations in which a larger allocation site would be potentially visible from. It is considered that there would be no harm to any receptors to the west of the Site, as the majority of this land is already residential, and the additional land would not compromise any important or protected views.

To the east, it is considered that there are limited public vantage points from which the larger allocation would be viewable from, with any views principally from Gowthorpe Lane. However, the extensive roadside vegetation limits these views to just a single field access and a small number of residential/holiday let properties, all of which are located at least 230m away, and would view the additional land within the context of existing/allocated adjacent development.

The nearest Public Right of Way (Swardeston Footpath 6) is located 130m from the allocation boundary of the Site. Allowing a larger allocation would reduce this distance to approximately 95m. However, it is considered that a more appropriate urban to countryside transition can be established and therefore the limited amount of new build development in the landscape would be appropriately screened and reduce any potential impact on receptors using the Public Right of Way.

Further to the above, Bennett Homes wishes to make the Council aware of an additional area of land which Bennett Homes can make available for residential development (see Appendix 1 – Land shaded in red), should the Council require additional housing numbers. This Site again could be appropriately landscaped to transition from urban to countryside and could provide direct access to Swardeston Footpath 6.

### Conclusion

Overall, Bennett Homes continues to support the allocation for VC SWA1 and it is considered that the Site is a sustainable location for residential development. Bennett Homes have a track record of building high-quality development within Swardeston and could deliver an additional 10 residential dwellings at the Site, helping the Council to achieve the housing numbers required within the VCHAP.

It is considered that the allocation of an additional 0.6ha at the Site would not result in any landscape harm and that the benefits of providing an urban to countryside transition could provide some enhancements, as well as the benefits of 10 additional houses. Additional land is available immediately adjacent to the allocation site, should the Council need to bolster their housing delivery.

Should you require any further information in respect of the Site, please do not hesitate to contact me.

Yours Sincerely,

*Dean Starkey*

Dean Starkey MRTPI

**Senior Planner**



## Appendix 1 Land Mapping



