

**Please find below response from Mulbarton Parish Council in regards to South Norfolk Village Clusters Housing Allocations Plan (Reg. 18 Draft)**

**QUESTION 1:** Do you agree with the Objectives for the Village Clusters Plan? If you think the Objectives should be changed, please explain how and why.

SNVC Objective 1 – Meet housing needs

“Deliver housing in accordance with the Greater Norwich Local Plan housing target”

**Comment:** No. Those communities that wish to build more houses should be provided with help and support to allow them to do so. This can already be achieved through the Neighbourhood Plan process and other schemes. Conversely, communities which are not seeking any more house-building in their area should not be required to allocate their own resources to oppose allocations derived from the Greater Norwich Local Plan target.

The first sentence of this Objective should read to ‘allocate viable and deliverable sites in response to requests from, and in consultation with, local communities and consistent with existing Neighbourhood Plans.’

SNVC Objective 2 – Protect village communities and support rural services and facilities.

**Comment:** No. This objective, as worded, is meaningless and unnecessary. Where local schools are at risk of closure, or bus services are not economically viable, dialogue should be initiated with the affected community to resolve the difficulties by considering a range of alternatives. This may or may not lead to more houses. Conversely, where local services have reached the point of collapse due to past developments, more houses will make the situation worse for at least the next ten years. These communities can be protected and supported by concentrating house building in urban areas with economies of scale.

The objective, as worded, makes no reference how new housing development will support local services and facilities, rather than overwhelm them. No reference is made for the need to protect local services and facilities. The objective should be removed entirely.

SNVC Objective 3 – Protect the character of villages and their settings

**Comment:** No. Experience of local planning shows that ‘ensure appropriate landscaping measures’ cannot be relied upon to produce acceptable outcomes. The word “appropriate” is not defined. What does “appropriate” mean, what will it look like, how will anyone know if it’s “appropriate” and what criteria will be used against which it is measured? The wording should be changed to give the local community a formal role in approving any landscaping measures, with the clear possibility of the site not being allocated if the proposals rejected.

**QUESTION 2:** Do you agree that the Village Clusters Plan should include a policy on 'Standard requirements'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?

Policy SNVC1 – Standard requirements

**Comment:** There should be a policy on Standard Requirements, but the proposed criteria should be extended to include:

- A requirement to obtain and publish a statement from the local education authority detailing available capacity in the primary and secondary school catchment area.
- A requirement to obtain and publish a statement from the local health authority detailing available capacity for health and dental care in terms of patients per GP, etc. with a comparison against national standards, guidelines and benchmarks.
- A requirement for the developer to produce and publish an environmental impact statement, however brief, describing the effect of additional journeys to work, etc.

The use of vague and undefined terms such as: “proportionate”, “minimising the impact” and “landscaping consistent with” should be changed to include a requirement to consult with the local community as to what is proportionate or acceptable.

The phrase “minimising the impact on the amenity of local residents” should be changed to “enhancing the amenity of local residents, subject to the approval of the local community”.

In this context, we support the broad comments made by CPRE Norfolk and the South Norfolk Green Party, to the effect that further house-building in rural villages should be on an exceptional basis, and subject to a maximum limit, and not a minimum of 1,200 units.

**QUESTION 3:** Do you agree that the Village Clusters Plan should include a policy on 'Design'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?

Policy SNVC2 – Design

**Comment:** Yes, there should be a policy on Design, but it is highly likely that the specific design requirements of each site will be quite different. The policy should make this clear.

“Encourage good quality design” – who decides this and what is the definition of good quality design? Experience shows that general encouragement cannot be relied upon.

The draft GNLP states the need for a “radical shift away from the use of private car, with many people walking, cycling or using clean public transport”. As this is unlikely to happen before new homes are built then plans need to assume at least two cars per dwelling and the need to specify that all parking is off road.

The phrase “massing for the locality” is obscure, and should be replaced by plain English.

**QUESTION 4:** Do you agree that the Village Clusters Plan should include a policy on 'Housing Mix'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?

Policy SNVC – Housing Mix

**Comment:** There is no reference in the Village Clusters plan to social housing. Affordable housing is not social housing. Even where a Neighbourhood Plan has not been produced, local communities will be aware of their existing housing mix and should be consulted on what is actually needed.

The relationship between the proposed housing mix and the need for educational and healthcare provision has not been explored in the supporting evidence.

## **25. Mulbarton, Bracon Ash, Swardeston and East Carlton**

### **Form and Character – Mulbarton**

**Comment:** The description of the form and character of Mulbarton is inadequate, wrong, and contains factual errors which should be corrected, including the map on page 347.

Historically, the village did not develop with individual properties fronting the Common. The local economy was based around three large farms, with the Common used for grazing until the 1950s. The church, coaching inn, and the old village hall are at the top end of the Common, where shops and the post office were also once located. The village primary school is now located to the south of the Common, and the development of the modern housing estates has also proceeded southwards.

This process, which was initiated by planning policy in the 1970s, is now complete.

The second Hopkins Homes development was approved on the basis that it would 'round out' the settlement boundary. To the south-east, the self-build properties in Bracon Ash now join the southern boundary of Mulbarton, directly opposite the second Hopkins Homes development, and to the west, a strategic gap is maintained between the Mulbarton and Bracon Ash settlement boundaries. This is recognised in the Neighbourhood Plan.

There are no less than 16 listed buildings of Grade II or above forming a network in and around the two square miles of the village of Mulbarton. This includes the Worlds End pub, situated on the New Buckenham to Norwich Turnpike, laid out in 1772, and now identified as the B1113. A mediaeval lane (Long Lane) runs due south from the top of the Common, by the village pond, towards the village of Flordon. Some properties to the south of the Common are very old. There are close historical links between Mulbarton, East Carleton and Bracon Ash, and traffic displaced from Mulbarton would affect listed buildings there.

It is entirely wrong to suggest that "As a result of past planning policies, The Common has remained as a large undeveloped space in the centre of the village."

It is also wrong to suggest that "There has been little development on the edges of The Common in order to preserve its impressive open appearance and allow views out over the surrounding countryside, drawing the countryside into the core of the village".

Mulbarton Common is privately owned, registered as common land, protected by a set of bye-laws, and managed under a Scheme of Management under the Commons Act of 1899. It is also a County Wildlife site. The economic history of Mulbarton is primarily rural and agricultural, and does not exhibit the 'historic core of the village' topography that is typically found in small market towns with a different function in the economic hierarchy of settlements. The conservation area includes the whole of the Common and much of the surrounding area. It should be clearly identified in this section of the Village Clusters plan, and it should also be shown on the map in Appendix 2, page 347.

### **Services and Community Facilities**

**Comment:** This section of the VCHAP also contains errors which should be corrected.  
“The cluster possesses a good range of facilities which includes infant and junior schools”.  
No – there is only one primary school serving the cluster.

“The area has good access to Norwich via the B1113 and A140”. No – the use of the word “good” is highly subjective. There are pinch points on the B1113 between Mulbarton and Norwich where two large vehicles cannot pass each other going in opposite directions.  
Access onto the A140 is not “good”. Apart from accessing it via the B1113 at the Harford junction, the only other routes to the A140 are via narrow and winding country lanes with some parts narrowing down to one lane. These are unsuitable for high volumes of traffic. The A140 junction at Harford Bridge is notorious for its very poor design layout, leading to severe congestion at peak times. This is particularly relevant to commuter housing. The proposed industrial development will make the situation worse for the next few years.

### **Settlement Limit and Constraints Mulbarton and Bracon Ash**

**QUESTION 87: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.**

**Comment:** Whilst the settlement limit may be appropriate, with no changes proposed for the village of Mulbarton, the full range of constraints has not been properly identified. The answers already given to **Question 2** also apply here.

“The existing primary school is noted as operating at capacity.”

“Further exploration will be needed to ensure primary school needs can be met.”

These vague statements are misleading, and no mention is made that health services within Mulbarton are already struggling to provide a service and are well above capacity.

Mulbarton has, over the years, had more than its fair share of housing development to the point where the local roads cannot cope with the increased traffic, the school is full, the catchment high school is also full, and the local GP surgery is unable to provide a service to an acceptable standard. In addition, the building of more houses in the other villages in the cluster has had, and will continue to have, a major detrimental impact on Mulbarton services and facilities and the general quality of life of both existing and new residents.

There needs to be a clear commitment to ensuring the school can cope before any development in Mulbarton and surrounding villages is considered. After many years of debate and argument, there does not seem to be any practical method to ensure this commitment, and the site itself has little or no space for expansion. Utilising remaining spaces at the nearest alternative school does not support reducing private car use, and public transport is not an option, nor is walking to the nearest alternative.

The following table shows the recent increase in houses, population, children and vehicles.

Year of census	Number of houses	Number of people	Number of children #	Number of cars and vans	Cars and vans per household
1851	129	557	-	-	-
1901	132	507	-	-	-

1951	184	598	-	-	-
1961	258	735	-	-	-
1971	375	1,132	-	-	-
1981	445	2,250	374	-	-
1991	1,116	2,950	503	1,389	1.25
2001	1,131	2,827	351	1,625	1.45
2011	1,473	3,521	467	2,278	1.55
2021 *	1,751	4,185	560	2,708	1.55

\* Estimates, based on planning applications approved in the parish of Mulbarton only.

# Children under ten years old expected to attend the local primary school.

Traffic surveys carried out more than three years ago showed that, during the two-hour morning peak from 7:00am to 9:00am, about 1,200 vehicles travel northward on the B1113 past the Worlds End pub, and more than 430 vehicles travel northward from Bluebell Road towards the junction of Long Lane with the B1113. These traffic flows have now increased considerably, due to the recent completion of the second Hopkins Homes development. In particular, there is peak hour congestion in the 20mph zone around the primary school.

The school was built in the 1970s to accommodate about 250 local children, and has now doubled in size. It is also already accommodating children from other communities where smaller schools have been closed over the years, or have not been expanded. There is no dedicated parking, or any kind of drop-off / collection facility, for parents at the school and no space available to provide one. This leads to peak hour parking issues on a daily basis.

The GP surgery is contained within the former school caretaker's bungalow and already serves surrounding villages as well as Mulbarton. It too has no dedicated parking space of its own for the use of patients. The nearest alternative GP surgery is at Newton Flotman.

Amenity land is a further constraint. As development has progressed, housing density was generally increased, leading to a shortfall of local amenity land. A different approach was adopted for the two Hopkins Homes developments, but despite the proximity of Mulbarton Common, there is an existing shortfall of amenity land within many of the earlier estates, such as the Lark Rise estate to the west, and the Bluebell Road estate to the east. These two estates have some of the highest housing densities in the village:

Lark Rise estate	30.88 units per hectare
Bluebell road estate	28.07 units per hectare
Average for all estates	24.50 units per hectare
Average for the village	22.00 units per hectare

### Preferred and shortlisted sites

#### Site: SN0204, Bobbins Way, Swardeston

**QUESTION 88:** Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response and please specify which site(s) you are referring to. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

**Comment:** Object. Where will the children from the new houses on this preferred site go to school? Where will the families access medical facilities? Development on this site will simply add to the cumulative impacts on the village of Mulbarton, already unacceptable. Our comments on this site include the answers given above for Questions 1 to 4, and 87.

**Site: SN2038, South of Rectory Lane, Mulbarton**

**QUESTION 89:** Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response and please specify which site(s) you are referring to. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?

**Comment:** Object. Where will the children from the new houses on this preferred site go to school? Where will the families access medical facilities? Development on this site will simply add to the cumulative impacts on the village of Mulbarton, already unacceptable. Our comments on this site include the answers given above for Questions 1 to 4, and 87.

For this particular site:

- Having drawn the settlement boundary, why is this proposed development outside of it?
- The site extends into the countryside, outside the built area, adding yet more cumulative impact onto the fast disappearing but highly valued rural area surrounding Mulbarton.
- It is contrary to the policies of the adopted Mulbarton Neighbourhood Plan.
- The preferred site is not well located in terms of access to services and facilities. Access would be via a narrow road through an existing estate. The site is therefore unsuitable.
- Extra traffic generated would need to exit the site through the existing estate onto Long Lane, and joining the 20mph restricted zone around the primary school. At peak times this area is already very congested with school children and parents, as well as school buses and the public bus service. Buses already struggle to pass each other within the village.
- There would be adverse impacts from more traffic (35 dwellings x 2 vehicles) turning onto an already congested Long Lane, opposite a bus stop, and near to the school entrance.
- The preferred site proposes 35 dwellings on 1.5 hectares site, whilst Swardeston's 1.6 hectares preferred site only has 25 dwellings proposed. This is an inconsistent approach to layout and green space provision. To be consistent with the Swardeston site, the density for this site SN 2038 should be no more than 15 units per hectare, or 20 units.
- There is already a deficit of amenity land on the Bluebell Road estate. The proposed housing density of 23 units per hectare would not reduce the overall density of the estate. A maximum of ten units would help to bring the density towards the average of 24.5.
- The design of the site should be laid out to prevent any further expansion eastward. If there is no way to secure this restriction through conditions, the site should be rejected.
- Mulbarton School is FULL. It is suggested that the extra Primary School students go to Newton Flotman School. That means a car journey down a narrow country lane making a carbon footprint and removing the beneficial aspects of walking to school, both physical and social. It also takes students away from the friendship groups in the village which provide emotional and educational support for both children and parents.
- Vehicles leaving the proposed new development would therefore have to navigate their way southwards to get to Newton Flotman. This direction of travel is almost impossible at peak times, due to the amount of school run traffic, parking, pedestrians and buses.
- The local secondary school at Hethersett is at present oversubscribed. Bearing in mind the plans for well over a thousand more houses in Hethersett, where will the secondary age pupils

be able to go to school with their peers and siblings from the village?

- Medical facilities with the village are already overwhelmed and additional development within the village and those surrounding it will further impact medical services. Mulbarton Surgery is part of the Humbleyard Practice with Cringleford and Hethersett, which already have no spare capacity, and both will have less going forward with the proposal for almost three thousand more dwellings that are to be built in those areas under GNLP.
- Current transport infrastructure cannot support more cars using the already congested B1113 with its badly designed bottleneck at the Harford Bridge A140 junction. At the same time, the Park and Ride capacity has been drastically reduced by Norfolk County Council.
- Offshore wind farm substations with the potential for up to four new electricity substations and three planned solar farms in the area will completely overwhelm the B1113 travel corridor if being built at the same time as any proposed developments within the village.

**QUESTION 90:** Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response and please specify which site(s) you are referring to.

**Comment:** MPC agrees with SNC's decision to reject the listed sites for the reasons given above in answer to Questions 1 to 4, Question 88, and the following reasons:

- Education. This will impact on the already full Mulbarton Primary School and on the local secondary school at Hethersett taking into consideration the plans for over a thousand houses in Hethersett and additional development in Cringleford.
- Medical facilities with the village are already overwhelmed and additional development within the village and those surrounding it will further impact medical services. Mulbarton Surgery is part of the Humbleyard Practice with Cringleford and Hethersett which have no spare capacity and will both have less going forward with the proposal for almost three thousand more dwellings that are to be built under GNLP.
- Current transport infrastructure cannot support more cars using the already congested B1113 with its bottleneck at the Harford Bridge junction. Park and Ride capacity has been drastically reduced by Norfolk County Council.

Additional site specific comments are provided below.

**SN0026SL** Jasmine Cottage, The Street, Bracon Ash

Agree with the reasons given for rejection, and:

- Cumulative impact on medical and educational provision in Mulbarton.
- Added traffic to the already congested B1113 to access Norwich.
- Lack of local amenities.

**SN0195** Land off the B1113 Norwich Road, Bracon Ash

Agree with the reasons given for rejection, and:

- This site is amenity land adjacent to the Lark Rise estate, and should not be considered as available, suitable, or deliverable. Mulbarton Parish Council will oppose development.
- Cumulative impact on medical and educational provision in Mulbarton.
- Added traffic to the already congested B1113 to access Norwich.
- Lack of access to local amenities.
- No access to south of plot.
- North access/egress not to Highways standards.

- No access to existing infrastructure.
- Flood risk.

**SN0315** Land to the east of Mulbarton

Agree with the reasons given for rejection, and:

- Totally inappropriate in the context of the Village Clusters Plan objectives.
- Cumulative impact on medical and educational provision in Mulbarton.
- Added traffic to the already congested B1113 to access Norwich.
- Lack of access to local amenities.

**SN0496REV** Land north of Mulbarton

Agree with the reasons given for rejection, and:

- Diocese objected to the previous planning application re the footpath though the church yard and the possible tarmac and lighting being added which are totally out of context for the village and would be detrimental to Mulbarton Common and the conservation area.
- Over 650 residents signed a petition opposing the previous development on this site.
- Doctors Surgery was not backed by the Humbleyard Practice for Oakley Park this will probably be no different as the issue is a shortage of doctors, not facilities, at present.
- Application SN2020/1499 for three dwellings was recently refused. NCC commented: "The proposed development site lies on the edge of Mulbarton Common, close to the medieval parish church of St Mary Magdalen. In the past churchyards were frequently larger than they are today, so there is a possibility that human burials may be present within the development area. In addition, churches were normally located within or adjacent to medieval or earlier settlements and manorial centres, the remains of which may lie within the development area. Likewise, common edges were popular settlement sites from the late Anglo-Saxon period onwards. Consequently there is potential that heritage assets with archaeological interest (buried archaeological remains) will be present at the site and that their significance will be adversely affected by the proposed development."
- Unacceptable impact of another road junction onto the B1113 near Catbridge Lane.
- Cumulative impact on medical and educational provision in Mulbarton.
- Added traffic to the already congested B1113 to access Norwich.
- Lack of access to local amenities.

**SN2039** Land north of Rectory Lane, Mulbarton

Agree with the reasons given for rejection, and:

- Outside the development area and settlement boundary for the parish
- Contrary to the Mulbarton Neighbourhood Plan
- Further impact on medical and educational provision in Mulbarton.
- Added traffic to the already congested B1113 to access Norwich.
- Limited access to area due to single track road, which has a width of 2.8 metres, has a weight limit of 7.5T and has dwellings either side.
- Access to either B1113 or A140 is poor and both roads running at capacity levels without taking into consideration extra housing at Long Stratton, Hempnall and Swainsthorpe.

**SN2087** South of Cuckoofield Lane, Bracon Ash

Agree with the reasons given for rejection, and:

- Cumulative impact on medical and educational provision in Mulbarton.
- Added traffic to the already congested B1113 to access Norwich.
- Lack of access to local amenities.



**SN4032** Land east of Norwich Road, Bracon Ash

- Cumulative impact on medical and educational provision in Mulbarton.
- Added traffic to the already congested B1113 to access Norwich.
- Lack of access to local amenities.

**SN4059** Corner of Brick Kiln Lane, Mulbarton

- Cumulative impact on medical and educational provision in Mulbarton.
- Added traffic to the already congested B1113 to access Norwich.
- Lack of access to local amenities.
- Conflicts with the proposed EDF solar farm development.