

South Norfolk District Council
South Norfolk House
Cygnet Court
Long Stratton
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21389/E1/JM
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Dear Mr Burrell

SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS PLAN: REGULATION 18 PUBLIC CONSULTATION
RESPONSE SUBMITTED ON BEHALF OF LANDSTOCK ESTATES LIMITED AND LANDOWNERS GROUP LIMITED

This response has been prepared on behalf of [REDACTED] (the 'Promoters') in response to South Norfolk's current Regulation 18 consultation in respect of the emerging South Norfolk Village Clusters Housing Allocations Plan (The 'Village Clusters Plan'). The Promoters have land interests in North East Wymondham, promoted as a sustainable, suitable and deliverable location for growth through the emerging Greater Norwich Local Plan. This response does not seek to review individual allocations or Clusters in detail, but instead seeks to respond to the principles underpinning the Village Clusters Plan.

As detailed in the introduction of the Village Clusters Plan consultation document, the plan aims to deliver sustainable growth within the villages of South Norfolk, developed alongside the GNL. With an aim to allocate a series of smaller sites, typically within the range of 12 to 50 homes, across 48 Village Clusters, to accommodate 'at least' 1,200 new homes in total, in addition to existing commitments identified (within the draft GNL) as being 1,392 homes.

The GNL as drafted sought to 'reserve' the future allocation of 1,200 homes to the South Norfolk Village Clusters. We submitted representations to the GNL objecting to this approach as it is unclear why the allocations cannot all be addressed in one document, and why they have been separated with different timetables, when both Plan-making processes are interlinked and dependent on each other. Firstly, we do not believe the most appropriate location for development of such a large portion of homes is within the small settlements or Village clusters, which are often the 'least sustainable location' from a perspective of accessibility by non-car nodes or to essential services (i.e., schools, convenience stores, health services, dentists etc). As such we consider the GNL to be unsound. Should the Inspector agree, and the GNL is found to be "unsound" the Village Clusters Plan, predicated on the GNL, would not be required. Further should the GNL be found 'unsound' for any other reason, the Villages Clusters Plan would also not be able to progress.



Furthermore, should the Village Clusters Plan be found “unsound”, a significant proportion of the housing delivery required by the GNLP cannot be relied upon. **As such it is clear that the approach to separating out these Plan-making processes, which are dependable on each other, is not effective or justified.** The preparation of the Village Clusters Plan should be completed alongside the GNLP and reviewed in unison through the Examination in Public process, ensuring a complete strategy for housing needs can be comprehensively considered.

The principle of requiring at least 1,200 homes within the Village Clusters, alongside existing commitments of circa. 1,400 homes, not been confirmed as justified, consistent with national policy, or effective in meeting housing needs through the GNLP. Objections have been raised to the soundness of this strategy by our client and multiple respondents at the Regulation 19 consultation stage, and it is unclear what the Joint Authorities response is to these objections. As no assessment had been undertaken as part of the GNLP of the capacity and suitability of Village Clusters to accommodate growth, the ‘reserve’ allocation of 1,200 homes appeared to be pre-judged. Even now, following publication of the Village Clusters Plan consultation document, it is unclear why the target for 1,200 homes remains. The allocations should be based on the principles of sustainable development, and a capacity/need assessment of each village cluster. The figure of 1,200 seems to be simply based on a pre-judged number from the untested GNLP in the absence of any clear rationale for this number of homes.

Whilst we endorse the principle of maintaining and improving the vitality of rural settlements, especially where existing services and facilities are supported, a maximum number of 50 homes per settlement is not considered to be anywhere near the number of additional homes required to truly underpin local services. A minimum of 500 homes is usually required to support a single form entry Primary School, and the expenditure available to local services from a maximum of 50 homes is likely to be de-minimus. Accordingly, **we do not believe the scale or approach being undertaken is justified and would be inconsistent with both national policy and the vision, aims and aspirations of the emerging GNLP, which seek to direct development to the most sustainable locations.** Draft Policy 7.5 of the emerging GNLP could instead provide a more effective tool for allowing appropriate growth of rural settlements to occur without the currently drafted limitations of 3 – 5 dwellings, alongside NPPF support for Entry level / First Homes exception sites.

As it is currently drafted the Village Clusters Plan allocates a significant element of growth to settlements which are at the lowest rung of the GNLP settlement hierarchy. The minimum of 1,200 homes proposed for the Clusters is greater than that proposed in the JCS as new allocations for the majority of other far larger settlements higher in the hierarchy, including all the Main Towns and Key Service Centres which benefit from local services and greater access by non-car modes. Indeed, the level of growth proposed in the Village Clusters Plan exceeds the scale of growth proposed in any of the Norwich Fringe Parishes, the exceptions being Taverham (Norwich Fringe Parish, at 1,417 new homes), The Growth Triangle (at 1,420 new homes) and the East Norwich Strategy Regeneration Area (at 3,230 new homes). As such **the approach strongly contradicts national policy as well as the overarching emphasis of the GNLP to direct sustainable development to the most sustainable locations, with development in the Cluster locations extremely dependent on private car usage and poorly related to Norwich.**

In some cases, the allocations (for 12 – 50 dwellings) would increase the population of villages by in excess of 10%. Villages of this size (100 to 500 dwellings) would have populations of between 200 and 1,200 people based on the average UK Household size. At that scale they are very unlikely to benefit from services and facility provision, by definition forcing people to travel for basic services contrary to the principles of sustainable development. Further such a scale of extension will clearly change the character of these villages. There is no assessment for how these allocations and / or cumulative allocations within Clusters or neighbouring villages / Clusters would interact with existing commitments, existing communities, and existing infrastructure.

No justification is provided as to why the dispersal of homes across numerous village clusters is needed, nor why it is preferred to allocating growth to more accessible locations higher up the settlement hierarchy which are consistent with the requirements of the GNLP, i.e. the larger settlements within the proposed Strategic Growth Area. As detailed in our client's response to the GNLP Regulation 19 consultation, there is no rationale presented as to why Wymondham, the largest settlement in South Norfolk is identified to support growth of only 150 homes, whilst villages without services/facilities/good accessibility received additional allocations up-to 50 dwellings.

The Sustainability Appraisal Report (SA) supporting this consultation is flawed on the basis that the 1,200 homes needs to be allocated to the Village Clusters. As noted previously, this is an option still to be Examined through the GNLP process and may not be formally endorsed. All options within the SA for distribution of 1,200 homes (i.e., Striking a balance, Accessibility led, and Dispersal led) would reasonably be expected to score lower against the criteria of the Sustainability Appraisal (SA) when compared to locations adjoining/within the largest settlements.

As an example, Table 9.1 of the SA identifies a significant constraint of a smaller settlement to be accessible to key services. It notes the average distance (noting some locations will be more distant than the average) between a 'preferred site' and GP, Primary School and Secondary School is 3.3km, 0.7km and 5km respectively. This would not be the case in a location such as Wymondham where these key services are readily accessible by walking, cycling or access to regular public transport.

In summary, **the Village Clusters are likely to be the least sustainable locations for growth across the Greater Norwich area**, yet they are proposed to accommodate a significant portion of the GNLP's housing growth. Allocating such a significant element of the GNLP's anticipated growth to these areas, where there are limited / no services and limited / no public transport, would be **contradictory to the principles of sustainable development and the overall vision of the GNLP**. We do not believe **the approach proposed by the Village Clusters Plan has been justified and it is clearly not consistent with national policy**. It does not respond to the principles of sustainable development, and it does not appear an effective assessment of the environmental impacts of this approach has been undertaken.

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Planning Associate