

02 August 2021

Local Planning Team
South Norfolk Council, South Norfolk House
Cygnet Court
Long Stratton
Norwich
NR15 2XE

SENT VIA EMAIL TO: lp@s-norfolk.gov.uk

Dear Sir or Madam

SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS PLAN: REGULATION 18 PUBLIC CONSULTATION

RESPONSE ON BEHALF OF PIGEON INVESTMENT MANAGEMENT LTD

Thank you for consulting Pigeon Investment Management Ltd ('Pigeon') on the South Norfolk Village Clusters Housing Allocations Regulation 18 Plan ('the Village Clusters Plan'). We very much welcome the opportunity to participate in the current Regulation 18 consultation.

Pigeon and their Landowners have previously made representations to the emerging Greater Norwich Local Plan urging the Councils to give further consideration to the allocation of the following sites within South Norfolk:

- Land at Hethersett (GNLP4052, GNLP1023A and GNLP1023BR, GNLP4054 and GNLP4053);
- Land at Rightup Lane, Wymondham (GNLP0355);
- Land at Walcot Green Lane, Diss (GNLP1044); and
- Land west of Neslon Road, Diss (GNLP1045).

The following representations are made on behalf of Pigeon and their Landowners and are intended to assist the Council in its ongoing preparation of the emerging Local Plan (including the Greater Norwich Local Plan and the Village Clusters Plan).

If it would be of assistance, we would be happy to meet with the Council to discuss our comments.

Emerging Greater Norwich Local Plan (GNLP)

South Norfolk Council is working with Broadland District Council, Norwich City Council and Norfolk County Council to prepare the Greater Norwich Local Plan (GNLP). The GNLP will build upon the joint working arrangements for Greater Norwich, set out within the current Joint Core Strategy (JCS), planning for the housing and jobs needs of the area to 2038.

The Regulation 19 Publication GNLP was published for consultation in February 2021. The Publication draft GNLP establishes the following settlement hierarchy:

1. Norwich urban area (Norwich and Norwich Fringe)
2. Main towns
3. Key service centres
4. Village clusters

The Publication draft GNLP provides for a “total minimum housing commitment” of 4,220 homes in Village Clusters, which are then split into ‘Existing deliverable commitment’ and ‘New allocations’ within Broadland and South Norfolk, as detailed in the table below.

Areas		Existing deliverable commitment	New allocations	Total minimum deliverable housing commitment
Village Clusters	Broadland	1,146	482	4,220
	South Norfolk	1,392	A minimum of 1,200	

Unlike the Broadland allocations, the new allocations for South Norfolk Village are not set out within the GNLP and it is of note that the Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Lepus Consulting, January 2021) states at paragraph 2.7.2 of the SA/SEA document that:

“It should be noted that the SA of the GNLP has not assessed smaller reasonable alternative sites located in South Norfolk because the ‘South Norfolk Village Clusters’ will be considered as part of the South Norfolk Village Clusters Housing Allocations Plan”.

It is evident from the above that the strategy to direct at least 1,200 homes to South Norfolk Village Clusters has been carried out in advance of assessing the suitability of potential allocation sites within South Norfolk. As such, the decision to effectively ‘ring fence’ this element of the GNLP housing requirement has been taken without having first assessed whether there are suitable sites to deliver this strategy. It is therefore difficult to see how this strategy can be considered to be an ‘appropriate strategy’, as required by paragraph 35 of the National Planning Policy Framework (NPPF), which states that Plans are sound if they are justified – i.e. ***“an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”.***

In order to remedy this situation, we consider that it is not only necessary to assess the potential Village Cluster sites in isolation (as per the current Regulation 18 consultation), but to assess them alongside other potential allocation sites within the Main towns and Key Service Centres.

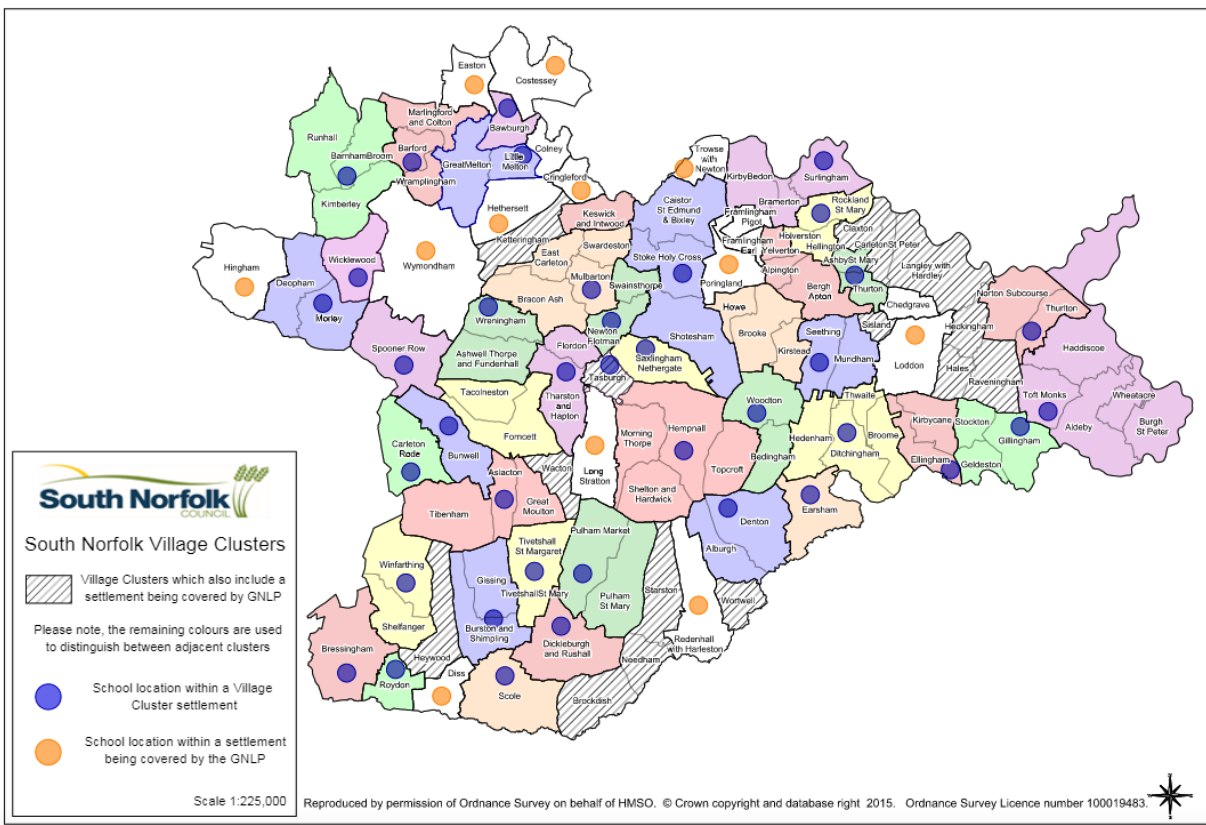
Furthermore, the Publication draft GNLP is yet to be the subject of Examination and there are outstanding objections to the GNLP that have not yet been resolved. As such, it would appear to be premature to progress the Village Clusters Plan, which is predicated on the draft strategy set out

within the Publication draft GNLP, until such time as it has been the subject of examination to assess whether it has been prepared in accordance with the relevant legal and procedural requirements, and whether it is sound.

The Settlement Hierarchy and Village Clusters

The overarching strategy for growth across Broadland, Norwich and South Norfolk, as set out in the emerging GNLP, seeks to determine how the overall housing requirement of 40,541 homes between 2018 and 2038 should be distributed across the City and urban fringe, the Main Towns, Key Service Centres, and Village Clusters. As detailed above the Publication Draft GNLP does this by setting out a proposed settlement hierarchy.

The Village Clusters are defined in the GNLP as a group of villages which share services and facilities and the Village Clusters consultation document identifies that the extent of the individual Village Clusters in South Norfolk is based upon primary school catchment areas, as detailed in the extract below.



Extract from South Norfolk Council Village Clusters Virtual Exhibition (www.southnorfolkandbroadland.gov.uk)

The site assessments for the potential Village Cluster sites have therefore been undertaken without regard to the availability of alternative sites within Key Service Centres and Main Towns (as identified in map the extract above). Whilst Pigeon support the principle of enhancing and maintaining the vitality of rural communities, this needs to be balanced with other sustainable development objectives, such as actively managing patterns of growth so that walking, cycling and public transport use are promoted.

The settlement hierarchy has been developed with regard to the size, range of services and facilities and access to jobs within the existing settlements. As such, there are increased opportunities to deliver sustainable development within the settlements that form the upper tiers of the settlement hierarchy. In this regard, we suggest that the proposed Village Cluster sites should be assessed alongside alternative sites in Key Service Centres and Main Towns, where there are opportunities to deliver growth that will have greater access to services, facilities and jobs. Artificially ring-fencing the Village Clusters and the failure to undertake a comparative assessment of the Village Cluster sites alongside alternative sites within Main Towns and Key Service Centres, gives rise to the potential for sites that are unsuitable or will give rise to less sustainable patterns of development being allocated.

Settlement Limits

On the whole settlement limits are identified within the Village Clusters Plan to include the main built form of the particular settlement and sites that are allocated. The consultation on the Village Clusters Plan invites respondents to comment on the extent of the settlement limits and any proposed changes.

We note that there appears to be no such provision to review settlement limits within the Main Towns and Key Service Centres. This means that potential opportunities for infill development within more sustainable locations may be overlooked in favour of development within Village Clusters. As such, we would urge the Council to undertake a review of settlement limits within all settlements within South Norfolk by way of a focussed review of the Site Specific Allocations and Policies Document and Area Actions Plans.

Closure

We look forward to participating in subsequent rounds of consultation on the emerging Local Plan and request that we are notified of any subsequent consultation stages. In the meantime, we would be happy to meet with officers to discuss the content of our representations if this would be of assistance.

Yours faithfully

Rob Snowling BSC (Hons) MA MRTPI
Associate Director